EEOC Form 5 (2025)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:	Agency(ies) Charge No(s):
EEOC	

Texas Workforce Commission Civil Rights Division and EEOC

State or local Agency, if any

Name *(indicate Mr., Ms., Mrs., Miss, Dr., Hon., Rev., etc.)*	Home Phone	Year of Birth
Linda Gyimah-Dorsey	[redacted]	[redacted]

Street Address, City State and ZIP Code

[redacted]

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (*If more than two, list under PARTICULARS below.*)

Name	No. Employees, Members	Phone No.
T-Mobile USA, Inc.	70,000+	[redacted]

Street Address, City State and ZIP Code

[redacted]

Name	No. Employees, Members	Phone No.

Street Address, City, State and ZIP Code

DISCRIMINATION BASED ON	DATE(S) DISCRIMINATION TOOK PLACE Earliest	Latest
Religion	4/16/2026	10/6/2026

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

See attached Statement in Support

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

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

11/19/26 x [signature]

Date *Charging Party Signature*

NOTARY – *When necessary for State and Local Agency Requirements*

Julia Voyles

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

x [signature]

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE *(month, day, year)*

Julia Voyles 11/19/2026

JULIA VOYLES
My Notary ID # 132171521
Expires September 13, 2027

Religious Beliefs & Background

I have been an employee at T-Mobile for the past thirteen years and a retail store manager at a Dallas, TX location. I am a lifelong follower of Jesus Christ, and my faith informs every aspect of my life. As a Christian, I observe the Sabbath each Sunday to attend church, participate in Bible studies, and refrain from work in accordance with Scripture.

My Employer's Discrimination Against My Religious Beliefs

I have worked for T-Mobile since 2013. My first year with the company was in Parkview, Maryland, where I worked as an authorized retailer. In 2014, I transitioned to T-Mobile corporate and worked at the Lakeforest mall location in Gaithersburg, Maryland. Later in 2016, I moved to a location in Georgia where I moved up in the company to a mobile expert, then retail associate manager. From there, I transitioned back to a T-Mobile location in Macon, Georgia, then to a Douglasville, Georgia location in 2018, another Maryland location in 2023 where I was promoted to retail store manager, and most recently to my current Dallas, TX location in July 2024. I was always transparent with my Sunday Sabbath observance when I transferred locations.

I first submitted an official request for religious accommodation in early 2019. My store and district managers asked that I document my already-honored accommodation of Sunday Sabbath observance on paper via T-Mobile's Broadspire and ZenDesk platforms in use at the time. They requested that I include a letter from my pastor. I submitted all necessary documents for the accommodation request, and T-Mobile officially approved. I then submitted a second request for religious accommodation from taking the Covid-19 vaccination in 2022. T-Mobile approved this request as well.

Until March of this year, my religious observance and request for accommodation have never been an issue. When I returned in February of this year from 4 months of leave of absence, my district manager and market director began to take issue with my longstanding practice of not working on Sundays and communicated that all managers were required to work on Sundays, at least one Sunday per month. They also claim to have lost my initial request for religious accommodation submitted via Broadspire and ZenDesk which the company ultimately approved.

On or about March 27, 2026, I officially submitted a new request for religious accommodation, at my managers' direction. On or about April 16, 2026, I received a response that the company was willing to "accommodate" me but with only three Sundays a month according to the company "guideline" that all retail store leaders must work a minimum of one Sunday per month, which means they would not depart from company policy in any way. I then received a second response, three days after the first response, indicating that T-Mobile had decided to deny my request based on needs of the business. Following this determination, my district manager, [redacted] communicated that he would speak with HR and his higher ups.

Occasionally, I have needed to attend work meetings and complete work on Sundays, and I resubmitted my accommodation request again on or about September 5, 2026, by email to my market director, [redacted] Mr. [redacted] indicated that my request would be further considered, but T-Mobile management has simply ignored it for months, and the matter currently remains unresolved. Mr. [redacted] also communicated on or about October 6, 2026, in a meeting with myself and Mr. [redacted] that the next time my request comes to him, he will deny it. In a follow up email sent on or about October 14, 2026, to recap the October 6 conversation, Mr. [redacted] stated that my "currently approved accommodation of three Sundays per month will remain in effect while LOA reassesses the available options," and that "no changes will be made until the review is complete and a determination is communicated." "LOA" refers to Broadspire which took no action with respect to my request for accommodation. This confirmation of accommodating with only three Sundays a month, as well as the eight months of shuffling my request among managers and failure to provide any final decision since I first requested accommodation in March 2026, were a failure to accommodate my religious practice of observing a Sabbath rest on Sundays.

Beyond [redacted] and [redacted], I have had no communication with an HR representative regarding this matter. There is also no religious accommodation department or coordinator that I am aware of, and it was communicated to me that HR left my matter in the hands of my district manager as a matter of his discretion.

No one at T-Mobile has shown that my ability to meet deadlines without Sunday work poses any undue hardship on T-Mobile, yet it still fails to provide an accommodation of my religious observance. I have worked at T-Mobile for a total of thirteen years without working a Sunday shift, and I have worked as a retail store manager for three years absent working Sunday shifts as well. Even so, the stores I have managed have performed over the last three years, with no shortage of managerial coverage on Sundays. In fact, over the last six months, my store has performed in the top 25 percent in the nation. Yet my district manager has informed me that I must work one Sunday per month despite my Sabbath observance. Mr. [redacted] told me that if I did not want to work on Sundays, I should find another job. I understand that if I do not work one Sunday per month, I will be subject to formal discipline as well as potential loss of merit-based pay or promotion opportunities. As a result, I believe that T-Mobile is discriminating against me based on my sincerely held religious beliefs and practices in violation of Title VII of the Civil Rights Act.

INTAKE QUESTIONNAIRE

Please immediately complete this entire form and return it to the U.S. Equal Employment Opportunity Commission ("EEOC"). **REMEMBER**, a charge of employment discrimination must be filed within the time limits imposed by law, within 180 days or in some places within 300 days of the alleged discrimination. When we receive this form, we will review it to determine EEOC coverage. **Answer all questions completely, and attach additional pages if needed to complete your responses. If you do not know the answer to a question, answer by stating "not known." If a question is not applicable, write "N/A." (PLEASE PRINT)**

1. Personal Information

Last Name: Gyimah-Dorsey First Name: Linda MI:

Street or Mailing Address: [redacted] City: [redacted] County: [redacted]
State: TX

Zip: [redacted]

Phone Numbers: Home: [redacted]

Work: (_) ____ Cell: (__) ____

Email Address: [redacted]

Date of Birth: [redacted] Sex: Female Do You Have a Disability? No

Please answer each of the next three questions. i. Are you Hispanic or Latino? No ii.

What is your Race? Please choose all that apply. African American iii. What is your National Origin

(country of origin or ancestry)? United States of America

Please Provide The Name Of A Person We Can Contact If We Are Unable To Reach You:
Name: Cliff Martin Relationship: Attorney
Address: [redacted] City: Plano State: TX Zip
Code: 75075 Office Phone: [redacted] Other Phone: (_) _____

2. I believe that I was discriminated against by the following organization(s): (Check those that apply)
Employer
Organization Contact Information (If the organization is an employer, provide the address where you actually worked. If you work from home, check here and provide the address of the office to which you reported.) **If more than one employer is involved, attach additional sheets.**

Organization Name: T-Mobile USA, Inc.
Address: [redacted] County: Dallas County City: Dallas State: TX Zip: [redacted] Phone: [redacted]

Type of Business: Cell Service Provider Job Location if different from Org. Address: _____

Human Resources Director or Owner Name: [redacted] Phone: ___Email:_____

Number of Employees in the Organization at All Locations: Please Check (√) One
Fewer Than 15 15 – 100 101 – 200 201 – 500 70,000+

3. Your Employment Data (Complete as many items as you are able.) **Are you a federal employee?** No

Date Hired: 04/2024 Job Title At Hire: Authorized Retailer– Maryland location

Pay Rate When Hired: _____Last or Current Pay Rate: [redacted]

Job Title at Time of Alleged Discrimination: Retail Store Manager – Dallas location

Date Quit/Discharged: n/a Name and Title of Immediate Supervisor: [redacted]

(District Manager)

If Job Applicant, Date You Applied for Job: ____ Job Title Applied For:

_____

4. What is the reason (basis) for your claim of employment discrimination?

FOR EXAMPLE, if you feel that you were treated worse than someone else because of race, you should check the box next to Race. *If you feel you were treated worse for several reasons, such as your sex, religion and national origin, you should check all that apply. If you complained about discrimination, participated in someone else's complaint, or filed a charge of discrimination, and a negative action was threatened or taken, you should check the box next to* Retaliation.

Religion

If you checked color, religion or national origin, please specify: Christian

If you checked genetic information, how did the employer obtain the genetic information?

Other reason (basis) for discrimination (Explain): _____

5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name(s) and title(s) of the person(s) who you believe discriminated against you. **Please attach additional pages if needed.**

(Example: 10/02/06 – Discharged by Mr. John Soto, Production Supervisor)

A. **Date**: October 6, 2026 **Action**: Religious discrimination, including failure to accommodate my longstanding practice of Sabbath observance on Sundays in violation of Title VII of the Civil Rights Act. Please see attached Charge and Statement in Support.

Name and Title of Person(s) Responsible: [redacted] and [redacted]

B. **Date**: _____ **Action**: **Name and Title of Person(s) Responsible**

_____

6. Why do you believe these actions were discriminatory? Please attach additional pages if needed.

T-Mobile refuses to accommodate my religious practice of Sabbath observance. I have worked at T-Mobile for thirteen years without working on Sundays, but T-Mobile has rejected my accommodation request. See attached Charge and Statement in Support.

7. What reason(s) were given to you for the acts you consider discriminatory? By whom? His or Her Job Title

I have been told that managers must work one Sunday per month according to the company "guideline," however my store has successfully operated for the past three years while I have been the manager absent work on Sundays. See attached Charge and Statement in Support.

8. Describe who was in the same or similar situation as you and how they were treated. For example, who else applied for the same job you did, who else had the same attendance record, or who else had the same performance? Provide the race, sex, age, national origin, religion, or disability of these individuals, if known, and if it relates to your claim of discrimination. For example, if your complaint alleges race discrimination, provide the race of each person; if it alleges sex discrimination, provide the sex of each person; and so on. Use additional sheets if needed.

Of the persons in the same or similar situation as you, who was treated *better* than you?
Full Name Race, Sex, Age, National Origin, Religion or Disability Job Title Description of Treatment

A._____**B.**_____

Of the persons in the same or similar situation as you, who was treated *worse* than you?
Full Name Race, Sex, Age, National Origin, Religion or Disability Job Title Description of Treatment

A._____**B.**_____

Of the persons in the same or similar situation as you, who was treated the *same* as you?
Full Name Race, Sex, Age, National Origin, Religion or Disability Job Title Description of Treatment

A._____**B.**_____

Answer questions 9-12 only if you are claiming discrimination based on disability. If not, skip to question 13. Please tell us if you have more than one disability. Please add additional pages if needed.

9. Please check all that apply:

10. What is the disability that you believe is the reason for the adverse action taken against you? Does this disability prevent or limit you from doing anything? (e.g., lifting, sleeping, breathing, walking, caring for yourself, working, etc.).

_____

11. Do you use medications, medical equipment or anything else to lessen or eliminate the symptoms of your disability?

Yes No
If "Yes," what medication, medical equipment or other assistance do you use?

_____

12. Did you ask your employer for any changes or assistance to do your job because of your disability?

Yes No
If "Yes," when did you ask? _____ How did you ask (verbally or in writing)?
_____ Who did you ask? (Provide full name and job title of person) _____

Describe the changes or assistance that you asked for**:**

_____
How did your employer respond to your request?

_____

13. Are there any witnesses to the alleged discriminatory incidents? If yes, please identify them below and tell us what they will say. (Please attach additional pages if needed to complete your response)

Full Name Job Title Address & Phone Number What do you believe this person will tell us?

A. [redacted]

14. Have you filed a charge previously on this matter with the EEOC or another agency? No

15. If you filed a complaint with another agency, provide the name of agency and the date of filing:

_____

16. Have you sought help about this situation from a union, an attorney, or any other source? Yes
Provide name of organization, name of person you spoke with and date of contact. Results, if any?

Cliff Martin and Madison Krause of First Liberty Institute.

Please check one of the boxes below to tell us what you would like us to do with the information you are providing on this questionnaire. If you would like to file a charge of job discrimination, you must do so either within 180 days from the day you knew about the discrimination, or within 300 days from the day you knew about the discrimination if the employer is located in a place where a state or local government agency enforces laws similar to the EEOC's laws. **If you do not file a charge of discrimination within the time limits, you will lose your rights. If you would like more information before filing a charge or you have concerns about EEOC's notifying the employer, union, or employment agency about your charge, you may wish to check Box 1. If you want to file a charge, you should check Box 2.**

BOX 2 I want to file a charge of discrimination, and I authorize the EEOC to look into the discrimination I described above. I understand that **the EEOC must give the employer, union, or employment agency that I accuse of discrimination information about the charge, including my name.** I also understand that the EEOC can only accept charges of job discrimination based on race, color, religion, sex, national origin, disability, age, genetic information, or retaliation for opposing discrimination.

Signature **Today's Date**

11/19/20

PRIVACY ACT STATEMENT: This form is covered by the Privacy Act of 1974: Public Law 93-579. Authority for requesting personal data and the uses thereof are:

1) FORM NUMBER/TITLE/DATE. EEOC Intake Questionnaire (9/20/08). **2) AUTHORITY.** 42 U.S.C. § 2000e-5(b), 29 U.S.C. § 211, 29 U.S.C. § 626. 42 U.S.C. 12117(a)

3) PRINCIPAL PURPOSE. The purpose of this questionnaire is to solicit information about claims of employment discrimination, determine whether the EEOC has jurisdiction over those claims, and provide charge filing counseling, as appropriate. Consistent with 29 CFR 1601.12(b) and 29 CFR 1626.8(c), this questionnaire may serve as a charge if it meets the elements of a charge. **4) ROUTINE USES.** EEOC may disclose information from this form to other state, local and federal agencies as appropriate or necessary to carry out the Commission's functions, or if EEOC becomes aware of a civil or criminal law violation. EEOC may also disclose information to respondents in litigation, to congressional offices in response to inquiries from parties to the charge, to disciplinary committees investigating complaints against attorneys representing the parties to the charge, or to federal agencies inquiring about hiring or security clearance matters. **5) WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL FOR NOT PROVIDING INFORMATION.** Providing this information is voluntary but the failure to do so may hamper the Commission's investigation of a charge. It is not mandatory that this form be used to provide the requested information.