

Stephen Montoya (#011791)
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3200 North Central Avenue, Suite 2550
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stephen@montoyalawgroup.com

Attorney for Plaintiff

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

Agnes Milbourn,
Plaintiff,
v.
City of Phoenix,
Defendant.

No.

COMPLAINT

(Jury Trial Demanded)

For her Complaint against Defendant, Plaintiff alleges the following:

1. This is an action seeking to redress gender discrimination and retaliation in the public workplace brought by Ms. Agnes Milbourn against her employer, the City of Phoenix, under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e (as amended).
2. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331, 1343(4), and 42 U.S.C. § 2000e.
3. Venue is proper in this District under 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(f)(3).
4. Ms. Milbourn is a citizen of the United States of America residing in Maricopa County, Arizona.
5. Ms. Milbourn is female in gender.
6. Defendant City of Phoenix (the “City”) is an Arizona municipal corporation which owns and operates the Police Department of the City of Phoenix.

- 1 7. The City has been engaged in an industry affecting commerce and has had at
2 least fifteen employees for each working day in at least twenty calendar weeks
3 this year or last year at all times material to this Complaint.
- 4 8. Ms. Milbourn has been employed as a Police Officer by the City of Phoenix
5 Police Department at all times material to this Complaint.
- 6 9. Officer Milbourn's work performance at the Department has been satisfactory to
7 excellent at all times material to this Complaint.
- 8 10. During the course of her employment with the City, Officer Milbourn was
9 subjected to different terms and conditions of employment and retaliation by her
10 direct supervisor at the Phoenix Police Department based on Officer Milbourn's
11 status as a woman.
- 12 11. Specifically, Sgt. Giogi Chiappo served as Officer Milbourn's direct supervisor
13 at the Police Department from approximately March 2011 to approximately
14 January 2013.
- 15 12. Although Sgt. Chiappo is a woman, she has publically and privately stated in the
16 workplace that she is "harder on women officers" in the Phoenix Police
17 Department and that women officers "have to prove that they should be in the
18 Department."
- 19 13. In accordance with Sgt. Chiappo's stated intent to discriminate against women
20 officers in the Department, Sgt. Chiappo subjected Officer Milbourn to greater
21 supervision, harsher criticism, different job duties, and less favorable working
22 conditions than Officer Milbourn's male counterparts on Sgt. Chiappo's squad.
- 23 14. Officer Milbourn specifically complained of Sgt. Chiappo's discriminatory
24 conduct to Sgt. Chiappo's direct supervisor in the Police Department and to the
25 City of Phoenix's Equal Opportunity Department.
- 26 15. After Officer Milbourn complained of Sgt. Chiappo's discriminatory conduct,
27 Sgt. Chiappo commenced a pattern of retaliation against Officer Milbourn based
28 on her complaints.

1 16. For example,

- 2 • Sgt. Chiappo ordered Officer Milbourn to leave a
- 3 squad briefing when male officers who engaged in
- 4 the same or more serious conduct in the briefing were
- 5 not asked to leave;
- 6 • Sgt. Chiappo issued Officer Milbourn a Notice of
- 7 Investigation for allegations of insubordination based
- 8 on the briefing incident, although male officers
- 9 engaged in the same or more serious misconduct at
- 10 the briefing without consequence;
- 11 • Officer Milbourn was ultimately reprimanded in
- 12 writing as a result of Sgt. Chiappo's Notice of
- 13 Investigation against her;
- 14 • Sgt. Chiappo also denied Officer Milbourn weapons
- 15 related training;
- 16 • Sgt. Chiappo also issued Officer Milbourn
- 17 unjustified, poor performance reviews;
- 18 • Sgt. Chiappo also increased and intensified her
- 19 supervision, surveillance and unjustified criticism of
- 20 Officer Milbourn.

21 17. After investigating Officer Milbourn's complaints against Sgt. Chiappo, the City
22 of Phoenix ultimately concluded that Sgt. Chiappo had "retaliatorily animus"
23 against Officer Milbourn and "there is evidence to corroborate Officer
24 Milbourn's allegation of retaliation for participating in protected EEO activity."
25 See attached Exhibit A.

26 18. Sgt. Chiappo has also engaged in a pattern of discriminating against other
27 women police officers in the Phoenix Police Department, often without any
28 disciplinary response by the Department.

19. Defendant has tolerated a discriminatory work environment at the City of Phoenix for many years now, has routinely failed to investigate complaints of discriminatory harassment in the workplace, and has failed to adequately discipline employees guilty of engaging in discriminatory harassment.

20. Defendant's conduct as described above was intentional, protracted, malicious, and deliberately indifferent to and in reckless disregard of Officer Milbourn's federally protected rights under Title VII.

21. Defendant's discriminatory treatment of Officer Milbourn undermined her otherwise excellent job performance and has caused her to suffer lost wages and other income.

22. Defendant's discriminatory treatment of Officer Milbourn also had a detrimental impact on her well-being and her physical and emotional health.

23. Based upon Defendant's discriminatory conduct as summarized above, Officer Milbourn filed a Charge of Discrimination against the City of Phoenix with the United States Equal Employment Opportunity Commission ("EEOC") on December 4, 2012. See attached Exhibit B.

24. After Officer Milbourn filed her Charge of Discrimination with the EEOC, she continued to be subjected to gender discrimination and retaliation at work in the manner already summarized above.

25. After the EEOC investigated Officer Milbourn's Charges of Discrimination, it determined that Defendant had subjected her to unlawful retaliation against her after she complained about it, concluding that:

I have considered all the evidence obtained during the investigation and find that there is reasonable cause to believe Respondent violated Title VII of the Civil Rights Act of 1964 when it retaliated against Charging Party for engaging in a protected activity by subjecting her to disciplinary action, denying her training and giving her poor job performance reviews.

See attached Exhibit C.

26. Officer Milbourn has satisfied all of the requirements for initiating this action by

1 exhausting her administrative remedies with the EEOC and by filing this
2 Complaint within ninety days of her receipt of a Right to Sue letter from the
3 EEOC. See attached Exhibit D.

4 27. Pursuant to Rule 38 (b) of Federal Rules of Civil Procedure, Officer Milbourn
5 hereby demands a trial by jury.

6 **WHEREFORE**, Officer Milbourn respectfully requests the Court to:

- 7 A. Issue a judgment declaring that the conduct of Defendant as
8 described above violated Plaintiff's rights under Title VII of the
9 Civil Rights Act of 1964, 42 U.S.C. § 2000e, as amended;
10 B. Issue preliminary and permanent injunctions against Defendant
11 enjoining them from committing similar unlawful acts in the future;
12 C. Issue a judgment awarding Plaintiff nominal and compensatory
13 damages against Defendant in amounts to be determined by the
14 finder-of-fact at trial;
15 D. Issue a judgment awarding Plaintiff reasonable costs and attorney
16 fees against Defendant pursuant to 42 U.S.C. § 2000e and any other
17 applicable law; and
18 E. Issue a judgment awarding Plaintiff all other relief that is just and
19 proper against Defendant under the circumstances.

20 Respectfully submitted this 25th day of January 2016.

21
22 **MONTOYA, JIMENEZ & PASTOR, P.A.**

23 s/ Stephen Montoya
24 Stephen Montoya
25 3200 North Central Avenue, Suite 2550
26 Phoenix, Arizona 85012
27 Attorney for Plaintiff
28

1 I hereby certify that on January 25, 2016, I electronically transmitted the foregoing
2 document to the Clerk of Court using the CM/ECF System for filing and transmittal of
3 a Notice of Electronic Filing.

4 s/ Stephen Montoya
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EXHIBIT A



City of Phoenix

EQUAL OPPORTUNITY DEPARTMENT

Phoenix 2009



IN THE MATTER OF

Officer Agnes Milbourn

COMPLAINANT

and

Sergeant Giogi Chiappo
Phoenix Police Department

RESPONDENTS

CAUSE DETERMINATION

EOD # 12-21N and 13-06N

On February 6, 2012, an intake interview was conducted with Officer Agnes Milbourn. During that interview, Officer Milbourn alleged that she has been subjected to unfair treatment and harassing behavior from her direct supervisor, Sergeant Giogi Chiappo. Officer Milbourn attributed the discrimination to her sex. Officer Milbourn reported that she made a complaint about Sergeant Chiappo's conduct to Lieutenant Stan Hoover. After making that complaint to Lieutenant Hoover, Officer Milbourn alleges that Sergeant Chiappo retaliated against her.

On July 25, 2012, a second intake interview was conducted with Officer Milbourn. She reported that she is under investigation for violating a direct order given by Sergeant Chiappo. Officer Milbourn reported that male officers have exhibited similar conduct, but they were not investigated or disciplined. She alleged the investigation was retaliatory, because she filed a complaint with the Equal Opportunity Department (EOD) on February 6, 2012.

All of the incidents reported were timely and were investigated in accordance with Administrative Regulation (A.R.) 2.35.

There are three issues found within Officer Milbourn's allegations: discriminatory terms and conditions of employment, protected category harassment, and retaliation for engaging in protected activity.

Discriminatory terms and conditions of employment

A.R. 2.35, Section IV states that "No employee of the City is permitted to discriminate against another employee based on race, color, religion, gender, age, disability, sexual orientation, genetic information, or national origin." Officer Milbourn alleges that she was subjected to discriminatory terms and condition of employment due to her sex.

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The following elements of proof are required to make a prima facie case of discrimination in the terms and conditions of employment:

1. The Complainant belongs to a protected category.
2. The Complainant was denied equal terms and conditions of employment.
3. Others similarly situated, but not of Complainant's class were extended the terms or condition denied the Complainant.
4. The Respondents are unable to explain the difference in treatment or the Respondents' explanation is in fact pretext for discrimination.

Officer Milbourn alleged that she was subjected to discriminatory terms and conditions of employment because of her gender. She based this belief on the statement made by Sergeant Chiappo in briefing. Sergeant Chiappo made a statement that she has to be harder on female officers. Witnesses corroborated the discriminatory statement. Sergeant Chiappo denied making the remark as alleged, but reported making a similar remark with the intent of inspiring the female officers. The employees did not feel inspired, but rather felt that Sergeant Chiappo was telling them she was going to treat the female employees differently.

There is some evidence to support Officer Milbourn's claim that she was treated differently than other employees, but no evidence that the reason for any different treatment was based on her gender. The evidence shows that some male officers were also subjected to similar treatment and that other female officers were not treated like Officer Milbourn. It appears that Sergeant Chiappo had a lower tolerance for the actions of Officer Milbourn, but a higher tolerance for some of the other officers, male and female alike.

Most of the employees were concerned about being unsafe under Sergeant Chiappo's guidance. EOD did not make a determination as to Sergeant Chiappo's ability to do her job effectively, but on whether there was evidence to suggest the basis for Officer Milbourn's treatment was her protected status. There was not enough evidence to suggest that gender was the cause of any of the unfair treatment endured by Officer Milbourn. Either male or female officers reported the same treatment or no male or female officer reported being treated like Officer Milbourn.

Protected category harassment

According to A.R. 2.35 (B), Section III, "Protected category harassment' or 'harassment' is behavior based upon an individual's gender, race, color, sexual orientation, religion, age, disability, national origin, genetic information or any other legally protected basis, that is not welcome, that is offensive, demoralizing, and/or interferes with work effectiveness."

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3. The Respondent acted to deny a right of a privilege or to harm the Complainant.
4. There was a causal connection between the Complainant's protected activity and the Respondent's action(s).
5. The Respondent cannot provide a nondiscriminatory reason for the action against the Complainant.

Officer Milbourn cites the briefing incident referenced in Allegation #3 as evidence of retaliatory conduct. Following her refusal to leave briefing, Officer Milbourn was investigated and was issued a Notice of Investigation as a result of that briefing incident. Officer Milbourn's chain of command sustained the allegation of insubordination following Sergeant Chiappo's investigation.

EOD recognizes and respects the chain of command holding Officer Milbourn accountable for an allegation of insubordination. It is not EOD's role to second-guess a supervisor's attempt to correct behaviors and address issues with employees, provided it is done in an equitable fashion. As to the substance of an alleged Operations Orders violation, EOD will defer to any future inquiries to PSB.

However, EOD's role within the organization is to ensure fairness. Several witnesses reported that a male officer displayed similar or more insubordinate behavior to Sergeant Chiappo during the same briefing. That male officer did not receive a NOI and was not investigated for his actions in the briefing. Other witnesses reported a different incident involving two male officers and the perceived threat of physical violence. While one officer was asked to leave, neither received NOIs or were investigated.

The chain of command made a poor decision when it allowed Sergeant Chiappo to conduct an investigation into the briefing incident. Assigning the investigation to a third party would have ensured an unbiased investigation and would have protected both Officer Milbourn and Sergeant Chiappo.

Additionally, Sergeant Chiappo's investigation created a chilling effect among Officer Milbourn's squad members. In the course of her investigation, Sergeant Chiappo questioned several officers about the incident and subjected them to extraneous questions, including asking about Sergeant Chiappo's intent behind the issuance of a direct order during briefing. Several witnesses reported that they were uncomfortable with the questioning and may have given responses to appease Sergeant Chiappo. These same witnesses were aware not only of the Officer Milbourn's protected complaints against Sergeant Chiappo, but stated that the treatment that Officer Milbourn experienced was a factor in how they answered Sergeant Chiappo's questions. Additionally, two squad members expressed interest in raising their own protected complaints, but ultimately declined, citing the retaliatory conduct Officer Milbourn was experiencing.

Due to the reasons above, the issuance of the NOI and subsequent sustained allegation were retaliation. Normally, EOD would not comment on the fairness of issuing an NOI. An NOI is an important fact-finding tool for supervisors. However, it was improper to serve Officer Milbourn an NOI and disregard similar conduct from a male officer. This difference in treatment gave creditability to Officer Milbourn's case of gender discrimination and casts a shadow upon the chain of command that enabled Sergeant Chiappo to continue her differential treatment of Officer Milbourn.

The responsibility for retaliating against Officer Milbourn lies with Commander Gardner, Lieutenant Hoover, and Sergeant Chiappo. All three individuals were aware of the ongoing issues between Officer Milbourn and

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Sergeant Chiappo. While there was initially some effort made by Lieutenant Hoover to ensure that Officer Milbourn was treated fairly by Sergeant Chiappo, he clearly lost perspective regarding his role when he authorized Sergeant Chiappo's investigation and then recommended discipline as a result.

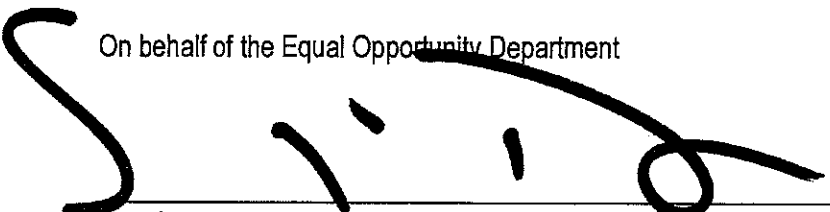
Additionally, Commander Gardner and Lieutenant Hoover approved Sergeant Chiappo's investigation into her own allegation of insubordination. This is a poor practice that resulted in a chilling effect on other employees.

Sergeant Chiappo's assertion that she viewed the male officer's conduct differently does not match the documented incident. It is clear the male employees were as or more insubordinate than Officer Milbourn. Although Officer Milbourn's conduct constituted an actual violation, the fact she was treated worse than another employee who engaged in similar disruptive conduct displays a retaliatory animus by Sergeant Chiappo. Sergeant Chiappo's memo about the incident clearly shows a bias against Officer Milbourn who at the time of the incident was the only employee who had engaged in protected activity.

There is evidence to corroborate Officer Milbourn's allegation of retaliation for participating in protected EEO activity. There has been a violation of A.R. 2.35, Section IX.

Based upon the information received, there is a violation of A.R. 2.35. This determination concludes the processing of this complaint. EOD's determination and Final Investigative Report will be referred to the Professional Standards Bureau for any additional follow up under PPD Operations Order 3.14. Any form of retaliation against a Complainant for filing a complaint of discrimination in employment is a violation of A.R. 2.35 and may be a violation of state and federal law.

On behalf of the Equal Opportunity Department


Lionel D. Lyons, Director

 11-5-13
Date

EXHIBIT B

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> 540-2013-00625 </div> </div>	
Arizona Attorney General's Office, Civil Rights Division and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Ms. Agnes Milbourn		Home Phone (Incl. Area Code) Date of Birth 	
Street Address City, State and ZIP Code 			
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 PHOENIX CITY OF POLICE DEPARTMENT		No. Employees, Members 500 or More	
Street Address 2075 East Maryland Avenue, Phoenix, AZ 85016		Phone No. (Include Area Code) (602) 495-5007	
Street Address City, State and ZIP Code 			
Street Address City, State and ZIP Code 			
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> RACE</div> <div style="width: 50%;"><input type="checkbox"/> COLOR</div> <div style="width: 50%;"><input type="checkbox"/> SEX</div> <div style="width: 50%;"><input type="checkbox"/> RELIGION</div> <div style="width: 50%;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="width: 50%;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="width: 50%;"><input type="checkbox"/> AGE</div> <div style="width: 50%;"><input type="checkbox"/> DISABILITY</div> <div style="width: 50%;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="width: 50%;"><input type="checkbox"/> OTHER (Specify)</div> </div>			DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest <div style="text-align: right;">08-20-2012</div> <div style="margin-top: 10px;"><input checked="" type="checkbox"/> CONTINUING ACTION</div>
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): Personal Harm: On or about February 6, 2012, I filed a gender-based Phoenix EEO complaint against my direct report in charge of 71B, Sergeant Giogi Chiappo. Since filing that complaint, Chiappo has retaliated against me with, but not limited to, the following: 1. I was issued a Notice of Investigation by Chiappo for allegations of misconduct. I deny the accusations. 2. I have been denied job-related training. Specifically, I have submitted on-going requests to Chiappo for Rifle Training. I was given no definitive response, equating to a denial of the training. 3. I have been issued poor monthly performance reviews not experienced prior to my gender discrimination complaints against Chiappo. This has also adversely affected my end-of-year performance evaluation. In or about October 2012, I further complained to Commander Gardner of Chiappo's retaliatory actions. To date, however, I have received no response. I believe I have been retaliated against with disciplinary action, denied training and poor job performance reviews for my prior complaints of unlawful discriminatory treatment, in violation of Title VII of the Civil Rights Act of 1964.			
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 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)	
I declare under penalty of perjury that the above is true and correct.		SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
Date Dec 04, 2012		Charging Party Signature A. Milbourn	

2012 DEC -4 PM 4:25

 RECEIVED
 EEOC
 DISTRICT OFFICE

EXHIBIT C



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Phoenix District Office

3300 N. Central Avenue, Suite 690
Phoenix, AZ 85012-2504
(602) 640-5000
TTY (602) 640-5072
FAX (602) 640-5071

Charge No. 540-2013-00625

Agnes Milbourn

Charging Party

City of Phoenix Police Department
2075 East Maryland Avenue
Phoenix, AZ 85016

Respondent

DETERMINATION

I issue the following determination on the merits of this charge.

Respondent is an employer within the meaning of Title VII of the Civil Rights Act of 1964. Timeliness and all other requirements for coverage have been met.

Charging Party alleged that her supervisor retaliated against her for filing a gender based EEO complaint by issuing her a Notice of Investigation, denying her job-related training and issuing her poor job performance reviews. Charging Party alleged that she complained about her supervisor's retaliatory actions to her Commander and received no response.

I have considered all the evidence obtained during the investigation and find that there is reasonable cause to believe Respondent violated Title VII of the Civil Rights Act of 1964 when it retaliated against Charging Party for engaging in a protected activity by subjecting her to disciplinary action, denying her training and giving her poor job performance reviews.

This determination is final. When the Commission finds that violations have occurred, it attempts to eliminate the alleged unlawful practices by informal methods of conciliation. Therefore, I invite the parties to join with the Commission in reaching a just resolution of this matter. Disclosure of information obtained by the Commission during the conciliation process will be made only in accordance with the confidentiality provisions of Title VII of the Civil Rights Act of 1964 and Commission Regulations.

This determination does not conclude the processing of this charge. The Commission will begin conciliation efforts to resolve all matters where there is reason to believe that violations have

Determination
Charge no.: 540-2014-01225

occurred. A Commission representative will contact each party in the near future to begin conciliation.

On behalf of the Commission:

APR 29 2015
Date

Barbara Schumacher
Rayford O. Irvin
District Director *for*

EXHIBIT D



U.S. Department of Justice
Civil Rights Division

VG:KDW:KLF
DJ 170-8-0

Employment Litigation Section - PHB
950 Pennsylvania Avenue, NW
Washington, DC 20530
www.usdoj.gov/crt/emp

OCT 23 2015

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

CERTIFIED MAIL 7010 0290 0000 2016 7476
RETURN RECEIPT REQUESTED

Ms. Agnes Milbourn
c/o Stephen Montoya, Esquire
Law Offices of Montoya, Jimenez & Pastor
3200 N. Central Avenue, Suite 2550
Phoenix, AZ 85012

Re. Agnes Milbourn v. City of Phoenix, Police Dept.
EEOC Charge No. 540-2013-00625

Dear Ms. Milbourn:

It has been determined that the Department of Justice will not file suit on the above-referenced charge of discrimination that was referred to us by the Equal Employment Opportunity Commission (EEOC). This should not be taken to mean that the Department of Justice has made a judgment as to whether or not your charge is meritorious.

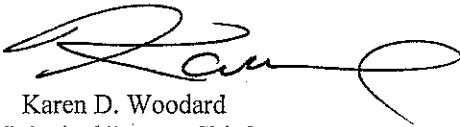
You are hereby notified that conciliation in this matter was unsuccessful by the EEOC. You are further notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e et seq., against the above-named respondent. If you choose to commence a civil action, such suit must be filed in the appropriate court within 90 days of your receipt of this Notice.

We are returning the files in this matter to EEOC's Phoenix District Office. If you or your attorney have any questions concerning this matter or wish to inspect the investigative file, please feel free to address your inquiry to: Rayford O. Irvin, District Director, EEOC, 3300 N. Central Ave., Ste. 690, Phoenix, AZ 85012

Sincerely,

Vanita Gupta
Principal Deputy Assistant Attorney General
Civil Rights Division

By:


Karen D. Woodard
Principal Deputy Chief
Employment Litigation Section

cc: Agnes Milbourn
City of Phoenix, Police Dept.
EEOC, Phoenix District Office

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff
(s): **Agnes Milbourn**

County of Residence: Maricopa

County Where Claim For Relief Arose: Maricopa

Defendant
(s): **City of Phoenix**

County of Residence: Maricopa

Plaintiff's Atty(s):

**Stephen Montoya (Agnes Milbourn)
Montoya, Jimenez & Pastor, P.A.
3200 North Central Avenue, Suite 2550
Phoenix, Arizona 85012
(602) 256-6718**

Defendant's Atty(s):

II. Basis of Jurisdiction: **3. Federal Question (U.S. not a party)**

III. Citizenship of Principal
Parties (Diversity Cases Only)

Plaintiff:- N/A

Defendant:- N/A

IV. Origin : **1. Original Proceeding**

V. Nature of Suit: **442 Employment**

VI.Cause of Action: **Title VII of the Civil Rights Act of 1964, 42 U.S.C Sec. 2000e (as amended).**

VII. Requested in Complaint

Class Action: **No**

Dollar Demand:

Jury Demand: **Yes**

VIII. This case is not related to another case.

Signature: s/ Stephen Montoya

Date: January 25, 2016

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, save this form as a PDF and include it as an attachment to your case opening documents.

Revised: 01/2014