



19951 TBD.C
'CHARGES OF DISCRIMINATION'

Unofficial Reporter

12/13/1999 - 12/19/1999

{MOST RECENT UPDATE: 1/3/2023}

E: TextBookDiscrimination@gmail.com

W: www.TextBookDiscrimination.com

visit TBD's [website](#) for the most up-to-date information

TABLE OF CONTENTS | 199951 TBD.C

ID	Caption	Page
001	<i>Castellanos v. SB Partners Real</i>	3
002	<i>Castellanos v. SB Partners Real</i>	9
003	<i>Singletery v. Photo Plus</i>	14
-	Appendix	16



199951 TBD.C 001
'CHARGES OF DISCRIMINATION'

CAPTION: *Castellanos v. SB Partners Real*

CITATION: 199951 TBD.C 001

DATE: 12/15/1999

STATE: FL

CASE NO: 20-90189H (FCHR)
00-004159 (DOAH)

CASE TYPE: Housing Discrimination

age	col	dis	fam	mar	nat	rac	rel	ret	sex	unk
		<input checked="" type="checkbox"/>								

FILENAME: 00004159100600i02.pdf

PAGES: 5



December 15, 1999

HOUSING DISCRIMINATION COMPLAINT

FILED
CO OCT -6 AM 9:06
DIVISION OF
ADMINISTRATIVE
HEARINGS

CASE NUMBER: 04-99-3370-8

1. Complainants

Gerald R. Castellanos
335 Woodlake Wynde, Box 12
Oldsmar, FL 34677

2. Other Aggrieved Persons

None.

3. The following is alleged to have occurred or is about to occur:

Discriminatory acts under Section 818 (coersion, Etc.).

4. The alleged violation occurred because of:

Handicap.

5. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

1424 Seagull Drive, #112
Palm Harbor, FL 34685

6. Respondent(s)

SB Partners Real Estate Corp.
Sentinel Real Estate, Inc.
C/O CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

7. The following is a brief and concise statement of the facts regarding the alleged violation:

I am disabled (mentally) within the meaning of the Fair Housing Act, as amended. I had problems paying my monthly rent and I requested that the property manager provide me an accommodation by allowing me to pay the rent late with late fees. Initially, I was told that it would not be a problem. I was told that the

management company works with individuals who are late with their payments. Instead, however, I was immediately evicted and denied an opportunity to remove my belongings on or about April 19, 1999. My insurance company determined that the removal of my property was in violation of the state law. I believe the property management company treated me differently than similarly situated residence because of my mental disability and my request for an accommodation

8. The most recent date on which the alleged discrimination occurred:

April 19, 1999.

9. Types of Federal Funds identified:

None.

10. The acts alleged in this complaint, if proven, may constitute a violation of the following:

Section 818 of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.

Gerald R. Castellanos

(Date)

N O T E : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

Gerardo R. Castellanos
P.O. Box 505
Tarpon Springs, FL 34688
(727) 938-3238

April 25, 2000

RECEIVED
00 APR 25 PM 1:58
CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA
FILED
00 OCT -6 AM 9:06
DIVISION OF
ADMINISTRATIVE
HEARINGS

I was fired from my position as the Assistant Tax Collector for Florida's fourth most populous county for advocating compliance with, and complying with The Consent Agreement dated December 10, 1980 between the U.S. Department of Justice, Civil Rights Division, Enforcement Section and Title VII of the Civil Rights Act of 1964 as amended.

Throughout my first year of employment I received substantial raises, outstanding evaluations and several letters of commendation from the Tax Collector, taxpayers, and fellow employees. However, in 1994 I spoke out after discovering several inconsistencies in the hiring, transfer, and promotion policies for minorities and older workers. I felt that these inconsistencies resulted in non-compliance with Title VII and The Consent Order. This discovery and my desire to remedy the problem did not endear me to those who had benefited from the inconsistent policies. In a county composed of almost 13 percent African Americans, our 212 employee operation did not have one single African-American male on its payroll. No African American had ever been appointed to a management position within the organization, in spite of the fact that some of them had worked there for over 20 years.

I made a recommendation to Mr. Petty the Tax Collector, that we take several steps to remedy this situation. Paramount to any other recommendation that I made, was that our Office begin immediate compliance with The Consent Order entered into between the Civil Rights Division of the United States Department of Justice on behalf various classes of employees, against Pinellas County. Employees of the Tax Collector were the only personnel unit within Pinellas County government, that were not a member of the System. There was no standardization in our hiring, promotion or evaluation policies. Each department and the Branch Offices were basically inconsistent and extremely subjective in all aspects of hiring and employment practices.

The Tax Collector kept delaying action on my recommendation to comply with the 1980 order and also to join The Unified Personnel System, which was set up as a compliance mechanism to remedy past discriminatory employment practices.

In spite of the fact that he had received 6 Equal Employment Opportunity Commission complaints within a four month period. However, on March 23, 1994, during a private meeting, he agreed that my recommendation might have some validity. He then assured me that he would allow his employees to enter the Unified System. At his request I met with Mr. Leon Russell, the county's Equal Employment Opportunity Officer on March 28, 1994, to explain the basis of my recommendation and to present data I had collected, as well as anecdotal evidence which in my opinion confirmed the presence of illegal, discriminatory practices. The next day on March 29, 1994, I stopped receiving memos and instructions from the Tax Collector. In addition, Mr. Petty called me into his office and suggested that I should consider voluntarily dropping my title as the Human Resource Officer of the Tax Collector's Office, as I was obviously "overworked." He also said that he "did not need a H.R.O. but rather an H.N.I.C. that would keep the black women in line". I later learned that the term H.N.I.C. is a Southern colloquialism for Head N---r In Charge. I now thought it necessary to follow the advice of my attorney and subsequently I filed a set of E.E.O.C. charges.

By March 31st, the Division Managers ceased reporting to me. When I made inquiries about this, the Tax Collector said that they would no longer report to me due to his planned reorganization of the Office. He told me that he had reconsidered his previous decision and now would deny our employee's entry into the Unified Personnel System. I was also told to resign as the Human Resource Officer, in order to clear the way for another candidate that he was now considering for the post, an African American male. I told him that I would be glad to resign from this responsibility, after our employees were enrolled into the Unified Personnel System, as he had promised.

On April 12, 1994, upon entering my office I was given a memorandum informing me that I was being placed on administrative leave with pay, while an inquiry into my management practices was conducted. The reason ostensibly given for this inquiry and suspension, was that several anonymous complaints about me had been received by the Tax Collector.

The afternoon of April 27, 1994 when our 11 year old son came home from school. he read a notice posted on the front door of our home, informing me that my appointment as Assistant Tax Collector had been revoked and that my employment was being terminated. because I had exhibited a poor management style. Our son panicked.

My attorney immediately asked for a hearing in order to determine what specific charges had been leveled against me, and what witnesses if any would be called to substantiate them. The request for a full procedural hearing was denied by Mr. Petty and the County Attorney's Office. Two sample lawsuits were then drafted for use in State and/or Federal Court. These drafts were presented to Mr. Petty, and the County Attorney's office; settlement discussions began immediately.

On November 22, 1994, I concluded discussions with the Chief Counsel and the Director of the Regional Office of the E.E.O.C. and agreed to drop my Charge # 151941071 upon payment of a \$100,000 award, attorney's fees, all costs, and the guarantee that the Tax Collector would start complying with Title VII and the 1980 consent order. The next day Mr. Petty announced that his Office would become a part of the Unified Personnel System by July 1, 1995.

I wish that my involvement in this 1994 E.E.O.C. Charge would have been ended on the day that a settlement agreement was signed. But unfortunately it turned out to be the beginning of a pattern of retaliation which has led to my permanent disability.

I do not wish to be facetious or disrespectful to The Court by using a contemporary cultural metaphor of sorts, but the best way that I know to express my journey over these last several years is best depicted in the movie "Philadelphia Story" in which actor Tom Hanks, was prevented from doing the work for which he was trained and the ability to be of some use to society.

Being deprived of meaningful work and the ability to care for oneself and one's family is a death sentence, no matter what illness one may have.

199951 TBD.C 002
'CHARGES OF DISCRIMINATION'

CAPTION: *Castellanos v. SB Partners Real*

CITATION: 199951 TBD.C 002

DATE: 12/15/1999

STATE: FL

CASE NO: 2001-1113 (FCHR)

01-001113 (DOAH)

CASE TYPE: Employment Discrimination

age	col	dis	fam	mar	nat	rac	rel	ret	sex	unk
		<input checked="" type="checkbox"/>								

FILENAME: 01001113100600i03.pdf

PAGES: 4



December 15, 1999

HOUSING DISCRIMINATION COMPLAINT

CASE NUMBER: 04-99-3370-8

FILED
CO OCT -8 AM 9:06

ADMINISTRATIVE
HEARINGS

01-1113

1. Complainants

Gerald R. Castellanos
335 Woodlake Wynde, Box 12
Oldsmar, FL 34677

2. Other Aggrieved Persons

None.

3. The following is alleged to have occurred or is about to occur:

Discriminatory acts under Section 818 (coersion, Etc.).

4. The alleged violation occurred because of:

Handicap.

5. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):

1424 Seagull Drive, #112
Palm Harbor, FL 34685

6. Respondent(s)

SB Partners Real Estate Corp.
Sentinel Real Estate, Inc.
C/O CT Corporation System
1200 S. Pine Island Road
Plantation, FL 33324

7. The following is a brief and concise statement of the facts regarding the alleged violation:

I am disabled (mentally) within the meaning of the Fair Housing Act, as amended. I had problems paying my monthly rent and I requested that the property manager provide me an accommodation by allowing me to pay the rent late with late fees. Initially, I was told that it would not be a problem. I was told that the

management company works with individuals who are late with their payments. Instead, however, I was immediately evicted and denied an opportunity to remove my belongings on or about April 19, 1999. My insurance company determined that the removal of my property was in violation of the state law. I believe the property management company treated me differently than similarly situated residence because of my mental disability and my request for an accommodation

8. The most recent date on which the alleged discrimination occurred:

April 19, 1999.

9. Types of Federal Funds identified:

None.

10. The acts alleged in this complaint, if proven, may constitute a violation of the following:

Section 818 of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.

Gerald R. Castellanos

(Date)

N O T E : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.

The Tax Collector kept delaying action on my recommendation to comply with the 1980 order and also to join The Unified Personnel System, which was set up as a compliance mechanism to remedy past discriminatory employment practices.

In spite of the fact that he had received 6 Equal Employment Opportunity Commission complaints within a four month period. However, on March 23, 1994, during a private meeting, he agreed that my recommendation might have some validity. He then assured me that he would allow his employees to enter the Unified System. At his request I met with Mr. Leon Russell, the county's Equal Employment Opportunity Officer on March 28, 1994, to explain the basis of my recommendation and to present data I had collected, as well as anecdotal evidence which in my opinion confirmed the presence of illegal, discriminatory practices. The next day on March 29, 1994, I stopped receiving memos and instructions from the Tax Collector. In addition, Mr. Petty called me into his office and suggested that I should consider voluntarily dropping my title as the Human Resource Officer of the Tax Collector's Office, as I was obviously "overworked." He also said that he "did not need a H.R.O. but rather an H.N.I.C. that would keep the black women in line". I later learned that the term H.N.I.C. is a Southern colloquialism for Head N---r In Charge. I now thought it necessary to follow the advice of my attorney and subsequently I filed a set of E.E.O.C. charges.

By March 31st, the Division Managers ceased reporting to me. When I made inquiries about this, the Tax Collector said that they would no longer report to me due to his planned reorganization of the Office. He told me that he had reconsidered his previous decision and now would deny our employee's entry into the Unified Personnel System. I was also told to resign as the Human Resource Officer, in order to clear the way for another candidate that he was now considering for the post, an African American male. I told him that I would be glad to resign from this responsibility, after our employees were enrolled into the Unified Personnel System, as he had promised.

On April 12, 1994, upon entering my office I was given a memorandum informing me that I was being placed on administrative leave with pay, while an inquiry into my management practices was conducted. The reason ostensibly given for this inquiry and suspension, was that several anonymous complaints about me had been received by the Tax Collector.

The afternoon of April 27, 1994 when our 11 year old son came home from school. he read a notice posted on the front door of our home, informing me that my appointment as Assistant Tax Collector had been revoked and that my employment was being terminated. because I had exhibited a poor management style. Our son panicked.

My attorney immediately asked for a hearing in order to determine what specific charges had been leveled against me, and what witnesses if any would be called to substantiate them. The request for a full procedural hearing was denied by Mr. Petty and the County Attorney's Office. Two sample lawsuits were then drafted for use in State and/or Federal Court. These drafts were presented to Mr. Petty, and the County Attorney's office; settlement discussions began immediately.

On November 22, 1994, I concluded discussions with the Chief Counsel and the Director of the Regional Office of the E.E.O.C. and agreed to drop my Charge # 151941071 upon payment of a \$100,000 award, attorney's fees, all costs, and the guarantee that the Tax Collector would start complying with Title VII and the 1980 consent order. The next day Mr. Petty announced that his Office would become a part of the Unified Personnel System by July 1, 1995.

I wish that my involvement in this 1994 E.E.O.C. Charge would have been ended on the day that a settlement agreement was signed. But unfortunately it turned out to be the beginning of a pattern of retaliation which has led to my permanent disability.

I do not wish to be facetious or disrespectful to The Court by using a contemporary cultural metaphor of sorts, but the best way that I know to express my journey over these last several years is best depicted in the movie "Philadelphia Story" in which actor Tom Hanks, was prevented from doing the work for which he was trained and the ability to be of some use to society.

Being deprived of meaningful work and the ability to care for oneself and one's family is a death sentence, no matter what illness one may have.

199951 TBD.C 003
'CHARGES OF DISCRIMINATION'

CAPTION: *Singletary v. Photo Plus*

CITATION: 199951 TBD.C 003

DATE: 12/17/1999

STATE: FL

CASE NO: 20-004545 (FCHR)
01-003846 (DOAH)

CASE TYPE: Employment Discrimination

age	col	dis	fam	mar	nat	rac	rel	ret	sex	unk
						☒		☒	☒	

FILENAME: 01003846100201i03124406.pdf

PAGES: 1



FLORIDA COMMISSION ON HUMAN RELATIONS

John Knox Road, Suite 240, Buildin
Tallahassee, Florida 32303-4149

① 1-3846

AMENDED CHARGE OF DISCRIMINATION

FCHR No. 2000454 J. Moran

Name (Indicate Mr., Ms., or Mrs.)
Angela Lorena Singletary

Social Security #
590-36-4455

Date of Birth
1/11/71

Street Address
2634 Cotuit Lane

Home Telephone Number (area code)
850/894-8056

City, State, and Zip Code
Tallahassee, FL 32308

Work (if possible to call you there)

List the employer, labor organization, employment agency, apprenticeship committee, government agency, or other person who discriminated against you.

Name
Photo Plus

No. of Employees
15+

Telephone No. (area code)
850/681-0688

Street Address * 1815-8
~~1815-B~~ Thomasville Road

City, State, and Zip Code
Tallahassee, FL 32303

County
Leon

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box (es))
 RACE COLOR SEX RELIGION DISABILITY
 NATIONAL ORIGIN AGE MARITAL STATUS RETALIATION

DATE MOST RECENT OR CONTINUING
DISCRIMINATION TOOK PLACE
(month, day, year) 11/5/99

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s):

I. Personal Harm:

On November 5, 1999 I was terminated from my position as a Lab Manager.

II. Respondent's Reason for Personal Harm:

No reason was given for the harassment and discrimination.

III. Discrimination Statement:

I believe I have been discriminated against because of my Race - White, Sex - Female, and Retaliation, which is in violation of Chapter 760 of the Florida Civil Rights Act as amended for the following reasons:

1. During my employment with Respondent I was subjected to unwanted physical and verbal sexual harassment by the Store Manager, Bill Lax. He asked me to sleep with him on several occasions, among other things. He has admitted to being "in love" with me, and was very upset to learn that I was dating a co-worker.
2. I have heard Mr. Lax comment that a Darkroom Technician, Malcolm Harkness should be fired due to repeated customer complaints, but he could not do so since Mr. Harkness is Black. Yet I was fired for no legitimate reason, other than the fact that I turned down Mr. Lax's frequent inappropriate requests.
3. I filed a complaint against Mr. Lax on November 3, and was fired two days later.

I REQUEST TO BE AFFORDED FULL RELIEF TO WHICH I AM ENTITLED TO UNDER THE LAW(S).

FILED
 DIVISION OF
 ADMINISTRATIVE
 SERVICES
 OCT - 2 AM 8:47
 TALLAHASSEE, FL

I will advise the agency if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

Under penalties of perjury, I declare that I have read the foregoing charge of discrimination and that the facts stated in it are true.

SIGNATURE OF COMPLAINANT

DATE

Angela L Singletary

12/17/1999

APPENDIX



COPYRIGHT NOTICE

TextBookDiscrimination.com is not the author of these public documents. Instead, TextBookDiscrimination.com merely re-printed and reformatted them for easier use.

ORIGINAL SOURCE

<u>#</u>	<u>Item</u>	<u>Link</u>
1	Original Source	FCHR.MyFlorida.com
2	Secondary Source	DOAH.State.FL.US

INTERACTIVE VERSION

<u>#</u>	<u>Item</u>	<u>Link</u>
1	Web	TextBookDiscrimination.com/Reports/COD/

CONTACT INFORMATION

E: TextBookDiscrimination@gmail.com

W: www.TextBookDiscrimination.com

Congratulations! You're now **booked up** on these '*Charges of Discrimination*' that are pertinent to civil rights litigation!

