

FILED
DISTRICT COURT
SAVANNAH DIV.
APR 23 2015
CLERK
SO. DIST. OF GA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SOUTHERN DIVISION

JAMEKA K. EVANS)
Plaintiff,)

v.)

Case No. CV _____

GEORGIA REGIONAL HOSPITAL AT)
Defendant. SAVANNAH)

CV 415-103

EMPLOYMENT DISCRIMINATION COMPLAINT

1. Plaintiff resides at: 504 1/2 WEST 36TH ST. UPPER
(Street)
SAVANNAH GA. 31415
(City) (State) (Zip Code)

2. Defendant's name:
CHARLES MOSS, LISA CLARK AND JAMEKIA POWERS

Location of defendant's principal office:
1915 EISENHOWER DRIVE
SAVANNAH, GA 31406

Nature of defendant's business:
MENTAL HEALTH

Approximate number of individuals employed by defendant: OVER 500

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. § 2000e-5. Equitable and other relief are also brought under 42 U.S.C. § 2000e-5(g).
- This action is brought pursuant to Age Discrimination in Employment Act of 1967 for employment discrimination based upon age. Jurisdiction is conferred by 29 U.S.C. §§ 626(c)(1) and 626(e), and appropriate relief is also sought.
- This action is brought pursuant to the Americans with Disabilities Act of 1990, for employment discrimination on the basis of disability. Jurisdiction is conferred by 42 U.S.C. § 12117(a), and appropriate relief is also sought.

4. I have filed a charge with the Equal Employment Opportunity Commission (EEOC) regarding defendant.

Attach a copy of the charge(s) filed with the EEOC to this complaint.

- I have not filed a charge with the EEOC.

5. I have received a Notice of Right to Sue letter from the EEOC on 1/23/15.
(date)

Attach a copy of the Notice of Right to Sue letter to this complaint.

- I have not received a Notice of Right to Sue letter from the EEOC.

6. The acts complained of in this suit concern:

- Failure to hire me
- Termination of my employment
- Failure to promote me
- Demotion

- Denial of equal pay or work
- Sexual harassment
- Other (specify) HARRASSMENT, PHYSICAL ASSAULT/BATTERY

7. Plaintiff

- is presently employed by defendant
- is not presently employed by defendant

The dates of plaintiff's employment were 8/1/12 - 10/11/13

The reason(s) for the end of plaintiff's employment by defendant is/are:

- Plaintiff was discharged.
- Plaintiff was laid off.
- Plaintiff left the job voluntarily.

8. The conduct of defendant is discriminatory with respect to:

- my race
- my national origin
- my religion
- my age
- my sex
- my disability

9. The name, race, sex, and position or title of the individual(s) who allegedly discriminated against me during my period of employment with the defendant company is/are:

<u>Name</u>	<u>Title</u>	<u>Race</u>	<u>Sex</u>
(1) <u>CHARLES MOSS</u>	<u>CHIEF</u>	<u>BLACK</u>	<u>MALE</u>
(2) <u>LISA CLARK</u>	<u>DIRECTOR</u>	<u>WHITE</u>	<u>FEMALE</u>
(3) <u>JAMEKIA POWERS</u>	<u>SR. HR MANAGER</u>	<u>BLACK</u>	<u>FEMALE</u>
(4) _____	_____	_____	_____
(5) _____	_____	_____	_____
(6) _____	_____	_____	_____

10. Describe the discriminatory actions or events that you are complaining of in this lawsuit.

Give factual detail, including names and dates concerning what happened. You do not need to refer to any statutes or cite law.

I WAS TARGETED BY MR. MOSS FOR TERMINATION DUE TO THE FACT THAT I DO NOT CARRY MYSELF IN A TRADITIONAL WOMAN MANNER. I AM A GAY FEMALE, I DO DID NOT BROADCAST MY SEXUALITY. ALTHOUGH, IT IS EVIDENT I IDENTIFY WITH THE MALE GENDER BECAUSE I PRESENTED MYSELF VISUALLY (MALE UNIFORM, LOW MALE HAIRCUT, SHOES, ETC.)

- D) DISCUSSED MY SEXUAL PREFERENCE DURING THEIR CONVERSATION FOR I NEVER MET JAMEKIA POWERS BEFORE THIS HARRASSMENT STARTED, NOR HAVE I DISCUSSED MY SEXUAL PREFERENCE WITH HER.
- E) BEING PUNISHED BECAUSE ~~HER~~ ^{MY} STATUS AS A GAY FEMALE DID NOT CONFORM TO MY DEPARTMENT HEAD'S (CHIEF MOSS) GENDER STEREOTYPES ASSOCIATED WITH WOMEN. THIS CAUSED A GREAT STRAIN ON ME AND CREATED AN HOSTILE WORK ENVIROMENT. CHIEF MOSS ALSO APPOINTED/PROMOTED A LESS QUALIFIED PERSON WITH NO PRIOR SECURITY EXPERIENCE AS MY DIRECT SUPERVISOR

FACTUAL DETAIL (ATTACHMENT)

- 10) ALSO, BY ME GOING TO HR CHIEF MOSS WAS TRYING TO FIND WAYS ~~TO~~ ~~OF~~ OF TERMINATING ME, THIS IS EVIDENCE OF RETALIATION. THIS INFORMATION IS FROM SGT. HARVEY PEGUE WHO WORKED CLOSELY WITH CHIEF MOSS. EMAILS SENT ~~TO~~ FROM SGT. PEGUE'S SHOWS THAT CHIEF MOSS WAS DETERMINED TO MAKE ~~MY~~ MY EMPLOYMENT UNBEARABLE (EMAIL INCLUDED), MR. MOSS DID EVERYTHING HE COULD TO TERMINATE ME INCLUDING SEVERAL NOTICES. HE WENT AS FAR AS STATING TO SGT. PEGUE OF GETTING RID OF ME BECAUSE I HAD TOO ^{MUCH} INFORMATION OF WRONG-DOING BY HIM IN THE DEPARTMENT. SEE EMAILS DATED MONDAY FEBRUARY 3, 2014.

ON 7/3/16, I WAS STANDING IN THE OFFICE BETWEEN OFFICE AND DOOR. MR. MOSS REPEATEDLY SHUT THE DOOR ON ME WITHOUT GIVING ME THE OPPORTUNITY TO MOVE. THIS IS IN VIOLATION OF THE POLICY # 22-1201 STANDARDS OF CONDUCT AND ETHICS IN GOVERNMENT. TO STRENGTHEN MY CASE, ON OR ABOUT 8/16/2013, I TOOK MY CONCERNS TO LISA CLARK (NOT ONLY SCHEDULING BUT EVERYTHING). THE FACT I RECEIVED A LETTER DATED SEPT. 30, 2013 FROM CHERYL SAUNDERS STATING ALL MY ALLEGATIONS WOULD BE INVESTIGATED, WHEN I SPOKE WITH JAMEKIA POWERS SR. HR MANAGER AND SHE POSED THE QUESTION OF MY SEXUALITY GIVES ME AND OTHERS THE INFERENCE THAT MY SEXUALITY WAS THE BASIS OF HARRASSMENT. I CAN ALSO BE INFERED THAT MR. MOSS AND UPPER MANAGEMENT HAD DISCUSSED THE FACT I AM GAY, AND MR. MOSS DID IN FACT DISCUSS MY SEXUAL PREFERENCE DURING THE INVESTIGATION.

11. The alleged illegal activity took place at:

1915 EISENHOWER DR.
 (Street)
 SAVANNAH GA. 31406
 (City) (State) (Zip Code)

12. State what relief you are seeking from the Court. If you are seeking monetary award (back pay or damages), state the amount you are seeking. If you are seeking injunctive relief (an order by the Court) issued against defendant, summarize what should be in the order.

JAMEKA EVANS PRAYS THAT ALL DEFENDANTS BE HELD JOINTLY AND SEVERALLY LIABLE. THAT PROCESS ISSUE AND DEFENDANTS SERVE WITH PROCESS, THAT A JURY TRIAL BE HELD. THAT EACH TORT ALL DEFENDANTS BE HELD LIABLE (DISCRIMINATION, BASED ON MY SEX AS A GAY FEMALE IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED. HARRASSMENT AND RETALIATION FOR SPEAKING WITH HR ABOUT THE TREATMENT I RECEIVED FROM CHARLES MOSS AND FOLLOWING THE CHAIN OF COMMAND. THAT THE AMOUNT OF DAMAGES INCLUDE PUNITIVE DAMAGES IN THE AMOUNT OF \$400,000.00. THAT PLAINTIFF BE AWARDED ALL COST AND EXPENSES OF ~~THE~~ LITIGATION TO INCLUDE ATTORNEY FEES AND ALL OTHER COST THIS HONORABLE COURT DEEMS JUST AND REASONABLE. PLAINTIFF ~~RESERVES~~ RESERVES THE RIGHT TO AMEND THIS COMPLAINT AS NEW INFORMATION ARISES.

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. § 1746; 18 U.S.C. § 1621.

4/23/2015
Date

Pamela Evans
Signature of Plaintiff

Plaintiff's Address: 504 1/2 WEST 36TH ST. UPPER UNIT
(Street)
SAVANNAH, GA 31415
(City) (State) (Zip Code)

EXHIBIT 1

September 2, 2013

Summary

I feel I am being targeted for termination by Chief Moss. I have spoken with various people to address the situation; however no notice has been taken. Within the past two months, I have received multiple letters of concern from Chief Moss. Prior to his appointment to his position I had none. I am being over scrutinized to allow any mistake I make to be harped on and used to propel my termination. I also believe he is utilizing the newly appointed second shift supervisor, Corporal Johnson, to report any and all activity pertaining to me, even after she is off the clock.

Record of Incidents

Date

Incident

07/03/2013

Chief Moss stood outside of the office and asked me did I have an assignment. I replied that I'd just pulled this contraband for unit six. He then stated "you know you can't hang out here". He proceeded to walk into the office while I was standing in the threshold and started to close the door with me standing there. He said "excuse yourself" several times while repeatedly closing the door on me. I believe him intentionally using a door to repeatedly bump me is a violation of DBHDD Human Resources Policy #22-1201 Standards of Conduct and Ethics in Government.

08/15/2013

On or about August 15, 2013, I was notified that when the 12 hour shift change occurred, I was the only person from the first shift to be moved to the second shift. This caused me major stress and concern so I went to speak to Ms. Lisa Clark about my scheduling issues around 9:00 am. I'd previously spoken to two others who worked in her office about my concerns in my department; she said they'd spoken to her about them. I restated my concerns to her, which were: (1) My being the only officer removed from the first shift to the second shift, (2) Chief Moss' incident of inappropriate action regarding him closing the office door against me, (3) Chief Moss appointing an officer that had no experience being a corporal and who was straight out of orientation as the second shift supervisor, etc. I also stressed to her that being changed from the first shift to the second shift was putting my job in danger. I expressed my concern of being targeted by Chief Moss for termination. She concluded our meeting saying that she would talk to Chief Moss and get back to me about the new corporal, Shanika Johnson.

Johnson had just gotten out of orientation on 08/14/2013 for her new promotion to corporal and was then scheduled to be my supervisor on the second shift. I have been a state employee for over a year. With her new position, she also works 3pm-11 pm and has every weekend off, while the schedule for all other officers (cpls) is a 12 hour shift from either 7 am-7 pm

or 7 pm-7 am. On 08/16/2013 around 2 pm, I called Ms. Clark to touch bases with her about my concerns. She told me to "work 1 pm-7 pm second shift and then go back to your original first shift" and that she would let Chief Moss know. On 08/19/2013 at 8:20 am, I received a text from Ms. Clark saying "Hi Corporal Evans.....I spoke with Chief Moss about your schedule.....let's try it for a week and see how it goes, and then let Chief know if it is not working for you and go from there.....thx. Lisa Clark". I spoke with her in private because I feel Chief Moss was aware of as well as caused these scheduling conflicts. Ms. Clark states that she tried to speak with Chief Moss about his appointment of Corporal Johnson to Star Corporal with no experience, but says he really didn't address it. She said nothing about his incident with the door.

08/20/2013

On the first night of my shift change, Corporal Shanika Johnson approached me wanting to have a conversation where she stated that if she was in my position she'd be upset too. She then stated that she tried to soften the blow of her being my supervisor by getting word to me sooner (refer to notarized witness statement – the witness is Corporal Johnson's sister). This suggests that she knew in May that Chief Moss would appoint her to that position before anyone else even knew there was going to be a new position. She also asked if I talked to someone 'over Moss' head' about his scheduling and other things. She said that he was upset about it and might have been willing to work with me before, but now forget it.

08/20/2013 –
08/24/2013

Corporal Shanika Johnson begins her position as shift supervisor and starts to over scrutinize and harass me after she has clocked out. Cpl. Johnson called dispatch on 8/20/13 to see if I reported for my shift at 1 am. Her shift ends at 11:30 pm. At 6 am on 8/20/13 she called admissions while I was processing a patient. She then called behind the P.A. desk to get them to give me the phone. I told them to transfer the call to the office. When I picked up the office phone she asked, "What is going on, I heard the traffic on the radio."

8/24/13- Cpl. Johnson called at 4:45 am to dispatch saying "I heard the traffic on the radio". Then she proceeds to ask me did another officer unlock building 12 and where was he right then? I told her that I'd just called him over the radio; that there was no problem but I didn't know where he was yet. Also, I stated that it's 4:45 am, and it's ok to not be here. She responded by telling me to "shut up". We both hung up the phone.

08/28/2013

At 5:00 pm a mandatory department meeting was held and to be discussed were job duties, expectations, policy, rank structure, and future changes. At about the midpoint of the meeting, it was mentioned by Chief Moss that I was rude to a staff member while working on the night shift recently. This was a recorded staff meeting and there was no specific comment made towards any other officer concerning a direct incident occurring on their shift. The comment was an untrue statement. He had no idea who said I was

rude. The young lady in question was asked to write a statement in which she reported no such allegation.

08/29/2013 Corporal Johnson told me that Human Resources asked Chief Moss how many letters I'd gotten. He responded with saying that if I get three more in the month of September then I'm gone.

08/29/2013 On or about 08/29/2013, Corporal Johnson was still in the office at 1:11 am and her shift ended at 11 pm. She stated that she stayed to send an email out, but the email that she sent was time stamped for 12:16 am. She said that she'd clocked out earlier, but she was still there.

On 9/03/2013 upon arrival on shift, I went into Security's office to grab my equipment (radio, clip, and shoulder-mike). My radio was not in its designated spot and didn't appear to be in sight. My radio comes across the transmitter as officer #2. I pressed the transmitter on each radio until I discovered my name tab had been removed from my radio, replaced with a new officer's name and in his designated slot. My shoulder mike is always placed in my supervisor's office in the top right drawer at the end of each shift. It was not there, only my clip remained. Later on during my shift (between 9-10 pm), I was notified by another officer that Chief Moss stated he had done this, claiming there was no name tab on the radio and it was not in its designated spot, and to switch the radios back around. The equipment that was issued to me required my signature; extra precautions were taken by me to assure easy identification. My last day on shift was 8/30, and my equipment was intact as we would have to report any damages done in line of duty; and my shoulder mike is still missing. For these reasons I did not use the equipment that was tampered with. There is no way to issue a radio that is currently in our office to a new officer, as all officers had to sign initially for them.

Subject: Fwd: Harvey Pegues Work Environment Complaint
From: jamekaevans@yahoo.com (jamekaevans@yahoo.com)
To: jowannaevans@yahoo.com;
Date: Monday, February 3, 2014 8:43 AM

Begin forwarded message:

From: Harvey Pegues <harveypegues@gmail.com>
Date: January 17, 2014 at 1:41:45 PM EST
To: jamekaevans@yahoo.com
Subject: Fwd: Harvey Pegues Work Environment Complaint

----- Forwarded message -----

From: Harvey Pegues <harveypegues@gmail.com>
Date: Fri, Jan 17, 2014 at 1:09 PM
Subject: Harvey Pegues Work Environment Complaint
To: pabrown4@dhs.state.ga.us

I am being harassed daily by Chief Charles Moss. Everyday he comes in to work and says at least something job threatening to me. (I.E) He has told my subordanites (Imma get him mad and have him come out of character then imma fire his ass). Chief Charles Moss has a large amount of favoritism going on in the Department. He wrote me up for running home (2.4 miles away) to go lock my door to the house without clocking out, when only a few days ago he let Cpl. Hotchkiss go off campus to go get her phone fixed because her screen stop working during work hours (on the clock). Also letting her pick it up when it was ready on the clock also he wanted her to get his wife weave for her hair so that Cpl Hotchkiss could do it, but the store was closed at that time. If your doing something for him or benefiting him on the clock you can go without clocking out. He has also changed my schedule 5 times since August I can't plan my personal life around the scheduling comfortably (Sgt. weaver can also relay the same message because he has to do the scheduling). It literally feels like having a bully after you. He has most of the department scared for the loss of their job so they don't report these things. We had a big uproar before behind the favoritism and it hasn't stop since only have gotten worse. He gave me a pager as a contact for the dept., both Sgt.'s have one. He got mad at me took mine and gave it to my subordinate. I provided several schedules to (Human resources) supporting these changes. On the subject of scheduling all Sgt.'s have every weekend off and a 8 hr shift. For me he has me working 12 hrs with two Cpl. working 8 hrs one being on my shift. He was mad at Sgt. a few months ago stuck him on nights for 2 months, after that he got mad at me stuck me on nights, gave me a 12 hr shift and to make me made he gave Sgt. Weaver a 8hr Shift (10-8) which is obviously customized) he didn't hire several people telling them there was no customized shift when there is. He has our department once again playing sides. He starts rumors tells your personal business, it has just become unbearable. I love my job but when

man can run around and tell your personal business, show your subordinates, favoritism ,target you job and way of life because of personal feelings, harass you daily, is not professional. This is the second time Ive spoke with Human Resources on Chief Moss ways. He has fired several employees to prove a point or personal reasons. The Department is scared because of such behavior. I want to be able to come to work do my job and not have to watch my every step as it use to be before he took the roll of Chief, Department head. Here recently several people have being talking about him going around bragging on Slamming a consumer and kicking/kneeing him in the mouth. Cpl. Johnson was said to have pulled him off the consumer getting her self hurt in the process but due to the relationship they have she wouldn't tell. but Ive over heard conversations of the real story. I ask and beg of Human Resources to rid the problem our department so ever needs so that we can have a safe, friendly work environment. Its so much tension and hostility that the air is thick to breath in once you enter the office. As I said I love my Job never called out of work been late a few times, since he wants me gone now, He is targeting every little thing I do, just as he has done for the previous ones fired. We are short due to 3 officers quitting (Cpl. Evans) due to the altercations daily with Chief Moss, Officer Blot going to Chatham County Sheriffs dept. because Chief Moss picked others over he coming from the contract side several times when she obviously earned it. and Officer Brown which stated he wasn't coming back because Moss was a liar and vindictive and he can't be around that type of childish behavior. Now our department can't find people that want to come aboard due to the rumors of Chief Moss and our departmental problems. Chief Moss is changing so many things that it is now stirring up chaos amongst the nursing staff. Ive even heard from one of the campus supervisors "Ive never seen so much mess from Security in my 27 years of being here" I just ask that you guys please help our department and make this a comfortable place to work again everyone else in my department feels the same way they are just scared or have joined alliance with him in order to save their jobs. Sgt. Weaver feels the same way I feel along with others like Cpl Willis, Ofc Gamble, Cpl Bisard. The rest of them may lie for him because the rest of them are the once that receive the "Special Attention".

Harvey Sanchez Pegues
Direct Contact Cell:4047341117
Email:Harvey.Pegues@Gmail.com
State Email:Hpegues@dhr.state.ga.us
Work Phone 9123562396 Ext. (1992)

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Harvey Sanchez Pegues
Direct Contact Cell:4047341117
Email:Harvey.Pegues@Gmail.com
State Email:Hpegues@dhr.state.ga.us
Work Phone 9123562396 Ext. (1992)

07/10/14
S01 SSN 252 71 2510 BYB 05 29 14 CWR 05 25 14 EMPLID 5512 08:10:43
JAMEKA K EVANS
SEPARATION
FACT FINDING OF: EMPLOYER
DATE ENTERED 06/13/14
EMPLOYER NAME DEPT OF BEHAVIORAL HEALTH
TYPE ISSUE QUIT

CHANGE DATE 06 19 14 CHG EMPLID 5512

06-13-14 01:30PM 1199FF ON FILE - QUIT - NO REASON GIVEN..
SPOKE TO METTA - REQUESTED REBUTTAL REPLY DUE BY 06-17-14 01:30PM.
DECISION WILL BE RELEASED WITH AVAILABLE INFORMATION..IMC
06-19-14 08:30AM V.M. LEFT 06-17-14 12:54 BY PHYLLIS FROM EQUIFAX. THE EMPLOYER
WAS NOT AWARE OF HER BEING HARRASEED OR MADE AWARE OF HER SITUATION. SHE DID
NOT BRING HER CONCERNS TO H.R. SHE WAS AWARE THAT HER SCHEDUEL COULD CHANGE
AT ANY TIME. SHE DID NOT HAVE A SET SCHEDULE. ..IMC

NA: PF: 3-PREVMENU 4-MN00 5-PRT 7-BKWD 8-FRWD 9-PSCR 11-NA

Sheila D. Burroughs
Sheila D Burroughs
Notary Public
Chatham County, Georgia
My Commission Expires June 27, 2017

FEB 03 2014
EEOC-SLO

To whom This letter may concern.

On or About mid May, 2013

It was told to me by Shenika Nichole Johnson that "MOSS" was becoming "Chief" of the security department at Georgia Regional Hospital. She then stated that he was promoting her to be Jameka Evans supervisor, and she didnt think Jameka would be too happy about that. I asked her how was she getting promoted so high & so soon??! She started because thats where "MOSS" wants her because she had graduated last year June 26²⁰¹² with what I believe, A criminal justice degree. She then went on to say both her & MOSS were expecting Jameka to quit her job as the outcome of Shenika being her new supervisor. Shenika also stated how her & MOSS believed when he changed the shifts to "12 hours" Jameka would quit because of her school schedule (night class) and work schedule clashing.

-Julisia J.M. Bedford
-Julisia J.M. Bedford

DISMISSAL AND NOTICE OF RIGHTS

To: **Jameka K. Evans**
1102 East 33rd Street Apt D
Savannah, GA 31404

From: **Savannah Local Office**
7391 Hodgson Memorial Drive
Suite 200
Savannah, GA 31406

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
415-2014-00297	Diego Torres, Investigator	(912) 920-4492

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state)

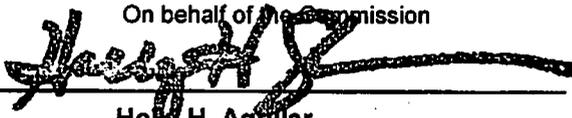
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Holly H. Aguilar,
Director

JAN 23 2015

(Date Mailed)

Enclosures(s)

cc: **Brenda King Woodard, Esq.**
Director, Legal Services
DBHDD, Office of Legal Services
2 Peachtree St., N.W., Suite 22-215
Atlanta, GA 30303



Georgia Department of Behavioral Health & Developmental Disabilities
Frank W. Berry, Commissioner

Georgia Regional Hospital at Savannah
1915 Eisenhower Drive, Savannah, Georgia 31406 ~ 912-356-2045

September 30, 2013

Hand Delivered

Ms. Jameka Evans
2136 Texas Ave.
Savannah, GA 31404

Dear Ms. Evans:

This letter is in response to your complaint submitted to the Savannah Human Resources Department on September 4, 2013, in which you alleged concerns against supervisor (C. Moss) regarding the following: targeting you for termination, to include—favoritism toward certain staff, inconsistent and unfair practices and decisions, and inappropriate conduct.

Please know that the Department takes allegations of this nature very seriously. We have thoroughly reviewed the information and documentation you provided, conducted interviews with the appropriate employees, and gathered other information to assist us with looking into your concerns. Although we are unable to substantiate that you are being singled out and targeted for termination, we will however, be following up with management to address and reiterate the following: Standards of Conduct, effective communication within and between staff and management in the Security Department, and the coordination/handling of some recent changes within the department.

Please know that the appropriate management official(s) have been notified, and will work to address these issues. We will be working to provide assistance and guidance to ensure there is a positive and productive work environment in the Security Department.

If you have any additional questions, please feel free to contact me at (912) 356-2022.

Sincerely,

Cheryl Saunders
Employee Relations Coordinator

c: HRM File
Jamekia Powers, Sr. HR Manager

Subject: Fwd: Statement
From: jamekaevans@yahoo.com (jamekaevans@yahoo.com)
To: jowannaevans@yahoo.com;
Date: Monday, February 3, 2014 8:42 AM

Begin forwarded message:

From: Harvey Pegues <harveypegues@gmail.com>
Date: January 22, 2014 at 9:18:44 AM EST
To: jamekaevans@yahoo.com
Subject: Re: Statement

Yes he has. He said he had to get her out of the department before she takes out of a lawsuit. He said she has substantial evidence of wrong doing so he will wait till things "simmer down"

Yes he said he had the qualifications change and tailored to his experience to knock out other candidates

Yes he wanted he to say something out of policy or SOP to use against her in firing her and target every little thing possible to terminate her.

Harvey S Pegues

On Tue, Jan 21, 2014 at 4:54 PM, <jamekaevans@yahoo.com> wrote:

Has Chief Moss ever discussed or mentioned trying to terminate or retaliate on Jameka Evans? If so explain. (Any specific details you remember, like dates or times should be mentioned).

Has Chief Moss ever disclosed information to you pertaining to his position? (How he got the position, who appointed him, requirements, ect.)

Has Chief Moss ever admitted to intentionally bullying, intimidating, or provoking a response from Jameka?

The answers can be answered in any order. Write responses in the form of a statement and be sure to provide your signature.

--

Harvey Sanchez Pegues
Direct Contact Cell:4047341117
Email:Harvey.Pegues@Gmail.com
State Email:lpegues@dhr.state.ga.us
Work Phone 9123562396 Ext. (1992)