

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. _____

KATHLEEN AUTUMN JONES,

Plaintiff,

v.

ADAMS COUNTY SCHOOL DISTRICT 14,

Defendant.

COMPLAINT AND JURY DEMAND

Plaintiff Kathleen Autumn Jones, through undersigned counsel, Temitayo (“Tayo”) O. Okunade of MOUNTAIN WEST LAW GROUP, PC, submits this Complaint and Jury Demand, and alleges as follows:

I. INTRODUCTION

1. This action involves Defendant Adams County School District 14’s (“Adams 14”) unwillingness to correct long-standing pattern and practice of discrimination based upon race, as well as blatant gender discrimination against white females within Adams 14, in violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et seq.* (“Title VII”), and 42 U.S.C. § 1981.

2. As alleged with particularity below, Defendant terminated Plaintiff’s employment due to her race and gender. Prior to her termination on May 6, 2015, Plaintiff was unlawfully stripped of her official duties as the Communications Specialist for Adams City High School

(“ACHS”) and was placed on an unjustified suspension by Defendant, only to have her duties assumed by a Hispanic male.

II. JURISDICTION AND VENUE

3. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1343. This action is authorized and instituted pursuant to 29 U.S.C. § 626(c), Section 706 of Title VII of the Civil Rights Act of Title VII, as amended, and 42 U.S.C. § 1981.

4. The unlawful employment practices alleged herein were committed within the jurisdictional boundaries of the United States District Court for the District of Colorado and venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(f)(3).

III. ADMINISTRATIVE PREREQUISITIES

5. Prior to filing this Complaint, Plaintiff complied with all procedural prerequisites for bringing this lawsuit. On or about August 18, 2015, Plaintiff timely filed a charge of employment discrimination with the United States Equal Employment Opportunity Commission (“EEOC”).

6. In a letter dated August 24, 2016, Plaintiff was issued a Notice of Right to Sue (“Notice”) notifying Plaintiff that she had ninety days from the receipt of the Notice to file this Complaint. This Complaint has been filed within the ninety days. Therefore, under 42 U.S.C. § 2000e-5(f)(1), Plaintiff has satisfied all procedural prerequisites for suing Defendant in federal court.

IV. PARTIES

7. Plaintiff Kathleen Autumn Jones is a Caucasian female and was at all times relevant hereto a resident of the State of Colorado.

8. Defendant Adams County School District 14 is a public school district organized pursuant to Colorado law consisting of thirteen schools, including ACHS, and employs more than 500 employees.

V. FACTUAL ALLEGATIONS

9. Adams 14 hired Plaintiff, a Caucasian female, as the Communications Specialist for ACHS on August 5, 2014. The Communications Specialist position was an integral part of ACHS' and Adams 14's priority improvement and turnaround process ("Turnaround Plan"), which Adams 14 was accredited in 2011.

10. In accordance with the Colorado Education Accountability Act of 2009, Districts that are accredited as either "turnaround" or "priority improvement" have five (5) years to adopt and implement a plan to improve certain key performance indicators, including student academic growth, or face the loss of accreditation from the state.

11. As ACHS' Communications Specialist, Plaintiff was hired to highlight, as well as to help raise awareness within the community of, ACHS' achievements and successes during this Turnaround Plan. She directly reported to, and her work was supervised by, the ACHS principal and his administrative team.

12. Prior to Adams 14, Plaintiff worked for the University of Colorado ("CU-Boulder") in the Office of Strategic Relations as a Social Media Strategist. In addition, while Plaintiff was pursuing her full-time graduate studies in journalism at CU-Boulder, she worked in the CU-Boulder Athletic Department and was a contributing writer for the American Cowboy magazine.

13. Pursuant to Plaintiff's formal notification of employment letter from Defendant, dated August 12, 2014, which Plaintiff signed, Plaintiff's position was slated for 228 days per

year (prorated to 216 days based on Plaintiff's start date) with Adams 14, which provided for Plaintiff's first year employment end date with Adams 14 on or around June 27, 2015.

14. In addition, given that Plaintiff's position was created as part of the Turnaround Plan at ACHS, she received assurances from Mr. Anthony Smith (ACHS' principal prior to Mr. Gionni Thompson), among others, that her position would remain at least through the end of the Turnaround Plan, i.e. through 2016.

15. As part of her professional development and duties at ACHS, Plaintiff actively engaged with the ACHS administrative team and the community to develop and implement internal and external communication strategies, including but not limited to, branding, social media, website content, newsletters, and other community relations.

16. Plaintiff excelled in her position where she enjoyed working with ACHS students, parents, faculty, staff, and the community in carrying out the duties of her job.

17. Plaintiff's employment record at ACHS was exemplary, and she was never subjected to disciplinary actions. Instead, Plaintiff was showered with praise and accolades from her colleagues and the community, with respect to her work.

18. In December 2014, Gionni Thompson took over from Anthony Smith as the new ACHS principal, and Plaintiff's treatment at ACHS changed markedly. For example, immediately after Mr. Thompson started at ACHS, he refused to meet with Plaintiff to discuss her role and responsibilities within ACHS.

19. Mr. Thompson also intentionally excluded Plaintiff from attending informative meetings with the administrative and crisis team, which Plaintiff had previously attended. And, despite Plaintiff's qualifications, her impeccable work record, and love for her work, Mr. Thompson micromanaged Plaintiff's work and stripped her of her responsibilities, including

requiring her to seek approval where none was previously required and relegating her office to a smaller, less visible part of the ACHS building.

20. Ultimately, Mr. Thompson inserted Mr. Jose Guardiola, a Hispanic male, into roles previously designated to Plaintiff, effectively demoting Plaintiff by reducing her duty to a shell of what her job description and duties required.

21. Plaintiff complained about her treatment to Mr. Thompson as well as to her supervisors at the time. However, rather than Mr. Thompson addressing Plaintiff's complaint, Plaintiff was met with statements by Mr. Thompson that the "community needed to see Mr. Guardiola" in her role, and that Plaintiff needed to move her office or separate. Mr. Thompson even ignored one of Plaintiff's supervisor's written statement to Mr. Thompson about his unfair treatment of Plaintiff.

22. Mr. Thompson's less favorable treatment of Plaintiff culminated in a February 4, 2015 meeting in which Mr. Thompson told Plaintiff that he "saw no way out, but to separate." The following day on February 5, 2015, per Mr. Thompson's demand, Plaintiff reluctantly sent an email to Mr. Thompson regarding moving forward. On February 8, 2015, Mr. Thompson provided Plaintiff with a one-page Resignation and Release document.

23. On February 10, 2015, via e-mail to Mr. Thompson, Plaintiff questioned certain provisions of the Resignation and Release document.

24. Rather than responding to Plaintiff's concerns, Mr. Thompson stormed into Plaintiff's office on February 12, 2015 and informed her that she was being placed on a "non-disciplinary" administrative leave. Without any reason provided, Plaintiff was immediately escorted out of ACHS' premises in a humiliating fashion in plain view of her peers, co-workers, and students.

25. While Plaintiff was still on the non-disciplinary administrative leave, Plaintiff, through letters provided by her attorney on February 19, 2015 and March 17, 2015, notified Defendant of its illegal actions in violation of “federal and state statutes” and Plaintiff’s belief that she had been subjected to race and gender discrimination.

26. On March 24, 2015, Plaintiff brought her attorney to a meeting conducted by Defendant’s retained independent investigator. On April 20, 2015, Defendant issued its findings on its alleged investigation into Plaintiff’s allegations of race and gender discrimination. ACHS’ findings improperly dismissed Plaintiff’s allegations as “unfounded” and improperly categorized Plaintiff’s complaints merely as her “dissatisfaction with the difference in the [*sic*] Mr. Thompson’s expectations compared to those previously in place during the leadership of Mr. Thompson’s predecessor, Mr. Anthony Smith, at ACHS.”

27. On May 6, 2015, while still on the non-disciplinary administrative leave, Plaintiff received a Notice of Employment Termination letter advising her that Adams 14 was terminating her employment effective immediately.

VI. STATEMENT OF CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

(Race and Gender Discrimination in Violation of Title VII)

28. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set forth herein.

29. Because of her race and gender, Plaintiff is a protected person under Title VII.

30. At all times pertinent, Plaintiff satisfactorily performed the functions and requirements of her job.

31. During Plaintiff's employment, Defendant, and its agents, engaged in unlawful discriminatory employment practices against Plaintiff with respect to the terms and conditions of Plaintiff's employment based on her race and gender.

32. Defendant's unlawful employment practices include, without limitation, undue scrutiny and unfair criticism of Plaintiff's work, exclusion of Plaintiff from important administrative and crisis team meetings, discriminatory harassment of Plaintiff, unlawful suspension and termination of Plaintiff, which denied Plaintiff equal terms and conditions of employment and otherwise adversely affected her employment status because of her race and gender.

33. Other employees of different races, color or gender were not subjected to the scrutiny, criticism, discriminatory treatment, harassment, suspension and termination for the same actions as Plaintiff.

34. The stated reasons for Defendant's conduct were not the true reasons, but instead were pretext to hide Defendant's and/or its agents' discriminatory animus.

35. Defendant has a culture and practice of tolerating and approving widespread race and gender discrimination against Caucasians.

36. Defendant is liable for the acts and/or omissions of its agents and employees. Defendant either directly or by and through its agents, discriminated against Plaintiff because of her race and/or gender.

37. Defendant's unlawful employment practices complained of in the foregoing paragraphs were undertaken intentionally, maliciously, and/or with reckless indifference to Plaintiff's federally protected rights.

38. As a consequence of Defendant's illegal conduct, Plaintiff suffered, and continues to suffer, irreparable injury and damages.

SECOND CLAIM FOR RELIEF
(Retaliation in Violation of Title VII)

39. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set forth herein.

40. Plaintiff was subjected to retaliation because of her race and gender for engaging in opposition to discrimination, in violation of 42 U.S.C. § 2000e-3, including being discharged from her employment for complaining about her discriminatory treatment.

41. Defendant's asserted reasons for terminating Plaintiff were a pretext for illegal retaliation by Defendant and/or its agents.

42. Plaintiff's protected conduct in opposition to race and gender discrimination was a motivating factor in Defendant's retaliatory conduct and decision to terminate Plaintiff's employment with ACHS.

43. Defendant is liable for the acts and/or omissions of its agents and employees. Defendant either directly or by and through its agents, retaliated against Plaintiff because of her protected opposition to race and gender discrimination.

44. Defendant's unlawful employment practices complained of in the foregoing paragraphs were undertaken intentionally, maliciously, and/or with reckless indifference to Plaintiff's federally protected rights.

45. As a consequence of Defendant's illegal conduct, Plaintiff suffered, and continues to suffer, irreparable injury and damages.

THIRD CLAIM FOR RELIEF
(Violation of 42 U.S.C. § 1981 and Retaliation)

46. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set forth herein.

47. Plaintiff is Caucasian and thus a member of a protected class under 42 U.S.C. § 1981.

48. Defendant, by and through the conduct of their employees and agents, has unlawfully denied Plaintiff the benefits, privileges, promotional opportunities, and terms and conditions of her employment due to her race.

49. Mr. Thompson made explicit statements to indicate that Plaintiff's suspension and eventual termination was based on her race.

50. At all relevant times, Plaintiff performed the functions of her job competently and was qualified for the position of Communications Specialist at ACHS.

51. Defendant treated Plaintiff less favorably than similarly situated non-Caucasian counterparts.

52. Plaintiff was subjected to adverse treatment because of her race, including without limitation, to the denial of continued employment based on her race.

53. Plaintiff's race was a motivating factor in Defendant's suspension and termination of her employment.

54. Despite Plaintiff's qualifications and excellent performance of her duties, Defendant unduly scrutinized her work compared to non-Caucasian co-workers, excluded her from important administrative and crisis team meetings, unlawfully suspended and terminated her employment, while inserting non-Caucasian employees in her position.

55. Defendant's asserted reasons for terminating Plaintiff were a pretext for discrimination and illegal retaliation by Defendant and/or its agents.

56. Defendant has a culture and practice of tolerating and approving widespread race discrimination against Caucasians.

57. Defendant has engaged in a pattern and/or practice of race discrimination in the terms and conditions of employment against its employees, including, but not limited to, offering preferential treatment to Hispanics in employment and promotional opportunities.

58. Defendant is liable for the acts and/or omissions of its agents and employees. Defendant either directly or by and through its agents, retaliated against Plaintiff because of her protected opposition to race discrimination.

59. Defendant's unlawful employment practices complained of in the foregoing paragraphs were undertaken intentionally, maliciously, and/or with reckless indifference to Plaintiff's federally protected rights.

60. As a consequence of Defendant's illegal conduct, Plaintiff suffered, and continues to suffer, irreparable injury and damages.

FOURTH CLAIM FOR RELIEF
(Breach of Contract)

61. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set forth herein.

62. Plaintiff entered into an employment contract with Defendant to work as ACHS' Communications Specialist for 228 days – a period prorated to 216 days based on Plaintiff's start date. Pursuant to this contract, Plaintiff would remain employed at ACHS through June 27, 2015.

63. Plaintiff substantially performed her obligations under the contract.

64. Defendant failed to fulfil its obligations under the contract and breached the terms of its employment contract when it terminated Plaintiff's contract on May 6, 2015, before the contract end date.

65. As a consequence of Defendant's breach, Plaintiff suffered, and continues to suffer, irreparable injury and damages.

FOURTH CLAIM FOR RELIEF
(Promissory Estoppel)

66. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set forth herein.

67. As an integral part of ACHS' and Adams 14's Turnaround Plan, Defendant made representations to Plaintiff regarding the terms of her employment, including without limitation, that Plaintiff would remain employed at ACHS at least through 2016, when ACHS' Turnaround Plan would end.

68. Pursuant to Plaintiff's formal notification of employment letter from Defendant, dated August 12, 2014, which Plaintiff signed, Plaintiff's position was slated for 228 days per year with Adams 14, which provided for Plaintiff's first year employment end date with Adams 14 for on or around June 27, 2015.

69. Defendant knew or should have known that Plaintiff would rely on those representations.

70. Plaintiff relied and acted on Defendant's representations.

71. Plaintiff's reliance was to her detriment and she was damaged by such reliance.

72. Injustice can only be avoided by enforcing Defendant's representations.

73. As a consequence of Defendant's actions, Plaintiff suffered, and continues to suffer, irreparable injury and damages.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against the Defendant, and award her the following relief, to the fullest extent allowed by law:

- (a) Actual economic damages as established at trial;
- (b) Compensatory, including but not limited to future pecuniary and non-pecuniary losses, damages for emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other non-pecuniary losses;
- (c) Punitive damages on all claims allowed by law and in an amount to be determined at trial;
- (d) Attorneys' fees and the costs associated with this action, including expert witness fees, on all claims allowed by law;
- (e) Pre and post-judgment interest at the highest lawful rate;
- (f) Appropriate declaratory and other injunctive and/or equitable relief; and
- (g) Any further relief that this court deems just and proper, and any other relief as allowed by law.

PLAINTIFF REQUESTS A TRIAL TO A JURY ON ALL ISSUES SO TRIABLE.

Dated this 22nd day of November 2015.

Respectfully submitted,

MOUNTAIN WEST LAW GROUP, PC

s/Temitayo O. Okunade

Temitayo O. Okunade

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Attorney for Plaintiff

Plaintiff's Mailing Address:

Kathleen Autumn Jones

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Arvada, Colorado 80004

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
 Kathleen Autumn Jones

(b) County of Residence of First Listed Plaintiff Jefferson
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Temitayo "Tayo" O. Okunade
 Mountain West Law Group, PC
 10200 E Girard Avenue, Suite C250, Denver, CO 80231; (303) 440-7855

DEFENDANTS
 Adams County School District 14

County of Residence of First Listed Defendant Adams
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

(For Diversity Cases Only)

| | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|---|---|--|--|---|
| <input type="checkbox"/> 110 Insurance | <input type="checkbox"/> 310 Airplane | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 | <input type="checkbox"/> 422 Appeal 28 USC 158 | <input type="checkbox"/> 375 False Claims Act |
| <input type="checkbox"/> 120 Marine | <input type="checkbox"/> 315 Airplane Product Liability | <input type="checkbox"/> 690 Other | <input type="checkbox"/> 423 Withdrawal 28 USC 157 | <input type="checkbox"/> 400 State Reapportionment |
| <input type="checkbox"/> 130 Miller Act | <input type="checkbox"/> 320 Assault, Libel & Slander | | PROPERTY RIGHTS | <input type="checkbox"/> 410 Antitrust |
| <input type="checkbox"/> 140 Negotiable Instrument | <input type="checkbox"/> 330 Federal Employers' Liability | | <input type="checkbox"/> 820 Copyrights | <input type="checkbox"/> 430 Banks and Banking |
| <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment | <input type="checkbox"/> 340 Marine | | <input type="checkbox"/> 830 Patent | <input type="checkbox"/> 450 Commerce |
| <input type="checkbox"/> 151 Medicare Act | <input type="checkbox"/> 345 Marine Product Liability | | <input type="checkbox"/> 840 Trademark | <input type="checkbox"/> 460 Deportation |
| <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) | <input type="checkbox"/> 350 Motor Vehicle | LABOR | SOCIAL SECURITY | <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations |
| <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits | <input type="checkbox"/> 355 Motor Vehicle Product Liability | <input type="checkbox"/> 710 Fair Labor Standards Act | <input type="checkbox"/> 861 HIA (1395ff) | <input type="checkbox"/> 480 Consumer Credit |
| <input type="checkbox"/> 160 Stockholders' Suits | <input type="checkbox"/> 360 Other Personal Injury | <input type="checkbox"/> 720 Labor/Mgmt. Relations | <input type="checkbox"/> 862 Black Lung (923) | <input type="checkbox"/> 490 Cable/Sat TV |
| <input type="checkbox"/> 190 Other Contract | <input type="checkbox"/> 362 Personal Injury - Med. Malpractice | <input type="checkbox"/> 740 Railway Labor Act | <input type="checkbox"/> 863 DIWC/DIWW (405(g)) | <input type="checkbox"/> 850 Securities/Commodities/Exchange |
| <input type="checkbox"/> 195 Contract Product Liability | | <input type="checkbox"/> 751 Family and Medical Leave Act | <input type="checkbox"/> 864 SSID Title XVI | <input type="checkbox"/> 890 Other Statutory Actions |
| <input type="checkbox"/> 196 Franchise | | <input type="checkbox"/> 790 Other Labor Litigation | <input type="checkbox"/> 865 RSI (405(g)) | <input type="checkbox"/> 891 Agricultural Acts |
| REAL PROPERTY | CIVIL RIGHTS | <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act | TAX SUITS | <input type="checkbox"/> 893 Environmental Matters |
| <input type="checkbox"/> 210 Land Condemnation | <input type="checkbox"/> 440 Other Civil Rights | | <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) | <input type="checkbox"/> 895 Freedom of Information Act |
| <input type="checkbox"/> 220 Foreclosure | <input type="checkbox"/> 441 Voting | IMMIGRATION | <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609 | <input type="checkbox"/> 896 Arbitration |
| <input type="checkbox"/> 230 Rent Lease & Ejectment | <input checked="" type="checkbox"/> 442 Employment | <input type="checkbox"/> 462 Naturalization Application | | <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision |
| <input type="checkbox"/> 240 Torts to Land | <input type="checkbox"/> 443 Housing/Accommodations | <input type="checkbox"/> 465 Other Immigration Actions | | <input type="checkbox"/> 950 Constitutionality of State Statutes |
| <input type="checkbox"/> 245 Tort Product Liability | <input type="checkbox"/> 445 Amer. w/Disabilities Employment | | | |
| <input type="checkbox"/> 290 All Other Real Property | <input type="checkbox"/> 446 Amer. w/Disabilities Other | | | |
| | <input type="checkbox"/> 448 Education | | | |
| | | PRISONER PETITIONS | | |
| | | Habeas Corpus: | | |
| | | <input type="checkbox"/> 463 Alien Detainee | | |
| | | <input type="checkbox"/> 510 Motions to Vacate Sentence | | |
| | | <input type="checkbox"/> 530 General | | |
| | | <input type="checkbox"/> 535 Death Penalty | | |
| | | Other: | | |
| | | <input type="checkbox"/> 540 Mandamus & Other | | |
| | | <input type="checkbox"/> 550 Civil Rights | | |
| | | <input type="checkbox"/> 555 Prison Condition | | |
| | | <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | |

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Remanded from Appellate Court

4 Reinstated or Reopened

5 Transferred from another district (specify)

6 Multidistrict Litigation

7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, et seq. and 42 U.S.C. § 1981

Brief description of cause: AP Docket

Unlawful discrimination on the basis of race and sex in violation of 42 U.S.C. § 2000e, et seq.; Violation of Section 1981; Breach of Contract

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

DATE: November 22, 2016

SIGNATURE OF ATTORNEY OF RECORD: /s/ Temitayo O. Okunade

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____