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INDIANAPOLIS DIVISION
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SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

Renee Larr,)
)
 Plaintiff,)
)
 v.)
)
 ChaCha Search, Inc.)
)
 Defendant.)

CAUSE NO:

1 : 14 -cv- 0503 RLY -MJD

COMPLAINT AND DEMAND FOR JURY TRIAL

I. STATEMENT OF THE CASE

1. Plaintiff, Renee Larr (hereinafter “Larr” or “Plaintiff”), brings her Complaint against Defendant, ChaCha Search, Inc. (hereinafter “ChaCha”), for its violations of Title VII of the Civil Rights Act of 1964 (“Title VII”), as amended, 42 U.S.C. § 2000e *et seq.* Larr contends she was subjected to a sexually hostile work environment and sexual harassment.

II. PARTIES

2. Larr is a female who resides within the geographical boundaries of the Southern District of Indiana.

3. ChaCha is physically located and conducts business within the geographical boundaries of the Southern District of Indiana.

III. JURISDICTION AND VENUE

4. Larr was an “employee” within the meaning of 42 U.S.C. § 2000e(f).

5. ChaCha is an “employer” within the meaning of 42 U.S.C. § 2000e(b).

6. Larr satisfied her obligation to exhaust her administrative remedies by having timely filed U.S. Equal Employment Opportunity Commission Charge Number 470-2013-03360 against ChaCha alleging discrimination in violation of the Civil Rights Act of 1964, as amended, because of her sex, female, in that she was subjected to sexual harassment and a hostile work environment. Larr received her Notice of Right to Sue from the EEOC and hereby timely files this lawsuit.

7. Jurisdiction is conferred on this Court by Title VII of the Civil Rights Act of 1964; 42 U.S.C. § 2000e-5, 28 U.S.C. § 1331, and 28 U.S.C. § 1343.

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 as all events, transactions and occurrences concerning this matter have arisen in the geographical purview of the Southern District of Indiana.

IV. FACTUAL ALLEGATIONS

9. The Chief Executive Officer of ChaCha is Scott Jones.

10. Scott Jones is married to Vee Lee a/k/a Vee Jones (hereafter “Vee Jones”).

11. Vee Jones was employed with ChaCha.

12. Vee Jones' responsibilities included promoting ChaCha by developing followers on Twitter and other social networking applications.

13. On February 8, 2012, Scott Jones filed for a Verified Emergency Petition for a Temporary Restraining Order against Vee Jones.

14. In his Petition, Scott Jones alleged that Vee Jones had engaged in behavior causing reasonable concern that unless restrained, she may cause irreparable harm to his personal and business reputation and requested a restraining order against Vee Jones "prohibiting her from using any business social accounts; including but not limited to; Twitter, Facebook, ChaCha etc., which may cause libelous damage to his personal and business reputation."

15. Scott Jones and Vee Jones later resolved their differences prior to October 10, 2012.

16. Vee Jones ceased her employment with ChaCha, but remained married to Scott Jones.

17. On or about October 10, 2012, ChaCha hired Renee Larr.

18. At some time before July 16, 2013, Vee Jones erroneously concluded Scott Jones was having an adulterous affair with Larr and made her conclusion known to Scott Jones.

19. Vee Jones' conclusion was unfounded, inaccurate, and incorrect.

20. During this time period, Vee Jones maintained a Twitter account "@VeeVee" with over 50,000 followers.

21. Upon information and belief, many of the followers were individuals who had begun following Vee Jones while she was employed with ChaCha.

22. On July 16, 2013, Vee Jones began posting items on Twitter relating to her erroneous conclusion that her husband, Scott Jones, was cheating on her with a ChaCha employee.

23. On or before July 16, 2013, Scott Jones became aware that Vee Jones had erroneously concluded that Scott Jones was having an affair with Larr, but neither Scott Jones, nor ChaCha informed Larr.

24. On July 17, 2013, at approximately 12:27 a.m. Vee Jones sent an email to Larr, Julie Pinkins (an individual who works for Scott Jones and part time at ChaCha) and Trent Vance (an individual who works for Scott Jones) saying, "When Scott's whore enters ChaCha, could you please e-mail me."

25. Larr was not informed about the background surrounding Vee Jones' erroneous conclusion or what was meant by the e-mail.

26. On July, 17, 2013, Larr went to work at ChaCha.

27. ChaCha controlled the environment in which Larr worked and had the ability to alter Larr's working conditions.

28. When Larr arrived at work she spoke with the Director of Human Resources, Stephanie Bishop about Vee Jones' suspicion that Scott Jones was having an affair with an employee of ChaCha.

29. Stephanie Bishop did not inform Larr that Vee Jones had singled out Larr as the ChaCha employee whom Vee Jones suspected Scott Jones was conducting an affair.

30. Similarly, no one at ChaCha told Larr to take the day off nor suggested she accept a leave of absence.

31. At some point that day, Stephanie Bishop had a telephone call with Scott Jones regarding Vee Jones' Twitter postings and Vee Jones interrupted the call and was verbally abusive.

32. Later on July 17, 2013, Stephanie Bishop then spoke again with Larr.

33. During this conversation, Stephanie Bishop informed Larr that Larr was the ChaCha employee that Vee Jones had selected as the individual having an affair with Scott Jones.

34. Larr was informed that the doors to ChaCha would be locked.

35. Larr was informed that Vee Jones would not be allowed entrance to the premises.

36. Larr was not instructed to take the day off or asked to take a leave of absence.

37. Scott Jones did not come to ChaCha.

38. Similarly, as CEO, Scott Jones did not issue any directives as to what ChaCha employees should do if Vee Jones, his wife, attempted to gain entrance to the premises.

39. On the afternoon of July 17, 2013, Vee Jones came to ChaCha and entered the business unbeknownst to Larr.

40. Indeed, Larr encountered Vee Jones sitting at Larr's workspace, which was visible to approximately 13-15 other employees in the office.

41. Vee Jones began shouting “Renee is a whore!” and repeated the phrase over and over.

42. Vee Jones also accused Larr of sleeping with Scott Jones.

43. When Vee Jones was asked to leave she shouted, “What are you going to do? Make me!” and continued to scream vulgarities.

44. Larr asked other employees to call the police.

45. Larr was informed that the police could not be called unless Scott Jones said it was acceptable.

46. Vee Jones also screamed “I’m coming back! I’m not done! I will be seeing you soon!”

47. Vee Jones also screamed “Yeah, I’m a ghetto bitch from Philly. You think this is ghetto? You ain’t seen anything yet.”

48. Vee Jones then left ChaCha.

49. Shortly after Vee Jones left ChaCha, Scott Jones arrived on the premises and called a meeting before all employees on the premises.

50. During the meeting, Scott Jones attempted to explain Vee Jones’ behavior.

51. Larr later filed a police report with the Fishers Police Department on or about July 17, 2013.

52. Further, on July 17, 2013, at approximately 4:35 p.m. Vee Jones sent Larr a text that said “say hi to my husband for me.” Later that same night Vee Jones sent Larr a text that said, “whore” and another that said, “Big slutty ugly baby spice on crack looking white whore.”

53. Further, at 11:07 p.m. on July 17, 2013, Scott Jones sent an email to the ChaCha staff that stated:

Thanks, Stephanie and Doug for letting the team know in a timely fashion.

All,

I'm very sorry for the disruption(s). And I just want to thank all of you for your thoughtful support earlier this afternoon. It meant a LOT to me, and it's helped me get through the last several hours.

For those who weren't part of the impromptu meeting, I am dealing with my wife, Vee, who is possibly suffering from some combination of post-partum depression and/or THC abuse and/or bi-polar issues and/or something even more serious. I am trying to minimize any impact for any of our employees. And, as a company, let me assure you that we will take whatever steps are necessary to stop the distractions and issues. You have my word.

--Scott

54. During the days following the confrontation, Vee Jones conducted a threatening and disparaging campaign toward Larr through the use of her Twitter account. For example, Vee Jones wrote tweets directed to Renee Larr and about Renee Larr and published the tweets on Twitter. Renee Larr's Twitter account was handled under the account @reneelarr12. Scott Jones' Twitter account was handled under @chachaman. Vee Jones' tweets included, but were not limited to:

- a. @reneelarr12 the fishers cop just called me. Why would I go on your property? You're the one on my property @chachaman but you can have him
- b. Oh god! Now @reneelarr12 is telling people I'm going to her place with a gun? Honey Bunny, I don't need a gun to fuck with you.
- c. She can be your fun mouth bucket for when you're ready to empty your load. I don't need any more babies with you. Bad examples we are :-/
- d. If I ask u if ur sleeping w/ my man & u don't deny it? & Your only response was "Got nothing to say to you" serious? pic.twitter.com/i7lw6VBolm
- e. Hey Whore's husband. Here's a truck to find out the truth, check her phone records. Ask why she be contacting the CEO after hours?
- f. Ask her how she managed to get a raised asap, but had to go through 3 managers in 9 months...and got a new bag out of it lol just ASK HER.
- g. Can't wait to go on vacation so my husband's mistress could be jealous because she looks like a dog & is stuck w/ her "loser" husband #shame

- h. Calling the cops?! Seriously? Bitch if I wanted to fuck you up I would've already. I'm must gonna embarrass you, him and me:-)
- i. I confronted her @chacha in her office in front of everyone and asked if she was sleeping with my husband. She didn't deny it, just hid:-/
- j. Sent her this text in the morning. If you weren't fucking him why you crying and hiding? Won't even talk to me SMH pic.twitter.com/GnEjL6ztQF
- k. @reneelarr12: Our new home! pic.twitter.com/R5eYXxQeTJ" awww was this taken after you blew my hubby?
- l. @chachaman sorry I missed you @chacha:-(but got to say hi to @reneelarr12 she does look old and dying:-/
- m. While I was pregnant and puking 6 x a day carrying a baby named after my husband we made out of love, @reneelarr12 kept my him happy:-) thnx
- n. Hi I married @reneelarr12 and unbeknownst to me, I was tasting her boss every time I kiss her:-/ he...instagram.com/p/b4YR-roXBT
- o. Ruff ruff
Wonder if your husband knows? That you blow your boss? And then kiss him afterwards? You're trifling good for nothing.<3
- p. @reneelarr12 I see that you're an expert on social media but you're letting @chacha sink, can you handle that too?
- q. @reneelarr12 hey sent you a text! Hope to chat with you face to face real soon when I get back from vacay;-)
Left several messages. Ttyl
- r. Got to bark at this dog @reneelarr12 my husbands company today. I'm sure he'll divorce me since I...instagram.com/p/b4YKDpoXBE/
- s. "@reneelarr12: My husband asked me to go with him to get hoes.
#bestwifeeverpic.twitter.com/a5ITngEqMp" hey dude how did my hubs tatse?
Contemplating If I should make a trip to @ChaCha to say hi to my husband @chachaman... Wonder if they will keep the doors locked now?

55. Vee Jones' campaign caught the attention of various internet media outlets who then began re-publishing Vee Jones' assertions that Larr was having an affair with Scott Jones as well as Vee Jones' tweets. One Article was titled "ChaCha CEO Scott Jones is having an Affair with Employee Renee Larr, so claims his Wife on Twitter."

56. Larr has never been in a sexual relationship with Scott Jones and the allegations of Vee Jones were untrue. However, Larr subsequently resigned from ChaCha due to the unimaginable condition of having to work for an employer, when the Chief Executive Officer of that employer, was married to an individual who conducted such a malicious and hostile campaign toward her.

V. LEGAL ALLEGATIONS

57. Larr hereby incorporates paragraphs one (1) through (56) as set forth herein.

58. Larr was sexually harassed by Vee Jones, the spouse of the CEO for ChaCha.

59. The sexual harassment subjected Larr to a sexually hostile work environment that was sufficiently severe or pervasive to alter the conditions of Larr's employment and to create an abusive working environment.

60. The sexual harassment was sufficiently severe or pervasive that it altered the conditions of Larr's employment and created an intimidating, hostile, offensive, and abusive working environment.

61. In light of Vee Jones' relationship to ChaCha and Vee Jones' prior behavior(s), ChaCha received notice and knew, or should have known, the Larr would be sexually harassed.

62. ChaCha failed to take reasonable steps to prevent the harassment once it knew, or should have known, of the reasonable probability that the harassment would occur.

63. ChaCha's failure to discover or prevent the sexual harassment gave rise to a hostile work environment resulting in Larr's constructive discharge.

64. ChaCha failed to remedy or prevent a hostile or offensive work environment of which it knew, or should have known.

65. As a result of ChaCha's actions, Larr has sustained damages including but not limited to economic loss, loss of reputation, loss of enjoyment of life, mental anguish and emotional injury.

66. ChaCha's actions and omissions violated Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* as amended.

VI. REQUESTED RELIEF

WHEREFORE, Plaintiff, Renee Larr, requests the judgment of this Court be held in her favor as follows:

1. Order Cha Cha to pay Larr any and all lost wages and the monetary value of all benefits associated with her employment;
2. Order Cha Cha to pay Larr compensatory damages for the mental anguish and consequential harm she suffered;
3. Order Cha Cha to pay Larr's reasonable attorney fees and costs;
4. Order Cha Cha to pay interest on all sums recoverable; and
5. Award to Larr all other relief that is just and proper.

Respectfully submitted,

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DEMAND FOR JURY TRIAL

Plaintiff, Renee Larr, by counsel, demands a trial by jury on all issues deemed so triable.

Respectfully submitted,

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