

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

Case No. 4:01cv435-SPM

LONNIE B. LEE; MOSES RUSS, LEROY  
ROLLINS, LINDA L. SMITH, KAYUTRIS T.  
THOMAS, FRANK L. DICKENS, NORRIS N.  
CALHOUN; HENRY WILLIAMS; LEROY GEE,  
ALEAIN SCOTT, RENEE S. MURPHY, JONNA  
BOWERS; REBECCA C. CRAWFORD;  
DEBORAH E. MONEYHAM, DAVID B. SMITH.  
SUSIE M. HOLMES, ANNIE BRYANT, BETTY  
LEE. ERIC L. DANIELS, DAVID A. INGRAM.  
LOLA M. BLACK, MICHAEL L. JACKSON,  
CONNIE P. SMITH; HENRY LEE DAVIS; KAIN  
J. DAWSON, MAOLA D. HALL; DEBORAH  
DANIELS, L. C. COLEMAN, NATHAN A.  
WRIGHT; ANNIE D. COBB; BESSIE L. SIMS,  
JAMES H. SMITH; DERBY ROLLINS; SANDRA  
G. BARNES. MARGARET C. DILWORTH,  
VICKI L. HENDRIX, DRITCHES CLAY, SHON  
D. THOMAS. VERDELL SUTTON; MILDRED  
DOUGLAS, JERRY GODFREY, CORRINE  
BROWN. CAROLYN D. ALEXANDER, JAMES  
H. MOULTRY, JO ANN M. WILLIAMS;

U.S. DISTRICT COURT  
NORTHERN DIST. FLA.  
TALLAHASSEE, FLA.

2001 OCT -4 PM 3:42

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U.S. DISTRICT COURT  
NORTHERN DIST. FLA.  
TALLAHASSEE, FLA.

2001 OCT -3 PM 3:17

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SHIRLEY MCMILLIAN, VIRGINIA JACKSON,  
PAULINE G. BURNS, LETHERIA A.  
WILLIAMS, SUEBRENNNA JACKSON, JAMES  
KENNEDY, JR., AND PEARLIE M. DAWKINS,  
on behalf of themselves and all others similarly  
situated.

Plaintiffs,

v.

STATE OF FLORIDA and its DEPARTMENT  
OF CHILDREN AND FAMILY SERVICES,

Defendants.

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**COMPLAINT**

The Plaintiffs, Lonnie B. Lee, Moses Russ, Leroy Rollins, Linda L. Smith,  
Kayutris T. Thomas, Frank L. Dickens, Norris N. Calhoun, Henry Williams, Leroy Gee,  
Aleain Scott, Renee S. Murphy, Jonna Bowers, Rebecca C. Crawford, Deborah E.  
Moneyham, David B. Smith, Susie M. Holmes, Annie Bryant, Betty Lee, Eric L. Daniels,  
David A. Ingram, Lola M. Black, Michael L. Jackson, Connie P. Smith, Henry Lee  
Davis, Kain J. Dawson, Maola D. Hall, Deborah Daniels, L. C. Coleman, Nathan A.  
Wright, Annie D. Cobb, Bessie L. Sims, James H. Smith, Derby Rollins, Sandra G.  
Barnes, Margaret C. Dilworth, Vicki L. Hendrix, Dritches Clay, Shon D. Thomas,  
Verdell Sutton, Mildred Douglas, Jerry Godfrey, Corrine Brown, Carolyn D. Alexander,  
James H. Moultry, Jo Ann M. Williams, Shirley McMillian, Virginia Jackson, Pauline G.  
Burns, Letheria A. Williams, Suebrenna Jackson, James Kennedy, Jr., and Pearlle M.  
Dawkins, on behalf of themselves and all others similarly situated, sue the Defendants,  
State of Florida and its Department of Children and Family Services, and say:

## **JURISDICTION**

1. This is an action brought under the Civil Rights Act of 1964, 42 U.S.C., Section 2000e, et seq. The Plaintiffs allege a violation of 42 U.S.C., Section 2000e-2(a). The court has jurisdiction to hear this action under Section 42 U.S.C. Section 2000e-5(f)(1).

## **PARTIES:**

2. The Plaintiffs are Lonnie B. Lee, Moses Russ, Leroy Rollins, Linda L. Smith, Kayutris T. Thomas, Frank L. Dickens, Norris N. Calhoun, Henry Williams, Leroy Gee, Alcain Scott, Renee S. Murphy, Jonna Bowers, Rebecca C. Crawford, Deborah E. Moneyham, David B. Smith, Susie M. Holmes, Annie Bryant, Betty Lee, Eric L. Daniels, David A. Ingram, Lola M. Black, Michael L. Jackson, Connie P. Smith, Henry Lee Davis, Kain J. Dawson, Maola D. Hall, Deborah Daniels, L. C. Coleman, Nathan A. Wright, Annie D. Cobb, Bessie L. Sims, James H. Smith, Derby Rollins, Sandra G. Barnes, Margaret C. Dilworth, Vicki L. Hendrix, Dritches Clay, Shon D. Thomas, Verdell Sutton, Mildred Douglas, Jerry Godfrey, Corrine Brown, Carolyn D. Alexander, James H. Moultry, Jo Ann M. Williams, Shirley McMillian, Virginia Jackson, Pauline G. Burns, Letheria A. Williams, Suebrenna Jackson, James Kennedy, Jr., and Pearl M. Dawkins. All are people of color, African-Americans, employed by the Defendants. Each is employed in the forensic unit at the Florida State Hospital in Chattahoochee, Gadsden County, Florida. Each of the Plaintiffs has met all conditions precedent to the filing of this action. The notices of the right to sue of each of the identified plaintiffs are attached hereto as composite Exhibit A.

3 The Defendants are the State of Florida and its Department of Family Services. The principal offices of the Defendants are in Tallahassee, Leon County, Florida. The Defendants operate mental health institutions and forensic facilities in Gadsden County and in other locations in the State of Florida.

4. The Defendants employ and have employed more than fifteen persons in each of the twenty weeks preceding the filing of this action. The Defendants employ thousands of persons.

5. The Plaintiffs are employed by the Defendants in non-professional employment classifications in the forensic unit of the Florida State Hospital providing direct patient care and treatment to those who have been charged with crimes including felonies, but who are deemed incompetent to be tried because of an existing mental illness or condition; those who have been found not guilty of a criminal offense because they were found to be insane; and those who have subsequent to conviction for criminal offenses and while in the custody of the State become insane.

#### **CLASS ACTION ALLEGATIONS**

6 This action is brought as a class action under the provisions of Rule 23(a) as the class is so numerous that joinder of all members is impracticable; there are questions of law and fact common to the class; the claims of the representative parties are typical of the claims of the class; and the representative parties will fairly and adequately protect the interest of the class.

7. The Plaintiffs seek to represent a class of African-Americans.

8. The action is appropriately brought as a class action under Rule 23(b)(1) as the prosecution of separate actions by or against individual members of the class would

create a risk of inconsistent or varying adjudications with respect to members of the class which would establish incompatible standards of conduct for the party opposing the class, and as a practical matter adjudications under Rule 23(b)(2) as the Defendants have acted or refused to act on grounds generally applicable to the class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the class as a whole.

### **ALLEGATIONS OF UNLAWFUL EMPLOYMENT PRACTICE**

9. In calendar year 2000 the legislature amended Section 121.021(15), Florida Statutes, part of the legislation governing the Florida Retirement System. The change provided for an extension of the membership of the Special Risk Class of participants in the Florida Retirement System to include those who are employed in the professional health care bargaining unit or non-unit members who are employed by the Department of Corrections or the Department of Children and Family Services and meet the criteria of Section 121.0515(2)(f), Florida Statutes.

10. Participation in the Florida Retirement System provides a substantial increase in the annual accrual rate of the members of the Florida Retirement System. The accrual rate is one factor in the formula utilized by the State to determine an appropriate pension at the time of retirement. The State determines its pension for each employee based on a formula that multiplies the accrual rate by the years of service and by the average final compensation. The product of the formula becomes the retiree's pension benefit. The accrual rate for a general member is 1.6% for each year of service. The accrual rate for a member of the Special Risk class is 3% per year of service.

11. The legislature of the State of Florida states that the Special Risk Class of membership in the Florida Retirement System is to recognize that persons in certain classes of employment “are required as one of the essential functions of their positions to perform work that is physically demanding or arduous, or work that requires extraordinary agility and mental acuity, and that such persons, because of diminishing physical and mental faculties, may find that they are not able, without risk to health and safety to themselves, the public, or their coworkers, to perform such duties and thus enjoy the full career and retirement benefits enjoyed by persons.”

12. The change in retirement class participation and accrual rate was effective January 1, 2001, and affected 24 different classes of employees who work in and about the forensic units where the Plaintiffs and the class they seek to represent are employed. The change increased the accrual rate for retirement purposes of persons employed in those 24 classes from 1.6% to 3.0% per year of service. After January 1, 2001, The Plaintiffs continued to participate as regular members in the Florida Retirement System with an accrual rate of 1.6% per year of service.

13. The persons employed in the job classes referenced in Section 121.0515(2)(f), Florida Statutes and whose accrual rate was so dramatically increased were predominantly white. Over 75% of the persons whose accrual rate was increased were white.

14. The purpose of the increase in the accrual rate was articulated to be the exposure of the incumbents to a special risk or danger or exceptionally hard work. The Plaintiffs are constantly exposed to risk of attack from patients and are the ones who must

control the patients without benefit of batons or tear gas. Over 75% of the persons employed in the classes in which the Plaintiffs are employed are African-Americans.

15. The Plaintiffs serve in classes that provide constant and direct care and treatment to patients in the forensic units and they are constantly exposed to the hazards, dangers, perils, and arduous work that such care and treatment entail. The Plaintiffs, unlike the predominantly white employment classes that received an increase in the accrual rate, were denied special risk membership in the Florida Retirement System and the accompanying increase in the accrual rate.

16. The Plaintiffs are employed in the employment classes of Unit Treatment & Rehabilitation Specialist - Forensic, Unit Treatment & Rehabilitation Specialist Supervisor I – Forensic, Unit Treatment & Rehabilitation Specialist Supervisor II – Forensic, Human Service Worker I – F/C, Human Services Worker II – Forensic, Mental Health Program Counselor, Senior Licensed Practical Nurse –Forensic/Corrections Human Service Worker I – Forensic, Human Services Worker II – Forensic, Custodial Worker – Forensic, Mental Health Program Analyst, Human Services Counselor II – Forensic/Corrections and similar classifications. All employees in such classes work in the forensic units of State Mental Health Institutions operated by the State of Florida and its Department of Children and Families and have contact with patients more than 75% of their working time.

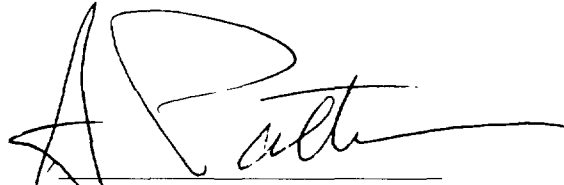
17. The Defendants treatment of the Plaintiffs and the class they represent as regular members of the Florida Retirement System who earn retirement through the Florida Retirement System as regular members with a 1.6% accrual rate for each year of service while treating employment classes with similar working conditions but that are

composed predominantly of white persons as Special Risk members of the Florida Retirement System with an accrual rate of 3% per year of service has a disparate and adverse impact on African-Americans. Such disparate treatment perpetuates discrimination against African-Americans and rewards African-Americans with a pension that is a much smaller percentage of their average final compensation than the pension earned by other employees in the same forensic units who are employed in classes that are composed of predominantly white employees. This is an act of discrimination that violates the Civil Rights Act of 1964 as amended.

WHEREFORE, the Plaintiffs request that this court assume jurisdiction over this cause, certify the Plaintiffs as the class representatives of a class composed of African-American employees of the State of Florida and its Department of Children and Family Services who are employed in classes where their employment duties require them to spend at least 75% of their working time performing duties which involve contact with patients or inmates in a correctional or forensic facility or institution; grant an expedited hearing; grant declaratory relief that finds that the Defendants violated the Civil Rights Act of 1964 by providing a pension plan to those employees who work in forensic units and in classes that are predominantly composed of white persons that is a more favorable retirement plan than those who work in forensic units and in classes that are predominantly composed of African Americans or people of color; grant a permanent injunction that directs the defendants to grant the Plaintiffs and the class that they represent membership in the Special Risk class of the Florida Retirement System retroactive to January 1, 2001; grant the Plaintiffs costs of their action and a reasonable attorneys fee; grant such other and further relief as the court deems appropriate and just.



Dated: October 3, 2001.

A handwritten signature in black ink, appearing to read "Ben R. Patterson", written over a horizontal line.

Ben R. Patterson  
Florida bar No. 124377

PATTERSON & TRAYNHAM  
315 Beard Street  
Post Office Box 4289  
Tallahassee, Florida 32315  
TEL: (850) 224-9181  
FAX: (850) 222-7438



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
0922 9320

Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968

July 6, 2001

Mr. L.C. Coleman, Jr.  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, The Dept. of Children and Family  
Services, et al.  
No. 151A11030

Dear Mr. Coleman, Jr.:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, The Dept. of Children and Family Services, et al



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**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mr. Nathan A. Wright  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11106

Dear Mr. Wright:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

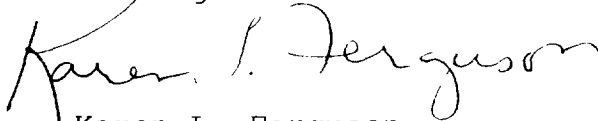
If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



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Civil Rights Division

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Employment Litigation Section  
P.O. Box 65968  
Washington, DC 20035-5968

July 6, 2001

Ms. Lela M. Black  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11109

Dear Ms. Black:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mr. Michael L. Jackson  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11059

Dear Mr. Jackson:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P.O. Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mrs. Connie P. Smith  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11089

Dear Mrs. Smith:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P.O. Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mr. Henry Lee Davis  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11035

Dear Mr. Davis:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mr. Kain J. Dawson  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11038

Dear Mr. Dawson:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.





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Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mrs. Maeola D. Hall  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11050

Dear Mrs. Hall:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Mrs. Deborah Daniels  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11033

Dear Mrs. Daniels:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968

July 6, 2001

Ms. Annie D. Cobb  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11029

Dear Ms. Cobb:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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0922 9368

*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Ms. Bessie L. Sims  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11117

Dear Ms. Sims:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title I of the Americans with Disabilities Act of 1990, 42 U.S.C. 12111, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson ()  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
0922 9375

*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Lonnie B. Lee  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11068

Dear Mr. Lee:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

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Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968

June 29, 2001

Mr. Moses Russ  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11086

Dear Mr. Russ:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

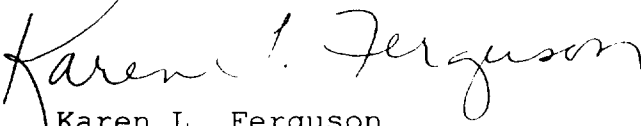
If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Leroy Rollins  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11085

Dear Mr. Rollins:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mrs. Linda L. Smith  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11092

Dear Mrs. Smith:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.





**U.S. Department of Justice**

**Civil Rights Division**

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WITHIN 90 DAYS**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mrs. Kayutris T. Thomas  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11096

Dear Mrs. Thomas:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Frank L. Dickens  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11039

Dear Mr. Dickens:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Norris N. Calhoun  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11025

Dear Mr. Calhoun:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Henry Williams  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11099

Dear Mr. Williams:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Leroy Gee  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11113

Dear Mr. Gee:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Ms. Aleain Scott  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11087

Dear Ms. Scott:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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*Employment Litigation Section  
P.O. Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mrs. Renee S. Murphy  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11079

Dear Mrs. Murphy:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Jonna Bowers  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11020

Dear Mr. Bowers:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

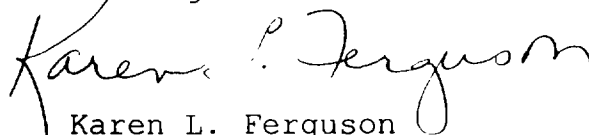
If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.





U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Ms. Rebecca C. Crawford  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11032

Dear Ms. Crawford:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mrs. Deborah E. Moneyham  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11115

Dear Mrs. Moneyham:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. David B. Smith  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11090

Dear Mr. Smith:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P.O. Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Ms. Susie M. Holmes  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11055

Dear Ms. Holmes:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mrs. Annie Boyd Bryant  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11022

Dear Mrs. Bryant:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

**NOTICE OF RIGHT TO SUE  
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CERTIFIED MAIL  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Ms. Betty Lee  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11066

Dear Ms. Lee:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
0922 9375

*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. Eric L. Daniels  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11034

Dear Mr. Daniels:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

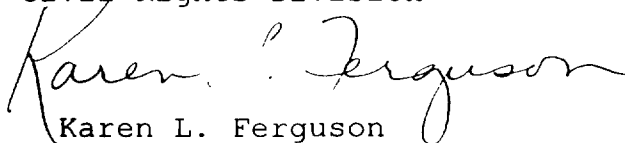
If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 29, 2001

Mr. David A. Ingram  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.

No. 151A11058

Dear Mr. Ingram:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.





U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

July 6, 2001

Ms. Lela M. Black  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson and Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11109

Dear Ms. Black:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

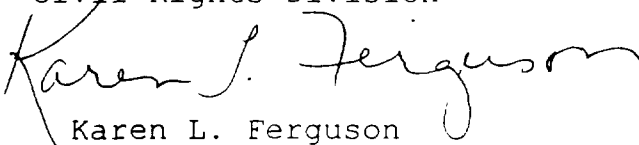
If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
0922 9382

*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Shon D. Thomas  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11097

Dear Ms. Thomas:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

**NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS**

CERTIFIED MAIL  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mr. Verdell Sutton  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11094

Dear Mr. Sutton:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Mildred Douglas  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11041

Dear Ms. Douglas:

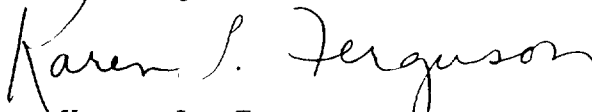
Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by   
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mr. Jerry Godfrey  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11044

Dear Mr. Godfrey:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Corrine Brown  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11021

Dear Ms. Brown:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mrs. Carolyn D. Alexander  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11014

Dear Mrs. Alexander:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mr. James H. Moultry  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11078

Dear Mr. Moultry:

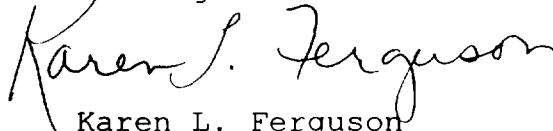
Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by   
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.





**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mrs. Jo Ann M. Williams  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11100

Dear Mrs. Williams:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968

June 27, 2001

Mr. James M. Smith  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11091

Dear Mr. Smith:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Derby Rollins  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11084

Dear Ms. Rollins:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Sandra O. Barnes  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11018

Dear Ms. Barnes:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mrs. Margaret C. Dilworth  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11112

Dear Mrs. Dilworth:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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WITHIN 90 DAYS

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Vicki L. Hendrix  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11053

Dear Ms. Hendrix:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Dritchess Clay  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11028

Dear Ms. Clay:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

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0922 9382

*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mrs. Shirley McMillian  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11074

Dear Mrs. McMillian:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.





**U.S. Department of Justice**

**Civil Rights Division**

**NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS**

CERTIFIED MAIL  
0922 9382

*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Virginia Jackson  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11114

Dear Ms. Jackson:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Pauline G. Burns  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11024

Dear Ms. Burns:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.


If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

  
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



**U.S. Department of Justice**

**Civil Rights Division**

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CERTIFIED MAIL  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Letheria A. Williams  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11102

Dear Ms. Williams:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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CERTIFIED MAIL  
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*Employment Litigation Section  
P.O. Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Suebrenna Jackson  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11060

Dear Ms. Jackson:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

A handwritten signature in cursive script that reads "Karen L. Ferguson".

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Mr. James Kennedy, Jr.  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11065

Dear Mr. Kennedy, Jr.:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.



U.S. Department of Justice

Civil Rights Division

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*Employment Litigation Section  
P O Box 65968  
Washington, DC 20035-5968*

June 27, 2001

Ms. Pearlie M. Dawkins  
c/o Ben R. Patterson, Esquire  
Law Offices of Patterson & Traynham  
Attorneys at Law  
P.O. Box 4289  
Tallahassee, FL 32315

Re: EEOC Charge Against State of Florida, Dept. of Children and Family  
Services, et al.  
No. 151A11037

Dear Ms. Dawkins:


Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

William R. Yeomans  
Acting Assistant Attorney General  
Civil Rights Division

by   
Karen L. Ferguson  
Civil Rights Analyst  
Employment Litigation Section

cc: Tampa Area Office, EEOC  
State of Florida, Dept. of Children and Family Services, et al.