

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAVID IGASAKI)	
Plaintiff,)	
)	
v.)	
)	Case No.
)	Honorable Judge
)	Room
ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATIONS and LAURA FORESTER, an individual and as Chief of Medical Prosecution at the IDFPR)	
)	
Defendants.)	

**COMPLAINT FOR AGE DISCRIMINATION, RACE DISCRIMINATION, DISABILITY
DISCRIMINATION AND RETALIATORY DISCHARGE**

Plaintiff DAVID IGASAKI (“Plaintiff”) brings forth the following cause of action and allegations against the ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATIONS (“IDFPR”) and LAURA FORESTER (“Forester”), (herein collectively referred to as “Defendants”), and states the following:

INTRODUCTION

1. This action is brought by Plaintiff to secure redress for Defendant’s violation of his civil right to be free from employment discrimination on the basis of his race, sex, disability and age.

2. Plaintiff was a staff attorney for the medical prosecutions unit (“Unit”) at the IDFPR. Plaintiff was the only homosexual Asian staff attorney in the Unit and all his supervisors were Caucasian. Further, Plaintiff suffers from Gout and is over the age of forty (40) years old.

3. After working for Defendant for approximately twenty (20) years with a long history of good performance reviews, Plaintiff was suddenly unlawfully suspended and subsequently terminated based on his race, sex, disability and age.

JURISDICTION AND VENUE

4. This court has jurisdiction over Defendants pursuant to 28 U.S.C. § 1331 and 1337 on that this case arises under federal law, specifically, Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq* (“Title VII”); Title I of the Americans with Disability Act, 42 U.S.C. § 12101 *et seq* (“ADA”); the Age Discrimination of Employment Act, 29 U.S.C. § 623(a) (“ADEA”); and retaliatory discharge in violation of Title VII. Venue is proper in the Northern District of Illinois, Eastern Division since the unlawful practices occurred within this District pursuant to 28 U.S.C. § 1391(b) and (c). There is supplemental jurisdiction over the state law claims.

PARTIES

5. Plaintiff is a 62 year-old Japanese American citizen of the United States, residing in the city of Chicago, Illinois, Cook County. Plaintiff worked as an Advanced Program Specialist or Staff Attorney for the Defendants’ Medical Prosecutions Unit (“Unit”). Plaintiff’s job was to try disciplinary hearings and defend against petitions to restore professional licenses in front of the IDFPR’s administrative tribunals. Further, to conduct Informal Conferences and to draft and negotiate Consent Orders and other settlement agreements. Finally, to draft Complaints against professional licensees where appropriate.

6. The IDFPR is a government agency that regulates Illinois professionals for the benefit of Illinois consumers. The Unit conducts investigations and prosecutes medical doctors for violating Illinois law.

7. At all times relevant, the IDFPR continuously had in excess of twenty (20) employees working in the Northern District of Illinois.

8. At all times relevant, Forester is a Caucasian American citizen of the United states, resident of Illinois, and was employed as, Chief of Medical Prosecutions at the IDFPR, where some or all of the events in question transpired. At all times relevant, Forester was an attorney practicing law at the IDFPR.

STATEMENT OF FACTS

9. Plaintiff is a Japanese American citizen of the United States and thus belongs to a protected class of workers under Title VII.

10. Plaintiff consistently scored satisfactory or excellent reviews throughout his twenty (20) year career with the IDFPR. Plaintiff had never once been disciplined.

11. In 2011, Forester became Plaintiff's immediate supervisor when the IDFPR hired her as its new Chief of Medical Prosecutions.

12. On February 16, 2012, Forester gave Plaintiff a good annual 2011 review ("2011 Review"), indicating that Plaintiff "exceeded expectations" or "met expectations".

13. In the year following the February 2011 Review, Forester found out that Plaintiff was a homosexual and shortly thereafter Forester began to harass Plaintiff.

14. On or about January 31, 2013, Forester gave an extremely bad 2012 performance review to Plaintiff ("2012 Review").

15. The 2012 Review included alleged 2011 incidents which were never mentioned in her 2012 Review.

16. Furthermore, the 2012 Review was vague and never specified the cases that Forester claims that Plaintiff performed poorly on.

17. Forester admonished and publically shamed Plaintiff for this alleged poor performance, but to Plaintiff's knowledge Forester never actually submitted the 2012 Review to the Springfield, Illinois offices as required under department protocol.

18. Additionally, Forester created impossible deadlines for Plaintiff alone.

19. Forester constantly humiliated Plaintiff by undermining his authority to direct investigations assigned to him.

20. Furthermore, Plaintiff was the most senior staff attorney working in the Unit and to Plaintiff's knowledge had one of the largest caseloads in the Unit.

21. Despite his seniority and case load, Defendants provided him with the smallest and least accommodating work station. In this regard, even law students were assigned substantially larger work stations than Plaintiff.

22. On or about February 19, 2013, Defendants imposed a six (6) month Corrective Action Plan ("CAP") solely on Plaintiff.

23. From about April 27, 2013, Forester singled out Plaintiff and began to subject him to increasingly longer and more probing case reviews. The reviews increased from forty five (45) minutes in length to four and a half (4 ½) hours in length.

24. On or about August 13, 2013, Defendants extended the CAP for another six (6) months due to Forester's false claims that Plaintiff failed to comply with the CAP.

25. Sometime shortly after Plaintiff complained to IDFPR about the extended CAP, Forester imposed even more work and impossible deadlines on Plaintiff.

26. On or about December 12, 2013, Forester gave Plaintiff another poor evaluation ("December 2013 Evaluation"). Plaintiff responded in opposition to the poor evaluation, but Defendants never replied.

27. Sometime shortly thereafter, Plaintiff immediately filed a complaint with his union steward.

28. In early 2014, Forester manufactured a policy in which employees could not work past normal business hours (“No Work Late Policy”) and imposed the No Work Late Policy solely on the Plaintiff. Foster publically reprimanded Plaintiff for violating the No Work Late Policy and ordered Plaintiff alone to leave the office on multiple occasions.

29. Other similarly situated employees regularly violated the No Work Late Policy without reprimand.

30. Around this time the entire floor that Plaintiff worked on became infested with bedbugs. As a result, the bedbugs eventually were transmitted into Plaintiff’s home.

31. Upon information and belief, other similarly situated employees may have also faced similar bedbug issues.

32. Despite Plaintiff curing the bedbug issue on March 3, 2014 via a licensed exterminator, Defendants barred only Plaintiff from the work place (“Involuntary Leave”) for the bedbug issue from March 19, 2014 through August 25, 2014.

33. Defendants forced Plaintiff to use five (5) months of his voluntary leave days for the Involuntary Leave.

34. Further, Defendants ordered Plaintiff to obtain a second, third, and fourth extermination service for bed bugs that no longer existed before allowing him to return to work.

35. For the third extermination, Defendants forced Plaintiff to allow the use of dogs to inspect Plaintiff’s home for bed bugs. The exterminator and the dogs were present in Plaintiff’s home for over four (4) hours.

36. Although, the third exterminator reported Plaintiff was in compliance, the Defendant never-the-less rejected the report and did not allow Plaintiff to return to work.

37. On or about August 15, 2014, Plaintiff ordered a fourth exterminator report. The report again indicated Plaintiff was in compliance.

38. On or about August 19, 2014, Defendants indicated Plaintiff was finally clear to return to work, but did not allow him to start until August 25, 2014.

39. On or about October 8, 2014, Forester ordered Plaintiff to report a two hour lunch period even though Plaintiff had only taken a one hour lunch. Plaintiff refused to falsify his timecard to reflect a two hour lunch. In response, Forester refused to approve Plaintiff's timecard and directed Plaintiff to alter his timecard at least three times thereafter.

40. On or about September 11, 2014, Plaintiff filed a claim with the Illinois Department of Human Rights ("IDHR") and requested a cross claim with the Equal Employment Opportunity Commission ("EEOC").

41. Shortly thereafter, Plaintiff's work environment became even more hostile as Defendants increased Plaintiff's caseload with impossible deadlines and continued to prohibit him to work late.

42. On or about December 11, 2014, Plaintiff received a poor evaluation ("December 2014 Evaluation") from Defendants.

43. The December 2014 Evaluation included information that Forester admitted was irrelevant and also included dates for wrongdoings which occurred when Plaintiff was on leave.

44. On or about January 27, 2015, Defendants extended the CAP again, which included false accusations.

45. On or about January 27, 2015, Plaintiff submitted a request for reasonable accommodation based on his Gout diagnosis.

46. On or about January 29, 2015, Plaintiff submitted a response to the false accusation listed in the January 26, 2015 CAP.

47. On January 29, 2015 Plaintiff received his right to sue letter. This action is filed within 90-days of Plaintiff receipt of the Right to Sue Letter.

48. On or about February 6, 2015, Defendants partially denied Plaintiff's request for reasonable accommodations.

49. On or about February 13, 2015, Plaintiff responded to the Defendants partial denial of his request for reasonable accommodations.

50. On or about March 26, 2015, Defendants terminated Plaintiff's employment.

**COUNT I RACE DISCRIMINATION IN VIOLATION OF
TITLE VII OF THE CIVIL RIGHTS ACT OF 1964,
AS AMENDED 42 U.S.C § 2000(e) et seq.**

51. Plaintiff hereby incorporates and re-alleges the allegations of paragraphs 1 through 47 as if the allegations are set forth herein.

52. Plaintiff is a Japanese American citizen of the United States and is thus a member of a protected class based on race.

53. Plaintiff suffered adverse employment action when Forester wrongfully accused Plaintiff of poor job performance, Defendants imposed a CAP on Plaintiff, forced Plaintiff to take Voluntary Leave pay for the Involuntary Leave imposed on him, and Defendants terminated Plaintiff's employment.

54. Defendant treated other similarly situated Caucasian employees more favorably by providing them with larger work stations, reasonable deadlines, and did not undermine the authority given to them.

55. Further in addition to imposing impossible deadlines on the Plaintiff, Forester also enforced the No Work Late Policy only on the Plaintiff alone. As a proximate result of Defendants actions, Plaintiff has suffered severe economic losses, including loss of employment, damage to his professional reputation, future pay, overtime pay, vacation days, and benefits.

WHEREFORE, Plaintiff prays this Court enters judgment against Defendants and in favor of Plaintiff in an amount of no less than \$100,000 to be determined at trial, award Plaintiff attorney's fees and all costs incurred in pursuing this matter, and any other relief this Honorable Court deems appropriate.

COUNT II SEX DISCRIMINATION IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED 42 U.S.C § 2000(e) et seq.

56. Plaintiff hereby incorporates and re-alleges the allegations of paragraphs 1 through 47 as if the allegations are set forth herein.

57. Plaintiff is a male citizen of the United States and is thus a member of a protected class based on his sex. Shortly after Forester learned Plaintiff was a homosexual, Plaintiff began to suffer a hostile work environment and adverse employment action when Forester wrongfully accused Plaintiff of poor job performance, Defendants imposed a CAP on Plaintiff, forced Plaintiff to take Voluntary Leave pay for the Involuntary Leave imposed on him, and Defendants terminated Plaintiff's employment.

58. No other similarly situated male employees suffered such hostile work environment and adverse employment action.

59. Defendants unlawfully discriminated against Plaintiff when it terminated him based on his sex.

60. As a proximate result of Defendants actions, Plaintiff has suffered severe economic losses, including loss of employment, damage to his professional reputation, future pay, overtime pay, vacation days, and benefits.

WHEREFORE, Plaintiff prays this Court enters judgment against Defendants and in favor of Plaintiff in an amount of no less than \$100,000 to be determined at trial, award Plaintiff attorney's fees and all costs incurred in pursuing this matter, and any other relief this Honorable Court deems appropriate.

**COUNT III AGE DISCRIMINATION IN VIOLATION OF
THE AGE DISCRIMINATION IN EMPLOYMENT ACT, 29 U.S.C. § 623(a)**

61. Plaintiff hereby incorporates and re-alleges the allegations of paragraphs 1 through 47 as if the allegations are set forth herein.

62. At 62 years old, Plaintiff is covered by ADEA's protected class of workers over 40. Plaintiff was the oldest employee in the Unit at the time of discharge. The remaining employees were all in their early 30's to mid-40's.

63. Plaintiff is well qualified for his position as a Staff Attorney in the Unit.

64. Plaintiff suffered a hostile work environment and adverse employment action when Forester wrongfully accused Plaintiff of poor job performance, Defendants imposed a CAP on Plaintiff, forced Plaintiff to take Voluntary Leave pay for the Involuntary Leave imposed on him, and Defendants terminated Plaintiff's employment

65. Upon information and belief, Defendant has replaced Plaintiff with an employee who is in their early thirties.

66. Defendants unlawfully discriminated against Plaintiff when it created a hostile work environment against the Plaintiff and terminated him based on his age.

67. As a proximate result of Defendants actions, Plaintiff has suffered severe economic losses, including loss of employment, damage to his professional reputation, future pay, overtime pay, vacation days, and benefits.

WHEREFORE, Plaintiff prays this Court enters judgment against Defendants and in favor of Plaintiff in an amount of no less than \$50,000 to be determined at trial, award Plaintiff attorney's fees and all costs incurred in pursuing this matter, and any other relief this Honorable Court deems appropriate.

**COUNT V. RETALIATION IN VIOLATION OF TITLE VII
OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED,
42 USC § 2000e-3(a). WHISTLEBLOWER PROVISIONS**

68. Plaintiffs hereby incorporate and re-allege the allegations of paragraphs 1 through 47 as if the allegations are set forth herein.

69. On or about September 11, 2014 Plaintiff engaged in a statutorily-protected expression by filing a complaint to the IDHR and the EEOC concerning discrimination covered under Illinois Statute and Title VII as referenced above.

70. Shortly thereafter, Plaintiff's work environment worsened dramatically. Forester sharply increased Plaintiff's workload, made Plaintiff's deadlines even more impossible, and ordered Plaintiff to complete tasks outside his job description.

71. Furthermore, Forester's December 11, 2014 evaluation of Plaintiff included false accusations and events which occurred when Plaintiff was on leave.

72. On or about January 23, 2015, due to an unknown problem at the IDHR, which shares the same building as the IDFPR, Plaintiff had to refile his claim with the EEOC.

73. On or about January 26, 2015, Defendant renewed Plaintiff's wrongfully imposed CAP and included false and unfair accusations.

74. Moreover, Forester imposed even more impossible deadlines and humiliated Plaintiff by publically forcing only him to leave the office under the No Work Late Policy when other staff attorneys were allowed to stay.

75. Plaintiff suffered further adverse employment action when Defendants eventually terminated his employment on March 26, 2015.

76. At the time of his termination, Defendants were fully aware that Plaintiff filed a claim to the EEOC complaining of discrimination protected under Title VII.

77. As a direct result, Defendants terminated Plaintiff for the sole purpose of retaliating against him for reporting Defendants to the EEOC.

78. Defendants actions constitute unlawful retaliation in violation of the Title VII.

79. Defendants actions were willful within the meaning of Title VII justifying the imposition of liquidated damages.

80. As a proximate result of Defendants actions, Plaintiff has suffered severe economic losses, including loss of employment, damage to his professional reputation, future pay, overtime pay, vacation days, and benefits.

WHEREFORE, Plaintiff prays this Court enters judgment against Defendants and in favor of Plaintiff in an amount of no less than \$100,000 to be determined at trial, award Plaintiff attorney's fees and all costs incurred in pursuing this matter, and any other relief this Honorable Court deems appropriate.

COUNT IV DISABILITY DISCRIMINATION
IN VIOLATION OF TITLE I OF THE ADA,
42 U.S.C. § 12101 et seq

81. Plaintiffs hereby incorporate and re-allege the allegations of paragraphs 1 through 47 as if the allegations are set forth herein.

82. Plaintiff has a disability as he was diagnosed with Gout in the hand and wrist which is a permanent and substantially limiting impairment.

83. Plaintiff is able to perform the essential functions of the job with reasonable accommodations.

84. Plaintiff made a request for reasonable accommodations to the Defendant, thus Defendant was aware of Plaintiff's disability.

85. Defendant partially denied Plaintiff's request and thus failed to make a reasonable accommodation to Plaintiff's known disability.

WHEREFORE, Plaintiff prays this Court enters judgment against Defendants and in favor of Plaintiff in an amount of no less than \$100,000 to be determined at trial, award Plaintiff attorney's fees and all costs incurred in pursuing this matter, and any other relief this Honorable Court deems appropriate.

COUNT V
(745 ILCS 10/0-102)
RESPONDEAT SUPERIOR

86. Plaintiffs hereby incorporate and re-allege the allegations of paragraphs 1 through 85 as if the allegations are set forth herein.

87. In committing the acts alleged, each individual defendant was acting within his/her scope of employment with the IDFPR.

88. In Illinois, public entities are directed to pay for tort judgment for compensatory damages for which employees are liable within the scope of their employment. 745 ILCS 10/9-102.

89. As a proximate cause of Defendants unlawful acts Plaintiffs suffered damages enumerated above.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully request that, after trial by jury, this court grant her relief as follows:

A. Award Plaintiff compensatory damages equal to the additional pay, additional overtime pay, vacation days, and benefits he would have been entitled but for Defendants race discrimination, sex discrimination, age discrimination and retaliatory actions;

C. Award Plaintiff front pay damages equal to the lost future wages and benefits that he will be deprived of as a result of the Defendants retaliatory actions;

D. Award Plaintiff liquidated damages in an amount equal to two times Plaintiff compensatory or economic loss damages;

E. Reinstate Plaintiff in his former position as staff attorney at the IDFPR.

F. Awarding Plaintiff all reasonable costs and attorney's fees incurred herein, including reasonable attorneys' fees as authorized by 42 U.S.C. § 1988;

G. Award pre-judgment and post-judgment interest as provided by law; and

H. Award such other relief as this Court deems just and appropriate.

SHAW LEGAL SERVICES LTD.,

By: /s/ Caryn I. Shaw
One of its Attorneys

SHAW LEGAL SERVICES, LTD

Caryn I. Shaw

540 W. Briar Ste B

Chicago, IL 60657

(773) 549-9500

(773) 549-9503

Attorney no: 6315737

JS 44 (Rev. 3/13)

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>I. (a) PLAINTIFFS</p> <p>DAVID IGASAKI</p> <p>(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number)</p> <p>SHAW LEGAL SERVICES, LTD., 540 W. BRIAR, STE B, CHICAGO, IL 60657</p>	<p>DEFENDANTS</p> <p>ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION and LAURA FORESTER, as an individual and in her capacity as Chief of Medical Prosecution at the IDFPR.</p> <p>County of Residence of First Listed Defendant COOK <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 (If Known)</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p>1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p>2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in one Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> </thead> <tbody> <tr> <td>Citizen of This State</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;">4</td> <td style="text-align: center;">4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;">2</td> <td style="text-align: center;">2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;">5</td> <td style="text-align: center;">5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;">3</td> <td style="text-align: center;">3</td> <td>Foreign Nation</td> <td style="text-align: center;">6</td> <td style="text-align: center;">6</td> </tr> </tbody> </table>		PTF	DEF		PTF	DEF	Citizen of This State	1	1	Incorporated or Principal Place of Business In This State	4	4	Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5	Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6
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IV. NATURE OF SUIT (Place an "X" in One Box Only)

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 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	<p>PERSONAL INJURY</p> <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	<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 <p>PERSONAL PROPERTY</p> <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	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p style="text-align: center;">PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <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 <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	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	SOCIAL SECURITY	
<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	<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	<input type="checkbox"/> 510 Motions to Vacate Sentence <p>Habeas Corpus:</p> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <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	<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	<input type="checkbox"/> 861 HIA (1395f) <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))	
			IMMIGRATION	FEDERAL TAX SUITS	
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

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

<p>VI. CAUSE OF ACTION (Enter U.S. Civil Statute under which you are filing and write a brief statement of cause.)</p> <p>Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, et seq, illegal employment discrimination.</p>	<p>VII. Previous Bankruptcy Matters (For nature of suit 422 and 423, enter the case number and judge for any associated bankruptcy matter previously adjudicated by a judge of this Court. Use a separate attachment if necessary.)</p>
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VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** 500,000.00 **CHECK YES only if demanded in complaint:** **JURY DEMAND:** Yes No

IX. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____

X. This case (check one box) Is not a refiling of a previously dismissed action is a refiling of case number _____ previously dismissed by Judge _____

DATE **4/27/15** SIGNATURE OF ATTORNEY OF RECORD