

IN THE CIRCUIT COURT OF ST. LOUIS CITY
STATE OF MISSOURI

KAZIA STEELE)
)
St. Louis, MO.)
)
Plaintiff)
)
v.)
)
ST. LOUIS CARDINALS)
)
Defendants)
)
Registered Agent:)
Serve: Frederick O. Hanser)
250 Stadium Plaza)
Saint Louis, MO 63102-1727)

Case Number: 1022-CC-1934

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PETITION FOR DAMAGES

Plaintiff Kazia Steel (Plaintiff), for her Petition against Defendants St. Louis Cardinals (Defendants), alleges and states as follows:

Parties

1. Plaintiff is an African American Female citizen of the State of Missouri.
2. Defendant St. Louis Cardinals Company is a Corporation organized under the laws of the State of Missouri with a principal place of business located in Missouri. At all relevant times, Defendant was authorized to conduct business in the state of Missouri and was doing business in the state of Missouri. At all relevant times, Defendant maintained and operated its headquarter place of business at. Defendant is an "employer" within the meaning of the Missouri Human Rights Act, R.S.Mo. §213.010(7)("MHRA").
3. Jurisdiction and venue are proper in St. Louis City, Missouri, Pursuant to R.S.

Mo. §213.111.1

4. On or about February 19th 2008, Plaintiff timely filed with the Missouri Commission on Human Rights, (“MCHR”) and the Equal Employment Opportunity Commission (“EEOC”) a charge of discrimination and retaliation.

5. On or about February 10, 2010 MCHR issued Plaintiff his Notice of Right to Sue (Attached as exhibit A and incorporated here by reference), and this lawsuit was filed within 90 days of MCHR’s issuance of that Notice of Right to Sue.

6. The aforesaid charges of discrimination provided the MCHR and the EEOC sufficient opportunity to investigate the full scope of the controversy between the parties and, accordingly, the sweep of judicial complaint may be and is as broad as the scope of a MCHR and/or EEOC investigation which could reasonably be expected to have grown out of the change of discrimination.

7. Plaintiff has satisfied all private, administrative, and judicial prerequisites to the institution of this action.

COUNT I

(St. Louis Cardinals – Violation under MHRA, R.S.Mo. 213.010 et seq. – Racial Discrimination)

8. Paragraphs 1 through 7 above are incorporated herein by reference.

9. Plaintiff became employed as an intern by Defendants on approximately July 2005 and during all relevant times, Plaintiff performed her job competently.

10. Plaintiff received awards and recommendations for outstanding work while working as an intern for Defendant.

11. Plaintiff was not offered full-time employment after the end of the internship equivalent to her non-Black counterparts.

12. All of the other Defendant's non-Black employees were offered full-time employment upon their completion of their internship.

13. Plaintiff was the only intern offered menial full-time employment with Defendant.

14. Defendants conduct has caused Plaintiff financial injury.

15. Defendants conduct has caused Plaintiff loss of self esteem.

16. As shown by the foregoing, Plaintiff suffered intentional discrimination at the hands of Defendant's employees and Defendants during the course of his employment with Defendants, based on racial discrimination, in violation of the MHRA.

17. As a direct and proximate result of Defendants actions and/or omissions, Plaintiff has been deprived of income, as well as other monetary and non-monetary benefits.

18. As a further direct and proximate result of Defendants' actions and/or omissions, Plaintiff has suffered a loss of self-esteem, humiliation, emotional distress, mental anguish, pain, and related compensatory damages.

19. Defendants failed to make good faith efforts to establish and enforce policies to prevent illegal discrimination against their employees, including racial discrimination.

20. As shown by the foregoing, Defendants' conduct was willful, wanton and malicious, and showed complete indifference to or conscious disregard for the rights of others, including the rights of Plaintiff, thus justifying an award of punitive damages in an amount sufficient to punish defendants or to deter them and other companies from like conduct in the future.

21. Plaintiff is entitled to recover from Defendants reasonable attorneys' fees, as

provided in the MHRA.

WHEREFORE, Plaintiff requests that the Court enter judgment in her favor and against Defendants St. Louis Cardinals , jointly and severally, for such damages, actual, nominal and punitive, as are fair and reasonable, in excess of Twenty-Five Thousand Dollars (\$25,000.00), for his reasonable attorneys' fees and costs incurred herein, for interest as allowed by law, and for such other and further legal and equitable relief as the Court deems proper.

COUNT II

(St. Louis Cardinals - Intentional Infliction of Emotional Distress)

21. Paragraphs through 22 above are incorporated herein by reference.
23. Defendant intentionally recklessly investigated Plaintiff's actions.
24. Defendants actions are extreme and outrageous.
25. Defendants conduct is the cause of Plaintiff emotional distress.

WHEREFORE, Plaintiff request that the court enter judgment in her favor and against Defendants St. Louis Cardinals, jointly and severely, for such damages, actual, nominal, and punitive, as are fair and reasonable, in excess of Twenty five Thousand Dollars (\$25,000.00) reasonable attorney's fees costs incurred herein, for interest as allowed by law, and for such other and further legal and equitable relief as the court deems proper.

COUNT III

(Sexual Discrimination in violation of R.S.Mo. 213.055.1(1))

25. Paragraphs through 26 above are incorporated herein by reference.
27. Plaintiff is Female.
28. Plaintiff competently fulfilled all task assign to her.

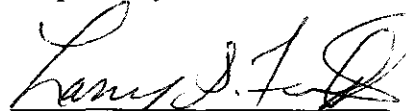
29. Plaintiff was terminated despite performing her job competently.
30. Male employees are not fired under the same rubric.
31. Plaintiff has suffered injury as a result of Defendants discrimination.

WHEREFORE, Plaintiff requests that the court enter judgment in her favor and against Defendants St. Louis Cardinals, jointly and severely, for such damages, actual, nominal and punitive, as are fair and reasonable, in excess of Twenty Five Thousand Dollars (\$25,000.00), reasonable attorneys' fees costs incurred herein, for interest as allowed by law, and for such other and further legal and equitable relief as the court deems proper.

JURY TRIAL DEMANDED

Plaintiff request a trial by jury in the Circuit Court of St. Louis City, Missouri on all counts.

Respectfully submitted,



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