WRITING SAMPLE: FICTITIOUS MATTER. Prepared by Dwight Bernard as a writing sample. All names, entities, and facts are invented; no client, case, or court filing is involved.

CHARGE OF DISCRIMINATION

U.S. Equal Employment Opportunity Commission
and New York State Division of Human Rights (dual-filed)

Charging Party	Jordan Ellison, [address and telephone withheld in sample]
Respondent	Kestrel Point Freight Services, Inc. 41-20 Vernon Boulevard, Long Island City, NY 11101
Number of employees	More than 200 (on information and belief)
Discrimination based on	Sex (pregnancy); Retaliation; Failure to accommodate pregnancy-related limitations
Date(s) discrimination took place	Earliest: February 19, 2026 Latest: March 20, 2026
Continuing action	No

THE PARTICULARS ARE:

I. EMPLOYMENT AND PROTECTED STATUS

1. Respondent Kestrel Point Freight Services, Inc. ("Kestrel Point") operates a freight dispatch and warehousing facility at 41-20 Vernon Boulevard, Long Island City, New York 11101. On information and belief, it employs more than 200 people. Its own website describes "over 250 team members across three New York locations."

2. I was hired on March 4, 2024 as a Dispatch Coordinator and was promoted to Senior Dispatcher on January 6, 2025. My only performance review, dated December 12, 2025, rated me "Exceeds Expectations." Before March 2026 I had never received any discipline.

3. I am a woman. In February 2026 I was pregnant.

II. ACCOMMODATION REQUEST AND DENIAL

4. On February 10, 2026, I told my supervisor, Operations Manager Kevin Marsh, that I was pregnant.

5. On February 17, 2026, I emailed Human Resources Manager Dana Whitcomb a note from my obstetrician. It asked that, for the remainder of my pregnancy, I (a) not lift more than 20 pounds; (b) be allowed to sit while working at the dispatch console; and (c) take two additional ten-minute breaks per shift. Lifting is not part of the Senior Dispatcher job description posted on Respondent's website, and the dispatch console has a chair.

6. On February 19, 2026, Mr. Kevin Marsh told me in the dispatch office, in front of a coworker: "Dispatch isn't a desk job for someone who's expecting. Maybe you should think about whether this is the right place for you right now."

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7. On February 20, 2026, Ms. Dana Whitcomb replied by email that "the only available accommodation is unpaid leave." No one asked me about my restrictions, discussed alternatives, or explained why sitting or short breaks could not be allowed.

III. MY COMPLAINT AND WHAT FOLLOWED

8. On February 24, 2026, I emailed Ms. Dana Whitcomb and complained that Mr. Kevin Marsh's comment and the denial of my request were pregnancy discrimination. I asked again for the three accommodations my doctor had requested.

9. I received no response to that email.

10. On March 6, 2026, ten days after my complaint, Mr. Kevin Marsh issued me a first written warning for "attendance." The only absence it cited was a prenatal appointment on March 2, 2026, which I had scheduled through Respondent's leave system and which had been approved.

11. On March 20, 2026, Ms. Dana Whitcomb and Mr. Kevin Marsh terminated my employment. They told me my position had been eliminated in a "restructuring."

12. On April 13, 2026, Respondent posted an opening for a "Senior Dispatcher" at the Long Island City facility on its own careers page. The posted duties were the same as mine. I saved a copy of the posting that day.

IV. CHARGE

13. I believe Respondent discriminated against me because of my sex (pregnancy). It failed to reasonably accommodate my known pregnancy-related limitations, and it disciplined and terminated me because I requested accommodation and complained of discrimination. This violates Title VII of the Civil Rights Act of 1964, as amended by the Pregnancy Discrimination Act; the Pregnant Workers Fairness Act; the New York State Human Rights Law; and the New York City Human Rights Law.

14. I want this charge filed with both the EEOC and the New York State Division of Human Rights.

I declare under penalty of perjury that the above is true and correct.

Date: April 30, 2026

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Charging Party Signature

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