

May 6, 2009 2:06 PM

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U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

LAURA STEIGER,

Plaintiff,

v.

LITTLE RIVER CASINO RESORT,
DONALD HEWITT,

Defendants.

Case No. **1:09-cv-410**

Hon. **Robert J. Jonker**
U.S. District Judge

Christopher D. Morris (P36292)
Nicholas J. Daly (P72101)
Ryan, Jamieson, Morris, Ryan & Smith
Attorneys for Plaintiff
121 W. Cedar Street
Kalamazoo, Michigan 49007
(269) 382-5143

COMPLAINT AND DEMAND FOR JURY TRIAL

NOW COMES Plaintiff, Ms. Laura Steiger, by and through her attorneys Ryan, Jamieson, Morris, Ryan & Smith, and for her Complaint and Demand for Jury Trial states as follows:

Jurisdiction and Venue

1. Plaintiff, Laura Steiger, is a resident of the County of Mason, in the State of Michigan, and is subject to the jurisdiction of this Court.
2. Defendant, Little River Casino Resort, is located in Manistee County, in the State of Michigan and regularly conducts business within the Western District of Michigan.

3. Defendant, Donald Hewitt, is a resident of the United States of America, was Plaintiff's supervisor while employed by Defendant Little River, and is subject to the jurisdiction of this Court.
4. All conduct relevant to this action occurred within the Western District of Michigan.
5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 as this case arises under the Civil Rights Act of 1964.

Factual Allegations

6. Plaintiff realleges and incorporates by reference paragraphs 1 through 5 as though fully set forth herein.
7. Plaintiff was employed by Defendant Little River from May 2004 until approximately August 17, 2006.
8. As an employee of Defendant Little River, Defendant Hewitt supervised Plaintiff in the performance of her duties.
9. Defendant Hewitt, while supervising Plaintiff in the performance of her duties and while Defendant Hewitt acted as agent for Defendant Little River, made sexually explicit remarks to and regarding the Plaintiff.
10. Defendant Hewitt, while supervising Plaintiff in the performance of her duties and while acting as agent for Defendant Little River, sexually assaulted Plaintiff.
11. Plaintiff did not welcome the sexually explicit remarks and assaults of Defendant Hewitt.
12. The sexually harassing behavior of Defendant Hewitt was severe and pervasive, affecting the terms, conditions, or privileges of Plaintiff's employment with

Defendant Little River, or any matter directly or indirectly related to Plaintiff's employment with Defendant Little River.

13. Defendant Little River knew or should have known of the sexually harassing conduct of their agent, Defendant Hewitt.
14. Defendant Little River failed to take immediate and appropriate action with regard to the sexually harassing conduct of their agent, Defendant Hewitt.
15. After making reports to Defendant Little River and the Michigan State Police, Plaintiff experienced retaliatory measures taken by Defendant Little River and other supervisors employed by Defendant Little River.
16. Plaintiff's last day of work for Defendant Little River was on or approximately August 17, 2006.
17. The sexual harassment Plaintiff experienced while employed by Defendant Little River actually or proximately caused the Plaintiff to experience Post-Traumatic Stress Disorder.
18. Plaintiff continues to suffer from, and will continue to experience, Post-Traumatic Stress Disorder for the foreseeable future.
19. As a direct and proximate result of the Defendants' actions, Plaintiff has suffered emotional and psychological damages.

WHEREFORE, Plaintiff respectfully requests this Honorable Court award damages in her favor and against each Defendant for the emotional and psychological distressed caused the Defendants' actions or inaction, along with all other appropriate relief this Court deems proper.

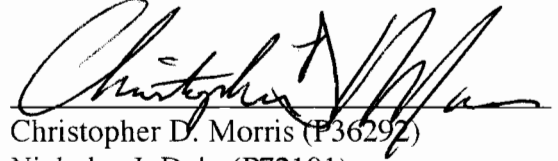
Jury Demand

The Plaintiff, Ms. Laura Steiger, respectfully requests a Jury in this matter.

Dated: May 5, 2009

RYAN, JAMIESON, MORRIS, RYAN & SMITH

By:



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