

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANDREA NICHOLLE BROCK,

Plaintiff,

V.

**CITY OF ATLANTA
FIRE-RESCUE DEPARTMENT,**

Defendant.

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW Plaintiff, Andrea Nicholle Brock, by and through undersigned counsel, The Kirby G. Smith Law Firm, LLC, and hereby files this Complaint, and states as follows:

I. JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 over Counts I-IV of this Complaint, which arise from Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000 et seq. (“Title VII”).
2. This Court has personal jurisdiction over the parties because a substantial

portion of the employment practices described herein were committed within Fulton County, Georgia.

3. Plaintiff exhausted all administrative remedies in this matter. *Dismissal and Notice of Rights*, Ex. 1.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

II. PARTIES

5. Plaintiff is a citizen of the United States and a resident of Cobb County, Georgia.

6. Defendant is a governmental entity based in Fulton County, Georgia.

7. Defendant may be served by delivering a copy of the Complaint and Summons to Fire Chief Roderick M. Smith, located at 226 Peachtree Street, SW Atlanta GA 30303.

8. Defendant is subject to the requirements of the laws enumerated in the Jurisdiction and Venue section of this Complaint.

III. FACTUAL ALLEGATIONS

10. Plaintiff has been employed by Defendant since January 17, 2002.

11. Plaintiff has been promoted multiple times during her career with Defendant.

12. During the events in question, Plaintiff was employed by Defendant as a Fire

Captain.

13. Upon knowledge and belief, the decision to discipline Plaintiff was made by Interim Chief Randall Slaughter.

14. Upon information and belief, the decision not to promote Plaintiff was made by Interim Chief Slaughter in 2020 and Chief Roderick Smith in 2021.

15. Plaintiff is a member of a protected class by virtue of her gender (female).

16. Defendant was aware of Plaintiff's protected class by at least her first day of in-person work.

17. On May 24, 2017, Plaintiff complained to Assistant Chief Chris Wessels that her male co-workers were being treated more favorably than their female co-workers.

18. On June 5, 2017, Plaintiff was accused of multiple patient care violations by Defendant Medical Director, Dr. Mark Waterman.

19. After investigation, the accusations against Plaintiff were substantiated by Defendant.

20. On October 9, 2017, Plaintiff was suspended 15 days without pay.

21. Plaintiff appealed Defendant's decision substantiating the allegations to the Civil Service Board.

22. While the appeal was pending, Plaintiff was disqualified from promotion to an EMS Supervisor position.

23. Upon information and belief, Dr. Waterman instructed EMS Supervisor, Mr. Ezio Correa, not to swap positions with Plaintiff or otherwise allow her to become an EMS Supervisor, even temporarily.

24. Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission on October 16, 2017.

25. The Civil Service Board overturned Defendant's findings regarding the patient safety issues in March, 2020.

26. Upon information and belief, a delay of nearly three years between a disciplinary action and a Civil Service Board hearing is uncommon.

27. Approximately two weeks after the Civil Service Board decision, Defendant posted six EMS Supervisor vacancies.

28. Plaintiff stated her interest in filling one of the six vacancies.

29. Plaintiff was not selected for any of the six vacancies.

30. All six vacancies were filled by male candidates.

31. Defendant claims Plaintiff was not selected because she did not follow the formal application process for the March 2020 vacancies.

32. Upon information and belief, at least three of the six selectees did not follow the formal application process for the March 2020 vacancies.

33. Upon information and belief, Plaintiff is clearly more qualified than at least five of the six selectees for the March 2020 vacancies based on her education, experience, and job performance history with Defendant.

34. Plaintiff received her Dismissal and Notice of Rights on November 15, 2021.

IV. CLAIMS FOR RELIEF

COUNT I: TITLE VII DISCRIMINATION (GENDER - FAILURE TO PROMOTE)

39. Plaintiff incorporates by reference paragraphs 1-34 of her Complaint as if fully set forth herein.

40. Plaintiff is a member of a protected class by virtue of her gender (female).
Para. 15-16.

41. Plaintiff was qualified for the position at issue. *Paras. 10-12.*

42. Plaintiff was not promoted to the EMS Supervisor positions advertised in March 2020. *Para. 29.*

43. The selectees for the EMS Supervisor positions advertised in March 2020

were all male. *Para. 30.*

44. Plaintiff is clearly more qualified for the position than at least five of six selectees. *Para. 33.*

45. Defendant's reason for Plaintiff's non-selection is pretextual. *Paras. 31-32.*

COUNT II: TITLE VII DISCRIMINATION (GENDER - HARASSMENT)

46. Plaintiff incorporates by reference paragraphs 1-45 of her Complaint as if fully set forth herein.

47. Plaintiff is a member of a protected class by virtue of her gender (female). *Para. 15-16.*

48. Plaintiff is a qualified employee. *Paras. 10-12.*

49. Plaintiff suffered pervasive harassment when she was blocked from obtaining a promotion for multiple years. *Paras. 18-23.*

50. Defendant acted with discriminatory intent when it disciplined Plaintiff for a charge that was later found to be unsubstantiated. *Paras. 18-31.*

COUNT III - RETALIATION (HOSTILE WORK ENVIRONMENT)

51. Plaintiff incorporates by reference paragraphs 1-50 of her Complaint as if fully set forth herein.

52. Plaintiff is a qualified employee. *Paras. 10-12.*

53. Plaintiff participated in multiple protected activities. *Paras. 17, 24*
54. Defendant had knowledge of Plaintiff's protected activities. *Paras. 17, 24.*
55. Plaintiff was thereafter improperly disciplined by Defendant. *Para. 18-23, 25-26.*
56. The temporal proximity between Plaintiff's protected activities and her improper discipline create an inference of causation.
57. As a result of Defendant's actions, Plaintiff was unable to seek a promotion for multiple years. *Paras. 18-26.*
58. Defendant's actions gave rise to a hostile work environment.

COUNT IV: RETALIATION (FAILURE TO PROMOTE)

59. Plaintiff incorporates by reference paragraphs 1-59 of her Complaint as if fully set forth herein.
60. Plaintiff participated in multiple protected activities. *Paras. 17, 24.*
61. Defendant had knowledge of Plaintiff's protected activities. *Paras. 17, 24.*
62. Plaintiff was barred from promotions with Defendant for multiple years. *Para. 18-23, 25-26.*
63. Plaintiff was qualified for the position at issue. *Paras. 10-12.*
64. Plaintiff was not promoted to the EMS Supervisor positions advertised in

March 2020. *Para. 29.*

65. Plaintiff is clearly more qualified for the position than at least five of six selectees. *Para. 32.*

66. Because this was Plaintiff's first application after being barred from promotion, the temporal proximity between Plaintiff's non-selection and her protected activities infers causation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Honorable Court grant:

- a. A trial by jury;
- b. A finding that Defendant violated Plaintiff's rights as set forth herein;
- c. An injunction requiring Plaintiff's promotion to the EMS Supervisor position, or in the alternate front pay;
- d. Full back pay plus interest, front pay, compensatory damages, punitive damages, reasonable attorney fees, and costs in accordance with Title VII, to exceed \$25,000; and
- e. Any other relief this Court deems proper and just.

Respectfully submitted this 11th day of February, 2022.

THE KIRBY G. SMITH LAW FIRM, LLC
s/Kirby G. Smith
Kirby G. Smith
Georgia Bar No. 250119
Amanda Brookhuis
Georgia Bar No. 601396
Attorneys for Plaintiff

4488 North Shallowford Road
Suite 105
Atlanta, GA 30338
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amb@kirbygsmith.com

JURY DEMAND

Plaintiff requests a jury trial on all questions of fact raised by this Complaint.

Respectfully submitted this 11th day of February, 2022.

THE KIRBY G. SMITH LAW FIRM, LLC

s/Kirby G. Smith

Kirby G. Smith

Georgia Bar No. 250119

Attorney for Plaintiff

THE KIRBY G. SMITH LAW FIRM, LLC

4488 North Shallowford Road

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FONT AND POINT CERTIFICATION

The Undersigned counsel for Plaintiff certifies that the within and foregoing COMPLAINT was prepared using Times New Roman, 14-point font in accordance with LR 5.1(B).

Respectfully submitted this 11th day of February, 2022.

THE KIRBY G. SMITH LAW FIRM, LLC

s/Kirby G. Smith
Kirby G. Smith
Georgia Bar No. 250119
Attorney for Plaintiff

THE KIRBY G. SMITH LAW FIRM, LLC
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kgs@kirbygsmith.com

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Andrea Brock**
5833 Hill Road
Powder Springs, GA 30127

From: **Atlanta District Office**
100 Alabama Street, S.W.
Suite 4R30
Atlanta, GA 30303

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
410-2020-05776	Matthieu Linen, Investigator	(470) 531-4782

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (*briefly state*)

- NOTICE OF SUIT RIGHTS -
(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


November 15, 2021

Enclosures(s)

Darrell E. Graham,
District Director

(Date Issued)

cc: **Walter C. Mobley**
EEOC Manager
City of Atlanta
68 Mitchell Street, SW
Suite 2170
Atlanta, GA 30303

CIVIL COVER SHEET

The JS44 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 is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S)

Andrea Nicholle Brock

DEFENDANT(S)

City of Atlanta Fire-Rescue Department

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Cobb
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

Fulton
(IN U.S. PLAINTIFF CASES ONLY)

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

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Kirby G. Smith
The Kirby G. Smith Law Firm, LLC
4488 North Shallowford Road
Suite 105
Atlanta, GA 30338

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) (FOR DIVERSITY CASES ONLY)

- | | | | | | |
|----------------------------|----------------------------|---|----------------------------|----------------------------|---|
| PLF | DEF | | PLF | DEF | |
| <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | CITIZEN OF THIS STATE | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | CITIZEN OF ANOTHER STATE | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | CITIZEN OR SUBJECT OF A FOREIGN COUNTRY | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | FOREIGN NATION |

IV. 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 District)
- 6 MULTIDISTRICT LITIGATION - TRANSFER
- 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT
- 8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000 et seq.

(IF COMPLEX, CHECK REASON BELOW)

- 1. Unusually large number of parties.
- 2. Unusually large number of claims or defenses.
- 3. Factual issues are exceptionally complex.
- 4. Greater than normal volume of evidence.
- 5. Extended discovery period is needed.
- 6. Problems locating or preserving evidence.
- 7. Pending parallel investigations or actions by government.
- 8. Multiple use of experts.
- 9. Need for discovery outside United States boundaries.
- 10. Existence of highly technical issues and proof.

CONTINUED ON REVERSE

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT \$ _____ APPLYING IFP _____ MAG. JUDGE (IFP) _____
 JUDGE _____ MAG. JUDGE _____ (Referral) NATURE OF SUIT _____ CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT - "0" MONTHS DISCOVERY TRACK

- 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- 110 INSURANCE
- 120 MARINE
- 130 MILLER ACT
- 140 NEGOTIABLE INSTRUMENT
- 151 MEDICARE ACT
- 160 STOCKHOLDERS' SUITS
- 190 OTHER CONTRACT
- 195 CONTRACT PRODUCT LIABILITY
- 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 210 LAND CONDEMNATION
- 220 FORECLOSURE
- 230 RENT LEASE & EJECTMENT
- 240 TORTS TO LAND
- 245 TORT PRODUCT LIABILITY
- 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- 310 AIRPLANE
- 315 AIRPLANE PRODUCT LIABILITY
- 320 ASSAULT, LIBEL & SLANDER
- 330 FEDERAL EMPLOYERS' LIABILITY
- 340 MARINE
- 345 MARINE PRODUCT LIABILITY
- 350 MOTOR VEHICLE
- 355 MOTOR VEHICLE PRODUCT LIABILITY
- 360 OTHER PERSONAL INJURY
- 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- 365 PERSONAL INJURY - PRODUCT LIABILITY
- 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 370 OTHER FRAUD
- 371 TRUTH IN LENDING
- 380 OTHER PERSONAL PROPERTY DAMAGE
- 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- 422 APPEAL 28 USC 158
- 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- 440 OTHER CIVIL RIGHTS
- 441 VOTING
- 442 EMPLOYMENT
- 443 HOUSING/ ACCOMMODATIONS
- 445 AMERICANS with DISABILITIES - Employment
- 446 AMERICANS with DISABILITIES - Other
- 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- 462 NATURALIZATION APPLICATION
- 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- 463 HABEAS CORPUS- Alien Detainee
- 510 MOTIONS TO VACATE SENTENCE
- 530 HABEAS CORPUS
- 535 HABEAS CORPUS DEATH PENALTY
- 540 MANDAMUS & OTHER
- 550 CIVIL RIGHTS - Filed Pro se
- 555 PRISON CONDITION(S) - Filed Pro se
- 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- 550 CIVIL RIGHTS - Filed by Counsel
- 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- 710 FAIR LABOR STANDARDS ACT
- 720 LABOR/MGMT. RELATIONS
- 740 RAILWAY LABOR ACT
- 751 FAMILY and MEDICAL LEAVE ACT
- 790 OTHER LABOR LITIGATION
- 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- 820 COPYRIGHTS
- 840 TRADEMARK
- 880 DEFEND TRADE SECRETS ACT OF 2016 (DTSA)

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- 830 PATENT
- 835 PATENT-ABBREVIATED NEW DRUG APPLICATIONS (ANDA) - a/k/a Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- 861 HIA (1395f)
- 862 BLACK LUNG (923)
- 863 DIWC (405(g))
- 863 DIWW (405(g))
- 864 SSID TITLE XVI
- 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- 870 TAXES (U.S. Plaintiff or Defendant)
- 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- 375 FALSE CLAIMS ACT
- 376 Qui Tam 31 USC 3729(a)
- 400 STATE REAPPORTIONMENT
- 430 BANKS AND BANKING
- 450 COMMERCE/ICC RATES/ETC.
- 460 DEPORTATION
- 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- 480 CONSUMER CREDIT
- 485 TELEPHONE CONSUMER PROTECTION ACT
- 490 CABLE/SATELLITE TV
- 890 OTHER STATUTORY ACTIONS
- 891 AGRICULTURAL ACTS
- 893 ENVIRONMENTAL MATTERS
- 895 FREEDOM OF INFORMATION ACT 899
- 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTI TRUST
- 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND YES NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case IS IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

s/Kirby G. Smith

2/11/22

SIGNATURE OF ATTORNEY OF RECORD

DATE