

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ALBERT TOOMBS,

Plaintiff,

v.

**CHESTERFIELD COUNTY PUBLIC
SCHOOLS AND/OR SCHOOL BOARD,
PATRICK STEELE, AND SHAWN ABEL,**

Defendants.

**Civil Action No. 3:25cv207
TRIAL BY JURY DEMANDED**

COMPLAINT

Plaintiff Albert Toombs, by counsel, files this Complaint against Defendants, Chesterfield County Public Schools and/or School Board, Patrick Steele, and Shawn Abel. The Complaint arises from Defendants’ intentional decision to deny Plaintiff, based upon his race and age, an interview and employment for a high school baseball coach position for which Plaintiff was amply, fundamentally, and uniquely qualified. Plaintiff, thereby, claims here race and age discrimination, in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*, the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, pursuant to 42 U.S.C. § 1983, the Equal Rights Under the Law, 42 U.S.C. § 1981, and the Age Discrimination in Employment Act of 1967, 29 U.S.C. § 621, *et seq.* In support of this Complaint, Plaintiff alleges as follows:

PARTIES

1. Plaintiff Albert Toombs (“Mr. Toombs”) is an individual, natural person, and, at all times relevant, a citizen of the Commonwealth of Virginia residing in Chesterfield County.

2. Defendant Chesterfield County Public Schools and/or School Board (“CCPS”) is a person, a government entity, and a political subdivision of the Commonwealth of Virginia. CCPS operates Midlothian High School.

3. Defendant Patrick Steele (“Steele”) is an individual, natural person, and, at all times relevant, a CCPS employee at Midlothian High School acting in the course and scope of his employment.

4. Defendant Shawn Abel (“Abel”) is an individual, natural person, and, at all times relevant, a CCPS employee at Midlothian High School acting in the course and scope of his employment. At all times relevant, Abel was Steele’s supervisor.

JURISDICTION AND VENUE

5. This Court possesses original jurisdiction over the Complaint, pursuant to 28 U.S.C. §§ 1331 and 1343, because the Complaint presents federal and civil rights questions under Title VII of the Civil Rights Act of 1964, as codified under 42 U.S.C. § 2000e, *et seq.*, the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, pursuant to 42 U.S.C. § 1983, the Equal Rights Under the Law, 42 U.S.C. § 1981, and the Age Discrimination in Employment Act, 29 U.S.C. § 621, *et seq.*

6. This Court, namely the Richmond Division of the Eastern District of Virginia, is the proper venue for Mr. Toombs’s Complaint, pursuant to 28 U.S.C. § 1391, because Defendants are located in Chesterfield County, Virginia and the events and Mr. Toombs’s injuries below occurred and arose in that location.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

7. On December 16, 2023, Mr. Toombs filed a Charge of Discrimination with the United States Equal Employment Opportunity Commission (“EEOC”). Mr. Toombs’s Charge of

Discrimination alleged race and age discrimination, in violation of the appropriate and respective laws, *supra*.

8. On January 23, 2025, the EEOC issued and Mr. Toombs received a right-to-sue letter.

9. Accordingly, Mr. Toombs has exhausted the administrative requirements for this action. Thus, he now timely files this Complaint within ninety (90) days of the EEOC's right-to-sue letter.

STATEMENT OF FACTS

10. Mr. Toombs incorporates and re-asserts fully herein the allegations of paragraphs 1 through 9, *supra*.

11. Mr. Toombs is a 64-year-old African American. He is a native Virginian, who has been a resident of Chesterfield County, Virginia for decades. Mr. Toombs is intimately familiar with the area and, in particular, the local sports scene.

12. Indeed, Mr. Toombs was the first African-American child to play little league in Chase City, Virginia. Since then, he has dedicated his career to the game of baseball.

13. To state that Mr. Toombs possesses experience in baseball is an understatement. For lack of a better description, baseball is a part of his identity. Mr. Toombs's experience in baseball includes, but is not limited to:

(a) From 1977 to 1979, Mr. Toombs played varsity baseball for Bluestone High School, earning the position as team captain and ultimately most valuable player;

(b) From 1979 to 1983, Mr. Toombs played college baseball for Longwood University, during which time he served as team captain, led the nation in batting average, played in the Division II World Series, and was selected as an All-American player;

(c) From 2000 to 2006, Mr. Toombs served as head coach for Gordon Baseball, during which time he coached children ranging from ages 11 to 18 and led his team to be Senior Colt League Champions in 2002;

(d) In 2002, Mr. Toombs was inducted into West End High School Hall of Fame;

(e) From 2007 to 2008, Mr. Toombs served as assistant head coach of Monacan High School (which is a school that CCPS operates);

(f) From 2008 to 2011, Mr. Toombs served as assistant varsity baseball coach for Manchester High School (which is another school that CCPS operates), during which time his team won championships in 2009 and 2010;

(g) Simultaneous to CCPS employment, from 2007 to 2012, Mr. Toombs also served as the head and assistant baseball coach for the American Legion, winning various championships and tournaments;

(h) In 2012, Mr. Toombs served as head baseball coach for Manchester High School (again, a third school that CCPS operates);

(i) In 2016, Mr. Toombs was inducted to the Longwood University Hall of Fame; and

(j) From 2012 to the present date, Mr. Toombs continued to serve as head baseball coach with the American Legion, winning various awards for his service and tournaments.

14. In addition to his baseball experience above, Mr. Toombs in 2011 also started a private business, called, “The Hit Doctor, LLC.” He still operates this business. In this business, Mr. Toombs serves as a private baseball coach, offering his extensive experience and knowledge

to coach and assist student baseball players, including CCPS students, hone their skills. Mr. Toombs is well-known in Central Virginia and Chesterfield County, Virginia baseball scene.

15. In sum, Mr. Toombs has a decades-long career of accomplishment and success in baseball, including in coaching (including three times for CCPS itself), leading and supervising, and playing.

16. On or about June 26, 2023, CCPS posted a job advertisement that it was hiring a head baseball coach for Midlothian High School. In the post, CCPS described the position, essential functions, and necessary qualifications as follows:

General Description

Position is responsible for providing leadership, supervision, and coaching instruction at a large public high school. Responsibilities may include supervising teams at varsity and junior varsity levels.

Essential Functions

- Provide instruction in all phases of the game, sport, or activity;
- Work with student athletes to improve personal and teamwork skills;
- Provides guidance and encouragement to help students profit from their participation;
- Maintain compliance of Chesterfield County Public Schools and Virginia High School League rules, regulations, and policies that pertain to athletic programs;
- Promotes a favorable image of the school district. Encourages community partnerships that enhance district programs and services;
- Works with the athletic director to evaluate program needs;
- Promotes the proper use and care of school property;
- Communicate effectively with the team, staff, parents, administration, community and the media;
- Handle financial items for the athletic program, including the inventory and purchase of equipment and the collection of fees;
- Participate in athletic department fund-raisers;
- Complete all necessary forms, including VHSL required master eligibility forms;
- Organize and maintain proper records, including VHSL physical forms, insurance information and team statistics and information;
- Be knowledgeable of, monitor, and maintain compliance of applicable health and safety practices.

Qualifications

Ability to communicate effectively, both orally and in writing. Demonstrates professionalism and contributes to a positive environment. Working knowledge about athletic program regulations. Skillfully manages individual, group, and organizational interactions. Effectively uses verbal, nonverbal, writing, and listening skills. Averts problem situations and intervenes to resolve conflicts. Exercises self-control and perseverance when dealing with students. Completes paperwork timely and accurately. Maintains an acceptable attendance record and is punctual.

17. In light of his ample and unique experience, Mr. Toombs was qualified for this position and clearly able to perform the essential functions of the same.

18. Mr. Toombs immediately applied for this position, demonstrating his interest.

19. On his application, Mr. Toombs disclosed to CCPS that he is “Black or African-American” and included a copy of his resume, which reflected his experience above, including with CCPS. Mr. Toombs’s resume readily permitted CCPS to infer his age.

20. In short, CCPS was aware of Mr. Toombs’s race, age, and experience.

21. Shortly after submitting his application, Mr. Toombs personally contacted Defendant Steele and notified him that he had submitted the application.

22. Steele is Caucasian and substantially younger than Mr. Toombs. At the time, he was the Midlothian High School Director of Student Activities and one of two CCPS decision-makers for the hiring to the position. Upon information and belief, Steele was familiar with the local baseball scene and knew who Mr. Toombs was.

23. Defendant Abel, who was Midlothian High School’s Principal, is also Caucasian and substantially younger than Mr. Toombs. He was the second decision-maker.

24. Mr. Toombs received no response from Steele.

25. On July 11, 2023, Toombs personally contacted Steele a second time. This time, Mr. Steele responded, informing Mr. Toombs, “We will start going through applications this week and hope to interview the last week of July.”

26. Neither Steele nor Abel subsequently followed up with Mr. Toombs.

27. Instead, on August 7, 2023, Toombs learned that Steele and Abel had interviewed and offered the position to another candidate.

28. Mr. Toombs contacted Steele a third time, inquiring as to the reason he did not receive an interview.

29. Steele responded to Mr. Toombs, stating on behalf of himself, Abel, and CCPS, “While your resume was impressive, we chose to interview applicants with current or more current experience with high school programs. I can tell you it was an extremely competitive field of applicants. Good luck with the rest of your American Legion Season.” This statement was false.

30. In fact, rather than interview or hire Mr. Toombs, Steele and Abel interviewed and hired Darian Carpenter.

31. The distinctions between Mr. Toombs and Mr. Carpenter are immense. Mr. Carpenter is a 29-year-old Caucasian who had only recently graduated from Virginia Commonwealth University in 2017. He had no experience with high school programs or coaching high school baseball, including with CCPS. Additionally, Mr. Carpenter was substantially lesser-experienced and -qualified for the position.

32. What is more, Steele and Abel had exclusively interviewed substantially younger and lesser-qualified Caucasian applicants for the position.

33. Given these circumstances, no question exists that race and age played a decisive and motivating role in CCPS's outright rejection of Mr. Toombs as a suitable candidate for the high school baseball coaching position at Midlothian High School.

COUNT I
Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*
(Race Discrimination)
(Defendant Chesterfield County Public Schools and/or School Board)

34. Mr. Toombs incorporates and re-asserts fully herein the allegations of paragraphs 1 through 33, *supra*.

35. Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* ("Title VII") directs, "[i]t shall be an unlawful employment practice for an employer . . . to fail or refuse to hire . . . any individual . . . because of such individual's race" 42 U.S.C. § 2000e-2(a)(1) (alteration added).

36. CCPS is an employer under Title VII. At all times relevant, CCPS acted through its Caucasian decision-making employees, including Steele and Abel, who were acting in the course and scope of their employment for CCPS.

37. Mr. Toombs is African American and a member of a protected group.

38. Mr. Toombs applied for employment with CCPS, namely a high school baseball coaching position.

39. Mr. Toombs was amply, fundamentally, and uniquely qualified for this position.

40. Notwithstanding, CCPS categorically rejected Mr. Toombs for an interview and the position.

41. Instead, CCPS offered interviews to lesser-experienced and -qualified Caucasian applicants. And, subsequently, it hired a substantially lesser-experienced and -qualified Caucasian applicant. Unlike Mr. Toombs, this applicant possessed no current or recent high school program

or coaching experience, including with CCPS, whatsoever (of course, such experience was not even a qualification listed in the posting).

42. The totality of these circumstances permits a reasonable inference that CCPS failed and refused to offer Mr. Toombs an interview and the position because of his race.

43. Indeed, no legitimate, non-discriminatory, or plausible reason otherwise existed to reject Mr. Toombs for an interview and the position.

44. CCPS's actions have proximately caused Mr. Toombs to suffer compensatory and other damages.

45. Mr. Toombs has suffered compensatory and other damages in the form of, *inter alia*, lost income, embarrassment, emotional distress, humiliation, pain and suffering, reputational damage, and shame.

46. The above-described actions, in sum, constitute discrimination in violation of Title VII.

47. Mr. Toombs is entitled to all reasonable costs, including attorneys' fees, associated with this matter, plus interest, pursuant to 42 U.S.C. § 2000e-5(k).

COUNT II
Equal Protection Clause of the Fourteenth Amendment, 42 U.S.C. § 1983
(Race Discrimination)
(Individual Defendants Steele and Abel)

48. Mr. Toombs incorporates and re-asserts fully herein the allegations of paragraphs 1 through 47, *supra*.

49. The Equal Protection Clause of the Fourteenth Amendment commands, "[n]o State shall . . . deny to any person within its jurisdiction the equal protection of the laws." U.S. Const. amend. XIV, § 1.

50. In this context, Section 1983 permits a civil action against a person who, acting under the color of state law, causes the “deprivation of any rights, privileges, or immunities secured by the Constitution and laws” of the United States. 42 U.S.C. § 1983.

51. Mr. Toombs’s right to equal protection and to be free from race discrimination in the context of employment is clearly established.

52. Mr. Toombs is an African American and member of a protected class.

53. Mr. Toombs applied for employment with CCPS, namely for a high school baseball coaching position.

54. Mr. Toombs was amply, fundamentally, and uniquely qualified for this position.

55. At the time of Mr. Toombs’s application, Steele and Abel were acting in the course and scope of their employment with CCPS and the decision-makers for CCPS as to the position in question.

56. Steele and Abel, who are both Caucasian, were also acting individually under the color of state law as CCPS local government employees.

57. Mr. Toombs and numerous Caucasians had applied for the position with CCPS.

58. Steele and Abel were aware of Mr. Toombs’s race and, upon information and belief, knew personally of Mr. Toombs at the time of his application.

59. Steele and Abel met, discussed the applicants, including Mr. Toombs, and awarded interviews only to Caucasian applicants. These applicants were substantially-lesser experienced and qualified than Mr. Toombs for the position in question. Steele and Abel did not notify Mr. Toombs of this decision.

60. Only upon Mr. Toombs’s inquiry, Steele and Abel defended the decision not to offer Mr. Toombs an interview, falsely stating current or more current experience with high school

programs was required. This requirement was not even on the job posting. Nonetheless, Mr. Toombs had this experience, including years of the same for CCPS itself.

61. What is more, Steele and Abel offered the position to Mr. Carpenter, who is Caucasian and who had no experience whatsoever with high school programs and who had never taught at a high school, including at CCPS. He was also substantially-lesser experienced and -qualified for the position.

62. Accordingly, Steele and Abel treated Mr. Toombs less favorably than Caucasian applicants.

63. The totality of these circumstances permits a reasonable inference that Steele and Abel intentionally and/or purposefully failed and refused to interview or hire Mr. Toombs because of race.

64. Indeed, no legitimate, non-discriminatory, or plausible reason otherwise existed to do so.

65. Steele and Abel's actions were the proximate cause of (a) the deprivation of Mr. Toombs's right to the equal protection of the laws, pursuant to the Equal Protection Clause, and to be free from race discrimination in employment and (b) Mr. Toombs's damages herein.

66. Mr. Toombs has suffered compensatory and other damages in the form of lost income, embarrassment, emotional distress, humiliation, pain and suffering, reputational damage, and shame.

67. Mr. Toombs is also entitled to punitive damages. Steele and Abel's deliberate actions were in reckless and/or willful disregard of Mr. Toombs's right to equal protection of the laws, pursuant to the Equal Protection Clause, and to be free from discrimination in employment.

68. Mr. Toombs is entitled to all reasonable costs, including attorneys' fees, associated

with this matter, plus interest, pursuant to 42 U.S.C. § 1988.

COUNT III
Equal Protection of the Laws, 42 U.S.C. § 1981
(Race Discrimination)
(Individual Defendants Steele and Abel)

69. Mr. Toombs incorporates and re-asserts fully herein the allegations of paragraphs 1 through 68, *supra*.

70. Section 1981 commands:

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens

42 U.S.C. § 1981. This right is clearly established in the context of the prohibition against race discrimination in employment.

71. Mr. Toombs is African American and a member of a protected class and racial minority.

72. Mr. Toombs applied for employment with CCPS, namely for a high school baseball coaching position.

73. Mr. Toombs was amply, fundamentally, and uniquely qualified for this position.

74. At the time of Mr. Toombs's application, Steele and Abel, who are Caucasian, were acting in the course and scope of their employment and the decision-makers for CCPS as to the position in question.

75. Steele and Abel were acting individually under the color of state law as CCPS local government employees.

76. Mr. Toombs and numerous Caucasians had applied for the high school coaching position with CCPS.

77. Steele and Abel were aware of Mr. Toombs's race and, upon information and belief, knew personally of Mr. Toombs at the time of his application.

78. Steele and Abel met, discussed the applicants, including Mr. Toombs, and awarded interviews only to Caucasian applicants. These applicants were substantially lesser experienced and qualified than Mr. Toombs.

79. Steele and Abel failed and refused to offer Mr. Toombs an interview, falsely defending the decision on the basis of a lack of current or more current experience with high school programs. This requirement was not even identified in the job post. Notwithstanding, as a matter of fact, Mr. Toombs possessed such experience and had many years of high school baseball coaching experience, including with CCPS directly.

80. What is more, Steele and Abel then offered the position to Mr. Carpenter, who is Caucasian and who had no experience whatsoever with high school programs and who had never taught at a high school. He was also substantially lesser experienced and qualified for the position.

81. Accordingly, Steele and Abel treated Mr. Toombs less favorably than his Caucasian co-applicants in the context of the formation of an employment contract and/or relationship.

82. The totality of these circumstances permits a reasonable inference that Steele and Abel intentionally and/or purposefully discriminated against Mr. Toombs because of his race.

83. Indeed, no legitimate, non-discriminatory, or plausible reason otherwise existed to reject Mr. Toombs so categorically.

84. Steele and Abel's actions were the proximate cause of (a) the deprivation of Mr. Toombs's right to the equal protection of the laws and to be free from race discrimination in formation of an employment contract and/or relationship and (b) Mr. Toombs's damages herein.

85. Mr. Toombs has suffered compensatory and other damages in the form of lost

income, embarrassment, emotional distress, humiliation, pain and suffering, reputational damage, and shame.

86. Mr. Toombs is also entitled to punitive damages. Steele and Abel's actions were in reckless and/or willful disregard of his right to the equal protection of the laws and to be free from race discrimination in the formation of an employment contract and/or relationship.

87. Mr. Toombs is entitled to all reasonable costs, including attorneys' fees, associated with this matter, plus interest, pursuant to 42 U.S.C. § 1988.

COUNT IV
Age Discrimination in Employment Act of 1967, 29 U.S.C. § 621, *et seq.*
(Age Discrimination)
(Defendant CCPS)

88. Mr. Toombs incorporates and re-asserts fully herein the allegations of paragraphs 1 through 87, *supra*.

89. The Age Discrimination in Employment Act of 1967, 29 U.S.C. § 621, *et seq.* ("ADEA") mandates, "[i]t shall be unlawful for an employer . . . to fail or refuse to hire . . . any individual . . . because of such individual's age." 29 U.S.C. § 623(a)(1).

90. At all times relevant, Mr. Toombs was over the age of 40. More specifically, he was 63 years of age.

91. At 63 years of age, Mr. Toombs applied for employment with CCPS, namely to the position of high school baseball coach.

92. Mr. Toombs was amply, fundamentally, and uniquely qualified for this position.

93. Notwithstanding, CCPS, acting through its substantially younger decision-makers Steele and Abel, rejected Mr. Toombs not only for the position but also even a simple interview.

94. Instead, CCPS, acting through Steele and Abel, interviewed only Caucasian applicants, all of whom were substantially younger (all under 40 years of age) and lesser-

experienced and -qualified for the position.

95. CCPS, acting through Steele and Abel, also declined to interview Mr. Toombs, falsely stating the basis of its decision as his lack of *current or more current experience* with high school programs. This experience was not a requirement in the job posting. Nonetheless, as a matter of fact, Mr. Toombs possessed such experience, including directly with CCPS baseball. Tellingly, this false statement also reasonably reflects Steele and Abel's belief that Mr. Toombs's experience was too dated (i.e., he was too old).

96. Ultimately, CCPS, acting through Steele and Abel, interviewed and hired a 29-year-old Mr. Carpenter, who was substantially younger and lesser experienced and qualified. In fact, Mr. Carpenter possessed no experience with high school programs and coaching, including with CCPS.

97. The totality of these circumstances permits a reasonable inference that CCPS intentionally and/or purposefully discriminated against Mr. Toombs and him for an interview and the position because of his age.

98. Indeed, no legitimate, non-discriminatory, or plausible reason otherwise existed to do so.

99. CCPS's actions, though Steele and Abel, were the proximate cause of (a) the deprivation of Mr. Toombs's right to the equal protection of the laws and to be free from age discrimination in employment and (b) Mr. Toombs's damages herein.

100. Mr. Toombs has suffered damages in the form of lost employment and wages, including back and front pay, out-of-pocket costs and expenses, and, due to the willful nature of the violation, liquidated damages.

101. Mr. Toombs is entitled to all reasonable costs, including attorneys' fees, associated

with this matter, plus interest.

CONCLUSION

Mr. Toombs has spent his life battling discrimination on the playing field. His battle began when he was a child and watched the police threaten to arrest his father because he had fought for his son's right to play little league in Chase City, Virginia. Mr. Toombs and his family won that battle, and Mr. Toombs became the first African-American to play little league there – beginning a beautiful and rich career in baseball. Now, more than fifty years later, he must sadly fight the same battle at 64 years of age.

PRAYER FOR RELIEF

Accordingly, Plaintiff Albert Toombs requests the following relief against Defendants, as appropriate to their respective claims: (a) compensatory damages; (b) punitive damages; (c) back and front pay; (d) liquidated damages; (e) equitable and injunctive relief; (f) attorney's fees and costs; and (g) any such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff Albert Toombs demands a trial by jury on all issues so triable and reserves the right to amend this Complaint to add new claims and parties as discovery may warrant.

**Respectfully Submitted,
Albert Toombs**

_____/s/_____
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Counsel for Plaintiff

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

Albert Toombs

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

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

Nicholas Simopoulos, Esquire, Simopoulos Law, PLLC, 406 West Franklin Street, Richmond, Virginia 23220, (804) 220-5755

DEFENDANTS

Chesterfield County Public Schools and/or School Board, Patrick Steele, and Shawn Abel

County of Residence of First Listed Defendant Chesterfield County, VA
(IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

Unknown

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 | ☐ 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 |

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
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☒ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 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):
Title VII; 42 U.S.C. 1983, 1981, ADEA

Brief description of cause:

Age and race discrimination in the context of hiring for employment.

VII. REQUESTED IN COMPLAINT:

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

DEMAND \$
1,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

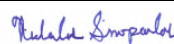
JUDGE

DOCKET NUMBER

DATE

03/17/2025

SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

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AMOUNT

APPLYING IFP

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