

3. Plaintiff timely filed charges of discrimination with the Equal Employment Opportunity Commission on October 23, 2014 and on December 10, 2014. She received her Right to Sue letter on August 11, 2015.
4. Venue is proper in the South Bend Division because the Defendant resides in this division and the events complained of occurred in this division.

Parties

5. Joy Phillips (female) is an adult citizen of the United States who resides in South Bend, Indiana.
6. The City of South Bend is a government unit located in St. Joseph County, Indiana. It operates the South Bend Police Department.
7. Ronald Teachman (male), is an adult citizen of the United States who resides in South Bend, Indiana. He is sued individually and in his capacity as Chief of the South Bend Police Department.

Facts

8. Joy Phillips ("Phillips") has been employed by the South Bend Police Department ("SBPD") as a sworn police officer since April 19, 1999.
9. During this time Phillips performed exemplary police work, receiving numerous commendations.
10. On three instances Phillips sought promotion from the rank of Patrolman to Sergeant.