


STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
DOCKET NUMBER: PJ09HE-63277

, on behalf of minor child,
COMPLAINANTS,
-VS-
SECAUCUS BOARD of EDUCATION,
RESPONDENT.

VERIFIED COMPLAINT

Received and Recorded
Date: August 24, 2012
Department of Law and Public Safety
Division on Civil rights
By: Agnes Roncaglio

1. The Complainant resides at:

31 Clinton Street
Newark NJ 07102
HUDSON COUNTY

2. To the best of Complainant's knowledge and belief, the Respondent is known as:

Secaucus Board of Education

and is located at:

20 Centre Avenue
Secaucus, NJ 07094
HUDSON COUNTY

3. The above named Respondent is hereby charged with unlawful **public accommodation discrimination** within the meaning of the New Jersey Law Against Discrimination (N.J.S.A. 10:5-1 et seq.) and specifically within the meaning of 10:5-4, 10:5-4.1, including but not limited to 10:5-12 (f), of said law because of race (), creed (), color(), national origin(), ancestry (), sex (), affectional or sexual orientation (), marital status (), physical or mental **disability (X)**, nationality (), or reprisal ().

4. PERSONAL HARM:

Complainant's daughter was differentially treated and denied access to a public accommodation based on her disability.

The charge is based on the following:

- a. Complainant's daughter is a person with a disability, in that, she has Cri Du Chat 5P minus Syndrome.
- b. Complainant stated that her daughter completed 8th grade at Respondent's Middle School in June 2012 and that Respondent informed her that her daughter will enter 9th grade in September 2012.
- c. Complainant alleges that Respondent never informed her about any school activities related to her graduation.
- d. Complainant alleges that as a result her daughter did not take part in the graduation ceremony, year book pictures, school sponsored dance and after party and was not awarded a diploma.

5. RESPONDENT'S REASON FOR ADVERSE ACTION:

Respondent provided no reason for discriminating against Complainant. When asked, Respondent stated that the building principal had a reason for excluding her daughter but could not recall what it was.

6. DISCRIMINATION STATEMENT:


Complainant alleges her daughter was discriminated against because of her disability.

7. Said acts of discrimination occurred in the County of Hudson in the State of New Jersey.

8. The Complainant requests whatever relief is provided by law including, but not limited to, compensatory damages for economic loss, humiliation, mental pain and suffering.

9. The Complainant has not instituted action in any court, either criminal or civil, regarding this matter.


COMPLAINANT

I, , of full age, hereby certifies that she is the Complainant herein; that she has read the foregoing Complaint and knows the content thereof; that to the best of her knowledge, information and belief, the facts alleged therein are true.


COMPLAINANT