

INTRODUCTION

2. Ms. Keith was employed by the Party from June 19, 2013 to March 31, 2014, when she was terminated as a result of her complaints about the discriminatory treatment she received in the workplace on account of her race.

3. Ms. Keith has satisfied all of her administrative pre-requisites to filing. On July 7, 2014, Ms. Keith received her Notice of Right to Sue from the United States Equal Opportunity Employment Commission, a copy of which is attached hereto as “**Exhibit A.**”

JURISDICTION AND VENUE

4. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1343(a)(4) and 28 U.S.C. §§ 2201 and 2202.

5. This Court is an appropriate venue for all of Ms. Keith’s claims under 28 U.S.C. §§ 1391(b) and 1391(d) because the Party conducts business in this district and division and the Defendants’ unlawful actions and practices alleged herein were committed within the Northern District of Georgia.

THE PARTIES

6. Ms. Keith is a citizen of the State of Georgia and a resident of Hall County, Georgia. She submits herself to the jurisdiction of this Court.

7. Defendant Padgett is a citizen of the State of Georgia. Padgett is sued in his official capacity as the Chairman of the Party and may be personally served with process by delivering a copy of the Complaint and summons to him at his place of business at the Party: 3110 Maple Drive, Suite 150, Atlanta, Georgia 30305.

8. Defendant Georgia Republican Party is a registered political party as defined under Georgia law, O.C.G.A. §§ 21-2-2(25) and 21-2-110. The Party transacts business in the Northern District of Georgia and is primarily based out of offices located at 3110 Maple Drive, Suite 150, Atlanta, Georgia 30305, and may be served with process by delivering a copy of the Complaint and summons to its Chairman and Chief Executive Officer, John Padgett.

9. Defendant Georgia Republican Party, Inc., is a Georgia non-profit Corporation. Defendant Georgia Republican Party, Inc., transacts business in the Northern District of Georgia and may be served with process by delivering a copy of the Complaint and summons to its registered agent, Anne Lewis, 1170 Peachtree Road, Suite 2200, Atlanta, Georgia, 30309.

10. Upon information and belief, Georgia Republican Party, Inc., is a successor-in-interest to the Georgia Republican Party. Given that the adverse actions against Ms. Keith occurred both before and after the creation of the

Georgia Republican Party, Inc., Ms. Keith alleges that both entities are responsible for the unlawful conduct alleged herein.

THE FACTS

11. Ms. Keith is a supporter of the Georgia Republican Party, and has worked in various volunteer jobs within the organization, including, but not limited to, the Hall County Republican Party, Michael Hardin's legislative office located in the Capitol, and as an unpaid intern for a Republican radio personality.

12. In or around May of 2013, Ms. Keith was asked by one of the persons for whom she interned if she would consider working for Padgett, the newly elected chairman of the Party.

13. In June 2013, Ms. Keith began her employment with the Party as the Executive Assistant to Chairman Padgett. Ms. Keith's supervisor at the Party was Adam Pipkin ("Pipkin").

14. In her position as Padgett's assistant, Ms. Keith's job responsibilities included maintaining Padgett's calendar, answering the phones during the day, and attending all events with Padgett as his escort. In addition, Ms. Keith was required to attend events that were sponsored by the Party and to assist wherever she was needed.

15. Initially, Ms. Keith worked well with her co-workers, and received commendations on her work performance. However, it soon became clear that Ms. Keith's race set her apart from her co-workers, and she was treated differently throughout her employment.

16. In or around August of 2013, Ms. Keith was in the office working with a group of volunteers. Karen Hentschel ("Hentschel"), the Party's Accounting Director, saw the group of volunteers walk by her office and appeared annoyed by Ms. Keith. Hentschel then stated: "What the fuck are they doing here?" Hentschel's statement was made in front of Ms. Keith's co-workers and the group of volunteers. Ms. Keith had never heard Hentschel speak in this manner to anyone in the office.

17. When Ms. Keith went to speak to Hentschel about her offensive comment in the workplace, Hentschel replied that Ms. Keith was walking around the office like she was the "Queen Bee."

18. Ms. Keith was upset about this conversation and tried to speak to Pipkin about what happened. After Pipkin ignored her report, Ms. Keith asked Hentschel to join her for lunch, which Hentschel accepted and then canceled.

19. In the Fall of 2013, Ms. Keith was again confronted by Hentschel who chastised her for parking in the spaces located in front of the building which were

reserved for visitors and Padgett. Ms. Keith advised Hentschel that Padgett had told her she could park in his spot when he was not in the office. Hentschel persisted in chastising Ms. Keith and demanded that she park on the side of the building. Hentschel was not Ms. Keith's supervisor.

20. Ms. Keith was dumbfounded at Hentschel's aggressive statements about the parking spots because she knew the Party did not have assigned parking (except for the spot reserved for the Chairman) because there were not enough reserved spots to accommodate all of the employees who worked for the Party.

21. Ms. Keith went to discuss the issue with Pipkin who told her that there were no assigned parking spots and that she should park wherever she wanted to park, including in the front of the building. Ms. Keith complied with Pipkin's directive and again parked in front of the building when she arrived to work.

22. Hentschel persisted and confronted Ms. Keith again when she arrived at work, stating "I told you not to park in front of the building."

23. Ms. Keith did not want issues with her co-workers, so she began to park on the side of the building in the spots reserved for the Party.

24. One day in or around October of 2013, Ms. Keith parked in a spot on the side of the building and left the spot when she left for lunch. When she returned, Margaret Poteet ("Poteet"), the Party's recently hired Finance Director,

had parked in the spot Ms. Keith had previously used that morning. Ms. Keith thought nothing of it and parked where she could find a spot.

25. The next day, when Ms. Keith pulled into a space on the side of the building, Hentschel suddenly banged on Ms. Keith's window and told her not to park in that spot either, because it "belonged" to Poteet, and Poteet was "upset" about Ms. Keith parking in "her" spot.

26. Ms. Keith then went to speak to Poteet, as Ms. Keith was undeniably upset and confused. When Ms. Keith relayed Hentschel's comments to Poteet she (Poteet) replied that she was not upset, that it was only a parking spot, and they did not have assigned parking.

27. That same day, Ms. Keith received an email from another co-worker, demanding to know why Ms. Keith was parking in "Margaret's spot."

28. Ms. Keith again went to try to talk to Pipkin who was visibly annoyed. Pipkin instructed Ms. Keith to not "make trouble" with Poteet and Hentschel and suddenly directed Ms. Keith to park in the last available spot at the end of all of the spaces for the Party.

29. Pipkin issued this directive to Ms. Keith even though he was well aware she was often worked later than the other employees. For example, on

Friday afternoon all of the employees were allowed to leave early with the exception of Ms. Keith.

30. This discriminatory behavior then permeated the rest of Ms. Keith's employment up until the date of her termination. Ms. Keith was repeatedly treated differently and put in demeaning situations by her co-workers.

31. For example, all of the staff was required to attend the events for the Party. Ms. Keith would often arrive early only to find out that Poteet, who was responsible for making assignments for Party events, refused to assign Ms. Keith any tasks to handle at a given event.

32. In at least one instance, when Ms. Keith inquired as to her job duties for the function, she was told by Poteet that she could "clean up."

33. At the Chairman's Dinner in 2013, Ms. Keith was expected to attend as the Chairman's escort and aide. When Ms. Keith arrived, however, Poteet had given the post to a white male. After Ms. Keith arrived, she checked her email and saw that Poteet had prepared an excel sheet with the assignments for the dinner and that she (Ms. Keith) was left off.

34. Ms. Keith was again humiliated as she knew that in previous years, the Chairman's executive assistant attended the dinner as the Chairman's escort and aide, based on several conversations Ms. Keith had with former Chairperson

Sue Everhart's assistant who had given Ms. Keith pointers on how to be a good assistant to Padgett.

35. Ms. Keith complained to Pipkin about the treatment she received at the Chairman's dinner, but he refused to listen to her. Instead, Pipkin responded by telling her that she made a mistake by seating a black member of the Republican Party at the head table with the Chairman. Ms. Keith explained that she was just doing what she was told because Hentschel told her to "fill the fucking seats" when Ms. Keith asked about an empty seat at the Chairman's table, but Pipkin ignored her.

36. Around the same time period as the Chairman's Dinner, Ms. Keith overheard Poteet complaining to Hentschel about her (Ms. Keith). Hentschel responded, "Don't worry about her; she is just the house nigger."

37. Shortly thereafter, Ms. Keith arrived at an event at the Augusta Country Club where, yet again, there were no tasks assigned to her. Incredibly, Hentschel approached her and asked her why she even showed up at the event, as if Ms. Keith had no business being there. Ms. Keith was again humiliated, as she had driven from Gainesville to Augusta to attend the event with her husband.

38. Ms. Keith tried to discuss all of these issues with Pipkin, but he refused to intervene on her behalf, repeatedly telling her that it was something she did or created that cause the conduct.

39. For example, when Ms. Keith attended a function in Marietta, Ga. Poteet ordered her to stand by a table as if she was a member of the wait staff because she (Poteet) forgot the place cards and did not want anyone to sit there. When Ms. Keith told Pipkin about this treatment, he criticized her use of grammar and punctuation in Padgett's calendar.

40. Shortly thereafter, Ms. Keith received paperwork at her home from the State of Montana which notified her that the Party would be required to garnish Ms. Keith's wages for restitution she owed for a felony she pled guilty to in 2002.

41. After receiving the paperwork, Ms. Keith called Hentschel, the Party's Accounting Director, informed her of the garnishment, and explained that she did not intend to contest the garnishment as she wanted the funds to be withdrawn immediately from her paycheck in order to satisfy the balance of the garnishment.

42. After Ms. Keith notified Hentschel of the garnishment, Ms. Keith overheard a conversation between Poteet and Hentschel taking place before a staff meeting, in which Poteet stated, "I didn't even know there were black people in Montana."

43. Four days later, Ms. Keith received an email from Hentschel notifying Ms. Keith that the Party received the garnishment. Upon receiving Hentschel's email, Ms. Keith suddenly realized that the racist comments made at the staff meeting about blacks in Montana were about her and that, obviously, Hentschel had told Poteet about her garnishment. Ms. Keith was humiliated as the comment was made in an open forum where other employees were beginning to assemble for the meeting, and Poteet and Hentschel were again disparaging her because of her race.

44. By February 3, 2014, Ms. Keith had had enough of the treatment she received in the office and her supervisor's failure to intervene on her behalf. Ms. Keith was furious about the manner in which she was treated with respect to her garnishment and about her co-workers' racist comments about black people in Montana. Ms. Keith knew that other white employees would not have been subjected to such an open discourse about their personal confidential matters in the workplace.

45. That day, Ms. Keith sent an email to Pipkin complaining about the treatment she received, including the handling of her garnishment paperwork, the racial slurs and innuendo in the workplace, and the racially discriminatory and offensive treatment she had endured in the workplace.

46. In the February 3, 2014 email, Ms. Keith reminded Pipkin that she had attempted to discuss the treatment with him before, referring to “the countless occasions where I have come to you instance after instance but to no avail.”

47. In the February 3, 2014 email, Ms. Keith informed Pipkin that she:

refuse[d] to be anyone’s punching bag or trash can for their issues for reasons that I know have nothing to do with my job performance. Honestly, maybe some people think I work here only because I am black and of course not valued and therefore consistently harassed and evidenced to you on a number of occasions. . . that is against the law as well sir.

48. Ms. Keith further informed Pipkin in the February 3, 2014 email that she had “overheard racial slurs in conversations about myself.” Ms. Keith went on to say, “. . . [the amount of] racist innuendo around the office more than I would like to admit to.”

49. Pipkin only responded to the portion of the email where Ms. Keith was distressed about the garnishment paperwork. At no time did Pipkin ask Ms. Keith about the racial comments and treatment she received in the workplace.

50. Within days of the email exchange on February 3, 2014, Pipkin and Ms. Keith met in the office.

51. In that meeting, Ms. Keith explained to Pipkin she was so upset about the garnishment paperwork due to the comments that Hentschel made to Poteet the day of the staff meeting about black people in Montana. Ms. Keith explained her

feelings that her garnishment should not have been discussed with Poteet, and it was yet another instance where her race set her apart from the other people in the office.

52. At no time did Ms. Keith object to the employees or the Party discussing her status as a convicted felon, as this was not something she sought to conceal from any of her employers. Ms. Keith was referred to the Party by a radio personality for whom she had interned during a political campaign, and Ms. Keith had told the radio personality about her conviction the moment she learned that she was being considered for the intern position. Through this radio personality, the Party was aware of Ms. Keith's felony conviction prior to receiving the garnishment.

53. In the meeting after the February 3, 2014 email, Pipkin agreed that Poteet had no reason to be told about Ms. Keith's garnishment, and he told Ms. Keith that she must have "misunderstood" the comments because Poteet "would not have made comments of this nature."

54. In that meeting, Ms. Keith reported the other treatment she was subjected to on account of her race, including the racial slurs and discriminatory treatment she received from her co-workers. However, upon hearing Ms. Keith's

complaints, Pipkin ignored her report and appeared to back up the employees by defending their actions as something Ms. Keith must have “misunderstood.”

55. At the conclusion of the conversation, Ms. Keith reiterated her complaints about rampant racist comments in the workplace and about the treatment she received by her co-workers.

56. Ms. Keith specifically stated at that meeting, “If I have to endure racist conduct at the Party, I do not want to work here.”

57. After Ms. Keith’s written and verbal complaints of racism in the workplace, neither Pipkin nor anyone else at the Party conducted any type of investigation into her allegations. In fact, Ms. Keith’s complaints were ignored and never spoken of again by her supervisor.

58. Instead, within a few weeks after Ms. Keith complained about the discriminatory comments and actions in the workplace, she received two emails from Pipkin wherein he found fault with her allegedly poor performance in the office and at a charity event.

59. On March 31, 2014, Mr. Keith was terminated for purported performance issues.

60. Throughout the duration of her employment at the Party, Ms. Keith never received any disciplinary action or formal write ups for her alleged performance related issues.

COUNT I

Race Discrimination – 42 U.S.C. § 1981

61. Ms. Keith incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

62. At all times material to this Complaint, Ms. Keith and the Party were parties to an employment agreement under which Ms. Keith provided services to Defendants, and Defendants were required to, among other things, compensate her for her services.

63. Ms. Keith performed her obligations under this employment agreement.

64. Defendants' above-pled discriminatory conduct toward Ms. Keith constitutes intentional and unlawful race discrimination against Ms. Keith's rights, in violation of 42 U.S.C. § 1981.

65. By failing and refusing to conduct an investigation into Ms. Keith's allegations of discriminatory conduct in the workplace, Defendants ratified and condoned the discriminatory behavior of its employees.

66. As a result of Defendants' unlawful actions, Ms. Keith has suffered lost compensation and other benefits of employment, emotional distress, inconvenience, loss of income, humiliation, damage to her reputation, and other indignities, in an amount to be proven at trial.

67. Defendants willfully and wantonly disregarded Ms. Keith's rights, and Defendants' discrimination against Ms. Keith was undertaken in bad faith and with reckless indifference to Ms. Keith's rights which entitles Ms. Keith to punitive damages pursuant to 42 U.S.C. §1981.

68. Ms. Keith is entitled to her reasonable attorney's fees pursuant to 42 U.S.C. § 1988.

COUNT II

Retaliation in violation of 42 U.S.C. § 1981

69. Ms. Keith incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

70. Defendants' actions in terminating Ms. Keith's employment following her complaints of discrimination were committed with reckless disregard for Ms.

Keith's right to be free from discriminatory treatment on account of her opposition to discriminatory practices and in violation of 42 U.S.C. § 1981.

71. The unlawful actions taken against Ms. Keith have caused her to suffer both monetary and non-monetary damages.

72. Accordingly, Ms. Keith is entitled to the equitable and monetary relief set forth in the following prayer for relief for Defendants' violation of her rights under the Civil Rights Act of 1866, as amended by the Civil Rights Act of 1991, 42 U.S.C. § 1981.

73. Defendants willfully and wantonly disregarded Ms. Keith's rights, and Defendants' unlawful actions against Ms. Keith were undertaken in bad faith and with reckless indifference to Ms. Keith's rights which entitles Ms. Keith to punitive damages pursuant to 42 U.S.C. §1981.

74. Ms. Keith is entitled to her reasonable attorney's fees pursuant to 42 U.S.C. § 1988.

COUNT III

Retaliation in Violation of Title VII

75. Ms. Keith incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

76. Defendants terminated Ms. Keith in retaliation for her complaints that she was subjected to discrimination on account of her race and that Defendants engaged in illegal discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, *et. seq.*

77. The unlawful actions taken against Ms. Keith have caused her to suffer both monetary and non-monetary damages.

78. Ms. Keith is entitled to an award of back pay, and benefits, compensatory damages, attorney's fees, and all other appropriate damages, remedies, and other relief available under Title VII and all federal statutes providing remedies for violations of Title VII, including 42 U.S.C. §§ 1981a and 2000e-5.

79. Defendants willfully and wantonly disregarded Ms. Keith's rights, and Defendants' unlawful actions against Ms. Keith were undertaken in bad faith and with reckless indifference to Ms. Keith's rights which entitles Ms. Keith to punitive damages pursuant to 42 U.S.C. §1981a.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands a TRIAL BY JURY and requests the following relief:

(a) That Plaintiff be awarded a declaratory judgment that Defendants are in violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981 and Title VII of the Civil Rights Act, as amended, 42 U.S.C. § 2000e, *et. seq.*;

(b) That Plaintiff be granted judgment against Defendants, as requested, under Counts I, II, and III;

(c) That this Court issue a permanent injunction against Defendants, prohibiting them from engaging in any employment practice or policy which discriminates against others similarly situated to Plaintiff because of their race and/or opposition to discriminatory or unlawful practices, or because of their participation in this lawsuit;

(d) That Plaintiff be reinstated to her position, or in the alternative, that she be awarded front pay;

(e) That Plaintiff recovers from Defendants back pay, benefits, and any other equitable relief that is owed, with prejudgment interest thereon;

(f) That Plaintiff has and recovers compensatory damages in an amount to be determined by a jury;

(g) That Plaintiff has and recovers punitive damages against Defendants in an amount reasonable and commensurate with the harm done and calculated to be sufficient to deter such conduct in the future, as to be determined by a jury;

(h) That Plaintiff has and recovers her costs in this action and reasonable attorneys' fees as provided by law; and

(i) Any and other such further relief that this Court or the Finder of Fact deems equitable and just.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all issues triable by jury.

(Remainder of page left intentionally blank. Signatures on the following page.)

Respectfully submitted this 8th day of July, 2014.

THRASHER LISS & SMITH, LLC

/s/ Kimberly A. Worth

Kimberly A. Worth
Georgia State Bar No. 500790
kworth@tllaw.com

D. Barton Black
Georgia State Bar No. 119977
bblack@tllaw.com

Katy Aultman
Georgia State Bar No. 359702
kaultman@tllaw.com

Attorneys for Plaintiff

Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328
Telephone: (404) 760-6000
Facsimile: (404) 760-0225

CERTIFICATE OF COMPLIANCE

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as required by the Court in Local Rule 5.1 (B).

Respectfully submitted this 8th day of July, 2014.

THRASHER LISS & SMITH, LLC

By: */s/ Kimberly A. Worth*
Kimberly A. Worth
Georgia State Bar No. 500790
kworth@tllaw.com
D. Barton Black
Georgia State Bar No. 119977
bblack@tllaw.com
Katy Aultman
Georgia State Bar No. 359702
kaultman@tllaw.com

Attorneys for Plaintiff

Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328
Telephone: (404) 760-6000
Facsimile: (404) 760-0225

EXHIBIT A

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Qiana Keith
1946 Garden Drive
Gainesville, GA 30507

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. 410-2014-04299
EEOC Representative Robyn Conley, Investigator
Telephone No. (404) 562-6856

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA must be filed in a federal or state court 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.)

- More than 180 days have passed since the filing of this charge.
Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.
The EEOC is terminating its processing of this charge.
The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.
The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought 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.

If you file suit, based on this charge, please send a copy of your court complaint to this office

On behalf of the Commission

Bernice Williams-Kimbrough, District Director

JUL 07 2014

(Date Mailed)

Enclosures(s)

cc: John Padgett
Chairman
GEORGIA REPUBLICAN PARTY, INC.
3110 Maple Drive
Suite 150
Atlanta, GA 30305

Kimberly A. Worth, Esq.
THRASHER LISS & SMITH, LLC
Five Concourse Pkwy
Suite 2600
Atlanta, GA 30328

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10** -- not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

JS44 (Rev. 1/13 NDGA)

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)

Qiana Keith

DEFENDANT(S)

Georgia Republican Party;
Georgia Republican Party, Inc.;
and John Padgett, in his capacity as Chairman of the Georgia Republican Party and Georgia Republican Party, Inc.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Hall

(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)

Kimberly A. Worth
THRASHER LISS & SMITH, LLC
5 Concourse Pkwy, Ste 2600, Atlanta, GA 30328
T: 404-760-8000
E: kworth@tslaw.com

D. Barton Black
THRASHER LISS & SMITH, LLC
5 Concourse Pkwy, Ste 2600, Atlanta, GA 30328
T: 404-760-8000
E: bblack@tslaw.com

Katy Autman
THRASHER LISS & SMITH, LLC
5 Concourse Pkwy, Ste 2600, Atlanta, GA 30328
T: 404-760-8000
E: kautman@tslaw.com

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
- 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT

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)

Civil Rights Act of 1866, 42 U.S.C. § 1981, and Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, 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

- 441 VOTING
- 442 EMPLOYMENT
- 443 HOUSING/ ACCOMMODATIONS
- 444 WELFARE
- 440 OTHER CIVIL RIGHTS
- 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

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- 830 PATENT

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
- 400 STATE REAPPORTIONMENT
- 430 BANKS AND BANKING
- 450 COMMERCE/ICC RATES/ETC.
- 460 DEPORTATION
- 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- 480 CONSUMER CREDIT
- 490 CABLE/SATELLITE TV
- 891 AGRICULTURAL ACTS
- 893 ENVIRONMENTAL MATTERS
- 895 FREEDOM OF INFORMATION ACT
- 950 CONSTITUTIONALITY OF STATE STATUTES
- 890 OTHER STATUTORY ACTIONS
- 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTITRUST
- 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.

Kimberly A. Worth 7/8/2014
 SIGNATURE OF ATTORNEY OF RECORD DATE