

FILED  
U.S. DISTRICT COURT  
DISTRICT OF COLORADO

2020 MAY 29 PM 2:57

JEFFREY P. COLWELL  
CLERK

BY \_\_\_\_\_ DEP. CLK

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

Civil Action No. \_\_\_\_\_  
(To be supplied by the court)

Shanthea L. Wise, Plaintiff

v.

Megan J. Brennan,

Postmaster General,

United States Postal Services

\_\_\_\_\_, 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.

Shanhea Wize, 3718 E La Salle St Apt # 2112, Colorado Springs, CO 80909  
(Name and complete mailing address)

303-520-2663, bwize0408@starkstate.net  
(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: Megan J. Brennan/Postmaster General / USPS - 1-202-268-8091  
(Name and complete mailing address)

475 L'Enfant Plaza NW, Washington, D.C. 20260  
(Telephone number and e-mail address if known)

Additional Addresses for service of process:

Defendant 2: U.S. Attorney for the District of Colorado - Civil Process Clerk  
(Name and complete mailing address)

1801 California St # 1100, Denver, CO 80202  
(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) / Rehabilitation Act of 1973

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

Other: (please specify) The Pregnancy Discrimination Act  
2 (PDA) is amendment of Title VII of the Civil rights of 1964

## B. Defendant Information

Defendant 3: U.S. Attorney General  
950 Pennsylvania Ave. N.W  
Washington, D.C. 20530

**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: PDA is amendment to Title VII of the Civil Rights Act of 1964 / Disparate Treatment

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) Disparate Treatment

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

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

Supporting facts:

My name is Shaikhea Laghae Wise, I'm a woman that started working for the United States Postal Services (USPS) on November 3<sup>rd</sup> 2014 in Denver, Colorado. My title at the USPS was a City Carrier Assistant (CCA). I was a very good employee, that bring my great customer services experience into this job that I really loved, I never arrived to work late and, made every attempt to report to work everyday. I never received any verbal or written disciplinary action against me until after I notified management Hon Domingo and Dean Lego, and also Sandra Creek I was pregnant. I became pregnant around the date November 11<sup>th</sup> 2014, this makes me a member of the protected class under The Pregnancy Discrimination Act is amendment to Title VII of the Civil Rights Act of 1964 and also a member of the Americans with Disabilities Act of 1990. →

First Attachment for page 3

Additional paper for Claim One:

I'm an individual with a disability that because of my pregnancy did limited me to my daily activities even though I got pregnant I was qualified to do the essential elements with or without an accommodation, I was still able to do my job. Due to my pregnancy I had some difficulties that needed to be accommodated. I was required by my OBGYN doctor to not lift, push, or pull anything over 20 lbs. I notified managers Ron Domingo and Dean Lego the accommodation I needed due to my pregnancy. They started to help, and while helping me Dean Lego would complain and yell at me for asking for help lifting the bulks of mail in the gurney, pushing the gurney to my vehicle, and also help with loading my vehicle with the bulks of mail and packages. Ron Domingo would humiliate me by always calling me into his office several times a week and I was force to leave his office crying and to face everybody at South Denver Station. Ron told me to leave the heavy packages that are not being weighted, the ones I think that were heavy, I would leave the ones that were heavy and a couple of hours into my shift Ron Domingo would call me back to the station to deliver those same heavy packages. There were several employees that were given the accommodation and opportunity they asked for such as, a non-pregnant male employee Camaron White had the opportunity to start his probationary period over again with multiple disciplinary before his probationary ended, he was never terminated. It was two non-pregnant employees Danelle Martinez (female), and Joseph Encinias (male) were given a work restriction accommodation and was approved by management, they was able to get the accommodation, and never →

# Second Attachment for Page 3

## Additional Paper for Claim One:

were they terminated. This is discrimination. This was my experience as a pregnant woman while working for the U.S.P.S. I worked at the Capitol Hill Station from November 3<sup>rd</sup>, 2014 to December 1<sup>st</sup>, 2014 with management Sandra Creek and Sharon White. I was transfer to South Denver Station with management Ron Domingo and Dean Lego. My main station was at the Capitol Hill Station. On December 25<sup>th</sup>, 2014 that was the best day of my life, I find out I was pregnant. When I went into work on December 26<sup>th</sup>, 2014 I verbally told Ron Domingo I was pregnant. On December 29<sup>th</sup>, 2014 I gave Ron Domingo documentation proof of my pregnancy, the reason being I told Ron about my pregnancy so I can apply for health care insurance. Ron Domingo took the documentation and told me I had to report to the Tennyson Station with manager Sarah Washington and I notified her I was pregnant and Ron Domingo and Dean Lego have been harassing me after I notified them I was pregnant, I was really upset about it. That same day I also notified Wanda Harris about the harassment I was experiencing from Ron Domingo and Dean Lego, they both stated to not say anything and to keep working. On January 3<sup>rd</sup>, 2015 I called the work Hotline to notified managers Sandra Creek and Sharon White, I was having severe stomach pain and went to the hospital related to my pregnancy concerns. After leaving the hospital I went to the Capitol Hill Station to give Sandra Creek my work release form for that day showing why I was absent due to my severe stomach pain related to my pregnancy. At that time →

# Third Attachment for page 3

## Additional paper for Claim:

I asked Sandra Creek for the light duty paperwork form, Sandra Creek stated that I needed a doctors note first with my restriction before she can provide the light duty paperwork to me. I reported to work on January 12<sup>th</sup> 2015 and was having severe stomach pain again related to my pregnancy to were I was crying this was about three hours into my work shift. I asked Hon Domingo if I can leave early to go to the hospital, he was really upset and angry with me and gave me a hard time for trying to go to the hospital, he wrote me up for it. I came into work on January 13<sup>th</sup> 2015 to give Hon Domingo my work release form from the hospital. I had an OBGYN appointment with my doctor on January 15<sup>th</sup>, 2015, I explained to my doctor my daily job duties and my doctor gave me a no lifting, pushing, or pulling anything over 20lbs. work restriction; that same day I had to report to South Denver Station and I gave Hon Domingo a copy of my doctors work restriction. By this time the managers at South Denver Station and Capitol Hill Station were all aware of my pregnancy, and again I asked another post office management Hon Domingo for the light duty paperwork form and he had ignored my request and never provided me with the paperwork, he just gave me my work assignment. After I gave my doctors work restriction to Hon Domingo, I immediately started asking for help loading my vehicle with the bulks of mail, I asked Dean Lego if he can help, also help with pushing the gurney to the vehicle, he would make me cry and feel guilty because he was complaining and yelling at me about helping me with an accommodation I needed because I was pregnant, he would put me down by saying I'm not doing it right, he never said that before. I asked Hon Domingo if I can leave a couple of heavy →

# Fourth Attachment for page 3


## Additional paper for Claim One:

packages at the station to have another carrier deliver those heavy packages with a recommendation of Ron Domingo, he would say yes, and about two hours into my shift after leaving the station, Ron Domingo would call and punish me by having me come back to the station and deliver the same heavy packages I had left. No one was present to help me lift those heavy packages, I really needed help lifting those heavy packages. Ron Domingo and Dean Lego made me feel scared and guilty to ask for any more help because I was pregnant and I had work restriction that needed to be accommodated, Ron Domingo and Dean Lego did not want to help me. There were two other employees one male Joseph Encinas and a female employee Danelle Martinez they both got approved and was given the accommodation they asked for. Around January 18<sup>th</sup>-20<sup>th</sup> 2015, I finally asked the Union Steward Yvette Garcia at the South Denver Station for the light duty paperwork form, she provided the paperwork to me that same day. The light duty paperwork was submitted to my OBGYN doctor, I had asked Ron Domingo for the office fax number so my doctor can fax over the light duty paperwork to Ron Domingo I provided the fax number to my doctor. I called my doctor's office on January 28<sup>th</sup> 2015 to see if they had faxed over the light duty paperwork they stated that it was a unsuccessful attempt on January 20<sup>th</sup> 2015, they tried again on January 28<sup>th</sup> 2015 and it was two unsuccessful attempts, I went to talk to Ron Domingo to get the fax number again, he provided me with the correct fax number. It was a delay with the paperwork (light duty) because Ron Domingo had provided me the wrong fax number. On December 1<sup>st</sup> 2015 is when I received my first 30 day evaluation for the month of November, it was done by Ron Domingo not Sandra Creek I did not →



Fifth Attachment for page 3

Additional paper for claim one:

work with Ron Domingo directly until December 1<sup>st</sup>, 2014. I was working with Sandra Creek the month of November. Never once did management officials say anything verbally or written about my performance or any improvements on my performance and received compliments with a positive review. I received my 60 day evaluation dated December 31<sup>st</sup>, 2014 after I notified management I was pregnant, I received nothing but negative performance review; and I also let Sarah Washington know I was being harassed by Ron Domingo and Dean Lego on December 29<sup>th</sup>, 2014, days before my 60 day evaluation. I never received my 90 day performance evaluation, I was wrongfully terminated right before my 90 day probationary period was to end. It was a male employee Camaron White had the opportunity to start his probationary period over again, he had multiple disciplinary action before he started his probationary period over for the second time. I always came into work crying and also crying in the work car saying to myself why am I being treated different, I was really hurt. One day Danelle Martinez at the South Denver Station seen me crying I was so embarrassed and she came to me and comfort me, I explained to her what was happening and how Ron Domingo and Dean Lego was mistreating and harassing me. On January 17<sup>th</sup> 2015 two days after I gave Ron Domingo my doctors work restriction, Ron Domingo conducted an investigative interview for the unscheduled absences and I explained to Ron Domingo for the reasons for being absents related to my pregnancy and provided documentation. After January 12<sup>th</sup>, 2015 I have not had another unscheduled absence, I improved on the area and still received negative disciplinary 

# Sixth Attachment for Page 3

## Additional paper for Claim One:

action leading to my termination. On January 21<sup>st</sup>, 2015 the beginning of my shift, Hon Domingo again called me into his office and issued me a Letter of Warning for the unschedule absence. I cried to Hon Domingo explaining what happened and that I went to the hospital related to my pregnancy, he just looked at me showing no concern and told me I had to go to the Westwood Station with manager Anita Chavez, it was about an hour away from South Denver Station. It was a very cold and the snow was coming down really hard. I did not have the proper equipment for the weather because I have not completed my probationary period at that time to receive my work allowance. I left Hon Domingo office crying and couldn't understand why this was happening to me. Hon Domingo and Dean Lego really made me doing my job really hard. I arrived to the Westwood Station about an hour and a half late, Anita Chavez was never informed that I was taking the bus everywhere until I arrived. I let Anita Chavez see a copy of my work restriction and also informed her I was pregnant, she can tell that I have been crying and was upset. Anita Chavez assigned me with another Carrier (CCA) Graham Porter, he had been that I did not have the proper gear for the weather and he had offered me to use his military snow boots. Myself and Graham Porter started to go on the route to deliver the mail, about 10-15 minutes after leaving the station. I started to cry again, I was so tired of being treated differently because I was pregnant. I had notified a few employee and a manager that I →

# Seventh Attachment for page 3

## Additional paper for Claim One:

was being harassed and nothing has change, things were getting worst ever since I told them about the harassment. I asked Graham Porter to take me back to the Westwood Station so I can talk to Anita Chavez. I wanted to talk to her because since she was a woman she will understand me and what was happening and why it was happening. I was seeking guidance and help from Anita Chavez because no one was listening and I did not know what to do. I arrived back to the Westwood Station to talk to Anita Chavez about the situation, about Ron Domingo and Dean Lego harassing me, and how they were making my job really hard for me, she really didn't give any feedback. After about 30 minutes of talking to Anita Chavez, I was force to resign from previous events that occurred. With the recommendation of Anita Chavez and the managers at South Denver Station, Anita Chavez provided me with the resignation paperwork. I filled the paperwork out, I signed the form and Anita Chavez signed the form she had asked me for my badge, I gave it to her and left and returned back to the hostel hotel, where I have been living during that time. I received a call/voicemail later on that day from Wanda Harris (Capitol Hill Station Collections) saying if I want my job back call her right away. The beginning of the day on January 21<sup>st</sup>, 2014 I notified Wanda Harris again I was being harassed and asked her what my rights were, she just told me to keep working



# Eighth Attachment for page 3

## Additional paper for Claim one:

and don't say anything. I had a conversation with Kieve Johnson (My ~~Partner~~ <sup>Partner</sup>) and how we can make this work. I called Wanda Harris back because I loved my job and wanted to make it work, I was homeless and wanted to provide for my child, and prove that I can do it. Wanda Harris got me in touch with Sharon White I explained to her why I resigned due to Ron Domingo and Dean Lego harassing me and making my job really hard and not giving me my accommodation I needed. She explained to me was to get in touch with Theresa Bianchi (the postmaster general) she is also the one that hired me and Theresa Bianchi would help me retract my resignation. Sharon White ignored the fact I told her about the harassment. On January 22<sup>nd</sup>, 2015 I called Theresa Bianchi and she explain to me how to retract my resignation. I typed the letter at the public library, I walked to the Capitol Hill Station and asked Sandra Creek to fax over the retracting resignation letter to Theresa Bianchi it was received to her that same day, later on that day I received a phone call from Ron Domingo to report at the South Denver Station the next morning on January 23<sup>rd</sup>, 2015. The next morning on January 23<sup>rd</sup>, 2015 I worked my full shift and Ron Domingo and Dean Lego called me into the office to issued me a Letter of warning for missed scanned packages. On January 13<sup>th</sup>, 2015 an investigative interview was conducted for the missed scanned packages on January 10<sup>th</sup>, 2015. I improved on my scanning and did not



# Ninth Attachment for Page 3


## Additional paper for Claim One.

missed another scanned package, and I still received a negative disciplinary action against me, leading to my termination. I did not understand why did I received a letter of warning so late and I received my copy and lefted his office crying again. January 27<sup>th</sup>, 2015 Hon Domingo and Dean Lego conducted an investigative interview for resigning forcefully, they stated I failed to follow supervisor Anita Chavez instruction for not going to deliver the mail after I resign. I explain to Hon Domingo and Dean Lego I did not failed to follow supervisor instruction, I had resign and retracted my resignation with Theresa Bianchi and I felt overwhelmed related to my pregnancy. I expressed to Hon Domingo that I would like to speak to John McLucas - he was Hon Domingo supervisor at that time. I was going to tell John McLucas how Hon Domingo and Dean Lego was treating me unfair and also about the harassment I was experiences. Hon Domingo refused to give me John McLucas contact information, he stated he did not feel comfortable giving me his contact information, he stated he will pass my information to him, I never got a chance to speak with John McLucas. Hon Domingo and Dean Lego called me into the office along with the Union Steward Yvette Garcia after working my full shift on January 29<sup>th</sup>, 2015 to issue me a Seven Day In house suspension for the →

# Tenth Attachment for page 3

## Additional paper for Claim One:

Westwood incident for resigning on January 21<sup>st</sup>, 2015 related to my pregnancy I left the office crying again. On January 30<sup>th</sup>, 2015 I worked my full shift and was done for the day, I had clocked out and left to go catch the bus to the hostel hotel. While on the bus on my way to the hostel hotel, I received several calls from Ron Domingo, I answered the phone and Ron Domingo asked me to return back to the station. I asked him what did I do wrong, and I was across town on the bus, he said nevermind and okay then hung up on me. Before I could clock in on January 31<sup>st</sup>, 2015 Ron Domingo and Dean Lego called me into the office to issue me a Notice of Separation dated January 30<sup>th</sup>, 2015. I asked if I can make a copy and give it to the Union Steward Yvette Garcia, they was being very rude and refused, then they told me to leave right now, I was so hurt and embarrassed, I left the building crying. One I was terminated I had no job or any money, I had no choice but to moved back to Ohio homeless. For almost the whole year of 2015 I was homeless. I was so scared to face my family, I lost a really good job. It took me a long time to seek counselor help because I felt like I can fix my depression by replacing the Post office job with another job, that was not the case. I fell more into a depression state to were I had to seek counselor help. I lost the enjoyment of life, I did not want to be around family and friends and was becoming more distance from everything. I have been trying to get back what I lost at the Post Office since the



# Eleventh Attachment for page 3

## Additional paper for Claim One:

termination. I lost my dignity as a person and as a worker. I questioned myself as a worker, am I good enough to be here. Enough was enough I finally seek counselor help in 2018 in the month of August after graduating school and couldn't find a job. My counselor had suggest I take Zoloft (Antidepressants medication), I started to take the medication because I was diagnosis with PTSD and major depressive disorder and it was starting to help me. I finally found a job as a Certified Medical Assistant at a Heart Center in Ohio and I felt the same way I did at the post office they, I felt like they were harassing me and out to get me, I resign from there, the same thing happened at my next job. The last five years since my termination have been the worst five years I had to experience in my life. I have fell out with so many friends and family members in my life because I'm ashamed to face them and there judgement. I moved back to Colorado in 2019, I got a job at UHealth I started to feel the same way again, I decided to take some time off to seek counselor help again instead of resigning. It really has been helping again, I'm back on my medication trying to recover from the trauma I experience at the Post Office.

## Statement of Claims: D

### Claim Two: PDA is amendment of Title VII of the Civil Rights Act of 1964: Hostile Work Environment / Harassment

All previous allegations incorporated here.

- ① Starting December 29<sup>th</sup>, 2014 I notified Sarah Washington and Wanda Harris that I was being harassed by Ron Domingo and Dean Lego after I notified them I was pregnant, they would say don't say anything and to keep working.
- ② After I told Wanda Harris and Sarah Washington about the harassment everything was getting worse, I kept receiving multiple disciplinary action, I received negative performance review. Management never said anything verbally about my performance or any improvement on my performance, I was forced to resign. Wanda Harris, Sharon White, and Theresa Bianchi recommended I retract my resignation, a week later I was wrongful terminated, among other things
- ③ On January 21<sup>st</sup>, 2015 I notified Wanda Harris, Sharon White, and Anita Chavez I was being harassed by Ron Domingo and Dean Lego because I was pregnant. Sometime in the beginning of January I also notified Danelle Martinez I was being harassed by Ron Domingo and Dean Lego.



Statement of Claims: D

First Additional pages for Claim Two

Claim Two: PDA is amendment of Title VII of the Civil Rights Act of 1964: Hostile Work Environment / Harassment

④ Hon Domingo would humiliate me in front of everybody by having me crying leaving his office. Both Hon Domingo and Dean Lego made working really hard for me to where I was crying everyday when I came into work. I was forced to work out of my work restriction because Dean Lego would yell and put me down about helping with my work restriction accommodation. Hon would say it was okay to leave a heavy package back at the station, he would call me to come back and deliver those same heavy packages. I was too embarrassed to ask for anymore help. It was so severe and pervasive for me that it alter my employment condition. I was targeted because I was pregnant and I was the only one pregnant at that time

⑤ This was discrimination

Statement of Claims: D

Claim Three: PDA is amendment of Title VII of the Civil Rights Act of 1964: Failure to Accommodate

All previous allegations incorporated here.

① Under the second clause of the PDA, I'm an individual that belongs to a protected class, I'm a woman that became pregnant.

including

② I did sought for an accommodation, I requested for the Light Duty paperwork form, and I also gave management my OBGYN doctor work restriction accommodation, other requested are described.

③ I did not received or get approved for my work restriction accommodation related to my pregnancy. My doctor put me on a no lifting, pushing, or pulling anything over 20lbs., work restriction. They did accommodate me. They denied my accommodation, As described above. They wrote me up and fired me

④ Ron Domingo and Dean Lego gave the accommodation to a few employees that asked for the accommodation and got approved and were able to still work. Even though I became pregnant I still had the ability to do my job with or without an accommodation.

⑤ This was discrimination

## Statement of Claims: D

Claim Four: PDA is amendment of Title VII of the Civil Rights Act of 1964: Retaliation

All previous allegations incorporated here.

- ① I was engaged an protected activity/class I was a woman that was pregnant, that bought an accommodation, and also was discriminated against me for asking for an accommodation.
- ② The management were aware of my pregnancy and and that I'm apart of a protected activity class, and I'm a woman, As described above.
- ③ I first notified Sarah Washington and Wanda Harris about the harassment on January 28<sup>th</sup>, 2015, soon as I told about the harassment, every thing was getting worst. The managers Ron Domingo and Dean Lego started taking adverse action towards me once I notified management of my pregnancy. I received negative performance review, Ron Domingo would punish me by having me come back to the station and deliver the heavy package when he said it okay to leave them the first time. They punish me and embarrassed me for notified Sarah and Wanda about the harassment. Giving other employees the work accommodation, I was force to resign due to the hardship Ron Domingo and Dean Lego caused for me. I received multiple disciplinary action leading to my wrongfully termination.

## Statement of Claims: D

First Additional pages for Claim Four

Claim Four: PDA is amendment of Title VII of the Civil Rights Act of 1964: Retaliation

④ The causal connection between the protected activity and the adverse treatment, the management were aware of my pregnancy and I told Anita Chavez, Sharon White, Wanda Harris, and Sarah Washington about the harassment before I resign and I also asked Wanda Harris what my rights were and she never told me what my rights are. Ron Domingo and Dean Lego have been taking adverse action towards me once I notified Sarah Washington and Wanda Harris about the harassment related to my pregnancy. Wanda Harris, Sharon White, and Theresa Bianchi wanted me to retract my resignation to retaliate against me to get me terminated because I was pregnant. As described above

⑤ This was discrimination

Statement of Claims: D

Claim Five: ADA/Rehabilitation Act - Disparate Treatment

All previous allegations incorporated here.

- ① Incorporate all allegations from Claim One
- ② I'm an individual with a disability person within the meaning of the Statute
- ③ I was qualified with or without reasonable accommodation, to perform the essential functions of the job held at the Post office
- ④ I suffered an adverse action from my employer, I received write-ups, I ask for an accommodation and did not get that accommodation, there were multiple employee ~~qa~~ that received the accommodation, ~~as~~ as described above

Statement of Claims: D

Claim Six: ADA/Rehabilitation Act - Hostile Work Environment / Harassment

All previous allegations incorporated here.

- ① Incorporated all allegations from Claim Two
- ② I qualified as a individual with a disability, I was a pregnant woman asking for an accommodation
- ③ I was subjected to unwelcomed harassment because I was asking for an accommodation, I was being targeted because I was pregnant, I was being treated differently for asking for an accommodation
- ④ The harassment was based on <sup>my</sup> disability
- ⑤ The harassment was sufficiently severe and pervasive to alter my employment with multiple write-ups to being fired, as described above
- ⑥ The factual basis exists to impute liability for the the harassment, I was being targeted because I was pregnant.

## Statement of Claims: D

### Claim Seven: ADA/- Failure to Accommodate Rehabilitation Act

All previous allegations incorporated here.

- ① I participated in a protected activity I was an individual with a disability, I became pregnant
- ② I was qualified to perform the essential elements with or without an accommodation
- ③ My disability can be accommodate, I never received the accommodation.
- ④ The managements at Post office knew about my pregnant disability.
- ⑤ The management failed to give me the accommodation I needed and requested for, since they know of my disability they took adverse action against me and wrongfully terminated me
- ⑥ This was discrimination

Statement of Claims: 13

Claim Eight: ADA/Rehabilitation Act - Retaliation

All previous allegations incorporate here.

- ① Incorporate all allegations from Claim Four
- ② I engaged in a protected activities, I was pregnant, and I asked for an accommodation
- ③ The Post office were aware of my pregnancy and the accommodation
- ④ I did subjected to adverse treatment, I did received the accommodation, related to my pregnancy, manager kept writing me up, other employees were given the accommodation they requested
- ⑤ The causal connection exists between the protected activity and the adverse treatment because the management knew I was pregnant and asked for an accommodation, they targeted me because I was the only pregnant and they denied my accommodation.



**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."*

*(See attached page)*

**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.

Shakha Wise  
(Plaintiff's signature)

5-29-2020  
(Date)

(Form Revised December 2017)

## F. Request for Relief

A. Compensatory damages, including, without limitation, those for past and future pecuniary and non-pecuniary losses, pain and suffering, emotional distress, Impairment of quality of life

B. Any fee's and cost associated with this action

C. Actual economic damages as established at trial

D. I am requesting a motion to appoint counsel to represent me due to the nature and complexity for the remaining of this case

E. I would like my job back

F. Such further relief as justice requires

\* DEMAND JURY TRIAL ON ALL ISSUES SO TRIABLE\*



**EEO Dispute Resolution Specialist's (DRS) Inquiry Report**

4E-800-0052-15

**NOTICE OF RESTRICTED USAGE**

Access to, and usage of, this EEO report is restricted by both the Freedom of Information Act and the Privacy Act to: (1) the complainant and his or her representative, and (2) government officials who must have access to the files to discharge their OFFICIAL duties. The report must be safeguarded. Willful violations of these requirements are subject to criminal penalties [5 U.S.C. 552a(f)].

**Complainant**

Name (Last, First, MI) <b>Wise, ShaRhea L.</b>		SSN or EIN <b>EIN: 04356347</b>	
Home Address (No., Street, City, State, ZIP + 4®) <b>1402 13th St SE Canton, OH 44707-3432</b>		Work Address (Facility Name, No., Street, City, State, ZIP + 4®) <b>Capitol Hill - Denver 1551 Downing St., Denver, CO, 80218-9998</b>	
Home Telephone No. <b>303-520-2663</b>	Email Address <b>swise0408@starkstate.net</b>	Office Telephone No. <b>303-860-7954</b>	
Position Title <b>City Carrier Assistant (CCA)</b>	Grade Level <b>CC-01</b>	Tour <b>2</b>	Duty Hours <b>8:00 AM - 4:30 PM</b>
Off Days (For Tour 1, record nights off) <b>Sun/Rotating</b>	Is EEO Poster 72 on display in Complainant's facility? <input checked="" type="checkbox"/> Yes, verified on (date): <b>2/25/2015</b> <input type="checkbox"/> No		
Preference Eligible <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Mixed Case <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MSPB Appeal Filed? <input type="checkbox"/> Yes If Yes, Date Filed: <input checked="" type="checkbox"/> No	

**Chronology of Internal Process**

Date(s) of Incident <b>Nov 21, 2014 / Dec 1, 19 &amp; 31, 2014 / Jan 15, 21, 23, 29 &amp; 31, 2015</b>	Date of Initial Contact with EEO Office <b>2/6/2015</b>	Date of Initial Interview <b>2/25/2015</b>
REDRESS® Overview <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADR Election Form Signed <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	60 Day Extension Form Signed <input checked="" type="checkbox"/> Yes, Expiration Date: <b>5/7/2015</b> <input type="checkbox"/> No
Date Complainant Signed or Received Notice of Right to File <b>3/23/2015</b>	Date DRS Report Requested <b>4/7/2015</b>	Date DRS Report Submitted <b>4/14/2015</b>

**Basis for Alleged Discrimination**

Check and Particularize Each that Applies

<input type="checkbox"/> 1. Race (Specify):	<input type="checkbox"/> 6. Age (Specify Date of Birth):
<input type="checkbox"/> 2. Color (Specify):	<input type="checkbox"/> 7. Physical Disability (Specify):
<input type="checkbox"/> 3. Religion (Specify):	<input type="checkbox"/> 8. Mental Disability (Specify):
<input checked="" type="checkbox"/> 4. Sex (Specify): <b>pregnancy</b>	<input type="checkbox"/> 9. Genetic Information (Specify):
<input type="checkbox"/> 5. National Origin (Specify):	<input type="checkbox"/> 10. Retaliation (Specify Cited Protected EEO Activity):

**Discrimination Claim(s):**

**Counselee alleges discrimination based on sex, when:**

- (1) During or around November 21, 2014, she was not paid for one week of training;
- (2) During or around early December 2014, she was transferred to another station;
- (3) On December 1 & 31, 2014, she received unsatisfactory 30- and 60-day evaluations;
- (4) During or around December 19, 2014, and January 15, 2015; her requests for reasonable accommodation involving her pregnancy were denied;
- (5) On January 21, 2015, she received a Letter of Warning (LOW) charging Failure to be Regular in Attendance;
- (6) On January 23, 2015, she received a LOW charging Unacceptable Work Performance;
- (7) On January 29, 2015, she received a 7-day suspension charging Failure to Follow Instructions; and
- (8) On January 31, 2015, she received a Letter of Separation charging Unacceptable Work Performance.

**RECEIVED  
APR 16 2015  
NFFO/BO**

**Requested Resolution:**

In resolution to this complaint, Counselee seeks (1) to be immediately restored to Capitol Hill or a Colorado Springs Office as a Postal Support Employee (PSE); (2) to maintain her relative standing; and (3) pay for lost wages.

Counselor's Report  
Page 1 of 53

EEO Dispute Resolution Specialist's Checklist

Please check All That Apply.

- 1. I informed counselee of the impartial role of the Dispute Resolution Specialist in the EEO complaint process, explained the EEO process, and provided counselee with the booklet, *What You Need to Know About EEO – an overview of the EEO process in the Postal Service™*.
- 2. I notified counselee of his/her right to be accompanied, represented, and advised by a representative of his/her choice at any stage in the complaint process. If counselee elected representation, I obtained the following information:

Representative's Name: None Designated

Title: \_\_\_\_\_ Telephone No.: \_\_\_\_\_

Fax No. \_\_\_\_\_ Email Address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

- 3. I advised counselee of his/her right to remain anonymous during pre-complaint counseling and he/she DID  / DID NOT  waive anonymity.
- 4. I explained the Privacy Act Statement. Counselee signed a copy of the notice prior to the interview.
- 5. If a mixed case, I informed counselee of the mixed case election procedures in 29 C.F.R. §1614.302.
- 6. If age discrimination was alleged, I informed counselee of the alternate procedures available for pursuing age claims, as outlined in 29 C.F.R. §1614.201.
- 7. If a sex based claim of wage discrimination was alleged under Equal Pay Act (EPA), I advised counselee of his/her right to bypass the administrative procedure and file a civil action, as outlined in 29 C.F.R. §1614.408.
- 8. If discrimination based on disability was alleged I informed counselee of his/her requirement to submit documentation of his/her disability. Documentation HAS  HAS NOT  been submitted.
- 9. If counselee presented his/herself as an agent of a class, I explained the class complaint procedures and the class agent's responsibilities, as outlined in 29 C.F.R. §1614.204.
- 10. I informed counselee of his/her requirement to immediately notify the NEEOISO-EEO Contact Center and the EEOC if the representative's or his/her mailing address change.
- 11. I explained that I will not be the one who will make the decision on the acceptability of counselee's claim(s); but, there is a possibility that, for the reason(s) I have briefly restated below, the claim(s) will be dismissed in accordance with 29 C.F.R. 1614.107.

Counselee was advised that her complaint may be subject to dismissal based on a failure to comply with applicable time limits.



**EEO Complaint of Discrimination in the Postal Service**  
(See Instructions and Privacy Act Statement on Reverse)

1. Name <b>ShaRhea L. Wise</b>		2. SSN or EIN <b>235-39-8674</b>	3. Case No. <b>4E-800-0052-15</b>
4a. Mailing Address (Street or P.O. Box) <b>1402 13th St. S.E.</b>		4b. City, State, and Zip + 4 <b>Canton, OH 44707</b>	
5. Email Address <b>swise0408@starstate.net</b>		6. Home Phone <b>(303) 526-2663</b>	7. Work Phone <b>( )</b>
8. Position Title (USPS Employees Only) <b>CCA</b>	9. Grade Level (USPS Employees Only)	10. Do You Have Veteran's Preference Eligibility <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11. Installation Where You Believe Discrimination Occurred (Identify Installation, City, State, and Zip+4) <b>South Denver Station Denver, CO 80223</b>		12. Name & Title of Person(s) Who Took the Action(s) You Alleged Was Discriminatory <b>Ron Domingo</b>	
13a. Name of Your Designated Representative <b>Kieve Johnson</b>		13b. Title	
13c. Mailing Address (Street or P.O. Box) <b>2359 Lexington VII. Ln.</b>		13d. City, State, and Zip + 4 <b>Colorado Springs CO 80916</b>	
13e. Email Address <b>Kjohnson@318@starstate.net</b>		13f. Home Phone <b>(303) 522-1163</b>	13g. Work Phone <b>( )</b>

Providing this information will authorize the Postal Service to send important documents electronically.

14. Type of Discrimination You Are Alleging <input checked="" type="checkbox"/> Race (Specify): <b>African American</b> <input checked="" type="checkbox"/> Color (Specify): <b>African American</b> <input type="checkbox"/> Religion (Specify): <input type="checkbox"/> National Origin (Specify):		<input checked="" type="checkbox"/> Sex (Specify): <b>Pregnancy</b> <input type="checkbox"/> Age (40+) (Specify): <input type="checkbox"/> Retaliation (Specify Prior EEO Activity): <input type="checkbox"/> Disability (Specify): <input type="checkbox"/> Genetic Information (Specify):	18. Date on Which Alleged Act(s) of Discrimination Took Place <b>12-29-14</b>
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16. Explain the specific action(s) or situation(s) that resulted in you alleging that you believe you were discriminated against (treated differently than other employees or applicants) because of your race, color, religion, sex, age (40+), national origin, genetic information, disability, or retaliation for participation in a protected EEO activity. Note that if your allegation is like or related to a previous complaint, that complaint may be amended. 29 C.F.R. § 1616.106(d)

On 12-29-2014 Ron Domingo had receive my form stating about my pregnancy. The beginning of January, Ron has been harrasing with back to back write-ups. He did receive a fax from my doctor stating my restriction on Jan 15<sup>th</sup> and Jan 28<sup>th</sup> and I didn't receive the reasonable accommodation.

17. What Remedy Are You Seeking to Resolve this Complaint?  
I'm looking to get my job back; All lost wages; compensation for pain and suffering; Being statement of relative standing.

18. Did You Discuss Your Complaint with a Dispute Resolution Specialist or a REDRESS Mediator?  
 Yes (Date you received the Notice of Final Interview): **03-09-2015**  No

**APR 08 2015**  
**NEBO160**

19a. Signature of Dispute Resolution Specialist 	19b. Date <b>03/20/2015</b>
20. Signature of Complainant or Complainant's Attorney 	21. Date of this Complaint <b>04/01/2015</b>

00040



# Notice of Right to File Individual Complaint

TO: Name (First, MI, Last)

Re: Case No.

ShaRhea L. Wise

4E-800-0052-15

This notice will attest to the fact that on 3/20/2015, I advised you of the actions taken concerning the alleged discrimination that you brought to my attention. If the matters that you raised during the pre-complaint processing stage have not been resolved, you have the right to file a formal complaint within 15 calendar days of the date you receive this notice. If you decide to file a formal complaint, your complaint must be put in writing and signed by you or your attorney, if you retained one to represent you. I am providing you with PS Form 2565, EEO Complaint of Discrimination in the Postal Service, for this purpose. Your complaint must be delivered to:

NEEOISO – Formal Complaints  
 U.S. POSTAL SERVICE  
 P.O. BOX 21979  
 TAMPA FL 33622-1979

RECEIVED  
 APR 06 2015  
 NEEOISO

Your complaint will be deemed timely filed if it is received at this address before the expiration of the 15-day filing period, or if it bears a postmark that is dated before the expiration of the filing period. In the absence of a legible postmark, it must be received by mail within 5 calendar days of the expiration of the filing period.

An EEO discrimination complaint can be processed only if the complainant alleges he or she has been discriminated against on the basis of race, color, religion, sex, national origin, age (40+), disability, genetic information, or retaliation for participation in protected EEO activity. In addition, courts have ruled the complainant has the burden of presenting evidence which would give rise to an inference of discrimination. A complaint must contain the following information:

- (1) Your name, address, position, and level;
  - If you change your address, you have a regulatory requirement to immediately report the change to the address below: NEEOISO-EEO Contact Center, U.S. Postal Service, P.O. Box 21979, Tampa FL 33622-1979
- (2) The specific action or matter complained of, the date of occurrence, and the name(s) of the official(s) who took the alleged discriminatory action at issue in this complaint;
- (3) The specific type of discrimination alleged, (e.g., race – African American, sex – female);
  - If you allege disability discrimination, the alleged disability must be more than a temporary condition.
  - If you allege age discrimination, you must have been at least 40 years of age on the date the alleged discriminatory action occurred.
- (4) A brief statement of the facts that led you to believe you were discriminated against and the names of similarly situated individuals whom you believe were treated differently than you.
  - If you allege a failure to accommodate a disability or your religion, you must explain the accommodation sought and why you sought it.
  - If you allege retaliation, you must show a connection between the action about which you are complaining and your participation in protected EEO activity. You must also show when the alleged discriminatory action at issue in this complaint occurred, and that the management official who took the action was aware that you had previously engaged in protected activity.
- (5) The name of the EEO Dispute Resolution Specialist who provided you with this notice and the date you received this Notice of Right to File.

Privacy Act Statement

Privacy Act Statement: Your information will be used to adjudicate complaints of alleged discrimination and to evaluate the effectiveness of the EEO program. Collection of this information is authorized by 39 U.S.C. 401, 409, 410, 1001, 1005, and 1208. Providing the information is voluntary, but if not provided, we may not be able to process your request. We may disclose your information as follows: in relevant legal proceedings; to law enforcement when the U.S. Postal Service® (USPS®) or requesting agency becomes aware of a violation of law, to a congressional office at your request; to entities or individuals under contract with USPS; to entities authorized to perform audits; to labor organizations as required by law; to federal, state, local, or foreign government agencies regarding personnel matters; to the Equal Employment Opportunity Commission; and to the Merit Systems Protection Board or Office of Special Counsel. For more information regarding our privacy policies, visit [www.usps.com/privacypolicy](http://www.usps.com/privacypolicy).

Signature of Dispute Resolution Specialist	Date Issued	Your Signature	Date Received
Leah Gray	03/20/2015	ShaRhea L. Wise	04/01/2015

Dispute Resolution Specialist: If you are mailing this Notice, you must send it by Priority Mail®, Signature Confirmation™ Delivery.

STATEMENT OF RIGHTS - ON APPEAL  
RECONSIDERATION (M0617)

The Commission may, in its discretion, reconsider the decision in this case if the Complainant or the Agency submits a written request containing arguments or evidence which tend to establish that:

1. The appellate decision involved a clearly erroneous interpretation of material fact or law; or
2. The appellate decision will have a substantial impact on the policies, practices, or operations of the Agency.

Requests to reconsider, with supporting statement or brief, must be filed with the Office of Federal Operations (OFO) **within thirty (30) calendar days** of receipt of this decision. A party shall have **twenty (20) calendar days** of receipt of another party's timely request for reconsideration in which to submit a brief or statement in opposition. See 29 C.F.R. § 1614.405; Equal Employment Opportunity Management Directive for 29 C.F.R. Part 1614 (EEO MD-110), at Chap. 9 § VII.B (Aug. 5, 2015). All requests and arguments must be submitted to the Director, Office of Federal Operations, Equal Employment Opportunity Commission. Complainant's request may be submitted via regular mail to P.O. Box 77960, Washington, DC 20013, or by certified mail to 131 M Street, NE, Washington, DC 20507. In the absence of a legible postmark, the request to reconsider shall be deemed timely filed if it is received by mail within five days of the expiration of the applicable filing period. See 29 C.F.R. § 1614.604. The agency's request must be submitted in digital format via the EEOC's Federal Sector EEO Portal (FedSEP). See 29 C.F.R. § 1614.403(g). The request or opposition must also include proof of service on the other party.

Failure to file within the time period will result in dismissal of your request for reconsideration as untimely, unless extenuating circumstances prevented the timely filing of the request. Any supporting documentation must be submitted with your request for reconsideration. The Commission will consider requests for reconsideration filed after the deadline only in very limited circumstances. See 29 C.F.R. § 1614.604(c).

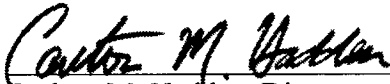
COMPLAINANT'S RIGHT TO FILE A CIVIL ACTION (S0610)

You have the right to file a civil action in an appropriate United States District Court **within ninety (90) calendar days** from the date that you receive this decision. If you file a civil action, you must name as the defendant in the complaint the person who is the official Agency head or department head, identifying that person by his or her full name and official title. Failure to do so may result in the dismissal of your case in court. "Agency" or "department" means the national organization, and not the local office, facility or department in which you work. If you file a request to reconsider and also file a civil action, **filing a civil action will terminate the administrative processing of your complaint.**

RIGHT TO REQUEST COUNSEL (Z0815)

If you want to file a civil action but cannot pay the fees, costs, or security to do so, you may request permission from the court to proceed with the civil action without paying these fees or costs. Similarly, if you cannot afford an attorney to represent you in the civil action, you may request the court to appoint an attorney for you. **You must submit the requests for waiver of court costs or appointment of an attorney directly to the court, not the Commission.** The court has the sole discretion to grant or deny these types of requests. Such requests do not alter the time limits for filing a civil action (please read the paragraph titled Complainant's Right to File a Civil Action for the specific time limits).

FOR THE COMMISSION:



\_\_\_\_\_  
Carlton M. Hadden, Director  
Office of Federal Operations

March 4, 2020

Date



JS 44 (Rev 09/19) District of Colorado

**CIVIL COVER SHEET**

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)

<p><b>I. (a) PLAINTIFFS</b></p> <p><b>(b)</b> <u>Dhahhea L. Wise</u> County of Residence of First Listed Plaintiff <u>El Paso</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p><b>(c)</b> Attorneys <i>(Firm Name, Address, and Telephone Number)</i> <u>Pro Se</u></p>	<p><b>DEFENDANTS</b></p> <p><u>Megan J. Brennan</u> County of Residence of First Listed Defendant <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</p> <p>Attorneys <i>(If Known)</i> <u>Unknown</u></p>
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<p><b>II. BASIS OF JURISDICTION</b> <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td>PTF</td> <td>DEF</td> <td></td> <td>PTF</td> <td>DEF</td> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		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
	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)* Click here for Nature of Suit Code Descriptions

<p><b>CONTRACT</b></p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment &amp; Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans <i>(Excludes Veterans)</i></p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p><b>TORTS</b></p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel &amp; Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury - Medical Malpractice</p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p><b>PERSONAL PROPERTY</b></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p><b>FORFEITURE/PENALTY</b></p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p><b>LABOR</b></p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Management Relations</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 751 Family and Medical Leave Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Employee Retirement Income Security Act</p> <p><b>IMMIGRATION</b></p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p><b>BANKRUPTCY</b></p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><b>PROPERTY RIGHTS</b></p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application</p> <p><input type="checkbox"/> 840 Trademark</p> <p><b>SOCIAL SECURITY</b></p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p><b>FEDERAL TAX SUITS</b></p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609</p>	<p><b>OTHER STATUTES</b></p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)</p> <p><input type="checkbox"/> 485 Telephone Consumer Protection Act</p> <p><input type="checkbox"/> 490 Cable/Sat/TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
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**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 - Transfer     8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION** *(Cite the U.S. Civil Statute under which you are filing. Do not cite jurisdictional statutes unless diversity)*

Title VII, PDA, ADA, Rehabilitation Act

Brief description of cause: Employment Discrimination  AP Docket

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ Maximum allowed by law CHECK YES only if demanded in complaint JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY** *(See instructions)* JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE 5-29-2020 SIGNATURE OF ATTORNEY OF RECORD Dhahhea Wise

FOR OFFICE USE ONLY: RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG JUDGE \_\_\_\_\_