

EX ALDERMAN NEWSLETTER 48

March 20, 2012

By John Hoffmann

AL GERBER LIES TO THE PUBLIC: Last week Al Gerber sent out a rambling campaign letter trying to hold on to his seat on the Board of Alderman. He attacked his opponent with one of the BIGGEST AND FATTEST LIES I have read in recent years. What truly amazed me was that Gerber did not immediately know that what someone was telling him as fact could not have happened.

THE LIE: Gerber claimed that when Chuck Lenz was on the Board of Aldermen Lenz promoted widening Mason Road to four lanes so tractor trailers could get to Wal Mart.

THE TRUTH: Lenz never prompted such an idea. Mason Road is a COUNTY ROAD controlled by St. Louis County. Nothing about this road would come up before the Town and Country Board of Aldermen for discussion or vote.

SMALLER LIES: Al claimed the capital improvements fund was for major “permanent improvements such as buildings.” In fact the city in the last two budgets that Gerber voted for included such none permanent items under Capital Improvements as police cars, phone and computer equipment and gasoline.

DUMB AND DUMBER: The amazing thing is that Gerber would write such a thing. He should know that Mason Road is a County Road because his condo is on Mason Road. Gerber is showing how uninformed and desperate he is to hold onto his seat. Where did he get such an idea? If I hazard a guess I would saw city deer lover, goof-ball and gadfly, Mariette Palmer or someone from Palmer’s group of followers.

PARKING AND LONGVIEW PARK: On Monday March 19, the St. Louis County Municipal Parks Grants Commission met at the Creve Coeur City Hall. These people get a slice of the Greenway Trials and Parks sales tax. It is the same sales tax they want to raise to pay for improvements at the Arch grounds.

SECRET, SECRET, SECRET: Hank Vogt, who was a member of the Longview parking Committee and who voted against increasing parking at Longview Park, had contacted me about the meeting and I included in our last newsletter.

Over the weekend I went to the Municipal Parks grants Commission's website and found a few photos of some of the members and photos of some of the Advisory Committee members. I found that last year the commission gave grants totaling \$2,727,349 and used \$58,990 in administrative

Here is what I didn't find: These people are second only to the Veiled Prophet on not wanting anyone to know who they are. They have a website, but here are some of the things that are not on the website:

When and where the next meeting is scheduled to be held

The agenda for the meetings

Minutes from past meetings

The commission allowed comments. Prior to the public comment several pieces of correspondence of more opposition was handed out to the commission members and was promptly ignored.

In attendance were former mayor and parking committee chair Skip Mange, Alderwoman Lynn Wright, City Administrator John Copeland, Alderman Steve Fons, Alderman Al Gerber, who sat in the back and didn't say a word, Gerber's wife, who arrived late and sat in the front and didn't say a word, Mariette Palmer, parking committee member and Wheatfield subdivision resident Hank Vogt, myself and two reporters.

The message from the Mount was delivered by Skip Mange, who as usual used selective information. He talked about all the days in 2010 that the parking lot was full (100 days) but didn't mention it was only full 5 days in 2011 with all being connected to the city allowing Mo Baptist Hospital to use the Longview House for business seminars and health screenings. Mange also said the added parking would make the entrance safer by reducing view obstruction of the sidewalk on Clayton Road.

Mange also claimed that the petition against expanding the parking used inflammatory and questionable working. The commission chair Trudy Hoey had asked for speakers to try and hold it to three minutes. Skip went about 10 minutes. Hoey asked if there were

any questions and not one commissioner even blinked. Steve Fons spoke in opposition and no one asked a thing.

Next Hank Vogt spoke in opposition to the grant being given and to the large amount of public opposition to the proposal including that voiced at the public forum where 17 of 19 speakers were against expanding the lot, Board of Aldermen meetings were public comment was overwhelming against the project and a petition signed by over 117 people. When Vogt was done, Commissioner Dennis Novak, former mayor of Ellisville asked Vogt an amazing question. "How many people live in Town and Country?"

Vogt replied about 10,500. Novak then said 19 people at a forum and 117 signing a petition does not represent 10,500. I wonder why the city bothered to mail a notice of the public forum to every house in T&C and then ignore the wishes of the large majority who spoke. Apparently that is the way it is done in Ellisville.

COMMISSION DOESN'T WANT INPUT FROM THE PUBLIC: Novak then lectured Vogt and Steve Fons on the purpose of the meeting. He said how the Commission doesn't consider input from the public. He added that is done at the local level by elected officials. Novak and then another commissioner Jim Brasfield both said the commission was created by the municipalities and was not the place for citizens to bring their concerns or complaints. That should be done at the local level.

"This is a county wide commission. When we get an application from a municipality we have a criteria that we use, how the county money should be spent wisely. Quite honestly, if there are any issues with how the money is spent, they are usually resolved within that municipality before it comes to us," Novak added. "If there is a problem with what is submitted to us, it needs to be handled at the municipal level. If this is approved, this goes back to Town and Country."

Apparently all you have to do to get a grant is apply for it. This Commission does not look and see if your application is worthy to have tax money spent on it.

I spoke and asked "**Why do you exist?**" I added it was insulting to think a public commission is telling the public that it doesn't want its input. I then went down and explained in eight areas where Marge's statement was misleading. I especially hit on the "view obstruction" Marge referred to.

The View Obstruction is the stone monument the city built at the drive and sidewalk. It obstructs exiting driver's views to the sidewalk. I asked if the purpose of issuing grants using tax money should be to fix the mistakes of Town and Country or should Town and Country fix it themselves. Town and Country created the view obstruction and now instead of fixing it they are asking the commission to do so.

Chairwoman Hoey asked if anyone thought the Town and Country application should be tabled until their next meeting. The question was met with silence.

After me Mariette Palmer read one of her rambling letters against the parking expansion. She called Longview "our beloved park." In the past she referred to Mayor/Cigarette Lobbyist John Dalton as "our beloved mayor." Oddly enough her "beloved mayor" is the one pushing Skip Mange to justify paving more of her "beloved park."

The Commission then shut off public comment. They then read seven other grant applications from seven other cites and without discussing the merits of any of them. They then voted to approve all of them.

The meeting ended after about one hour and 15-minutes. It would have been way under the 60-minute mark. If no one from Town and country had showed up the whole thing would have been over in about 40 minutes.

After the meeting Dennis Novak told me that public comments were "not applicable" for the commissioners to make a decision or even consider.

The commission hired the administrator of the St. Louis County Municipal League to run the commission. In other words municipalities hired themselves to dole out tax money to themselves! What a racket!

SIGNS,SIGNS,EVERYWHERE THERE ARE SIGNS: Tuesday was the first day for local election signs to go up. Apparently Skip Mange is indiscriminately putting up signs. I saw one of his signs in a yard of a women on Clayton Road, who I know doesn't want to be associated with anyone running for office. Two hours later when I drove by the sign was gone. I also noticed a Mange sign in the backyard /Clayton Road street easement of mayor Dalton's house. Dalton owes Mange for distorting the truth on the Longview parking Issue. A sign is the least he can do. Another Mange sign is up at John Diehl's yard.

POLICE COMMISSION MEETING: The last police commission for the term of Chairwoman Nancy Avioli, who decided not to run was held on Tuesday. She stated what has been true for over three years. Her job at Monsanto as a corporate international lawyer keeps her from attending meetings. Too bad Nancy wasn't willing to admit this in 2010. That would have allowed Maria Peron to have been the Ward 1 alderwoman. Instead here in 2012 two kooks, Skip Mange and Dorothy Cooke are running.

DOROTHY ROGERS HIT A NEW ALL TIME LOW: On the agenda was ordinance updates to match changes in state law. One of changes is to substitute the word "accessible" from "handicapped" in the Parking for Physically Disabled ordinance.

Capt. Gary Hoelzer was explaining the change. Keep in mind, Hoelzer and his wife have adopted and are raising special needs children.

Dorothy Rogers asked this question and I am not making this up: "Is this just another deal where they can't use the word retard."

Hoelzer didn't answer her. Rogers has never been qualified or belonged on this commission. Shortly after making her comment Police Chief John Copeland gave Rogers an award for serving on the Police Commission for 13 years. This is a community wide disgrace that John Dalton continues to reappoint her.

LAST TOWN AND COUNTRY FEMALE POLICE OFFICER FILES SUIT AGAINST CITY OR... HOW CHRISTMAS CAME IN MARCH OF CITY ATTORNEY STEVE GARRETT... OR HOW THAT \$23,000 GENERAL FUND EXCESS FOR 2012 IS NOW A DEFICIT: Women police officers first were hired in St. Louis County back in 1973. I knew several of the officers, including Cynthia Golden, who eventually reached the rank of lieutenant and Casey Carter, the daughter of former bowling legend Don Carter, who became a detective before ending her career. They broke through and led the way. You would think by now police departments would have 20-40 percent woman officers.

In the case of Town and Country since 2010 there have been no female officers. Prior to that there was just one. That one was Shannon Woolsey, who in 2010 quit. She filed suit last week claiming sexual harassment. Her petition has rather detailed examples of the sexual harassment. She names "names" and one of the names is a supervisor that both myself and a neighbor of mine would routinely see meeting a girlfriend in Queeny Park. My neighbor jogging would see the sergeant before sunrise with the girlfriend in the marked police SUV. I'd see them in the late evening when I was walking the dogs.

After reading the petition it is all pretty familiar stuff that I had witnessed as a cop. I would have to guess that over half of the allegations seem very believable. A smaller portion of the lawsuit seems like whining, but you have to wonder why the city is not trying to hire more women for the police force.

One of the reasons that the T&C police force is not going to have many woman officers anytime soon is the shifts they work. Patrol officers work 12 hour shifts. I have never liked 12 hour shifts for liability reasons. When working three or four days straight on 12 hour shifts fatigue will set in. Sometimes it is when the officer is working at the end of a shift. Often the officer is simply fatigued in general after 3-days and is tired for the time they start the shift until it ends.

However woman, who are married and/or have kids have a really tough time spending 30-40 minutes round trip driving to work, showing up 15 minutes early before hitting the streets. Suddenly you are actually working a 13-hour day.

Here is the petition. BE ADVISED PARTS OF IT ARE X-RATED.

SHANNON WOOLSEY,
Plaintiff,

Comes now plaintiff Shannon Woolsey, by and through her attorneys, and for her Petition for Damages against defendant City of Town and Country states as follows:

1. Plaintiff Shannon Woolsey is a female citizen of the State of Missouri.
2. Defendant City of Town and Country ("Town and Country") is a municipality located in St. Louis County, and is a body politic organized pursuant to the Constitution and laws of the State of Missouri.
3. Venue in this Court is proper pursuant to Mo. Rev. Stat. g 508.101(2) and (6), and Mo. Rev. Stat. § 213.111.1.
4. At all times relevant herein, defendant Town and Country maintained an office or agent for the transaction of its usual and customary business in St. LOUIS County.
5. At all times relevant to this action, defendant Town and Country was an employer within the meaning of Mo. Rev. Stat. § 213.010(7), in that defendant employed or employs six or more persons within the State of Missouri and is a political subdivision of the State of Missouri
6. Plaintiff was employed by defendant as a police officer starting on or about April 16, 2001 to on or about May 1, 2011.
7. At all times during her employment, plaintiff performed the duties of her job in a

satisfactory manner. In 2008, Plaintiff received an award of excellence from the St. Louis County Police Critical Incident Team for her response to a situation involving a mentally ill subject.

8. Throughout most of her employment with Town and Country, plaintiff was the only female police officer in the department.

9. During plaintiff's employment, including the period within 180 days of the filing of her charge with the Missouri commission on Human Rights, plaintiff was subjected to unwelcome and offensive sexual remarks directed at plaintiff by other police officers. Such remarks include but are not limited to:

- a) "why don't you scratch your throat my dick itches";
- b) asking plaintiff how she liked her husband to touch her;
- c) "shut your man pleaser";
- d) asking plaintiff whether she had performed oral sex on the chief of police;
- e) "we like dirty girls"; and
- f) instructions to plaintiff to think of pulling the trigger on a gun like having sex.

10. During plaintiff's employment, including the period within 180 days of the filing of her charge with the Missouri commission on Human Rights, officers and supervisors made sexually suggestive comments in plaintiff's presence. Such comments include but are not limited to:

- a) repeated discussions of the size of one officer's penis;
- b) discussions regarding officers' sex lives, some of which included sexual encounters in a squad car;
- c) talk of strippers and the "shower scene" at the strip club Roxy's in East St. Louis;
- d) repeated use of the word "man-gina";
- e) references to the vaginas of teenage girls that officers would encounter in their daily duties; and
- D talk of masturbation, internet pornography and pornographic websites.

11. During the course of plaintiff's employment, plaintiff was present on multiple occasions when officers made statements that women should not be in police work.

12. Several times throughout 2002, plaintiff complained to supervisors that she was being treated differently than male officers. In particular, plaintiff believed she was harshly criticized for actions that she had seen male officers undertake without criticism. No investigations or remedial actions were undertaken in response to plaintiff's complaints.

13. On or about September 21, 2003, while on duty, plaintiff's supervising sergeant chip Unterberg, told plaintiff that he and plaintiff were obviously attracted to each other and should meet for sex once a month.

14. On or about October 29, 2003, plaintiff reported Sgt. Unterberg's conduct, including other sexually explicit and derogatory comments that he had made to plaintiff, to Capt.

Gary Hoesler and Lt. Robert Arthur. Plaintiff was asked to write out a brief statement of the incident and was told that Lt. Rick Kranz, the department designee to handle claims of sexual harassment, would investigate. On information and belief, Lt. Kranz was a good friend of Sgt Unterberg. Capt. Hoesler and Lt. Arthur assured plaintiff that the investigation would be kept confidential and someone would go over the final report with her.

15. On information and belief, as a result of the investigation, Sgt. Unterberg was suspended for one day and had to attend a class on sexual harassment training.

16. On or about November 1, 2003, plaintiff began being shunned by nearly all the other officers in the department, indicating to her that news of the investigation into Sgt. Unterberg had leaked. Additionally, at or around that time Officer John Nienhaus called plaintiff at home to ask about the investigation into Sgt. Unterberg.

17. Plaintiff complained to Capt. Hoelzer that plaintiff had been living a nightmare of retaliation while all Sgt. Unterberg got was a slap on the wrist. No one went over the final report of the investigation with plaintiff.

18. Following her reporting of Sgt. Unterberg's sexual advances and other comments and behavior to supervisors, Plaintiff began to experience what she believed were acts of retaliation. She reported these incidents to superior officers. These incidents included. but are not limited to:

a) defacement of a nameplate on the wall recognizing plaintiff's perfect attendance record;

b) the envelope containing plaintiff's paycheck being opened in her mailbox; and

c) a box containing clothing from the uniform shop meant for plaintiff had a face drawn on it and the face had been stabbed repeatedly with a knife.

19- On numerous occasions in 2004, plaintiff complained to superior officers that the investigation into Sgt. Unterberg clearly had not been kept confidential and that as a result she was being shunned and retaliated against. Plaintiff was told that nothing could be done and to wait for time to pass for things to get better.

20. On or about June 18, 2004, plaintiff was sent home for not qualifying with rifle and forced to use ten (10) hours of vacation time until she was able to qualify. On information and belief, male officers who failed to qualify with firearms were not sent home or forced to use vacation time until they qualified.

21. On or about October 14, 2004, plaintiff applied for a position in the Community Affairs Division. The position was very desirable because it involved regular working hours and an opportunity to learn other aspects of police work. Plaintiff was not selected for the position.

22. On or about November 15, 2006, plaintiff reported to superior officers that the sealed, confidential fitness assessment report left in plaintiff's mailbox had been opened by someone. Plaintiff received no response to this complaint.

23. At some point in 2007, Sgt. Steve Nelke yelled at plaintiff in front of other officers when plaintiff objected that he allowed a less senior officer to pick days off before plaintiff picked her days off. when plaintiff phoned Sgt. Nelke about the outburst he hung up on her. Plaintiff explained the situation to Lt. Kranz who, on information and belief, relayed the

incident to Capt. Hoelzer. Plaintiff complained to Capt. Hoelzer that the department seemed amenable to Sgt. Nelke yelling at her and hanging up on her. Plaintiff noted that when she had a supposed outburst in the past she had been referred to the Employee Assistance program for counseling. Capt. Hoelzer said that plaintiff could file an official complaint. Plaintiff pointed out that if she filed a complaint she would be retaliated against and labeled a "troublemaker," but if no action was taken then the male officers would simply run over plaintiff. On information and belief defendant never undertook any corrective or remedial action in response to Sgt. Nelke's outburst toward plaintiff.

24. Plaintiff applied for assignment to the detective bureau three times. Each time she was denied the position and the position was awarded to a male officer. The last two times plaintiff applied, the officers who received the positions had less seniority than plaintiff. Capt. Hoelzer had informed the department that officers who had not already been in a special unit would get precedence over those who had already been assigned to such units. Plaintiff had not been in a special unit. In 2008, the final time she applied for the detective bureau, a male officer who had already been assigned to a special unit received the position.

25. On or about July 7, 2010, plaintiff reported to Sgt. Chuck Frohock that officers were complaining that they did not want to be plaintiff's "tow bitches." The officers were referring to how back up officers had to wait for a tow truck on arrests because by policy the department towed an arrested person's vehicle. At the time, plaintiff was assigned to a vehicle with an expensive recognition system used to gather intelligence. On information and belief, other officers had been un-assigned from the vehicle due to the fact that they were not utilizing the equipment to make enough arrests. Plaintiff was told to ignore the comments.

26. In August 2010, plaintiff applied for a position in the newly formed Special Operations Squad (known as "E Squad"). This was a desirable position due to better hours and it would allow the opportunity to gain experience in a variety of areas beyond patrol. Plaintiff was not selected for E Squad. Male officers with less seniority and training than plaintiff were selected for one or more of the positions on E Squad

27. On or about October 19, 2010, plaintiff asked Lt. Arthur about not being selected for E Squad. Lt. Arthur told plaintiff that negative comments about plaintiff from other officers were part of the basis for the decision.

28. On or about October 23, 2010, Lt Nelke assigned plaintiff to work permanent midnight shifts on a squad led by Sgt. John Flanagan. Plaintiff had requested on multiple occasions to not be assigned to Sgt. Flanagan's squad because he had previously harassed her. After the assignment, plaintiff expressed to Lt. Nelke her desire to work for the other midnight supervisor. when Lt. Nelke would not change his mind, plaintiff complained to Lt. Arthur. Lt. Arthur told plaintiff that it was Lt. Nelke's decision. Plaintiff asked if she should bring this matter to Capt. Hoelzer's attention and was told that the captain was aware of and supported the decision. Plaintiff concluded that it would be useless to further pursue the matter.

29- on or about November 16, 2010, plaintiff was told to report to the shooting range to qualify again. Plaintiff had met the department standards for firearms qualification the previous week. The head firearms instructor told plaintiff there was a new policy, and that if plaintiff did not qualify under the new policy then she would have to use vacation/comp time, get

outside coaching and not return until she was able to satisfy the new policy. Plaintiff knew of no other officer who had to satisfy this "new" policy. Plaintiff was never shown the written policy.

30. At some point during the time period 2009-2010, a Town and Country police officer emailed a picture to plaintiff's cell phone. The image was of men and women engaging in an orgy involving not only sex but also other offensive acts. The officer told plaintiff that the image had been circulating around the department.

31. On the evening of February 28, 2011, plaintiff's sergeant, John Flanagan, called Plaintiff into a meeting in the sergeant's office. Plaintiff, Sgt. Flanagan and Cpl. Moore (both of whom were Plaintiff's supervisors) were present at the meeting. Sgt. Flanagan and Cpl. Moore verbally berated, intimidated, threatened, bullied and ridiculed Plaintiff for seven hours. They yelled at plaintiff for leaving the meeting to go to the bathroom, and after that point plaintiff felt that she could not leave the office. Throughout the interrogation, Sgt. Flanagan and Cpl. Moore criticized plaintiff's performance as an officer and discussed her 2003 sexual harassment complaint against Unterberg.

32. Immediately following this meeting plaintiff felt physically ill with a severe headache, chest pain, nausea and dizziness. After several days plaintiff continued to experience physical symptoms and sought treatment through her primary care physician. Plaintiff received a medical note to be absent from work.

33. On or about May 1, 2011, plaintiff resigned from her position with Town and Country.

COUNT I

SEXUAL HARASSMENT IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

34. Plaintiff re-alleges paragraphs 9-15, 17-18, 22-23, 25, and 28-33, as fully set forth herein.

35. Venue in this Court is proper pursuant to Mo. Rev. Stat. § 509.101(2) and (6), and Mo. Rev. Stat. § 213.111.1.

36. The unwelcome and offensive remarks and conduct to which plaintiff was subjected were based on plaintiff's sex, and were sufficiently severe and pervasive so as to alter the terms and conditions of plaintiff's employment and create a hostile or abusive work environment, in violation of the Missouri Human Rights Act, Mo. Rev. Stat. § 213.055

37. The above unwelcome remarks and conduct constituted sexual harassment against plaintiff.

38. Plaintiff complained to management about the unwelcome and offensive conduct and remarks directed to her.

39. Defendant Town and Country did not take prompt and effective corrective action to prevent and stop the sexual harassment of plaintiff.

40. Plaintiff timely filed charge number FE-4/11-14679 with the Missouri Commission on Human Rights ("MCHR") alleging sexual harassment, sex discrimination and

retaliation.

41. On December 19,2011, the MCHR issued a Notice of Right to Sue for the above charge number. A copy of the Notice is attached hereto as Exhibit I.

42. Plaintiff has filed this lawsuit within 90 days of the date of the above Notice and within two years from the last act of sexual harassment.

43. As a result of defendant's actions, plaintiff has been constructively discharged and has sustained lost wages and benefits of employment.

44. As a result of defendant's actions as set forth above and as set forth in Counts II , and III below, and defendant's failure to take prompt and effective corrective action, plaintiff has suffered emotional distress.

45. As a result of defendant's actions and failure to take prompt and effective corrective action, plaintiff has incurred, and will continue to incur, attorneys' fees and costs of litigation.

46. Defendant's conduct was outrageous because of defendant's evil motive or reckless indifference to the rights of others, and therefore, an award of punitive damages against defendant is appropriate.

WIIER-EFORE, plaintiff prays that this Court, after trial by jury, enter judgment for Plaintiff and against defendant in an amount to exceed. \$25,000.00, for plaintiffs economic losses, including plaintiffs lost wages, including prejudgment interest, and front-pay and/or reinstatement, for compensatory damages, including damages for emotional distress; for punitive damages; for attorney's fees and costs of litigation; and for such further relief as the Court deems just and proper, including equitable relief requiring defendant to cease discriminating against women in hiring and in performing work as police officers.

COUNT II

SEX DISCRJMINATION IN \TOLATION OF THE MISSOURI HUMAN RIGHTS ACT

Comes now plaintiff Shannon Woolsey, by and through her attorneys, and for count II of her Petition for Damages against defendant Town and Country, states as follows:

47. Plaintiff re-alleges paragraphs 12, 20-21,23-29 and 31-33, as if fully set forth herein.

48. Venue in this Court is proper pursuant to Mo. Rev. Stat. § 509.101(2) and (6), and Mo. Rev. State g 213.111.1.

49. The conduct of defendant set forth above constituted sex discrimination in violation of Mo. Rev. Stat. § 213.055

50. Plaintiffs sex was a contributing factor in defendant's discrimination against Plaintiff.

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51. Plaintiff timely filed charge number FE-4/II-1467 9 with the MCHR alleging sexual harassment, sex discrimination and retaliation.

52. On December 19, 2011, the MCHR issued a Notice of Right to Sue for the above charge number. A copy of the Notice is attached hereto as Exhibit 1.

53. Plaintiff has filed this lawsuit within 90 days of the date of the above Notice and within two years from the last act of sex discrimination.

54. As a result of defendant's actions, plaintiff has been constructively discharged and has sustained lost wages and benefits of employment.

55. As a result of defendant's actions and failure to take prompt and effective corrective action, plaintiff has suffered emotional distress.

56. As a result of defendant's actions and failure to take prompt and effective corrective action, plaintiff has incurred, and will continue to incur, attorneys' fees and costs of litigation.

57. Defendant's conduct was outrageous because of defendant's evil motive or reckless indifference to the rights of others, and therefore, an award of punitive damages against defendant is appropriate.

WHEREFORE, plaintiff prays that this Court, after trial by jury, enter judgment for plaintiff and against defendant in an amount to exceed \$25,000.00, for plaintiff's economic losses, including plaintiff's lost wages, including prejudgment interest, and front pay and/or reinstatement, for compensatory damages, including damages for emotional distress; for punitive damages; for attorneys' fees and costs of litigation; and for such further relief as the Court deems just and proper, including equitable relief requiring defendant to cease discriminating against women in hiring and in performing work as police officers.

II

COUNT III

RETALIATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

Comes now plaintiff Shannon Woolsey, by and through her attorneys, and for Count III of her Petition for Damages against defendant Town and Country, states as follows:

58. Plaintiff re-alleges paragraphs 13-19, 21-29, and 31-33, as fully set forth herein.

59. Venue in this Court is proper pursuant to Mo. Res. Stat. § 508.101(2) and (6), and Mo. Rev. Stat. § 213.111.1.

60. The conduct of defendant set forth above constitutes retaliation against plaintiff for engaging in protected activity.

61. Plaintiff's complaints of sexual harassment and sex discrimination were a contributing factor in defendant's retaliation against plaintiff, and defendant's retaliation violated Mo. Rev. Stat. § 213.070.

62. Plaintiff timely filed charge number FE-4/11-14679 with the MCHR alleging sexual harassment, sex discrimination and retaliation.

63. On December 19, 2011, the MCHR issued a Notice of Right to Sue for the above

charge number. A copy of the Notice is attached hereto as Exhibit I .

64. Plaintiff has filed this lawsuit within 90 days of the date of the above Notice and within two years from the last act of retaliation.

65. As a result of defendant's actions, plaintiff has been constructively discharged and has sustained lost wages and benefits of employment.

66. As a result of defendant's actions and failure to take prompt and effective corrective action, plaintiff has suffered emotional distress.

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67. As a result of defendant's actions and failure to take prompt and effective corrective action, plaintiff has incurred, and will continue to incur, attorneys' fees and costs Of litigation.

68. Defendant's conduct was outrageous because of defendant's evil motive or reckless indifference to the rights of others, and therefore, an award of punitive damages against defendant is appropriate.

WHEREFORE, plaintiff prays that this Court, after trial by jury, enter judgment for plaintiff and against defendant in an amount to exceed. \$25,000.00, for plaintiffs economic losses, including plaintiffs lost wages, including prejudgment interest, and front-pay and or reinstatement, for compensatory damages, including damages for emotional distress; for punitive damages; for attorneys' fees and costs of litigation; and for such further relief as the Court deems just and proper, including equitable relief requiring defendant to cease discriminating against women in hiring and in performing work as police officers.

Respectfully submitted,

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<http://www.wholou.net/wp-content/uploads/2012/03/Town-Country.pdf>

<http://www.kmov.com/news/local/Former-officer-files-sexual-harassment-suit-again-Town-and-Country-Police-Departmnet-142988735.html>

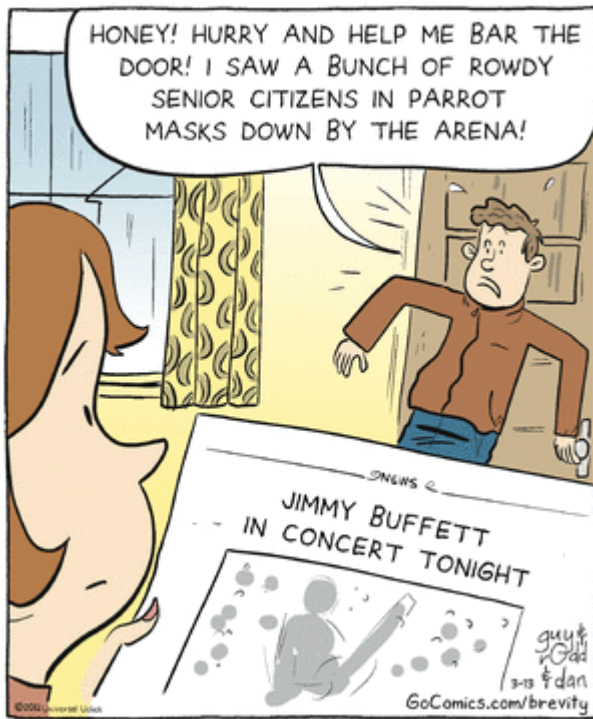
THE OLD LOOK: Brian Marchant-Calsyn, convicted drug dealer and repeatedly sued internet sales guru from one of his sales company's websites.

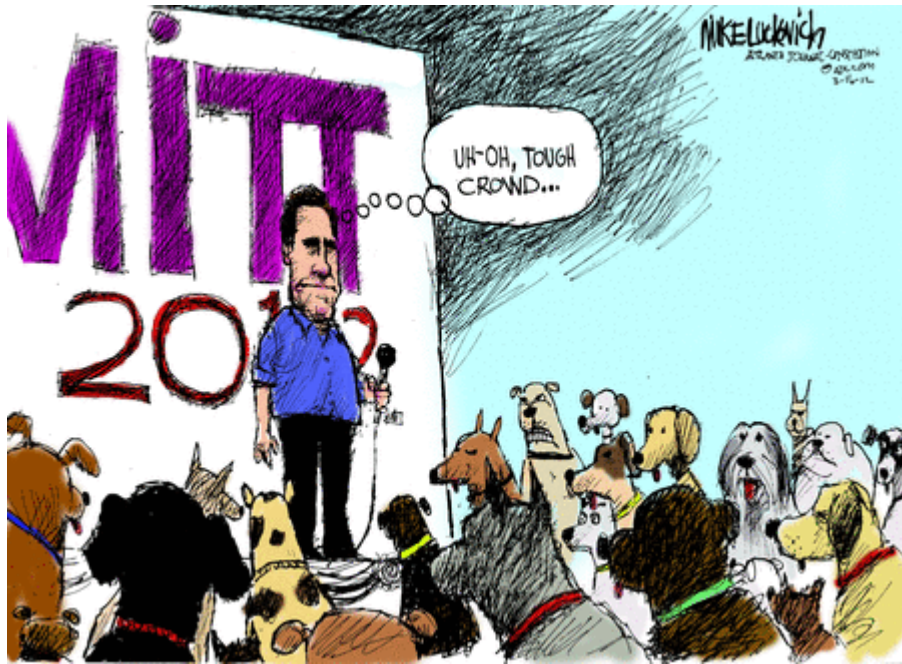


THE NEW LOOK: The latest look from Facebook as he prepares to move out of his compound at 1761 Topping Road



CARTOONS:





THERE'S NO SILVER BULLET
FOR HIGHER GAS PRICES.



UNTIL ANOTHER TEAM WANTS YOU...
YOU'LL HAVE TO WANDER THROUGH
THE DESERT FOR 40 DAYS...

