

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JERI HAGEMEYER	:	Case No. 1:05-cv-0507
2491 E. Ridge Drive	:	
Hamilton, Ohio 45011,	:	Judge Michael Barrett
	:	
Intervenor,	:	
	:	
vs.	:	
	:	
CORP. SEC. SOLUTIONS, INC.	:	
1147 28th Street S.E.	:	
Grand Rapids, Michigan 49508,	:	<u>COMPLAINT</u>
	:	<u>IN INTERVENTION</u>
Defendant.	:	

NOW COMES intervenor, by and through counsel, and for her Complaint in Intervention states the following:

Parties

1. Plaintiff JERI HAGEMEYER ("Hagemeyer") is a citizen of the State of Ohio residing at 2491 E. Ridge Drive in the City of Hamilton, Butler County, Ohio, within the Southern District of Ohio.

2. Defendant CORPORATE SECURITY SOLUTIONS, INC. ("Corporate Security") is a Michigan corporation engaged in the business of providing private security services. At all times herein, Corporate Security operated offices at 570 Northland Boulevard in City of Springdale, Hamilton County, Ohio ("Cincinnati Office"), within the Southern District of Ohio, for that purpose.

3. At all times relevant herein, Christopher Coppola ("Coppola"), was the Regional Vice-President, and Frank Sullivan ("Sullivan") the General Manager, at the Cincinnati Office. At all times herein, Coppola and Sullivan acted as agents and employees of Corporate Security.

Jurisdiction and Venue

4. Hagemeyer brings this action for monetary damages pursuant to:

(a) 42 U.S.C. §2000e-2;

(b) Sections 2(A) and 99 of the Ohio Fair Employment Practices Act, R.C. §§4112.02(A) and 4112.99; and

(c) the common law of the State of Ohio.

5. Each of the tortious acts set forth hereinbelow occurred in the City Springdale, Hamilton County, Ohio, within the Southern District of Ohio.

General Allegations

6. From December 1, 2003 to January 21, 2004, Corporate Security employed Hagemeyer as an administrative assistant. At all times relevant herein, Coppola was Hagemeyer's immediate supervisor.

7. Throughout that period, Corporate Security considered Hagemeyer to be a conscientious and diligent employee who satisfactorily performed the duties of her position. During her employment, Hagemeyer did not receive any verbal written warnings regarding her work performance.

8. On December 19, 2003, learned that she was pregnant, and immediately reported her condition to Sullivan.

9. On January 19, 2004, Hagemeyer developed severe abdominal pains, for which she sought medical treatment on her lunch hour. Initially, she sought treatment at the Ft. Hamilton Hospital Emergency Room; she followed up the next day with her family physician. That physician placed her on medical leave for January 19, 20 and 21, 2004.

10. On both January 19 and 20, 2004, Hagemeyer spoke with Coppella, explaining her situation, and informing him her physician had given her a medical slip, a copy of which she faxed over that day, and the original of which she would present on January 22, 2004, upon her return.

11. Later on January 21, 2004, Sullivan contacted Hagemeyer by telephone, told her that things were not working out, and terminated her employment. Sullivan also admitted, upon inquiry by Hagemeyer, that the reason for her termination was her pregnancy.

12. Subsequently, on or about February 1, 2004, Hagemeyer filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC"). Thereafter, on July 29, 2005, The EEOC initiated this action, based upon said charge of discrimination.

Count One

13. Plaintiff restates each and every allegation raised in the General Allegations set forth in Paragraph One through Twelve (1-12) of the Complaint as is fully rewritten herein.

14. Corporate Security, through the actions of Coppola and Sullivan set forth above, has discriminated against Hagemeyer on the basis of her gender in violation of Title VII, section 2 of the Civil Rights Act of 1964, 42 U.S.C. §2000e-2.

15. As a direct and proximate result of said discrimination, Hagemeyer has suffered and continues to suffer damages in an amount estimated to be in excess of Twenty Thousand Dollars (\$20,000.00), to be more fully determined at trial.

Count Two

16. Plaintiff restates each and every allegation raised in the General Allegations set forth in Paragraph One through Twelve (1-12) of the Complaint as is fully rewritten herein.

17. Corporate Security, through the actions of Coppella and Sullivan set forth above, has discriminated against Hagemeyer on the basis of her gender in violation of Sections 2(A) and 99 of the Ohio Fair Employment Practices Act, Ohio Rev. Code §§4112.02(A) and 4112.99.

18. As a direct and proximate result of said discrimination, Hagemeyer has suffered and continues to suffer damages in an amount

estimated to be in excess of Twenty Thousand Dollars (\$20,000.00), to be more fully determined at trial.

Request for Relief

WHEREFORE, plaintiff Jeri Hagemeyer respectfully requests that judgment be entered in his favor and against defendant Corporate Security Solutions, Inc., as follows:

A. An award of compensatory damages in an amount that will fully compensate plaintiff for her injuries, an amount estimated to be in excess of Twenty Thousand Dollars (\$20,000.00);

B. An award of punitive damages in the amount of One Hundred Thousand Dollars (\$100,000.00);

C. An award of the costs of bringing this action, including reasonable attorney's fees; and

D. Such other relief as this court may deem just and proper.

/s/ John H. Forg
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Attorneys for Intervenor
Jeri Hagemeyer

CERTIFICATE OF SERVICE

A copy of the foregoing Complaint in Intervention was served upon Howard Besser, Equal Employment Opportunity Commission, 1660 W. Second St., Suite 850, Cleveland, Ohio 44113-1412, attorney for plaintiff, and upon Lawrence E. Barbieri, Schroeder, Maundrell, Barbieri & Powers, 11935 Mason Road, Suite 110, Cincinnati, Ohio 45249, attorney for defendant, by electronic mail, on this 10th day of August, 2006.

/s/ John H. Forg _____
JOHN H. FORG (0041972)

Attorney for Intervenor
Jeri Hagemeyer