

16. Personal jurisdiction is proper over the Defendants pursuant to Ohio Rev. Code § 2307.382(A)(1).
17. Venue is proper pursuant to Civ.R. 3(B)(3).
18. This Court is a court of general jurisdiction over the claims presented herein, including all subject matters of this Complaint.

FACTUAL ALLEGATIONS

19. Plaintiffs incorporate by reference the allegations from the preceding paragraphs as if fully realleged herein.
20. The City employed Studenic as a Senior Policy Analyst for the Cleveland Community Police Commission (“CPC”) from November 6, 2017 until June 17, 2018.
21. The City employed Thompson as a Community Engagement Coordinator for the CPC from June 12, 2017 until June 25, 2018.
22. The City employed Jovic as an Assistant Administrator for the CPC from August 21, 2017 until May 8, 2018.
23. The CPC is an entity created by a Consent Decree between the City of Cleveland and the U.S. Department of Justice to ensure community engagement in police reforms.
24. The CPC is made up of 13 individuals who live and/or work in Cleveland: 10 appointed by the Mayor and three selected by corresponding police associations.
25. The mission of the Community Police Commission is to make recommendations on policies and practices related to community and problem-oriented policing, bias-free policing, and police transparency; to work with the many communities that make up Cleveland for the purpose of developing recommendations for police practices that reflect an understanding of

the values and priorities of Cleveland residents; and to report to the City and community as a whole and to provide transparency on police department reforms.

26. Since its inception, the CPC has been mired in scandal, particularly surrounding the position of Executive Director of the CPC.
27. Nicole Junior, who was originally hired to become the CPC's first Executive Director, withdrew her position after it was discovered that she falsified moving receipts in an effort to defraud the City.
28. Junior pleaded guilty to felony telecommunications fraud.
29. Goodrick was hired to replace Junior as Executive Director of the CPC on June 13, 2017.
30. Goodrick was Studenic's supervisor.
31. Goodrick was Thompson's supervisor.
32. Goodrick was Jovic's supervisor.
33. Studenic is female.
34. Thompson is female.
35. Jovic is female.
36. Goodrick is male.
37. Goodrick frequently made sex-based comments to Studenic.
38. Goodrick told Studenic that she looked like his ex-fiancée.
39. Goodrick told Studenic that he prefers dating women that are taller than him.
40. Studenic is taller than Goodrick.
41. On more than one occasion Goodrick told Studenic that he didn't like taking her to meetings because she was distracting due to her physical attractiveness.
42. On more than one occasion Goodrick told Studenic to use her looks to get what she wants.

43. Goodrick habitually leered at Studenic during meetings, to the point that it made her and other attendees uncomfortable.
44. On more than one occasion, Jovic, a fellow meeting attendee, told Studenic that Goodrick had been leering at Studenic during the meeting, and that it made her uncomfortable.
45. On more than one occasion, Thompson, a fellow meeting attendee, told Studenic that Goodrick had been leering at Studenic during the meeting, and that it made her uncomfortable.
46. Goodrick regularly came into Studenic's office, offering Studenic inappropriate details about his own sex life.
47. Goodrick told Studenic that he and his ex-fiancée had different sex drives which caused problems in their relationship.
48. Goodrick told Studenic that he met women on Tinder and regularly had sex with them.
49. Goodrick texted Studenic to tell her that he had sex with his ex-fiancée.
50. The comments regarding Goodrick's sex life were unwelcome.
51. Studenic felt pressured to let Goodrick stay in her office and continue the inappropriate behavior, as he was in a position of power over her.
52. Jovic suffers from anxiety and depression.
53. Jovic's anxiety and depression substantially limits one or more major life activities, including working.
54. Jovic's anxiety and depression substantially limits her thinking, which is a major life activity.
55. Alternatively, Defendants regarded Jovic as disabled.
56. Notwithstanding any disability, actual or perceived, Jovic remained, at all times material herein, fully qualified for the position of Assistant Administrator at the CPC.

57. Jovic informed Goodrick that she suffered from anxiety and depression and advised him of a change in her medication in October 2017.
58. Goodrick commented that Jovic needed to go to another doctor and that she should not be on medication because he was not.
59. Jovic knew that Goodrick had also been diagnosed with depression because he had previously told her “my longest relationships have been with alcohol and depression.”
60. After the October 2017 medication conversation, Goodrick disclosed Jovic’s disability to her coworkers.
61. Goodrick frequently made disparaging remarks about Jovic’s disability to her co-workers, telling them that Jovic was “crazy”, and that she could not do her job because she was “too crazy.”
62. Goodrick also regarded Jovic as an alcoholic and told her that in front of her co-workers.
63. Prior to a November 30, 2017 charity dinner, Goodrick told Jovic’s co-workers to not let her drink at the dinner because of her alcoholism.
64. Jovic found the statements regarding her anxiety, depression, and perceived alcoholism demeaning and humiliating.
65. On or about December 6, 2017, as Studenic was entering the building, a group of men in the parking lot began aggressively catcalling her, using lewd language.
66. Studenic reported the December 6, 2017 incident to Goodrick the same day and suggested that the female employees should not leave the building alone at night.
67. Thompson experienced severe and pervasive sexual harassment from random men in the building.

68. Almost daily, men grouped outside the door or in the parking lot approached Thompson to tell her that she looked good, smelled good, that she should smile, and that they want to “get to know her.”
69. Thompson had been followed to and from her car from random men in the parking lot, to the point where she often feared for her safety.
70. Thompson complained to Goodrick about the sexual harassment occurring in the building on or about December 6, 2017.
71. Jovic experienced severe and pervasive sexual harassment from random men in the building.
72. Jovic had been followed to and from her car on multiple occasions, to the point where she often feared for her safety.
73. Jovic complained to Goodrick about the sexual harassment occurring in the building on or about December 6, 2017.
74. Goodrick did not report the sexual harassment up the chain of command.
75. Goodrick informed Studenic that “catcalling is a compliment.”
76. Goodrick hosted several happy hours after work, during which he pressured Studenic into drinking and attempted to be alone with her.
77. In mid-December 2017, during one of the happy hours, Studenic tried to leave repeatedly, but each time Goodrick insisted that she stay, and he proceeded to buy Studenic more drinks.
78. During the December 2017 happy hour, Studenic spent the entire evening attempting to get away from Goodrick, only to have him follow her.
79. At the end of the December 2017 happy hour, while Studenic was waiting for her Lyft, Goodrick placed his hand on Studenic’s knee and told her that he hoped her Lyft got lost.

80. At the end of the December 2017 happy hour, Goodrick followed Studenic outside and said he needed a ride.
81. Studenic replied to Goodrick's request for a ride by stating she would only share a Lyft with him if he sat in the front.
82. Goodrick declined to share a Lyft with Studenic because he did not want to sit in front.
83. Following the mid-December incident, Studenic refused to attend any additional happy hours with Goodrick.
84. On or about January 24, 2018, Studenic was a passenger in Goodrick's vehicle for a work-related function.
85. During the January 24, 2018 trip, Goodrick displayed his girlfriend's vaginal swab test results in his vehicle so that Studenic would see them.
86. Immediately prior to the January 24, 2018 trip, Goodrick cleaned out his car to make room for Studenic.
87. Immediately prior to the January 24, 2018 trip, Goodrick removed numerous papers from his vehicle, but left the vaginal swab test results in the open glove compartment in front of Studenic's seat.
88. On or about January 26, 2018, as Studenic was entering the elevator, two men got on and began talking about how attractive she was.
89. During this incident, one of the men from the elevator followed Studenic and began asking her where she was going and where she worked.
90. Studenic reported the January 26, 2018 incident to Goodrick, and he told her "nobody cares" and that it was her fault that she was sexually harassed.

91. On or about March 5, 2018, Plaintiffs sent a letter to the Commissioners complaining about Goodrick.
92. In the March 5, 2018 letter, Plaintiffs reiterated the sexual harassment complaints that they had previously made to Goodrick on December 6, 2017 and January 26, 2018.
93. Soon after the March 5, 2018 letter, Goodrick was informed that Plaintiffs complained about him.
94. On or about March 20, 2018, after Goodrick learned of Studenic's complaints, he cornered her in her office and yelled at her about a news article that he was trying to explain.
95. After the March 20, 2018 incident, Studenic became afraid that Goodrick would become physically violent towards her.
96. After the March 20, 2018 incident, Studenic was afraid to be around Goodrick.
97. On or about March 20, 2018, Goodrick pounded on Thompson's wall, entered and yelled at Thompson, accusing of her going to another community engagement coordinator's presentation to intimidate her.
98. Thompson found Goodrick's March 20, 2018 accusation to be offensive.
99. On or about March 20, 2018, Goodrick slammed his hands down on Jovic's desk, leaned towards her, and talked to Jovic with a raised voice about scheduling.
100. After the March 20, 2018 incidents, Plaintiffs were afraid to be around Goodrick.
101. After March 21, 2018, Goodrick stopped speaking to Studenic.
102. On March 21, 2018, Goodrick informed Studenic that she was no longer invited to attend the Stakeholders' meetings.

103. After March 21, 2018, Goodrick informed Studenic that she was not to communicate directly with the Commissioners regarding agenda items but, rather, that communications with the Commissioners needed to go through him.
104. Goodrick cut off Studenic's communications with the Commissioners in an attempt to prevent Studenic from making additional complaints.
105. After March 21, 2018, Goodrick stopped updating Studenic on what happened at Commissioners' meetings.
106. After March 21, 2018, Goodrick stopped speaking to Thompson.
107. After March 21, 2018, Goodrick cut off Thompson's communication with commissioners who specifically asked for help in the creation of projects, initiatives, and events on behalf of the commission, telling her that she had to email him for permission each time she wanted to email a commissioner.
108. After March 21, 2018, Goodrick cut off Thompson's contact with Community Development Corporations ("CDC") and each time Thompson asked to schedule a meeting with the CDC, Goodrick would instead schedule a meeting for himself with them.
109. After March 21, 2018, Goodrick cut off Thompson's communication with new Cleveland City Council members that had yet to engage with the CPC or the Consent Decree.
110. After March 21, 2018, Goodrick stopped speaking to Jovic.
111. After Jovic's complaint, Goodrick slammed the door in Jovic's face when she attempted to speak with him.
112. After March 21, 2018, Plaintiffs could hear Goodrick throwing objects in his office and slamming doors.

113. On or about March 23, 2018, Goodrick directed Studenic and Thompson to take their complaints to “someone else.”
114. On or about March 26, 2018, Studenic filed an EEO complaint against Goodrick, accusing him of sexual harassment and retaliation.
115. On or about March 26, 2018, Thompson filed an EEO complaint against Goodrick, accusing him of race discrimination and retaliation, and complaining of sexual harassment.
116. On or about March 26, 2018, Jovic filed an EEO complaint against Goodrick, accusing him of disability discrimination and retaliation, and complaining of sexual harassment.
117. On or about April 6, 2018, Goodrick was placed on a four-week leave, pending investigation.
118. After Goodrick was placed on leave the Commissioners told Studenic that she was no longer needed at Monitoring Team Meetings.
119. On or about April 9, 2018, Director of Finance, Sharon Dumas, met with Plaintiffs.
120. During the April 9, 2018 meeting, Dumas told Plaintiffs that they were being investigated.
121. During the April 9, 2018 meeting, Dumas threatened Plaintiffs by stating “don’t give me a reason to come after you.”
122. The investigator hired by the City, Diane Citrino, warned Studenic against reporting anything further to her, telling Studenic that anything she said would likely become public and Studenic would be in the news.
123. On or about May 3, 2018 Citrino interviewed Thompson as part of the investigation.
124. Thompson informed Citrino that she witnessed Goodrick sexually harassing Studenic and detailed that harassment.

125. Thompson informed Citrino that she witnessed Goodrick treating Jovic differently because of Jovic's disability.
126. On or about May 1, 2018 Citrino interviewed Jovic as part of the investigation.
127. Citrino, warned Jovic that anything she said would likely become shared with the media.
128. Jovic understood Citrino's warning as an attempt to dissuade Jovic from disclosing additional information about Goodrick.
129. On or about May 1, 2018, Commissioner Rev. Dr. V. Yvonne Conner relayed the City's position to Plaintiffs that Goodrick did not do anything serious.
130. On or about May 4, 2018, Plaintiffs were informed that Goodrick was returning on the following Monday, prior to the conclusion of the investigation.
131. The news of Goodrick's imminent return caused Jovic to suffer from an anxiety attack.
132. Because Jovic could not face further harassment based on her anxiety and depression, and because she feared for her safety around Goodrick, Jovic was unable to return to work on Monday, May 7, 2018.
133. Jovic was forced to resign her employment on May 8, 2018.
134. On or about Monday, May 7, 2018, the City brought Goodrick back from leave, prior to the conclusion of the investigation.
135. On or about May 7, 2018, when Goodrick returned, Studenic and Thompson went to Human Resources requesting a separate workspace during the pendency of the investigation.
136. The City denied Studenic and Thompson's requests for a separate workspace.
137. On or about May 7, 2018, Studenic took a sick day after her request for a separate workspace was denied.

138. The City labeled Studenic Absent Without Leave for her May 7, 2018 sick day and docked her pay.
139. On or about May 7, 2018, Thompson took a sick day after her request for a separate workspace was denied.
140. The City labeled Thompson Absent Without Leave for her May 7, 2018 sick day and docked her pay.
141. On May 7, 2018, Studenic called her psychiatrist and requested the first available appointment.
142. Studenic took the week of May 7, 2018 off work, during which she experienced a severe depressive episode caused by Goodrick's return.
143. During Studenic's depressive episode, she was unable to sleep normally, eat normally, work out, or study.
144. During Studenic's depressive episode the week of May 7, 2018, Studenic suffered from crying spells and stopped seeing friends.
145. Studenic returned to work on May 14, 2018.
146. After Studenic returned to work on May 14, 2018, the City required Studenic to continue working with Goodrick, even though her complaints about him sexually harassing her were still being investigated.
147. The City caused Studenic to develop anxiety and depression by requiring her to work with Goodrick during the pendency of the investigation.
148. After Studenic returned to work on May 14, 2018, she continued to be afraid that Goodrick would become physically violent towards her.

149. On May 14, 2018, Goodrick encountered Studenic in the hallway and looked her up and down and stared at her in an attempt to intimidate her.
150. Studenic felt threatened and intimidated by Goodrick.
151. Studenic avoided walking in the hallways after the May 14, 2018 incident, in an attempt to avoid seeing Goodrick, which prevented her from using the restroom as needed.
152. On May 14, 2018, Studenic reported the hallway incident to Anthony Houston, a City employee.
153. When Studenic reported the incident to Houston, Studenic began shaking and crying.
154. On May 14, 2018, Studenic attempted to distance herself from Goodrick by working from the conference room.
155. On May 14, 2018, Houston told Studenic that she was not able to work from the conference room.
156. Studenic suffered a panic attack on May 14, 2018 when she was told that she was not able to work from the conference room.
157. Houston made Studenic return to her office, even though she was visibly distressed.
158. On May 14, 2018, Goodrick attempted to meet one-on-one with Studenic in person.
159. On May 14, 2018, Studenic informed the City that she was not comfortable meeting with him one-on-one in person.
160. On May 14, 2018, Commissioner Connor met with Studenic and informed Studenic that she was required to meet with Goodrick one-on-one in person.
161. When Commissioner Connor informed Studenic that she was required to meet with Goodrick in person, Studenic began shaking and crying.

162. On several occasions after May 14, 2018, Goodrick attempted to sit in on meetings with Studenic, even though his presence was not requested.
163. On several occasions after May 14, 2018, Goodrick attempted to sit in on meetings with Thompson, even though his presence was not requested.
164. Studenic met with her therapist on June 2, 2018.
165. Studenic met with her psychiatrist on June 7, 2018.
166. On June 7, 2018 Studenic's psychiatrist prescribed, Xanax, an anxiety medication.
167. Studenic was not previously prescribed Xanax.
168. On June 7, 2018 Studenic's psychiatrist prescribed trazodone, a medication to help her sleep.
169. Studenic was not previously prescribed trazodone.
170. On June 7, 2018 Studenic's psychiatrist expressed concern that Studenic may not recover from the trauma caused by the City requiring Studenic to work with Goodrick.
171. Since May 7, 2018, Studenic's health has declined.
172. Since May 7, 2018, Studenic cries often.
173. Since May 7, 2018, Studenic is unable to eat normally and has lost weight.
174. Since May 7, 2018, Studenic experiences panic attacks.
175. Since May 7, 2018, Studenic has developed a tremor in her hand.
176. On or about June 17, 2018 Studenic and Thompson were informed that they would be required to meet with Goodrick in person the following week.
177. Because Studenic was physically and mentally unable to continue working with Goodrick, she was forced to resign on June 17, 2018.

178. Because Thompson continued to fear for her safety around Goodrick, she was forced to resign on June 25, 2018.

FIRST CAUSE OF ACTION
(Hostile Work Environment)
(Brought by Studenic Against the City)

179. Studenic incorporates by reference the allegations from the preceding paragraphs, as if fully realleged herein.

180. As a female, Studenic is a member of a protected class for the purposes of Ohio Rev. Code § 4112.02.

181. Goodrick subjected Studenic to sexual harassment in the form of unwelcome sexual comments, unwelcome advances, and unwanted physical contact.

182. The City created and sustained an environment of severe and pervasive sexual harassment in the form of unwelcome sexual comments, unwelcome advances, and unwanted physical contact in violation of Ohio Rev. Code § 4112.02.

183. As a direct and proximate result of the City's unlawful conduct, Studenic suffered and will continue to suffer damages.

SECOND CAUSE OF ACTION
(Hostile Work Environment)
(Brought by All Plaintiffs Against the City)

184. Plaintiffs incorporate by reference the allegations from the preceding paragraphs, as if fully realleged herein.

185. As females, Plaintiffs are members of a protected class for the purposes Ohio Rev. Code § 4112.02.

186. Non-employees subjected Plaintiffs to sexual harassment in the form of unwelcome sexual comments and unwelcome advances.

187. The City was aware of the sexual harassment that Plaintiffs experienced and failed to take remedial action.

188. The City created and sustained an environment of severe and pervasive sexual harassment in the form of unwelcome sexual comments, and unwelcome advances in violation of Ohio Rev. Code § 4112.02.

189. As a direct and proximate result of the City's unlawful conduct, Plaintiffs suffered and will continue to suffer damages.

THIRD CAUSE OF ACTION
(Disability Discrimination)
(Brought by Jovic Against the City)

190. Jovic incorporates by reference the allegations from the preceding paragraphs, as if fully realleged herein.

191. Throughout her employment, Jovic was fully competent to perform the duties of her position at the City.

192. Jovic, at all times material herein, was disabled.

193. In the alternative, the City regarded Jovic as disabled.

194. The City treated Jovic differently because of Jovic's disability and/or because the City regarded Jovic as disabled.

195. The City's treatment of Jovic, because of Jovic's disability and/or perception of Jovic as disabled, was in contravention of Ohio Rev. Code § 4112.02

196. As a result of the City's unlawful conduct, Jovic has suffered, and will continue to suffer, pecuniary damages and emotional harm.

FOURTH CAUSE OF ACTION
(Retaliation)
(Brought by All Plaintiffs Against the City)

197. Plaintiffs incorporate by reference the allegations from the preceding paragraphs, as if fully realleged herein.
198. Plaintiffs' complaints of sexual harassment, disability discrimination, and race discrimination were protected activity under Ohio Rev. Code § 4112.02
199. The City categorized Studenic and Thompsons as AWOL and docked their pay in retaliation for Studenic's and Thompson's engagement in activity protected by Ohio Rev. Code § 4112.02
200. The City investigated Plaintiffs in retaliation for Plaintiffs' engagement in activity protected by Ohio Rev. Code § 4112.02
201. The City revoked Studenic's invitation to attend stakeholders' meetings in retaliation for Studenic's engagement in activity protected by Ohio Rev. Code § 4112.02
202. The City revoked Studenic's invitation to attend Monitoring Team meetings in retaliation for Studenic's engagement in activity protected by Ohio Rev. Code § 4112.02
203. The City prevented Studenic from communicating with Commissioners directly in retaliation for Studenic's engagement in activity protected by Ohio Rev. Code § 4112.02
204. The City required Studenic to work with Goodrick, even though her allegations of sexual harassment against him were still being investigated, in retaliation for Studenic's engagement in activity protected by Ohio Rev. Code § 4112.02
205. The City cut off Thompson's communication with commissioners who specifically asked for help in the creation of projects, initiatives, and events on behalf of the commission, telling her that she had to email Goodrick for permission each time she wanted to email a

commissioner, in retaliation for Thompson's engagement in activity protected by Ohio Rev. Code § 4112.02

206. The City cut off Thompson's contact with CDCs in retaliation for Thompson's engagement in activity protected by Ohio Rev. Code § 4112.02.

207. The City cut off Thompson's communication with new Cleveland City Council members that had yet to engage with the Cleveland Community Police Commission or the Consent Decree, in retaliation for Thompson's engagement in activity protected by Ohio Rev. Code § 4112.02.

208. The City made Plaintiffs' work environment so intolerable that Plaintiffs had no alternative but to resign.

209. The City constructively discharged Plaintiffs in retaliation for Plaintiffs' engagement in activity protected by Ohio Rev. Code § 4112.02

210. The City's constructive discharge of Plaintiffs was in contravention of Ohio Rev. Code. § 4112.02(I).

211. As a result of The City's unlawful conduct, Plaintiffs have suffered, and will continue to suffer, pecuniary damages and emotional harm.

FIFTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)
(Brought by Studenic and Jovic Against the City)

212. Studenic and Jovic incorporate by reference the allegations from the preceding paragraphs, as if fully realleged herein.

213. The City intended to cause Studenic and Jovic emotional distress or knew that their actions would result in serious emotional distress to Studenic and Jovic.

214. The City's conduct was so extreme and outrageous as to go beyond all possible bounds of decency and was such that it can be considered as utterly intolerable in a civilized community.
215. Studenic's anxiety and depression was exacerbated by the City's actions.
216. Studenic began having panic attacks and developed a tremor in her hand.
217. Jovic's anxiety was exacerbated by the City's actions.
218. Jovic began experiencing anxiety attacks.
219. The City's actions were the proximate cause of Studenic and Jovic's psychic injuries.
220. As a result of the City's acts and omissions as set forth above, Studenic and Jovic have suffered mental anguish of such a serious nature that no reasonable person could be expected to endure it.
221. As a result of the City's conduct and the resulting emotional distress, Studenic and Jovic have suffered, and will continue to suffer, pecuniary damages and emotional harm.

SIXTH CAUSE OF ACTION
(Aiding and Abetting in Violation of Ohio Rev. Code § 4112.02(J))
(Brought by All Plaintiffs Against Goodrick)

222. Plaintiffs incorporate by reference the allegations from the preceding paragraphs as if fully re-alleged herein.
223. Pursuant to Ohio Rev. Code § 4112.02(J), it is unlawful for any person to aid or abet unlawful discrimination.
224. Plaintiffs were in a protected class because of their gender, pursuant to Ohio Rev. Code § 4112.
225. Jovic was in a protected class because of her disability, pursuant to Ohio Rev. Code § 4112.

226. In making complaints about disability discrimination and sexual harassment, Plaintiffs engaged in activity protected by Ohio Rev. Code § 4112.
227. In revoking Studenic's invitation to attend stakeholders' meetings, Goodrick aided and abetted the City in unlawful discrimination based on gender.
228. In preventing Studenic from communicating with Commissioners directly, Goodrick aided and abetted the City in unlawful discrimination based on gender.
229. In cutting off Thompson's communication with commissioners, Goodrick aided and abetted the City in unlawful discrimination based on gender.
230. In cutting off Thompson's contact with CDCs, Goodrick aided and abetted the City in unlawful discrimination based on gender.
231. In cutting off Thompson's communication with new Cleveland City Council members, Goodrick aided and abetted the City in unlawful discrimination based on gender.
232. In treating Jovic differently than similarly-situated employees, Goodrick aided and abetted the City in unlawful discrimination based on disability.
233. Goodrick made Plaintiffs' work environment so intolerable that Plaintiffs had no alternative but to resign.
234. As a direct and proximate result of the unlawful conduct of Goodrick, Plaintiffs suffered and will continue to suffer damages.

CONCLUSION

Plaintiffs Bethany Studenic, Chinenye Thompson, and Rosemary Jovic seek judgment against each Defendant in an amount in excess of \$25,000 to fully, fairly, and justly compensate them for injury, damage, and loss, and respectfully pray that this Court enter judgment in their favor and award them past and future economic and non-economic compensatory damages,