



## FACTUAL ALLEGATIONS

5. Hillman began working for Employer on March 15, 2016
6. During her employment, Hillman and other female employees began to be sexually harassed, groped, and sexually assaulted by Stafford.
7. Stafford was the top supervisor over Employer.
8. Stafford would make sexually inappropriate comments to Hillman and other female employees.
9. In addition, Stafford would grab Hillman and other female employee's breast and attempt to grab the employee's crotch area.
10. Stafford's actions were humiliating, embarrassing, and demeaning to Hillman and other female employees.
11. Hillman and other employees would attempt to redirect Stafford's conduct, move his hands, and step away from Stafford, but Stafford would simply move closer to Hillman and other employees.
12. Stafford would put his hand under female employee's shirts and attempt to put his hands down their pants as well.
13. Stafford also requested that Hillman come to his home and that Stafford would provide Hillman with "good money" for coming to Stafford's home to "play." Hillman refused to go home with Stafford.
14. Hillman would complain to managers, co-workers and Stafford's family members about how she and the other female employees were treated, but Hillman was told that there was nothing anyone could do because Stafford was the "boss" and the other employees did not want to risk losing their jobs by attempting to intervene.

15. Other employees and managers taunted and harassed Hillman because of her complaints regarding Stafford.
16. Hillman could not afford to quit her job because she was a single mother. Hillman was living in a house Hillman rented from Employer, and Hillman financed her vehicle through Employer.
17. Hillman continued to complain to managers, family, and other staff and was told that Stafford was tired of Hillman “snitching on him.” Hillman became concerned for her job security when she became aware that Stafford was aware of her complaints regarding his conduct.
18. Shortly after being told that Stafford was tired of Hillman “snitching” on him, Hillman was fired after refusing to allow Stafford to stick his hand down her shirt.

**MALICIOUS/TORTIOUS INTERFERENCE WITH EMPLOYMENT - STAFFORD**

19. Hillman hereby adopts all previously stated paragraphs as though fully restated herein.
20. Defendant Stafford, with malice and unlawful intent, caused Hillman’s employment with Employer to be terminated.
21. Hillman was complaining about harassment and discrimination, and refusing to be sexually assaulted by Stafford.
22. Stafford’s actions were (1) intentional and willful; (2) were calculated to cause damage to Hillman; (3) were done with the unlawful purpose of causing damage and loss, without right or justifiable cause; and (4) resulted in actual damage and loss to Hillman.

**TERMINATION IN VIOLATION OF PUBLIC POLICY - EMPLOYER**

23. Hillman hereby adopts all previously stated paragraphs as though fully restated herein.

24. Hillman was terminated because of reporting the criminal acts of Stafford to her supervisors, which constitutes a violation of public policy consistent with *McArn*.
25. Hillman was complaining about continued sexual assaults by Stafford on female employees, and Hillman was terminated as a result of her complaints.

**OTHER CAUSES OF ACTION – ALL DEFENDANTS**

26. Hillman hereby adopts all previously stated paragraphs as though fully restated herein.
27. The actions and omissions of the Defendants as complained of herein also constitute the torts of negligence, gross negligence, negligent supervision, negligent and intentional infliction of emotional distress.
28. Defendants' actions are outrageous such that punitive damages should be imposed.

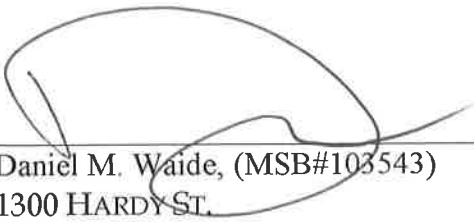
**DAMAGES**

29. Hillman hereby adopts all previously stated paragraphs as though fully restated herein.
30. As a proximate and direct result of the Defendants' actions, Hillman demands a judgment against Defendants for actual, compensatory, consequential, punitive and special damages including loss of wages, costs, pre and post judgment interest, and attorney's fees.
31. Hillman has suffered stress, anxiety, emotional distress, and loss of her good name as a result of the Defendants' actions.

WHEREFORE, PREMISES CONSIDERED, Hillman demands a jury trial and a judgment against Defendants for the damages complained of herein to be determined by a jury of Hillman's peers.

Respectfully submitted, this the 10<sup>th</sup> day of May, 2017.

TABITHA HILLMAN,  
Plaintiff



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