

3. The Jacksonville Sheriff's Office (JSO) is a joint city-county law enforcement agency, which has primary responsibility for law enforcement, investigation, and corrections within the consolidated City of Jacksonville and Duval County, Florida, United States.

4. T.K. Waters ("Waters") is a citizen of Florida and a resident of Duval County Florida.

5. Waters is currently the duly elected Sheriff of Jacksonville Florida, Duval County Florida.

6. Waters was elected to the position of Sheriff of Jacksonville Florida in November 2022.

7. Waters is a black male over the age of 40.

8. John Rutherford ("Rutherford") was the duly elected Sheriff of Jacksonville Florida, Duval County Florida from 2004- 2015.

9. Rutherford is a white male over the age of 40.

10. Mike Williams ("Williams") was the duly elected Sheriff of Jacksonville Florida, Duval County Florida from 2015 - until June 2022.

11. Williams is a white male over the age of 40.

12. Pat Ivey ("Ivey") was the appointed Interim Sheriff of Jacksonville Florida, Duval County Florida from June through November 2022.

13. Ivey is a white male over the age of 40.

14. The actions giving rise to this Complaint occurred in the Consolidated City of Jacksonville, Florida.

15. Bennett claims she was the victim of ongoing discrimination throughout her employment with the JSO under the employment and supervision of Sheriffs Rutherford, Williams, Ivey, and Waters. Bennett alleges continuing acts throughout her employment with the JSO.

16. Jurisdiction is proper pursuant to 28 USC §1331 and 1343 as this action is brought pursuant to Title VII of the Civil Rights Act of 1964.

17. Supplemental jurisdiction exists pursuant to 28 USC §1367 over Plaintiff's pendant state law claims as they are so related to Plaintiff's federal claims that they form part of the same case or controversy under Article III of the United States Constitution.

18. Venue is proper pursuant to 28 USC §1391(b)(1) and (2) because all Defendants reside in the state of Florida and one or more Defendants reside in this judicial district and a substantial part of the events or omissions giving rise to Plaintiff's claims, including Defendants' constitutional violations, intentional torts, and otherwise violative conduct, occurred within the Middle District of Florida.

19. Plaintiff has complied with all administrative requirements prior to filing suit.

20. Plaintiff no longer has pending complaints with the Equal Employment Opportunity Commission that have not been resolved. Those complaints may be referenced herein for context, but such claims have not specifically been brought herein.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

21. Bennett submitted her EEOC complaint through the EEOC online portal on February 21, 2021, with a request to issue a charge.

22. The EEOC identified the inquiry with EEOC Number 510-2021-02774.

23. Submission of an inquiry through the portal with a request to issue a charge triggers the timeliness satisfaction for pursuing a charge of discrimination, even if the charge is issued at a later date.

24. The charge of discrimination was issued on August 15, 2021.

25. The charge was under investigation with the EEOC until August 16, 2023, when the right to sue was issued by the EEOC.

26. This matter was filed within 90 days of when the notice of rights was received by Plaintiff.

27. Plaintiff has also filed inquiries with the EEOC related to ongoing discrimination on February 3, 2023, May 17, 2023, June 30, 2023, and September 15, 2023.

28. The inquiry of February 3, 2023, was assigned EEOC Case No. 510-2023-03385.

29. The inquiry of May 17, 2023, was assigned EEOC Case No. 510-2023-06473.

30. Plaintiff understands that the February 3, 2023, and May 17, 2023, charges were closed by the EEOC because they were considered a part of charge 510-2021-02774 which was still in an open EEOC investigation.

31. The inquiry of June 30, 2023, was assigned EEOC Case No. 510-2023-07891.

32. The inquiry of September 15, 2023, was assigned EEOC Case No. 510-2023-10259.

33. EEOC Case No. 510-2023-07891 and EEOC Case No. 510-2023-1025 are still open inquiries related to Plaintiff's claims of discrimination and termination.

34. Plaintiff's employment with the JSO was terminated on July 21, 2023.

35. Because Plaintiff's employer is a governmental entity, the charges must be issued by the Department of Justice who has the right to keep the same for 180 days.

STATEMENT OF FACTS

36. I was hired by the Jacksonville Sheriff's Office on April 2, 2002.

37. I was wrongfully terminated on July 21, 2023.

38. Throughout my employment I received at least 30 letters of commendation in addition to favorable reviews for my work performance from her supervisors.

39. In 2006, while I was on the Zone 5 Task Force, my supervisor Sgt. Gregory Foxworth tried to force me to falsify a crash report. The officer who caused the crash had several driving infractions on his record. The officer struck another vehicle while pursuing a stolen vehicle, even though the Sheriff's Office policy was not to pursue stolen vehicles. This officer recklessly struck a civilian's vehicle that was backing out of a driveway. The driver's family was standing in the front yard when it happened, and the officer admitted he was at fault. Sgt. Foxworth was not working that day. I was not on the scene but was called to write the report, even though a patrol officer working in the area could have written it. I wrote the crash report based on what I saw and what was told to me. When Sgt. Foxworth came back to work, he called me to his office. When I walked into his office, he handed me my crash report with red ink all over it of what he

wanted me to falsify and change. I informed him this was illegal and against the law. I told him I would not change the report. He then informed me he was my supervisor and whatever he told me I had to do. I informed him I did not have to follow his orders if they were criminal. He then told me and Officer Whitt to go back to the scene and investigate the crash. Officer Whitt agreed that the officer was at fault. We went back to Sgt. Foxworth's office and informed him that the officer was still at fault. When I walked out of his office my front tire was flattened. After thinking about the right thing to do I reported the incident to Chief Clark because I trusted him. He informed me that he admired my determination and if things got worse, to notify him and he would transfer me. Once they found out I reported my supervisor, this began years of retaliation, discrimination and harassment towards me. I would come to work and transfer slips were put in my mailbox. My squad mates would not back me up on calls like they did prior to this incident. After enduring this treatment for so long and fearing for my life I went and spoke with Chief Clark and asked for a transfer.

40. One day after reporting this incident I woke up for work and went to take my dog outside. When I opened the back door there was a dead rat on the ground in front of the door. Sgt. Foxworth was personal friends with Director Kelly who was the fourth person in charge of the department at the time and he had it in for me because I reported his friend. I was wearing my hair in corn roll braids just like many black and white females on the department. One day I got a call from my Sgt. Ricky Brown, and he informed me Director Kelly stated my hair was "offensive" and that I could not wear braids in my hair anymore. I filed a complaint with my Union. The President of the FOP at the time was Nelson Cuba. He fought for me to be able to wear my hair in braids. I informed them I was going to file a complaint because I was tired of the treatment I was enduring. Suddenly they called a meeting of the black leaders on the department

to silence me. They asked me what issues I was having, and I informed them in detail of everything. Months went by and I never heard a word back from anyone. I then found out that Sgt. Foxworth did not get into any trouble and was found not guilty. I turned in the crash report where he wrote on it what he wanted me to falsify, and nothing happened to him. Years later one of my friends who was called into Internal Affairs to answer questions informed me that they asked him if Chief Clark and I were having a sexual relationship because he was the only one to stand up for me and do the right thing. This was a clear and obvious case of racial discrimination by telling me my hair was offensive because it was braided.

41. In June of 2017, my supervisor David Hall jumped on the bandwagon and started harassing me. In June of 2017, my uncle passed away unexpectedly. Like any job you are given time off for bereavement. That did not apply to me because Sgt. Hall informed me, I had to come to work the very next day and that I could not take bereavement days. I had to go to my supervisor who was Lt. Collier and inform him of what happened, and he allowed me to take off.

42. He continued to harass and retaliate against me. He only let the white males on the squad in charge in his absence. On 07/21/2017, he even allowed an officer (Oschner) who was training to be in charge in his presence to prevent me from being able to be in charge. This is unheard of to have an officer training a recruit and to allow them to be in charge at the same time. He did not hide his retaliation towards me. It became common to treat me however they wanted because I spoke up against corruption and did not follow the good ole boys' system.

43. The next event that changed my work life was in October of 2017, when I stopped two white male officers from killing a black man we were arresting for a DUI. One officer was pounding the victim in his face, top of his head and the back of his head like a hammer. The second officer arrived on the scene, ran up to the victim and began kicking him excessive and repeatedly in his

midsection. He was kicking the victim so hard his radio fell out of his holster. Once the radio fell on the ground the victim picked it up while he was rolling on the ground. I grabbed it out of his hand and handed it back to the officer. While the one officer was hammer punching the victim I told him he was being recorded so he would stop. I stopped the officer that was excessively kicking the victim and held my hand out and told him to stop kicking him because we do not do this. Once Lt. Collier came to the scene after everything was over the officer that was hammer punching the victim was talking to him. He said something to him, and they both looked over at me. It was then I knew my life was about to change again for the worst.

44. I was denied leave and transfers on numerous occasions. They continued not giving me the opportunity to be in charge in my supervisor's absence and did not try to hide it because the department was not going to do anything to these supervisors for treating me the way they did. Officers with less time on and less experience were allowed to be in charge over me. They were all white male officers.

45. On October 31, 2017, I had a meeting with the Chief (Schmitt) of HR in reference to my suddenly not getting my tuition reimbursement like I had received several times prior. This was my last semester and there was no way I did not turn in my paperwork to get paid. This was another example of retaliation. Prior to the meeting I asked the Chief if I could have my attorney listen in on the meeting due to my prior experience with this department and not trusting them. In a room full of Human Resources employees, he began yelling at me like I was child asking why I wanted my attorney to listen to the meeting. This man humiliated me in front of everyone and all I could do was just sit there and take it. My supervisor (Saames) was there and witnessed this and the supervisor he was training (Smith). Neither of them stood up for me. I eventually reported this incident to the Undersheriff (Ivey) and he informed me he was aware of the incident

and that the Chief felt like I stepped on his toes. Again, nothing happened when I tried to get help.

46. On November 7, 2017, I was informed I was approved to be an Xray Unit the prior month. On this date I was informed I was no longer going to be an Xray Unit. The excuse given to me by the Chief (Johnson) was he wanted earlier units due to him wanting assignments worked early. The prior shift only came in hour and a half prior to me. Each day I would review what they did and each day they did not log out on anything prior to my work shift so the excuse of wanting officers from an earlier shift to work assignments prior to my shift was a lie and this was another example of obvious retaliation.

47. On November 19, 2017, I had a family emergency due to a family member being armed, suicidal and missing. I came to work and asked my supervisor (Saames) if I could have the day off to help look for this family member and provide support. He informed me he would have to ask Lt. Collier. He came back and informed me Lt. Collier stated I could not take off. There was a white male officer who was able to take off whenever he wanted, not come to roll call because his wife was sick, and he denied me to take one day off due to an emergency. I was stressed and sick to my stomach the whole day and still had to stay at work out of them being vindictive towards me. Other officers would take off all the time for far less and it was not an issue, but this is another example of how they were allowed to treat me with no consequences to their behavior.

48. On 12/05/2017, I was informed I was approved for PIC (Person In Charge) training. The day of the class I informed my supervisor (Saames) I was on my way to training. He called me and informed me that I was no longer going to the training and someone else was going. They picked a white male officer who had less time and education than me to go to the training. I checked the

logs and some days he did not even go to the training. So, this was done to prevent me from getting this training I wanted and to also prepare me to get promoted.

49. On 09/23/2018, An officer was approved to take off from work even though we were at maximum off, and it was not for a family emergency like when I was denied. This was a white male officer they allowed to take off for a non-emergency, but I was denied.

50. On 10/18/2017, both white male officers that were normally given the opportunity to be in charge when the supervisor was not there both had recruits. Officer Green, who is the officer who was hammer punching the black male and almost killed him was allowed to be in charge even though he almost killed someone. He was never punished for this incident.

51. On 10/29/2018, Officer Green was in charge again even though he almost killed someone and falsified his use of force report. There was proof he did this, and nothing happened to him.

52. On 01/14/2018, six officers were off, and Officer Sosa put in leave on 01/12/2018, to be off and it was approved. Again, I was denied off for a family emergency.

53. On 04/27/2018, Officer Green was permitted to be in charge on numerous occasions even though he lied on his use of force report, and they knew it and had proof of it.

54. On 04/28/2018, I called for help while off duty due to a bus I was on with several elderly black handicapped people had broken down on 95 North. We were in a dangerous spot with no working lights or air conditioning. When I called for help, I identified myself as an officer. We sat on the bus for over 2 hours in the heat and in fear of being struck by oncoming vehicles due to the location and no working lights and it was becoming dark outside. I called back after the first hour and asked to speak with a supervisor (Guthrey). He became irate and began yelling at me so loud the people on the bus could hear him. Due to it taking so long and the elderly people

having to get off this bus they began calling family members to come pick them up on a busy interstate in the dark. These people were in wheelchairs and walking on canes on the interstate to vehicles. I work this same expressway and know that my department responds to the scene because FHP takes longer to respond. Just a week after this incident I received a call in the exact location and help arrived to help the stranded motorists immediately. I have video and pictures of all the help that arrived quickly. The department hated me so much they were willing to risk the safety of a bus full of elderly people lives to retaliate against me. My department never showed up to the scene to help FHP did. I spoke with someone in Records and Id when I went to get a print out of the call to file a complaint and she informed me there were several calls in reference to our bus being broken down in a bad place and elderly people in wheelchairs on the interstate and they still didn't send us help. I also checked the log and saw there were several officers available they could have sent to help us, and they chose not to.

55. On 05/14/2018, My sister Dr. Vernell Bennet wrote a letter to the Sheriff (Williams) to inform him about the corruption and how they left us stranded on the bus on the interstate. The Sheriff never responded to her and had a Chief handle it. They informed me there would be an investigation, but I was never called in to make an official statement in Internal Affairs. This again shows how I continue to beg for help, and no one helps me. It continues to show that the white males on this department can talk to me however they want and treat me however they want, and nothing ever happens.

56. On 08/07/2018, both white male officers that are usually in charge when my supervisor is gone were off so instead of letting me be in charge, they told my squad to send the reports to another supervisor. Again, they did not hide the retaliation towards myself and continued denying me the chance to get experience being in charge which helps for promotions.

57. On 09/13/2018, Officer Green put in leave to take off on the same workday and was approved yet I was denied off for a family emergency.

58. On 09/13/2018, I could no longer deal with the unfair treatment and hostile working environment I was put through, so I requested a meeting with the Undersheriff (Ivey). During this meeting the Lt. and Sgt. over the Integrity Unit was there. The Integrity Unit investigates criminal acts by city employees. I informed them of the excessive force incident and how they beat the victim and charged him with crimes he did not commit prior to the suspect's final court appearance. The Undersheriff withheld this information from the prosecutor that could have prevented him from being charged with crimes he did not commit. After the meeting the Undersheriff covered the tracks of everything of everything I complained about. Suddenly a new prosecutor was assigned. My name was removed from the case. Officer Green's use of force report mysteriously disappeared during discovery. During the meeting I was so emotional due to years of retaliation and discrimination I began crying. The Undersheriff told me to take the rest of the day off. I went there to report the crimes of the officers, inform him of my unfair treatment and putting in numerous transfer slips that were denied for no reason. I was one of the best officers on this department and if asked anyone would tell you this. I have been Officer of the Month three times and Officer of the Year once. I tracked down, identified, and arrested a serial rapist and he is currently serving life in prison. I should have been able to transfer anywhere in the department due to my work ethic and education. Once my Lt. and Chief found out I had a meeting with the Undersheriff and Integrity, they suddenly gave me the option to transfer anywhere I wanted to because they thought they would get in trouble. They thought the Undersheriff would do right by me and they would be in trouble for how they treated me and covering up the excessive beating of the black male victim. They knew they covered up the

beating and retaliated against me and was scared. The Undersheriff transferred me to another zone. All of this happened before the Sheriff's re-election. They did not want the bad publicity and knew this would make news everywhere. Never has an officer spoke up on corruption and the last thing this department wanted was a Black female officer with an impeccable background and educated to be the main witness. He also knew beating a black man would cause riots here, so he swept everything under the rug.

59. Even in the new zone they continued the retaliation and not allowing me to be in charge. On 03/09/2020, Officer Jackson was in charge over me, and he has less time on than me. During this time, I had no write ups and was not under any investigations so I should not have been passed up.

60. On 10/16/2020, my off-duty check was stolen out of my work mailbox that was inside the police substation. This had already happened a couple times prior, and I was tired of it. So, before I filed a complaint. I sent an email to the person who works he front desk that handles all of our checks and places them in the mailbox on 10/19/20220.

61. On 10/27/2020, once he returned from vacation and saw my email he responded and informed me he made sure not to mix up my check with the other Officer Bennett's check. He said he double checked the check prior to placing it inside of my mailbox.

62. On 11/04/2020, I informed the Integrity Unit I wanted to file a complaint about my checks being stolen out of my mailbox. They immediately informed me they would not be investigating anything even though they are supposed to investigate all criminal acts, and this was a criminal act. Again, I asked for help and was ignored.

63. On 11/04/2020, I informed my supervisor (Wood) I wanted to file a complaint. I was informed by my supervisor that Lt. Penn stated it was not criminal for someone to steal my check out of my mailbox and they would not be investigating anything. Again, I asked for help and was ignored.

64. On 11/13/2020, I went to the local EEOC office to file a complaint because I continued to be mistreated and harassed and no one was helping me. I informed them of everything and was told I had no case, and they blew me off.

65. On 12/01/2020, my supervisor called off. The officer that has seniority that is usually in charge had a recruit and could not be in charge. I was next in line to be in charge. The other white male officer with less time on than me was off so on this date they did not assign someone in charge because it would have been me. Another blatant example of retaliation and discrimination.

66. On 12/03/2020, after numerous times being passed over to be in charge I sent my supervisor an email asking what his qualifications were to be in charge. He never responded.

67. On 12/04/2020, I was called into the Chief's (Waldrup) office where Lt. Penn asked me if I was ok because they had several complaints on me lately. I informed them I was fine, and I had not heard of any complaints. They then informed me Internal would be investigating.

68. On 12/07/2020, I sent a friend to the substation to get a report of the excessive beating of the black male. I knew if I printed and pulled it up, they would know. Our policy is once the investigation is over anyone can get a copy of the report. My friend informed me they intimidated her and asked for her name and asked her why she wanted the report when she asked

for it. She then informed me they asked her who sent her to get the report. She informed me they said they were not going to give her a copy of the report which is against the law.

69. On 12/14/2020, Officer Bernard was in charge even though he has less time on than me.

70. On 12/14/2020, I was flagged down in reference to an armed robbery. I called for backup, and no one responded. The person in charge (white male) that day was supposed to acknowledge the call, respond and assist me. He never said a word and the dispatcher informed me she was shocked he never tried to help me or anything.

71. On 12/23/2020, I was the only officer working the entire zone with no backups. Two white male officers were sitting in a parking lot assisting detectives. It was obvious this was arranged so I would be working alone. When manpower is this low you do not pull officers from the zone with no manpower you pull officers from another zone. The person in charge never returned my call for help. He was at the hospital on a personal matter with his wife on duty. This meant I was alone. I ended up getting an armed suicidal call with no backup. I informed dispatch I would wait for a backup. They ended up sending a supervisor to back me up.

72. On 01/19/2021, I was called into Internal Affairs and informed I was under investigation. They would not tell me what I was under investigation for which is unheard of. I did not find out what I was under investigation for until 03/2021. When I found out what I was suspended, taken off the street and placed on desk duty for it was almost laughable. We have a white male officer (Justin Peppers) who has made national news several times for beating up black men and women and charging them with crimes they did not commit. The local news did a story on him and stated the State Attorney's office flagged one of his cases and informed the Undersheriff (Ivey) he charged someone with crimes they did not commit. The Undersheriff informed the State

Attorney's Office Internal Affairs would investigate it and nothing ever happened. He was not taken off the street nor suspended like I was for petty complaints. The two incidents they took me off the street for and suspended me were both on body camera and I did nothing wrong. They wanted so badly to get something negative in my internal file they literally came up with anything they could.

73. On 02/25/2021, I received a parking ticket on my personal vehicle that was parked in the parking lot behind headquarters. I had to drive my personal vehicle to work once they suspended me and placed me on desk duty for something petty. I had been parking in the same location for months and always had my paid ticket on the dash where it could be seen. It was obvious they told this guy to put a ticket on my car because in his picture you can clearly see my paid ticket on the dash. I filed a complaint. The supervisor blew me off and even sent me the picture which showed my paid ticket on the dash. He had no excuse, so he ignored me. When we went to court the officer lied under oath and the judge dismissed my ticket.

74. On 03/2021, I was finally informed what I was under investigation for. These were minor complaints that officers get on a daily basis. They took minor incidents and made an issue out of them just to be able to have something in my file. I was humiliated during the entire process. I had no prior discipline on file. They escorted me out of police headquarters like I was El Chapo, and I committed felonies.

75. On 05/11/2021, I filed a grievance in reference to my discipline. Per contract I was supposed to hear something back within 10 days. As of 06/24/2021, I had not heard anything back from the department and the FOP did absolutely nothing for me when this was a clear violation of contract policy. I contacted the FOP President (Zona) and informed him they had not got back to me within the 10-day timeframe per contract, and this was a violation and he informed me if they

had not contacted me back it would be good for me. He never filed a grievance or said anything to anyone for them missing the 10-day deadline. My supervisor (Wood) lied numerous times during the investigation, and I informed Internal Affairs I had proof. He informed me to remove a phrase in the missing person's report that made it mandatory for him come to the scene and setup a search for the missing person. I informed him I was not comfortable doing this. This is the same incident I ended up getting suspended and taken off the streets for and nothing happened to my supervisor. Internal Affairs informed me they would not investigate it. They knew I was telling the truth, and they would have to fire him for lying on official documents and lying during his interview. Again, I asked for help and was ignored. I also informed the FOP Union President (Zona) of my supervisor telling me to falsify a document and he informed me not to tell Internal Affairs because I would be fired because no one would believe me even though I told him about the evidence I had to prove what I said to be true. Another example of the Union working against me and no one helping me.

76. On 05/2021, I was contacted by HR and informed I had to go for a psychiatric evaluation. I asked why because I was working the desk for months and never showed any reason to have an evaluation. This was another example of harassment and retaliation. When I read the evaluation, the department lied on it and the reason made no sense that they wanted me to have an evaluation. They stated they wanted me to get an evaluation for an incident that happened in 11/2020. The entire time during the investigation they never mentioned wanting me to have an evaluation. The incident was a call where the complainant kept calling for the police but was not there when I arrived. He called several times and when I went to the scene he was not there. When he finally made it to the scene, I informed him in the future if he calls the police be on the scene when he calls for officer safety. I informed him I do not go to calls and wait for anyone

because it's too dangerous and it's an easy way for an officer to be ambushed. If you ask any officer that they would tell you the same. A week after this there was news an officer was ambushed because of this same situation. This is why they told the doctor I needed an evaluation. This made no sense. Again, the department was trying to defame my name, character and credibility. They were hoping I would tell the doctor they were following me and listening to my phone calls illegally so I would appear to be paranoid schizophrenic. If this happened nobody would believe me when the beating of the black man surfaced. It did not work, and the doctor knew something was wrong with the reason I was there. He stated he didn't know why I was even there and that this is something he usually sees when a lawsuit is forthcoming. He then stated you must have pissed someone off. His assistant, who is also a licensed therapist informed me she did not know why I was there and knew nothing was wrong with me.

77. On 05/27/2021, I contacted HR via telephone and two emails for an employment verification form. I still had not received a form that takes less than a minute to complete. By 06/24/2021, I still had not received the form. Officer Thompson asked for the same form and received his immediately.

78. On 12/20/2021, Lt Lestrangle forced me to go to the hospital to violate HIPPA law and inform him what was wrong with an officer who was ran down by a Chief. They feared a lawsuit and wanted to know what her injuries were. They were not checking to see if she was ok. He texted me several times asking for updates. I did not know what her condition was because it was not my business nor was I, her supervisor. Finally, he came to the hospital angry because he had to interrupt his day. I observed him walk up to a white male nurse and start talking. The nurse then pulled something up on the computer which was none of their business and a violation of HIPPA law. There was no reason for him to be in the emergency room asking anyone to pull anything

up. He should have gone to the officer and asked her how she was feeling. I walked out into the hallway with the officer's daughter and a security guard. Lt. Lestrangle still angry he had to come check on the black female officer began yelling at me in front of the officer's daughter and the security guard. He stated, "Just leave I knew I shouldn't have had you come up here, I knew you weren't a team player just go get out of here". I stood there in shock as he disrespected me for no reason in front of citizens. He had no fear of doing this because white males have been able to talk to me anyway, they wanted and nothing ever happens. I sent my direct supervisor (Roberts) a text informing him of what happened and how I was yelled at, and nothing ever happened. Again, my cries for help were ignored. From that point on when Lt. Lestrangle came into the office he ignored me and spoke with everyone else.

79. On 01/06/2021, Lt. Lestrangle walked into the office in front of other officers and asked for my gun and badge instead of calling me to his office like he was supposed to. He brought other officers into my personal business and humiliated me. He informed me he was taking my gun and badge because I did not go to the gun range and qualify. In 22 years, I have never not gone to the range to qualify and it's always the supervisor's responsibility to make sure this is done. I informed him I did indeed go to the gun range and asked if he checked the logs at the gun range and he admitted he had not prior to asking me for my gun and badge. I asked him if he would check the logs prior to taking my gun and he stated, "No". Instead of driving me to my residence to get my department issued weapon he had another officer with an extensive writeup history take me home. He brought another officer into my personal business and humiliated me once again.

80. On 01/06/2022, I spoke with Christy Conn who was over the gun range and asked her when was re-quals to get my gun and vehicle back. She lied and stated there were no re-quals dates yet.

She spoke to me rudely and blew me off. I have never had an issue with her. She was present when I was accidentally shot in the head with a live shot gun slug that was "accidentally" placed in the can I got it out of. The slug ricocheted off the target and struck me in the head causing a severe concussion and uncontrollable bleeding. She informed me she would email me when they had a date available.

81. 01/09/2022, I know how corrupt this department is especially to black females, so I checked on the computer for makeup dates at the gun range and saw there was a date listed for 01/10/2022. Christy Conn never contacted me like she said she would, and they did not plan on me looking up the date myself. The longer they kept my gun, badge and vehicle the longer I would not be able to work off duty and make extra money. I am sure she was following orders by not contacting me about the makeup date I had just asked her about 3 days prior.

82. I was then informed by my supervisor I could not carry my personal weapon inside of headquarters. I informed him I had a concealed weapon permit. He stated I could not carry it inside of headquarters. Let it be known my supervisor is on permanent light duty and carries his personal weapon inside of the office.

83. On 09/15/2022, Sgt Williams who was briefly our supervisor informed us that if you were under investigation, you could not carry a firearm in the office.

84. On 11/01/2022, I walked into the office and observed Sgt. Douglas Howell carrying his gun and badge while he was under investigation for saying blacks and marijuana were problems in America. The local news did a story on him. During his entire investigation he was only taken off of the street so the public would forget about him. He was not suspended like I was for far

less and he was able to keep his police car and still work off duty. Again, there are two set of rules on this department for white males and everyone else.

85. On 01/26/2022, After being passed up to be in charge by all the males in the office who had far less time on and education than I did I asked my supervisor (white male), who was also just an officer, but because he was the Undersheriff's best friend he was allowed to be permanent person in charge with increased pay why I never got the opportunity to be in charge in his absence and his response was, "I did not know you wanted to be PIC". I informed him I did, and he never allowed me to like all the other males with less time on in the office.

86. 02/14/2022, Lt. Lestrangle was openly joking with his subordinates in the office like a child and talking about Officer Starling. He stated out loud he wished he could punch him, but now he's handicapped. He then laughed and said karma.

87. On 04/13/2022, My supervisor Officer Roberts, who is known for his offensive and open vulgar behavior in the office asked Officer Cook who he bullied on a daily basis if he lets the girl he was dating bully him because he wants to put his weenie inside of her. He said this out loud in front of Lt. Lestrangle. I was reading my book and looked up to see if he would correct his vulgar and offensive language and he laughed and never said a word.

88. On 05/01/2022, Lt Vandelinder walked into the office with a new haircut and my supervisor (Roberts) yelled out, "I would fuck you". Lt. Vandelinder never corrected this offensive language and they all laughed. I was uncomfortable with his language and behavior.

89. On 05/02/2022, Officer Cook spoke about going to take an allergy test. He then stated he had a list of stuff he could eat. My supervisor (Roberts) said out loud, "Is semen on this list"?

90. On 05/26/2022, My supervisor (Roberts) made a statement about an officer who was arrested for peeping in his ex-girlfriend's window, he said out loud in front of Lt. Lestrangle while the officer was peeping in her window did, they collect DNA? Lt. Lestrangle laughed and did not correct my supervisor's offensive language again.

91. On 06/25/2022, While standing by the front office door to leave my supervisor (Robert's) informed me that I belonged at home in the kitchen and laughed.

92. On 08/10/2022, My supervisor (Roberts) informed me to introduce someone to Officer Cook and tell them to touch his weenie.

93. On 09/26/2022, Officer Greene yelled at me in the office about calls for service. The supervisor (Roberts) never said a word. Let it be known I take as many calls as anyone else and documented them. My supervisor who was a working supervisor never took calls and sat all day watching shows, yelling out offensive and vulgar language, chewing and spitting dip, throwing darts and balls at male officer's penises and heads. No one ever said a word about it. There were not many of us in the office and we would get theft calls more than anything. Rather than have calls pile up I would take certain calls to prevent them from piling up. No call in the office was hard. On another occasion Officer Greene yelled at me again in front of everyone, but this time Lt. Anderson (Black male) was in the office and heard him and immediately came out and confronted him. Again, it has become common to speak to me anyway they wanted, and nothing ever happened.

94. While watching an interview of my supervisor (Robert's) he called me a bitch and the detective never corrected his language or said anything. This was another example of how he felt about me and had no fear of how he treated me.

95. On 10/24/2022, Due to my supervisor's childish behavior in the office and moving behind me I placed a mirror on my desk for my safety because he like to shoot metal and foam darts and throw balls at officers and I did not want to get shot "accidentally" in the back of my head. Lt. Lestrangle walked in and yelled at me in front of everyone. He stated officers complained and he accused me of watching officers in my mirror. There were 2 officers behind me, and they both stated they didn't say anything to him. My supervisor stated aloud that Lt. Lestrangle walked in, saw the mirror and complained himself and not them. So, this was proof again of Lt. Lestrangle retaliating, discriminating and harassing me.

96. On 10/26/2022, Lt. Lestrangle came into the office and yelled at me in front of everyone like I was a child when he observed my iPad on my desk. He accused me this time of recording officers and I was not. Because he gave me a direct order to remove my mirror off of my desk for my safety and comfort, I had my iPad on my desk so I could see behind me. It was not recording, and you could clearly see that.

97. Once again, I found myself still being passed up to be in charge when my supervisor was off. Officer Cook who had less time and education on the street than me was allowed to be in charge. My supervisor (Roberts) informed me that Officer Cook was on desk duty due to his mental and he would never get his gun back.

98. Several times over the last year and a half I have witnessed my supervisor (Roberts) bully Officer Cook on a daily basis. He made jokes about Officer Cook's mother. I have witnessed him throw metal darts at officers' penises and head which Lt. Lestrangle witnessed and never corrected this behavior. This is not behavior of a supervisor nor is it behavior for a working environment. I witnessed my supervisor shoot a metal dart at Officer Cook's penis so hard he informed me he was in so much pain he had to go to Urgent Care and pay for it out of his own

pocket. I witnessed my supervisor (Roberts) shoot a metal dart at Officer Cook's head that it actually stuck in his head. This is why I was so confused when Lt. Lestrage said he wanted officers to feel comfortable in the office which is why I could not have my mirror on my desk, but it was ok to speak vulgar and shoot and throw darts at officers and nothing happened. This is why I had my mirror on my desk because I knew what my supervisor (Roberts) was capable of doing and getting away with. Officer Roberts is a walking EEOC complaint. I have heard him say racist, sexist and vulgar things on a daily basis. I have witnessed him take his shirt off and straddle another male officer's lap in front of me. He openly made comments about gays as well and no one does anything because who he was close to. All of this is a hostile working environment that was never corrected by Lt. Lestrage. Once I filed my Internal complaints due to how I was being treated and being sexually harassed in the office on a daily basis Lt. Lestrage started coming in the office more to intimidate me. While Lt. Lestrage was under investigation he still had his gun, badge and car. He was not suspended for serious charges of what he allowed in the office. It is like my complaints did not matter. They were white males, and nothing happened. Lt. Lestrage did not even try to hide how he treated me because he knew nothing would happen. My Chief (Halyard) knew what I was going through and admitted to me I was working in a hostile environment.

99. Lt. Lestrage continued harassing, discriminating and retaliating against me. On 12/08/2022, a new memorandum was issued in reference to PIC training (Person In Charge). It stated it would go into effect on 02/02/23/. Officers would have to complete a 20-hour course in order to serve as a PIC. The dates for the class were 01/03/2023 to 01/04/2023, for blue squad and 01/05/2023 to 01/06/2023 for gold squad. It stated the following to be eligible:

Assigned by an Assistant Chief.

Have not received a Written Reprimand Level Two or higher disciplinary action in the previous 12 months.

Successfully complete probation.

No where in the eligibility requirements did it mention passing a physical agility test (PAT).

100. On 12/14/2022, I took the PAT and did not pass due to my legs cramping up.

101. On 12/15/2022, I received an email from my supervisor (Wilson) informing me at the direction of Lt. Lestrage I would not be able to attend the PIC class due to not passing the PAT. I responded back and asked why I was not able to attend the class since the memorandum clearly stated the class would be on 01/05 to 01/06, which was not on one of the makeup dates for the PAT on 01/04. I also informed her that per our FOP contract I had 30 days to take the PAT again and those dates were before my 30 days, and I would not be attending on those dates. I asked if that still disqualified me. I gave a list of reasons why it was not fair for me to be disqualified for not passing the PAT when no one else who signed up for the class even takes the PAT because they are either on Permanent light duty or Temporary light duty. Sgt Wilson informed me she would forward my concerns to Lt. Lestrage. My former supervisor (Robert's) who was under investigation and was not fired who said and did all of the vulgar and offensive things in the office was approved to sign up for the training which was a slap in the face. He was also allowed to be in charge still after everything he did and being under investigation until I complained about it.

102. On 12/19/2022, after receiving my concerns and obvious reasons why Lt. Lestrage could not prevent me from taking the class we received an email from Sgt. Wilson informing us no one would be attending the PIC class and to direct any and all questions to Lt. Lestrage. It also

stated no one would be assigned PIC in her absence and all reports had to go to the street. This was obvious Lt. Lestrangle was retaliating against me and knew Officer Roberts would not be allowed to be PIC anymore after my complaints and proof of how I was being treated.

103. On 12/19/2022, I sent my Chief (Halyard) an email informing him of what was going on and the blatant and unfair treatment towards me from Lt. Lestrangle, and how Officer Roberts was still allowed to be PIC after my internal complaint against him and Lt. Lestrangle. The fact that he was allowed to be in charge after everything he had done was a slap in my face and proved my concerns and how I felt did not matter.

104. On 12/20/2022, after my email to Chief Halyard informing him of what was going on I received an email from Lt. Lestrangle that I was chosen for the PIC class by my Chief. On this same date approximately 18 minutes later Lt. Lestrangle forwarded me an email he sent to Lt. Lee informing her that Officer Cook and I would actually like to attend the class now and apologized. This would mean that she was previously informed that we did not want to attend the training which was not true. I am assuming when I listed my concerns, and we were informed no one would be attending "someone" must have informed Lt. Lee no one wanted to attend the training. This is another example of blatant discrimination, vindictiveness, retaliation, and bullying I am receiving from Lt. Lestrangle.

105. A new rule came out in reference to being in charge. It stated you must have training, which Officer Roberts did not have because he was not allowed to go to training thanks to the Chief Halyard doing the right thing. In our office the PIC was always based on seniority until it was my turn then I was skipped. They allowed Officer Cook to be in charge over me even though he had less seniority and education than me. Again, this was Lt. Lestrangle's doing. So, the department did not think Officer Cook was fit to carry a gun and work on the street but was able

to be in charge to prevent me from being in charge. I was the only fully commissioned officer in the office. On 03/30/2023, our squad received an email from Sgt. Howell, the same supervisor who was under investigation about his comments about blacks and drugs. In the email he stated Officer Cook would be in charge in his absence once again skipping me. When Officer Roberts was in charge he was still in charge even when Sgt. Howell was in the office. They just hid Howell in the office until the public forgot about the racist comments he made. Suddenly he was in charge even though he wasn't before to prevent me from being in charge.

106. Fed up with how I was once again being treated I sent an email to Chief Halyard informing him of what was going on. He responded and informed me he would look into it. On 03/30/2023, I received an email from Lt. Lestrangle with a schedule with me and Officer Cook sharing PIC duties which was fair. On 04/05/2023, after continuous unfair treatment and Internal Affairs not helping, I wrote a letter to the Sheriff and Chief Halyard delivered it. After the Sheriff received my letter Chief Halyard sent out another email stating he changed his mind and Officer Cook would now be in charge whenever Howell was not there. This is obvious proof that Sheriff Waters and most likely the city's attorneys informed him to do this out of fear I would file a complaint publicly about Howell who they were hiding and protecting. It would not look good for the supervisor who made national news for making racist comments to prevent the black female from being in charge and also to protect Lt. Lestrangle who again got caught retaliating and discriminating against me openly.

107. On 04/06/2023, after a meeting with the FOP as soon as I drove out of the parking lot, I received a phone call from Chief Halyard informing me to come to HR on 04/07/2023. I asked him what the meeting was about, and he lied and stated he did not know. During my meeting with the FOP, they downplayed everything and did absolutely nothing to help me. The President

did state that if I did what Officer Roberts did, I would be fired. During the meeting the FOP'S attorney kept getting up and speaking with someone on the phone. He also did not read any of my complaints. He just looked at the pages without reading them and sat the complaints down. I called the Occupational Nurse in HR and asked her what my meeting was about so I could inform my attorney. She lied and stated I was not in trouble and the meeting had nothing to do with being punished. On 04/07/2023, when I walked into HR I sat down and spoke with the Occupational Nurse Stephanie Harris and Chief Goff, who is over HR. He informed me my police powers were being stripped because I filed too many internal complaints. Ken Palmer who works for the FOP informed me that my supervisor (Roberts) admitted he did what I complained about him doing in my internal complaint. I asked politely why I would be punished for asking for help. He informed me I also left my own personal weapon in the bathroom when the building was locked for the night and only employees were inside. I informed him I had a female emergency, panicked and ran out of the restroom and forgot it. Let it be known Detectives, Officers and Chiefs have forgotten their department issued weapons in the bathroom during the day when the building was open. Not once did they receive the punishment I received. There is no policy that states anything about forgetting your own weapon anywhere. I found a detective's gun in the same restroom suspects go to between interviews and nothing happened to her. I informed him security told me they find weapons all the time and it was never an issue. Lt Oldham was the commander in Internal Affairs when I found the Detective's gun in the restroom. He also informed me during the meeting I would not be getting in trouble for forgetting my own weapon in the restroom, but that was a lie because they wanted to get as much as they could to write me up to make me look bad. Chief Goff then went on to inform me I had to take a drug test immediately and another psychological evaluation. I asked politely why did I have to do all of

this because I asked for help? He had no answer and he and Ms. Harris got up and left the office. So now I am being punished for asking for help. My complaints have been legitimate and sustained. My supervisor admitted he did everything I complained about so this was another example of retaliation, harassment and discrimination. The department has cost me thousands of dollars by constantly suspending me for nothing. I have been held to higher standards than officers who have committed felonies, said and did racist things, falsified evidence and lied under oath and nothing happened. The department has put me in a situation where I cannot ask for help out of fear of retaliation. It's clear the Sheriff does not care, nor will he help me. He has yet to speak with me, in reference to my complaint and no investigation was never done. The department's way of protecting corrupt behavior is to never do an investigation so the corrupt officers will never have to answer questions under oath. That's the JSO way. The Jacksonville Sheriff's Office does nothing by the book until the public is aware of it.

108. I waited for months for the investigation that was pretty much open and shut to be finished. Officer Roberts was not fired, and Sgt. Eanes in Internal Affairs informed me nothing happened to Lt. Lestrangle for his blatant behavior towards myself. This was another example of how nothing happens to white males even with evidence and my cries for help were ignored.

109. On 04/05/2023, tired of the treatment against me, all my cries for help being ignored I wrote a letter to Sheriff Waters begging him for help. I informed him how I was treated and yelled at during a forced Internal Affairs interview at the last minute. I informed him I was not able to get my attorney at such short notice and the Union was a complete joke because they never did anything to help me. The email I sent to an internal detective was asking if it was against department policy for an employee to go to college classes while on duty and log out on calls as if they were still at work. This sparked an outrage in Lt. Dorner which is why he was so angry

and was yelling at me. When he came down to the office and informed me, I had to report to internal for an interview within the hour you could see on video he was moving his finger back and forth towards me as he spoke to me because he was angry about my question. His face was all red while he spoke to me. When I went for my interview, he continued yelling at me so much a detective came and pressed a button on the wall outside of the internal affairs door. Everyone knows everything in internal affairs is recorded. I would be a fool to lie about what happened in Internal Affairs during an interview. The whole point of the letter to the Sheriff was to prove how I had been treated by Internal Affairs and nothing ever happened. What I did not know was they would be so corrupt and not include the part in the video of me being yelled at by Lt. Dorner then fire me and said I lied about being yelled at. I was calm because I know what happened and it will be proven. They falsified evidence, set me up and fired me. They, then along with General Counsel presented altered evidence against me and they all lied under oath. My own attorney from the FOP did nothing to help me. He asked me who I wanted to testify during my hearing during my review board hearing. I informed him I wanted Lt. Dorner because that would prove everything I said if he had to answer questions under oath. In true form of protecting the white male he informed me I could not ask for him to testify. So, this continued what I have been saying all along of how they prevent certain people from having to answer questions under oath. My case could have been proven just by asking him certain questions and showing evidence and my own attorney knew this. This would have shown why he was so angry and yelling at me. During the hearing I was not allowed to show any of my evidence while the department showed their altered video and their falsified reports. When I went into Internal Affairs to pick up a video of one of my interviews Detective Green admitted to me in the office that is recorded at all times, as they stated under oath during my review board hearing, that another detective forgot to start

the beginning of the recording, which was the part where Lt. Dorner was yelling at me. When asked if she told me this during my Review Board Hearing under oath Detective Green lied. This will be proven at a later date. I requested a copy of the interview and was informed it did not exist. But everyone knows everything in that office is recorded. Again, they were caught lying under oath and preventing me from getting evidence against them to prove what I said. The Undersheriff (Coarsey) jumped on the bandwagon and openly lied on me during my review board hearing. He stated under oath that the missing person in my case was found where his wife informed me, he would be to make me appear to be incompetent and lazy. The victim was found when he was involved in a traffic crash later in the day. The Undersheriff had no issue just openly lying under oath. This was not a mistake and was done intentionally to defame my name and character. They did whatever they wanted with no fear of their criminal behavior. Everyone who testified against me at my review board hearing lied under oath and defamed my name and character. To prevent me from getting an "original" copy of my interview proving I was being yelled at and to give themselves time to alter it, I put in a public records request for a copy of the interview on 05/01/2023. Sgt Eanes lied and stated that there was no video. You can clearly hear him saying this on video when I was in the same recorded room that my interview was in and also the same room Detective Green admitted another detective forgot to start the recording at the beginning of my interview when I was yelled at. She then lied under oath during my review board hearing and stated she never told me that. Per contract when an officer is under investigation all evidence against them is made available to them immediately. I was denied all the evidence against me which is a violation. They did not give me the video until 07/17/2023, over 2 months later after it had been altered. Again, the department did not follow FOP contract nor FOIA laws.

110. My investigation uncovered corruption and coverup. The reason they did not want to give my friend a copy of the report when she requested it on 12/07/2020, was because years later after the report they added to the report to cover their tracks. When the investigation was over in 2017, I asked for a complete packet of the investigation. I sent an investigator (Glover) to get a copy of the report and realized why they wouldn't release a copy to her. They wrote another report years later and added to the case. The report printed out different from the original report due to the department changing formats, which is proof it was written years later. They also added something else to the case that had nothing to do with it to make the suspect look bad because they knew it might go public or someone might ask for a copy. Both officers lied on their use of force reports. They stated Officer Hiliman arrived on the scene prior to me. To make it look like I lied on my use of force report and ruin my credibility. The department could have arrested me if I falsified the report but did not because the CAD showed I was on the scene before Officer Hiliman. They should have fired him for falsifying the report, but again did nothing because he was a white male. On 02/26/2019, I sent an email to Lt. Restivo who was the Commander over Internal Affairs, informing him the investigation was fraudulent and that I arrived on the scene before Officer Hiliman. They wanted it to appear that I just showed up after everything happened, so it looks like I did not know what happened. Let it be known no use of force was used prior to my arrival on scene. I was there to witness everything. I was the third officer on the scene and saw everything. They could have easily pulled the CAD and saw who arrived on scene and when. They should have arrested both officers for excessive force and falsifying official documents both which are felonies. Instead, nothing happened to them, and I was retaliated against for years for doing the right thing and speaking up. If I was saying one thing and the other two corrupt officers were saying something different that should have been an investigation

to see who was lying which would have taken minutes by pulling up the CAD which I'm sure they did and knew they were lying, but instead did nothing and punished me and labeled me a liar. I am still wondering how the Jacksonville Sheriff's Office can conduct an investigation as serious as this and never call the victim in to get a statement. I have copies of the whole case and the victim was never called in to testify or anything. They never wanted to know the truth. They wanted to bury the truth and punish me for speaking up. It has now been 7 years of continued harassment, retaliation, living in fear, violating my civil rights and privacy and nothing has been done. The only one to suffer for the two white male officers almost killing a black victim is me and I stopped them from killing him.

111. I then looked up the case in CORE which is open to the public. My name was completely deleted from the case which is criminal. They did not want anyone reaching out to me for a statement. Another example of them covering their tracks. They charged him with crimes he did not commit to justify the butt whipping they gave him. He never used force and I am not sure how any State Attorney could read that report and justify the felony charge of resisting with violence. The victim was drunk and all he did was roll on the ground to prevent us from handcuffing him. Not once did he hit or kick anyone. He was just drunk. He never took the officer's radio. It fell out of the holster when he was violently kicking him continuously. During the investigation they did not talk to the family of the person that was involved in the traffic crash with the victim. This is because they did not want the truth. My investigation for petty complaints on body camera was 20 times longer than the investigation for excessive force and charging a victim with a crime he did not commit. I could hear the family screaming OH MY GOD as they watched how the victim was being beaten by the two white male officers.

112. This incident haunted me so much I reached out to Alice Speri, who is an investigator with The Interceptor who interviewed the victim. She informed me he stated everything I told her was true and he even told his attorney excessive force was used against him and the attorney informed him don't waste your time no one will believe you. His attorney had an ethical obligation to help his client and refused to help him. This victim never had a private attorney but suddenly had one for this case only. He always had a public defender. If a public defender had this case, they would have went public and this case would be a career defining case so I am not surprised he did not have a public defender for this case. The department could have asked the victim for his medical files and compared his injuries to what I told them the two white male officers did to him and knew I was being truthful, but again that would prove me correct and they wanted to sweep the incident under the rug.

113. Due to the department refusing to conduct a fare investigation for my numerous complaints and not conducting a proper investigation for the almost killing of a citizen has caused me severe emotional distress, chronic depression, constant living in fear of my life, defamed my name and character and wrongfully terminated me.

FIRST CAUSE OF ACTION - SEX/GENDER DISCRIMINATION

114. Plaintiff adopts and incorporates all previous paragraphs as if set forth herein.

115. Plaintiff is an employee within the meaning of Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e-2) and the Florida Civil Rights Act of 1992 (Fla. Stat. §§ 760.01-760.11) and belongs to the class of employees protected under these statutes, namely, female.

116. Defendants are employers within the meaning of Title VII and are engaged in an industry affecting commerce, having fifteen (15) or more employees for each working day in each of twenty (20) or more calendar weeks in the current or preceding calendar year.

117. Defendants discriminated against Plaintiff because of her gender/sex in violation of Title VII (42 U.S.C. § 2000e-2(a)(1)) and the Florida Civil Rights Act (Fla. Stat. § 760.10(1)(a)). Specifically, Defendants investigated, wrote up, and disciplined Plaintiff for infractions for which male employees were not investigated, written up, or disciplined.

118. Plaintiff was subjected to interrogation, write-ups, harassment, and discipline while male employees engaging in far more egregious conduct were not subject to investigation, harassment, or ridicule.

119. A different set of performance rules was applied to Plaintiff than to white male employees conducting similar job duties. White men were allowed to act in any manner without fear of discipline, demotion, or termination and were allowed to promote or transfer units without fear of discrimination or retaliation.

120. Plaintiff suffered adverse employment conditions, including being placed on disciplinary proceedings, denied the opportunity to transfer or promote, and ultimately being terminated for exercising her rights to be free from discrimination in the workplace.

121. Plaintiff was subjected to discriminatory and hostile treatment by her supervisors, including various elected Sheriffs during her employment with JSO. This treatment created a hostile work environment.

122. But for her sex (female) and race (black), Plaintiff would not have been targeted for discrimination and subjected to adverse employment actions.

123. As a result of Defendants' conduct, Plaintiff endured a hostile work environment, was overlooked for overtime, positions, and promotions for which she was otherwise qualified, and was forced into retirement to escape the discriminatory and hostile work environment.

124. Plaintiff has lost wages and benefits, suffered emotional distress and mental anguish, and sustained damage to her reputation and career.

125. Plaintiff has been injured in an amount in excess of \$75,000.00 and is entitled to judgment against the Defendants for their wrongful conduct.

126. Defendant's conduct constitutes unlawful discrimination on the basis of sex in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2(a)(1). Specifically, Defendant discriminated against Plaintiff by subjecting her to differential treatment, harassment, and adverse employment actions based on her sex.

127. Defendant's conduct violates the Equal Pay Act of 1963, 29 U.S.C. § 206(d), by paying Plaintiff less than male employees for substantially equal work under similar working conditions.

128. Defendant's actions also violate the Florida Civil Rights Act of 1992, Fla. Stat. § 760.10(1)(a), by engaging in unlawful employment practices based on Plaintiff's sex. Specifically, Defendant discriminated against Plaintiff by investigating, disciplining, and subjecting her to adverse employment actions while not taking similar actions against male employees.

SECOND CAUSE OF ACTION RACIAL DISCRIMINATION

129. Plaintiff adopts and incorporates all previous paragraphs as if set forth herein.

130. Plaintiff is an employee within the meaning of the Title VII and the Florida Civil Rights Act and belongs to the class of employees protected under the statute, namely, black or African American.

131. Defendants are employers within the meaning of the Title VII and the Florida Civil Rights Act and are engaged in an industry affecting commerce; and have fifteen (15) or more employees for each working day in each of twenty (20) or more calendar weeks in the current or preceding calendar year.

132. Defendants discriminated against Plaintiff because of her race black in violation of the Title VII and the Florida Civil Rights Act by investigating, writing up and disciplining only Plaintiff for infractions that white male employees were not investigated, written up or disciplined over.

133. A different set of performance rules were placed upon Plaintiff than upon others namely white males for conducting themselves in their job duties.

134. White men were allowed to act in any manner without worry of discipline, demotion or termination from the superiors and were allowed to promote or transfer units without fear of discrimination or retaliation.

135. Plaintiff suffered adverse conditions of employment in that she was placed on disciplinary proceedings, she was not allowed to transfer or promote and then she was ultimately fired for exercising her rights to be free from discrimination in the workplace.

136. But for her sex female and race black, Plaintiff would not have been targeted for discrimination and suffered adverse employment action.

137. Plaintiff was subject to discriminatory and hostile treatment by her supervisors, including the various elected Sheriffs during the time of her employment with JSO.

138. As a result of the conduct by Defendants Plaintiff was forced to endure a hostile work environment, were overlooked for overtime, positions, and promotions for which each was otherwise qualified for and is being forced into retirement to escape the discriminatory and hostile work environment.

139. Plaintiff has lost wages and benefits, suffered emotional distress and mental anguish, and have sustained damage to her reputations and careers.

140. Plaintiff has been injured in an amount in excess of \$75,000.00 and is entitled to judgment against the Defendants for their wrongful conduct.

THIRD CAUSE OF ACTION HOSTILE WORK ENVIRONMENT

Plaintiff adopts and incorporates all previous paragraphs as if set forth herein.

141. Plaintiff is an employee within the meaning of the Title VII and the Florida Civil Rights Act and belongs to the class of employees protected under the statute, namely, female.

142. Defendants are employers within the meaning of the Title VII and are engaged in an industry affecting commerce; and have fifteen (15) or more employees for each working day in each of twenty (20) or more calendar weeks in the current or proceeding calendar year.

143. Defendants discriminated against Plaintiff because of her gender/sex in violation of the Title VII by investigating, writing up and disciplining only Plaintiff for infractions that male employees were not investigated, written up or disciplined over.

144. Plaintiff was subject to interrogation, write ups, harassment, and discipline when Male employees engaging in far more egregious conduct were not subject to investigation, harassment, and ridicule.

145. A different set of performance rules were placed upon Plaintiff than upon others namely white males for conducting themselves in their job duties.

146. Plaintiff was forced to work in a highly sexually charged environment.

Her male coworkers would make constant "comments" and "jokes" about sex and sexuality in her presence.

147. White men were allowed to act in any manner without worry of discipline, demotion or termination from the superiors and were allowed to promote or transfer units without fear of discrimination or retaliation.

148. Plaintiff suffered adverse conditions of employment in that she was placed on disciplinary proceedings, she was not allowed to transfer and then she was ultimately fired for exercising her rights to be free from discrimination in the workplace.

149. But for her sex female and race black, Plaintiff would not have been targeted for discrimination and suffered adverse employment action.

150. Plaintiff was subject to discriminatory and hostile treatment by her supervisors, including the various elected Sheriffs during the time of her employment with JSO.

151. Plaintiff was subjected to a hostile work environment as a result of the reporting of the failures of other Officers working at the JSO.

152. Plaintiff was targeted and harassed making the working environment hostile and unbearable by her male co-workers who created an environment where it was impossible for Plaintiff to perform her job duties.

153. Defendant JSO has discriminated against Plaintiff and adopted, enforced, and encouraged a hostile working environment at JSO.

154. The Senior Staff members have engaged in a pattern and practice of outrageous conduct towards Plaintiff.

155. Defendant JSO is directly liable because it was negligent in discovering and remedying the discriminatory conduct.

156. The Plaintiff reported the conduct and complained on multiple occasions and JSO has failed to take action. Instead of investigating the wrongdoing that the Plaintiff reported, the Defendants supported the various officers within JSO that turned on her.

157. The conduct is severe and pervasive, happened openly and notoriously, and JSO by and through Waters and the other previously elected Sheriff's and other Senior Staff Members ignored the conduct.

158. Plaintiff was subjected to discriminatory and hostile treatment by her supervisors, including the various elected Sheriffs during the time of her employment with JSO.

159. Defendant JSO has failed to correct these actions despite Plaintiff's complaints regarding them. As a result of the conduct by Defendants the Plaintiff was forced to endure a hostile work environment, was overlooked for increased pay, positions, and promotions for which each was

otherwise qualified for and was wrongfully terminated which forced her into retirement to escape the discriminatory and hostile work environment.

160. Plaintiff has lost wages and benefits, suffered emotional distress and mental anguish, chronic depression, and have sustained damage to her reputations and career.

161. Plaintiff has been injured in an amount in excess of \$75,000.00 and is entitled to judgment against the Defendants for their wrongful conduct.

FOURTH CAUSE OF ACTION RETALIATION

162. Plaintiff adopts and incorporates all previous paragraphs as if set forth herein.

163. Plaintiff is an employee within the meaning of the Title VII and belongs to the class of employees protected under the statute, namely, female and black or African American.

164. Plaintiff exercised her right to be free from discrimination in the workplace by making reports of violations of Title VII and the Florida Civil Rights Act.

165. Plaintiff also exercised her right and obligations to protect the United States and Florida Constitution by bringing Law Enforcement Wrongdoing to the attention of the appropriate authorities.

166. After her first report to the EEOC plaintiff continued to report conduct to the EEOC when the Defendants would retaliate against her.

167. Plaintiff filed 4 separate charges of discrimination during her employment with the JSO and the City of Jacksonville. Plaintiff was terminated 21 days after filing her 4th charge.

168. A fifth charge of discrimination was filed after the termination of her employment.

169. Because of the Plaintiffs continued reports the EEOC investigation went on for over 2 years from February of 2021 through August of 2023.

Every time the Plaintiff exercised her right to be free from discrimination and/or retaliation by reporting malfeasance within the JSO she was again targeted by her superiors and co-workers for asserting her rights to be free from discrimination.

170. Plaintiff was subject to discriminatory and hostile treatment by her supervisors, including the various elected Sheriffs during the time of her employment with JSO.

171. As a result of the conduct by Defendants Plaintiff was forced to endure a hostile work environment, were overlooked for overtime, positions, and promotions for which each was otherwise qualified for and is being forced into retirement to escape the discriminatory and hostile work environment.

172. Plaintiff has lost wages and benefits, suffered emotional distress and mental anguish, and have sustained damage to her reputations and careers.

173. Plaintiff has been injured in an amount in excess of \$75,000.00 and is entitled to judgment against the Defendants for their wrongful conduct.

FIFTH CAUSE OF ACTION - VIOLATION OF 42 USC §1981

174. Plaintiff adopts and incorporates all previous paragraphs as if set forth herein.

175. Plaintiff is an employee within the meaning of the Title VII and belongs to the class of employees protected under the statute, namely, black.

176. Plaintiff has a contract for employment with the Defendants JSO and the Consolidated City of Jacksonville, Duval County Florida.

177. Plaintiff was a member of the Fraternal Order of Police (FOP) and subject to a collective bargaining agreement (CBA).

178. Plaintiff was denied her benefits of membership in the FOP by her treatment by the JSO.

179. Plaintiff was fired in violation of the CBA and but for her being black the Defendants would have complied with the duties and obligations under the CBA to perform appropriate investigations prior to her termination.

180. Had the appropriate investigations been conducted, Plaintiff would not have been fired.

181. Plaintiff was subject to discriminatory and hostile treatment by her supervisors, including the various elected Sheriffs during the time of her employment with JSO.

182. But for discrimination against Plaintiffs race and sex she would have had continued employment with the JSO and the Consolidated City of Jacksonville and Duval County Florida.

183. As a result of the conduct by Defendants the Plaintiff was forced to endure a hostile work environment, was overlooked for overtime, positions, and promotions for which each was otherwise qualified for and is being forced into retirement after being wrongfully terminated to escape the discriminatory and hostile work environment.

184. Plaintiff has lost wages and benefits, suffered emotional distress and mental anguish, chronic depression, and have sustained damage to her reputation and career.

185. Plaintiff has been injured in an amount in excess of \$75,000.00 and is entitled to a judgment against the Defendants for their wrongful conduct.

Jury trial demanded.

WHEREFORE, Plaintiff Monica Bennett prays that Judgement be granted in her favor and against the Defendants. Plaintiff further requests that she be awarded an amount in excess of \$75,000 to be determined by a jury for her lost wages and benefits of employment along with pain and suffering and inconvenience and attorney's fees and costs as allowed by law.

Respectfully submitted,

Monica Bennett Pro Se Litigant

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of July 2024, I served a copy of the foregoing on
Laura Cauley Boeckman at lboeckman@coj.net.

Monica Bennett

Pro Se Litigant