

[REDACTED] v. Olathe Public Schools, USD 233

1. My name is [REDACTED]. I am currently the [REDACTED] for the Olathe School District, USD 233. I have worked for the Olathe School District for 18 years. During that time, my work has always been praised, and I have received pay raises and promotions. Until the events giving rise to this charge, I had no disciplinary history.

2. On October 23, 2019, Richard Wilson, the Director of Curriculum and Assessment, texted me at 9:23pm regarding a work-related question. I responded later the same day. The next day he stood in my office and said that when he received my response to his question he was in bed with his wife. He said his wife was not happy. His comments made me uncomfortable.

3. Subsequently, the following month, in November 2019, while reviewing a document with me in my office, Mr. Wilson sat very close to me and placed his hand on my upper thigh. I was frightened by his advance and frozen in a state of shock. Mr. Wilson removed his hand and left my office.

4. In December 2019, I reported to Dr. Brent Yeager, the Assistant Superintendent at the time, that Rich Wilson made inappropriate comments and touched me. I also specifically told Dr. Yeager that it was difficult to work with Mr. Wilson, in light of his unwanted touching and his inappropriate comments. Dr. Yeager acknowledged that Mr. Wilson's behavior was inappropriate. To my knowledge, no other measures were taken to address Mr. Wilson's behavior.

5. In December 2019, I had a meeting with Mr. Wilson, where I specifically told him that his touching was unwanted and that his comments were inappropriate. Mr. Wilson reacted in a hostile manner, did not acknowledge the inappropriateness of his conduct, and told me to "stay in my lane."

6. Between October 2019 and August 2021, Mr. Wilson made inappropriate comments to me, looked at me inappropriately, touched me, demeaned me in his words and actions, and slandered me to my colleagues. His comments included referring to me as his "work wife," telling me that I reminded him of his wife, commenting on my attire or how I look, and generally staring at me in a leering fashion.

7. From December 2019 until November 2021, Mr. Wilson also engaged in various retaliatory actions, following my report of his sexual harassment and my direct opposition to him of his unwanted conduct. These actions include, but are not limited to: belittling me, raising his voice to me, criticizing my work without a basis, glaring at me, and generally making it difficult to work in a collaborative fashion with him, as my job duties require.

8. In December 2020, Ms. Jill Beckman in Human Resources requested to meet with me via Zoom. She shared that the former Assistant Superintendent of Learning Services, Dr. Yeager, told her Mr. Wilson and I were not getting along. I asked her if that was all that Dr. Yeager had told her and she said "yes." I told her that was not the truth. As I began to cry, I told her that Mr. Wilson had touched me inappropriately and made inappropriate comments to me. Ms. Beckman was visibly upset and stated that Mr. Wilson's actions were not acceptable, shared that she had

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been harassed as a young employee, and told me I should file the Title IX complaint. I filed a complaint at that time.

9. During the entire period, from November 2019 through the present, I experienced significant emotional distress, both because of the harassment itself, and because of the ongoing severe and pervasive retaliation.

10. On April 29, 2021, while I was in a meeting with Mr. Wilson and others, he leered at my chest. His staring made me extremely uncomfortable, especially in light of the previous incidents of harassment and his ongoing harassment.

11. On May 3, 2021, the District issued a decision on my Title IX case finding merit to my claims.

12. On May 4, 2021, I notified the Title IX coordinator of a second Title IX complaint referencing the April 2021 incident described above. My formal written complaint about the incident was received on June 9, 2021.

13. Following my second complaint of harassment through the present, the District's retaliation against me intensified. The District's retaliation included, but is not limited to: continued interference with my job duties, by subjecting me to stricter scrutiny, by removing significant job duties, and by unfairly criticizing my work. My duties were curtailed in a way that made no sense, and I was given strict instructions about whom I was permitted to contact or to whom I was permitted to reply. Prior to my reports of sexual harassment, I had never been subjected to these types of constraints on my job. To the contrary, my work had always been praised.

14. On July 20, 2021, the district further retaliated against me by asserting that if I wanted to stay in Learning Services, I needed to be able to work collaboratively with Mr. Wilson. The District then offered me a demotion to an assistant principal position at a middle school or a separation from the District. I declined both options and filed a retaliation complaint with the District's Title IX office.

15. On October 22, 2021, I was notified for the first time that Mr. Rich Wilson filed a complaint against me on August 30, 2021 asserting that I had maliciously made claims of harassment against him. The District purported to investigate the "matter," through a biased investigation. The investigation appeared to disregard previous complaints from other women about Mr. Wilson.

16. On November 8, 2021, I was told the District planned to eliminate my position. I was given the opportunity to resign, or, if I chose to complete the school year, I was told I could not physically return to the Olathe Public Schools campus and that I was expected to work from home with very limited duties. Since then, until the present, I have been given confusing and conflicting guidance about my duties. I have been and remain distraught by the District's having banned me from its premises.

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17. As set forth above, from October 2019 until the present, I have been subjected to ongoing severe and pervasive sexual harassment and retaliation and wrongful termination from my position. I have experienced significant emotional distress and trauma at the way I have been treated. I seek all damages available pursuant to Title VII, including emotional distress damages and attorney fees.