

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION

RONDA RIMMER

PLAINTIFF

VS.

CIVIL ACTION NUMBER

4:25-CV-42-DMB-JMV

GREENWOOD LEFLORE CONSOLIDATED SCHOOL DISTRICT

DEFENDANT

COMPLAINT - JURY TRIAL DEMANDED

COMES NOW, Ronda Rimmer (i.e. hereinafter referred to as the "Plaintiff" in the instant "Complaint"), by and through counsel, and files this her Complaint of and against Greenwood Leflore Consolidated School District (i.e. hereinafter referred to as the "Defendant" in the instant "Complaint") and in support thereof, Plaintiff would respectfully show unto this Honorable Court the following, to wit:

1. That the following allegations are based on personal knowledge a to Plaintiff's own conduct and on information and belief as to the acts of others.

INTRODUCTION

2. That the instant civil action challenges Defendant's unlawful discrimination based on (a) religion - engaging in protected activity and (b) retaliation for engaging in protected activity. Plaintiff alleges that Defendant violated the applicable provisions of Title VII.

JURISDICTION OF THE FEDERAL COURT

3. That this Honorable Court has federal question and civil rights jurisdiction for a cause of action arising under Title VII of the Civil Rights Act Of 1964.

4. That this Honorable Court has personal and subject matter jurisdiction over the Defendant in these premises and that venue is proper in this Court.

5. That jurisdiction of this Honorable Court is invoked pursuant to the Family And Medical Leave Act Of 1993.

6. That Plaintiff, at all times relevant to this Complaint, was employed with Defendant in the Northern District Of Mississippi, therefore, venue is proper in the Northern District Of Mississippi as Plaintiff's cause (s) of action arose within the Northern District Of Mississippi - Greenville Division in that a substantial part of the acts and omissions giving rise to the claim (s) in this instant civil action occurred in this District. Venue is further proper in this District because Defendant is subject to personal jurisdiction therein by virtue of their substantial, continuous, and

systematic commercial activities in this District. (See 28 U.S.C. Section 1391 (b), (c). Because Defendant is subject to personal jurisdiction in this Division, it “resides” in this Division for venue purposes. (see 28 U.S. C. Section 1391 (c)).

THE PARTIES

7. That Plaintiff is an adult resident citizen of the Second Judicial District Of Bolivar County, Mississippi.

8. That Greenwood Leflore Consolidated School District (i.e. hereinafter referred to as “Defendant” in the instant Complaint - Jury Trial Demanded”) is “Mississippi governmental entity” existing and operating in accordance with the applicable laws of the State Of Mississippi. Defendant, may be served with process of this Honorable Court by serving James Johnson - Wadlington, Superintendent of the Greenwood Leflore Consolidated School District at 1901 Highway 82 West, located in Greenwood, Mississippi 38930.

NOTICE OF RIGHT TO SUE PROCEDURAL POSTURE

9. That on or about October 25, 2024, Plaintiff filed her certain “Charge Of Discrimination” with the Equal Employment Opportunity Commission. [See Exhibit “A” attached hereto]. All allegations contained in “these charges” are hereby incorporated in the instant Complaint by reference.

10. That the Equal Employment Opportunity Commission authored its certain “Notice Of Right To Sue” letter to Plaintiff dated “January 6, 2025.” Plaintiff “received” said “notice” on or about November 11, 2023. [See Exhibit “B” attached hereto].

11. That the instant civil action was commenced within ninety (90) days from Plaintiff’s receipt of the afore referenced “Right To Sue” letter.

FACTS

12. That Plaintiff commenced her employment with Defendant on or about July 4, 2022.

13. That subsequent to Plaintiff’s engagement with Defendant, as an employee, multiple personnel stated unto her (i.e. Plaintiff) that she should not associate with a certain employee (i.e. Mary Johnson) because of her religion. Plaintiff continued her friendship with Ms. Johnson because they shared religious values. Plaintiff, following “district protocol” and advised her superiors (i.e. Board Of Directors) that she was being harassed, but no action was taken.

14. That Plaintiff avers that in or about May 2024, she, in accordance with the applicable “district protocol”, complained that her overtime wages were not correctly calculated. Subsequent thereto, in an around June 20, 2024, while Plaintiff was exercising “Family Medical Leave”, she learned that she had been demoted to a regular secretary in the special education department. In addition to the demotion, Plaintiff avers that a hostile work environment was created and Plaintiff felt compelled and forced to resign her position with Defendant.

COUNT II - VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 - DISPARATE IMPACT ON THE BASIS OF RELIGION

15. That Plaintiff re - alleges and incorporates all averments set forth herein above in Paragraph Number 1 through Paragraph Number 14 of the instant Complaint.

16. That Title VII of the Civil Rights Act Of 1964 makes it illegal for an employer to limit, segregate, of classify his employee or applicant in any way which will deprive or tend to deprive any individual of employment opportunities because of an individual’s religion. [See 42 U.S.C. Section 2000e - 2 (a) (2)].

COUNT III - VIOLATION OF THE FAMILY MEDICAL LEAVE ACT OF 1993 (FMLA) - RETALIATION

17. That Plaintiff re - alleges and incorporates all averments set forth herein above in Paragraph Number 1 through Paragraph Number 16 of the instant Complaint.

18. That Defendant retaliated against Plaintiff for qualifying for and / or taking federally protected leave under FMLA, 29 U.S.C. Section 2601, et . Seq. It is in unlawful for any employer to interfere with, restrain, or deny the exercise or attempt to exercise, any right provided under the FMLA. In addition, it is unlawful for any employer to discharge or discriminate against any individual for opposing any practice made unlawful by the FMLA.

19. That Defendant discriminated against Plaintiff and retaliated against her based on her FMLA leave in violation of the FMLA.

20. That as a result of Defendant’s intentional, discriminatory and unconstitutional acts described herein above, Plaintiff has been caused to suffer and continues to suffer with mental anguish, humiliation, emotional distress, all to her detriment and compensable at law.

21. That the wrongful conduct of Defendant is evidenced by a consciously indifferent attitude towards employees’ right (s) under the FMLA. As a result of this conduct, punitive damages in excess of the minimum jurisdictional limits of this Honorable Court should be assessed against Defendant as to deter this type of conduct in the future.

22. That Plaintiff also seeks any and all other relief, at law or in equity, to which he may show herself justly entitled.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully prays that upon hearing of this instant matter by a jury, that Plaintiff be granted relief in an amount to be determined by the jury, to wit:

- a. That she be awarded lost wages, employment benefits and other compensation lost to her as a result of Defendant's discriminating and retaliating against her;
- b. That she be awarded pre - judgment interest;
- c. That she be awarded liquidated damages doubling the award of interest, wages, lost employment benefits, and other compensation lost to her as a result of Defendant's discriminating and retaliating against her;
- d. That she be awarded reasonable attorney's fees, expert witness fees, and costs of this instant civil action and of any and all prior administrative action (s); and
- e. That she be awarded any and all such other relief that this Honorable Court deems appropriate in these premises

DEMAND FOR JURY TRIAL

That pursuant to the applicable provisions of Rule 38 of the Federal Rules Of Civil Procedure, Plaintiff respectfully demands a trial by jury of all issues so triable in this instant civil action.

Respectfully submitted, this the 6th day of April of 2025.

RONDA RIMMER, PLAINTIFF

BY: /s/ Brandon I. Dorsey
BRANDON I. DORSEY, MSB # 100291
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

BRANDON I. DORSEY, PLLC
POST OFFICE BOX 13427
JACKSON, MISSISSIPPI 39236 - 3427
TELEPHONE: (601) 969 - 6960
FACSIMILE: (601) 969 - 6959
E - MAIL: brandonlawpllc@aol.com

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974.
See attached Privacy Act Statement and other information before completing this form.

CHARGE PRESENTED TO:

EEOC

AGENCY CHARGE NO.

423-2024-01653

Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev.): Mrs. Ronda Rimmer

Home Phone: 662-545-7699

Year of Birth: 1975

Street Address: 23 Rose Ln

CLEVELAND, MS 38732

Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe discriminated against me or others.

Name: GREENWOOD LEFLORE CONSOLIDATED SCHOOL DISTRICT

No. Employees, Members: 501+ Employees

Phone No.:

Street Address: 1901 HIGHWAY 82 W

GREENWOOD, MS 38930

Name:

No. Employees, Members:

Phone No.:

Street Address:

DISCRIMINATION BASED ON:

Religion, Retaliation

DATE(S) DISCRIMINATION TOOK PLACE

Earliest: 09/21/2022

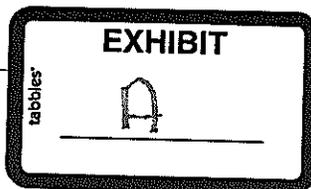
Latest: 08/18/2024

THE PARTICULARS ARE:

I was hired by the above-referenced employer on or around July 4, 2022, as the Board Clerk/Executive Assistant.

Soon after I began working for the respondent, multiple management officials told me I should not associate with Mary Johnson because of her religiosity. Despite repeatedly being told to stay away from her, I became friendly with her because we share the same religious values. I became involved in activities with her church and felt targeted by the respondent after I began associating with her. Although I complained to the Board Director about being harassed and singled out, no action was taken. Around late May 2024, I complained that my overtime wages were not correctly calculated and informed the respondent that they did not fully compensate me for my work. Soon after, around June 20, 2024, while I was still on FMLA, I learned that the respondent demoted me to be a regular Secretary in the Special Education department. Because of the demotion and the hostile environment the respondent subjected me to, I felt compelled to resign on August 18, 2024.

I believe I was discriminated against on the basis of my religion (Christian), in violation of Title VII of the Civil Rights Act of 1964, as amended, and in retaliation for engaging in protected activities.



EEOC Form 5 (07/24)

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Digitally Signed By: Mrs. Ronda Rimmer

10/25/2024

Charging Party Signature & Date

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

Signature of Complainant

Subscribed and sworn to before me this date:

CP Enclosure with EEOC Form 5 ((

PRIVACY ACT STATEMENT

Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (06/24).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so *within 15 days* of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA, Section 207(f) of GINA, and 42 USC 2000gg-2(f)(1) of the PWFA it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Jackson Area Office
100 West Capitol Street, Suite 338
Jackson, MS 39269
(769) 487-6910
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS (This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 01/06/2025

To: Mrs. Ronda Rimmer
23 Rose Ln
Cleveland, MS 38732
Charge No: 423-2024-01653

EEOC Representative and email: Diego Zent
Enforcement Investigator
diego.zent@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 423-2024-01653.

On behalf of the Commission,

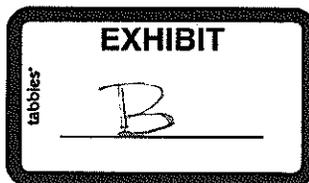
Digitally Signed By: Eszean McDuffey
01/06/2025

Eszean McDuffey
Area Office Director

Cc:
Derrick Simmons- Dtsimmons@simmonspllc.com
Greenwood Leflore Consolidated
1901 HIGHWAY 82 W, Greenwood, MS 38930

Rosalyn Griffin- Rgriffin@glcsd.org
James Waldington- Jdjw@glcsd.org
Greenwood Leflore Consolidated
1901 HIGHWAY 82 W, Greenwood, MS 38930

Please retain this notice for your records.



**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

(This information relates to filing suit in Federal or State court under Federal law. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)

IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive this Notice**. Receipt generally means the date when you (or your representative) opened this email or mail. You should **keep a record of the date you received this notice**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving it (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA, the ADEA, or the PWFA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA, the ADEA or the PWFA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of this Notice and within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

ATTORNEY REPRESENTATION

For information about locating an attorney to represent you, go to:
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS

There are two ways to request a charge file: 1) a Freedom of Information Act (FOIA) request or 2) a "Section 83" request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of this notice, please submit your FOIA and/or Section 83 request for the charge file promptly to allow sufficient time for EEOC to respond and for your review.

To make a FOIA request for your charge file, submit your request online at <https://eeoc.arkcase.com/foia/portal/login> (this is the preferred method). You may also submit a FOIA request for your charge file by U.S. Mail by submitting a signed, written request identifying your request as a "FOIA Request" for Charge Number 423-2024-01653 to the US EEOC- Birmingham District Office, 1130 22nd Street South, Suite 2000, Birmingham, AL 35205.

To make a Section 83 request for your charge file, submit a signed written request stating it is a "Section 83 Request" for Charge Number 423-2024-01653 to the US EEOC- Birmingham District Office, 1130 22nd Street South, Suite 2000, Birmingham, AL 35205.

You may request the charge file up to 90 days after receiving this Notice of Right to Sue. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA requests, go to <https://www.eeoc.gov/eeoc/foia/index.cfm>.

For more information on submitted Section 83 requests, go to <https://www.eeoc.gov/foia/section-83-disclosure-information-charge-files>.