

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SIGUTE MEILUS and LAURA EKAU TAYLOR,

Plaintiffs,

COMPLAINT

Civ. No.: 1:21-cv-02554

v.

RESTAURANT OPPORTUNITES CENTER
UNITED, INC., SIBY SKEOU, and ALICIA RENEE
FARRIS

Defendants.

JURY TRIAL DEMANDED

Plaintiffs demand a jury to try all claims triable by a jury.

PRELIMINARY INTRODUCTION

1. This is an action brought pursuant Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000 et seq., as amended, 42 U.S.C. § 1981, and the New York State Human Rights Law, Executive Law § 290 et seq.

JURISDICTION AND VENUE

2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1343, 42 U.S.C. § 2000 (e), 29 U.S.C. § 1331, 42 U.S.C. § 1981. The Court also has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 to adjudicate Plaintiffs' claims under state law.
3. Venue is proper pursuant to 28 U.S.C. § 1391.

ADMINISTRATIVE EXHAUSTION

4. Plaintiff SIGUTE MEILUS ("Plaintiff Meilus" or "Ms. Meilus") filed charges of

discrimination with the Equal Employment Opportunity Commission (“EEOC”) on December 16, 2020 and was issued a Notice of Right to Sue on December 30, 2020. She has timely exhausted all of her claims of discrimination herein and has filed this Complaint with the District Court for the Southern District of New York within 90 days of receipt of her Notice of Right to Sue.

THE PARTIES

5. Ms. Meilus is an individual female, approximately age 30 at all relevant times herein.
6. Ms. Meilus was employed by Defendant RESTAURANT OPPORTUNITIES CENTER (ROC) UNITED, INC (“Defendant ROC”) as a Mid-Atlantic Regional Director Program Manager first as a contract employee in January 2019 and then as a full-time employee starting February 1, 2019 until March 6, 2020 when she was wrongfully terminated.
7. Plaintiff Laura Ekau Taylor (“Plaintiff Ekau” or “Ms. Ekau”) is an individual black female, approximately age 30 at all relevant times herein.
8. Ms. Ekau was employed by Defendant ROC as Lead Organizer from January 2018 until October 2019, tasked with starting and organizing a New Orleans chapter while working remotely for and traveling to Defendant ROC’s New York headquarters.
9. Defendant ROC is a New York non-for-profit corporation headquartered in New York, New York with a chapter offices throughout US cities such as Washington DC, Oakland, New Orleans, and Chicago. Defendant ROC’s

headquarters is located at 274 7th Avenue, New York, NY 10001.

10. At all relevant times, Defendant ROC was an “employer” of Plaintiffs within the meaning of applicable statutes as well as New York state law. In doing the acts herein alleged, Defendant ROC’s employees, subcontractors, and agents acted within the course and scope of their employment and agency with Defendant ROC and engaged in the acts alleged herein and/or conducted, permitted, authorized, and/or ratified the conduct of its employees, subcontractors, and agents, and is vicariously liable for the wrongful conduct of its employees, subcontractors, and agents alleged herein.
11. Plaintiffs were “employees” within the meaning of applicable statutes as well as New York state law.
12. Defendant Sekou Siby (“Defendant Siby”), at all relevant times was the Executive Director for Defendant ROC.
13. Defendant Alicia Renee Farris (“Defendant Farris”), at all relevant times was Chief Operations Officer and Human Resources Director for Defendant ROC.
14. Defendant ROC, and DOES 1 through 100, inclusive, are hereinafter referred to collectively as (“Defendants”) unless otherwise specifically identified.

FACTUAL ALLEGATIONS

Plaintiff Sigute Meilus

15. For the first several months of her employment, Ms. Meilus performed well as a Manager/Director and was comfortable in both her work environment and job duties.
16. But, in the summer of 2019, she was assigned to be supervised by Al Chavez, an elderly male, approximately in this 50s (“Mr. Chavez”) who engaged in a pattern of harassment based on her gender and age. He targeted her as a young woman in a leadership role.
17. As the only female on the management team, she was routinely referred to as “kid” by Chavez who also only referred to female staffers as “kid”, used words referring to being “somebody’s bitch”, said more “female energy” was needed, that “women know how to get shit done”, regularly ignored use of employees’ preferred pronouns, and called females “entitled” and “bratty”. This occurred routinely during the course of her employment. In fact, Chavez asked about Ms. Meilus’ age on many occasions, and would say things like “you’re only...years old”, “you’re so young”, “you could be doing anything”, and “why do you want to work here?”.
18. At the time, Ms. Meilus was 30 (thirty) years old with 8 (eight) years of organizing experience, and in her 4th year in a managerial role. She was on the younger side of other staff and managers but was hired due to her prior work and experience and was performing at the same level as her peer managers.

19. Chavez attempted to diminish her accomplishments and value to the organization because he felt she was "too young" in her role.
20. Chavez routinely cancelled weekly supervisory check-ins with Ms. Meilus, and regularly passed information relevant to her job through the other regional directors and not Ms. Meilus. It was clear that this was done because of her being a younger female professional. Her fellow peers, with the same job description, were both older and male and treated more favorably.
21. Ms. Meilus was excluded by Chavez from leadership meetings which were critical to her job function only to later find out that other male employees in lower ranked positions attended those same meetings. Also, she was shockingly also excluded from an organization-wide leadership retreat to also find out that a newly hired male Regional Director who had no relevant responsibilities was invited to and did attend. Staff were at a loss as to why Ms. Meilus was left out considering her essential leadership duties and requirements in managing her team.
22. When Ms. Meilus complained, Chavez admitted that to a plot to remove her from her position. Immediately thereafter, her responsibilities were reduced drastically.
23. Chavez's supervisor, Teo Reyes ("Reyes") then made an attempt to terminate her employment claiming that Pennsylvania staff failed to meet certain metrics even though that was not ever a terminable measure.
24. Chavez and Reyes reported to Defendant Sekou and Defendant Farris at

all relevant times.

25. Ms. Meilus then took part in a leadership meeting attended by Chavez and two Regional Directors of that time, Jordan Romanus and Alando Reeves. During that meeting, she raised the issue of gender pay inequity while Chavez continued to refer to young women employees as “kid”.
26. On March 3, 2020, Ms. Meilus had a discussion with Defendant Siby about chapter budgeting and long-term organizing plans. With him, she raised the issue of her compensation as her salary, for the first time was included in the ROC DC chapter but not the ROC PA budget even though she oversaw both budgets. A heated discussion occurred with respect to Defendant ROC not paying all employees particularly females equitably.
27. A few days later, on March 6, 2020, Ms. Meilus was informed by Reyes that she was not a good fit for the organization based on her skill set and was terminated from her employment.
28. Ms. Meilus’s termination was approved and signed by Defendant Farris and resulted shortly after she complained to Defendant Siby.
29. Ms. Meilus never had any negative work-related or performance-related issues. In fact, her chapter was meeting required goals and she was excelling in her job functions.
30. Ms. Meilus was fired with no notice and was unable to send any emails to reach out to any contacts or even cancel pending meetings and address high-end projects. She felt demoralized and dehumanized to be terminated abruptly via email.

31. Upon information and belief, David Palmer, a similarly situated male employee who shared her management role was paid far more than her and paid a severance at the time of his separation whereas she was not.
32. During the course of her employment, Ms. Meilus was deterred from making any formal complaints to Human Resources. Chavez informed her that HR and other managers had a negative view of younger staff such as herself, making obvious her complaints would not serve her well.
33. During all relevant times, Human Resources was run by one sole person, Defendant Farris, an elder woman. Chavez specified he was working on Defendant Farris not being negative towards young staff such as Jordan (age 30) and Ms. Meilus. He stated that he would “work on her view” of Ms. Meilus. It was strange since he was the one that had clearly treated her differentially, but this impacted her, and she did not think Human Resources would support a complaint from her.
34. When Ms. Meilus did finally bring up her concerns of pay inequity to Defendant Sekou, no remedial action was taken by Defendant ROC and she was instead terminated in retaliation.

Plaintiff Laura Ekau Taylor

35. Ms. Taylor, an experienced and passionate labor organizer was hired by Defendant ROC to create, establish and maintain a brand-new chapter in New Orleans. With her known extensive network of black labor workers from her previous tenure at an organization titled Fight for 15, Defendant Roc was fully aware of the network she would bring and expected that the

New Orleans base would grow accordingly.

36. When Ms. Taylor was hired to work, she was the only staffer in New Orleans, tasked with physically putting a new office together, organizing labor workers in New Orleans and essentially taking on the role of Director for Defendant Roc with little staff, resources or support. She was not even given access to any grant money or funding to accomplish these goals even though funds were earmarked for this new chapter.

37. Immediately upon commencing her employment, Ms. Taylor was shocked to find that Defendant ROC through its agent, Defendant Farris had sent her to set up an office in an empty, unrenovated restaurant building that had been long abandoned. The building was disgusting and unsuitable in every way – overrun by rodents, littered by dead animals, damaged by flood, mold and mildew, strewn with rotting equipment, taken over by homeless squatters, with no doors to actually enclose the workspace, and scattered with glass from broken storm windows. To say the least, this “office space” was a health and safety violation paid for, endorsed and defended by Defendant ROC.

38. Ms. Taylor was expected to work in this space, told to pay for her own office door as well as hire and house interns. When she raised concerns, she was told to “clean” as she worked and set up the building and her office. Yet, cleaning in fact amounted to debris removal, handling hazardous material, mold abatement, flood rehabilitation and other construction-related tasks that Ms. Taylor was not qualified for nor hired to complete.

39. Ms. Taylor also learned that Defendant ROC paid exorbitant rent for the clearly inadequate building with grant money funds, funds that were not being appropriately used for employee's offices. The same grant money was also not being utilized for the planned restaurant that was to create labor and employment opportunities for the people of New Orleans. Defendant ROC was raising and obtaining money for these purported restaurant and office ventures but not using monies for those intended purposes. Instead, Ms. Taylor was subjected to inhumane and unsafe working conditions.

40. All the while, Ms. Taylor was successful in bringing on new members for Defendant ROC, all restaurant workers from the New Orleans area, all black and looking for greater opportunities through their ROC membership. These opportunities never manifested in stark contrast to Defendant ROC's other ventures such as in the Seattle chapter where the majority of membership is not black.

41. Defendant ROC gave Ms. Taylor no resources to help the black membership find better positions in the restaurant industry and avoid exploitation by restaurants and fast-food establishments in the area, the very purpose of the organization.

42. Ms. Taylor had no choice but to hold meetings in the deplorable building. When she complained of the conditions, she was told to work at a coffee shop but that was not conducive to preparing campaigns, posters or other organizing tasks that she was planning for her members in a humble effort

to provide some benefits to them.

43. Ms. Taylor would routinely complain to Defendant Farris about her work conditions. When Ms. Taylor reported a break-in to the office building, she was told by Defendant Farris to put plywood over the broken window and keep working, showing no concern for her or her black members.

44. Ms. Taylor continuously used her personal funds for basic needs because Defendant ROC refused to reimburse her or compensate vendors despite any work performed and the submission of invoices. She frequently had to pay vendors and members herself due to Defendant ROC's neglect.

45. Ms. Taylor was denied funding for her program initiatives which served the black members of New Orleans. She regularly complained about how her black membership was treated disparately within Defendant ROC organization.

46. Periodically, Defendant ROC would convene members nationally. Members were expected to pay their own way, take time off work but were not provided with any substantial benefit in attending these expensive events.

47. The first national event occurred in New York. Ms. Taylor organized her black members to attend this event even though Defendant ROC refused to send any stipend for her members but at the same time required their attendance. Members who earned \$200/week at best were unreasonably expected to pay for their own transportation, food and housing for an event in New York in direct contradiction with the purpose and mission of the

organization. Nevertheless, Ms. Taylor was able to put her membership group together, but they were treated so disparately when they arrived at the event.

48. Ms. Taylor paid for all expenses for her members out of pocket as Defendant ROC did not provide catering or accommodations but gave out \$20 bills to white members while completely neglecting her black members.

49. For restaurant owners who attended the same events and were all white, Defendant ROC provided full accommodations, flights and catering with no issue.

50. After this event, Ms. Taylor complained to Defendant ROC that her black membership was being mistreated by the organization and particularly at this first event, and that Defendant ROC was showing its anti-blackness. She explained that her members worked in the only city where the wage was \$2.13 but Defendant ROC aided in exploiting them, instead of assisting them. She was clear in her position that Defendant ROC was exploiting her black members for funding purposes and grant money.

51. A few months later, Defendant ROC held another event in Washington DC where Ms. Taylor's black members would continue to be treated disparately in comparison to white restaurant owners who were given 100k in their budget, served catered food in different rooms while black members were ignored. In fact, the separation was so clear with white owners in one room and black members in another room.

52. When Ms. Taylor returned from this event, fellow ROC staff members

collectively discussed how awful black members were being treated by Defendant ROC.

53. Ms. Taylor again specifically complained about the treatment of her black membership, members she had specifically recruited who had expectations in the very least to not be exploited.

54. A few months later, with still no improvement to her office conditions, funding for her essential projects, or advancement for her members, she still organized her members to attend another ROC event in New York. But, due to their prior experience, members pulled out in fear of being treated poorly again by Defendant ROC. Ms. Taylor planned to attend this non-mandatory event in hopes of having further discussions with leadership about the mistreatment of her black members in New Orleans. Unfortunately, Ms. Taylor was unable to board her flight due to a delay at the airport stemming from a security issue as she was traveling on September 11. She notified her supervisor immediately who was on vacation at the time. She went back to her "office" and also informed Defendant Farris who made no further comment on the matter.

55. Up until that time, Ms. Taylor had been working on a written submission to Defendant ROC with her colleagues summarizing the mistreatment of black members throughout the organization. It was planned that Ms. Taylor and her colleagues would present this grievance/complaint letter to Defendant ROC in-person in New York at the scheduled event. That opportunity never manifested for Ms. Taylor, but the written submission was given to

Defendant ROC with Ms. Taylor identified a contributor and her own specific issues of anti-blackness and racism in her local chapter being asserted.

56. This letter marked the first time that Ms. Taylor made a formal complaint to Defendant ROC about the mistreatment of her black members. She was made aware by her colleagues that the submission was received by Defendant ROC, was circulating and being discussed.

57. Shortly thereafter, Mr. Taylor received a text message indicating that there would be disciplinary meeting for a “no show no call”, presumably for her missed flight to the event. She contacted her union representative and planned to defend herself at the meeting. But she was later told that the disciplinary meeting was never scheduled and/or cancelled. Months later, without any further notice, without a disciplinary meeting in violation of her collective bargaining agreement, she received a text from supervisor, Al Chavez who stated he was in New Orleans. On his first trip ever to visit the New Orleans office, he terminated Plaintiff at a meeting without further explanation.

58. Chavez reported directly to Defendant Sekou and Defendant Farris at that time.

59. On October 25, 2019, Defendant Farris sent Ms. Taylor a letter terminating her and falsely claiming for the first time that she was a “no call, no show” at a *mandatory* event in Washington, D.C.

60. During her tenure with Defendant ROC, Ms. Taylor worked completely independently and received exemplary performance appraisals. She was

never disciplined or written up for any issues. She was instrumental in creating the membership for the New Orleans chapter and organizing all initiatives.

61. Ms. Taylor had 5 (five) supervisors during her employment, each providing shuffling accountability. Defendant Farris only visited the office one time. Defendant Siby never came to the office while his predecessor came once on a brief layover despite her calls for assistance.

62. Ms. Taylor represents the core values that Defendant ROC claimed to hold but in reality, it shunned her for being a black female who actually cared for and about her working-class black members who were equally mistreated. Moreover, money was being raised specifically for New Orleans members but not being provided for them.

63. This is a stark contrast to the treatment of Defendant ROC to its Seattle chapter, a membership of white owned restaurants of white members. In the Twin cities chapter, white male organizer – Eli Edleson-Stein received great support for his white membership and never experienced any retaliation when he complained or requested greater support.

64. Ms. Taylor's employment amounted to Defendant ROC's complete disregard for her personal safety, mandating projects but not funding them, disparate treatment for New Orleans membership which translated to discrimination and anti-blackness, and a culture perpetuated by discriminatory management with no vision or accountability.

65. Ms. Taylor's termination was the direct result of discrimination based on her

race, the race of her membership and retaliation for having complained regarding same.

FIRST CAUSE OF ACTION:

**DISCRIMINATION IN VIOLATION OF 42 U.S.C. § 1981
AS AND AGAINST DEFENDANT ROC
BY PLAINTIFF LAURA EKAU TAYLOR**

66. Plaintiff repeats and re-alleges by reference each and every allegations contained in paragraphs stated above and incorporates the same as though fully set forth herein.

67. In engaging in the conduct described above, Defendant ROC deprived Plaintiff, an African American female, of her civil rights pursuant to 42 U.S.C. §1981, in particular, the racial discrimination, disparate treatment and wrongful termination suffered by Plaintiff violated the law.

68. The discrimination suffered by the Plaintiff on account of her race was egregious and shocking to the conscience. As a direct result, Plaintiff was caused to undergo the humiliation and indignities from the racially discrimination she suffered and was caused and will continue to undergo and endure severe mental anguish, humiliation and economic hardship as a consequence thereof.

69. As a result of the Defendant's deprivations of Plaintiff's civil rights, Plaintiff has been damaged in an amount to be determined by a jury at the time of trial.

70. Plaintiff demands costs and attorney fees pursuant to 42 U.S.C. § 1988.

SECOND CAUSE OF ACTION:

**RETALIATION IN VIOLATION OF 42 U.S.C. § 1981
AS AND AGAINST DEFENDANT ROC
BY PLAINTIFF LAURA EKAU TAYLOR**

71. Plaintiff repeats and re-alleges by reference each and every allegations contained in paragraphs stated above and incorporates the same as though fully set forth herein.
72. In engaging in the conduct described above, Defendant ROC retaliated against Plaintiff in violation of 42 U.S.C. §1981 after she engaged in protected activity.
73. The retaliation suffered by the Plaintiff was egregious and shocking to the conscience, causing Plaintiff to undergo the humiliation and indignities from retaliation she suffered and was caused and will continue to undergo and endure severe mental anguish, humiliation and economic hardship as a consequence thereof.
74. As a result of the Defendant's deprivations of Plaintiff's civil rights, Plaintiff has been damaged in an amount to be determined by a jury at the time of trial.
75. Plaintiff demands costs and attorney fees pursuant to 42 U.S.C. § 1988.

THIRD CAUSE OF ACTION:

**GENDER DISCRIMINATION IN VIOLATION OF TITLE VII OF CIVIL
RIGHTS ACT OF 1964 AS AND AGAINST
DEFENDANT ROC BY PLAINTIFF SIGUTE MEILUS**

76. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as

though fully set forth herein.

77. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied gender discrimination by subjecting Plaintiff to disparate treatment and wrongfully terminating her on the basis of gender in violation of Title VII of the Civil Rights Act of 1964, as amended.

78. As a result of Defendant ROC's illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendants ROC'S discriminatory practices unless and until this Court grants relief.

FOURTH CAUSE OF ACTION:

**AGE DISCRIMINATION IN VIOLATION OF TITLE VII OF CIVIL RIGHTS
ACT OF 1964 AS AND AGAINST DEFENDANT ROC BY
PLAINTIFF SIGUTE MEILUS**

79. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.

80. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied age discrimination by subjecting Plaintiff to disparate treatment and wrongfully terminating her on the basis of age in violation of Title VII of the Civil Rights Act of 1964, as amended.

81. As a result of Defendant ROC's illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendants ROC'S discriminatory practices unless and until this Court grants relief.

FIFTH CAUSE OF ACTION:

**RETALIATION IN VIOLATION OF TITLE VII OF CIVIL RIGHTS ACT OF
1964 AS AND AGAINST DEFENDANT ROC
BY PLAINTIFF SIGUTE MEILUS**

82. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.

83. Plaintiff, in good faith, complained to Defendant ROC of discrimination that occurred in the workplace based on her gender and age.

84. Plaintiff therefore engaged in protected activity under Title VII.

85. Plaintiff was subject to retaliation as a result in the form of a wrongful termination.

86. There was a causal connection between Plaintiff's engagement in protected activity and the retaliatory termination he suffered.

87. Defendant ROC engaged in illegal retaliation because Plaintiff had complained of discrimination.

88. Defendant had no legitimate business reason for the termination.

89. As a result of Defendant ROC's illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendants ROC'S discriminatory practices unless and until this Court grants relief.

SIXTH CAUSE OF ACTION:

**GENDER DISCRIMINATION IN VIOLATION OF NEW YORK STATE
HUMAN RIGHTS LAW EXECUTIVE LAW § 290, et seq. AGAINST
DEFENDANT ROC BY PLAINTIFF SIGUTE MEILUS**

90. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.

91. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied gender discrimination by subjecting Plaintiff to disparate treatment and wrongful termination based on gender in violation of New York State Human Rights Law, ("NYSHRL") Executive § 290, et seq.

92. Defendant ROC, at all times relevant herein had actual and constructive knowledge of the conduct described herein.

93. As a result of this discrimination, Plaintiff suffered and continued to suffer from severe emotional distress.

94. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct of Defendant ROC described above was done with a

conscious disregard for her rights, and with the intent, design, and purpose of injuring her.

95. Plaintiff is further informed and believes that Defendant ROC authorized, condoned and/or ratified the unlawful conduct alleged herein, specifically.

96. Defendant ROC failed to comply with the duty to take all reasonable and necessary steps to eliminate discrimination from the workplace and to prevent it from occurring in the future.

97. As a direct and proximate result of the Defendant ROC's willful, knowing and intentional discrimination against her, Plaintiff has suffered and will continue to suffer pain and suffering and extreme and severe mental anguish and emotional anguish and emotional distress; and for other incidental expenses, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

SEVENTH CAUSE OF ACTION:

AGE DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW EXECUTIVE LAW § 290, et seq. AGAINST DEFENDANT ROC BY PLAINTIFF SIGUTE MEILUS

98. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.

99. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied age discrimination by subjecting Plaintiff to disparate treatment

and wrongful termination based on age in violation of New York State Human Rights Law, (“NYSHRL”) Executive § 290, et seq.

100. Defendant ROC, at all times relevant herein had actual and constructive knowledge of the conduct described herein.

101. As a result of this discrimination, Plaintiff suffered and continued to suffer from severe emotional distress.

102. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct of Defendant ROC described above was done with a conscious disregard for her rights, and with the intent, design, and purpose of injuring her.

103. Plaintiff is further informed and believes that Defendant ROC authorized, condoned and/or ratified the unlawful conduct alleged herein, specifically.

104. Defendant ROC failed to comply with the duty to take all reasonable and necessary steps to eliminate discrimination from the workplace and to prevent it from occurring in the future.

105. As a direct and proximate result of the Defendant ROC’s willful, knowing and intentional discrimination against her, Plaintiff has suffered and will continue to suffer pain and suffering and extreme and severe mental anguish and emotional anguish and emotional distress; and for other incidental expenses, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be

proven at trial.

EIGHTH CAUSE OF ACTION:

**RETALIATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS
LAW EXECUTIVE LAW § 290, et seq.
AGAINST DEFENDANT ROC BY PLAINTIFF SIGUTE MIELUS**

106. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above captioned paragraphs and incorporates the same as though fully set forth herein.
107. Plaintiff engaged in protected activity when she in good faith informed her employer that she was subject to discrimination based on gender. In fact, she had been deterred from previously complaining to Human Resources.
108. Plaintiff finally brought her concerns of discrimination to leadership and particularly Director Sekou. No remedial action was taken by Defendant ROC and she was instead retaliated against for having made those complaints.
109. Plaintiff, by formally protesting the conditions of her workplace with management and supervisory personnel engaged in protected activity under the New York State Human Rights Law, § 290 et seq.
110. Thereafter, Plaintiff was subject to adverse actions including but not limited to wrongful termination that were materially adverse and that would dissuade a reasonable employee such as the Plaintiff from making further complaints of discrimination in the workplace.
111. As a direct and proximate result of Defendant ROC's willful, knowing

and intentional discrimination against her, Plaintiff has suffered and will continue to suffer severe mental and emotional anguish, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at the time of trial.

NINTH CAUSE OF ACTION:

**RACE DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW EXECUTIVE LAW § 290, et seq.
AGAINST DEFENDANT ROC BY PLAINTIFF LAURA EKAU TAYLOR**

112. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.
113. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied race discrimination by subjecting Plaintiff to disparate treatment and wrongful termination based on race in violation of New York State Human Rights Law, (“NYSHRL”) Executive § 290, et seq.
114. Defendant ROC, at all times relevant herein had actual and constructive knowledge of the conduct described herein.
115. As a result of this discrimination, Plaintiff suffered and continued to suffer from severe emotional distress.
116. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct of Defendant ROC described above was done with a conscious disregard for her rights, and with the intent, design, and purpose of injuring her.

117. Plaintiff is further informed and believes that Defendant ROC authorized, condoned and/or ratified the unlawful conduct alleged herein, specifically.

118. Defendant ROC failed to comply with the duty to take all reasonable and necessary steps to eliminate discrimination from the workplace and to prevent it from occurring in the future.

119. As a direct and proximate result of the Defendant ROC's willful, knowing and intentional discrimination against her, Plaintiff has suffered and will continue to suffer pain and suffering and extreme and severe mental anguish and emotional anguish and emotional distress; and for other incidental expenses, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

TENTH CAUSE OF ACTION:

GENDER DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW EXECUTIVE LAW § 290, et seq. AGAINST DEFENDANT ROC BY PLAINTIFF LAURA EKAU TAYLOR

120. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.

121. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied gender discrimination by subjecting Plaintiff to disparate treatment and wrongful termination based on her gender in violation of New

York State Human Rights Law, (“NYSHRL”) Executive § 290, et seq.

122. Defendant ROC, at all times relevant herein had actual and constructive knowledge of the conduct described herein.

123. As a result of this discrimination, Plaintiff suffered and continued to suffer from severe emotional distress.

124. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct of Defendant ROC described above was done with a conscious disregard for her rights, and with the intent, design, and purpose of injuring her.

125. Plaintiff is further informed and believes that Defendant ROC authorized, condoned and/or ratified the unlawful conduct alleged herein, specifically.

126. Defendant ROC failed to comply with the duty to take all reasonable and necessary steps to eliminate discrimination from the workplace and to prevent it from occurring in the future.

127. As a direct and proximate result of the Defendant ROC’s willful, knowing and intentional discrimination against her, Plaintiff has suffered and will continue to suffer pain and suffering and extreme and severe mental anguish and emotional anguish and emotional distress; and for other incidental expenses, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

ELEVENTH CAUSE OF ACTION:

AGE DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW EXECUTIVE LAW § 290, et seq. AGAINST DEFENDANT ROC BY PLAINTIFF LAURA EKAU TAYLOR

128. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above stated paragraphs and incorporates the same as though fully set forth herein.
129. Defendant ROC, through its agents, engaged in a continuing pattern of unremedied age discrimination by subjecting Plaintiff to disparate treatment and wrongful termination based on her age in violation of New York State Human Rights Law, (“NYSHRL”) Executive § 290, et seq.
130. Defendant ROC, at all times relevant herein had actual and constructive knowledge of the conduct described herein.
131. As a result of this discrimination, Plaintiff suffered and continued to suffer from severe emotional distress.
132. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct of Defendant ROC described above was done with a conscious disregard for her rights, and with the intent, design, and purpose of injuring her.
133. Plaintiff is further informed and believes that Defendant ROC authorized, condoned and/or ratified the unlawful conduct alleged herein, specifically.

134. Defendant ROC failed to comply with the duty to take all reasonable and necessary steps to eliminate discrimination from the workplace and to prevent it from occurring in the future.

135. As a direct and proximate result of the Defendant ROC's willful, knowing and intentional discrimination against her, Plaintiff has suffered and will continue to suffer pain and suffering and extreme and severe mental anguish and emotional anguish and emotional distress; and for other incidental expenses, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

TWELTH CAUSE OF ACTION:

**RETALIATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS
LAW EXECUTIVE LAW § 290, et seq.
AGAINST DEFENDANT ROC BY PLAINTIFF LAURA EKAU TAYLOR**

136. Plaintiff repeats and re-alleges by reference each and every allegation contained in the above captioned paragraphs and incorporates the same as though fully set forth herein.

137. Plaintiff engaged in protected activity when she in good faith informed her employer that she and her black members were being subject to discrimination and disparate treatment based on race and anti-blackness.

138. Plaintiff, by formally protesting the conditions of her workplace with management and supervisory personnel engaged in protected activity under the New York State Human Rights Law, § 290 et seq.

139. Thereafter, Plaintiff was subject to adverse actions including but not limited to wrongful termination that were materially adverse and that would dissuade a reasonable employee such as the Plaintiff from making further complaints of discrimination in the workplace.

As a direct and proximate result of Defendant ROC's willful, knowing and intentional discrimination against her, Plaintiff has suffered and will continue to suffer severe mental and emotional anguish, and she has suffered and will continue to suffer a loss of earnings and other employment benefits and job opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at the time of trial.

THIRTEEN CAUSE OF ACTION:

GENDER DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW AS AND AGAINST DEFENDANT SIBY SEKOU AND DEFENDANT ALICIA RENEE FARRIS, BOTH INDIVIDUALLY BY PLAINTIFF SIGUETE MEILUS

140. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

141. Defendants Sekou and Farris aided and abetted Defendant ROC in discrimination on the basis of both her gender by allowing her mistreatment and termination.

142. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will

continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

FOURTEENTH CAUSE OF ACTION:

AGE DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW AS AND AGAINST DEFENDANT SIBY SEKOU AND DEFENDANT ALICIA RENEE FARRIS, BOTH INDIVIDUALLY BY PLAINTIFF SIGUETE MEILUS

143. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

144. Defendant Sekou and Defendant Farris aided and abetted Defendant ROC in discrimination on the basis of both her age by allowing her mistreatment and termination.

145. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

FIFTEENTH CAUSE OF ACTION:

RETALIATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW AS AND AGAINST DEFENDANT SIBY SEKOU AND DEFENDANT ALICIA RENEE FARRIS, BOTH INDIVIDUALLY BY PLAINTIFF SIGUETE MEILUS

146. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

147. Defendant Sekou and Defendant Farris aided and abetted Defendant ROC in retaliation by allowing her termination.

148. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

SIXTEENTH CAUSE OF ACTION:

**RACE DISCRIMINATION IN VIOLATION OF NEW YORK STATE
HUMAN RIGHTS LAW AS AND AGAINST DEFENDANT SIBY SEKOU
AND DEFENDANT ALICIA RENEE FARRIS, BOTH INDIVIDUALLY BY
PLAINTIFF LAURA EKAU TAYLOR**

149. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

150. Defendant Sekou and Defendant Farris aided and abetted Defendant ROC in discrimination on the basis of both her race by allowing her mistreatment and termination.

151. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career

opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

SEVENTEETH CAUSE OF ACTION:

GENDER DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW AS AND AGAINST DEFENDANT SIBY SEKOU AND DEFENDANT ALICIA RENEE FARRIS, INDIVIDUALLY BY PLAINTIFF LAURA EKAU TAYLOR

152. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

153. Defendant Sekou and Defendant Farris aided and abetted Defendant ROC in discrimination on the basis of both her gender by allowing her mistreatment and termination.

154. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

EIGHTEENTH CAUSE OF ACTION:

AGE DISCRIMINATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS LAW AGAINST DEFENDANT SIBY SEKOU AND

**DEFENDANT ALICIA RENEE FARRIS, BOTH INDIVIDUALLY BY
PLAINTIFF LAURA EKAU TAYLOR**

155. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

156. Defendant Sekou and Defendant Farris aided and abetted Defendant ROC in discrimination on the basis of both her age by allowing her mistreatment and termination.

157. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

NINETEETH CAUSE OF ACTION:

**RETALIATION IN VIOLATION OF NEW YORK STATE HUMAN RIGHTS
LAW AGAINST DEFENDANT SIBY SEKOU AND
DEFENDANT ALICIA RENEE FARRIS BOTH INDIVIDUALLY
BY PLAINTIFF LAURA EKAU TAYLOR**

158. Plaintiff repeats and re-alleges every allegation contained in the preceding paragraphs with the same force and effect as though fully set forth herein.

159. Defendant Sekou and Defendant Farris aided and abetted Defendant ROC in retaliation by allowing her termination.

160. As a result of Defendants' illegal actions, Plaintiff has suffered loss of past and future income in the form of salary and benefits, loss of career opportunity, injury to her health, emotional distress, mental anxiety, loss of enjoyment of life, damage to her reputation and humiliation. Plaintiff will continue to suffer these irreparable injuries and monetary damages as a result of Defendant's discriminatory practices unless and until this Court grants relief.

WHEREFORE, Plaintiffs demands judgment in their favor on all of the above stated causes of action.

Dated: March 26, 2021
Buffalo, New York

/s/Prathima Reddy
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