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CASE NO. _____

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JEFFERSON CIRCUIT COURT

DIVISION WLKY

JUDGE _____

ELECTRONICALLY FILED

LAUREN CARBY

PLAINTIFF

v.

COMPLAINT

LOUISVILLE METRO GOVERNMENT

D/B/A LOUISVILLE METRO POLICE DEPARTMENT

DEFENDANT

SERVE: Mayor Craig Greenberg
527 W. Jefferson St.
Louisville, KY 40202

*** **

Comes the Plaintiff, Lauren Carby, and in support of her Complaint against the Defendant, Louisville Metro Government D/B/A Louisville Metro Police Department (hereinafter referred to as "LMPD") states as follows:

PARTIES

1. Plaintiff Lauren Carby ("Lauren") is a resident of Jefferson County, Kentucky, and was at all times relevant hereto.
2. Defendant Louisville Jefferson County Metro Government, d/b/a Louisville Metro Police Department ("LMPD") is a police department located in Jefferson, Kentucky, and has eight or more employees within the state.
3. At all times relevant herein, Plaintiff was an employee of LMPD.
4. At all times relevant herein, Shannon Lauder was an employee of LMPD.
5. At all times relevant herein, Jeff Lauder was an employee of LMPD.
6. At all times relevant herein, Mindy Vance was an employee of LMPD.

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7. At all times relevant herein, the position of LMPD Interim Police Chief was held by Robert Schroeder and Yvette Gentry, *in seriatim*, and the position of LMPD Police Chief was held by Erika Shields and Jacquelyn Gwynn-Villaroel, *in seriatim*.

8. At all times relevant herein, Shannon Lauder, Jeff Lauder, Mindy Vance, that the individuals that served as LMPD police chiefs outranked and were superiors to Lauren Carby.

JURISDICTION & VENUE

9. Subject matter jurisdiction over this action exists under Section 112 of the Kentucky Constitution because the amount in controversy, excluding interest, costs, and attorney fees, exceeds the jurisdictional prerequisites of this Court. The action is also specifically authorized by KRS Chapters 61 and 344.

10. Venue is proper in the Jefferson Circuit Court because actions giving rise to this complaint occurred in Jefferson County, Kentucky, and all parties are employed and work in Jefferson County, Kentucky.

FACTUAL BACKGROUND

11. Lauren Carby has been a police officer for approximately thirteen (13) years.

12. She first served as an officer in LMPD's first (1st) Division.

13. In May 2015, she became a Domestic Violence Detective in LMPD's Special Victims Unit.

14. In February 2023, Lauren took the LMPD Sergeant's examination, scored well, and was promoted to the rank of Sergeant ("Sgt.") in August 2023.

15. Upon promotion, Lauren was assigned to LMPD's Fifth (5th) Division, where she remains a Sergeant.

16. While Lauren worked as a Domestic Violence detective, Shannon Lauder was the

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Lieutenant (“Lt.”) Commander of the Special Victims Units (SVU), where she commanded and supervised the Domestic Violence, Sex Crimes, and Crimes against Children Units.

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17. Shannon Lauder was Lauren’s command superior and supervisor.

18. At all times relevant herein, Shannon Lauder was and currently is married to LMPD Lt. Jeff Lauder.

19. During time as SVU Lt. Commander, Shannon Lauder was often grossly inappropriate in front of and toward officers under her command in workplace environments, including but not limited to in the SVU office spaces.

20. Upon information and belief, while on the job, Shannon Lauder repeatedly bragged to multiple detectives under command that once a woman she met on the job complimented her by saying that she had “good d*** sucking lips.”

21. Upon information and belief, while on the job, Shannon Lauder told multiple detectives under her command that she “loves it when Jeff c*** on her face,” referring to her desire and sexual preference for her husband, Jeff Lauder, to ejaculate on her face.

22. Upon information and belief, while on the job, Shannon Lauder told multiple detectives under command that she and Jeff often played a game where they made wagers with the understanding that the partner who lost the bet would perform specific sexual acts of the winner’s choice.

23. Upon information and belief, while on the job, Shannon Lauder showed multiple detectives under her command pictures on her phone of her husband’s body.

24. Upon information and belief, while on the job, Shannon Lauder frequently spoke with multiple detectives under her command, in intimate detail, about her sex life, sexual preferences, and various sexual acts in which she had engaged.

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25. Upon information and belief, while Shannon Lauder was the Lt. Commander of the SVU, it was widely rumored and believed by many in her command staff that she was engaged in a sexual relationship with a LMPD Sex Crimes Detective under her command.

26. Upon information and belief, Shannon Lauder and said Sex Crimes Detective frequently spent significant amounts of time in her office, behind closed doors, during work hours, something did not occur with other detectives under her command.

27. Upon information and belief, other detectives under her command believed that said Sex Crimes Detective received special attention and preferential treatment and opportunities from Shannon Lauder in comparison to other SVU detectives.

28. Upon information and belief, Shannon Lauder chose the aforementioned Sex Crimes Detective, out of approximately 6-8 detectives assigned to the Sex Crimes unit at the time, to attend a law enforcement related event alone with her in Thailand.

29. Upon information and belief, Thailand trip was canceled due to the global Covid-19 Pandemic.

30. Shortly before August 2020, LMPD Interim Police Chief Robert Schroder promoted Shannon Lauder from Lt. to the rank of Major and assigned her to command the first (1st) patrol division of LMPD.

31. At that time, Jeff Lauder held the rank of Sergeant and was assigned to LMPD's Training Unit.

32. Upon information and belief, Jeff Lauder was promoted to the rank of Lieutenant following the events of August 2020, further described herein, and appointed the Lieutenant Commander of LMPD's Special Weapons and Tactics ("SWAT") Unit.

33. Upon information and belief, Plaintiff held the rank of officer at the time Jeff

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Lauder held the rank of Sergeant.

34. On August 1, 2020, Shannon and Jeff Lauder hosted a pool party at their home and, as she had just been promoted from SVU Lt. Commander to Major, Shannon Lauder invited all members of the LMPD SVU to attend.

35. Many members of LMPD SVU attended the party, included but not limited to Domestic Violence Unit Detectives and Sex Crimes Detectives, as well as members of LMPD's SWAT Team.

36. On August 1, 2020, prior to the pool party, Shannon Lauder reached out to Lauren to clarify that children were not invited to the pool party and stressed it was an "adult only" event and, subsequently, called Lauren to inquire as to when she would arrive at the party.

37. Upon Lauren's arrival, she was greeted by Shannon Lauder, who immediately asked where Lauren's husband was.

38. Lauren explained that her husband stayed home with the children.

39. Early in the evening, members of the Domestic Violence Unit observed Jeff Lauder and the aforementioned Sex Crimes Detective laughing and drinking together.

40. The detectives were surprised and confused by the interactions, given their understanding that Shannon Lauder and the aforementioned Sex Crimes Detective were involved in an extra-marital intimate relationship.

41. Upon information and belief, as the night progressed, both Shannon and Jeff Lauder appeared to become very intoxicated.

42. Upon information and belief, Shannon Lauder and the aforementioned Sex Crimes Detective were seen openly kissing, in front of numerous party guests, before the two disappeared from the party together for an extended period of time.

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43. While Shannon Lauder and the aforementioned Sex Crimes Detective were gone, Jeff Lauder approached Lauren and repeatedly made unwanted, unsolicited sexual advances toward her, which she repeatedly rejected.

44. Jeff Lauder made multiple inappropriate comments about Lauren's appearance and her body.

45. Jeff propositioned Lauren for sex and expressed his desire to enter into an ongoing, sexual relationship with her.

46. He told Lauren that he "had wanted her" for approximately eight (8) years.

47. Jeff Lauder explained to Lauren that Shannon Lauder and the aforementioned Sex Crimes Detective had a separate relationship and that he had given Shannon permission to "disappear" from the party with the aforementioned Sex Crimes Detective.

48. Jeff Lauder told Lauren that Shannon Lauder had her ongoing extramarital relationship with the aforementioned Sex Crimes Detective and that he had also been in an extramarital relationship that ended fairly recently.

49. He said he had received permission from Shannon Lauder to approach Lauren and to pursue an extramarital sexual relationship with her.

50. Lauren was stunned and appalled by Jeff Lauder's proposition and repeated advances at the party.

51. While Lauren had previously believed Shannon Lauder had been engaged in an ongoing extramarital relationship, she was unaware that Jeff Lauder knew about the relationship and unaware Jeff had also engaged in an extramarital relationship Shannon knew about.

52. Lauren was unaware that the Lauders had an open marriage.

53. Lauren was unaware that Jeff had desired a sexual relationship with her for years.

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54. Lauren was shocked, disturbed, and extremely uncomfortable Jeff Lauder's admissions and his conduct toward her at the pool party and with the personal, private information he inappropriately expressed to her about the Lauders marital and extramarital relationships.

55. Lauren knew it was time for her to leave the party.

56. Before she left, Lauren notified several members of the Domestic Violence Unit in attendance that she was leaving because Jeff Lauder had made advances toward her.

57. Lauren was so appalled by Jeff Lauder's conduct and actions that she did not realize, at the time, that others at the party had observed Jeff's advances and actions toward her.

58. Members of the Domestic Violence Unit talked to Lauren about their observations and talked about "the horrified looks on [Lauren's] face," as Jeff was talking to her.

59. Lauren left the Lauders' home and walked to her car.

60. Jeff Lauder texted Lauren and asked if she had left the party.

61. As she got in her vehicle, Lauren received a phone call from Shannon Lauder telling her to get back inside and talk to her.

62. While Lauren did not consider Shannon Lauder's directives to come back and talk with her to be official, direct orders, technically, Lauren only went back to speak with Shannon Lauder because she held the rank of LMPD Major.

63. Lauren well-understood the authority Shannon Lauder held on LMPD, especially now that she had been promoted to Major, and did not want to upset her.

64. Lauren wanted to respect the newly appointed Major Lauder, and begrudgingly got out of her vehicle to speak with her.

65. Jeff Lauder met Lauren at the front door, and she immediately asked Jeff where Shannon was.

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66. Jeff directed her upstairs, where Lauren found Major Lauder sitting on a couch, highly intoxicated, and attempting to locate the aforementioned Sex Crimes Detective by phone.

67. Shannon told Lauren that Jeff informed her that he spoke to Lauren about “their arrangement.”

68. Shannon said that she wanted Lauren to know that she “had [her] blessing” to engage in a relationship with Jeff.

69. At that point, Jeff Lauder entered the room and Shannon Lauder quickly left to locate the aforementioned Sex Crimes Detective.

70. As soon as Shannon Lauder exited the room, Jeff Lauder immediately tried to kiss Lauren.

71. Lauren pushed Jeff Lauder away and quickly left the Lauder home.

72. The next morning, Lauren received multiple phone calls and text messages from other pool party guests about the events of the night before and the Lauders’ behavior.

73. Lauren learned that many people were talking about the pool party and that other guests overheard Jeff Lauder’s explanation of the arrangement he and Shannon Lauder had regarding sexual relationships outside their marriage.

74. Then, Lauren received a text message from Shannon Lauder stating that she and Jeff drank too much alcohol at the pool party and that she realized when she woke up that morning that she had “overshared.”

75. Shannon Lauder asked Lauren to keep between them the information she shared with her the night before.

76. Lauren wanted Shannon to understand that others already knew the Lauders’ personal business and that she was not the person responsible for telling it.

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77. Lauren informed Shannon Lauder that she was previously aware of her relationship with the aforementioned Sex Crimes Detective and that several others were also previously aware.

78. Lauren informed Shannon Lauder that others had seen her kissing the aforementioned Sex Crimes Detective openly at the party.

79. Lauren informed Shannon that others at the party heard Jeff tell her their extramarital, sexual relationship arrangement and his knowledge of her relationship with the aforementioned Sex Crimes Detective.

80. Lauren informed Shannon that others at the party heard Jeff's comments and observed his actions toward her.

81. In the days following the pool party, there were several phone calls and text messages between Lauren and Shannon Lauder.

82. Shannon expressed that she was horrified and embarrassed about what happened.

83. Shannon Lauder told Lauren that she was going to deny everything.

84. Shannon further stated that she and Jeff agreed to never talk about the situation with anyone.

85. Upon information and belief, Major Shannon Lauder immediately denied rumors about the aforementioned events to members of LMPD, including members under her command.

86. Upon information and belief, Major Shannon Lauder's denial resulted in the dissemination of blatantly false allegations that Lauren was spreading untrue rumors about the Lauders.

87. Very quickly, rumors about the pool party swirled around LMPD.

88. Members of the department, including superiors, frequently questioned Lauren about the rumors.

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89. Lauren was quickly labeled a “liar,” a “gossip,” and “dramatic.”

90. Some members of the LMPD suggested and even claimed that Lauren was a willing participant in the Lauders’ misconduct and that she enjoyed the Lauders’ attention, as well as the attention from the constant, continuous rumor mill.

91. Although the pool party story swept through out LMPD, from the top of command and throughout the rank and file, no superiors and no commanders took any steps to initiate an investigation into the rumors and allegations about the pool party, the Lauders’ harassment of Lauren, or Shannon Lauder’s ongoing relationship with a male subordinate, a detective under her command.

92. While Lauren was angry and disgusted by the Lauders’ conduct at the pool party and thereafter, as well as the seemingly unending rumor mill, she kept her head down, tried to ignore the gossip, and wanted only to move on and focus on her job.

93. Lauren also believed that reporting the Lauders’ harassment and the harassment she had since received from other members of the department would only negatively impact her career.

94. Shannon and Jeff Lauder were both well-connected throughout LMPD and held significant authority and power in their positions and personally.

95. Lauren did not want them to harbor worse feelings about her or hold a grudge against her.

96. Lauren believed that Shannon Lauder could significantly harm her career.

97. Further, Lauren was aware that many instances of sexual harassment and sexual misconduct were never punished or even acknowledge by LMPD.

98. Lauren believed reporting the Lauders was pointless, at best, if not potentially harmful.

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99. Time passed, and Lauren desperately tried to convince herself that her hard work on behalf of domestic violence victims would speak louder than the label and rumors that persisted.

100. By fall 2022, the Domestic Violence Unit had undergone significant cuts to officers and staff.

101. Domestic Violence Detectives were deeply struggling with increasing caseloads, the emotional weight many continued to feel from the 2020 protests in Louisville, and the general toll that domestic violence work takes on detectives even under the best circumstances.

102. Lauren reached out to an officer she knew who served on LMPD's peer support team and asked if the psychologist for the department would be available to come to their unit so that any detective who was struggling could meet with the psychologist one-on-one.

103. After speaking with Major Mindy Vance, the commander of the peer support team, the officer told Lauren that Major Vance would be contacting her to schedule a peer support team meeting first.

104. Under information and belief, it is widely understood among members of LMPD that there is a long-standing, bitter conflict between Major Mindy Vance and Major Shannon Lauder.

105. On October 5, 2022, the LMPD peer support team met with members of the Domestic Unit.

106. Under information and belief, despite clearly being told otherwise, Major Mindy Vance misinformed members of the peer support team that the purpose of the meeting was that "Lauren was finally ready to come out about the pool party."

107. Major Mindy Vance led the peer support meeting with the Domestic Violence Unit members.

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108. Under information and belief, from the outset of the meeting, Major Vance continuously implied the issues facing the Domestic Violence Unit stemmed from former leadership misconduct that occurred at the August 2020 Lauder pool party.

109. The concerns expressed by Major Vance and the peer support team continued for hours.

110. Finally, Lauren asked Major Vance and the peer support team to leave the room.

111. Lauren and the Domestic Violence Unit members agreed that their unit was deeply struggling with morale and many other issues that were wholly unrelated to the pool party.

112. Lauren decided to leave the office in hopes that if she removed herself from the meeting, Major Vance and the peer support team would begin to focus on the dire issues the unit and its members faced with regard to morale, unit cuts, increasing caseloads, and the emotional weight of their jobs.

113. After the meeting, Major Vance contacted Lauren to further discuss the events of the pool party with her.

114. Major Vance encouraged Lauren to disclose the Lauders' harassment and misconduct.

115. Lauren repeatedly pointed out that many members of command were aware of the harassment and misconduct and that it should not be incumbent upon her to report the Lauders.

116. Major Vance repeatedly complained that the Lauders get away with everything.

117. Upon information and belief, without Lauren's permission to do so, Major Mindy Vance contacted Major Nick Owen herself and said, "It's true!"

118. Major Mindy Vance told Lauren that she could directly report the Lauders harassment and misconduct to Major Nick Owen, who was the Commander of the PSU and the

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Public Integrity Unit ("PIU").

119. Major Mindy Vance contacted Lauren and told her that Major Nick Owen said for Lauren to contact him whenever she would like.

120. Major Mindy Vance called Lauren and told her that if anything was ever going to change in the Domestic Violence Unit, that the Lauders' harassment and misconduct must be addressed.

121. In the months following the peer support meeting, Major Mindy Vance repeatedly contacted Lauren to check on her and to encourage her to report the Lauders' misconduct.

122. Under information and belief, after Major Mindy Vance informed Major Nick Owen that the allegations of harassment and misconduct by the Lauders were true, he reported the allegations, and a PSU investigation was initiated.

123. Lauren gave two statements/interviews during the PSU investigation into the Lauders conduct.

124. Lauren fully cooperated and told PSU investigators the truth about the Lauders' misconduct and the harassment she suffered at their hands.

125. Under information and belief, after the PSU investigation into the Lauder's sexual harassment and misconduct against Lauren was initiated, a PSU investigation against Major Mindy Vancy was initiated alleging that Vance violated peer support confidentiality multiple times through her disclosure of protected information.

126. Under belief and information, Major Mindy Vance was exonerated of allegations that she improperly disclosed confidential information obtained through peer support.

127. LMPD Standard Operating Procedures define exoneration as: "The incident occurred as reported but was lawful or proper."

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128. During the pendency of the PSU investigation of the Lauders conduct, on March 7, 2023, River City Fraternal Order of Police, Lodge 614, Inc. ("FOP") filed a lawsuit against Louisville/Jefferson County Metropolitan Government acting through its Police Department alleging that LMPD violated the terms of its Collective Bargaining Agreement with the FOP by improperly initiating a PSU investigation based upon confidential and protected information obtained during the peer support process and refusing to cease said PSU investigation.

129. As previously provided, after Lauren scored highly on the sergeant's examination, she was promoted to the rank of sergeant in August 2023 and assigned to the Fifth (5th) Division of LMPD.

130. In 2023, LMPD posted a Sergeant position vacancy in the Domestic Violence Unit, and, shortly before Lauren was promoted to Sergeant, former Domestic Violence Detective, Sgt. Sarah Mantle was appointed to fill the position.

131. Thereafter, Lt. Andrew Meyer was appointed as the Commander of SVU, leaving an open position for a Sergeant in PSU.

132. Sgt. Sarah Mantle was later appointed to fill the PSU vacancy, once again, leaving the Domestic Violence Unit without one Sergeant position filled.

133. Lauren immediately expressed interest in the vacant Domestic Violence Sergeant position to commander Lt. Meyer.

134. Under belief and information, when Sgt. Sarah Mantle submitted her application for the Domestic Violence position, she was the only candidate that applied.

135. Under information and belief, when Lauren expressed her interest in the Domestic Violence Sergeant position to commander Lt. Meyer, other sergeants continued to have little if any interest in the unit and Lauren was a natural choice given her eight (8) years of experience as

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AM a Domestic Violence Detective.

136. When Lauren met with SVU Commander Lt. Meyer about a Domestic Violence Sergeant position, Lt. Meyer informed Lauren that the Lt. Colonel over SVU called Lauren “intense.”

137. The Domestic Violence Unit Sergeant position was later eliminated.

138. Upon information and belief, Lauren was recommended by PSU leadership for an appointment to an open position in PSU but Chief Jacquelyn Gwynn-Villaroel refused to select Lauren for the appointment.

139. Upon information and belief, Lauren was named to a list of Sergeants recommended for an LMPD training class that would good potential candidates Sergeant positions in PSU or PIU in the future.

140. Upon information and belief, Lauren was one of very few recommended candidates for the training that was denied by Chief Jacquelyn Gwynn-Villaroel.

141. In January 2023, Lauren interviewed for one (1) of two (2) vacant Sergeant positions in LMPD’s Recruitment and Selection Unit.

142. Following her interview and evaluation, Lauren was ranked number two on the selection list by Lt. Chris Watkins, the Commander over Recruitment and Selection.

143. Upon information and belief, when the list was presented to the LMPD Chief Villaroel, she appointed the first (1st) and third (3rd) candidates on the list to fill the Recruitment and Selection Sergeant positions.

144. FOP filed a grievance regarding Chief Villaroel’s decision to skip Lauren and appoint the lower scoring candidate.

145. Upon information and belief, Chief Villaroel denied the grievance and stated that

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her appointment was selected by seniority.

146. Upon information and belief, Lt. Chris Watkins rebutted the Chief's reasoning and Chief Villaroel was expressly informed that seniority and all other required factors were considered when the ranked list of candidates was compiled.

147. Upon information and belief, FOP argued to Chief Villaroel that the Collective Bargaining Agreement does not permit the Chief to rearrange the list of candidates but only allows the Chief to remove a candidate from the list for "just cause."

148. Specifically, upon information and belief, the Collective Bargaining Agreement provides: "The Unit Commander shall select the person to fill the vacancy by the top three candidates on the ranked list, subject to review of the Chief. The Chief may remove a candidate from the list for just cause."

149. Upon information and belief, Chief Villaroel refused to reverse her decision and refused appoint Lauren to the position.

150. Upon information and belief, Chief Villaroel did not state just cause to remove Lauren from the list.

151. Lauren realized that despite her desire to move on from the Lauders' harassment and misconduct, despite her desire to move on from Major Vance's attempts to exploit Lauren's victimization and to revictimize her, and despite her desperate attempts to ignore the continuous rumors and slanderous labels and focus on her work, her hard work had not and would not overcome the entirety of what she had endured beginning in August 2020.

152. Lauren realized that the last years would have been tremendously easier for her professionally if she had simply slept with Jeff Lauder in 2020.

153. In that moment, Lauren decided that she must stand up for herself and for other

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female officers who have endured or will endure sexual harassment and discrimination by LMPD and its members.

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154. On April 18, 2024, the Jefferson Court issued a temporary injunction that provided, in part, “LMPD is therefore temporarily enjoined from continuing or beginning anew any investigation or disciplinary proceeding that were initiated based on or resulted from information learned during peer support counseling sessions, including but not limited to [PSU] investigations...”

155. On May 15, 2024, Plaintiff, Lauren Carby, tendered her written Memorandum regarding the events related to the August 2020 pool party and the harassment she received by Major Shannon Lauder and now Lieutenant Jeff Lauder.

156. In her memorandum, Lauren explained that it was her understanding that the PSU investigation into the events that occurred during the pool party was no longer active and expressly stated, “Therefore, please accept this memorandum as my formal PSU complaint.”

157. At the time of this filing, Lauren has yet to be notified as to whether an internal investigation will be initiated based upon the contents of her formal complaint.

158. Lauren is not the only victim of harassment and discrimination perpetrated by members of LMPD and furthered by failures of LMPD to protect victims.

159. LMPD maintains a disturbing internal culture where pervasive patterns of harassment, sexual misconduct, predatory behaviors, and discrimination by its members have been repeatedly excused, ignored, concealed, fostered, and justified.

160. Page 69-70 of the Department of Justice’s Findings into LMPD, issued March 8, 2023, provides:

LMPD’s criminal and administrative investigations into reports of sexual misconduct and domestic violence by officers frequently

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deviate from Departmental policies and generally accepted investigative practices. We found numerous instances where LMPD did not open administrative investigations to correspond to criminal investigations into reports of sexual misconduct and domestic violence by officers. We also reviewed cases where administrative investigations occurred but did not address important allegations, such as reports that officers had tried to intimidate or retaliate against women for reporting sexual harassment or domestic violence. ... The units that conduct criminal and administrative investigations into LMPD officer misconduct promise “thorough” investigations, including interviewing victims, witnesses, and anyone else with relevant information. But we reviewed numerous cases where investigations failed to gather or seemed to disregard evidence such as testimony from outcry witnesses (the people who first heard about the sexual misconduct and domestic violence), other potential victims or witnesses, other related misconduct, or text or phone messages that may be stored on officers’ and victims’ phones, all of which could corroborate women’s accounts.

161. Upon information and belief, Brian Wilson was employed as an LMPD police officer and was under investigation by LMPD for allegations of other cyber-related sexual misconduct in 2020, when he harassed, cyber-stalked, hacked, and attempted to extort nude images from Jane Doe and approximately 26 other innocent women.

162. It was neither the first time Wilson’s sexual misconduct was brought to the attention of LMPD command staff, nor was it the first time LMPD delayed and prolonged the investigation of officers for sexual misconduct while the officers remained employed and actively working for the department.

163. In September 2019, a Jefferson County jury awarded a female LMPD Lieutenant \$1.2 million dollars in a sexual harassment lawsuit filed against LMPD following the department’s failure to implement prompt and appropriate corrective action after she reported to command staff that Lt. Rob Shadle sent her an unsolicited, unwelcome text message containing a photograph of his naked penis in 2016, the department’s attempts to dissuade her from filing an official report of

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Shadle's misconduct, and the department's failure to enforce orders to protect her from continued harassment.

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164. Upon information and belief, in 2018, during the pendency of the above litigation, former LMPD Chief Steve Conrad reversed his decision to terminate LMPD Officer Steven Pond for sending unwanted sexually explicit messages, including unsolicited photographs of his naked penis, to four (4) female coworkers and, instead, only issued Pond a brief suspension.

165. Upon information and belief, LMPD's entire homicide division fell under scrutiny following reports that members engaged in sexual activity with each other while on duty/on LMPD property.

166. Upon information and belief, former LMPD Chief Erika Shields blasted the department, confirming that she had to devote manpower to "running blacklights" throughout the division to determine whether there was evidence of semen in supervisors' offices – to see if the officers were having sex in the office.

167. Upon information and belief, former Chief Shields confirmed that certain units were notably unproductive because of rampant sexual affairs.

168. Upon information and belief, from 2017 through 2022, Louisville Metro Government spent over \$40 million dollars in civil litigation arising from the misconduct of LMPD officers.

169. Yet, neither the claims nor the massive damages have been sufficient catalyst for LMPD to make significant changes.

170. LMPD continues to tolerate sexual harassment, misconduct, and discrimination by its members, including sexual misconduct by its members against its members.

171. In light of LMPD's highly sexualized, misogynistic culture and its history of

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tolerance toward sexual misconduct, harassment, and discrimination, it is certainly reasonable and understandable that Lauren Carby initially wanted to simply move on from the acts perpetrated against her.

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172. Over these years of harassment and discrimination, Lauren has lost sleep and lost friends and colleagues.

173. She has felt pressured to constantly take sides in the war between the Lauders and Mindy Vance and repeatedly refused to do so.

174. She has consistently felt pressured to defend herself against the labels and allegations asserted against her by members of LMPD, from the top of command and throughout the rank and file.

175. She has experienced significant emotional distress, increased anxiety and paranoia, and emotional and physical exhaustion.

176. The events described herein have taken a great emotional toll on her family and her marriage.

177. Lauren, who always deeply longed to become a mother, suffered a miscarriage.

178. Lauren has suffered and paid a tremendous price for being victimized by Major Shannon Lauder, Major Jeff Lauder, Major Mindy Vance, and other members of LMPD who failed their duties to stop further harassment and discrimination and to report allegations misconduct perpetuated against her.

179. Lauren was and is the only victim in the disturbing and disgusting events that began years ago and continue today.

180. Accordingly, Lauren seeks the judicial recourse she is due for the injustice and harm perpetuated against her and for the injuries she sustained at the hands of LMPD superiors,

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commanders, and other members from within the thin blue line.

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COUNT I: KENTUCKY CIVIL RIGHTS ACT
SEX DISCRIMINATION & HOSTILE WORK ENVIRONMENT
KRS §344.010 et seq.

181. The Plaintiff incorporates by reference, as if set forth fully herein, every averment, allegation, and statement contained in the pervious paragraphs of this Complaint.

182. The Plaintiff, a female, is a member of a protected class.

183. As described herein, the Defendant violated the guarantees afforded to the Plaintiff under Kentucky Law and KRS 344.010, *et. seq.*

184. The Plaintiff was subjected to unwelcome harassment and sexual harassment on the job because of her protected class.

185. The Plaintiff was subjected to unwelcome derogatory comments, harassment, and other misconduct on the job because of her protected class.

186. The Plaintiff was and remains subject to discrimination regarding employment terms, conditions, and privileges because of her protected class.

187. LMPD created and subjected the Plaintiff to a workplace environment permeated with hostility, discrimination, discriminatory intimidation, ridicule, insult, and harassment.

188. The discrimination and harassment created a hostile and abusive work environment so severe and pervasive that Plaintiff, among other things, was frequently prevented from sleeping, feared losing her job, experienced increased anxiety, was demeaned and disparaged by coworkers and superiors.

189. Defendant LMPD and its members knew or should have known about the harassment and repeatedly failed to take action to protect Plaintiff.

190. Defendant is vicariously liable for the actions of its employees.

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191. As a direct and proximate result of the aforementioned conduct, Plaintiff has suffered emotional distress, embarrassment, humiliation, physical injury, physical pain and suffering, mental and emotional anguish, counseling and medical expenses, loss of past and future wages, employment benefits, and professional opportunities in an amount that exceeds the minimal jurisdictional limits of this Court.

COUNT II: KENTUCKY CIVIL RIGHTS ACT
RETALIATION AND CONSPIRACY TO RETALIATE
KRS §344.280

192. The Plaintiff incorporates by reference, as if set forth fully herein, every averment allegation or statement contained in the previous paragraphs of this Complaint.

193. The Plaintiff, Lauren Carby was, at all times relevant herein, employed by LMPD.

194. The Plaintiff engaged in a protected activity by declining unwanted sexual advances, reporting sexual harassment and misconduct, and participating in related internal investigations.

195. The Plaintiff engaged in a protected activity by reporting and/or participating in internal affairs investigations related to demeaning sex and/or gender related comments.

196. The Plaintiff reported allegations of sexual harassment and gender-based discrimination and inappropriate conduct and participated in internal affairs investigations related to said conduct of LMPD Major Shannon Lauder and LMPD Lieutenant Jeff Lauder.

197. The Plaintiff reported allegations of sexual harassment and gender-based discrimination and inappropriate conduct and participated in internal affairs investigations related to said conduct of LMPD Major Mindy Vince.

198. LMPD and its agents took action to punish the Plaintiff for enduring sexual harassment and gender discrimination at the hands of LMPD command staff members and for reporting harassment and discrimination and participating in internal affairs investigations regarding the conduct of the aforementioned LMPD command staff members.

Presiding Judge: HON. JULIE KAELEN (630451)

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199. Enduring sexual harassment and gender discrimination at the hands of aforementioned LMPD command staff members, reporting these allegations of conduct to superiors, and participating in internal investigations regarding said conduct have led to the actions taken by LMPD against Plaintiff Carby, including but not limited to altering the terms and conditions of her employment, disparate treatment, discrimination, demeaning comments, disparaging her professional and personal reputations, harassment, intimidation, and hostility against her.

200. LMPD and/or its members or agents subjected the Plaintiff to reprisal.

201. As a direct and proximate result of the aforementioned conduct, Plaintiff has suffered emotional distress, embarrassment, humiliation, physical injury, physical pain and suffering, mental and emotional anguish, counseling and medical expenses, loss of past and future wages, employment benefits, and professional opportunities in an amount that exceeds the minimal jurisdictional limits of this Court.

WHEREFORE, the Plaintiff, Lauren Carby, respectfully demands the following:

1. Judgment against the Defendant;
2. A trial by jury;
3. Compensatory damages;
4. Equitable relief;
5. Punitive damages in an amount sufficient to punish Defendant for its willful, wanton, oppressive, fraudulent, malicious, and grossly negligent conduct;
6. Costs expended in this matter, including but not limited to litigation costs and expenses and reasonable attorneys' fees plus pre and post judgment interest; and

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7. Any and all other relief to which she may be properly entitled, including
but not limited to the right to amend this Complaint.

WLKY

Respectfully Submitted,

SAM AGUIAR INJURY LAWYERS, PLLC

/s/ Sara E. Collins

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Counsel for Plaintiff, Lauren Carby

Presiding Judge: HON. JULIE KAE LIN (630451)

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