

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

EDWARD WILLIAMS	)	
111 N. Sterling	)	Case No.
Sugar Creek, Missouri 64054	)	
Plaintiff,	)	
v.	)	Division No.
	)	
KANSAS CITY, MISSOURI POLICE	)	JURY TRIAL DEMANDED
DEPARTMENT A/K/A BOARD OF POLICE	)	
COMMISSIONERS	)	
1125 Locust Street	)	
Kansas City, Missouri 64106	)	
Defendant.	)	

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**PETITION FOR VIOLATIONS OF  
THE MISSOURI HUMAN RIGHTS ACT**

COMES NOW, Plaintiff, EDWARD WILLIAMS (herein after "Mr. Williams or Plaintiff") and for his cause of action against KANSAS CITY, MISSOURI POLICE DEPARTMENT A/K/A BOARD OR POLICE COMMISSIONERS, ("KCPD or Defendant") on claims of unlawful discrimination and retaliation arising under the Missouri Human Rights Act, R.S.Mo. §§ 213.010 *et seq.* Plaintiff seeks compensatory and non-economic damages against Defendant and states as follows:

**PARTIES**

1. Edward Williams resides at 111 N. Sterling, Sugar Creek, Jackson County, Missouri 64054. He is a 44-year-old Caucasian male who was over the age of forty (40) at all relevant times herein.
2. Mr. Williams has been employed at KCPD for approximately the last twenty-one (21) years and the events that gave rise to this lawsuit all occurred during that time period.

3. Managers and employees discriminated against Mr. Williams based on his disability, age, and race. He was also retaliated against for complaining and reporting disability, age, and race discrimination in the workplace.

4. KCPD whose headquarters or principal place of business are located at 1125 Locust Street Kansas City, Jackson County Missouri and is an employer within the meaning of the Missouri Human Rights Act.

5. At all times relevant hereto, KCPD was Mr. Williams' employer, and he was a full-time employee.

6. KCPD is a legally organized entity created and established under and by virtue of the laws of the state of Missouri which acts through agents. It is liable for the conduct of its agents acting within the course and scope of their agency; its own negligence or unlawful conduct; the acts of its agents which it knowingly ratifies; injuries incurred by agents' performance of its non-delegable duties; acts done by agents for which the agency relationship allows or assists the agent to perform; and acts its' agents take by virtue of their position with KCPD.

### **JURISDICTION & VENUE**

7. Defendant discriminated against Plaintiff in a place of public accommodation and retaliated against Plaintiff, thereby violating the Missouri Human Rights Act, R.S.Mo. § 213.010 *et seq.* ("MHRA").

8. Plaintiff seeks actual damages, non-economic damages, costs, fees, interest, and equitable relief, including an enhancement of fees, front pay, expert fees, and other costs.

9. Plaintiff demands a jury trial of all facts alleged herein disputed by Defendant.

10. Mr. Williams is bringing this action against Defendant pursuant to the MHRA for the discriminatory and retaliatory behavior of the Defendant by way of its managers, supervisors

and employees regarding their discriminatory treatment of Mr. Williams and their failure to properly document, investigate, and correct the unlawful conduct Mr. Williams complained of.

11. Jurisdiction and venue are proper in Jackson County, Missouri pursuant to R.S.Mo. § 213.111.1.

12. Defendant's unlawful employment practices complained of herein occurred in Jackson County, Missouri, and accordingly, jurisdiction and venue are proper in this Court. This Court has jurisdiction over the subject matter pursuant to R.S.Mo. § 478.070 as this is an original civil action seeking monetary damages for causes of action accruing in the State of Missouri.

13. Venue is properly laid in this Court under R.S.Mo. § 508.010 as the events alleged in this Petition took place in whole, or in part, in Jackson County, Missouri.

14. On or about July 15, 2021, Mr. Williams dual filed a Charge of Discrimination ("Charge") with the Equal Employment Opportunity Commission ("EEOC") and the Missouri Commission on Human Rights ("MCHR") based on his claims of disability, race, and age discrimination and retaliation.

15. The matter was assigned EEOC Charge No. 563-2021-02270, and MCHR Charge No. FE-07/21-33397.

16. On or about January 18, 2023, the MCHR issued Mr. Williams a Right to Sue letter ("RTS"). (A copy of the charge and RTS letter is attached, and the allegations therein are incorporated into this Petition as **Exhibit A**).

17. Mr. Williams' Petition is filed within (90) ninety-days of the issuance of the MCHR RTS and within two years of the discrimination complained of.

18. Williams has exhausted his administrative remedies against Defendant regarding his claims of disability, race, and age discrimination and retaliation. Therefore, he has met all conditions precedent to filing this action.

### **GENERAL ALLEGATIONS**

19. KCPD, through its agents, has exhibited a constant history of discriminatory and retaliatory behavior towards Mr. Williams dating back to 2021 and beyond.

20. Williams began his employment with KCPD approximately twenty-one (21) years ago as a police officer.

21. Williams had a strong performance record during his employment at KCPD before and after the events that give rise to this action.

22. During Plaintiff's employment with KCPD, Plaintiff has sustained several work-related injuries, including to his knee, shoulder and head.

23. Plaintiff moreover has disclosed to Defendant that he has a medical condition that qualifies as a disability and he has requested accommodations for. Such medical conditions include:

- a. Plaintiff has lost approximately 80% of the cartilage in his left knee.
- b. Plaintiff has suffered a bulging herniated disc in his back.
- c. Plaintiff sustained a work-related injury when he was hit by a car while on the clock, causing a torn labrum in his left shoulder and requiring surgery on or about March 31, 2022. Plaintiff subsequently returned to work on or about August 2022.
- d. Plaintiff moreover was diagnosed with a 40% hearing loss in both ears as a result of being a motorcycle officer.

24. On or about February of 2019, Plaintiff received a “perfect” performance evaluation by Sergeant Switzer, where Plaintiff normally received such high remarks in his evaluations.

25. However, several days after receiving the evaluation, Sergeant Switzer gave Plaintiff his evaluation back and informed Plaintiff that the command staff would not accept his evaluation. Sergeant Switzer did not say why his evaluation would not be accepted but advised Plaintiff to “be careful.”

26. Several months later, Sergeant Anthony White was assigned to Plaintiff’s squad and delivered an entirely different evaluation, stating that Plaintiff had low ticket numbers early on in the year.

27. On one occasion, while working at a Royal’s game, a family that appeared to be impoverished was walking by and Sergeant White said “here comes Williams’ family.”

28. Due to the unprofessional behavior of Sergeant White, Plaintiff was granted a transfer to Sergeant Slaughter’s (“Slaughter”) squad.

29. Beginning in approximately 2015, KCPD has continuously and repeatedly advised Plaintiff and his fellow officers that if they did not fulfill a “ticket quota” then they would be kicked out of the unit and sent straight to “dogwatch” which is an overnight shift viewed by many as undesirable and frequently worked by officers with low seniority. This directive came straight from the then Chief of Police Richard Smith (“Smith”).

30. In approximately 2018, Smith held a mandatory meeting at Plaintiff’s unit because the command staff noticed a drop in tickets so they set goals.

31. Leadership advised Plaintiff and other officers that they knew they could no longer issue a “ticket quota” so they set a quota to require at least 100 traffic stops per month. This was based on the average number of car stopped there were to generate the previous ticket quotas.

32. While in the traffic unit, it was communicated to Plaintiff that each officer would be expected to issue 1,820 tickets by the end of the year and that any performance warnings did not count against the officer’s ticket count, indicating that all KCPD cared about was the money generated by the tickets issued.

33. Sergeants would print out the tickets and rank officers by their ticket count. This continues to date.

34. Officers have received unsatisfactory marks on their evaluations and had duties and benefits stripped for low ticket writing numbers. This continues to date.

35. After the directives were issued regarding the quotas, Plaintiff believes that he began to receive arbitrary treatment.

36. Pursuant to **RSMo 304.125. Traffic violation citation quota prohibited--exception.** — No political subdivision or law enforcement agency shall have a policy requiring or encouraging an employee to issue a certain number of citations for traffic violations on a daily, weekly, monthly, quarterly, yearly, or other quota basis. This section shall not apply to the issuance of warning citations. See *Id.* (L. 2016 S.B. 765) effective August 28, 2016.

37. After RSMo 304.125 was adopted into law, KCPD leadership advised the officers that they would be

38. On or about March of 2021, Plaintiff and other officers were issued body cameras that required the officers to spend between two to three hours a day at the unit charging the body cameras.

39. However, command staff advised Plaintiff and others to continue working without bodycams being charged due to low ticket numbers being issued by KCPD officers, despite KCPD policy forbidding such work without the charging of bodycams.

40. On or about May 19, 2021, Plaintiff was placed on a personal performance improvement plan (“PIP”) due to low ticket quota, despite other officers in the department being down more than the previous years’ performance and not being issued a personal improvement plan.

41. Plaintiff’s sergeant advised Plaintiff that he was not meeting his numbers for citations and that the PIP could affect his transfer request to the airport.

42. The PIP issued on May 19, 2021 required Plaintiff to stop ten cars every day for a year.

43. Plaintiff was further informed by Slaughter that he should have informed Plaintiff sooner of what the ticket quota expectations were prior to giving him such Plan.

44. Moreover, the PIP was also provided to Plaintiff orally rather than in writing.

45. On or about May 26, 2021, Slaughter advised Plaintiff that he would be removing Plaintiff’s notes on the bottom of his activity logs referencing the PIP and the goals for tickets that were set by the Sergeant and Captain. Slaughter advised that he was removing the notes because he did not want to make the Captain angry.

46. Slaughter told Plaintiff that he is not on a traditional PIP per se but these are goals command staff wants Plaintiff to strive for. Slaughter further stated that if Plaintiff stays on track, then he will not have to make up stops and tickets on vacations and other off days.

47. Slaughter further told Plaintiff that if he continues to put the notes on his activity log, that the captain will view it as Plaintiff needing closer supervision, and that Plaintiff does not want to make the Captain mad.

48. Plaintiff advised that he was told in the original meeting that he needed to document what he was doing and why and that was his purpose with the notes so he was confused by Slaughter's communication.

49. Plaintiff subsequently emailed the HR department his concerns regarding the PIP.

50. On or about May 27, 2021, Plaintiff resent his complaint to HR and again received no response.

51. On or about May 31, 2021, Plaintiff sent another email to HR confidential inquiring about his complaint.

52. Plaintiff's complaints also included directives from leadership to go to minority neighborhoods to write tickets because of the belief that it would be easier to write multiple citations on every stop.

53. Plaintiff also was concerned by his Captain advising him and others to "approach every car with the mindset to be ready to kill everybody in the car."

54. Plaintiff also reported how his Captain expressed his views that officers should only respond to calls in the white neighborhoods like north in Shoal Creek and out south because those are the folks who are actually paying for the police and that officers should not respond to calls in the minority filled areas north of Bannister, west of 435, south of the river, because those people do not vote the same way as the people out south, east, and north.

55. On or about June 1, 2021, KCPD had a BBQ before a subsequent meeting was to be held where Sergeant Grant Ruark and other Sergeants were discussing Plaintiff's complaint

about ticket quotas on the traffic unit and Sergeant Ruark stated, “oh great, we’ll all be giving statements before long,”

56. Plaintiff believed the directives he received from KCPD leadership to be discriminatory and in violation of the law and Plaintiff reported such to upper KCPD leadership and HR.

57. Following June 1, 2021, several Sergeants and command staff ignored Plaintiff.

58. Furthermore, typical practice within KCPD is to separate the individual who made a complaint from the individual the complaint is about in order to limit the possibility of retaliation. Such practice was not followed and it was treated as “business as usual” between Plaintiff and Slaughter.

59. On or about June 2, 2021, HR supervisor Major Brad Deichler finally confirmed receipt of Plaintiff’s complaint.

60. On or about June 16, 2021, Plaintiff, Captain Young and others were in a meeting and Captain Young quoted some of Plaintiff’s complaint and used examples while pointing at Plaintiff, indicating that such complaint made to HR was not kept confidential.

61. Following the 06/16/2021 meeting, Plaintiff was further advised by command staff to operate without a fully charged bodycam because it was impacting their ticket numbers. Plaintiff subsequently complained about such directive and made reports regarding the same.

62. Major Gates subsequently issued an email on June 18, 2021, stating that such traffic unit officers were not to work without fully charged bodycams.

63. On or about June 21, 2021, Plaintiff received a letter from Major Deichler stating that his complaint had been investigated and no violation was committed, while Plaintiff himself

was never interviewed concerning his allegations and, upon information and belief, no other individual was also ever interviewed in connection with such investigation either.

64. On or about August 10, 2021, Sergeant Ruark emailed Plaintiff and others a directive that they were not to speak with the media without KCPD's permission regarding tickets being issued in KCMO.

65. On or about August 14, 2021, Plaintiff heroically stepped in to help victims and/or apprehend suspects at a nearby shooting in Westport.

66. Plaintiff was verbally reprimanded by Slaughter for such actions and advised Plaintiff that he should have stood by and waited for district cars to show up before Plaintiff went to help.

67. Additionally, during Plaintiff's employment with KCPD, Plaintiff was a motorcycle officer who requested a car as his primary vehicle instead, as he had suffered substantial hearing loss due to being a motorcycle officer.

68. Plaintiff was informed that he had to fill out a memo and send it through the chain of command and did so.

69. Plaintiff was thereafter told that there were three individuals "in line" to get a car as their primary vehicle and Plaintiff himself was second in line. Subsequently, the officer in first place and third place in line were issued a car as their primary vehicle while Plaintiff was not.

70. When Plaintiff inquired about being skipped in line, Slaughter stated that it was "the old Capitan way of handling things" and said if Plaintiff did not have a copy of his own memo, there wasn't much Slaughter could do about getting him a car.

71. Plaintiff to this day has not yet been granted a car as his primary vehicle rather than a motorcycle, despite being on a motorcycle potentially causing further hearing loss.

72. Throughout Plaintiff's employment with KCPD, Plaintiff has advocated on behalf of his colleagues and specifically reported that he believed he and his colleagues were being directed to engage in potentially racially discriminatory treatment toward African Americans and other minorities which created safety concerns and a hostile work environment.

73. Plaintiff has repeatedly been ordered by his superiors to perform KCPD duties without a charged bodycam and has been threatened with further discipline, demotion and other forms of reprimand if he did not do so.

74. Due to the conduct of KCPD, Williams has suffered significant anxiety, depression, stress anger, and humiliation.

**COUNT I – RACE DISCRIMINATION AND HARASSMENT IN  
VIOLATION OF THE MHRA**

75. Mr. Williams reasserts and re-alleges the allegations set forth in each and every other paragraph as if fully set forth herein.

76. The acts described constitute race discrimination and harassment in violation of the MHRA.

77. Mr. Williams is Caucasian male who has complained to Defendant about him, and his colleagues being directed to engage in potentially racially discriminatory treatment toward African Americans and other minorities.

78. Mr. Williams was subjected to race discrimination and harassment by Defendant in the following ways including, but not limited to subjecting Mr. Williams to hostile and unfair treatment as the result of the countless times management acted in a harassing, disrespectful and discriminatory manner.

79. Williams was also directed to by his superiors to target minority citizens and was constantly subjected to racially inflammatory rhetoric by his superior officers directed at African American and other citizens which Williams complained of.

80. Mr. Williams' race was a motivating factor in the above-described discrimination and harassment as similarly situated officers were not treated in a similar manner as Williams.

81. Mr. Williams reasonably believes that minority officers were subjected to similar rhetoric nor given such directives by the white commanding and superior officers because it would have been obviously discriminatory and minority officers would have certainly reported such behavior by their superiors.

82. The conduct cited above was so severe and pervasive that it affected the terms, conditions and privileges of Mr. Williams' employment.

83. Mr. Williams and any reasonable person in his position would reasonably view it as such.

84. The conduct cited above was adverse and damaging and caused Mr. Williams great emotional upset.

85. He is frequently stressed out, loses sleep, cannot focus, and is constantly fearful of what else might happen to him and is struggling to recover from the damage cause by the discriminatory and retaliatory treatment he received while employed at KCPD.

86. The actions and conduct of the Defendant set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Mr. Williams.

WHEREFORE, Plaintiff, Mr. Williams prays for judgment against Defendant on Count I of his Petition, for a finding that he has been subjected to unlawful race discrimination and

harassment prohibited by the MHRA; for an award of back pay, front pay, including lost bonuses, promotion opportunities and other benefits, including interest; for an award of compensatory and non-economic damages; for his costs expended; for his reasonable attorneys' and expert fees and expenses, and for such other and further relief the Court deems just and proper.

**COUNT II – AGE DISCRIMINATION AND HARASSMENT IN  
VIOLATION OF THE MHRA**

87. Mr. Williams reasserts and re-alleges the allegations set forth in each and every other paragraph as if fully set forth herein.

88. The acts described constitute age discrimination and harassment in violation of the MHRA.

89. Plaintiff is over the age of forty (40) and is thus a member of a protected class.

90. Mr. Williams was subjected to age discrimination and harassment by Defendant in the following ways including, but not limited to subjecting Mr. Williams to hostile and unfair treatment as the result of the countless times management acted in a harassing, disrespectful and discriminatory manner.

91. Mr. Williams' age was a motivating factor in the above-described discrimination and harassment as officers under the age of forty (40) were not treated in a similar manner as Williams.

92. The conduct cited above was so severe and pervasive that it affected the terms, conditions and privileges of Mr. Williams' employment.

93. Mr. Williams and any reasonable person in his position would reasonably view it as such.

94. The conduct cited above was adverse and damaging and caused Mr. Williams great emotional upset.

95. He is frequently stressed out, loses sleep, cannot focus, and is constantly fearful of what else might happen to him and is struggling to recover from the damage cause by the discriminatory and retaliatory treatment he received while employed at KCPD.

96. The actions and conduct of the Defendant set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Mr. Williams.

WHEREFORE, Plaintiff, Mr. Williams prays for judgment against Defendant on Count II of his Petition, for a finding that he has been subjected to unlawful age discrimination and harassment prohibited by the MHRA; for an award of back pay, front pay, including lost bonuses, promotion opportunities and other benefits, including interest; for an award of compensatory and non-economic damages; for his costs expended; for his reasonable attorneys' and expert fees and expenses, and for such other and further relief the Court deems just and proper.

**COUNT III– DISABILITY DISCRIMINATION AND HARASSMENT IN  
VIOLATION OF THE MHRA**

97. Mr. Williams reasserts and re-alleges the allegations set forth in each and every other paragraph as if fully set forth herein.

98. The acts described constitute disability discrimination and harassment in violation of the MHRA.

99. Mr. Williams suffers from medical condition(s) that are considered a disability under the MHRA.

100. Mr. Williams was subjected to disability discrimination and harassment by Defendant in the following ways including, but not limited to subjecting Mr. Williams to hostile and unfair treatment as the result of the countless times management acted in a harassing, disrespectful and discriminatory manner.

101. Mr. Williams' disability was a motivating factor in the above-described discrimination and harassment as non-disabled similarly situated officers were not treated in the same or similar manner as Williams.

102. The conduct cited above was so severe and pervasive that it affected the terms, conditions and privileges of Mr. Williams' employment.

103. Mr. William and any reasonable person in his position would reasonably view it as such.

104. The conduct cited above was adverse and damaging and caused Mr. Williams great emotional upset.

105. He is frequently stressed out, loses sleep, cannot focus, and is constantly fearful of what else might happen to him and is struggling to recover from the damage cause by the discriminatory and retaliatory treatment he received while employed at KCPD.

106. The actions and conduct of the Defendant set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Mr. Williams.

WHEREFORE, Plaintiff, Mr. Williams prays for judgment against Defendant on Count II of his Petition, for a finding that he has been subjected to unlawful age discrimination and harassment prohibited by the MHRA; for an award of back pay, front pay, including lost bonuses, promotion opportunities and other benefits, including interest; for an award of compensatory and non-economic damages; for his costs expended; for his reasonable attorneys' and expert fees and expenses, and for such other and further relief the Court deems just and proper.

**COUNT IV- R.S.Mo. §213.070 RETALIATION IN  
VIOLATION OF THE MHRA**

107. Plaintiff, Mr. Williams hereby incorporates by reference each and every paragraph as though it is fully set forth herein.

108. Mr. Williams engaged in protected activity by opposing, complaining about and reporting harassing and/or discriminatory conduct.

109. Defendant retaliated against Mr. Williams because he engaged in protected activity.

110. Defendant retaliated against Mr. Williams in numerous ways such as but not limited to refusing to investigate his allegations of discrimination, targeting him for discipline and misconduct, and arbitrarily denying his development opportunities despite his qualifications and excellent performance history.

111. Defendant's retaliation against Mr. Williams was intentional, willful, malicious and calculated toward Plaintiff and thus such conduct constituted willful violations of state law.

112. Because of the acts of reprisal Defendant inflicted upon Mr. Williams, he has suffered, and will continue to suffer pain, emotional distress, anguish, anxiety, humiliation, embarrassment, and lost wages.

113. The actions and conduct set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Mr. Williams.

WHEREFORE, Plaintiff, Mr. Williams prays for judgment against Defendant on Count IV for a finding that he has been subjected to unlawful retaliation in violation of the Missouri Human Rights Act; for an award of back pay, front pay, including lost bonuses, promotion opportunities and other benefits, including interest; for an award of compensatory and non-economic damages; for his costs expended; for his reasonable attorneys' and expert fees and expenses, and for such other and further relief the Court deems just and proper.

**COUNT V-**  
**Retaliation for Worker's Compensation (in violation of R.S.Mo. 287.780)**

COMES NOW, Plaintiff, and for Count V of the complaint, for retaliation pursuant to RSMO. 287.780 states:

112. Plaintiff hereby restates and incorporates by reference, repeats and re-alleges each and every allegation contained in this complaint as if fully set forth herein in Count V.

113. Mr. Williams was targeted in whole or in part because he reported injuries he sustained during and in the course of his employment with KCPD to management.

114. Upon Mr. Williams reporting injuries to management and leadership, he was treated adversely by management who ultimately denied Plaintiff advanced employment opportunities and targeted Plaintiff for arbitrary discipline in hopes of terminating Plaintiff's employment.

115. Under Missouri law, injuries that occur while an employee performing their duties have been found to be work-related under worker's compensation law.

WHEREFORE, Plaintiff prays for the Court to find that Defendant has violated R.S.Mo. 287.780 and therefore, Plaintiff is entitled to recovery for pecuniary and non-pecuniary damages including but not limited to lost wages and benefits, out of pocket expenses, interest, mental and emotional distress, and reasonable attorney's fees; and that this Court makes such other orders as it may deem just and proper in the circumstances.

**COUNT VI-WHISTLEBLOWER RETALIATION**  
**Violation of RSMo. 105.055**

COMES NOW, Plaintiff, and for Count VI of the petition, retaliation pursuant to RSMo. 105.055 states:

116. Plaintiff hereby restates and incorporates by reference, repeats and re-alleges each and every allegation contained herein this petition as if fully set forth herein this Paragraph and count.

117. Plaintiff reported that he and his fellow officers were being given ticket quotas in violation of RSMo. 304.125 and provided detailed information to KCPD administrators, human resources personnel, KCPD counsel, and outside agencies investigating the allegations.

118. Plaintiff was also repeatedly told to conduct police activities without the use of a functioning body camera despite the fact functioning body cameras were issued to ensure proper safe policing and to build rapport and relationships with minority communities who are disproportionately targeted by corrupt and unfair policing practices.

119. Plaintiff's conduct has contributed in whole or in part to Defendant KCPD having to amend policies and practices related to ticket quotas and the use of body cameras as well as having to amend previous reports related to ticket quotas.

120. As a result of Plaintiff reporting the conduct alleged herein, Plaintiff was subjected to retaliatory conduct including but not limited to lost opportunities and benefits he was entitled to.

121. Plaintiff's protected activity in reporting Defendant was a contributing or motivating factor in his retaliation and harassment.

122. Plaintiff has suffered economic loss, emotional distress, and other damages as a result of Defendant's actions.

123. Defendant acted in reckless disregard of Plaintiff's rights and/or with evil motive.

WHEREFORE, Plaintiff prays for judgment against Defendant on Count VI of his Petition, for a finding that he has been retaliated against in violation of R.S.MO § 105.055 (whistleblowing); for an award of back pay, including lost wages; and other benefits including interest; for an award of compensatory and any other damages permitted by law; for his costs expended; reinstatement

to his position with Defendant including time and title, reasonable attorneys' and expert fees and expenses, and for such other and further relief the Court deems just and proper.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief and judgment as follows:

- i) Defendant is ordered to make Plaintiff whole by providing appropriate back and front pay and benefits, with prejudgment interest, in amounts to be proved at trial
- ii) Plaintiff is awarded extraordinary and/or equitable relief as permitted by law, equity and any and all applicable statutory provisions related hereto;
- iii) Plaintiff is awarded all compensatory, restitutionary, and/or remedial relief;
- iv) Plaintiff is awarded pre-judgment interest and post-judgment interest, as well as her reasonable attorneys' fees, expert witness fees and other costs; and,
- v) Plaintiff is awarded such other legal and equitable relief as the Court deems appropriate and just.
- vi) If the evidence is sufficient, Plaintiff may eventually seek punitive damages but understands that such relief cannot be requested in the petition per statute.

**JURY DEMAND**

Plaintiff, Mr. Williams requests a trial by jury on issues triable by jury.

**RESPECTFULLY SUBMITTED,**

/s/ *Gerald Gray II*  
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