

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
U.S. DISTRICT COURT
DISTRICT OF COLORADO

2023 NOV 21 PM 2:53

JEFFREY P. COLWELL
CLERK

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

BY _____ DEP. CLK

Lori Chacon
_____, Plaintiff

v.

Jury Trial requested:
(please check one)
☒ Yes ☐ No

Community College of Denver, _____,

Colorado Community College Systems, _____,

_____,

_____, 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.

5366 Laredo St., Denver, Colorado 80239

(Name and complete mailing address)

720-298-0068 orange4lori@yahoo.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: Community College of Denver, PO Box 173363 PO Box 201 Denver CO 80217
(Name and complete mailing address)

303-556-2600

(Telephone number and e-mail address if known)

Defendant 2: Colorado Community College Systems, 9101 E Lowry Blvd, Denver, CO 80230
(Name and complete mailing address)

303-620-4000

(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)

 X 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)

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

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

 Other: (please specify) _____

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: _____

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)* Constructive Discharge

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:

I worked for The Community College of Denver (CCD) for 11 years. My supervisor Patty Davis was the Executive Director of Human Resources (HR). I had observed and noted evidence of discrimination from my supervisor regarding the employees as well as myself several times throughout my employment at CCD. I told my supervisor if she didn't change, I would report her actions to the new President of the College which I had previously reported to the old President, who did nothing to address the issues. To keep me appeased, she said she would upgrade my position. I worked this position for 6 months and then when it came time to apply for my position, which should have been a simple process, only open to CCD employees, my supervisor then opened the position to everyone. The position was then given to a white male who was not even close to having the experience or qualifications I had. I was devastated and when I told my supervisor how this could happen, she then said, "You can't threaten me and then expect to be rewarded!" She also made a reference to my disability which she felt could hinder me in the new position. I quit and filed a grievance with the President's office. I received a letter from the CCD President Marielena DeSanctis after their investigation of my grievance and she said that the issue I presented was resolved and my supervisor Patty Davis was no longer working at CCD.

Some examples of discrimination/retaliation by Patty Davies:

1. I was on a committee to hire an HR specialist. There were 4 candidates, a Hispanic man, Hispanic woman, a black woman and a white woman. The white woman had the least HR experience, and the committee recommended the other candidates to move forward. Patty Davies overrode our recommendation and hired the white woman.
2. A Hispanic man applied for a job that he was qualified for but was the only candidate in the pool. Patty Davies said that we needed to get more applicants in the pool and then she hired a white woman for the position. But when a white woman applied for a position and was the only applicant in the pool, Patty Davies did not say we needed more applicants in the pool and when asked by me and another HR employee, Patty said that she can make that choice. We said that was discrimination and she did not care.
3. Patty Davies would not promote any of the other 2 Hispanic HR employees but promoted all the white HR employees. I was the only Hispanic promoted to higher positions but only after I threatened Patty Davies that I would go to the President of CCD and tell them about the discrimination I have witnessed. Patty Davies would not promote me to any position higher than generalist, but when the assistant director position became available twice, Patty Davies direct appointed white HR employees who were under me and did not have the qualifications for that position, but I did. When I addressed my concerns to Patty Davies about this issue, she said that it might be better for me because my disability might cause issues in this position.
4. When me and another Hispanic HR employee expressed our concerns regarding the better treatment and hiring of only white HR employees to Patty Davies, Patty said “don’t worry, I have hired a colored woman for the HR assistant director”. This was only after the 2 white candidates she wanted for this position declined the position due to other offers.
5. Patty Davies said she would promote me after I had told her I was going to leave due to the discrimination and bad treatment of myself and other minority HR employees. I was doing tasks that were beyond the scope of the position I was in already. The position was HR Technical Manager, and I was already performing the duties of this job for about 6-8 months. Patty Davies said that I would have to apply for the position, which was going to be open to CDD employees only. After I applied for the position, Patty said that she was going to open the position to everyone. I asked why when other HR positions that certain white HR employees were applying for were not open to everyone. She said not to worry because I was already doing the job and it was mine. I did not get the position; Patty Davies gave the job to a white male who did not have the qualifications that did. When I asked Patty Davies why this happened, Patty Davies told me “You can’t threaten me and then expect to be rewarded”.

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*)

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

 No

F. REQUEST FOR RELIEF

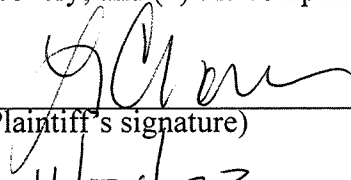
State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

I planned to work at CCD until I retired but due to the negative actions of my supervisor I felt I had no other choice but to leave. I am requesting relief in the amount of \$980,000. This would be close to 12 years of my salary that I feel was taken from me.

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)



(Date)

(Revised February 2022)

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.)

I. (a) PLAINTIFFS

DEFENDANTS

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

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

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
Pro Se

Attorneys (If Known)
Mary Nero

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)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input checked="" 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.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <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 - 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):
VI 42 U.S.C 2000e and 28 U.S.C 1367(a)

Brief description of cause:
Discrimination of Race, Disability & Retaliation

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
\$980,000

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

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

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

Telephone number

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION		Charge Presented To: Agency(ies) Charge No(s):	
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		<input type="checkbox"/> FEPA	541-2022-01381
		<input checked="" type="checkbox"/> EEOC	
Colorado Civil Rights Division and EEOC			
State or local Agency, if any			
Name (indicate Mr., Ms., Mrs.)		Home Phone (Incl. Area Code)	Date of Birth
Ms. Lori Chacon			1968
Street Address		City, State and ZIP Code	
5366 Laredo St Denver, CO 80239			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name		No. Employees, Members	Phone No. (Include Area Code)
Community College Of Denver		501+	(303) 556-2600
Street Address		City, State and ZIP Code	
1201 5Th St Denver, CO 80204			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es))		DATE(S) DISCRIMINATION TOOK PLACE	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN		Earliest Latest	
<input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION		01-01-2014 08-31-2021	
<input type="checkbox"/> OTHER (Specify)		<input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
<p>I began working for the organization named above in 2010, my most recent job title was Senior Human Resources Generalist. I successfully performed my duties throughout my tenure, and was directly supervised by the Director of Human Resources at all relevant times. I have a disability, as defined within the meaning of the relevant statute.</p> <p>Throughout much of tenure my supervisor subjected Hispanic employees to less favorable terms/conditions of employment including, but not limited to, promotional opportunities. Other Hispanic employees, and I, have made formal complaints to the organization about my supervisor's discrimination beginning as far back as 2014.</p> <p>Many times during my tenure I witnessed her engage in such discriminatory behavior as: she would either not announce an open position or make aware such an opening to only select (white) personnel, she would hire less qualified white employees instead of better qualified Hispanic applicants, insist an open position be re-advertised to gather more applicants when there was only one (1) Hispanic applicants, but she did not apply that same standard to other hiring decisions.</p> <p>[continued on next page]</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
		SIGNATURE OF COMPLAINANT	
		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE	
		(month, day, year)	
Date		Charging Party Signature	

EEOC Form 5 (11/09)

<p style="text-align: center; font-weight: bold; font-size: 1.2em;">CHARGE OF DISCRIMINATION</p> <p style="font-size: 0.8em;">This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;"> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right; font-weight: bold; font-size: 1.1em;">541-2022-01381</div> </div>
<p>Colorado Civil Rights Division and EEOC</p> <p style="font-size: 0.8em;">State or local Agency, if any</p>	
<p>THE PARTICULARS ARE <i>(If additional paper is needed, attach extra sheet(s))</i>:</p> <div style="padding: 10px;"> <p>[continued from previous page]</p> <p>On or about August 12, 2021, I was told that I was denied a promotion for a job I had performed on an interim basis for eight (8) months already. The successful applicant submitted a three-sentence-long application and listed no relevant supervisory experience as required for the position.</p> <p>Due to the ongoing discrimination I submitted my resignation on or about August 16, 2021, providing notice and stating my desired last day of work would be August 31, 2021. However, in a change of business practice my computer access was turned off the next day. The organization would normally only do that if an employee was terminated.</p> <p>I complained of discrimination to the Chief Human Resources Officer, Chief Financial Officer, and the President, however, they took no substantive actions to stop the discrimination and it continued.</p> <p>I believe that a class of Hispanic employees, including me, have been discriminated against due to our national origin and in retaliation for engaging in protected activities in violation of Title VII of the Civil Rights Act of 1964, as amended. Further, that I believe I have been discriminated against due to a disability in violation of the Americans with Disabilities Act of 1990, as amended.</p> </div>	
<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p> <p>I declare under penalty of perjury that the above is true and correct.</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; text-align: center;"> <hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> <p style="font-size: 0.8em;">Date</p> </div> <div style="width: 45%; text-align: center;"> <hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> <p style="font-size: 0.8em;">Charging Party Signature</p> </div> </div>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p> <div style="padding: 10px;"> <p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE <i>(month, day, year)</i></p> </div>

EEOC Form 7 (12/99)

CHARGE OF DISCRIMINATION

This form is afforded by the Privacy Act of 1974. See restricted Privacy Act

Statement and other information before completing this form

Charge Presented To

Agency(ies) Charge No(s)

EEOC

541-2022-01381

Not Applicable

and EEOC

State or local Agency, if any

a less qualified applicant, who was outside my protected class, and told me that it would look good for her demographics. Due to the ongoing discrimination I submitted my resignation on or about August 16, 2021, providing notice and stating my desired last day of work would be August 31, 2021. However, in a change of business practice my computer access was turned off the next day. The organization would normally only do that if an employee was terminated. I complained of discrimination to the Chief Human Resources Officer, Chief Financial Officer, and the President, however, they took no substantive actions to stop the discrimination and it continued. I believe that a class of Hispanic employees, including me, have been discriminated against due to our national origin and in retaliation for engaging in protected activities in violation of Title VII of the Civil Rights Act of 1964, as amended. Further, that I believe I have been discriminated against due to a disability in violation of the Americans with Disabilities Act of 1990, as amended.

J. Chasen

6/6/22

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Date

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month day, year)

EEOC Form 161 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Lori Chacon**
5366 Laredo St
Denver, CO 80239

From: **Denver Field Office**
950 – 17th Street
Suite 300
Denver, CO 80202

☐

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

EEOC Charge No.

EEOC Representative

Telephone No.

541-2022-01381

Philip Gross,
Enforcement Manager

(720) 779-3637

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☒

The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☐

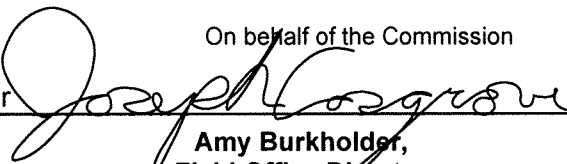
Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

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 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 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.**

On behalf of the Commission
For 
Amy Burkholder,
Field Office Director

August 31, 2023

Enclosures(s)

(Date Mailed)

cc: **COMMUNITY COLLEGE OF DENVER**