IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Civil Division





V

HON. BRUCE R. JAMES

U.S. Government Printing Office In his official capacity 732 North Capitol Street, NW Washington, DC 20401

Defendant.

Civil Case No.

Jury Demand

CASE NUMBER

JUDGE: Colleen Kollar-Kotelly

DECK TYPE: Employment Discrimination

DATE STAMP:



COMPLAINT

UNLAWFUL DISCRIMINATION

1. Plaintiff through her counsels and the complaint against Defendant to enforce her rights under the Civil Rights Act of 1964, 42 U.S.C. § § 2000e, et seq. and Civil Rights Act of 1991.

JURISDICTION

- Jurisdiction of this Court is based upon the Civil Rights Act of 1964, 42 U.S.C. § §
 2000e, et seq. and Civil Rights Act of 1991.
- Venue lies in District of Columbia as the discriminatory acts complained of occurred within said jurisdiction.

FACTUAL BASIS OF THE COMPLAINT

- 4. Plaintiff is an African American citizen of the United States who resides at the address set forth in the caption above at all times material to the complaint.
- 5. Plaintiff is a member of a protected class (African American), color (black) and sex (female).
- 6. Plaintiff is an employee of the U.S. Government Printing Office.
- 7. Plaintiff applied for and was qualified for a Printing Services Specialists position.
- 8. Plaintiff was not selected for the position.
- 9. Plaintiff was treated differently than similarly situated individuals not in the plaintiff's protected class.
- 10. Plaintiff exhausted all of her administrative remedies because defendant accepted plaintiff's claims for investigation and over 180 days has passed since the formal investigation began.

STATEMENT OF CLAIM

Count I: Discrimination based on race (African American), color (black), and sex (female)

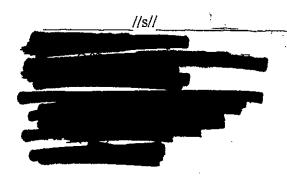
- 11. Plaintiff repleads and realleges paragraphs 1 through 10 above with the same force and effect as if set forth separately and at length herein.
- 12. Plaintiff was discriminated against because of race (African American), color (black) and sex (female) and when she was not selected for the position of Printing Services Specialist, PG-1654-07/09, as advertised under Vacancy Announcement Number 05-190.
- 13. Plaintiff, seeks the following relief:
- 14. Compensatory damages for pain and suffering, humiliation and discrimination in the amount of \$300,000 dollars.

- 15. Back pay and front pay.
- 16. Pre and Post-judgment interest.
- 17. The cost of litigation, including reasonable attorney's fees and expert witness' fees.
- 18. Such other relief as may be just.

JURY DEMAND

Plaintiff demands a trial by jury.

Respectfully submitted,



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