

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

\_\_\_\_\_  
\_\_\_\_\_  
(Name of Plaintiff or Plaintiffs)

v.

**Civ. Action No.** \_\_\_\_\_  
(To be assigned by Clerk's Office)

**COMPLAINT FOR  
EMPLOYMENT DISCRIMINATION**  
(Pro se)

\_\_\_\_\_  
\_\_\_\_\_  
(Name of Defendant or Defendants)

Jury Demand?  
 Yes  
 No

1. This action is brought pursuant to (check all spaces that apply):

- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, sex, or national origin.
- Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age. My year of birth is: \_\_\_\_\_.
- Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.
- Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

2. Plaintiff resides at \_\_\_\_\_  
(Street Address)

\_\_\_\_\_  
(City) (County) (State) (Zip Code)  
\_\_\_\_\_. **Attach additional sheets if more than one Plaintiff.**  
(Area Code) (Phone Number)

3. Defendant resides at, or its business is located at \_\_\_\_\_  
(Street Address)

\_\_\_\_\_.  
(City) (County) (State) (Zip Code)

**Attach additional sheets if more than one Defendant.**

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's \_\_\_\_\_ place of business  
(Defendant's Name)  
located at \_\_\_\_\_  
(Street Address)  
\_\_\_\_\_  
City) (County) (State) (Zip Code)

5. The alleged discriminatory acts occurred on \_\_\_\_\_,  
(Day) (Month) (Year)

6. The alleged discriminatory practice  is  is not continuing.

7. On \_\_\_\_\_,  
(Day) (Month) (Year), Plaintiff filed charges  
with the Department of Labor of the State of Delaware: \_\_\_\_\_,  
(Agency)  
\_\_\_\_\_  
(Street Address) (City) (County)  
\_\_\_\_\_, regarding defendant's alleged discriminatory conduct.  
(State) (Zip Code)

8. On \_\_\_\_\_,  
(Day) (Month) (Year), Plaintiff filed charges  
with the Equal Employment Opportunity Commission of the United States regarding defendant's alleged  
discriminatory conduct.

9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue  
letter which was received by plaintiff on: \_\_\_\_\_,  
(Day) (Month) (Year)

**(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)**

10. The alleged discriminatory acts, in this suit, concern:
- A.  Failure to employ plaintiff.
  - B.  Termination of plaintiff's employment. Plaintiff was terminated from employment on the following date: \_\_\_\_\_.
  - C.  Failure to promote plaintiff. Plaintiff was refused a promotion on the following date: \_\_\_\_\_.
  - D.  Other acts (please specify): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

11. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):

- A.  Plaintiff's race
- B.  Plaintiff's color
- C.  Plaintiff's sex
- D.  Plaintiff's religion
- E.  Plaintiff's national origin
- F.  Plaintiff's age
- G.  Plaintiff's disability

12. A copy of the charges filed with the Department of Labor of the State of Delaware and/or the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

**(NOTE: ATTACH A COPY OF THE CHARGES FILED WITH THE DEPARTMENT OF LABOR OF THE STATE OF DELAWARE AND/OR THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION OF THE UNITED STATES TO THIS COMPLAINT.)**

**THEREFORE**, Plaintiff asks the Court to grant such relief as may be appropriate, including but not limited to (check all that apply):

- A.  Injunctive relief (specify what you want the Court to order): \_\_\_\_\_
- B.  Back pay.
- C.  Reinstatement to former position.
- D.  Monetary damages in the amount of \_\_\_\_\_.
- E.  That the Court appoint legal counsel.
- F.  Such relief as may be appropriate, including costs and attorney's fees.
- G.  Other (specify): \_\_\_\_\_.

**I/We declare under penalty of perjury that the foregoing is true and correct.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
(Signature of Plaintiff)

\_\_\_\_\_  
(Signature of additional Plaintiff)

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.