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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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	)	
	)	
	)	
Plaintiff(s),	)	Case Number: _____
	)	
v.	)	
	)	
	)	
	)	
Defendant(s).	)	

**COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.
  
2. The plaintiff is \_\_\_\_\_ of the  
county of \_\_\_\_\_ in the state of \_\_\_\_\_.
  
3. The defendant is \_\_\_\_\_, whose  
street address is \_\_\_\_\_,  
(city) \_\_\_\_\_ (county) \_\_\_\_\_ (state) \_\_\_\_\_ (ZIP) \_\_\_\_\_  
(Defendant's telephone number) (\_\_\_\_) – \_\_\_\_\_
  
4. The plaintiff sought employment or was employed by the defendant at (street address)  
\_\_\_\_\_  
(city) \_\_\_\_\_  
(county) \_\_\_\_\_ (state) \_\_\_\_\_ (ZIP code) \_\_\_\_\_

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5. The plaintiff [*check one box*]

- (a)  was denied employment by the defendant.
- (b)  was hired and is still employed by the defendant.
- (c)  was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month)\_\_\_\_\_, (day)\_\_\_\_\_, (year)\_\_\_\_\_.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

- (a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] has has not filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i)  the United States Equal Employment Opportunity Commission, on or about (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year)\_\_\_\_\_.
- (ii)  the Illinois Department of Human Rights, on or about (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year)\_\_\_\_\_.

- (b) If charges *were* filed with an agency indicated above, a copy of the charge is attached.  Yes,  No, **but plaintiff will file a copy of the charge within 14 days.**

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

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defendant asserting the acts of discrimination indicated in this court complaint.

Yes (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year) \_\_\_\_\_

No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)\_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

Yes  No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

Yes  NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a)  the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

(b)  the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year)\_\_\_\_\_ a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [***check only those that apply***]:

(a)  Age (Age Discrimination Employment Act).

(b)  Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

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- (c)  Disability (Americans with Disabilities Act or Rehabilitation Act)
  - (d)  National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
  - (e)  Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
  - (f)  Religion (Title VII of the Civil Rights Act of 1964)
  - (g)  Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C.§1331, 28 U.S.C.§1343(a)(3), and 42 U.S.C.§2000e-5(f)(3); for 42 U.S.C.§1981 and §1983 by 42 U.S.C.§1988; for the ADA by 42 U.S.C.§12117; for the Rehabilitation Act, 29 U.S.C. § 791; and for the ADEA, 29 U.S.C. § 626(c).
12. The defendant [*check only those that apply*]
- (a)  failed to hire the plaintiff.
  - (b)  terminated the plaintiff's employment.
  - (c)  failed to promote the plaintiff.
  - (d)  failed to reasonably accommodate the plaintiff's religion.
  - (e)  failed to reasonably accommodate the plaintiff's disabilities.
  - (f)  failed to stop harassment;
  - (g)  retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
  - (h)  other (specify): \_\_\_\_\_

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13. The facts supporting the plaintiff's claim of discrimination are as follows:

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14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury.  Yes  No

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff **[check only those that apply]**

- (a)  Direct the defendant to hire the plaintiff.
- (b)  Direct the defendant to re-employ the plaintiff.
- (c)  Direct the defendant to promote the plaintiff.
- (d)  Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e)  Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f)  Direct the defendant to (specify): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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- (g)  If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h)  Grant such other relief as the Court may find appropriate.

\_\_\_\_\_  
(Plaintiff's signature)

\_\_\_\_\_  
(Plaintiff's name)

\_\_\_\_\_  
(Plaintiff's street address)

(City) \_\_\_\_\_ (State) \_\_\_\_\_ (ZIP) \_\_\_\_\_

(Plaintiff's telephone number) (\_\_\_\_) – \_\_\_\_\_

Date: \_\_\_\_\_

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