

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

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In the Matter of the Complaint of:

Verified Complaint

DANIELLE HAZEL,

Case No.

Complainant,

-against-

ROBIN FLEMING, an Individual; MISS AMERICA COMPETITION, LLC, a Limited Liability Company; MISS AMERICA IP, LLC, a Limited Liability Company.

Respondents.

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COMPLAINANT DANIELLE HAZEL, BY AND THROUGH HER ATTORNEYS OF RECORD, HEREBY BRINGS THIS VERIFIED COMPLAINT AGAINST THE ABOVE-NAMED RESPONDENTS:

1. Complainant Danielle Hazel (“Ms. Hazel”) is an individual who resides in Brooklyn, New York. At all relevant times, Ms. Hazel was a permanent resident of Brooklyn, New York.

2. Ms. Hazel is informed and believes, and based thereon alleges, that Respondent Robin Fleming, an Individual, resides in the state of Florida and is the owner and Chief Executive Officer of Respondents Miss America Competition, LLC and Miss America IP, LLC (collectively hereinafter “Miss America”). Ms. Hazel is informed and believes that Miss America Competition, LLC and Miss America IP, LLC are incorporated in the state of Florida.

3. The Miss America pageant enterprise encourages people from around the United States, including in New York state, to “become a local or state participant” in the pageant. (See, e.g.: <https://www.missamerica.org/signup/>; club.missamerica.org/join-page, recruiting participants residing in New York state).

4. Participants receive prize money and in-kind prizes as well as other benefits

including networking opportunities, publicity, and a charitable platform. For example, Miss America's website, states: "Why participate? Do it for the . . . Applause! Receive Recognition for your efforts and your community; Personal Development – Gain valuable experience and develop life skills; Crown & Awards! Winners receive scholarships towards tuition for college/grad school & a crown!; . . . Sisterhood! Make lifelong friends with other like-minded motivated women; Growth...Foster a positive, self-motivated mindset to achieve your goals." (<https://www.missamerica.org/signup/>).

5. The entry requirements on Miss America's Website state in relevant part that "For All Ages you must ALSO meet criteria as shown below: . . . [Have] No legal dependents." Attached hereto as Exhibit A is a true and correct copy of Miss America's current website.

6. Therefore, all mothers (biological, adoptive, or even by marriage) are banned from participating in the pageant at any level (local, state, and national levels). Ms. Hazel is informed and believes that Miss America Competition, LLC and Miss America IP, LLC, the national organization, enforce the discriminatory entry-requirements at the local and state levels.

7. This discrimination is continuing and ongoing, and as of the date of completing this intake, the discriminatory rule remains on their website.

8. Despite satisfying all of the other entry requirements for Miss America, Ms. Hazel is rendered ineligible to enter because she has a son who is her legal dependent.

9. Knowing that she is ineligible because of this facially discriminatory rule, as clearly displayed on their website, Ms. Hazel has been deterred from entering the pageant. This has occurred on a continuous and ongoing basis from in or about 2019 to the present.

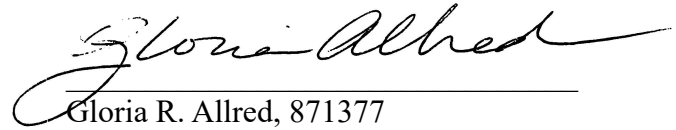
10. As a result of the discriminatory rules, she has been deprived of an opportunity that was extremely meaningful to her. She was not merely interested in fame or in prizes, but also dreamt of having the unparalleled charitable platforms Miss America provides. In addition, this exclusion is degrading to her, as it is based upon the antiquated stereotype that women cannot be both a mother and be beautiful, poised, passionate, talented, and philanthropic.

11. Ms. Hazel has not previously filed any other civil or administrative action with

respect to the underlying facts of this Complaint.

Respectfully Submitted,

Dated: September 14, 2024

A handwritten signature in cursive script that reads "Gloria R. Allred". The signature is written in black ink and is positioned above a horizontal line.

Gloria R. Allred, 871377

ALLRED, MAROKO & GOLDBERG

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EXHIBIT A

Eligibility for 2026 and beyond.

To become a local or state participant for the Competition Cycle 2026, (some states starting locals in March of 2024) competing as a State Participant in January 2026, you must meet the age criteria as shown below.

- Miss America 18-28 – must be 18 by state competition, and no older than 27 at state competition
- Miss America's Teen 14-17 – must be 14 by state competition and no older than 17 at state competition.

For All Ages you must ALSO meet criteria as shown below:

- Be a United States citizen
- Be a female
- Single
- No legal dependents
- Meet residency requirements for competing in your city or state

To learn more, become a Club America Member today!

START HERE: Register

Screenshot from <https://www.missamerica.org/signup/> captured September 13, 2024.

VERIFICATION

DANIELLE HAZEL, being duly sworn, deposes and says:

I am the Complainant in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

DANIELLE HAZEL, COMPLAINANT

Sworn before me this __ day of September, 2024.

NOTARY PUBLIC

VERIFICATION

DANIELLE HAZEL, being duly sworn, deposes and says:

I am the Complainant in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

Danielle Hazel

DANIELLE HAZEL, COMPLAINANT

Sworn before me this 14th day of September, 2024.

Brandon M Rivera

NOTARY PUBLIC

Brandon M Rivera
Notary Public State of New York
No. 01R16415838
Commission Expires 03/29/2025