

NOT ORIGINAL

DOCUMENT

PM

CASE NO. _____

06/18/2024 02:50:48

JEFFERSON CIRCUIT COURT

DIVISION _____ ~~WLKY~~

JUDGE _____

ELECTRONICALLY FILED

CHRISTINE SILK

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, Christine Silk, 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 Christine Silk ("Christine") 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, Dale Cottongim ("Cottongim") was an employee of LMPD.
5. At all times relevant herein, Justin LeMon ("LeMon") was an employee of LMPD.

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

JURISDICTION & VENUE

6. 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.

7. Venue is proper in the Jefferson Circuit Court because the actions giving rise to this complaint occurred in Jefferson County, Kentucky.

FACTUAL BACKGROUND

8. Plaintiff, Christine Silk, is a police officer, an Army veteran and the mother of a two-year old son.

9. As a police recruit, she began her law enforcement training at the LMPD Police Academy ("Academy") on or about February 19, 2023.

10. One of her instructors in the Academy was Officer Dale Cottongim.

11. Within her first week in the Academy, Officer Cottongim began making inappropriate comments to Christine and those comments continued while he remained in the training division.

12. In front of her Academy classmates, Cottongim asked Christine if she "had a one-night stand to have your son? Is that why the kid doesn't have a father?"

13. In front of her classmates, he told her that statistically boys who grow up without fathers "do not grow up well" and are more likely to commit crimes than boys who grow up with fathers in their lives.

14. When Plaintiff struggled to find childcare for an extra duty detail assignment, directing traffic for the Pegasus Parade, she asked officer Cottongim for help regarding what to do

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

about her childcare and the extra duty detail.

15. In front of her classmates, Cottongim suggested that Christine “whore herself out for childcare” and specifically detailed that she should “go on a date, take a guy home, sleep with him, and then [she] would have childcare.”

16. These are only a few of the inappropriate statements Cottongim made to Christine while he was her training instructor.

17. Despite his degrading comments and discriminatory comments, Cottongim occasionally texted Christine at night to see how she was doing and suggested Christine and other recruits friend him on Facebook.

18. Initially, she believed that his texts in the evening were an attempt to smooth things over after treating her badly in class.

19. At first, Christine did not consider Cottongim’s statements in class as sexual harassment but believed they were inappropriate, sexist, degrading, and discriminatory based upon her sex/gender and status as a single mother.

20. Christine was emotionally distressed by Cottongim’s conduct and, in tears, reported his conduct to Training Sergeant Amanda Seelye.

21. Sgt. Seelye immediately told Christine that Cottongim’s statements and conduct were unacceptable and reported his conduct up the chain of command, resulting in a Professional Standards Unit (“PSU”) investigation against Cottongim on allegations of Conduct Unbecoming, Harassment/Sexual Harassment, and Courtesy Violation.

22. Findings against Cottongim were sustained for violations of LMPD policy regarding Conduct Unbecoming and Courtesy.

23. Cottongim was exonerated on the charge of Harassment/Sexual Harassment.

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

24. He received a letter of reprimand and was involuntarily transferred from the LMPD training division to a patrol division.

WLKY

25. Cottongim did not receive a suspension or reduction of pay or benefits.

26. Upon information and belief, no orders were issued by LMPD to prevent Cottongim from being assigned to the same detail as Christine, from being in the same vicinity as Christine while on the job, or from making derogatory or degrading statements about Christine.

27. Upon information and belief, within weeks of this filing, Cottongim made an implicit, derogatory reference to Christine on an LMPD member private social media page.

28. Christine participated in the PSU investigation that was initiated after Sgt. Seelye reported Cottongim's conduct toward Christine.

29. Upon information and belief, PSU investigators interviewed Officer Cottongim prior to interviewing Christine.

30. Upon information and belief, PSU investigators inappropriately questioned Christine.

31. Christine believes the manner in which she was questioned by investigators was negative, demeaning, and seemed to indicate or assume that she had done something wrong.

32. After she participated in the investigation and after Cottongim was involuntarily reassigned, Christine received a lot of "backlash" from her classmates and coworkers.

33. Christine heard and heard of frequent comments encouraging others to avoid Christine and claims that she reports everyone for sexual harassment.

34. Christine felt negatively judged and ostracized by her coworkers and many on the department she had yet to even meet.

35. Upon information and belief, word spread quickly around LMPD that Christine

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000004 of 000023

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

was a troublemaker.

36. She worried that prejudice and bias against her would impact the willingness of others to work with and support her on the job.

37. At the end of her academy training, Christine developed pneumonia and was not cleared by her physician to complete the final fitness test.

38. Although she had completed every other task and assignment, she was not permitted to graduate on the same day as her academy class.

39. Christine was later cleared to take the final fitness test, passed, and was sworn-in as an LMPD officer on September 8, 2023.

40. New police officers complete three (3) training phases with Field Training Officers ("FTO") before they are permitted to work on their own, "Phase A," "Phase B," and "Phase C."

41. During her Phase A training, Christine was assigned Officer Reed Baegley as her FTO in the Sixth (6th) Patrol Division of LMPD.

42. For Phases B and C, she was assigned to the third (3rd) Patrol Division of LMPD, which would become her permanent patrol division.

43. Officer Justin LeMon was her assigned FTO for Phase B.

44. Shortly after she began Phase B, Officer LeMon began making inappropriate comments and advances toward Christine that made her uncomfortable.

45. LeMon repeatedly asked Christine if she would be interested in him romantically, if he were not married.

46. LeMon also asked what it would take before she would be interested in him sexually or romantically.

47. She continuously told him "No," and clearly stated that she wanted to keep their

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM relationship only professional.

48. LeMon complained frequently about his marriage and told Christine he was experiencing marital strife due to the amount of money he had spent on “Only Fans,” a premium subscription website with sexual content.

49. LeMon frequently touched Christine’s arm while riding in his police car.

50. Christine was uncomfortable when he touched her.

51. One day during her Phase B training, Christine became hot and sweaty and removed her bullet proof vest, which she wore over a shirt, and placed the vest on the floor of the car.

52. LeMon said that he did not know Christine “had abs” and brushed against her lower breast as he attempted to raise her shirt.

53. Christine smacked his hand away.

54. Once, while she was driving his police car, LeMon asked Christine to read a sexual fantasy he had written about her on the note section of his phone.

55. When Christine repeatedly refused to read the note, LeMon held the phone next to her face as she was still driving.

56. The sexual fantasy he had written described different sexual acts that he wanted to perform on Christine.

57. On or about the last day of her Phase B training, LeMon tried to hug Christine, told her the hug gave him an erection, and repeatedly insisted she look at his crotch.

58. Christine repeatedly refused to look at his erection.

59. She got in the driver’s seat of her personal vehicle and attempted to shut the door.

60. LeMon held her driver’s side door open as she repeatedly attempted to shut the door, continuously insisting she look at his erect penis through his pants.

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

61. She repeatedly refused and continued to try to close the door, explaining she had to pick up her son. Eventually, she was able to shut the door and drive off.

WLKY

62. Toward the end of Christine's Phase B training, Officer LeMon brought up the subject of nude pictures to her.

63. She expressly told him that she does not send nude pictures and would never consider doing so unless she was in a serious, long-term relationship with someone she trusted.

64. Christine continuously told LeMon that she did not want any time of sexual interaction or sexual/romantic relationship with him.

65. Throughout her Phase B training, Christine experienced significant emotional distress and anxiety.

66. She dreaded riding in a car alone with LeMon and dreaded simply dealing with him.

67. Christine consistently declined all his advances and tried to brush off his comments and actions, change the subject, and focus on the job in effort not to fail Phase B.

68. She unsuccessfully tried to ignore his conduct and move on.

69. On November 18-19, 2023, Lemon sent Christine multiple sexual text messages, which included a downward facing photo LeMon texted of his naked penis with his pants and underwear around his ankles.

70. Screenshots of the text messages are below, with a black box redaction over the picture LeMon texted of his naked penis:

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000007 of 000023

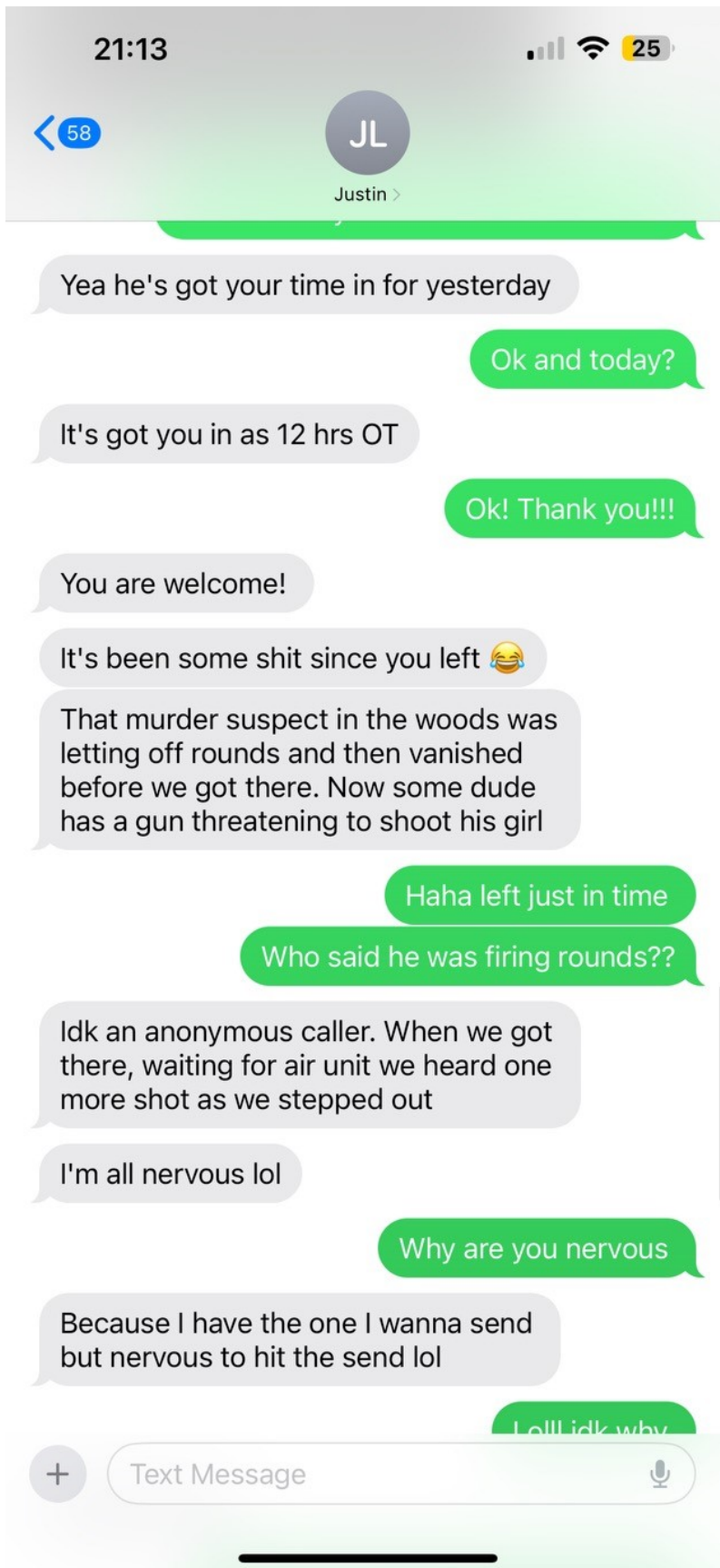
NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM



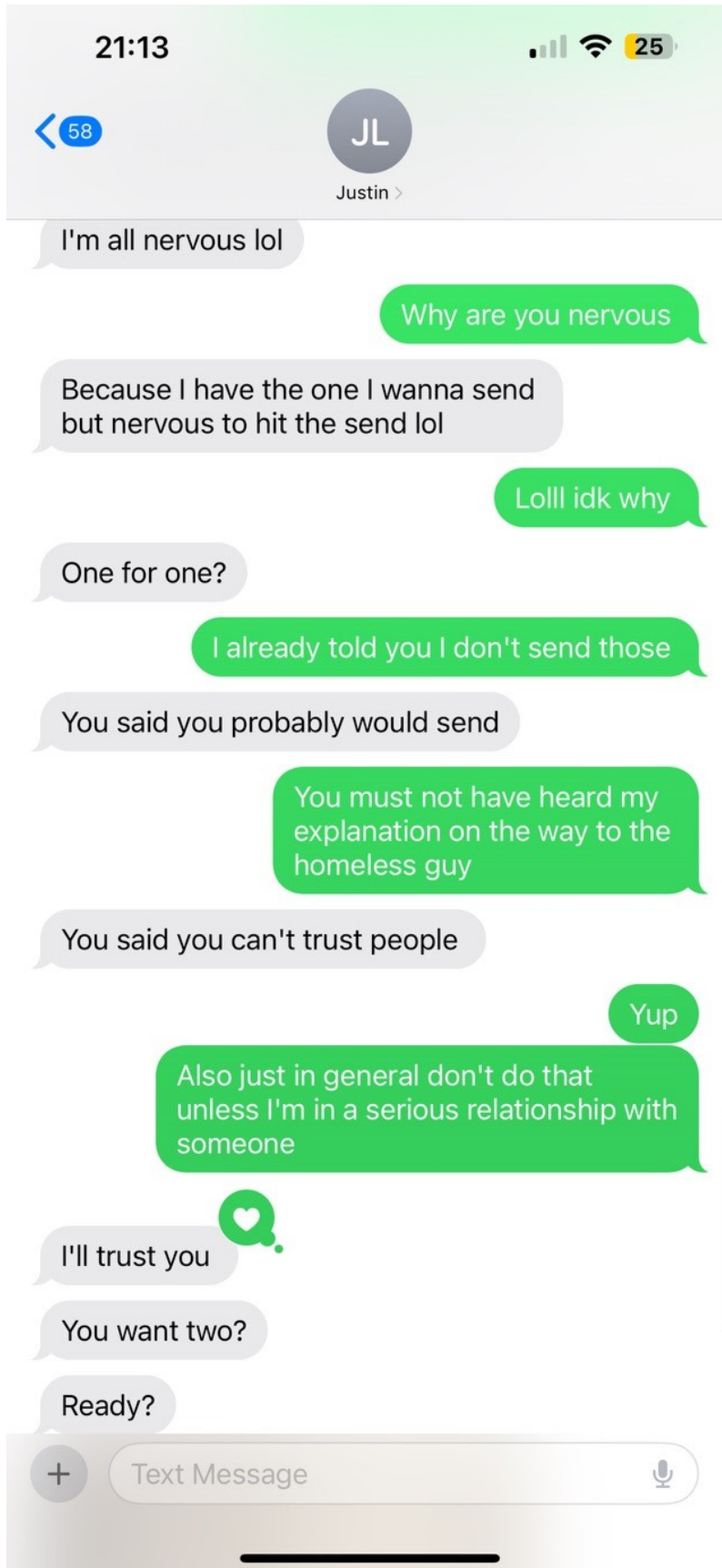
NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM



NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM



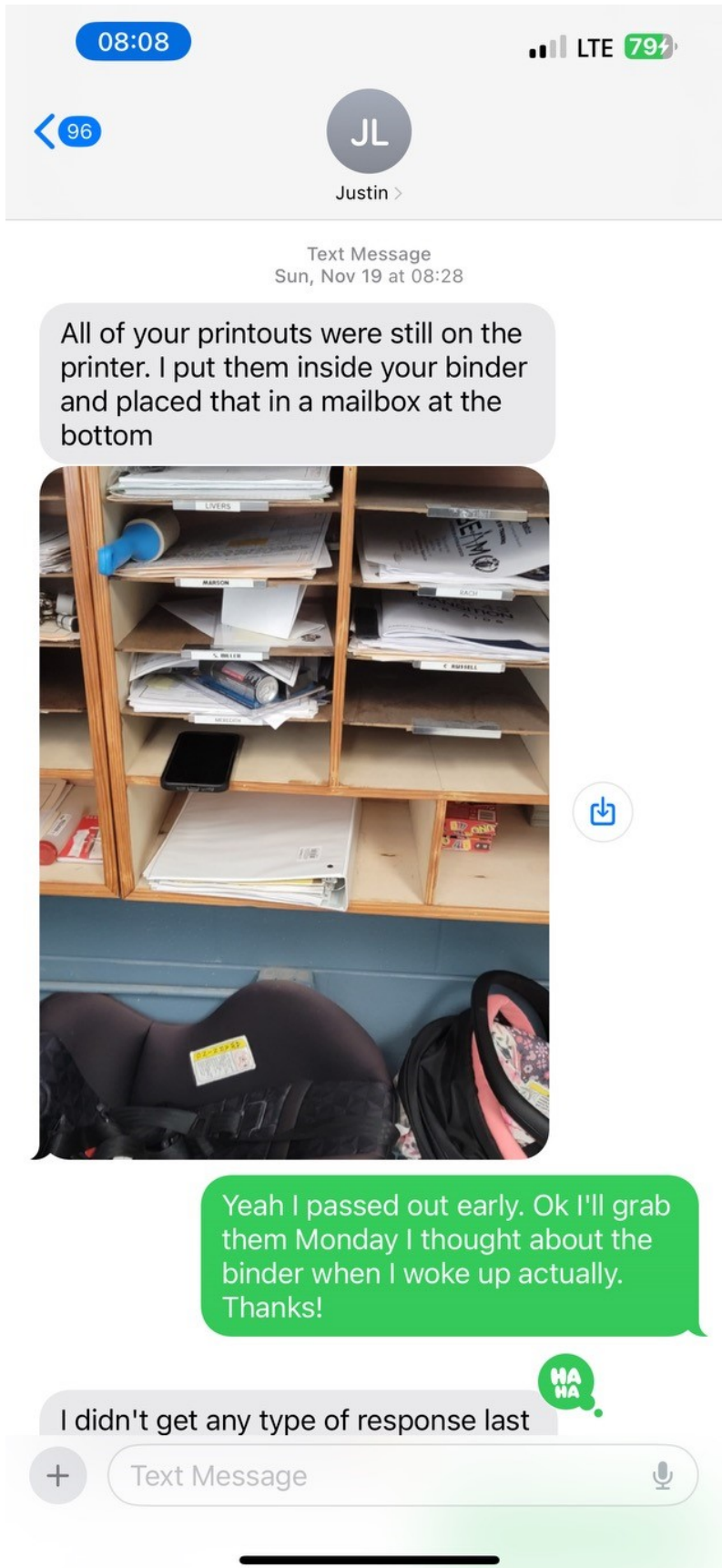
NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM



Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000011 of 000023

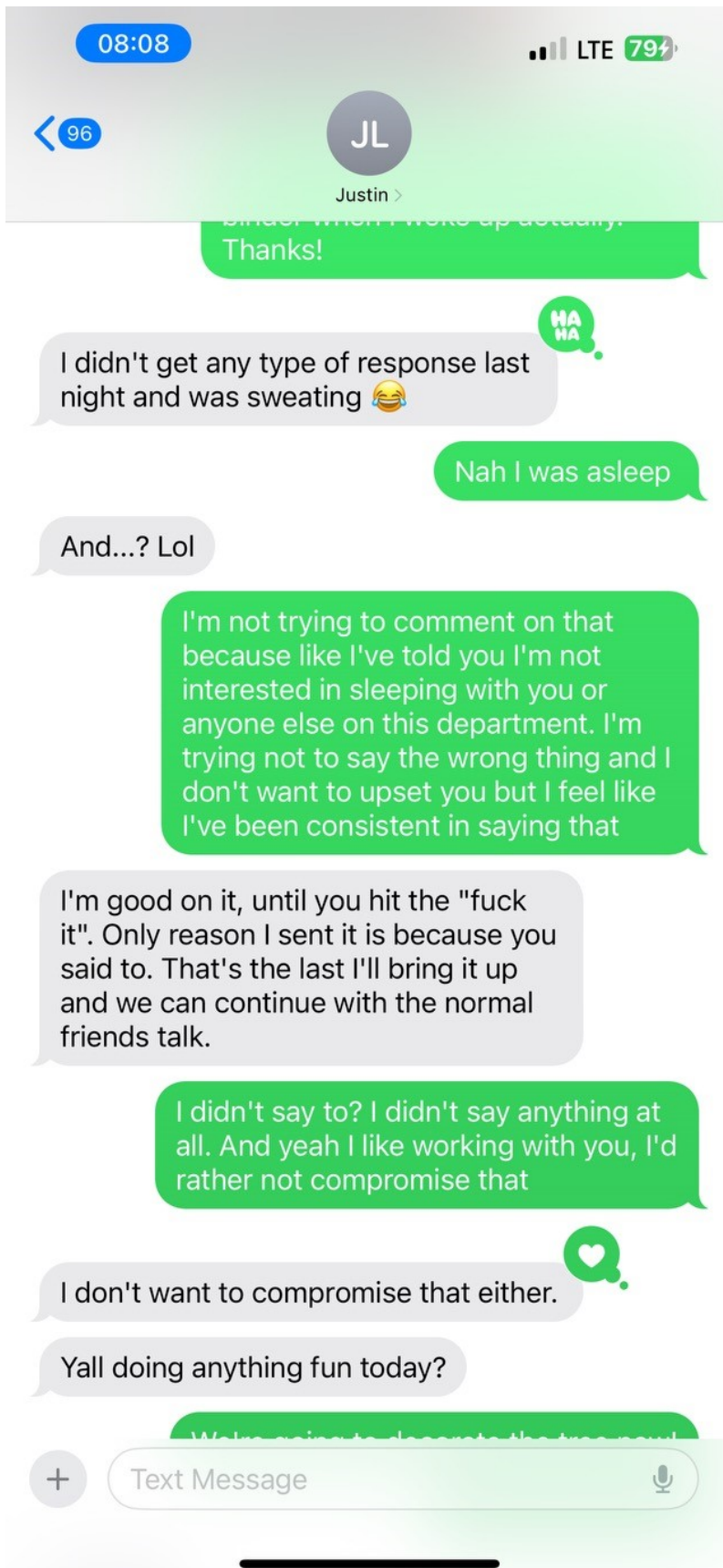
NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM



Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000012 of 000023

NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM



Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000013 of 000023

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

71. After the way she was treated by PSU and members of LMPD following her report of Cottongim's conduct, the last thing she wanted to do was report another male officer for inappropriate conduct.

72. However, Christine knew LeMon's conduct was wrong and worried he would do the same thing with other trainees or more members of the community.

73. Throughout her training with Officer LeMon, she was worried that her continuous declines to his advances would negatively impact her performance reports.

74. Within days of completing her Phase B training, Christine sought medical treatment for stomach and digestion related issues and was diagnosed with ulcers.

75. Christine had no prior history of gastrointestinal issues or ulcers.

76. After beginning her Phase C training with TFO Grant Combs, Christine was relieved to find Combs easy to talk to and very professional.

77. Eventually, she confided in Officer Combs that Officer LeMon was inappropriate with her and inappropriate with civilians.

78. Christine asked Combs to make sure LeMon is never assigned as the TFO to another female officer.

79. On December 12, 2023, Officer Grant Combs, sent a written memorandum to Sergeant Tony Doninger regarding Officer LeMon's inappropriate behavior, incompetence, and Christine's concerns that he should not be assigned as a TFO to female officers.

80. In the memorandum, Officer Combs also stated,

Officer Silk stated that she had been subjected to several situations where Officer LeMon made Officer Silk uncomfortable. Officer LeMon allegedly behaved in a manner that officer Silk would describe as "inappropriate." She also stated that Officer LeMon would exhibit this same behavior while on calls for service, reportedly skirting the line of "conduct unbecoming" while

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000014 of 000023

NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM

interacting with female citizens. Officer Silk expressed that she was apprehensive to tell anyone due to her dealing with an incident regarding an instructor during her time as a recruit, and she was afraid that she would be treated negatively for trying to do what she considered to be the right thing. ... Officer LeMon has also been accused of starting several rumors in the 3rd Division, some of which include Officer Silk. One in particular was allegedly which Officer LeMon told several officers that Officer Silk had an intimate relationship with an officer on squad 4, which was found to be untrue. ... Several officers in the division, squad 4 in particular will attest to, and surely have stories of their own regarding this matter.

81. No action was taken by LMPD command after Officer Combs sent the memorandum to Sgt. Doninger.

82. Afterward, the rumors around LMPD about Christine only intensified.

83. Christine became frustrated with the complete lack of attention to Officer Comb's report of misconduct by LeMon and became increasingly worried that he would continue this pattern of conduct with other female officers and women in the community.

84. Christine was informed by Officer Rodriquez that LeMon spoke negatively of her work.

85. Christine also increasingly heard false rumors that she was involved in sexual relationships with multiple officers.

86. When she completed her training phases, Christine requested to be placed on squad 4 for childcare purposes.

87. She was informed by Sgt. Dury that due to a rumor that she was in a sexual relationship with someone on squad 4, she would not be assigned to the squad.

88. On April 12, 2024, Christine sent a Memorandum to Major Donald Boeckman specifically detailing some specific instances of Officer LeMon's misconduct towards her and civilians.

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000015 of 000023

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

89. Thereafter, a PSU investigation was initiated against LeMon.

90. When she was interviewed, Christine, once again, the investigators questioning made her uncomfortable and seemed to be targeted more toward her actions than those of LeMon.

91. Upon initiation of the PSU investigation, LeMon was placed on emergency suspension and Christine was told she would be notified if and when he was placed on administrative reassignment.

92. Upon information and belief, almost immediately upon being emergency suspended, LeMon was assigned to the TRU/Records Unit, a unit with which officers such Christine are in regular, frequent contact.

93. Many weeks have passed without any member of LMPD contacting Christine to inform her that LeMon was placed on administrative reassignment, much less the location of his reassignment.

94. Neither LMPD nor its members have taken any steps to prevent LeMon from coming in contact with Christine.

95. Upon information and belief, nothing prevents Christine from unknowingly attending the same training class as LeMon or going to the firearms range at the same time.

96. In fact, when Christine went to PSU to give a statement regarding an officer involved shooting, she noticed that Officer LeMon was signed the PSU sign-in sheet shortly before she her interview was scheduled.

97. The PSU investigation of LeMon's misconduct was well underway at the time and the unit was well-aware Christine should not be forced to be in LeMon's presence or vicinity.

98. Upon information and belief, Officer LeMon knows where Christine lives.

99. Worried about the safety of her young son and herself, Christine requested

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

information regarding the make, model, and year of Officer LeMon's personal vehicle so that she could keep an eye out in the event his car is seen near her home.

WLKY

100. Her request for LeMon's vehicle information was denied.

101. Since Christine filed her memorandum and the PSU investigation against Officer LeMon was initiated, the backlash against Christine by members of the department has been significantly worse.

102. Upon information and belief, one day during roll call in the third (3rd) division, Christine's regularly assigned division, officers talked about making "Free LeMon" t-shirts, in reference to his administrative reassignment.

103. Upon information and belief, police officers from other divisions and police officers from other departments have been told to stay away from Christine because she has filed "three to four" sexual harassment complaints already, while she is still on probation, and "will report officers for anything."

104. Christine has heard, and fears, she will lose her job over reporting these instances of misconduct.

105. On May 11, 2024, Christine was placed on routine administrative reassignment following an officer involved shooting.

106. Officers on administrative reassignment following shootings often request to be temporarily assigned or "TDY" to specialty units, like homicide or robbery, so they can use the time to gain additional experience and skills.

107. Christine was told that her request to be temporarily assigned to homicide was denied due to there not being enough work for TDY placements given the confidential nature of the work.

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000017 of 000023

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

108. Officer Ben Derby, who shot a 17-year-old suspect in the top of the head days after Christine's officer involved shooting, was temporarily assigned to the homicide unit after.

WLKY

109. After she was declined for reassignment in the homicide unit, Christine requested to be reassigned to the mounted patrol unit and her request was declined

110. Then, Christine requested to be reassigned to the traffic unit and was declined.

111. Upon information and belief, the traffic unit rarely, and perhaps never, declines officer TDY requests.

112. Christine is emotionally exhausted, continues to suffer increased anxiety and fear in her home, and continues to experience physical manifestations from the incidents of harassment and backlash that she has suffered.

113. Upon information and belief, LMPD and its members have taken no action to protect Christine from Justin LeMon or Dale Cottongim.

114. Christine is not the only victim of harassment and discrimination to suffer by the actions and failures of LMPD.

115. LMPD maintains a disturbing internal culture where pervasive patterns of sexual misconduct and predatory behaviors of officers have been repeatedly excused, ignored, concealed, and fostered.

116. 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 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,

NOT ORIGINAL

06/18/2024 02:50:48

WLKY

DOCUMENT

PM

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.

117. Cyber and technology related misconduct has been a frequent issue, in recent years, among LMPD officers. 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.

118. 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.

119. LMPD has faced numerous instances of officer misconduct by officers texting female members of LMPD unwelcome, and unsolicited sexually explicit photographs of their nude penises.

120. 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 unwelcomed text message containing a photograph of his penis in

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000019 of 000023

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

2016, the department's attempts to dissuade her from filing an official report of Shadle's misconduct, and the department's failure to enforce orders to protect her from continued harassment.

121. Upon information and belief, in 2018, during the pendency of the above litigation, Defendant Conrad reversed his decision to terminate LMPD Officer Steven Pond for sending unwanted sexually explicit messages to four female coworkers and, instead, issued Pond a suspension.

122. Upon information and belief, LMPD Officer Steve Pond is a coworker and friend of Officer Justin LeMon.

123. 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.

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

125. LMPD continues to tolerate sexual misconduct by its members, including sexual misconduct by its members against its members.

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

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

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

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

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

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

WLKY

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

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

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

133. 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, feared for her safety, experienced increased anxiety, was verbally demeaned by coworkers and superiors, and verbally demeaned in front of coworkers.

134. Defendant knew or should have known about the harassment and failed to take action to protect Plaintiff.

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

136. As a direct and proximate result of the aforementioned conduct, Plaintiff has suffered emotional distress, embarrassment, fear, humiliation, physical pain, mental 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

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

138. The Plaintiff, Christine Silk was, at all times relevant herein, employed by LMPD.

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

139. The Plaintiff engaged in a protected activity by declining unwanted sexual advances and reporting sexual harassment.

WLKY

140. The Plaintiff engaged in a protected activity by reporting demeaning sex and/or gender related comments.

141. The Plaintiff reported allegations of sexual harassment and gender-based discrimination and inappropriate conduct by LMPD Officer Dale Cottongim.

142. The Plaintiff reported to a superior and filed a memorandum regarding allegations of sexual harassment and inappropriate conduct by LMPD Officer Justin LeMon.

143. LMPD and its agents took action to punish the Plaintiff for reporting and filing the memorandum regarding LMPD Officer LeMon's conduct.

144. LMPD and its agents took action to punish the Plaintiff for reporting and filing the memorandum regarding LMPD Officer Dale Cottongim's conduct.

145. LMPD and its agents retaliated and discriminated against the Plaintiff because she reported Cottongim's conduct to a superior and participated in a subsequent investigation of said conduct.

146. LMPD and its agents retaliated and discriminated against the Plaintiff because she reported LeMon's conduct to a superior, filed a memorandum regarding his conduct, and participated in a subsequent investigation of said conduct.

147. Reporting these allegations of conduct to superiors, filing the written memorandum, and participating in subsequent investigations regarding inappropriate conduct contributed to the actions taken by LMPD against Plaintiff Silk, including but not limited to altering the terms and conditions of her employment, disparate treatment, discrimination, harassment, intimidation, and hostility against her.

Presiding Judge: HON. TRACY E. DAVIS (630452)

COM : 000022 of 000023

NOT ORIGINAL

DOCUMENT

06/18/2024 02:50:48

PM

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

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

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

Respectfully Submitted,

SAM AGUIAR INJURY LAWYERS, PLLC

/s/ Sara E. Collins

Sara E. Collins

1900 Plantside Drive

Louisville, KY 40299

Telephone: (502) 888-8888

Facsimile: (502) 491-3946

scollins@kylawoffice.com

Counsel for Plaintiff, Christine Silk