

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 19-CV-02791  
(To be supplied by the court)

**FILED**  
UNITED STATES DISTRICT COURT  
DENVER, COLORADO  
DEC 09 2019  
JEFFREY P. COLWELL  
CLERK

Denise Michaelle Harper, Plaintiff

v.

Arrow Electronics,

Liberty Life Assurance Company of Boston,

Lincoln Life Assurance Company of Boston,

see attached, Defendant(s).

*(List each named defendant on a separate line. If you cannot fit the names of all defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section B. Do not include addresses here.)*

**EMPLOYMENT DISCRIMINATION COMPLAINT**

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

**A. PLAINTIFF INFORMATION**

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Debra M. Chaele Harper 19268 E Caspian Pl Aurora, Co 80013  
(Name and complete mailing address)

720-883-4386 deday71@gmail.com  
(Telephone number and e-mail address)

**B. DEFENDANT(S) INFORMATION**

Please list the following information for each defendant listed in the caption of the complaint. If more space is needed, use extra paper to provide the information requested. The additional pages regarding defendants should be labeled "B. DEFENDANT(S) INFORMATION."

Defendant 1: Arrow Electronics 9151 B Panorama Cir Englewood, Co 80112  
(Name and complete mailing address)

303-824-4000  
(Telephone number and e-mail address if known)

Defendant 2: Liberty Life Assurance of Boston DBA Liberty Life Assurance Co Box 7206 London, Ky 40742-7206 Company of Boston  
(Name and complete mailing address)

810-210-0268 GCP Complaints@ltg.com  
(Telephone number and e-mail address if known)

**C. JURISDICTION**

Identify the statutory authority that allows the court to consider your claim(s): (check all that apply)

Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, et seq. (employment discrimination on the basis of race, color, religion, sex, or national origin)

Americans with Disabilities Act, as amended, 42 U.S.C. §§ 12101, et seq. (employment discrimination on the basis of a disability)

Age Discrimination in Employment Act, as amended, 29 U.S.C. §§ 621, et seq. (employment discrimination on the basis of age)

Other: (please specify) Retaliation

**D. STATEMENT OF CLAIM(S)**

State clearly and concisely every claim that you are asserting in this action and the specific facts that support each claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "D. STATEMENT OF CLAIMS."

CLAIM ONE: Employment Discrimination Basis of Race, Color, sex + Age

The conduct complained of in this claim involves the following: (check all that apply)

- failure to hire
- different terms and conditions of employment
- failure to promote
- failure to accommodate disability
- termination of employment
- retaliation
- other: (please specify) \_\_\_\_\_

Defendant's conduct was discriminatory because it was based on the following: (check all that apply)

- race
- religion
- national origin
- Age
- color
- sex
- disability

Supporting facts:

Kim Griffin, Angela Gibson, Danni Decker fail to promote  
ARROW Electronics Company provide others EEO offer equal opportunity  
Discriminated based on my Age, Race, sex + color

Three co-workers were offered training hands on OR classroom  
from 10/17 - 3/19 Casey Gustafson, Matthew Parks + Kellie Beard  
10/23/17 3/18/19 were offered training of unit of Measure Conversions + Many other Accounts System

Class Room Trainings that would had benefited me

difference I noticed between my Co-workers OR Race, Color, sex + Age

I have bachelor of science technical report I trained all new hires  
why was I not offered the same equal opportunity as my co-workers  
over 3

2016 After Return From leave Kim Griffin ~~blacked~~ <sup>implied</sup>

~~was~~ Company network event I attended was for the millenials  
I dropped hrs claim conts work for Arrow Electronics, I was denied

2016 My medical records were released to Arrow Electronics

disability Company Lincoln Life Assurance of Boston. My Medical

Records indicate medical issues my physician did not make aware

I believe Arrow Electronics <sup>upper</sup> mgmt instructed Kim Griffin, Diana Decker  
to deny me opportunity stress + harrasment on the job hoped  
I would quit. four years later I found out about

my medical records & surgeons committ, I learned I was denied  
equal opportunity, I also learned Kim Griffin, Diana Decker,  
Angela Gibson Relatined against me from 10/23/17 - 3/23/19

By interfering with my professional growth <sup>down</sup> opportunities  
~~of~~ training that would benefited me. I believe I was unfairly  
treated because upper mgmt was informed by their disability

Company Lincoln Life Assurance of Boston DBA Liberty Life  
Assurance of Boston I would be disability ~~of~~ ~~company~~

~~because~~ I believe this is why I was targeted

Harrassed, Bullied + Reprimend. I Can present Medical Records

As ~~needed~~ ; when I Return From FMLA 2016, 2018 + 2019

I was discriminated against by Kim Griffin, Angela Gibson +

Diana Decker •

**E. ADMINISTRATIVE PROCEDURES**

Did you file a charge of discrimination against defendant(s) with the Equal Employment Opportunity Commission or any other federal or state agency? (check one)

Yes (You must attach a copy of the administrative charge to this complaint)

No

Have you received a notice of right to sue? (check one)

Yes (You must attach a copy of the notice of right to sue to this complaint)

No

**F. REQUEST FOR RELIEF**

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

ASK for relief of financial Damages : I lost my Home  
ASK for relief emotional + physical distressed  
ASK to relief of 4.5 million from Both companies involved

**G. PLAINTIFF'S SIGNATURE**

I declare under penalty of perjury that I am the plaintiff in this action, that I have read this complaint, and that the information in this complaint is true and correct. See 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

  
\_\_\_\_\_  
(Plaintiff's signature)

12/06/19  
\_\_\_\_\_  
(Date)

(Revised December 2017)

Employment discrimination Based on my age + race

CLAIM TWO: Employment discrimination on Basis of a disability

The conduct complained of in this claim involves the following: (check all that apply)

- failure to hire
- different terms and conditions of employment
- failure to promote
- failure to accommodate disability
- termination of employment
- retaliation
- other: (please specify) \_\_\_\_\_

Defendant's conduct was discriminatory because it was based on the following: (check all that apply)

- race
- religion
- national origin
- age
- color
- sex
- disability

Supporting facts:

Lincoln life Assurance Company of Boston DBA

Liberty life Assurance Company of Boston is employed

By AEROW Electronics to manage <sup>my</sup> Employee disability claims

I Request disability accommodations 5/27/19 Claims Denied By Shelby Lacouture From 5/27/19 - 10/23/19. I believe because I file discrimination complaint against AEROW out of Retaliation Lincoln life Assurance DBA Liberty life Assurance company of Boston denied my claims for Disability. Also My Medical Records From 2016 indicated Future Health Problems I Believe AEROW Electronics employee leave + Lincoln life Assurance company of Boston shared the information I would be a liability.

[Click Here for Additional Claim](#)

I also believe shelby Lacouture employee of  
Lincoln Life Assurance company of Boston DBA Lincoln  
Life Assurance company of Boston was told not to process  
my claims + Denied them 5/22/19 - 10/23/19. Caused  
me financial ruin, additional stress emotional + physical  
retaliation Both Companies wanted me removed from any  
future liabilities. The following people failed to provide  
bonafide disability accommodations at my disability request  
from 5/22/19 - 10/23/19 basis of my race + retaliation

Shelby Lacouture

Corie Callahan

Karen Drapeau

Carrie Harrington

***B. Defendants Lincoln Life Assurance representatives***

Liberty Life Assurance company of Boston  
Lincoln Life Assurance company of Boston

- Shelby Lacouture
- Corie Gillham
- Karen Drapeau
- Carrie Harrington
- Haley Smith

**Arrow Electronics Representatives**

- Diann Decker
- Kim Griffin
- Angela Gibson
- Kellye Beard
- Matthew Parks
- Elise Lieberman
- Andrea Miller
- Yaa Hammond
- Casey Gustafson

**Physicians:**

- Dr. Steve Stahl Arvada Family/New West primary Physician
- Dr. Kevin Davis Oncologist Swedish Hospital
- Dr Glenn Bigsby IV Do Colorado Gynecologic Oncology
- Dr. Ellice k Goldberg Internal Medicine

**Therapists**

Katie Gannon LCSW

Judy H Dewitt LCSW

Leslee Rewinkel, LPC



**Civil claim 19-CV-02791-GPG**

**B Defendant Information**

Teresa Rodgers ( Shared Svc Director)  
9151 E Panorama Cir  
Centennial, Co 80112

Diann Decker (Supplier Accounting Mgr)  
9151 E Panorama Cir  
Centennial, Co 80112  
[ddecker@arrow.com](mailto:ddecker@arrow.com)

Kim Griffin ( Supplier Accounting Supervisor)  
9151 E Panorama Cir  
Centennial, Co 80112  
303-824-4152 ; [kgriffin@arrow.com](mailto:kgriffin@arrow.com)

Andrea Miller  
9151 E Panorama Cir  
Centennial, Co 80112

Yaa Hammond ( Supplier Accounting Coordinator)  
9151 E Panorama Cir  
Centennial, Co 80112

Casey Gustafson ( Supplier Accounting Analyst)  
9151 E Panorama Cir  
Centennial, Co 80112  
303-704-4704 ; Casey [Gustafson@arrow.com](mailto:Gustafson@arrow.com)

Surendra Deora (IT)  
9151 E Panorama Cir  
Centennial, Co 80112  
[sedora@arrow.com](mailto:sedora@arrow.com)

Sagar Navandar (IT)  
9151 E Panorama Cir  
Centennial, Co 80112  
[snavandar@arrow.com](mailto:snavandar@arrow.com)

Tamara Geoffrion ( Asset Manager)  
9151 E Panorama Cir  
Centennial, Co 80112

Elise Lieberman ( Human Resource)  
9151 E Panorama Cir  
Centennial, Co 80112

303-824-4125 [elieberman@arrow](mailto:elieberman@arrow)

Jordan Price (Human Resource)  
9151 E Panorama Cir  
Centennial, Co 80112  
303-824-4152 ; [jordan.price@arrow.com](mailto:jordan.price@arrow.com)

Kelly Keys Arrow Employee Benefit  
9151 E Panorama Cir  
Centennial, Co 80112  
303-824-4023 [kelly.keys@arrow.com](mailto:kelly.keys@arrow.com)

Angela Gibson ( AP Manager)  
9151 E Panorama Cir  
Centennial, Co 80112  
303-704-4661; [angibson@arrow.com](mailto:angibson@arrow.com)

Kellye Beard (AP Analyst)  
9151 E Panorama Cir  
Centennial, Co 80112  
720-420-7636 ; [kellye.beard@arrow.com](mailto:kellye.beard@arrow.com)

Barbara Sandoval (AEP buyer)  
1501 Nolan Ran Expressway  
Arlington, TX 76011

Susan Barrett (AEP Purchasing)  
1501 Nolan Ran Expressway  
Arlington, TX 76011  
817-548-6701 [SBurton@aepetsche.com](mailto:SBurton@aepetsche.com)

Shalyn Hill ( AEP Asset Mgr)  
1501 Nolan Ran Expressway  
Arlington, TX 76011  
817-548-6729 [shill@aepetsche.com](mailto:shill@aepetsche.com)

Portia Banks (AEP Asset Mgr)  
1501 Nolan Ran Expressway  
Arlington, TX 76011  
817-548-6763 [PBanks@aepetsche.com](mailto:PBanks@aepetsche.com)

Matthew Parks ( AP Analyst)  
9151 E Panorama Cir  
Centennial, Co 80112  
[matthew.parks@arrow.com](mailto:matthew.parks@arrow.com)

Mark Lott ( AEP Buyer)  
9151 E Panorama Cir  
Centennial, Co 80112

**cont.**

**Civil claim 19-CV-02791-GPG**

**B Defendant Information**

Manisankar Prasaganthan (Arrow Intelligent systems)  
9151 E Panorama Cir  
Centennial, Co 80112

**B. Defendants Lincoln Life Assurance representatives**

Liberty life assurance company of Boston  
PO Box 7206 200-210-0268 Ext. \*16415.  
Lincoln Life Assurance company of Boston  
London, KY 40742-7206 200-210-0268 Ext. \*16415.

- Shelby Lacouture, P.O. Box 7213 London, KY 40742-7213 Disability Claim Case Manager, 200-210-0268 Ext. \*16415.
- Corie Gillham P.O. Box 7213 London, KY 40742-7213 Appeal Review Phone No 888- 437-7611 Ext. 41433
- Karen Drapeau P.O. Box 7213 London, KY 40742-7213 Disability Case Director, 200-210-0268 Ext. \*16135
- Carrie Harrington P.O. Box 7213 London, KY 40742-7213 Appeals Manager, 200-210-0268 Ext. \*16068
- Haley Smith P.O. Box 7213 London, KY 40742-7213

Physicians:

Dr. Steve Stahl Arvada Family/New West primary Physician 7950 Kipling St Arvada CO 80005  
(303) 425-4680 fax (303) 425-1616

Dr. Kevin Davis Oncologist Swedish Hospital  
701 E Hampden Ave Unit 210 Englewood, CO 80113 (303) 781-9090; fax (303) 781-8710

Dr Glenn Bigsby IV Do Colorado Gynecologic Oncology 7780 S Broadway Ste 300 Littleton CO 80122 (303) 955-7574 ;fax (720) 242-9307

Dr. Ellice k Goldberg Internal Medicine

12001 W 63rd Pl Arvada, CO 80004  
(303) 423-1360 fax (720) 464-6124

Therapists

Judy H Dewitt LCSW Psychotherapy  
1355 S Colorado Blvd ste 322  
Denver CO 80222

Leslee Rewinkel, LPC Psychotherapy  
1250 S Parker Rd  
Denver, CO 80231  
720-982-6614

Katie Gannon LCSW Psychotherapy  
6093 S. Quebec #100, Centennial CO 80111  
303-770-6933

EEOC Form 161-B (3/98)

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
**NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)**

To: Denise M. Harper  
19553 E. 57th Avenue Apt 202  
Aurora, CO 80019

From: Denver Field Office  
303 East 17th Avenue  
Suite 410  
Denver, CO 80203

On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No	EEOC Representative	Telephone No.
<b>541-2019-01677</b>	<b>Philip Gross, Enforcement Supervisor</b>	<b>(303) 866-1318</b>

(See also the additional information enclosed with this form.)

**NOTICE TO THE PERSON AGGRIEVED:**

**Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA):** This is your Notice of Right to Sue, issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

- More than 180 days have passed since the filing of this charge.
- Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.
- The EEOC is terminating its processing of this charge.
- The EEOC will continue to process this charge.

**Age Discrimination in Employment Act (ADEA):** You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

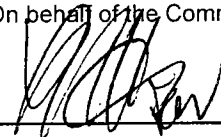
- The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.
- The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS from your receipt of this Notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office

On behalf of the Commission



**Amy Burkholder**  
Denver Field Office Director

**SEP 25 2019**

(Date Mailed)

Enclosures(s)

cc: Arrow Electronics Inc.

Enclosure with EEOC Form 161 (11/09)

**INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law. If you also plan to sue claiming violations of State law, please be aware that time limits and other provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS --**

**Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), or the Age Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later. Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

**PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):**

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit before 7/1/10 -- *not* 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

**ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:**

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

**ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:**

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

**IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.**

**PRIORITY MAIL**  
**MAIL** ★  
**EXPRESS**<sup>TM</sup>  
BEST SERVICE IN THE U.S.

USED INTERNATIONALLY,  
CUSTOMS DECLARATION  
FORM MAY BE REQUIRED.



July 2013 OD: 12.5 x 9.5



10001000006

**P**

US POSTAGE AND FEES PAID  
 PRIORITY MAIL  
 Dec 05 2019  
 Mailed from ZIP 28269  
 PM Flat Rate Env

CommercialBasePrice

071801356557

**PRIORITY MAIL 2-DAY**

denise harper  
 office of the clerk  
 19268 E CASPIAN PL  
 AURORA CO 80013 - 6208

C044 0006

637111418712496234

SHIP TO:  
 Office of the clerk  
 901.19TH ST  
 DENVER CO 80294 - 2500

USPS SIGNATURE TRACKING#

9410 8102 0082 9189 9705 96

INTERNATIONAL MAIL LABELS  
 DELIVERY DATE  
 DELIVERY TIME  
 KINGDOM INCLUDED  
 INCLUDED  
 AVAILABLE  
 INCLUDED UPON REQUEST

\* Money Back Guarantee to U.S., select APO/FPO/DPO, and select International destinations. See DMN and IMM at [pe.usps.com](http://pe.usps.com) for complete details.

+ Money Back Guarantee for U.S. destinations only.



**VISIT US AT USPS.COM**<sup>®</sup>  
ORDER FREE SUPPLIES ONLINE