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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF ARIZONA

11 Equal Employment Opportunity ) **CIV 06-2331 PHX FJM**  
12 Commission, )  
13 Plaintiff, ) **FIRST AMENDED**  
14 vs. ) **COMPLAINT**  
15 Target Stores, Inc. d/b/a Target Financial )  
16 Services, ) **JURY TRIAL DEMANDED**  
17 Defendant. )

18 **NATURE OF THE ACTION**

19 This is an action under Title VII of the Civil Rights Act of 1964 to correct  
20 unlawful employment practices on the basis of race and to make whole Bridget Shores.  
21 Plaintiff Equal Employment Opportunity Commission ("EEOC" or the "Commission")  
22 alleges that Defendant, Target Stores, Inc., d/b/a Target Financial Services ("Target  
23 Financial"), failed and refused to promote Bridget Shores because of her race, African-  
24 American. In addition, Defendant failed to retain materials relevant to the employment  
25 actions at issue in this case, as required by federal law.

26 **JURISDICTION AND VENUE**

27 1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§451, 1331,  
28 1337, 1343 and 1345. This action is authorized and instituted pursuant to Sections  
706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C.  
§2000e, *et seq.* ("Title VII").





1 interest, in amounts to be determined at trial;

2 E. Order defendant Target Financial to make whole all individuals adversely  
3 affected by the unlawful practices described above, by providing the affirmative relief  
4 necessary to eradicate the effects of its unlawful employment practices, including but not  
5 limited to, rightful place promotion and reinstatement of Bridget Shores;

6 F. Order defendant Target Financial to make whole Bridget Shores by  
7 providing compensation for past and future pecuniary losses resulting from the unlawful  
8 employment practices described above, in amounts to be determined at trial;

9 G. Order defendant Target Financial to make whole Bridget Shores by  
10 providing compensation for past and future non-pecuniary losses resulting from the  
11 unlawful practices complained of above, including emotional pain, suffering,  
12 inconvenience, loss of enjoyment of life and humiliation;

13 H. Order defendant Target Financial to pay Bridget Shores punitive damages  
14 for its malicious and reckless conduct described above, in amounts to be determined at  
15 trial;

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

18 J. Award the Commission its costs in this action.

19 **JURY TRIAL DEMAND**

20 The Commission requests a jury trial on all questions of fact raised by its  
21 Complaint.

22 DATED this 4<sup>th</sup> day of October, 2006.

23 Respectfully submitted,

24 RONALD S. COOPER  
25 General Counsel

26 GWENDOLYN YOUNG REAMS  
27 Associate General Counsel

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s/ Mary Jo O'Neill  
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Regional Attorney

s/ Sally C. Shanley  
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