

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

SHALOM IFEANYI  
c/o RITTGERS & RITTGERS  
12 East Warren Street  
Lebanon, Ohio 45036

Plaintiff,

-v-

MOLLY ALVEY  
c/o University of Cincinnati  
2600 Clifton Avenue  
Cincinnati, Ohio 45221  
*Individually and in her official capacity as  
Head Women's Volleyball Coach at the  
University of Cincinnati*

and

MAGGIE MCKINLEY  
c/o University of Cincinnati  
2600 Clifton Avenue  
Cincinnati, Ohio 45221  
*Individually and in her official capacity as  
Executive Senior Associate Athletic Director  
at the University of Cincinnati*

And

UNIVERSITY OF CINCINNATI  
2600 Clifton Avenue  
Cincinnati, Ohio 45221

Defendants.

) Case No.

)

) Judge

)

) COMPLAINT; JURY DEMAND

) ENDORSED HEREON

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Now comes Plaintiff, Shalom Ifeanyi ("Plaintiff"), by and through counsel, and for her  
Complaint states as follows:

### **PRELIMINARY STATEMENT**

1. This civil rights action challenges Defendants' unlawful and gender and racially discriminatory removal of Plaintiff from the University of Cincinnati women's volleyball team because Plaintiff did not fit Defendant's biased "image" of a University of Cincinnati volleyball player. Plaintiff brings these federal claims for racial/color discrimination, sex discrimination and harassment, and retaliation under 42 U.S.C. § 2000(e) *et seq.* and 42 U.S.C. § 1981 *et seq.* Plaintiff also brings racial/color discrimination, sex discrimination, and sexual harassment claims under Ohio law, R.C. 4112.02 as well as state law claims for intentional infliction of emotional distress caused by the actions of Defendants.

### **PARTIES**

2. Plaintiff is an individual currently residing in Dallas, Texas.

3. Defendant Molly Alvey ("Alvey"), is and was at all times relevant to this action, the Head Women's Volleyball Coach at the University of Cincinnati. Alvey is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case acted under color of law. She is sued in her individual and official capacities.

4. Defendant Maggie McKinley ("McKinley"), is and was at all times relevant to this action, the Executive Senior Associate Athletic Director at the University of Cincinnati. McKinley is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case acted under color of law. She is sued in her individual and official capacities.

5. The University of Cincinnati ("UC") is a recipient of federal funds under and a public university created by the Ohio legislature. UC has a principal place of business at 2600 Clifton Avenue, Cincinnati, Ohio 45220. Under Ohio Revised Code 3361.01, UC's Board of Trustees is the governing body of the university.

### **JURISDICTION AND VENUE**

6. This Court has jurisdiction over the dispute between the parties pursuant to 28 U.S.C. §§ 1331 because Plaintiff's civil causes of action arise under the Constitution and laws of the United States.

7. This Court also has jurisdiction of the supplemental state claims pursuant to 28 U.S.C. § 1367.

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because this Court sits in the district where all of the Defendants reside and is also the district where the substantial part of the events or omissions in connection with Plaintiff's claims arose.

### **FACTS**

9. Plaintiff has played competitive volleyball for most of her life.

10. Beginning around the age of 14, Plaintiff began getting recruited by coaches to play college volleyball.

11. Because Plaintiff's family did not have the financial means to afford a college education for Plaintiff without incurring significant debt, Plaintiff devoted very substantial amounts of time and energy in training to make herself eligible to participate in college athletic scholarship programs.

12. As a result of those efforts, Plaintiff became a student-athlete coveted by college coaches because of her speed, power, strong build – similar to that of Serena Williams – and her ability to jump and “hit a heavy ball.” In the world of competitive volleyball, this means that Plaintiff had developed a powerful volleyball strike that makes it difficult for an opposing team to return, resulting in increased scoring opportunities and the all-important wins that sustain and improve the standing of college athletic programs.

13. Alvey was one of the coaches who heavily recruited Plaintiff while she was in high school.

14. At all times relevant to this Complaint, including while Alvey recruited Plaintiff, Alvey was aware of Plaintiff's strong build and her dark, African American complexion.

15. In or around 2016, Plaintiff elected to attend Oregon State University on an athletic scholarship, but this did not end Alvey's and UC's interest in recruiting Plaintiff to their athletic program.

16. Following the conclusion of the 2016 season, Plaintiff elected to explore transfer options to continue her college volleyball career, due in part to Alvey's continued interest in Plaintiff.

17. Alvey, again aware of Plaintiff's strong build and dark, African American complexion, recruited Plaintiff heavily in hopes that she would attend UC beginning in January of 2017.

18. Primarily in response to, and in reliance upon, the efforts of Alvey, Plaintiff accepted Alvey's request to attend UC and enrolled as a student-athlete in or around January 2017.

19. In announcing Plaintiff's addition to the women's volleyball team through the UC's Athletic Department website, Alvey made this public statement about Plaintiff:

We are very excited to add [Plaintiff] to our team. She has a very positive, upbeat personality and intense competitive spirit on the court. She will fit immediately into our program's culture. I expect [Plaintiff] to score points at the net with her fast arm. She hits a heavy ball and is working on developing multiple shots to her game.

20. Almost immediately upon her arrival on campus, Alvey began harassing and shaming Plaintiff about pictures she was posting on her personal social media accounts.

21. The photographs Alvey took issue with all pictured Plaintiff fully clothed.

22. Specifically, Alvey told Plaintiff that many of her photos were “too sexy.”

23. Upon information and belief, no such requests were made to other members of the women’s volleyball team who were of slighter build and lighter complexion despite photographs picturing them in outfits, including but not limited to, two-piece swimsuits.

24. Afraid of retaliation by Alvey, Plaintiff removed the photographs and began to simply post headshots on her social media profiles for some time thereafter.

25. From February 2017 until June of 2017, Plaintiff trained relentlessly to recover from knee surgery in preparation for the season.

26. She missed no workouts, did extra rehabilitation work on her off days, and often asked Alvey and the training staff for additional workouts so should could become even more explosive on the court.

27. On or about June 19, 2017, Alvey and Plaintiff met in Alvey’s office to discuss Plaintiff’s rehab progress and her role on the team for the upcoming season.

28. Near the end of the meeting, Alvey got up and closed to the door to her office.

29. Alvey then demanded Plaintiff pull up her Instagram profile.

30. Alvey thereafter pointed to a photograph of Plaintiff and demanded that she remove it from her profile. A copy of that photograph is attached hereto as Exhibit 1.

31. Specifically, Alvey said to Plaintiff: “When the football players see this, what do you think they see? They see your breasts. It’s seductive.”

32. Alvey thereafter demanded that Plaintiff remove the photograph from her Instagram profile while she was in her office.

33. Fearful of retaliation and continued shaming from Alvey, Plaintiff complied with her request, deleted the photograph, and left the office.

34. On or about June 21, 2017, one day after Plaintiff's 19<sup>th</sup> birthday, Plaintiff received the text messages attached as Exhibit 2 from Alvey.

35. In these text messages, Alvey again demanded that Plaintiff remove certain pictures from her Instagram account.

36. Tired of the constant body shaming from Alvey, Plaintiff objected via text message to Alvey's demand. A copy of Plaintiff's response is attached as Exhibit 3.

37. Alvey never responded to Plaintiff's text message, but later acknowledged to Plaintiff that she received it.

38. During the week of June 24, 2017, Plaintiff continued to train for the upcoming volleyball season and was awarded top performer of the week by the strength training coach.

39. Despite that recognition, on or about June 29, 2017, Alvey called Plaintiff into her office and told her that she was dismissed from the team.

40. The only explanation offered by Alvey was that she and Plaintiff "had different philosophies."

41. When Plaintiff asked if her dismissal had anything to do with her text response the prior week, Alvey indicated that she read it, but would not discuss it further and offered no other reason for this devastating action.

42. McKinley was present during this June 29, 2017 meeting and agreed with Alvey's dismissal of Plaintiff and the need for Plaintiff and UC to "part ways." Like Alvey, McKinley offered no reason for the dismissal.

43. Plaintiff was thereafter advised to return her school issued apparel by the next day.

44. She was later advised that she needed to remove all of her belongings from her athletic dorm room because Alvey was giving her room to another student-athlete.

45. Following Plaintiff's unlawful dismissal from the women's volleyball team, she filed a complaint with UC's Title IX Office concerning the discriminatory actions of Alvey and McKinley.

46. In the almost nine months since Plaintiff filed her complaint with the Title IX Office, UC has failed to complete its investigation of the allegations raised therein or to afford Plaintiff with any meaningful opportunity to appeal the decision to remove her from the team and to remove her scholarship.

47. While Plaintiff has been able to remain on scholarship for the entirety of the 2017-2018 academic year, she has been advised that based on her dismissal from the team, her scholarship would not be renewed.

48. Due to NCAA transfer rules and regulations, Plaintiff will not be able to play competitive volleyball for the 2018-2019 season, effectively ending any potential ability for Plaintiff to rely on an athletic scholarship for payment of tuition and related costs.

49. Plaintiff has therefore been forced, without the benefit of an athletic scholarship, to enroll in another university to complete her undergraduate studies and has lost earning capacity due to the delay and disruption in her education.

**FIRST CAUSE OF ACTION**  
**(Race/Color Discrimination – All Defendants)**

50. Plaintiff incorporates her previous allegations as if fully rewritten herein and states further as follows.

51. Defendants' conduct constitutes unlawful disparate treatment on the basis of race/color in violation of, *inter alia*, 42 U.S.C. § 2000(e) *et seq.*, 42 U.S.C. § 1981, and O.R.C. § 4112.02.

52. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship, will be forced to pay for the remainder of her college education on her own, and has lost earning capacity due to the delay and disruption in her education.

53. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

**SECOND CAUSE OF ACTION**  
**(Sex Discrimination – All Defendants)**

54. Plaintiff incorporates her previous allegations as if fully rewritten herein and states further as follows.

55. Defendants' conduct constitutes unlawful disparate treatment on the basis of sex in violation of, *inter alia*, 42 U.S.C. § 2000(e) *et seq.*, 42 U.S.C. § 1981, O.R.C. § 4112.02.

56. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship, will be forced to pay for the remainder of her college education on her own, and has lost earning capacity due to the delay and disruption in her education.

57. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

**THIRD CAUSE OF ACTION**  
**(Sexual Harassment – All Defendants)**

58. Plaintiff incorporates her previous allegations as if fully rewritten herein and states further as follows.

59. Plaintiff is a member of a protected class as defined by state and federal law.

60. Defendants' body shaming and sex discrimination described herein constitutes unwelcome sexual harassment in violation of, *inter alia*, 42 U.S.C. § 2000(e) *et seq.*, 42 U.S.C. § 1981, O.R.C. § 4112.02.

61. Defendants' conduct was based on Plaintiff's sex.

62. Defendants' actions unreasonably created a hostile, offensive, or intimidating environment for Plaintiff while she was a student-athlete at UC.

63. UC, by and through, Alvey and McKinley, was aware of the body shaming described herein but made no efforts to end it.

64. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship, will be forced to pay for the remainder of her college education on her own, and has lost earning capacity due to the delay and disruption in her education.

65. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

**FOURTH CAUSE OF ACTION**  
**(Retaliation – All Defendants)**

66. Plaintiff incorporates her previous allegations as if fully rewritten herein and states further as follows.

67. Plaintiff's objection to Alvey's body shaming, racial discrimination, sex discrimination, and sexual harassment is protected activity as defined by 42 U.S.C. § 2000(e) *et seq.*

68. UC, by and through Alvey and McKinley, was aware of Plaintiff's exercise of her protected rights.

69. In response to Plaintiff's exercise of her protected rights, UC, by and through Alvey and McKinley, dismissed Plaintiff from the women's volleyball team and refused to renew her athletic scholarship.

70. Plaintiff's dismissal from the volleyball team was a direct and proximate of result of her text message objecting to the discrimination and body-shaming she was subjected to by Alvey.

71. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship, will be forced to pay for the remainder of her college education on her own, and has lost earning capacity due to the delay and disruption in her education.

72. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

**FIFTH CAUSE OF ACTION**  
**(Civil Conspiracy – All Defendants)**

73. Plaintiff incorporates her previous allegations as if fully rewritten herein and states further as follows.

74. Following Plaintiff's objections to the discrimination and body-shaming she was being subjected to by Alvey. UC, by and through Alvey and McKinley, engaged in a concerted effort to remove Plaintiff from the women's volleyball team in violation of 42 U.S.C. § 2000(e) *et seq.*

75. The concerted actions of Alvey and McKinley were unlawful.

76. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship, will be forced to pay for the remainder of her college education on her own, and has lost earning capacity due to the delay and disruption in her education.

77. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

**SIXTH CAUSE OF ACTION**

**(Intentional Infliction of Emotional Distress – All Defendants)**

78. Plaintiff incorporates her previous allegations as if fully rewritten herein.

79. Defendants intended to cause, or knew or should have known that their actions would result in serious emotional distress to Plaintiff.

80. Defendants' conduct was so extreme and outrageous that it went beyond all possible bounds of decency and can be considered completely intolerable in a civilized community.

81. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship and will be forced to pay for the remainder of her college education on her own.

82. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

**SEVENTH CAUSE OF ACTION**

**(Denial of Due Process – 42 U.S.C. 1983)**

83. Plaintiff incorporates her previous allegations as if fully rewritten herein.

84. The acts of Alvey and McKinley represent official policy decisions of UC and are attributable to UC.

85. At all times relevant to this Complaint, Plaintiff had a clearly established right to due process of law concerning her position of the women's volleyball team and her athletic scholarship.

86. Plaintiff was not afforded an unbiased, careful, and deliberate review process either prior to her dismissal from the UC women's volleyball team or following the notice of the deprivation of her scholarship.

87. Defendants' actions constitute a deliberate denial, under color of law, of plaintiff's procedural due process rights as guaranteed by the Fourteenth Amendment to the U.S. Constitution.

88. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has lost her athletic scholarship and will be forced to pay for the remainder of her college education on her own.

89. Plaintiff has also incurred pain and suffering in the form of humiliation, frustration, aggravation, anger and depression.

WHEREFORE, Plaintiff respectfully demands judgment against Defendants, jointly and severally, for compensatory damages, punitive damages, reasonable attorney fees, costs and all other relief to which she may be entitled.

Respectfully Submitted,

/s/ Ryan J. McGraw

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Konrad Kircher (0059249)  
Ryan J. McGraw (0089436)  
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Rmartinez@rdm-law.us  
*Co-Counsel for Plaintiff*  
*Pro Hac Vice Motion Forthcoming*

**JURY DEMAND**

Plaintiff hereby demands trial by a jury of her peers as to all issues so triable herein.

/s/ Ryan J. McGraw

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Ryan J. McGraw (0089436)



12:22 PM 88% 4G LTE

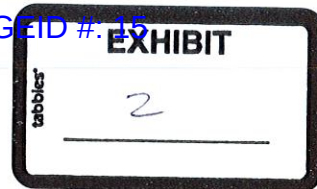
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♥ arelifeanyi, hey\_itz\_leila\_girl and 217 others

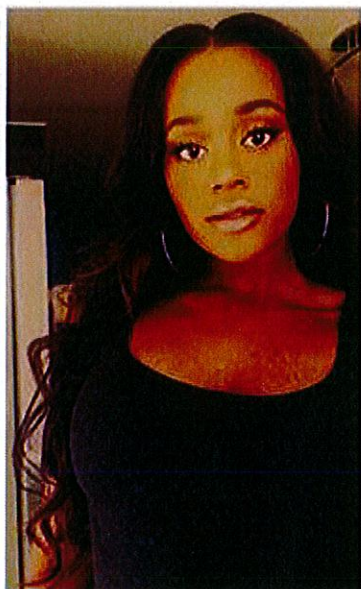
shalomcifeanvi 🙏





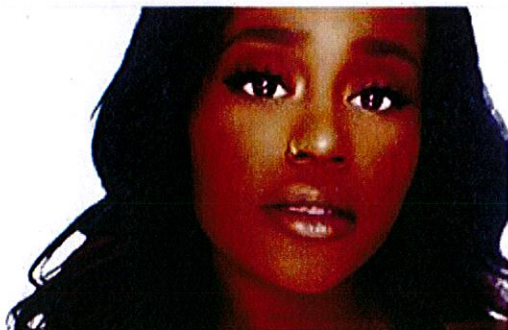
Wed, Jun 21, 8:39 AM

 shalomcifeanyi ...



Liked by jtom19, sabrinawolf25 and 374 others  
shalomcifeanyi All summer '17

 shalomcifeanyi ...





●○○○○ AT&T LTE 10:34 AM 58%  
< 17 C ⓘ  
Coach Molly

pictures today:

Ok Coach However I feel like I'm being body shamed because I'm not flat chested. I'm not trying to show my boobs coach, I can't make them go away. In these pictures I just got my hair done and really liked my makeup and thought the pictures were pretty. My teammates have swimsuit photos that are more revealing than me in a tank top. I will delete them if you really want me too but I feel like because people say I'm pretty I'm being sexualized. There's a history of black women because of their bodies being sexualized and that's what appears to be happening to me. I can't help the way I'm built. I am not trying to argue, I just feel like I have to be flat chested or real skinny in order to post

Yesterday 11:50 AM



iMessage



JS 44 (Rev. 06/17)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Shalom Ifeanyi  
c/o Rittgers & Rittgers

(b) County of Residence of First Listed Plaintiff **Dallas**  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Konrad Kircher & Ryan McGraw, Rittgers & Rittgers, 12 East Warren  
Street, Lebanon, Ohio 45036, 513-932-115

**DEFENDANTS**

Molly Alvey, Maggie McKinley, & University of Cincinnati

County of Residence of First Listed Defendant **Hamilton**  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Injury Product Liability <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 USC 2000; 42 USC 1981; 42 USC 1983

Brief description of cause:

Race and sex discrimination; sexual harassment, and violation of due process

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
75,000.00

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

03/20/2018

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE