

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

SHONNISE WOODS	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
INTEGRITY TRADE SERVICES, LLC,	)	Cause No:
	)	
Serve:	)	
Burkelaw Agents, Inc.	)	
330 N. Wabash Ave., 21 <sup>st</sup> Fl.	)	
Chicago, IL 60611	)	
	)	
and	)	
	)	
ILLINOIS TOOL WORKS, INC.,	)	
	)	
Serve:	)	
CT Corporation System	)	
208 So. LaSalle St., Suite 814	)	
Chicago, IL 60604-1101	)	
	)	
and	)	
	)	
ITW SEATS & MOTION	)	
	)	
Serve at:	)	
21601 South Harlem Ave.	)	
Frankfort, Illinois 60423	)	
	)	
Defendants.	)	JURY TRIAL DEMANDED

**COMPLAINT**

COMES NOW Plaintiff Shonnise Woods, by her attorneys, and for her complaint against Integrity Trade Services, LLC, Illinois Tool Works, Inc., and ITW Seats & Motion states as follows:

**INTRODUCTION**

1. This is an action under the Illinois Human Rights Act, 775 Ill. Comp. Stat. Ann. 5/1-101 *et. seq.* (IHRA) and Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000 (e) *et. seq.* (Title VII) to correct unlawful employment practices on the basis of sex and retaliation and to provide appropriate relief to Plaintiff Shonnise Woods.

#### **JURISDICTION AND VENUE**

2. This Court has jurisdiction under 28 U.S.C. §1331 to hear and decide claims under federal law. This Court has supplemental jurisdiction under 28 U.S.C. §1367(a) to hear and decide Plaintiff's claims under Illinois state law.

3. Venue is proper in this Court pursuant to 28 U.S.C §1391(b)(1) because Defendants are residents of this District, and all events giving rise to this action occurred within the Northern District of Illinois.

4. On April 4, 2023, Plaintiff cross-filed a charge against Defendants with the Equal Employment Opportunity Commission (EEOC) and the Illinois Department of Human Rights (IDHR) alleging sexual discrimination and retaliation against Defendants.

5. On October 19, 2024, the EEOC issued Rights to Sue on the charges.

6. Plaintiff filed this action within 90 days of receipt of the foregoing notices. Plaintiff complied fully with the administrative exhaustion requirements of Title VII. When Plaintiff receives the letters constituting a right to sue from the IDHR, she will provide those.

#### **PARTIES**

7. Plaintiff is a female citizen currently residing in Cook County, IL.

8. Defendant Integrity Trade Services, LLC is an Illinois business located at 9680 Lincoln Way Lane, Frankfort, IL 60423. Defendant Integrity Trade Services, LLC is an employment staffing agency.

9. Defendant Illinois Tool Works, Inc. is a Delaware corporation located at 155 Harlem Avenue, Glenview, IL 60025. Defendant Illinois Tool Works, Inc. manufactures products for motor vehicles.

10. Defendant ITW Seats & Motion is an Illinois Tool Works, Inc. corporation located at 21601 South Harlem Ave., Frankfort, Illinois 60423.

11. At all times relevant herein, Defendants employed at least fifteen employees.

12. At all times relevant herein, Defendants acted through their servants and agents.

**STATEMENT OF FACTS  
COMMON TO ALL COUNTS**

13. Plaintiff is a female citizen.

14. From approximately November 14, 2022 to February 6, 2023, Plaintiff worked for Defendant Integrity Trade Services (ITS).

15. Defendant ITS is an employment staffing agency.

16. During her employment, Defendant ITS placed Plaintiff at several temporary jobs.

17. On or about January 9, 2023, Defendant ITS placed Plaintiff as a Quality Control Technician for Defendant ITW Seats & Motion (ITW).

18. During Plaintiff's employment with both Defendants, she performed her job responsibilities in a satisfactory manner.

19. During Plaintiff's employment, both Defendants ITS and ITW exercised power and control over Plaintiff's employment.

20. During Plaintiff's employment, Defendants ITS and ITW were joint employers of Plaintiff.

21. Defendant ITW is not registered with the Illinois Secretary of State but is a division of Illinois Tool Works, Inc., which is registered with the Illinois Secretary of State.

22. All actions by Defendant ITW in this Complaint are therefore legally attributed to Illinois Tool Works, Inc.

23. In or about January 2023, Defendant ITW assigned Plaintiff to the night or “third” shift.

24. On the third shift, one of Plaintiff’s co-workers, Tim Vaughn, was a full-time employee with Defendant ITW.

25. In Plaintiff’s first week of work at Defendant ITW, Vaughn asked Plaintiff how old she was. Plaintiff responded that her age was not relevant to her work.

26. The next week, Plaintiff received training from her shift lead Marquita (last name unknown). Marquita told Plaintiff that after lunch that day she would show Plaintiff the notepad where she could check for daily updates.

27. During Marquita’s lunch break, Vaughn approached Plaintiff and asked if he could show Plaintiff where the notepad was. Plaintiff stated Marquita would show it to her. Vaughn insisted on showing Plaintiff where the notepad was.

28. Vaughn escorted Plaintiff to the main office, which was dark and empty. Plaintiff felt uncomfortable and quickly retrieved the notebook.

29. On the walk back, Vaughn stated he “would like to get to know you outside work.” Plaintiff told him she was there only to work and did not date co-workers.

30. Later that week, Vaughn came into Plaintiff’s workspace and asked if she would like to have lunch with him. Plaintiff declined.

31. Vaughn frequently entered Plaintiff’s workspace to provide parts she had already inspected or to ask unnecessary questions.

32. On or about January 28, 2023, Vaughn asked Plaintiff where she went to lunch every day. Plaintiff declined to respond.

33. Vaughn's continued harassment made Plaintiff very uncomfortable and impeded her ability to perform her job responsibilities.

34. On or about January 30, 2023, Plaintiff reported Vaughn's sexual harassment to her supervisor Jasmin (last name unknown) and Human Resources Manager Kelly (last name unknown) at Defendant ITW. Plaintiff told them she was not comfortable working with Vaughn. Kelly and Jasmin told Plaintiff they would talk to Vaughn about her complaint.

35. On or about February 2, 2023, Kelly informed Plaintiff that she had not made any finding of sexual harassment because it was "your word against his."

36. Kelly stated Plaintiff would be required to continue working with Vaughn and stated that the door to Plaintiff's workspace was going to be removed.

37. On or about February 3, 2023, HR Manager for Defendant ITS Carolyn Roberson informed Plaintiff that she had received an e-mail from Kelly at ITW stating Plaintiff was no longer a good fit for her job at ITW.

38. Plaintiff informed Roberson about Vaughn's ongoing sexual harassment, which Plaintiff had reported to her supervisors and Human Resources at ITW. Plaintiff told Roberson that she felt that she was being discriminated and retaliated against because of her complaint.

39. Roberson said she could not assist Plaintiff with her complaints of sexual harassment, discrimination, and retaliation. Plaintiff asked to speak to someone higher up the chain of command at Defendant ITS about the complaint.

40. Roberson then told Plaintiff not to report to work for ITW until Roberson called Plaintiff back on February 6, 2023.

41. On or about February 6, 2023, Roberson informed Plaintiff that Defendant ITS was also terminating Plaintiff's employment and would not be able to assist her with another job placement because Plaintiff had asked Roberson to escalate Plaintiff's complaints.

**VIOLATIONS OF LAW**

**COUNT I**

**TITLE VII VIOLATION FOR GENDER DISCRIMINATION  
Against Defendants Illinois Tool Works, Inc. and ITW Seats & Motion**

42. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

43. At all material times, Defendants were Plaintiff's employers within the meaning of 42 U.S.C. § 2000(e)(b) and 42 U.S.C. § 2000(e)(c).

44. At all material times, Plaintiff was an employee as defined by 42 U.S.C. § 2000(f).

45. Plaintiff is a protected person (woman) within the meaning of Title VII.

46. Defendant ITW subjected Plaintiff to harassment based on her sex.

47. The harassment was so severe or pervasive as to alter the terms and conditions of Plaintiff's work for Defendant ITW.

48. Defendant ITW terminated Plaintiff's employment because of her sex.

49. Defendant ITW is not registered with the Illinois Secretary of State but is a division of Illinois Tool Works, Inc., which is registered with the Illinois Secretary of State.

50. All actions by Defendant ITW in this Complaint are therefore legally attributed to Illinois Tool Works, Inc.

51. As a result of Defendants' actions, Plaintiff has suffered lost wages and benefits of employment.

52. As a result of Defendants' actions, Plaintiff has suffered emotional distress and mental anguish.

53. The foregoing conduct, as alleged, was committed knowingly, willfully, and maliciously by Defendants in violation of the law, as Defendants knew or showed reckless disregard for Plaintiff's rights.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendants Illinois Tool Works, Inc. and ITW Seats & Motion on Count I for sex discrimination in violation of Title VII, awarding lost wages and benefits, reinstatement, front wages, emotional distress damages, compensatory damages, punitive damages, pre- and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT II**  
**TITLE VII VIOLATION FOR RETALIATION**  
**Against All Defendants**

54. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

55. At all material times, Defendants were Plaintiff's employers within the meaning of 42 U.S.C. § 2000(e)(b) and 42 U.S.C. § 2000(e)(c).

56. At all material times, Plaintiff was an employee as defined by 42 U.S.C. § 2000(f).

57. During her employment, Plaintiff reported unwelcomed sexual harassment to Defendant ITS.

58. During her employment, Plaintiff reported unwelcomed sexual harassment to Defendant ITW.

59. Plaintiff's report(s) of sexual harassment constituted protected activity.

60. Defendant ITS terminated Plaintiff's employment because of her protected activity.

61. Defendant ITW terminated Plaintiff's employment because of her protected activity.

62. Defendant ITW is not registered with the Illinois Secretary of State but is a division of Illinois Tool Works, Inc., which is registered with the Illinois Secretary of State.

63. All actions by Defendant ITW in this Complaint are therefore legally attributed to Illinois Tool Works, Inc.

64. As a result of Defendants' actions, Plaintiff has suffered lost wages and benefits of employment.

65. As a result of Defendants' actions, Plaintiff has suffered emotional distress and mental anguish.

66. The foregoing conduct, as alleged, was committed knowingly, willfully, and maliciously by Defendants in violation of the law, as Defendants knew or showed reckless disregard for Plaintiff's rights.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendants Integrity Trade Services, LLC, Illinois Tool Works, Inc., and ITW Seats & Motion on Count II for retaliation in violation of Title VII, awarding lost wages and benefits, reinstatement, front wages, emotional distress damages, compensatory damages, punitive damages, pre- and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT III**  
**ILLINOIS HUMAN RIGHTS ACT: GENDER DISCRIMINATION**  
**Against Defendants Illinois Tool Works, Inc. and ITW Seats & Motion**



67. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

68. At all material times, Defendants Illinois Tool Works, Inc. and ITW Seats & Motion were Plaintiff's employers within the meaning of 775 ILCS 5/2-101(B).

69. At all material times, Plaintiff was an employee as defined by 775 ILCS 5/2-101(A)

70. Plaintiff is a protected person (woman) within the meaning of the IHRA.

71. Defendant ITW subjected Plaintiff to harassment based on her sex.

72. The harassment was so severe or pervasive as to alter the terms and conditions of Plaintiff's work for Defendant ITW.

73. Defendant ITW terminated Plaintiff's employment because of her sex.

74. Defendant ITW is not registered with the Illinois Secretary of State but is a division of Illinois Tool Works, Inc., which is registered with the Illinois Secretary of State.

75. All actions by Defendant ITW in this Complaint are therefore legally attributed to Illinois Tool Works, Inc.

76. As a result of Defendants' actions, Plaintiff has suffered lost wages and benefits of employment.

77. As a result of Defendants' actions, Plaintiff has suffered emotional distress and mental anguish.

78. The foregoing conduct, as alleged, was committed knowingly, willfully, and maliciously by Defendants in violation of the law, as Defendants knew or showed reckless disregard for Plaintiff's rights.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendants Illinois Tool Works, Inc. and ITW Seats & Motion on Count III for sex

discrimination in violation of the IHRA, awarding lost wages and benefits, reinstatement, front wages, emotional distress damages, compensatory damages, punitive damages, pre- and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

**COUNT IV**  
**ILLINOIS HUMAN RIGHTS ACT: RETALIATION**  
**Against All Defendants**

79. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

80. At all material times, Defendants were Plaintiff's employers within the meaning of 42 U.S.C. § 2000(e)(b) and 42 U.S.C. § 2000(e)(c).

81. At all material times, Plaintiff was an employee as defined by 42 U.S.C. § 2000(f).

82. During her employment, Plaintiff reported unwelcomed sexual harassment to Defendant ITS.

83. During her employment, Plaintiff reported unwelcomed sexual harassment to Defendant ITW.

84. Plaintiff's report(s) of sexual harassment constituted protected activity.

85. Defendant ITS terminated Plaintiff's employment because of her protected activity.

86. Defendant ITW terminated Plaintiff's employment because of her protected activity.

87. Defendant ITW is not registered with the Illinois Secretary of State but is a division of Illinois Tool Works, Inc., which is registered with the Illinois Secretary of State.

88. All actions by Defendant ITW in this Complaint are therefore legally attributed to Illinois Tool Works, Inc.

89. As a result of Defendants' actions, Plaintiff has suffered lost wages and benefits of employment.

90. As a result of Defendants' actions, Plaintiff has suffered emotional distress and mental anguish.

91. The foregoing conduct, as alleged, was committed knowingly, willfully, and maliciously by Defendants in violation of the law, as Defendants knew or showed reckless disregard for Plaintiff's rights.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendants Integrity Trade Services, LLC, Illinois Tool Works, Inc., and ITW Seats & Motion on Count IV for retaliation in violation of the IHRA, awarding lost wages and benefits, reinstatement, front wages, emotional distress damages, compensatory damages, punitive damages, pre- and post-judgment interest, and attorney's fees and costs, as well as any other relief this Court deems may be just and proper.

#### **DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully demands a trial by jury on all issues triable by a jury.

Respectfully submitted, by:

**KENNEDY HUNT, P.C.**

By: /s/ Sarah Jane Hunt

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