

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

GERMAINE COACHMAN	:	
	:	
VS.	:	CIVIL NO.
	:	
CITY OF HARTFORD	:	JUNE 26, 2017

COMPLAINT

1. This is an action pursuant to the Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634, to redress the deprivation by the defendant of rights secured to the plaintiff by the laws of the United States. The defendant discriminated against the plaintiff in employment on the grounds of her age.

2. Jurisdiction of this court is invoked under the provisions of Sections 1331, 1343(3), and 1367(a) of Title 42 of the United States Code.

3. During all times mentioned in this action, the plaintiff was, and still is, an adult citizen of the United States residing in the State of Connecticut. She is over the age of sixty.

4. During all times mentioned in this action, the defendant was and is a municipal corporation in the State of Connecticut. The Hartford Police Department is a department of the defendant. It is and at all relevant times was

an employer within the meaning of the aforesaid statutes and at all relevant times employed more than one hundred individuals.

5. The plaintiff has complied with all of the procedural prerequisites to suit under the statutes aforementioned, having filed a timely complaint of age discrimination with the United States Equal Employment Opportunity Commission on or about February 5, 2016, and having received from the said Commission a Notice of Right to Sue dated May 1, 2017.

6. The plaintiff began employment with the defendant as a Police Officer in November 1995.

7. After eight years in the Patrol Division, in or about 2003, the plaintiff was assigned to the third shift, C Squad Booking/Detention Division. This assignment became increasingly desirable for the plaintiff as she grew older and less physically agile than younger officers.

8. The plaintiff's evaluations always were satisfactory or better.

9. In 2015, the Chief of Police arbitrarily removed the plaintiff from her said assignment and returned her to the Patrol Division, replacing her with Officer Hyland, an officer in his 40s. The Chief informed the plaintiff that Officer Hyland was facing discipline and that he wanted to remove him from direct contact with the public.

10. The assignment to the Patrol Division constituted an adverse

employment action against the plaintiff because, owing to her age, it was a far more undesirable assignment. It required her at times to pursue on foot much younger men who had committed crimes and to engage frequently in other very physically strenuous activity which was not required in the Booking Division.

11. The plaintiff asked to be reassigned to the Booking Division's Day Shift, an assignment approximately as desirable to the plaintiff, because of her age, as the assignment in which she had been replaced by Officer Hyland.

12. The Chief of Police refused to assign the plaintiff to the Booking Division Day Shift solely on the ground that he did not wish to inconvenience to much younger officers, with less seniority than the plaintiff, who currently had that assignment.

13. Officer Israel Zea, an officer in his 40s, then was assigned to the Booking Division Day Shift but the two young officers already assigned there were not removed as the plaintiff had been when Officer Hyland was placed in his position.

14. On April 8, 2015, the plaintiff filed an internal complaint objecting that she was being subjected to discrimination because of her age on account of the events described above.

15. In December 2015, Sgt. Andrew Lawrence, the investigator assigned to the plaintiff's complaint, informed the plaintiff that she would not be given any

relief from her patrol division assignment and that “a thick-skinned approach is suggested to prevent festering of future situations.”

16. In the manner described above, the plaintiff was subjected to adverse employment action because of her age and in retaliation for complaining about age discrimination.

17. As a result, the plaintiff suffered economic losses and emotional distress, and was constrained to retire from the Police Department earlier than she otherwise would have done.

WHEREFORE, the plaintiff claims judgment against the defendant as follows:

- A. Compensatory damages in an amount this court shall consider to be just, reasonable and fair;
- B. Attorney fees and the costs of this action;
- C. Such other relief as this court shall consider to be fair and equitable.

The plaintiff claims trial by jury.

THE PLAINTIFF

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