

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

AFFIDAVIT OF DISCRIMINATORY EMPLOYMENT PRACTICE

THIS SECTION TO BE FILLED OUT BY CHRO STAFF

Case No. «CHRO No» Date: «Date Filed»
EEOC No. «EEOC No»

My name is: Pinnacle Maintenance LLC
My mailing address is: 5 Pinnacle Rd., Farmington CT 06032
My telephone number is: 860-284-8975
My email address is: pinnaclemaintenance@comcast.net
The Respondent is: Haynes Construction Company
Whose business address is: 32 Progress Avenue, Seymour CT 06483

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Adverse actions alleged:

☐ Terminated	☐ Harassed	☐ Not hired
☐ Demoted	☐ Denied leave	☐ Not promoted
☐ Suspended	☐ Constructive discharge	☐ Not recalled
☐ Denied Raise	☐ Retaliated against	☐ Unequal Pay
☐ Denied reasonable accommodation - disability		
☐ Denied reasonable accommodation - pregnancy		
☐ Denied reasonable accommodation - religion		
☒ Other: Prompt payment violation		

Date of most recent alleged adverse action: April, 2026

☒ Ongoing?

Address where most recent alleged adverse action occurred: 5 Pinnacle Rd., Farmington CT 06032

Protected classes alleged:

☐ Race	☐ Sex	☐ Age
☐ Color	☐ Sexual Orientation	☐ Mental Disability
☐ National Origin	☐ Pregnancy/Breastfeeding	☐ Physical Disability
☐ Ancestry	☐ Marital Status	☐ Intellectual Disability
☐ Religion/Creed	☐ Veteran Status	☐ Learning Disability
☐ Criminal Conviction	☐ Genetic Information	☐ Gender Identity/Expression
☐ Erased Criminal History Record	☐ Status as Victim of Domestic Violence	
☐ Status as Victim of Sexual Assault	☐ Status as Victim of Trafficking in Persons	
☐ Previous Opposition to Discrimination / engaged in protected activity		

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☒	Other: Subcontractor on a state-funded public works contract
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The Respondent is alleged to have violated:

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| ☐ CONN. GEN. STAT. § 46a-60
☐ CONN. GEN. STAT. § 46a-60(b)(4) (retaliation)
☐ CONN. GEN. STAT. § 46a-60(b)(5) (aiding and abetting)
☒ Other: CONN. GEN. STAT. § 49-41c | ☐ CONN. GEN. STAT. §§ 46a-70 – 78
☐ CONN. GEN. STAT. § 46a-80
☐ CONN. GEN. STAT. § 46a-81b – 81n (sexual orientation) |
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The Respondent is alleged to have violated CONN. GEN. STAT. § 46a-58(a) based on deprivations of rights secured under:

- | | |
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| ☐
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☐ | Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2 (cite for 15 or more individuals employed)
Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634 (cite for 20 or more individuals employed)
Americans with Disabilities Act, 42 U.S.C. § 12101 et seq.
Section 504 of the Rehabilitation Act of 1973
Equal Pay Act of 1964, U.S.C. § 206
Other: |
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I provide the following details:

1. The Respondent is Haynes Construction Company, whose principal place of business is 32 Progress Avenue, Seymour, CT 06483.
2. The Respondent employs at least 15 persons.
3. The protected class relevant to this complaint is that Pinnacle Maintenance LLC is a subcontractor on a state-funded public works contract .
4. My name is Normando Moquete Jr. and I am the owner of Pinnacle Maintenance LLC. I am authorized to initiate this complaint on behalf of Pinnacle Maintenance LLC.
5. The Respondent was selected as the General Contractor for project #23-0040-NHAI located at 127 Martin St., Hartford, CT 06120. The project is for the rehabilitation of residential housing units.
6. The total contract value of the project is \$1,588,006.00.
7. State funds are used on this project from the Connecticut Department of Housing and the Connecticut Housing Finance Authority.
8. There is additional municipal funding from the City of Hartford for the project.
9. Pinnacle Maintenance contracted with the Respondent as a subcontractor for this project on April 14, 2025, with the full agreement executed on April 25, 2025.
10. Pinnacle Maintenance has been working on the project consistently throughout the project's duration. The project is currently ongoing with work still being completed.
11. Pinnacle Maintenance is required to be paid on a monthly basis for the work performed. AIA Contract Requisition forms known are submitted on the 15th of the month and are to be paid thereafter.
12. The last payment Pinnacle Maintenance has received from the Respondent was on March 5, 2026 for work performed in December, 2025.
13. As of the date of the filing of this complaint, it has been longer than fifteen days that payment from the Respondent has been due.
14. Timely payments have been an issue throughout the project, leading to a lien being placed on the project in July 2025.
15. Upon information and belief, the Respondent has received their state-funded payments throughout the contract for work performed.
16. The Respondent has not provided written notice for withholding payments for any bona fide reason.
17. Upon information and belief, both the City of Hartford and the Department of Housing are aware of payment issues on the project.
18. Upon information and belief, other subcontractors working on the project have not been paid in a timely manner, if at all.
19. Breach of contract scope of work line 8.18 of Haynes contract. Pinnacle Maintenance was told by Haynes to purchase said materials (toilets, bath accessories, medicine cabinets and postal mailboxes. Pinnacle needs to be reimbursed for said items purchased by Pinnacle Maintenance. In addition, breach of contract scope of work line 8.69 all plumbing fixtures to be provided by Haynes. However, Pinnacle was told to purchase all plumbing fixtures and is owed that money.

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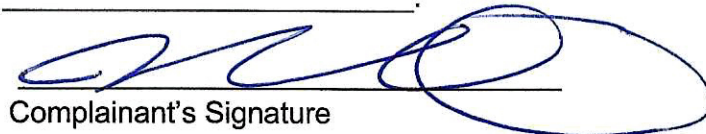
20. Pinnacle was not paid for change orders outside of scope of work. For example the complete redesigned 5 ADA units bathrooms, laundry, and bedrooms rough plumbing, drywall new walls. Including demolition of existing walls.
21. Nonpayment for change order to install 94 closet doors that were wrong size and opening not designed for closet doors.

I therefore believe that Pinnacle Maintenance LLC has been denied prompt payment on a state-funded contract by the Respondent).

I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint, secure for me my rights as guaranteed to me under the above-cited laws, and secure for me any remedy to which I may be entitled.

I Normando Moquete being duly sworn, on oath, state that I am the Complainant herein; that I have read the foregoing complaint and know the content thereof; that the same is true of my own knowledge, except as to the matter herein stated on information and belief, and that as to these matters I believe the same to be true.

Dated in _____ on this _____.


Complainant's Signature

Subscribed and sworn before me on 04/15/2026.
Date



Notary Public/Commissioner of the Superior Court
10-31-2030

Notary Public Expiration/Juris Number



BENJAMIN PARZYCH
NOTARY PUBLIC
STATE OF CONNECTICUT
MY COMM. EXP. 10-31-2030

