

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

MAR 12 2007

JAMES N. MATTHEW, Clerk
By: *[Signature]*
Deputy Clerk

Donald Jones
Plaintiff

vs.

Wackenhut % Google Inc.
Defendant

1:07-cv-0567

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~~1:07-cv-0572~~

TITLE VII COMPLAINT

1. Plaintiff resides at 4550 Washington Road #6A
College PARK, GA 30349

2. Defendant(s) names (s) wackenhut and Google Inc.

Location of principal office(s) of the named defendant(s) 1100 Circle 75 PKWY #470
Atlanta GA 30339 and 101 Aquita Way Austell, GA30168

Nature of defendant(s) business Security Corporation and Computer Corporation

Approximate number of individuals employed by defendant(s) 500 or more and 800
or more.

***Note:** This is a form complaint provided by the Court for pro se litigants who wish to file an employment discrimination lawsuit. It is not intended to be used for other kinds of cases.

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. § 2000e-5. Equitable and other relief are also brought under 42 U.S.C. §e-5(g).

4. The acts complained of this suit concern:

- A. _____ Failure to employ me.
- B. X Termination of my employment.
- C. _____ Failure to promote me.
- D. _____ Other (Specify) _____

5. Plaintiff:

- A. _____ presently employed by the defendant.
- B. X not presently employed by the defendant. The dates of plaintiff's employment were February 2003 to 2006. The reasons plaintiff was given for termination of employment is/are:
 (1) _____ plaintiff was discharged.
 (2) _____ plaintiff was laid off.
 (3) X plaintiff left the job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

- A. X my race
- B. _____ my religion.
- C. _____ my sex.
- D. _____ my national origin.
- E. _____ Other (specify) Age

7. The name(s), race, sex and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is/are:

Mr. J. E. Penifold Race: White. Sex: Male. Title: Representative of Google

Ms. Linda Deming Race: White. Sex: Female Title: Payroll Manager.

Ms. Jennifer Turner Race: Black. Sex: Female Title: Project Manager.

Mr. Berkeley Godfrey Race: Black Sex: Male Title: Supervisor

8. Describe the discriminatory actions or events you are complaining of in this lawsuit. Give factual detail, including names and dates concerning what happened. You do not need to refer to any statutes or cite law.

I was employed by the wackenhut corporation on February 23, 2003.

I was assigns to the google facility the supervisor Ms. Jennifer Turner

stated that I was sleeping on the job and she is ready to fire everyone

I file a charge of discrimination with the EEOC. On June 9, 2006 \$137.62

was deduction from my payroll check. I call the payroll manager Ms. Linda

Deming and she said Ms. Turner order the deduction I call Ms. Turner and

she said that the payroll manager order the deduction. On June 14, 2006

I file a charge of retaliation with the EEOC. On July 21, 2006 a

overpayment adjustment of \$45.97 was deduction from my payroll check

again. On July 21, 2006 I was told by Ms. Turner that Google representative

Mr. J. E. Penifold observed me sleep in a chair while on post and

suspension me for three (3) days. On July 24, 2006 I file a amended

charge of employment discrimination with the EEOC.

9. The alleged illegal activity took place at Google Inc. 101 Aquilla WAY
Austell, GA 30168

10. A. X I have filed a charge with the Equal Employment Opportunity Commission regarding defendant(s). (I have attached a copy of my charge(s) filed with the Equal Employment Opportunity Commission, which are incorporated into this complaint.

B. _____ I have not filed a charge.

11. A. X I received a Notice of Right-to-Sue letter from the Equal Employment Opportunity Commission on DEC. 11, 2006 (date). (I have attached a copy of the Notice of Right-to-Sue which is incorporated into this complaint.)

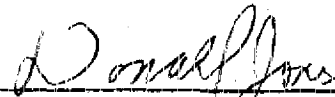
B. _____ I have not received a Notice of Right-to-Sue letter from the Equal Employment Opportunity Commission.

12. State what relief you are seeking from the Court. If you are seeking a monetary award (back pay or damages), state the amount you are seeking. If you are seeking injunctive relief (an order by the Court) issued against the defendant(s) summarize what should be in the order.

plaintiff is asking the court for monetary award for damages
in the amount of \$225,000.00 each defendant for \$450,000.00

March 12, 2007

Date



Signature of Plaintiff

Address: P.O. 261

Red Oak, GA 30272

Telephone: (678) 360-1505

DISMISSAL AND NOTICE OF RIGHTS

To: Donald Jones
P.O. Box 261
Red Oak, GA 30272

From: Atlanta District Office - 410
100 Alabama Street, S.W.
Suite 4R30
Atlanta, GA 30303

Empty checkbox

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

Table with 3 columns: EEOC Charge No., EEOC Representative, Telephone No.
Row 1: 410-2006-02081, Marlo Starks-Serrano, Investigator, (404) 562-6854

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- List of reasons for closing file with checkboxes:
- The facts alleged in the charge fail to state a claim...
- Your allegations did not involve a disability...
- The Respondent employs less than the required number...
- Your charge was not timely filed...
- Having been given 30 days...
- While reasonable efforts were made...
- You were given 30 days to accept a reasonable settlement...
- [X] The EEOC issues the following determination...
- The EEOC has adopted the findings of the state or local...
- Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost.

Equal Pay Act (EPA): EPA suits must be filed 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.

On behalf of the Commission

Handwritten signature of Bernice Williams-Kimbrough

Bernice Williams-Kimbrough, Director

DEC 11 2006

(Date Mailed)

Enclosures(s)

cc: Patricia B. Marmon
Director, EEO/AA Programs
WACKENHUT
1100 Circle 75 Parkway #470
Atlanta, GA 30339