

(Handwritten signatures and initials)

FILED

SEP 29 2006

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

PVT

**EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

CIVIL ACTION NO.

Plaintiff,

C-06-6141

v.

**TRIMBCO, INC. d/b/a Sharp Precision
Manufacturing,**

**COMPLAINT
Civil Rights
- Employment Discrimination**

Defendant.

JURY TRIAL DEMAND

NATURE OF THE ACTION

This is an action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of sex and to provide appropriate relief to Charging Party, Anna Valdez McAllister, and other similarly situated individuals who were adversely affected by such practices. As alleged below, defendant TrimbcO, Inc. d/b/a Sharp Precision Manufacturing subjected the claimants to a hostile work environment based on sex, female, and national origin, Hispanic.

JURISDICTION AND VENUE

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§451, 1331, 1337, 1343, and 1345. This action is authorized and instituted pursuant to §706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended (Title VII), 42 U.S.C. §2000e-5(f)(1) and (3), and §102 of the Civil Rights Act of 1991, 42 U.S.C. §1981a.

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant, its officers, successors, assigns, and all persons in active concert or participation with them, from engaging in harassment based on sex and/or national origin and any other employment practice which discriminates on the basis of sex and/or national origin.

B. Order Defendant to institute and carry out policies, practices, and programs which provide equal employment opportunities for its employees and which eradicate the effects of its past and present unlawful employment practices.

C. Order Defendant to make whole the employees by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described above, with interest, in amounts to be determined at trial.

D. Order Defendant to make whole the employees by providing compensation for past and future non-pecuniary losses caused by the above unlawful conduct, including pain and suffering, emotional distress, indignity, loss of enjoyment of life, loss of self-esteem, and humiliation, in amounts to be determined at trial.

E. Order Defendant to pay the employees punitive damages for its malicious and reckless conduct described above, in amounts to be determined at trial.

F. Grant such further relief as the Court deems proper.

G. Award the Commission its costs in this action.

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JURY TRIAL DEMAND

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

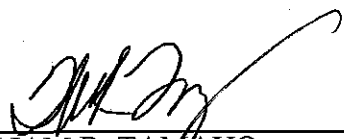
Ronald S. Cooper
General Counsel

James L. Lee
Deputy General Counsel

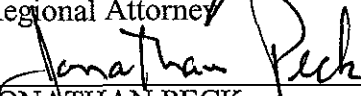
Gwendolyn Young Reams
Associate General Counsel

**Equal Employment Opportunity
Commission**
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Washington, DC 20507

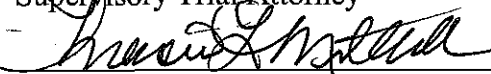
Date: September 27, 2006



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