



IN THE DISTRICT COURT FOR TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

FEB 25 2013

TAMMY HANLEY, an individual,)
)
)
)
vs.)
)
)
)
STANLEY GLANZ, SHERIFF OF)
TULSA COUNTY, his official capacity;)
and BOARD OF COUNTY)
COMMISSIONERS OF TULSA COUNTY)
a domestic not for profit corporation,)
)
)
)
Defendants.)

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

Case No.
CJ-2013-00985

E. MARK BARCUS

ATTORNEY LIEN CLAIMED
JURY TRIAL DEMANDED

PETITION

COMES NOW the Plaintiff, Tammy Hanley, by and through her attorney of record, Victor R. Wandres, of *Paramount Law*, and brings this action against Stanley Glanz, Sheriff of Tulsa County in his official capacity, and the Board of Commissioners of Tulsa County, a domestic not-for-profit corporation, for violations of her constitutionally protected rights arising out of her employment and termination by said Defendants. In support of her Petition, Plaintiff submits the following:

PARTIES, JURISDICTION AND VENUE

1. This is an action for damages and to secure protection and redress deprivation of rights secured by Oklahoma's anti-discrimination statute, 25 O.S. § 1101, *et seq.*
2. Plaintiff, a resident of the State of Oklahoma, filed a charge of discrimination against Defendant with the Equal Employment Opportunity Commission ("EEOC") complaining of discrimination based on her race. A Notice of Right to Sue was received by Plaintiff on or about November 28, 2012, and this Petition

has been filed with ninety (90) days of the receipt of the Notice of Right to Sue.
As such, all conditions precedent to the filing of this lawsuit have been fulfilled.

3. Compensatory damages are sought pursuant to 25 O.S. §1350.
4. Punitive damages are sought pursuant 25 O.S. §§1101, 1301 *et seq.*
5. Costs and Attorney's fees may be awarded pursuant to 25 O.S. §1350.
6. Plaintiff is a resident of Tulsa County, State of Oklahoma.
7. This action properly lies in the District Court of Tulsa County, as the unlawful employment practices complained of herein occurred within Tulsa County, State of Oklahoma and the Defendant conducts regular business in Tulsa County.

FACTS COMMON TO ALL CLAIMS

8. Plaintiff, Tammy Hanley, incorporates as if realleged Paragraphs 1-7.
9. Plaintiff began her employment with Defendant on or around May 1, 2007.
Plaintiff was employed as a Detention Officer at the Tulsa County Jail.
10. During her employment, Plaintiff was treated less favorable than her similarly situated Caucasian co-workers with regard to training, discipline and termination.
11. Plaintiff observed that Caucasian employees with less seniority were often given job placements and positions over African American employees with greater seniority.
12. Plaintiff's Caucasian co-workers had sex with inmates and committed other policy violations without discipline or recourse, while African American officers were disciplined for less severe actions.

13. In the latter part of her employment, Plaintiff was assigned as the Detention Officer in the Medical Unit. She received no additional training regarding the policies, procedures, and practices of the medical unit.
14. Plaintiff was supervised by all Caucasian officers while in the medical unit.
15. Plaintiff was sent to work in the medical unit as a result of a staffing shortage, and during her time there observed that there continued to be inadequate staffing to properly care for and control the inmates within the medical unit.
16. On or around October 22, 2011, while Plaintiff was working in the medical unit, a medical emergency was called in on a new inmate, an African American male.
17. At the time Plaintiff arrived at the scene of the emergency, Plaintiff told her Caucasian superiors that the inmate needed further medical attention and should be taken to the hospital. Plaintiff's Caucasian supervisors refused to seek further medical attention for the inmate.
18. Plaintiff was off work from October 23, 2011 – October 26, 2011. Upon her return to work on the 26th, Plaintiff observed that the inmate remained in the same cell, still naked, covered by the same suicide blanket.
19. Over the course of two days, October 26th and 27th, 2011, Plaintiff observed that the inmate did not eat any of the food placed in his cell and continued to scream for help.
20. Plaintiff repeatedly asked her Caucasian supervisors to get the inmate further medical attention or to call his family, but all of her requests were denied and she was instructed not to call his family.

21. On October 27, 2011, the inmate died while in custody of the Tulsa County Sheriffs Office, in the same cell, still naked, and under the same blanket.
22. Plaintiff was terminated from her employment with Defendant on April 23, 2012 for allegedly falsifying log-books regarding Mr. Williams, which she did not.
23. Numerous Caucasian detention officers violated TCSO policies but were not disciplined or were disciplined less severely than Plaintiff, despite their egregious treatment of this inmate.

FIRST CLAIM FOR RELIEF

(DISCRIMINATION BASED ON RACE 25 O.S. §§1101, 1301 *et seq.*)

24. Plaintiff, Tammy Hanley, incorporates as if realleged Paragraphs 1-24.
25. By treating Plaintiff differently than her Caucasian co-workers, Defendant discriminated against her in violation of 25 O.S. §§ 1101, 1301 *et seq.*
26. The discrimination committed by Defendants is contrary to Oklahoma's anti-discrimination statute. Plaintiff is suited to recover damages for emotional distress and punitive damages based upon the wanton and willful conduct of Defendants.

WHEREFORE, Plaintiff prays for judgment against Defendants for:

- a. Back pay and lost benefits; front pay;
- b. Compensatory damages for her mental anguish, pain and suffering and other non-pecuniary losses;
- c. Punitive damages for the intentional and knowing acts of discrimination committed by the Defendants' management and executives;
- d. Such other relief as the Court deems just and equitable.

SECOND CLAIM FOR RELIEF:
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

27. Plaintiff, Tammy Hanley, incorporates as if realleged Paragraphs 1-27.

28. The Defendants' actions of intentional and malicious discrimination are extreme and outrageous and have caused severe emotional and psychological damage to the Plaintiff.

WHEREFORE, Plaintiff prays for judgment against the Defendants for:

- a. Back pay and lost benefits; front pay until normal retirement
- b. Compensatory damages for her mental anguish, pain and suffering and other non-pecuniary losses;
- c. Punitive damages for the intentional and knowing acts of discrimination committed by Defendants' management and executives;
- d. Her attorney fees and the costs and expenses of this action;
- e. Such other relief as the Court deems just and equitable.

WHEREFORE, based on the foregoing, Plaintiff prays that this Court grant her the relief sought including, but not limited to, actual damages in excess of Seventy-Five Thousand Dollars (\$75,000), with interest accruing from date of filing of suit, punitive damages in excess of Seventy-Five Thousand Dollars (\$75,000), back pay and lost benefits, compensatory damages for mental anguish, pain and suffering and other non-pecuniary loss, reasonable attorneys fees, injunctive relief, and all other relief deemed appropriate by this Court.

Respectfully submitted,



Victor R. Wandres
Paramount Law
Wright Building
115 West Third Street, Suite 411
Tulsa, Oklahoma 74103
Attorney for Plaintiff