

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

CAROLYN FILIPPONE,

Plaintiff,

Case Number:

v.

ROB TURNER, as HILLSBOROUGH
COUNTY PROPERTY APPRAISER,

Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, CAROLYN FILIPPONE, (“**Filippone**”) by and through Plaintiff’s undersigned counsel, hereby brings this action against Defendant ROB TURNER (“**Turner**”), in his capacity as Hillsborough County Property Appraiser and states:

1. This is an action brought under Title VII of the Civil Rights Act of 1964, as amended, for damages, injunctive relief and other remedies authorized by law.
2. Filippone was engaged by the office of the Hillsborough County Property Appraiser and assigned the duties of its Personnel Director.
3. Rob Turner is the elected official charged with the duty and responsibility to appraise all of the real and personal property in Hillsborough County and to perform other related duties such as maintaining current legal descriptions and ownership tax maps of all real property in Hillsborough County.
4. On March 22, 2010 Filippone filed a Complaint of Employment Discrimination with the United States Equal Employment Opportunity Commission. In that complaint she

alleged, amongst other things that Turner had engaged in conduct unlawful under Title VII of the Civil Rights Act of 1964, as amended.

5. On May 21, 2012 Turner fired Filippone.

6. Filippone is an "employee" within the meaning of Title VII of the Civil Rights Act of 1964, as amended.

7. Turner, as the Hillsborough County property appraiser, is an "employer" within the meaning of Title VII of the Civil Rights of 1964, as amended.

8. By filing a Complaint with the United States Equal Employment Opportunity Commission and engaging in the Commission's processes, Filippone participated in a proceeding brought under Title VII of the Civil Rights of 1964, as amended.

9. Turner fired Filippone in violation of her rights as a participant in a proceeding under Title VII of the Civil Rights Act of 1964, as amended.

10. Filippone had been damaged by Turner's unlawful conduct. She has lost pay and benefits and will continue to lose pay and benefits. Her termination has caused her emotional injuries, including the loss of enjoyment of life, diminished self-esteem and becoming fearful about her personal and professional well-being.

11. Filippone has exhausted all administrative remedies required of her to bring this action or the same have been waived.

12. Filippone has engaged the undersigned lawyers and agreed to pay them a fee.

WHEREFORE, Filippone prays that the Court will:

- a) take jurisdiction over the cause and the parties;
- b) grant her a jury trial;
- c) award her back pay;

- d) award her damages;
- e) reinstate her to her position or, in the alternative, award her front pay;
- f) award her prejudgment interest;
- g) award her attorney's fees and costs; and
- h) grant such other relief as is just and equitable

JURY TRIAL DEMAND

Plaintiff demands trial by jury as to all issues.

Respectfully submitted,

/s/ Christopher P. Jayson _____

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and

/s/ Steven G. Wenzel _____

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Attorneys for Plaintiff

JS 44 (Rev 09/10)

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

CIVIL COVER SHEET

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law.

Plaintiff(s):

First Listed Plaintiff:
Carolyn Filippone ;
County of Residence: Hillsborough County

Defendant(s):

First Listed Defendant:
Rob Turner, as Hillsborough County Property Appraiser ;
County of Residence: Outside This District

County Where Claim For Relief Arose: Hillsborough County

Plaintiff's Attorney(s):

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Basis of Jurisdiction: 3. Federal Question (U.S. not a party)

Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff: N/A
Defendant: N/A

Origin: 1. Original Proceeding

Nature of Suit: 790 Other Labor Actions

Cause of Action: Title VII of the Civil Rights Act of 1964

Requested in Complaint

Class Action: Not filed as a Class Action

Monetary Demand (in Thousands):

Jury Demand: Yes

Related Cases: Is NOT a refiling of a previously dismissed action

Signature: /s/Christopher P. Jayson

Date: 07/03/12

If any of this information is incorrect, please close this window and go back to the Civil Cover Sheet Input form to make the correction and generate the updated JS44. Once corrected, print this form, sign and date it, and submit it with your new civil action.