



State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

West Central Region Office, 55 West Main Street, 2nd Floor, Suite 210, Waterbury, CT 06702

Promoting Equality and Justice for all People

November 20, 2019

City of New Haven
Roderick Williams, Deputy Corporation Counsel
165 Church Street 4th Floor
New Haven, CT 06510

RE: CHRO No.: 2030255 Bartlett vs. City of New Haven
EEOC No.: 16A202000209

Dear Respondent:

A complaint, referenced above, has been filed against you with the Commission. A copy of the complaint is attached.

The enclosed General Notice advises you of your rights, duties and responsibilities. Please read carefully the information contained in the notice. The enclosed Notice Regarding Out of State Attorneys advises that all attorneys practicing before the Commission must be admitted to practice law in Connecticut and that it is the responsibility of all counsel to comply with Connecticut practice rules. Also enclosed is important information with respect to the no fault conciliation process. The Commission is available to assist you if you wish to pursue settlement of this complaint. If you wish to conciliate the complaint prior to providing an answer, you must notify the Commission within **10 days** of receipt of the enclosed complaint.

You must file a written answer to the complaint under oath with the Commission within 30 days of receipt of this complaint unless pre-answer conciliation has been requested. If you fail to answer the complaint within this time, you may be defaulted by the Commission. Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. You must email a scanned copy of your signed and notarized answer to susan.mota@ct.gov and chro.westcentral@ct.gov

You have a duty to certify to the Commission that you have provided the complainant with copies of all documents you file with the Commission. You also have a duty to ensure that personal identifying information is redacted from any documents provided to the Commission. Personal identifying information includes an individual's mother's maiden name; motor vehicle operator's license number; Social Security number; other government issued identification number except for juris, license, permit or other business related identification numbers that are otherwise made available to the public directly by any government agency or entity; health insurance identification number; or



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West Central Region Office, 55 West Main Street, 2nd Floor, Suite 210, Waterbury, CT 06702

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any financial account number, security code or personal identification number (PIN). For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

Shawn Burns, Regional Manager
West Central Region

Enclosures: Affidavit
Schedule A Request for Additional Information
General Notice
Certification of Mailing
Notice Regarding Out of State Attorneys



State of Connecticut
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

West Central Region Office, 55 West Main Street, 2nd Floor, Suite 210, Waterbury, CT 06702

Promoting Equality and Justice for all People

November 20, 2019

Jason Bartlett
22 Howard Ave R2
New Haven, CT 06519

RE: 2030255 Bartlett vs. City of New Haven

Dear Sir/Madam:

This letter confirms that your complaint, referenced above, has been filed with the Commission.

The enclosed General Notice advises you of your rights, duties and responsibilities. **Please read carefully the information contained in the notice.**

You have a duty to respond timely to any information or assistance requested and to cooperate with the Commission at all times. It is your sole duty and responsibility to notify the Commission of your whereabouts at all times throughout the pendency of this complaint. In the event that your address, telephone number or email address changes, it is your duty to notify the Commission immediately in writing. **Parties are encouraged to submit all filings by email only without an additional hardcopy if possible. Emailed filings with susan.mota@ct.gov; chro.westcentral@ct.gov should be emailed to: Commission on Human Rights & Opportunities, Rowland State Government Center, 55 West Main Street, Suite 210, Waterbury, CT 06702.**

Also, you have a duty to certify to the Commission that you have provided the Respondent with copies of all documents you file with the Commission. For your convenience and use, the enclosed Certification Form is made available.

If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

Shawn Burns, Regional Manager
West Central Region
Encl.

cc: Complainant's Attorney: Cynthia Jennings

**STATE OF CONNECTICUT
Commission on Human Rights and Opportunities
Complaint Processing and Investigation**

APPEARANCE

CHRO CASE NO. 2030255

EEOC NO.

NAME OF CASE:

Jason Bartlett v. City of New Haven

PLEASE ENTER THE APPEARANCE OF:

Cynthia Jennings, Esq.
340 Broad Street; Suite 300
Windsor, CT 06095
Tel: 860.883.6947

For: The Complainant—JASON BARTLETT

Sign Here: _____ /s/ _____
Cynthia R. Jennings, Esq.

11/18/2019
Date

CERTIFICATION

I hereby certify that a copy of the above was e-mailed/delivered to:

Sign Here: _____ /s/ _____
Cynthia R. Jennings, Esq.

November 18, 2019
Date

**State of Connecticut
Commission on Human Rights and Opportunities
55 West Main Street
Waterbury, Connecticut**

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

RECEIVED
STATE OF CONNECTICUT
NOV 19 2019
Comm. On Human Rights & Opportunities
WEST CENTRAL REGION

FOR CHRO USE ONLY

Case No. 2030255
EEOC No. _____

Date: _____
Comm. On Human Rights & Opportunities
WEST CENTRAL REGION

My name is Jason Bartlett
My mailing address is 22 Howard Avenue R2; New Haven, CT 06519
My email address is jasonwbartlett@gmail.com
The respondent is City of New Haven
Whose business address is 165 Church Street; New Haven, CT 06510

I was ...

(write the date on or about when the discrimination occurred next to the kind of act):

- _____
- terminated not hired/promoted _____
- suspended _____ not rented a dwelling _____
- placed on probation _____ Harassed 11/11/19 sexually harassed
9 Corp Counsel brought letter to my house on a Sunday _____
- demoted earning a different rate of pay _____
- warned _____ constructively discharged _____
- given a poor evaluation _____ retaliated against 8/5/2019 mayoral candidate called for my termination _____
- denied a raise not hired due to a BFOQ _____
- less trained _____ not hired due to a disability _____
- denied an office _____ delegated difficult assignments _____
- denied service(s) _____ other placed on paid admin. Leave on 6/27/19 to present 11/19/19 _____

I believe that my:

- race national origin ancestry color

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

- | | | | |
|--------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <input type="checkbox"/> age | <input type="checkbox"/> alienage | <input type="checkbox"/> religion | <input type="checkbox"/> creed |
| <input type="checkbox"/> marital status | <input type="checkbox"/> familial status | <input checked="" type="checkbox"/> sex: <input checked="" type="checkbox"/> male <input type="checkbox"/> female | |
| <input checked="" type="checkbox"/> sexual orientation | <input type="checkbox"/> physical disability | <input type="checkbox"/> pregnancy | |
| <input type="checkbox"/> mental disability/disorder | <input type="checkbox"/> learning disability | <input type="checkbox"/> prior criminal record | |
| <input type="checkbox"/> lawful source of income | <input checked="" type="checkbox"/> previous opposition to discriminatory conduct | | |

Was in part a factor in this action.

I believe that the respondent violated the following statutes and acts listed below, as amended, enforced through CONN. GEN. STAT. § 46a-58(a) if applicable:

- | | |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> CONN. GEN. STAT. § 46a-60(b)(1) | <input checked="" type="checkbox"/> Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2 (cite for 15 or more individuals employed) |
| <input checked="" type="checkbox"/> CONN. GEN. STAT. § 46a-60(b)(4) | <input type="checkbox"/> Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634 (cite for 20 or more individuals employed) |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-60(a)(5) | <input type="checkbox"/> Americans with Disabilities Act, 42 U.S.C. § 12101 et seq. |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-60(a)(7) | <input type="checkbox"/> Equal Pay Act of 1964, U.S.C. § 206 |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-60(a)(8) | <input checked="" type="checkbox"/> Section 504 of the Rehabilitation Act of 1973 |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-64 | |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-70 | |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-71 | |
| <input type="checkbox"/> CONN. GEN. STAT. § 46a-80 | |
| <input checked="" type="checkbox"/> CONN. GEN. STAT. § 46a-81 | |
| <input type="checkbox"/> Other _____ | |

(PLEASE TYPE & NUMBER EACH ALLEGATION – ADD ADDITIONAL PAGES IF NEEDED)

I provide the following particulars:

SEE CHRO AFFIDAVIT ATTACHED

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

1. My name is Jason Bartlett, I reside at 22 Howard Avenue R2 in New Haven, CT 06519. I am an African American gay, LGBT male and I am the Complainant in this matter.
2. The Respondent is the City of New Haven and their address is 165 Church Street; New Haven, CT 06510. The Respondent employs more than 15 employees.
3. I began my employment with the City of New Haven in or around **January 1, 2014** as the Director of Youth Services for the City of New Haven. In this position, I was responsible for planning, organizing and directing programs and policy development for youth of the City of New Haven.
4. On **February 1, 2018** I was reappointed to the position of Director of Youth Services, City of New Haven for a term of four years, ending on **January 31, 2022**.
5. In or around June 27, 2019, I was placed on paid administrative leave pending the outcome of a fact-finding investigation regarding alleged possible misconduct. Amid rumors of an FBI Investigation, Corporation Counsel John Rose was quoted in the New Haven Independent dated June 25, 2019, that "Earlier this month New Haven's Office of Corporation Counsel received a federal subpoena requesting **city documents**. City officials are cooperating fully and working to compile the requested documents. Neither the Mayor, the Mayor's Office nor any member of the Mayor's administration is named in the subpoena."
6. Chief of Staff Tomas Reyes (Hispanic Male) and City Labor Relations Chief Tom McCarthy (White Male) were present to remove me from my position. Corporation Counsel John Rose (Black Male) was

quoted in the June 25, 2019 issue of the New Haven Independent, that "...Neither the Mayor, the Mayor's Office nor any member of the Mayor's administration is named in the subpoena." As an employee of the City of New Haven, I was not afforded the protections that similarly situated non-gay employees were afforded.

7. Since no members of the Mayor's administration were named in the subpoena, why was I removed from my office, relieved of my duties, placed on administrative leave, and treated and regarded as if I were a common criminal? No one else was subjected to this form of public humiliation and discriminatory treatment.
8. I received a telephone call from the Mayor's office while I was out on administrative leave, pending the outcome of an alleged investigation. In this phone call, I was asked to report to work on Tuesday, November 12, 2019; I later received another call from the Mayor's office stating that Corporation Counsel advised the Mayor's office that there was a document that kept me from reporting to work. I was then told to report to work on Wednesday, November 13, 2019. In addition, the Corporation Counsel took the extraordinary step to drive to my house on a Sunday and leave a handwritten envelope in my mailbox with a copy of a memo on Corporation Counsel stationary stating this is to reiterate that you are not to show up to work on Tuesday. I received yet another call on Tuesday, November 12, 2019 from the Mayor's office, telling me not to report to work on Wednesday November 13, 2019, explaining that the document in question, was a draft that had to be finalized. To date, I have not been presented with any investigative report, charges or other documents relative to my return to work. No other individuals working for the City of New Haven, have been faced with this indecisive, humiliating, and unjust lack of respect. This discriminatory hurtful treatment and gross violation of my civil rights has caused me extreme emotional distress. It has affected how I am viewed within the city, and it has given pause for others to speculate as to exactly what I have done to receive this type of treatment.
9. In or around August 5, 2019, the New Haven Independent covered a story by then Mayoral candidate, Justin Elicker (White Male), calling for Mayor Harp (Black Female) to fire me. The headline in the New Haven Independent stated "Elicker: Fire Bartlett."

10. Why would then Mayoral candidate, now Mayoral-Elect Justin Elicker (White Male) call for a middle management Black, gay male to be fired from the City of New Haven when he was aware that “no member of the Mayor’s administration” was named in the subpoena issued to the City of New Haven? ***What is Mr. Elicker’s non-discriminatory reason for calling for the termination of a Black, gay, New Haven city employee who is not an elected official?***
11. The most damaging and distressing part of the discrimination based on my protected class, was the **segregation** that was overtly forced onto myself and my staff and the public in general. During this period of time while I was allegedly awaiting a decision on an internal investigation that never got off of the ground, I was moved away from my staff; moved away from my job; placed under a gag order; told that I could not interact or explain what was happening to me to the public; instructed not to speak to me and my staff were instructed not to speak to me, told to stay away from the campaign and campaign workers were told to not to communicate with me.
12. I was totally **segregated** from what I knew and loved to do, and I suffered the real effects of segregation in all aspects of my work life and public life.
13. I am demanding that I be immediately returned to work, and that the entire administration cease and desist in this racist, homophobic scenario where I am the ultimate scape goat. My civil rights have been continually violated, and I am looking for immediate reinstatement into my job.
14. To date, there has been no investigative report that would continue to keep me out of work. There have been no additional findings that would prevent me from returning to my job, there has been no due process relative to this inaction by the City of New Haven; every one of my employee evaluations have been satisfactory or above; I have not been charged with any crimes; I have not been convicted of any crimes, and I am asking that the continued violation of my civil rights stop, and that I be immediately allowed to return to work. I am not under investigation; I have not been removed from my

position for cause; I am still an employee of the City of New Haven, and I am under contract with the City of New Haven until January 31, 2022. There is no reason to continue to publicly humiliate me in this racist and homophobic manner, as an employee of the City of New Haven.

15. I further understand, that now that I am out of my job, Community Services Administrator by the name of Dr. Dakibu Muley (Hispanic/Black Male) is now assuming my duties.
16. As a director, I gave all access to MUNIS, to my Business Manager, Gwen Busch. Most directors have access to MUNIS. I chose **not** to have access to this financial tool, for the specific purpose of not even having the **perception** of inappropriate utilization of the City's financial resources. A simple internal investigation would clear up this issue, yet I have been out of work for months, waiting for an alleged investigation that has never taken place. Where is the due process that every employee should be afforded? Why am I being denied the right to due process in this matter? Why am I put out of work for 4 ½ months? Why, when the Mayor asked me to return to work, was I further prohibited from returning? Why have I not been presented with a copy of the Investigative Report? Why have my rights not been protected by the City?
17. By way of naming **comparators** relative to my complaint, Gwen Busch (Black Female), the Business Manager/Youth at Work Coordinator, who works in the same department that I work in, was **not** placed on administrative leave, and no disciplinary action was taken against her for awarding a contract to a group where she had a conflict of interest. There was no need for restitution in this matter, as the work was done, however, Gwen was never disciplined, and she was not placed on administrative leave while an investigation took place, and she was not publicly humiliated in the media for weeks at a time. I consider her to be a valid comparator in this matter.
18. An additional **comparator** is Dr. Carol Birks, former Superintendent of Schools who I was partially responsible for bringing to New Haven. I was the liaison between the Mayor's office/Youth Department and the Board of Education when Carol Birks took over

as Superintendent of Schools. Birks immediately cut me off from my position as Liaison between the City of New Haven and the New Haven Public Schools. I was not afforded the same protections through the Administration and Corporation Counsel, that my other similarly situated non-gay colleagues were afforded.

19. In her capacity as Superintendent of New Haven Schools, Birks had the Mayor instruct her Executive Assistant, Andrea Scott to remove me from the invitation list for all meetings relevant to education, including weekly Mayoral updates; meetings with board members and the superintendent; staff and board briefings and updates and thus hindering my work and effectiveness on education/youth issues.
20. Birks cut off financial support and collaboration for Youth Stat and other Youth Programs critical to successful outcomes in the city. Participation in these meetings was critical to my doing my job as Youth Program Director. Cutting me off from these meetings had the effect of preventing me from being able to effectively do my job. Again, this issue went largely unaddressed.
21. Superintendent Birks expressed in no uncertain terms, her perception of me. There homophobic, hateful statements were made in or around **November 7, 2018** to Attorney Andrew Crumbie, who was tasked with conducting an inquiry into a complaint lodged by Ms. Birks against School Board Chairman, Darnell Goldson. Birks made these statements in the presence of Andrew Crumbie, Esq., in the course of an inquiry initiated by Corporation Counsel and the Mayor's office. The statement in question was that "I grew up loved. I am not like Jason Bartlett, a bi-racial; adopted; gay male."
22. Andrew Crumbie related this discussion to Kelvin Roldan, a Fellow in Mayor Harp's office who was working on his Doctoral Dissertation at the time. At least two meetings were held on this matter between me, Roldan and the Mayor. At one point, the Mayor told Birks to make amends to me, and although she never admitted to this statement, she denied that she was homophobic. It was my stated belief that she should be terminated. There are multiple numbers of children who are gay, and for the Superintendent to

harbor such negative feelings relative to members of the gay community, is untenable and unacceptable.

23. Carol Birks was negative, and clearly homophobic. Her perception of me served as an attempt to separate me from my self-identification, which is that I am an African American gay male. I have never identified with being bi-racial. I have always identified myself as being Black. Her public statement about my racial identity, separated me from Blacks, and left me as an outlier, and her interpretation that “nobody loved me” was preposterous and simply false. The fact that she would describe me in this manner, explained in part, why she attempted to force me out of my position as Liaison between the Board of Education and the Youth Programs in the city.
24. No fact-finding was ordered when Birks removed me from any and all meetings between the Board and city Youth Programs, and no fact-finding was conducted when Birks cut off our financial support for these vital programs. When I spoke with the Mayor about how her actions were crippling my ability to do my job, the Mayor stated in pertinent part, that “You’re really not the Board liaison anymore.” Based on this statement by the Mayor of the City, Birks had successfully excluded me as the Board Liaison through her homophobic and discriminatory statements and actions.
25. This homophobic and discriminatory treatment of me by Dr. Birks falls under the Ongoing and Continuous Doctrine, as it was never resolved, and her comments regarding my race and sexual orientation went largely ignored and unaddressed by Corporation Counsel and the Administration. This failure to resolve or rectify these issues means that the now 300-day timeframe is extended because the issues were never addressed by the Respondent. Even though Dr. Birks no longer works for the City, her statements and actions continue to generate an environment of disregard, disrespect and disengagement of a gay man from the civil rights that all of us are afforded under federal and state law.
26. I am presenting an additional **comparator**, and an additional instance of discrimination based on my protected class of being a gay male. In 2013, I met Dr. Okafor during Mayor Harp’s campaign. I

was assigned to pick her up at the airport. After the election, most of us who were assigned to work with the city started in or around January 2014. Dr. Okafor started six or seven months later.

27. I was hired as management, Mike Carter (CAO), Dr. Okafor (CSA) and others were hired as administration and were part of the Mayor's cabinet.
28. My first employment experience with Dr. Okafor started in or around 2014 then she told me to find a mentor for a 3rd grader. I attempted to advise her that the program that I oversaw did not provide mentoring services for third graders, that the program was not set up for that. She demanded that I come up with a program, and she threatened progressive discipline on me. I complied.
29. In or around **December 28, 2017**, I received a letter from Mayor Harp. This letter suggested Dr. Okafor asked not to supervise me. I was never given a reason for Dr. Okafor expressing to Mayor Harp, the fact that she did not want to supervise me, however, preceding the letter, Dr. Okafor denied the Department of Youth (the Department under my supervision) an office for staff. This decision was overturned by the Chief of Staff, Tomas Reyes. In addition, Dr. Okafor attempted to deny one of my subordinates, Gwen Busch, a raise. That action was overturned by Mayor Harp.
30. Prior to my having any direct or personal contact or direct interaction with Dr. Okafor, Mayor Harp, tried to warn me about the fact that Dr. Okafor did not want to supervise me. Mayor Harp never told me why Dr. Okafor did not want to supervise me, only that it was apparent that she did not wish to do so.
31. For background purposes, in or around **January 12, 2017**, I received an email from Dr. Martha Okafor to do my annual evaluation even though I was no longer being supervised by her. I brought a copy of my self-evaluation with me.
32. Okafor told me that we would be doing a supervisor's evaluation together and ignored my self-evaluation. She proceeded

to write negative crib notes on the evaluation critiquing my professional responsibilities. I refused to initial these sections.

33. In the section entitled Ethics, Okafor wrote that I needed to have an improvement plan around **ethics!!!** I was completely flabbergasted and put Strongly Disagree in the space for my initials and did not initial it.
34. I went into the Chief of Staff, Tomas Reyes office and complained that Okafor was telling me I had to sign an evaluation and that she had basically put into the evaluation, that I was unethical.
35. The Chief of Staff seemed surprised that I was doing an evaluation with Okafor because she was no longer my supervisor.
36. Okafor came through the door and said, "Jason you have to sign the evaluation." I took the forms and began to write in the 'comment' section that I disagreed with the evaluation.
37. Okafor suggested that I was refusing to participate, and I said no, I just didn't want to endorse what she was saying. Okafor told me that she could call Michael Carter and do the evaluation with both of them to get me to initial and complete the evaluation. I told her that no one can force me to sign anything, and I continued to put "disagree" next to all the areas I had previously initialed.
38. Okafor said I couldn't write that and started yanking the paper away from me. She was basically bear hugging me trying to snatch the paper. I yelled out, "Martha, what are you doing... Don't touch me." I felt like this was getting out of hand, so I handed the paper to her and walked away.
39. I considered Okafor's actions to be **bullying** and **retaliatory** and in violation of my rights as a Black, gay male. Okafor no longer supervised me; however, she was attempting to threaten me with an unjust, poor evaluation, and further bully me with the fact that she would double team me with another supervisor present to 'make' me sign the evaluation.

40. Okafor ***created a hostile work environment*** by attempting to force me to sign a document that would threaten my future raises and employment, falsely claiming that I needed an “improvement plan” around ethics, with no evidence or documentation to support any of her claims relative to work performance or my evaluation.
41. It is my belief that Okafor did not want to supervise me, did not want to find housing for my unit, and did not want to give my staff member a raise, because she was discriminating and retaliating against me based for my engaging in protected activity based on my protected class basis and my reporting of multiple incidents of discriminatory actions on her part.
42. At the time that I was transferred out of Okafor’s CSA department, the Mayor moved me and another Black, LGBT male from under Okafor’s supervision. He and I were both transferred out on the same day in the same e-mail by Mayor Harp.
43. My new report was CAO Mike Carter. I set up a meeting to meet with my new supervisor so that I could find out what his goals and expectations were of me, and to let him know who I was. I sat down in his office in expectation of an amicable discussion, and he immediately lit into me by asking “Why are you here?” This was clearly not a supervision meeting. I was unceremoniously thrown out of his office, and the next few days were a week from hell.
44. In less than two weeks, Mike Carter reported to the Chief of Staff, Tomas Reyes, that I had molested a minor at Criscoulo Park; that he had received a call from the child’s grandmother reporting this incident, and he produced a fake police report to support his allegations. Carter submitted this false police report to Thomas Reyes, Chief of Staff; and the Mayor called the Chief of Police to inquire whether or not there had been any such investigation. The Police Chief stated that there was no such incident reported.
45. Mike Carter was the cabinet member in charge of Public Safety. He oversaw the Fire Department and the Police Department, and he repeatedly used his influence to attempt to have me terminated from my job and publicly humiliated in the media.

46. Mike Carter during the three-week period while I was under his supervision, was to personally spread a vicious rumor throughout members of the New Haven community, he was investigating me. The most vicious rumor that he spread in the three week period, was the fact that I had molested a child in Criscoulo Park. He told the Mayor, Chief of Staff, Reyes, and others that I was under investigation, and he even utilized a false police report to try to flag me as a child molester to the public. He even called the Police Commissioner, who in turn, contacted well known Pastors in the Black community, and subsequently, a letter was sent to the African-American Mayor's Association repeating this false and vicious rumor. One candidate for Mayor, Ira Johnson, used this rumor to report falsely, that I was arrested in this entire scenario.
47. I reported Mike Carter's false reports, and vicious rumors that he was spreading internally and externally, to the Human Resources Department, to ask that he be placed under investigation for the vicious things that he did to attempt to assassinate my character, and no one conducted an investigation into him for the vicious things that he did. This rises to the level of a hate crime that he perpetrated against me, by attempting to imply that as the Youth Director and a gay man, that I was using my position to molest young boys.
48. After less than three weeks under Mike Carter's supervision, the Mayor conducted her own investigation, and found out that Carter had been using false reports. She immediately moved me out from under him, while Tomas Reyes, the Chief of Staff, literally did nothing to conduct an investigation into Carter's claims, and he did nothing to protect me from his vicious attacks on my character or to investigate the manner in which he used his police powers to concoct false police reports and attempt to destroy lives, and violate the civil rights of others.
49. I reviewed the Police Report and the Supplemental Police report. The original report had my name on it because a friend of mine was driving my car. The supplemental police report corrected that fact that I was not present at the park, and I wrote an affidavit to the court and submitted it with the Supplemental Police Report,

demonstrating that I was not at Criscoulo Park at any time during the day in question. In fact, the assault that was mentioned was between two adults, and it was reduced to one adult poking another adult in the chest with his finger.

50. The vicious rumors and innuendos spread by Mike Carter resulted in a serious violation of my civil rights. Because nothing was done by the Chief of Staff and by the Human Resources Department, the situation got further and further out of hand. The Mayor was affected by anonymous letters being sent to the African American Mayor's Association, to local ministers and pastors, and the rumors being spread outside of City Hall, to members of the community, and more importantly, to the media.
51. At that time, I demanded that any and all communication put in my personnel file and or communicated by email by Michael Carter be redacted or removed from my file and a copy given to me of all such materials. I believe that all of this harassment and attempted entrapment, originated with Dr. Okafor's homophobic, discriminatory and retaliatory treatment of me which continued under her friend and colleague, Mike Carter.
52. The Mayor took me out from under Mike Carter's supervision, and had me report directly to her. This created more animosity within City Hall among the administration. While the Mayor was trying to find an answer that worked for me, and protected me, the internal animosity increased, and having me report directly to the Mayor created a situation where it appeared that I was receiving special benefits, when throughout the entire time working at City Hall, because Tomas Reyes failed to properly investigate matters that affected me, and because I was reporting directly to the Mayor, the internal pressure and resistance against me increased, and I was now losing literally all of the civil rights that I came to the city with, and that everyone else literally enjoys without ever having to think about them.
53. Daily, I was under stress, tension, embarrassment, anger and humiliation resulting from seeing Mike Clark and knowing that he intentionally tried to destroy my reputation and assassinate my

character, was by far the most egregious situation that I had ever gone through. Carter was intentionally attempting to destroy me, using the tools that he had at hand... false police reports from the very department that he supervised. The feeling that welled up in me every time I faced that man, was not at all pleasant. The damage and personal harm that I faced every day of my life following that reign of terror, initiated by Okafor and carried out by Carter, is something that no one should ever have to endure based on their protected class, something that they cannot change.

54. In July 1, 2017, I received an additional title and responsibilities as the Director of Youth Services and Liaison to the Board of Education Office of the Mayor. At this time, I received a salary increase from \$85,000 a year to \$105,000 due to my outstanding job performance and additional job duties.
55. At the time of Board of Alder budget hearings September-October 2018, I was publicly questioned by Alders about my raise. The OMB Budget director said he would send the BOA the notification and take care of it. The notification was never sent and there was no resolution to my salary increase. The Alders at the end of the year, the increase was included in passing monies for the deficit for the next year. The next year, they put the amount of my salary back to \$85,000. They publicly humiliated me the second year, and they refused to approve my salary increase two years in a row. This year they finally approved my increase.
56. At least 15 other employees' salaries were voted on and approved by the Alders over this two-year period. Every employee that the Mayor granted a raise to, received their raises over a three-year period. As a Black, gay male, I did not have my raises approved for a three-year period as my other similarly situated colleagues, and I received public humiliation every year when they questioned my right to have a raise, and subsequently voted my raises down on two occasions.
57. I am asking that the State of Connecticut Commission on Human Rights and Opportunities to investigate my claims of what I reasonably believe to be discrimination based on race, sexual orientation, and

retaliation, as well the establishment of a hostile work environment based on race and sexual orientation. I am also asking that CHRO secure my rights under local, state and federal laws.

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint, secure for me my rights as guaranteed to me under the above cited laws and secure for me any remedy to which I may be entitled.

Jason Bartlett being duly sworn, on oath, states that s/he is the Complainant herein; that s/he has read the foregoing complaint and knows the content thereof; that the same is true of her/his own knowledge, except as to the matter herein stated on information and belief and that as to these matters s/he believes the same to be true.

Dated in Waterbury CT on this 19th November 2019.

Jason Bartlett
Complainant's Signature

Subscribed and sworn before me on 11/19/19.
Date

Kathleen Bowden Jameson
Notary Public/Commissioner of the Superior Court

My commission expires: 10/31/24

OATH

I, **Jason Bartlett**, affirms, that he is the Complainant herein; that he has read the foregoing complaint and knows the content thereof; that the same is true of his own knowledge, except as to the matters herein stated on information and belief and that as to these matters, he believes the same to be true.

Dated at Watubury Connecticut this 19th day of November 2019.

Jason Bartlett
Jason Bartlett-Complainant

Subscribed and sworn to before me on this 19th day of November 2019.

Kathleen Boudh Janssens
Notary/Commissioner of the Superior Court

My Commission Expires 10/31/24

U.S. Equal Employment Opportunity Commission

<div style="border: 1px solid black; width: 100%; height: 100%; position: relative;"> <div style="position: absolute; top: 0; left: 0; width: 100%; height: 100%; border: 1px solid black;"></div> <p style="font-size: 24px; font-weight: bold; margin-top: 20px;">CITY OF NEW HAVEN</p> <p>165 Church Street New Haven, CT 06510</p> </div>	<p>PERSON FILING CHARGE</p> <p style="text-align: center; font-weight: bold; font-size: 18px;">Jason Bartlett</p> <p>THIS PERSON <i>(check one or both)</i></p> <p><input type="checkbox"/> Claims To Be Aggrieved</p> <p><input type="checkbox"/> Is Filing on Behalf of Other(s)</p> <hr/> <p>EEOC CHARGE NO. 16A-2020-00209</p> <hr/> <p>FEPA CHARGE NO. 2030255</p>
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NOTICE OF CHARGE OF DISCRIMINATION IN JURISDICTION WHERE A FEP AGENCY WILL INITIALLY PROCESS
(See the enclosed for additional information)

THIS IS NOTICE THAT A CHARGE OF EMPLOYMENT DISCRIMINATION UNDER

- Title VII of the Civil Rights Act (Title VII)
 The Equal Pay Act (EPA)
 The Americans with Disabilities Act (ADA)
- The Age Discrimination in Employment Act (ADEA)
 The Genetic Information Nondiscrimination Act (GINA)

HAS BEEN RECEIVED BY

- The EEOC and sent for initial processing to _____
(FEP Agency)
- The Connecticut Comm. On Human Rights & Opportunities and sent to EEOC for dual filing purposes.
(FEP Agency)

While EEOC has jurisdiction (upon expiration of any deferral requirement if this is a Title VII, ADA or GINA charge) to investigate this charge, EEOC may suspend its investigation and await the issuance of the Agency's final findings and orders. These findings and orders will be given weight by EEOC in making its own determination as to whether reasonable cause exists to believe that discrimination has occurred.

You are therefore encouraged to cooperate fully with the Agency. All facts and evidence provided by you to the Agency will be considered by EEOC when it reviews the Agency's final findings and orders. In many cases EEOC will take no further action, thereby avoiding the necessity of an investigation by both the Agency and EEOC. This likelihood is increased by your active cooperation with the Agency.

As a party to the charge, you may request that EEOC review the final findings and orders of the above-named Agency. For such a request to be honored, you must notify EEOC in writing within 15 days of your receipt of the Agency's final decision and order. If the Agency terminates its proceedings without issuing a final finding and order, you will be contacted further by EEOC. Regardless of whether the Agency or EEOC processes the charge, the Recordkeeping and Non-Retaliation provisions of the statutes as explained in the enclosed information sheet apply.

For further correspondence on this matter, please use the charge number(s) shown above.

Enclosure(s): Copy of Charge

CIRCUMSTANCES OF ALLEGED DISCRIMINATION

- Race
 Color
 Sex
 Religion
 National Origin
 Age
 Disability
 Retaliation
 Genetic Information
 Other

See enclosed copy of charge of discrimination.

Date	Name / Title of Authorized Official	Signature
November 20, 2019	Kevin J. Berry, District Director	

INFORMATION ON CHARGES OF DISCRIMINATION

EEOC RULES AND REGULATIONS

Section 1601.15 of EEOC's regulations provides that persons or organizations charged with employment discrimination may submit a statement of position or evidence regarding the issues covered by this charge.

EEOC's recordkeeping and reporting requirements are found at Title 29, Code of Federal Regulations (29 CFR): 29 CFR Part 1602 (see particularly Sec. 1602.14 below) for Title VII and the ADA; 29 CFR Part 1620 for the EPA; and 29 CFR Part 1627, for the ADEA. These regulations generally require respondents to preserve payroll and personnel records relevant to a charge of discrimination until disposition of the charge or litigation relating to the charge. (For ADEA charges, this notice is the written requirement described in Part 1627, Sec. 1627.3(b)(3), .4(a)(2) or .5(c), for respondents to preserve records relevant to the charge – the records to be retained, and for how long, are as described in Sec. 1602.14, as set out below). Parts 1602, 1620 and 1627 also prescribe record retention periods – generally, three years for basic payroll records and one year for personnel records. Questions about retention periods and the types of records to be retained should be resolved by referring to the regulations.

Section 1602.14 Preservation of records made or kept. Where a charge ... has been filed, or an action brought by the Commission or the Attorney General, against an employer under Title VII or the ADA, the respondent ... shall preserve all personnel records relevant to the charge or the action until final disposition of the charge or action. The term *personnel records relevant to the charge*, for example, would include personnel or employment records relating to the aggrieved person and to all other aggrieved employees holding positions similar to that held or sought by the aggrieved person and application forms or test papers completed by an unsuccessful applicant and by all other candidates or the same position as that for which the aggrieved person applied and was rejected. The date of *final disposition of the charge or the action* means the date of expiration of the statutory period within which the aggrieved person may bring [a lawsuit] or, where an action is brought against an employer either by the aggrieved person, the Commission, or the Attorney General, the date on which such litigation is terminated.

NOTICE OF NON-RETALIATION REQUIREMENTS

Section 704(a) of Title VII, Section 207(f) of GINA, Section 4(d) of the ADEA, and Section 503(a) of the ADA provide that it is an unlawful employment practice for an employer to discriminate against present or former employees or job applicants, for an employment agency to discriminate against any individual, or for a union to discriminate against its members or applicants for membership, because they have opposed any practice made an unlawful employment practice by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the statutes. The Equal Pay Act contains similar provisions. Additionally, Section 503(b) of the ADA prohibits coercion, intimidation, threats, or interference with anyone because they have exercised or enjoyed, or aided or encouraged others in their exercise or enjoyment, of rights under the Act.

Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made. Please note that the Civil Rights Act of 1991 provides substantial additional monetary provisions to remedy instances of retaliation or other discrimination, including, for example, to remedy the emotional harm caused by on-the-job harassment.

NOTICE REGARDING REPRESENTATION BY ATTORNEYS

Although you do not have to be represented by an attorney while we handle this charge, you have a right, and may wish to retain an attorney to represent you. If you do retain an attorney, please give us your attorney's name, address and phone number, and ask your attorney to write us confirming such representation.