

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

CAROLINA CUETO,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	NO. _____
	)	
TEACO ENERGY SERVICES, INC;	)	
ABC RENTAL TOOL CO., INC.; HARRY	)	
TEAGUE, President, TROY TEAGUE, Vice	)	
President; JAMES CHENAULT,	)	
JOHN DOES I-X and JANE DOES I-X; and	)	
BLACK CORPORATIONS I-X and WHITE	)	(JURY TRIAL DEMANDED)
CORPORATIONS I-X,	)	
	)	
Defendants.	)	
	)	
_____	)	

**COMPLAINT FOR CIVIL RIGHTS**

COMES NOW Plaintiff, Carolina Cueto, by and through her undersigned counsel and hereby presents the following Complaint against the Defendants and each of them as follows:

**I. STATEMENT OF CLAIM**

1. This is an action to vindicate violations of the Plaintiff's Civil Rights and readdress the unlawful and discriminatory conduct in employment practices of this defendant.
2. This jury action seeks redress for Defendants' violations of the laws of United States in connection with the sexual harassment of Plaintiff. The

action specifically seeks to enforce Rights created under Title VII, Civil Rights Act of 1964 (“Title VII”) (42 U.S.C. § 2000e, et seq.), prohibiting race and national origin discrimination, sex discrimination, racial and sexual harassment and retaliation in employment based upon sex. This action also seeks to enforce the Rights as set forth under the New Mexico Human Rights Act.

3. Plaintiff, Carolina Cueto seeks declaratory, injunctive and other equitable relief, and compensatory and punitive damages based on Defendants’ deprivation of Rights accorded to the Plaintiff under § 1981 of the Civil Rights Act of 1981, as amended by the Civil Rights Act of 1991, 42 U.S.C. § 1981.
4. Additionally, Plaintiff seeks declaratory, injunctive, and other equitable relief, and compensatory and punitive damages based on Defendants’ discrimination against her in violation of Title VII of the Civil Rights Act of 1964 as amended by the Civil Rights Act of 1991, 42 U.S.C. §§ 2000e, et seq. (“Title VII”).

## II. PARTIES

5. Plaintiff, Carolina Cueto is a citizen of the United States residing in Lovington, Lea County, New Mexico. At all times relevant, Plaintiff Cueto was an employee of the Defendant, as provided under Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. §§ 2000e, et seq., and applicable case law.

6. Defendant, ABC Rental Tool Co. Inc., hereinafter, (“ABC”) is a corporation organized and existing under the laws of the state of New Mexico, and whose principle executive offices are located at 320 N. Turner Street, Hobbs, New Mexico 88240.
7. Defendant, Teaco Energy Services Inc., hereinafter, (“TES”) is a corporation organized and existing under the laws of the state of New Mexico, and whose principle executive offices are located at 320 N. Turner Street, Hobbs, New Mexico 88240.
8. At all relevant times, the Defendants employed in excess of 15 employees and was an employer within the meaning of the Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. §§ 2000e, et seq.
9. Defendant Harry Teague (Harry) is, and at all times material hereto was, an individual working as an employee/owner operator (President) for Defendants ABC and TES. This action is brought against Harry, both individually and also in his official capacity.
10. Defendant Troy Teague (Troy) is, and at all times material hereto was, an individual working as an employee/owner operator (Vice President) for Defendants ABC and TES. This action is brought against Troy, both individually and also in his official capacity.
11. Defendant James Chenault (Defendant Chenault) is, and at all times material hereto was, an individual working as an employee and agent for Defendants ABC/TES as Chief Operations Manager. This action is

brought against Defendant Chenault, both individually and also in his official capacity.

12. Defendants JOHN DOES I-X and JANE DOES I-X, BLACK CORPORATIONS I-X, WHITE CORPORATIONS I-X are fictitiously identified Defendants, who, upon information and belief, committed wrongful acts in violation of Plaintiff's Constitutional Rights which caused or contributed to Plaintiff's injuries and damages. When the true identities of these Defendants become known, leave of this Court will be sought to amend this Complaint Accordingly. Upon information and belief, the Defendants JOHN DOE I-X and JANE DOE I-X, are and were at all times relevant herein employees, servants, actual agents or ostensible agents of Defendants (ABC/TES) acting within the scope of their employment or agency.
13. Although Plaintiff has sued the Defendants' designated as JOHN DOES and JANE DOES I-X, BLACK CORPORTATIONS I-X and WHITE CORPORTATIONS I-X, by fictitious names, Plaintiff will ask the Court to amend this Complaint to show true names, capacities and status as Defendants when the same have been ascertained or clarified. Plaintiff was informed and believes, and therefore alleges that each Defendant designated herein as DOE; BLACK CORPORTATIONS and WHITE CORPORATIONS is legally responsible in some manner for the events and happenings referred to herein and the damages as claimed herein.

14. All acts and omissions of individual Defendants were done within the scope of actual, apparent and/or sensible employment by and pursuant to actual, apparent and/or ostensible authority of other Defendants making the corporation(s) and/or partnership(s), and/or other entity (ies) which are Defendants here responsible under the doctrine of agency, ostensible agency and/or *respondent superior*, for the acts and omissions of the individual Defendants.

### **III. JURISDICTION AND VENUE**

15. This is an action authorized and instituted pursuant to Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. §§ 2000e, et seq., as amended by the Civil Rights Act of 1991. This Court has jurisdiction to grant relief pursuant to 28 U.S.C.A. § 1331, 28 U.S.C.A. § 1343(3), 28 U.S.C.A. §§ 1343(4), 29 U.S.C.A. 1001 et seq. This Court is vested with jurisdiction to order an injunction, back pay, front pay or any other equitable relief as may be proper, and compensatory and punitive damages, attorney fees and costs pursuant to 42 U.S.C.A. § 1981 (a), 42 U.S.C.A. § 1988 (b) and 42 U.S.C.A. § 2000e-5(g). This Court has jurisdiction over all state law claims pursuant to 42 U.S.C.A. 1331 and 42 U.S.C.A. § 1367.
16. Venue is proper pursuant to 42 U.S.C.A. § 2000e-5(f)(3), 28 U.S.C.A. § 1391(b) and 28 U.S.C.A. 1391(c) because the unlawful employment practices were committed within this judicial district.

17. Defendant corporations, ABC/TES are licensed to do business and doing business in Lea County, State of New Mexico. Defendant corporations are “employers” as defined by 42 U.S.C.A. § 2000e(b) because both companies are engaged in an industry affecting commerce and maintain 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year.

#### **IV. ADMINISTRATIVE PREREQUISITES**

18. The Plaintiff has complied with all the administrative prerequisites to action under § 706 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e-5 as follows:
  - A. Plaintiff timely filed formal charges of discrimination with the Equal Employment Opportunity Commission/Human Rights Division (hereinafter referred to as “E.E.O.C”);
  - B. On October 1, 2007, the EEOC issued Plaintiff Notice of Rights to Sue entitling Plaintiff to commence this action within ninety days of receipt of that notice. Plaintiff received the notice of Rights to Sue on October 3, 2007. A copy of the Notice of Rights to Sue is attached as Exhibit “A”.

#### **V. FACTUAL ALLEGATIONS**

19. On December 28, 2005, Plaintiff began working as a Secretary at the Eunice ABC Office for the Defendants, where she maintained her duties and responsibilities as a secretary.

20. Throughout her employment, Plaintiff performed her duties in an acceptable, professional and highly competent matter.
21. In an attempt to persuade Plaintiff to date him, Chief Operations Manager, Defendant Chenault showered Plaintiff with gifts, the use of vehicles, provided her with pay increases and job promotions.
22. On multiple occasions Defendant Chenault requested the presence of Plaintiff at his house for weekend dinners and when Plaintiff refused or did not show up, Defendant Chenault would retaliate against her by becoming angry refusing to talk or to communicate with her at work for several days thereafter.
23. As a single mother of two young children, Plaintiff felt compelled to attend Defendant Chenault's residence for weekend dinners in order to avoid the possibility of losing her job and/or to avoid the hostile environment that was created on the other times she refused to attend his residence.
24. During her employment with ABC, Inc., and during working hours and during other work related activities, Plaintiff was subjected to a hostile work environment by being repeatedly, intentionally, and maliciously harassed by certain male co-workers and by Defendant, James Chenault, her supervisor, whose harassing conduct included, but was not limited to: subjecting Plaintiff to sexual jokes, comments and inquiries, sexually oriented physical contact, sexual gestures and sexually oriented practical jokes.

25. Plaintiff was sexually harassed by her supervisor and co-workers because she is a woman. This continuous pattern of sexual harassment was hostile, offensive, and abusive both to the Plaintiff.
26. Plaintiff objected to the aforesaid conduct and complained of it to her supervisor, to the general manager of ABC, Inc., and the President and/or Vice President of TES, Inc.
27. By virtue of her complaints to the above-mentioned individuals, Defendants, ABC, Inc. and TES, Inc., had knowledge of the sexual harassment of the Plaintiff by her supervisor and co-workers.
28. Despite her complaints to the above-mentioned individuals, Defendant, ABC, Inc. and TES, Inc., refused to take corrective or remedial action.
29. Because of her supervisors, the general manager, the President and/or the Vice President of ABC/TES, Inc. refusal to take corrective or remedial action, Defendants, ABC, Inc. and TES, Inc., acquiesced in the sexual harassment of the Plaintiff by her supervisor and co-workers.
30. Such conduct created an offensive, intimidating and hostile work environment for Plaintiff, made daily work difficult for her, and ultimately forced her to resign her position at ABC/TES, Inc.
31. In view of the foregoing, Defendants, ABC, Inc. and TES, Inc. discriminated against the Plaintiff in regard to the terms, conditions, and privileges of her employment.
32. While employed by ABC, Inc., Plaintiff earned a base salary plus bonuses.

33. Because of the sexual harassment suffered by Plaintiff, she was forced to resign her position at ABC, Inc., and take other employment, which employment provided Plaintiff with a lower salary than Plaintiff earned with Defendant, ABC, Inc., and with no bonuses.
34. In view of the foregoing, Plaintiff has been damaged by the Defendants.
35. The Plaintiff was intentionally, repeatedly, and maliciously touched in a sexual manner by Defendant, James Chenault and other co-workers.
36. Such intentional physical contact by Defendant Chenault and other employees was done without the consent of the Plaintiff and was offensive to the Plaintiff and accordingly constituted a battery of the Plaintiff.
37. Plaintiff objected to such conduct and complained of it to her supervisor, to the general manager of ABC, Inc., and to both the President and Vice President of the corporations.
38. Because of the aforementioned complaints, Defendants, ABC, Inc. and TES, Inc. had knowledge of the battery Plaintiff was subjected to but refused to take corrective or remedial action.
39. Defendants, ABC, Inc. and TES, Inc. therefore acquiesced in the battery endured by the Plaintiff.
40. In view of the foregoing, Plaintiff has been damaged by Defendants.
41. Defendants intended, by harassing Plaintiff, to cause her to suffer severe mental and emotional distress.
42. Because of the Defendants' harassment of the Plaintiff, Plaintiff suffered severe mental and emotional distress.

43. Because of the aforementioned complaints Defendants, ABC, Inc. and TES, Inc., had knowledge of the acts causing Plaintiff mental and emotional distress, but refused to take corrective or remedial action.
44. Defendants, ABC, Inc. and TES, Inc. therefore acquiesced in the conduct of its subordinates causing Plaintiff severe mental and emotional distress.
45. In view of the foregoing, Plaintiff has been damaged by Defendants.

**COUNT I - VIOLATION OF NEW MEXICO HUMAN RIGHTS ACT**  
**SEXUAL HARASSMENT**

46. Plaintiff incorporates and realleges in full, paragraphs 1 to 45 as set forth above.
47. The actions of Defendants, by and through the conduct of their agents, employees, supervisors, officers and directors, were based on Plaintiff being female.
48. Plaintiff, by being subjected to the described sexual harassment and sexually hostile, offensive and anti-female work environment created by Defendants, was unreasonably affected in a “term, condition, or privilege” of employment pursuant to the New Mexico Human Rights Act, and her psychological well-being was seriously affected. Moreover, Defendants took a tangible, adverse employment action against Plaintiff, by and through the actions of their agents, when they demoted her from the position of office manager because she had refused the sexual advances of the Chief Operations Manager Defendant Chenault. In addition,

Defendants created an intolerable work environment and retaliated against her for her complaints.

49. The conduct of Defendants, by and through their agents, employees, supervisors, and managers, and Defendants' failure to take prompt investigative and remedial action to prevent continued harassment of Plaintiff, deprived her of statutory Rights under the New Mexico Human Rights Act.
50. The unlawful employment practices complained of and the actions of Defendants and/or their agents were willful, wanton, intentional and with malice or with reckless indifference to Plaintiff's statutorily protected Rights, entitling Plaintiff to damages in the form of compensatory and punitive damages to punish Defendants for their actions and to deter them, and others, from such actions in the future.
51. As a direct, proximate and foreseeable result of defendants' actions, Plaintiff has suffered past and future pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life, loss of dignity, emotional distress and other non-pecuniary losses and intangible injuries.

**COUNT II**  
**VIOLATION OF THE NEW MEXICO HUMAN RIGHTS ACT**  
**RETALIATION**

52. Plaintiff repeats and realleges allegations contained in Paragraphs 1 through 51 as set forth above.

53. Defendants violated the New Mexico Human Rights Act by retaliating against Plaintiff for complaining about the sexual harassment and gender-based discrimination to which she was subjected, with such practices constituting an unlawful employment practice pursuant to New Mexico State Law. Defendants took tangible adverse employment actions against Plaintiff, by and through the actions of their agents, when, in retaliation for her refusal to date Defendant Chenault and for having complained of other incidents in which she was subjected to sexual harassment by her fellow co-workers.
54. A legitimate, nondiscriminatory and/or nonretaliatory reason does not exist to justify defendants' intentional disparate and retaliatory treatment of Plaintiff.
55. The unlawful employment practices complained of and the actions of Defendants and/or their agents were willful, wanton, intentional and with malice or with reckless indifference to Plaintiff's protected Rights, entitling her to damages in the form of compensatory and punitive damages to punish Defendants' for their actions and to deter them, and others, from such actions in the future.
56. As a direct, proximate and foreseeable result of defendants' actions, Plaintiff has suffered past and future pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life, loss of dignity, emotional distress and other non-pecuniary losses and intangible injuries.

**COUNT III**  
**VIOLATION OF TITLE VII – SEXUAL HARASSMENT**

57. Plaintiff repeats and realleges allegations contained in Paragraphs 1 through 56 as set forth above.
58. The actions of Defendants, by and through the conduct of their agents, employees, supervisors, officers and directors, were based on Plaintiff being female.
59. Plaintiff, by being subjected to this sexual harassment and sexually hostile, offensive and anti-female work environment created by Defendants, was unreasonably affected in a “term, condition, or privilege” of employment under 42 U.S.C.A. § 2000e-2(a) (1), and that her psychological well-being was seriously affected. Moreover, Defendants took a tangible, adverse employment action against Plaintiff, by and through the actions of their agents, when they allowed Plaintiff to be subjected to acts of sexual harassment and allowed for her to be demoted because she refused a supervisor’s sexual advancements. Moreover, Defendants created an intolerable work environment and retaliated against her for her complaints.
60. The conduct of Defendants, by and through their agents, employees, supervisors, and managers, and Defendants’ failure to take prompt investigative and remedial action to prevent continued harassment of Plaintiff, deprived her of statutory Rights under 42 U.S.C.A. §§ 2000e et seq.
61. The unlawful employment practices complained of and the actions of Defendants and/or their agents were willful, wanton, intentional and with

malice or with reckless indifference to Plaintiff's protected Rights, entitling her to damages in the form of compensatory and punitive damages to punish Defendants' for their actions and to deter them, and others, from such actions in the future.

62. As a direct, proximate and foreseeable result of defendants' actions, Plaintiff has suffered past and future pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life, loss of dignity, emotional distress and other non-pecuniary losses and intangible injuries.

**COUNT IV**  
**VIOLATION OF TITLE VII – RETALIATION**

63. Plaintiff repeats and realleges allegations contained in Paragraphs 1 through 62 as set forth above.
64. Defendant violated Title VII by retaliating against Plaintiff for complaining about the sexual harassment and gender-based discrimination to which she was subjected, with such practices constituting an unlawful employment practice under 42 U.S.C.A. §§ 2000e et seq. Defendants took tangible adverse employment actions against Plaintiff, by and through the actions of their agents, when, in retaliation for her complaints they allowed for her to be further subjected to acts of sexual harassment by her fellow coworker and took no corrective measures when notified of the misconduct.

65. A legitimate, nondiscriminatory and/or nonretaliatory reason does not exist to justify Defendants' intentional disparate and retaliatory treatment of Plaintiff.
66. The unlawful employment practices complained of and the actions of Defendants and/or their agents were willful, wanton, intentional and with malice or with reckless indifference to Plaintiff's protected Rights, entitling her to damages in the form of compensatory and punitive damages to punish Defendants' for their actions and to deter them, and others, from such actions in the future.
67. As a direct, proximate and foreseeable result of defendants' actions, Plaintiff has suffered past and future pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life, loss of dignity, emotional distress and other non-pecuniary losses and intangible injuries.

**WHEREFORE**, Plaintiff prays that this Court order the following relief:

- a. The Court issue a permanent injunction enjoining Defendant, its agents, successors, employees, attorneys and those acting in concert with them from engaging and continuing to engage in the unlawful practices set forth herein or committing any other practice shown to violate Title VII of the Civil Rights Act of 1964;
- b. A judgment against Defendants awarding Plaintiff an amount equal to the lost wages and employment benefits had Plaintiff not been forced

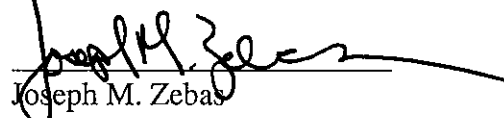
to resign by Defendants in violation of Title VII, § 1981 and the New Mexico Human Rights Act;

- c. A judgment against Defendants awarding Plaintiff compensatory damages as redress for Defendants' unlawful conduct under Title VII, § 1981 and the New Mexico Human Rights Act;
- d. A judgment against Defendants awarding Plaintiff compensation for past and future pecuniary losses, including but not limited to emotional pain, suffering, inconvenience, loss of enjoyment of life and humiliation, in amounts to be determined at trial;
- e. Punitive damages awarded to the Plaintiff as a result of Defendants' intentional illegal misconduct in an amount to be more fully proved at the time of trial;
- f. Plaintiff be awarded costs in this action, and reasonable attorneys fees as provided by Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981; and
- g. The Court grant any other legal or equitable relief deemed appropriate and proper.

DATED this 26<sup>th</sup> day of December, 2007.

**Respectfully submitted by:**

**Zebas Law Firm, LLC**

A handwritten signature in black ink, appearing to read "Joseph M. Zebas", written over a horizontal line.

Joseph M. Zebas  
206 West Snyder  
P.O. Box 1675  
Hobbs, New Mexico 88241  
(505) 393-1024  
*Attorney for Plaintiff*

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Carol Cueto
P.O. Box 1882
Lovington, NM 88260

From: Albuquerque Area Office
505 Marquette, N.W.
Suite 900
Albuquerque, NM 87102

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No. 39B-2007-02142
EEOC Representative Joseph A. Jones, Investigator
Telephone No. (505) 248-5187

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA): This is your Notice of Right to Sue, issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

- More than 180 days have passed since the filing of this charge.
[X] Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.
[X] The EEOC is terminating its processing of this charge.
The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.
The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

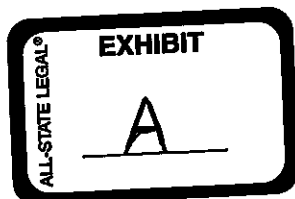
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Enclosures(s)

Georgia Marchbanks,
Area Office Director

(Date Mailed)

cc: Troy Teague
President
ABC RENTAL TOOL CO.
PO Box 1500
Hobbs, NM 88241



# CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Present to: Agency (ies) Charge No(s):

- FEPA
- EEOC

07-04-13-0242  
39B-2007-02142

**New Mexico Dept of Labor, Human Rights Division** and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Home Phone (Incl. Area Code)

Date of Birth

Ms. Carol Cueto

(505) 394-3155

06-10-1969

Street Address

City, State and ZIP Code

P.O. Box 1882, Lovington, NM 88260

Name of Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

No. Employees, Members

Phone No. (Include Area Code)

Name

15 - 100

(505) 394-3155

ABC RENTAL TOOL CO.

City, State and ZIP Code

Street Address

2200 Ave. O, Eunice, NM 88231

No. Employees, Members

Phone No. (Include Area Code)

Name

City, State and ZIP Code

Street Address

DISCRIMINATION BASED ON (Check appropriate box(es).)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

05-10-2006

03-26-2007

- RACE
- COLOR
- SEX
- RELIGION
- NATIONAL ORIGIN
- RETALIATION
- AGE
- DISABILITY
- OTHER (Specify below.)

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I. STATEMENT OF HARM: I was hired in December 2005. On or about May 10, 2006 I was promoted from the Secretary position to the Office Manager position. When the new secretary was hired, the male Vice President separated her from me in different offices because he said we talked. The male employees get to share an office. The VP began to act inappropriately with me because he wanted me to go out with him. In approximately June 2006, he kept sending me flowers for my birthday, and he told me he wanted me to be his girlfriend. I told him I did not want to be his girlfriend. After this he began retaliating against me. He started writing me up for days I missed, and took 25% of my pay one day for being a little late. In approximately December 2006 I emailed the President and told him what was going on. He did not respond to my complaint. On March 26, 2007 the VP told me he was demoting me to the Billing Clerk position.

II. RESPONDENT'S REASON FOR ADVERSE ACTION: I was not given a reason for the harm as alleged.

STATEMENT OF DISCRIMINATION: I BELIEVE I HAVE BEEN DISCRIMINATED AGAINST BECAUSE OF MY SEX, FEMALE (SEXUAL HARASSMENT) AND RETALIATED AGAINST IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT AND THE NEW MEXICO HUMAN RIGHTS ACT.

JP

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.  
SIGNATURE OF COMPLAINANT

4-9-7 

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Date

Charging Party Signature