

RETURN DATE: DECEMBER 19, 2017

NOEMI SOTO

STATE OF CONNCETICUT

VS.

SUPERIOR COURT

CHRISTIANS ALLIANCE,

JUDICIAL DISTRICT OF MIDDLESEX

CARE4ONE, INC.,

AT MIDDLETOWN

DAVID RUSSO

NOVEMBER 22, 2017

COMPLAINT

1. On September 17, 2017, I, the Plaintiff, was researching online at Nutmeg TV's on Demand in preparation for a scheduled interview of my own the next day. I see an interview done on "House of Virtuous Women" where a "Glen Russo" from Christians Alliance was being interviewed and presenting their "Save them Both Program."

2. Immediately upon hearing the details of the program and their need for speakers I knew beyond a shadow of a doubt that this was a divine opportunity for me. Within the next few days, I researched their entire website, secured car insurance to have unhindered access to rental cars, secured a pastoral and client reference, Completed Christians Alliance online application with attached resume, and followed

up with a phone call expressing my joyful interest in their speaker position and confirming that my recent application was received.

3. On Thursday, Sep. 28, 2017, I gave Christians Alliance another call to affirm my interest in the position. On Sep. 29, 2017, I received a call and was scheduled for an interview at Christians Alliance on Tuesday, Oct. 3, 2017.

4. On Oct. 3rd, I arrived on-time to my interview, in a rental car equipped with my speaker bio, copies of my resume, references, and personal ministry information.

5. I was interviewed by David Russo and Kyle Michel. During the interview it was explained that they were not the deciding factor in my employment, but that they report their findings to a "Board" who then decides whether or not I get the job.

6. Conflicts arose when I emphasized that I was available to them every weekend. David would rebuff with persistent clarity that they would not require me to work "every weekend" because of how important it is for me to "fellowship with a home church regularly". I would immediately reply that my fellowship day of preference is on Wednesday night Bible and prayer meetings so being available every weekend is no personal conflict. David would reply emphasizing that the most I should expect to work IF I get hired is 2 weekends a month and I would then re-emphasize that "truly this is an opportunity I am delighted to do and that I have no problem or conflicts making myself available EVERY weekend". Throughout the interview this rhetoric was repeated at least 3 times in various angles.

7. Another conflict arose when I was questioned regarding my non-church affiliation and personal ministry. I lead BG2G, a CT registered Religious Corporation, but I fellowship with various Christian denominations from Baptist, Pentecostal, Assembly of God, Seventh Day Adventist, and various Non-Denominational and Independent churches. I assured them that I am very well known as a devote Christian should they need more references.

8. For most of 2017 I have primarily been fellowshipping at Tabernacle Baptist Church. During the interview I was asked to fill out some forms one of which had a space for "Church _____" to be filled out.

9. Having openly disclosed my unique circumstances, throughout the entire interview, I looked to both David and Kyle for guidance in how to respond by asking them "What do I put in after 'Church', BG2G or Tabernacle Baptist Church?" immediately and Without any hesitation Kyle responds "Baptist Church" and following with equal reaction and no hesitation, David looks to Kyle and states "Good Call!".

10. Being personally indifferent to either response I conceded to their advice believing that their response was in good-faith gesture to enhance my chances of being approved by "the board".

11. In total my interview was about an hour and 15min, I had an honest confident and qualifying response to every question they asked, even when asked to disclose information about my disability; everyone was seemingly optimistic. I was

told that I would get a response for employment in 2 weeks and that was standard procedure.

12. On Oct. 17, 2017, exactly 2 weeks from the date of my interview, I received a message from David Russo stating that “my employment was denied”. I gave David Russo a call back and asked him personally, why I was denied and his response was that after 2 weeks of praying and seeking God’s will, he felt it was not God’s will for them to hire me and that they reserve the right to choose or deny employment on anyone”.

13. I asked David what “denomination are the board members?” and he gave a long-winded staggering response claiming that they were all “Non-Denominational”.

14. I have exhaustive insight to the doctrines that divide Christian denominations. The preceding scenario, would be understood and for some Christians even valid IF, for example, I were to have sought employment at “Baptist Alliance” (this is a fictitious name), because traditional Baptist doctrine includes very strong bias sentiments against women in position of authority, of which I am a woman in a position of great authority, in respect to my role with BG2G.

15. But with all due respect to the Baptist dogma, I did not seek employment at Baptist Alliance, I sought employment at “Christians Alliance” and my position of authority with BG2G would not be a problem with other renowned Christian Denominations and Non-Denominational Christian Churches in general.

16. The Save them Both Program being promoted by Christians Alliance and Care4One, Inc is in my opinion a true representation of Christian goals and values BUT the bias application of doctrinal beliefs, exclusive to only some Christian dogmas cannot be lawfully applied to employment sought at an All-inclusive Christian Employer.

17. Despite being informed during my interview that my employment decision will be decided by a "Board", I include David Russo as a defendant in this lawsuit because during our last conversation, when I asked him Why I was denied employment, he assumed responsibility for the decision, claiming that the result of my denial of employment was due to his final conviction that he received through prayerful consideration.

WHEREFORE, the Plaintiff prays for the following relief:

1. Punitive damages for Disparate-Treatment, and
2. Such other relief as the Court deems fair, just and equitable.

Signed: 

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