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Geraty v. Village of Antioch

United States District Court, N.D. Illinois, Eastern Division - January 8, 2015 - Not Reported in F.Supp.3d - 2015 WL 127917

A jury found that the Village of Antioch discriminated against Geraty, a police officer in the Village, on the basis of her gender by failing to promote her to the position of sergeant and by failing to transfer her to the position of detective. The jury awarded Geraty \$250,000 in compensatory damages.

At issue here was which Title VII damages cap was applicable. If the Village had 200 or fewer employees during the relevant time period, Geraty's compensatory damages are capped at \$100,000, but if the Village had 201 or more employees, a \$200,000 cap applies.

After an exhaustive analysis of the definition of "employee" and the arguments of the parties regarding the applicable criteria for designating an individual as an "employee," the court ruled that the \$200k cap applied.