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U.S. DISTRICT COURT
N.D. OF ALABAMA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

BRITTANY REYNOLDS,	)	
	)	
PLAINTIFF,	)	**CIVIL ACTION NO.:**
v.	)	
	)	**JURY DEMAND**
THE WATER WORKS BOARD OF THE CITY OF BIRMINGHAM D/B/A BIRMINGHAM WATER WORKS AND CENTRAL ALABAMA WATER, AND TIM HARRIS, IN HIS OFFICIAL AND INDIVIDUAL CAPACITY	)	
	)	
DEFENDANTS.	)	

COMPLAINT

I. JURISDICTION

1. This is a suit authorized and instituted pursuant to Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, *et seq*., as amended, sex discrimination under Title VII of the Civil Rights Act of 1964, as amended, race discrimination under Title VII of the Civil Rights Act of 1964 as amended and 42 U.S.C. §1981, and state law claims. The jurisdiction of this Court is invoked to secure protection for and to redress the deprivation of rights secured by the ADEA, Title VII, and 42 U.S.C. §1981 and 42 U.S.C. §1983.

II. PARTIES

2. Plaintiff, Brittany Reynolds (hereafter "Plaintiff" or "Reynolds") is a female citizen of the United States and is a resident of McCalla, Alabama.

3. Defendant, The Water Works Board of the City of Birmingham d/b/a Birmingham Water Works and Central Alabama Water. (hereafter "Defendant" or "CAW") is a domestic public corporation doing business in the state of Alabama. At all times relevant to this action, Defendant has maintained and operated a business in Alabama.

4. Defendant, Tim Harris ("Harris"), is an individual over the age of nineteen (19) and is a resident of Jefferson County. At all times relevant to this action Harris was acting both individually and in his official capacity as Chief Operating Officer of CAW.

5. CAW was Reynolds "employer" for the purposes of Section 504 of the Rehabilitation Act of 1973, codified as 29 U.S.C. § 794, during all time relevant to this complaint. CAW is a recipient of federal financial assistance, has more than fifty (50) employees, and conducts business in the Northern District of Alabama.

III. ADMINISTRATIVE PROCEDURES

6. Plaintiff brings this action for the unlawful employment practices and acts of intentional discrimination that occurred at the CAW's Birmingham Filter Plant.

7. This action seeks to redress unlawful employment practices resulting from the acts of Defendant, its agents, servants, and employees committed with respect to Plaintiff's employment; and for a permanent injunction restraining Defendant from maintaining a habit and practice of discriminating against the Plaintiff on account of disability, sex/gender, and race.

8. Defendant is engaged in an industry affecting commerce and has fifteen (15) or more employees and are employers within the meaning of 42 U.S.C. § 2000e(b)(g) and (h).

9. On March 11, 2026, within 180 days of the last discriminatory act of which Plaintiff complains, Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission (hereinafter "EEOC") (Exhibit A).

10. On September 9, 2026, Plaintiff's Notice of Right to Sue was issued by the EEOC, and Plaintiff has filed suit within ninety (90) days of issuance of her Notice of Right to Sue (Exhibit B).

11. There are no statutory prerequisites for 42 U.S.C. § 1981, and the claims are filed within 4 years of the alleged actions. 28 U.S.C. § 1658. *See also, Jones v. R.R. Donnelley & Sons Co*., 541 U.S. 369 (U.S. 2004); *Baker v. Birmingham Bd. of Educ.*, 531 F. 3d 1336 (11th Cir. 2008).

12. All administrative prerequisites for filing suit have been satisfied, and Plaintiff is entitled to bring this action.

IV. FACTS

13. Reynolds is an African-American female. She started working for CAW on January 7, 2019.

14. Reynolds was hired as an "IV Helper."

15. Initially with CAW, Reynolds worked under the supervision of Manager, Jonathan Harris (black male), Mac Underwood (CEO) (black male), and Michael Johnson (CEO) (black male). During this time — 2019 to 2021— most of upper management was led by black males.

16. While employed under these black males, Reynolds received the following promotions:

- January 2020 Night Shift Operator
- October 2021 Day Shift Operator of the Western Filter Plant
- August 2025 — lateral transfer — Day Shift Operator of the Shades Mountain Filter Plant.

17. Between 2019 and 2021, Reynolds received positive performance evaluations. In January 2023, Reynolds began working under a white male manager, Tim Harris ("Harris") and from that point forward, her positive performance reviews declined.

18. In the 150-year history of the CAW, Reynolds was first African-American female to become IV Lead Operator. Reynolds was very successful at her

job. In 2024, she received an award of Operator of the Year — Alabama/Mississippi Conference (2023) and she was featured on the cover of Top Operator Magazine in October 2025.

19. Reynolds was well qualified for her job with CAW having over 15 years of experience in water treatment. While working for CAW Reynolds was attending class to obtain her MBA degree.

20. Harris is the manager over all four plants at CAW and the companies Chief Operating Officer ("COO"). During a company trip to Anaheim, California on June 12, 2024, and intoxicated Harris, approached Reynolds in the hotel lobby. In front of several other co-workers in the hotel lobby, Harris asked Reynolds to go with him to his hotel room. Reynolds declined his offer. Harris repeated his requests to Reynolds to go to his room. Harris repeatedly said to Reynolds, "I need help taking 3 collared shirts to my room." Reynolds declined this invitation twice. Harris continued asking and then stated he needed help back to his room because he was drunk.

21. Reynolds eventually agreed to walk with Harris to his room. When Harris opened the door to the room, Reynolds remained outside the room. Harris kept begging Reynolds to step inside the room to "see how nice the room is." Reynolds stepped in quickly to see the room. Reynolds was leaving the bathroom area, when Harris standing behind her said, "I'm trying to get some pussy tonight."

22. Reynolds was immediately offended and afraid and left Harris' hotel room without responding and rushed back to her hotel.

23. In April 2025, CAW held interviews for two superintendent positions. Reynolds applied and interviewed for the position of superintendent. The panel interviewing her had three white males and one black male.

24. Said candidates for the position included:

- Three white men: Stan Brock, Bachelor of Science degree and 16 years of experience; Bruce Johnson, High School Diploma and 30 years of experience; and Casey Johnson, High School Diploma and 19 years of experience.
- Three black men: Jeremy Hawkins, High School Diploma, and 28 years of experience; William Abercrombie, two Bachelor of Science Degrees and 28 years of experience, and Julius Whitehead, High School Diploma and 16 years of experience.
- Plaintiff, Brittany Reynolds; Bachelor of Science Degree, 15 years of experience, and two classes away from obtaining her MBA.

25. CAW promoted two white men for the open positions: Stan Brock and Casey Johnson ("Johnson").

26. Reynolds was not selected.

27. Harris called Reynolds personally to inform her she did not receive the

promotion. Harris made several statements to Reynolds during this phone call including: 1) He did not want to promote Hawkins — a black male with 28 years of employment at CAW; 2) He did not want to promote Abercrombie — a black male with 28 years of employment at CAW; and 3) he wanted both men to retire instead.

28. Unexpectedly, a third promotion was given to a white male named Johnathan Malloy ("Malloy"). Malloy was promoted for a second time in early 2026.

29. During the phone call, Harris told Reynolds that he would promote her to superintendent of the Western Filter Plant in downtown Birmingham. At CAW, the Western Filter Plant is referred to as "the black employee plant."

30. In May 2025, during a Partnership for Safe Drinking Water meeting, Harris called Reynolds aside privately and said to her, "you are so beautiful,"; "you are in the wrong field"; and "should be a model instead of working in water treatment."

31. In the summer of 2025, Harris asked Reynolds to train Joshua Templeton, a white male, on partnership responsibilities. Templeton was the least experienced member of the team. Reynolds told Harris she would not train an employee without first receiving a promotion. She told him that Johnson should train him since he was promoted. Harris responded, "Johnson does not know how to do the job."

32. In June 2025, Templeton called Reynolds and stated that Harris promised him the job of Senior Operator at Shades Mountain on Highway 280. "Shades Mountain" as it is commonly called is known at CAW as "the white employee plant." Templeton added that, if for some reason he did not get the job, that he would refuse to help Reynolds if she applied for it.

33. Harris removed the ability for any lateral movement in the company, preventing Julius Whitehead, moving from Carson Filter Plaint in Pinson, Alabama to Shades Mountain. It was well known throughout CAW, that Whitehead wanted the Shades Mountain job.

34. Templeton was given the Shades Mountain job. Remarkably, the job description was changed to better suit Templeton's lower qualifications.

35. In June 2025, Templeton (white) had four years of experience as an IV Operator. In May 2025, the job description required eight years experience as an IV Operator. In May 2025, Whitehead (black) had 15 years of experience as an IV Operator.

36. The following white men were promoted under Harris' supervision:

- Tommy Ryan — Bachelor of Science Degree
- Stan Brock — Bachelor of Science Degree
- Joshua Templeton — High School Diploma
- Johnathan Malloy — High School Diploma

- Gage McPherson — High School Diploma

37. Templeton told Reynolds, "Your biggest problem as an African-American woman was that I did not know how to keep my mouth shut and stay in my place."

38. In August 2025, Reynolds decided to move laterally to the Shades Mountain Plant. Reynolds wanted to succeed at the Shades Mountain plant even though she would encounter race and gender discrimination.

39. In September 2025, a discussion was held at the Shades Mountain plant concerning reducing costs on fluoride usage. Reynolds asked many questions about the use of fluoride in drinking water. Malloy snapped at Reynolds saying, "If you keep asking questions, you will have to run lab testing every hour." Shortly after his remark he said, "Weak, lazy people won't make it at Shades Mountain" and "I don't want employees coming here just for the 5% premium pay."

40. Reynolds was offended by Malloy's racist and sexist remarks.

41. In October 2025, Malloy called Reynolds into his office. Malloy told Reynolds, "I don't see you as a senior operator; your MBA degree is only for you [Reynolds] not the company, and if you leave the company you will take the degree with you." "So it (MBA degree) holds no value in evaluating you at the end of the year." This was disparaging and belittling to Reynolds as a black woman. Malloy was operating on pay grade letter O, giving him a salary of approximately $179,483.00.

42. In October 2025, Reynolds received a low-performance evaluation from Malloy. In November 2025, Reynolds responded to the evaluation by filing a written complaint. Reynolds complained about inconsistent performance evaluations and different treatment based on race and gender.

43. In or around October 2025 while working at the Western Filter Plant during a filter rehabilitation project, Harris was walking towards Reynolds in the hallway. Reynolds asked Harris, "Where are you going?" To which Harris responded, "To the restroom. Do you want to help me?" Reynolds was offended and embarrassed by this sexual remark.

44. On October 30, 2025, Reynolds had a telephone call with Tim Harris. She told Harris that she felt overlooked because she is a black woman. Harris responded with the following: "You should be satisfied with your current position," "If I (Harris) were your supervisor, you (Reynolds) would not receive a higher evaluation," "I am white and have problems too because there are now more black employees and "men are not ready for a female superintendent." Reynolds was embarrassed and belittled by these racist remarks.

45. On February 5, 2026, at approximately 5:00 p.m., Reynolds received an email with the new employee handbook. Reynolds worked until around 11:00 p.m. that night and had the next seven days off.

46. During this week off, Reynolds received a call on February 9, 2026 to

report for mandatory company-wide drug testing. Reynolds reported to the CAW "distribution building." She waited for 2.5 hours in a holding room with no instructions from CAW personnel about drug testing procedures.

47. Reynolds provided her urine sample. While washing her hands in the bathroom she was told that she failed the drug test. Reynolds told CAW staff that she takes prescription medication. Reynolds was summarily suspended without pay pending confirmatory testing. Reynolds became distraught and began crying. Staff members escorted her down the hallway while co-workers watched her weep.

48. This felt like a "perp walk" to Reynolds because the CAW employees knew that drug tests were being conducted and based on Reynolds reaction they knew she failed the test.

49. Employees that passed were placed in a certain room and employees that failed were placed in a different room. Reynolds was escorted to the room of employees who failed the drug screen.

50. Reynolds told Reliability Officer, Ray Sloan ("Sloan") that she was being targeted because she is black. CAW staff told Reynolds she was on unpaid administrative leave. Reynolds went into a state of emotional shock and told staff she felt like she was going to faint.

51. CAW asked her to surrender her badge and company phone. "Chief Peoples Officer," otherwise known as Human Resources, Brian Lewis ("Lewis")

asked Reynolds why she was so upset. She said that she was clean from drugs and embarrassed that she was being escorted by security to her car.

52. While walking to her car, Reynolds told a fellow employee that, "if you are on a prescription medication you will fail the drug test."

53. On February 21, 2026 and twelve days later, Malloy called Reynolds to tell her that she passed the confirmatory drug test.

54. On February 25, 2026, Reynolds went to pick up her work badge, that allows her to clock in and out for work. On February 27, 2026, Reynolds clocked in for work at approximately 6:53 a.m. for her 7:00 a.m. shift at the Shades Mountain Filter Plant.

55. Before Reynolds could begin work for the day, she was called into a meeting. Present were members of management, Human Resources, and security. Reynolds was told she was being terminated for "hysterical behavior disrupting operations," referring to her response to her failed drug screen on February 9, 2026.

56. Reynolds was escorted off company property by security.

57. Reynolds again felt offended and humiliated.

58. Reynolds was terminated after seven years of service. At the time she was fired, she had no disciplinary records, perfect attendance and major professional recognition in the industry across the nation.

59. CAW's board members are:

- Tommy Hudson – Chairman
- Phillip Wiedmeyer – Vice-Chairman
- Jeff Brumlow – Director
- Bill Morris – Director
- Jarvis Patton – Director
- David Standridge – Director

V. STATEMENT OF PLAINTIFF'S CLAIMS

COUNT ONE
PLAINTIFF'S TITLE VII RACE & 42 U.S.C. §1981 CLAIMS - TERMINATION

60. Reynolds worked under the supervision of Harris (white male).

61. Reynolds was suspended without pay for failing a drug screen due to taking prescription medication.

62. Reynolds was allowed to return to work after secondary drug testing confirmed she was not using illegal drugs.

63. Reynolds was fired four days later for "hysterical behavior disrupting operations."

64. CAW was motivated to terminate Porter's employment because of her race, even though other factors, known or unknown to her, may have also motivated it to act as it did. 42 U.S.C. §2000e-2(m).

65. Reynolds has experienced lost wages and other damages because of CAW's unlawful conduct.

66. CAW cannot demonstrate that Reynolds would not have suffered these losses had it not been motivated, at least in part, by her race. 42 U.S.C. §20003-5(g)(2)(B).

67. Further, while multiple factors, known or unknown to Reynolds, might have motivated CAW to act as it did, Porter would not have suffered the harm which she did but for CAW's consideration of her race.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that this Court adopt jurisdiction of this action and award Plaintiff the following relief:

a. Enter a declaratory judgment that Defendant's policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured by Title VII and 42 U.S.C. §1981.

b. Grant Plaintiff a permanent injunction enjoining Defendant, its Agents, Successors, Employees, Attorneys, and those acting in concert with Defendant or at Defendant's request from violating Title VII and 42 U.S.C. §1981.

c. Grant Plaintiff an Order requiring Defendant's to make her whole by granting appropriate declaratory relief, back pay, punitive damages, compensatory damages (including damages for mental anguish), interest, attorney fees, expenses,

costs; and

d. Plaintiff prays for such other, further, different or additional relief and benefits as justice may require.

COUNT TWO

PLAINTIFF'S RACE CLAIMS UNDER 42 U.S.C. §1981 FAILURE TO PROMOTE

68. Reynolds is an African-American and a member of a protected class.

69. Reynolds was qualified for the position of superintendent.

70. In April 2025, Reynolds applied for the position of superintendent.

71. Two white men, who were less qualified than Reynolds, received the promotion to superintendent.

72. Reynolds white male supervisor, Harris, called her to tell her she did not receive the promotion. During the call, he told Reynolds he did not want to promote two candidates who were black males and preferred that they retire instead.

73. Harris told Reynolds he would promote her to superintendent of the Western Filter Plant, referred to as the "black employee plant."

74. In the summer of 2025, Harris directed Reynolds to train Templeton (white male). Reynolds told Harris she should not train Templeton without first receiving a promotion. Harris refused to consider giving Reynolds a promotion.

75. Later that summer, Templeton called Reynolds and told her that

Harris promised him the job of Senior Operator at Shades Mountain, otherwise known as the "white employee plant." Templeton added, that if for some reason he did not get the job, he would not help Reynolds get the job either.

76. Templeton eventually received the job of Senior Operator at Shades Mountain having less qualifications than Harris.

77. Under Harris' supervision 5 white men with less qualifications than Harris received promotions: Tommy Ryan, Stan Brock, Joshua Templeton, Jonathan Malloy, and Gage McPherson.

78. Templeton told Reynolds, "Your biggest problem as an African-American woman is that you don't know how to keep your mouth shut and stay in your place."

79. In August 2025, Reynolds moved laterally to the Shades Mount Plant. There she worked under the supervision of white male, Malloy.

80. In October 2025, Malloy told Reynolds, "I don't see you as a senior operator." "Your MBA degree is only for you [Reynolds] not the company, and if you leave the company you will take the degree with you." "So it (MBA degree) holds no value in evaluating you at the end of the year." Reynolds was not promoted because of her race.

81. Reynolds has suffered damages and lost wages because of CAW's illegal conduct.

82. Further, while multiple factors, known or unknown to Reynolds, might have motivated CAW to act as it did, Porter would not have suffered the harm which she did but for CAW's consideration of her race.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that this Court adopt jurisdiction of this action and award Plaintiff the following relief:

a. Enter a declaratory judgment that Defendant's policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured by 42 U.S.C. §1981.

b. Grant Plaintiff a permanent injunction enjoining Defendant, its Agents, Successors, Employees, Attorneys, and those acting in concert with Defendant or at Defendant's request from violating 42 U.S.C. §1981.

c. Grant Plaintiff an Order requiring Defendant's to make her whole by granting appropriate declaratory relief, back pay, punitive damages, compensatory damages (including damages for mental anguish), interest, attorney fees, expenses, costs; and

d. Plaintiff prays for such other, further, different or additional relief and benefits as justice may require.

COUNT THREE

PLAINTIFF'S CLAIMS OF TITLE VII SEX/GENDER DISCRIMINATION

83. Reynolds is a woman and a member of a protected class.

84. Reynolds is the first and only African American female IV Lead Operator in the company's approximately 150-year history at CAW.

85. CAW terminated Reynolds employment because of her gender.

86. Reynolds was told by a supervisor: "Men are not ready of a female superintendent"; "Your biggest problem as an African-American woman is that you don't know how to keep your mouth shut and stay in your place."

87. CAW terminated Reynolds employment because of her gender.

88. CAW was motivated to take these adverse actions against Reynolds because of her gender, even though other factors, known or unknown to Reynolds, may also have motivated it to act as it did.

89. Plaintiff has no plain, adequate or complete remedy at law to redress the wrongs alleged herein and this suit for back pay, front pay, compensatory damages, punitive damages, attorney's fees, injunctive relief and declaratory judgment is her only means of securing adequate relief.

90. Plaintiff is now suffering and will continue to suffer irreparable injury from Defendant's unlawful policies and practices as set forth herein unless enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that this Court adopt jurisdiction of this action and award Plaintiff the following relief:

a. Enter a declaratory judgment that Defendant's policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured by Title VII of the Civil Rights Act of 1964, as amended;

b. Grant Plaintiff a permanent injunction enjoining Defendant, its Agents, Successors, Employees, Attorneys, and those acting in concert with Defendant or at the Defendant's request from violating Title VII of the Civil Rights Act of 1964, as amended;

c. Grant Plaintiff an Order requiring the Defendant to make her whole by granting appropriate declaratory relief, compensatory damages (including damages for mental anguish), punitive damages, interests, attorney fees, expenses, costs; and

d. Plaintiff prays for such other, further, different or additional relief and benefits as justice may require.

COUNT FOUR

TITLE VII & 42 U.S.C. §1981
RETALIATION

91. Reynolds filed a written complaint with CAW in November 2025 about race and gender discrimination.

92. In February 2026, CAW suspended Reynolds without pay for failing a

drug screen. Reynolds held a valid prescription for medication.

93. On February 9, 2026, Reynolds complained to HR that she was being suspended without pay because of her race.

94. On February 27, 2026, Reynolds was fired for "hysterical behavior disrupting operations."

95. Reynolds firing was in retaliation for her complaints of race and gender discrimination.

96. Reynolds brings this retaliation claim pursuant to the causation standard for Title VII retaliation claims described by the Supreme Court in *Univ. of Tex. SW. Med. Cntr. v. Nassar,* 570 U.S. 338, 360 (2013).

97. While multiple factors, known or unknown to Reynolds, may have motivated CAW to act as it did, Reynolds would not have suffered the harm which he did but for CAW's retaliatory motivation.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that this Court adopt jurisdiction of this action and award Plaintiff the following relief:

a. Enter a declaratory judgment that Defendant's policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured by Title VII of the Civil Rights Act of 1964, as amended and 42 U.S.C. §1981.

b. Grant Plaintiff a permanent injunction enjoining Defendant, its Agents, Successors, Employees, Attorneys, and those acting in concert with Defendant or at the Defendant's request from violating Title VII of the Civil Rights Act of 1964, as amended; and 42 U.S.C. §1981.

c. Grant Plaintiff an Order requiring the Defendant to make her whole by granting appropriate declaratory relief, compensatory damages (including damages for mental anguish), punitive damages, interests, attorney fees, expenses, costs; and

d. Plaintiff prays for such other, further, different or additional relief and benefits as justice may require.

COUNT FIVE

SECTION 504 OF THE REHABILITATION ACT DISPARATE TREATMENT - TERMINATION

98. In February 2026, CAW suspended Reynolds without pay for failing a drug screen. Reynolds held a valid prescription for medication.

99. On February 27, 2026, Reynolds was told she was fired for "hysterical behavior disrupting operations."

100. CAW subjected Reynolds to adverse treatment based on her disability by terminating her employment.

101. Reynolds is an individual with on prescription medication which without taking this medication can substantially limits her abilities of working, a

major life function.

102. Reynolds has a disability for purposes of Section 504 of the Rehabilitation Act.

103. CAW was aware that Reynolds her disability, and her supervisors had full knowledge of the disability and how it impacted Reynolds. CAW regarded her as having such a disability.

104. Reynolds was a qualified individual capable of performing the essential functions of the job.

105. Reynolds contends that Ray Sloan, Brian Lewis, and Tim Harris, had a discriminatory animus against Reynolds due to her disability. This can be demonstrated by being suspended for failing a drug screen for which she had a valid prescription and then being fired for "hysterical behavior disrupting operations."

106. Reynolds contends that CAW was motivated to take these actions against her because of her disability, even though other factors, known or unknown to her, may also have motivated it to act. Reynolds contends that, even if other factors were also involved, CAW would not have taken the adverse actions but for its consideration of her disability.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that this Court adopt jurisdiction of this

action and award Plaintiff the following relief:

a. Enter a declaratory judgment that Defendant's policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured by Rehabilitation Act;

b. Grant Plaintiff a permanent injunction enjoining Defendant, its Agents, Successors, Employees, Attorneys, and those acting in concert with Defendant or at the Defendant's request from violating the Rehabilitation Act.

c. Grant Plaintiff an Order requiring the Defendant to make her whole by granting appropriate declaratory relief, compensatory damages (including damages for mental anguish), interests, attorney fees, expenses, costs; and

d. Plaintiff prays for such other, further, different or additional relief and benefits as justice may require.

COUNT SIX

SECTION §1983 EQUAL PROTECTION CLAIM OF SEXUAL HARASSMENT HOSTILE WORK ENVIRONMENT AGAINST TIM HARRIS IN HIS OFFICIAL AND INDIVIDUAL CAPACITY

107. During a company trip to Anaheim, California on June 12, 2024, and intoxicated Harris, approached Reynolds in the hotel lobby. In front of several other co-workers in the hotel lobby, Harris asked Reynolds to go with him to his hotel room. Reynolds declined his offer. Harris repeated his requests to Reynolds to go to his room. Harris repeatedly said to Reynolds, "I need help taking 3 collared shirts to

my room." Reynolds declined this invitation twice. Harris continued asking and then stated he needed help back to his room because he was drunk.

108. Reynolds eventually agree to walk with Harris to his room. When Harris opened the door to the room, Reynolds remained outside the room. Harris kept begging Reynolds to step inside the room to "see how nice the room is." Reynolds stepped in quickly to see the room. Reynolds was leaving the bathroom area, when Harris standing behind her said, "I'm trying to get some pussy tonight." Reynolds was offended and afraid and left Harris' hotel room without responding.

109. In May 2025, during a Partnership for Safe Drinking Water meeting, Harris called Reynolds aside privately and said to her, "you are so beautiful,"; "you are in the wrong field"; and "should be a model instead of working in water treatment."

110. In or around October 2025 while working at the Western Filter Plant during a filter rehabilitation project, Harris was walking towards Reynolds in the hallway. Reynolds asked Harris, "Where are you going?" To which Harris responded, "To the restroom. Do you want to help me?" Reynolds was offended and embarrassed by this sexual remark.

111. Reynolds was harassed because of her sex.

112. Harris intentionally committed acts that create a hostile work environment for Reynolds personally.

113. Harris had supervisory authority over Reynolds.

114. Harris violated Reynolds Equal Protection under the Fourteenth Amendment based on her gender by subjecting her to a sexually hostile work environment.

115. Harris has suffered damages because of the hostile work environment.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that this Court adopt jurisdiction of this action and award Plaintiff the following relief:

a. Enter a declaratory judgment that Defendant's policies, practices and procedures complained of herein have violated and continue to violate the rights of the Plaintiff as secured Section 1983 and the Equal Protection Clause of the Fourteenth Amendment;

b. Grant Plaintiff a permanent injunction enjoining Defendant, its Agents, Successors, Employees, Attorneys, and those acting in concert with Defendant or at the Defendant's request from violating the Fourteenth Amendment;

c. Grant Plaintiff an Order requiring the Defendant to make her whole by granting appropriate declaratory relief, compensatory damages (including damages for mental anguish), interests, attorney fees, expenses, costs; and

d. Plaintiff prays for such other, further, different or additional relief and benefits as justice may require.

PLAINTIFF HEREBY REQUESTS TRIAL BY STRUCK JURY

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