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DISTRICT OF NEVADA

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12 UNITED STATES DISTRICT COURT

13 DISTRICT

14 CV-S-03-1230-KJD-RJJ

15 EQUAL EMPLOYMENT  
16 OPPORTUNITY COMMISSION,

17 Plaintiff,

18 vs.

19 SUN CAB COMPANY, INC., d/b/a  
20 NELLIS CAB COMPANY

21 Defendant.

22 COMPLAINT

- CIVIL RIGHTS
- EMPLOYMENT DISCRIMINATION

(42 U.S.C. §§ 2000e, et seq.)

23 JURY TRIAL DEMAND

24 NATURE OF THE ACTION

25 This is an action under Title VII of the Civil Rights Act of 1964, and Title I  
26 of the Civil Rights Act of 1991 to correct unlawful employment practices on the  
27 basis of National Origin and to provide appropriate relief to Hassan Bashir ("Mr.  
28 Bashir") and a class of similarly situated persons. Jurisdiction of this Court is  
invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343 and 1345. Plaintiff  
Equal Employment Opportunity Commission (the "Commission") alleges that  
Mr. Hassan Bashir and a class of similarly situated persons applied for and were  
qualified for the position (taxi driver) with Defendant, Sun Cab Company,  
Incorporated, d/b/a Nellis Cab Company ("Defendant Employer"), yet were  
repeatedly denied and refused employment by Defendant Employer because of  
their national origin (Ethiopian).



1 in violation of Title VII. All conditions precedent to the institution of this lawsuit  
2 have been fulfilled.

3 8. The Commission alleges that, since at least on or about 2002,  
4 Defendant Employer has engaged in unlawful employment practices at its Las  
5 Vegas, Nevada locations in violation of Section 703(a) of Title VII, 42 U.S.C. §  
6 2000e-2(a) by subjecting Mr. Bashir and a class of similarly situated persons to  
7 employment discrimination based upon their national origin (Ethiopian).  
8 Specifically, Defendant Employer repeatedly failed and refused to hire Mr. Bashir  
9 and a class of similarly situated and qualified individuals as taxi drivers, because  
10 of their national origin.

11 9. The effect of the practices complained of above has been to deprive  
12 Mr. Bashir and a class of similarly situated persons of equal employment  
13 opportunities and otherwise adversely affect their status as applicants for  
14 employment, because of their national origin (Ethiopian) under Section 703(a) of  
15 Title VII, 42 U.S.C. § 2000e-2(a).

16 10. As a direct and proximate result of the aforesaid acts of Defendant,  
17 Mr. Bashir and a class of similarly situated persons suffered a loss of earnings  
18 and other pecuniary losses in an amount according to proof.

19 11. The unlawful employment practices complained of above were  
20 intentional.

21 12. The unlawful employment practices complained of above were done  
22 with malice or with reckless indifference to the federally protected rights of Mr.  
23 Bashir and a class of similarly situated persons.

24 13. As a direct and proximate result of the aforesaid acts of Defendant  
25 Employer, Mr. Bashir and a class of similarly situated persons have suffered  
26 emotional pain, suffering, inconvenience, loss of enjoyment of life, humiliation  
27 and damages, according to proof.

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1 pecuniary losses resulting from the unlawful employment practices described  
2 above, in amounts to be determined at trial.

3 F. Order Defendant Employer to make whole Mr. Bashir and a class of  
4 similarly situated persons by providing compensation for past and future non-  
5 pecuniary losses resulting from the unlawful practices complained of above,  
6 including, but not limited to emotional pain, suffering, inconvenience, loss of  
7 enjoyment of life, and humiliation, in amounts to be determined at trial.

8 G. Order Defendant Employer to pay Mr. Bashir and a class of similarly  
9 situated persons punitive damages for its malicious and reckless conduct based  
10 upon the facts above, in amounts to be determined at trial.

11 H. Order Defendant to make and preserve all records, in accordance  
12 with the provisions of Section 709(c) of Title VII of the Civil Rights Act of 1964,  
13 42 U.S.C. §2000e-8(c), relevant to the determination of whether unlawful  
14 employment practices have been or are being committed.

15 I. Grant such further relief as the Court deems necessary and proper in  
16 the public interest.

17 J. Award the Commission its costs of this action.

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JURY TRIAL DEMAND

The Commission requests a jury trial on all questions of fact raised by its complaint.

Respectfully submitted,

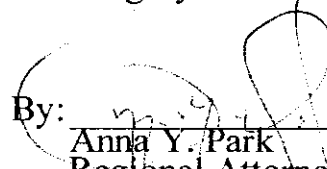
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EQUAL EMPLOYMENT  
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Date: September 29, 2003

By:   
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