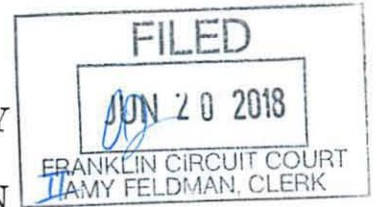


COMMONWEALTH OF KENTUCKY
48th JUDICIAL CIRCUIT
FRANKLIN CIRCUIT COURT – DIVISION
CIVIL ACTION NO. 18-CI- 00629



SHAKA TAUHID BRIDGES

PLAINTIFF

vs.

**COMPLAINT
JURY TRIAL DEMANDED**

FRANKLIN COUNTY SHERIFF'S OFFICE

DEFENDANT

Serve: Pat Melton
Franklin County Sheriff's Office
974 Riverbend Rd.
Frankfort, KY 40601

* * * * *

Plaintiff Shaka Tauhid Bridges for his Complaint against defendant states as follows:

I

Nature of the Case

1. This action arises from defendant's unlawful and discriminatory employment practices based on plaintiff's race. Plaintiff seeks recovery of lost pay and benefits past and future, compensatory damages, costs, expenses and attorney's fees to remedy his injuries.

II

Jurisdiction and Venue

2. Franklin Circuit Court has jurisdiction over this matter pursuant to KRS 23A.010. Venue is proper in Franklin Circuit Court, because the claims asserted herein arose in Franklin County, Kentucky.

III

Parties

3. Plaintiff Shaka Tauhid Bridges is a citizen of the United States of America and a resident of Franklin County, Kentucky.

4. Defendant Franklin County Sheriff's Office is a constitutionally-established office of the county government endowed with certain and various powers.

IV

Facts Giving Rise to Lawsuit

5. Bridges, who is an African-American male, at all times pertinent hereto and up to on or about May 31, 2018, was an employee of the Franklin County Sheriff's Office (referred to hereinafter as "the Sheriff's Office").

6. Bridges, at all times pertinent hereto, was the "employee" of the Sheriff's Office within the meaning and application of KRS 344.040.

7. The Sheriff's Office, at all times pertinent hereto, was the "employer" of Bridges within the meaning and application of KRS 344.040.

8. Bridges, at all times pertinent hereto, performed his job and—executed all other duties and responsibilities assigned him in exemplary and outstanding fashion.

9. Bridges, in addition to performing his own regular job duties, performed numerous and various other and additional duties and tasks for the Sheriff's Office.

10. The scope and breadth of Bridges' regular and actual job duties exceeded that of white deputy sheriffs who were paid far more than Bridges, although their actual job duties and responsibilities were far less.

11. Bridges requested of the Franklin County Sheriff, Pat Melton, on numerous occasions to ameliorate the pay inequities that he endured in comparison with white deputy sheriffs, who were paid more but had less responsibility.

12. Melton never acted to address or ameliorate the pay inequity for Bridges, although he claimed on numerous occasions that he intended to.

13. Melton's failure to address or ameliorate the pay inequity faced by Bridges established a racially discriminatory employment practice as a term and condition of Bridges' employment with the Sheriff's Office.

14. As a direct and proximate result of the wrongful and unlawful racially discriminatory employment practices by the Franklin County Sheriff's Office, Bridges has suffered and is reasonably certain to suffer in the future injuries and damages including loss of income and benefits, emotional distress and mental anguish, embarrassment and humiliation and violation of his rights.

V

Causes of Action

Count 1 – Racially Discriminatory Pay Practices

15. Bridges incorporates paragraphs 1 through 14 hereof as if fully set forth herein.

16. A substantial factor but for which the pay inequity and discriminatory employment practices endured by Bridges would not have existed was his race.

17. The racially discriminatory employment practices by the Sheriff's Office violated KRS Chapter 344.

18. As a direct and proximate result of the wrongful and unlawful racially discriminatory employment practices by the Franklin County Sheriff's Office, Bridges has suffered and is reasonably certain to suffer in the future injuries and damages including loss of income and benefits, emotional distress and mental anguish, embarrassment and humiliation and violation of his rights.

VI

Demand for Relief

WHEREFORE, plaintiff Shaka Tauhid Bridges demands entry of judgment against defendant as follows:

(1) awarding him monetary damages in an amount to fairly compensate him for injuries pleaded herein, including loss of income and benefits, past, present and future; emotional distress and mental anguish; embarrassment and humiliation;

(2) awarding him attorney's fees, costs and litigation expenses in accordance with KRS 344.450 and CR 54; and,

(3) all other relief to which he is entitled.

Demand for Trial by Jury

Plaintiff demands pursuant to CR 38 trial by jury of all issues herein so triable.



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