

United States Courts  
Southern District of Texas  
FILED

SEP 04 2014

David J. Bradley  
Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

Toni Marek

versus

Phi Theta Kappa Honor Society  
And Executive Director, Dr. Rod  
Risley

§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 6:14 cv 55  
6:14 mc 9

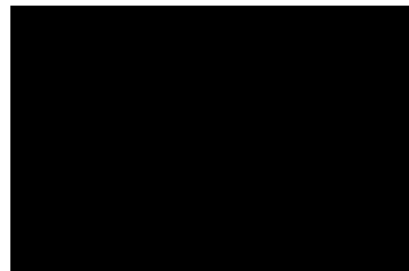
EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought by Toni Marek, the Plaintiff, pursuant to the following jurisdiction: Title VII of the Civil Rights Act of 1964 (42 USC §§ 2000e et seq.) Employment Discrimination on the basis of race, color, sex (gender, pregnancy, and sexual harassment), religion or national origin.

2. The Plaintiff is:

Toni Marek

Address:



County of Residence:

3. The Defendant is:

Phi Theta Kappa Honor Society and  
Executive Director, Dr. Rod Risley

Address:

1625 Eastover Drive

Jackson, Mississippi 39211

4. The Plaintiff has attached to this complaint a copy of the charges filed on April 28, 2014 with the Equal Opportunity Commission.

5. On the date of June 5, 2014, the Plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the Plaintiff's sex the Defendant has terminated the Plaintiff's employment, failed to promote the Plaintiff, and denied future employment to the Plaintiff.

7. The Plaintiff was first discriminated against on May 23, 2013. During a morning photo session at the Phi Theta Kappa Headquarters in Jackson, Mississippi, Dr. Rod Risley touched and squeezed the buttocks of the Plaintiff.

8. The Plaintiff was discriminated against again on January 10, 2014 during a mandatory Phi Theta Kappa dinner in Jackson, Mississippi. During the dinner, the Defendant, Dr. Rod Risley rubbed and touched the Plaintiff on the inner left thigh, right shoulder, and back.

9. The Defendant terminated the Plaintiff's employment on January 11, 2014.

10. The Defendant emailed libelous and false statements about the Plaintiff on February 25, 2014 that was distributed among higher education administration and professionals within the 1294 chapters of Phi Theta Kappa worldwide.

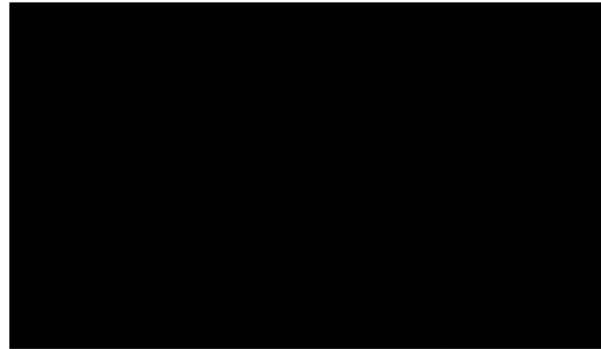
11. The Defendant made slanderous statements to higher education administration and/or professionals against the Plaintiff during the period of January 10, 2014 through April 30, 2014 concerning the Plaintiff's professional behavior and mental state.

12. The Plaintiff requests that the Defendant be ordered to stop discriminating against the Plaintiff, to re-employ the Plaintiff, to reinstate the Plaintiff, and to; cease, desist, and refute publicly and professionally all libelous, slanderous, and defamatory claims made against the Plaintiff, and to; award the Plaintiff all benefits owed to the Plaintiff for reinstatement, and the

maximum amount within the jurisdiction of the court for discrimination, libel, and slander, and that; the Court grant other relief, including injunctions, damages, costs, court costs, and attorney's fees.

A black rectangular redaction box covering the signature of the plaintiff.

(Signature of Plaintiff)

A large black rectangular redaction box covering the signature of the plaintiff.