

RETURN: DECEMBER 27, 2011

BRUCE R. BONNER, SHAFIQ	:	SUPERIOR COURT
ABDUSSBAUR, CRAIG S. ALSTON,	:	
MALCOLM DAVIS, JR., MILT	:	
JACKSON, ALBERT McFADDEN, JR.,	:	
SAMSON REED, MITCHELL	:	
STRICKLAND, RAHQUE J. TENNANT	:	J. D. OF NEW HAVEN
and TIMOTHY P. WILSON	:	
VS.	:	
CITY OF NEW HAVEN	:	NOVEMBER 25, 2011

### COMPLAINT

1. This is an action pursuant to the Connecticut Fair Employment Practices Act, Conn. Gen. Stat. §§ 46a-60, *et seq.*
2. The plaintiffs have exhausted their administrative remedies, having filed timely complaints of unlawful discrimination with the Connecticut Commission on Human Rights and Opportunities, which found probable merit in their said complaints, and having obtained releases of jurisdiction, authorizing them to file this lawsuit, dated September 7, 2011.
  1. All of the plaintiffs are adult African-American males who have been patrol officers in the New Haven Police Department for many years.
  2. Each of the plaintiffs took and passed all necessary examinations for promotion to the rank of Sergeant in April 2009.
  3. As a result, each of the plaintiffs was placed on the eligibility list for

such promotion.

4. Prior to 2009, eligibility lists for promotion to the rank of Sergeant in the New Haven Police Department always has been effective for a total period of two years, computed in one-year increments.

5. On July 14, 2009, the New Haven Civil Service Board approved the promotion list containing the names of each of the plaintiffs. At that time, however, members of the Board explicitly stated that they were troubled by the fact that a majority of the persons on the list were African-American and that none of the persons on the list were Latino. At that time, the Board expressly agreed that the list would be allowed to expire after only one year solely for the purpose of limiting the number of African-Americans who could be promoted to the rank of Police Sergeant and increasing the likelihood that Latinos would receive such promotions.

6. On July 13, 2010, it was called to the attention of the New Haven Board of Police Commissioners that the promotional list would expire if not extended, as always had been done before. In its public meeting, the Commission contacted duly authorized representatives of the Civil Service Board and at that time was advised of the events which had transpired, as aforesaid, on July 14, 2009.

7. In accordance with its plan, the Civil Service Board allowed the promotional list to expire on July 14, 2010, and refused to extend it solely for the

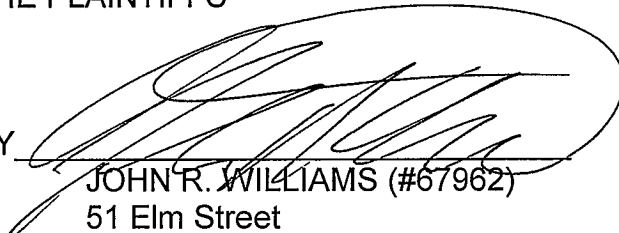
purpose of excluding African-American officers including the plaintiffs from being promoted and of making the positions for which the plaintiffs were eligible available instead to Latino officers.

8. In the manner described above, the defendant has discriminated against each of the plaintiffs because of his race, in violation of the Connecticut Fair Employment Practices Act.

WHEREFORE, the plaintiffs claim judgment against the defendant for compensatory damages, attorney fees, and injunctive relief.

THE PLAINTIFFS

BY

A large, stylized handwritten signature in black ink, enclosed within an oval shape. The signature appears to be "John R. Williams".

JOHN R. WILLIAMS (#67962)

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Their Attorney

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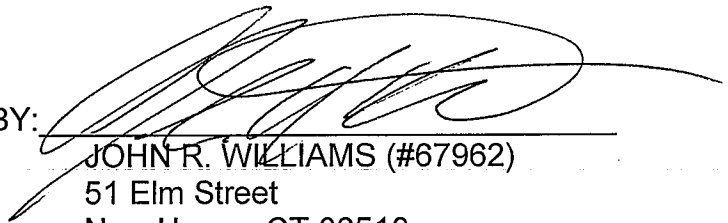
**PRAYER FOR RELIEF**

The plaintiffs claim judgment in an amount greater than fifteen thousand dollars (\$15,000.00), exclusive of interest and costs, 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 injunctive relief as this court shall consider to be fair and equitable.

THE PLAINTIFFS

BY:

A large, stylized handwritten signature in black ink, appearing to read 'John R. Williams', is written over a horizontal line.

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