

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI**

TROY DOYLE,	)	
	)	
Plaintiff,	)	
	)	Case No.
v.	)	
	)	Division No.
ST. LOUIS COUNTY, MISSOURI,	)	
	)	
Serve: Genevieve Frank, County Clerk	)	
41 S. Central Ave., 1st Floor	)	
Clayton, MO 63105	)	
	)	
Defendant.	)	JURY TRIAL DEMANDED

**PETITION FOR DAMAGES**

**Race Discrimination and Retaliation in Violation of  
the Missouri Human Rights Act**

COMES NOW Plaintiff Troy Doyle, by and through counsel, and for his Petition for Damages against Defendant St. Louis County, Missouri, states and alleges as follows:

1. Plaintiff Troy Doyle is an African American resident of Wentzville, Missouri.
2. Defendant St. Louis County, Missouri, is a body corporate and politic operating under a charter form of government. Pursuant to Section 1.010 of the St. Louis County Charter, Defendant "may sue and be sued as a county as authorized by law."
3. At all times relevant to this action, Defendant has been an "employer" within the meaning of the Missouri Human Rights Act ("MHRA"), Mo. Rev. Stat. § 213.010(8), in that it is a political subdivision of the State of Missouri.
4. Venue in this Court is proper pursuant to Mo. Rev. Stat. § 213.111, in that the unlawful discriminatory practices alleged in this action were committed in St. Louis County, Missouri.

5. Plaintiff has been employed by Defendant as a member of the St. Louis County Police Department from April 27, 1992, to the present.

6. Plaintiff was initially hired by Defendant as a Police Officer and he has received numerous promotions since his employment began, including promotions to the ranks of Sergeant, Lieutenant, Captain, and Lieutenant Colonel.

7. Plaintiff has also served in many different roles during his employment with Defendant. As a Police Officer, Plaintiff worked in multiple precincts and as a member of the Community Action Team. He also worked as a detective for the Bureau of Drug Enforcement, the FBI Gang Task Force, the Intelligence Unit, and the FBI Public Corruption Task Force.

8. As a Sergeant, Plaintiff worked in the North County Precinct and as part of the Neighborhood Policing Unit.

9. As a Lieutenant, Plaintiff worked in the North County and South County Precincts, as a Lieutenant-Interim Police Chief, and as the Commander of the City of Jennings Detail.

10. As a Captain, Plaintiff served as the Commander of the North County Precinct and as the Commanding Officer of the Division of Criminal Investigation.

11. Plaintiff has held the rank of Lieutenant Colonel since September 2014 and reports directly to the Deputy Chief of Police.

12. As a Lieutenant Colonel, Plaintiff has served as the Commanding Officer of the Division of Patrol, the Commanding Officer of the Division of Special Operations, and the Commanding Officer of the Division of Operational Support.

13. At all times relevant to this action, Plaintiff has performed the duties and responsibilities of his job in a satisfactory manner and has received numerous awards and commendations for his service.

14. Plaintiff has also been a strong advocate of police and community relations and is involved in several community-oriented programs, including serving as President of the National Organization of Black Law Enforcement Executives and founding the St. Louis County Police Department Police Athletic League.

15. Plaintiff has also been outspoken in identifying and opposing conduct within the St. Louis County Police Department that is racially offensive and/or racially discriminatory. On several occasions, Plaintiff reported instances in which officers or applicants engaged in racially discriminatory conduct or behavior and recommended that the officers or applicants be removed from, or not hired into, certain positions because of their conduct or behavior.

16. On April 29, 2019, Defendant's County Council selected Sam Page ("Page") to become the interim County Executive after the previous County Executive resigned.

17. After being selected as the interim County Executive, Page planned to run for election to the County Executive position when his term as the interim County Executive ended in November 2020. Soon after becoming the interim County Executive, Page began raising funds for his campaign.

18. On or about November 21, 2019, Page officially announced that he would be running for election. Page was running as a Democrat, and the Democratic primary for the County Executive position was scheduled for August 2020.

19. In 2019, Page invited Plaintiff to his house, where he told Plaintiff that he wanted him to be the next Chief of Police for the St. Louis County Police Department. Page also told Plaintiff that he was "the right person for the job," that "it was the right thing to do," and that it would be "historic."

20. The St. Louis County Police Department has never had an African American Chief

of Police.

21. The Chief of Police is appointed by, and reports to, the Board of Police Commissioners ("the Board"). The Board consists of five members, who are appointed by the County Executive and approved by Defendant's County Council.

22. When Page invited Plaintiff to his house, he told Plaintiff that he intended to appoint individuals to the Board who would support what he wanted.

23. Page directed Plaintiff to meet with Dr. Donald Suggs, the President and Publisher of the St. Louis American newspaper, to obtain his endorsement for Plaintiff to be the next Chief of Police, and to meet with Page's campaign manager, Richard Callow. Winston Calvert, Page's Chief of Staff, directed Plaintiff to speak to Sam Dotson, the former Chief of Police for the City of St. Louis, to obtain advice on being the Chief of Police. Dotson introduced Plaintiff to Tom Irwin, who was a political consultant for Centene Corporation.

24. In or about October 2019, Page directed Plaintiff to meet with William Ray Price, former Chief Justice of the Missouri Supreme Court, and Michelle Schwerin, a St. Louis attorney. Page told Plaintiff that he was going to appoint Price and Schwerin to the Board. Plaintiff subsequently met with Price and Schwerin separately on two different days. Page told Plaintiff after those meetings that Price and Schwerin were impressed by Plaintiff and that they both liked Plaintiff.

25. On November 1, 2019, Page announced that he was appointing Price and Schwerin to the Board. Defendant's County Council approved the appointments on November 5, 2019.

26. Page subsequently appointed two additional persons, Thomasina Hassler and Laurie Punch, to the Board. Defendant's County Council approved those appointments in late November 2019.

27. On multiple occasions in 2019 and 2020, Page told Plaintiff, when referring to Plaintiff's possible appointment as the Chief of Police, that he would "pull this across the finish line."

28. In mid-December 2019, in his role as Commanding Officer of the Division of Special Operations, Plaintiff recommended to then-current Chief of Police Jon Belmar that Lieutenant James Morgan (African American) be appointed as the Commander of the Tactical Operations Unit, which is part of the Division of Special Operations.

29. Shortly after Plaintiff recommended that Lieutenant Morgan be appointed as the Commander of the Tactical Operations Unit, Chief Belmar announced that all transfers would be suspended.

30. On January 10, 2020, Chief Belmar issued an order, effective January 12, 2020, transferring Plaintiff from the Division of Special Operations to the Division of Operational Support and transferring Lieutenant Colonel Jeffrey Bader (Caucasian) from the Division of Operational Support to the Division of Special Operations.

31. The Division of Special Operations is higher than the Division of Operational Support in the chain of command in the event the Chief of Police is absent or incapacitated.

32. Chief Belmar's decision to transfer Plaintiff and Lieutenant Colonel Bader was a deviation from the Police Department's standard procedures because the Department normally transferred the Commanding Officers of each division at the same time. Chief Belmar did not transfer the Commanding Officers of the Division of Patrol or the Division of Criminal Investigation and Plaintiff and Bader were the only Lieutenant Colonels who were transferred pursuant to Belmar's January 10 order.

33. Plaintiff's race and/or his opposition to racially discriminatory conduct within the

St. Louis County Police Department was the motivating factor in Defendant's decision to transfer Plaintiff to the Division of Operational Support.

34. On or about January 10, 2020, Chief Belmar and/or Lieutenant Colonel Bader assigned Lieutenant Jeremy Romo (Caucasian) to be the Commander of the Tactical Operations Unit instead of Lieutenant Morgan, whom Plaintiff had recommended.

35. The decision to not select Lieutenant Morgan to be the Commander of the Tactical Operations Unit was a deviation from the Police Department's standard procedures because the Department normally transferred the Lieutenant who was recommended by his Lieutenant Colonel to be the Commander of the Tactical Operations Unit.

36. In January 2020, Bader transferred Lieutenant Steve Hampton (Caucasian) to serve as the Commander of the Special Response Unit ("SRU") in the Division of Special Operations. In doing so, Defendant removed Lieutenant Ray Rice (African American) as Commander of the SRU, transferred Lieutenant Rice to the West County Precinct, and placed Lieutenant Rice on the midnight shift.

37. In January 2020, Page informed Plaintiff that Chief Belmar would be leaving his position within the next couple months and told Plaintiff to be prepared.

38. On February 10, 2020, Chief Belmar announced that he was retiring as the Chief of Police effective April 30, 2020.

39. In late January 2020, Page told Plaintiff that he was getting "push back" regarding the appointment of an African American Chief of Police and that he was now having difficulty "pushing this across the finish line."

40. Page also told Plaintiff on a separate occasion that he was "shocked" at what one or two members of the St. Louis Police Foundation said to him during a Foundation meeting

regarding the possibility of Plaintiff's appointment as the Chief of Police. Page stated that he "would have thought" he was "living in the 60's" based on the comment(s).

41. The members of the St. Louis Police Foundation, or the organizations that they represent, are known to provide significant financial support to the political candidates that they select. The same is true of members of Civic Progress (now known as Greater St. Louis, Inc.).

42. At the time Page told Plaintiff about the comment by one or two members of the St. Louis Police Foundation, he was struggling to get campaign donations for his campaign for the County Executive position.

43. On February 23, 2020, Page asked Plaintiff to speak to Shamed Dogan, a member of the Missouri House of Representatives and the Missouri Black Caucus, to ask whether Dogan could get his donors to make financial contributions to Page's campaign.

44. Plaintiff applied for the Chief of Police position on March 10, 2020.

45. The last time prior to 2020 when the Chief of Police position was vacant, candidates were required to hold the rank of Lieutenant Colonel to be eligible to apply for the position. Plaintiff did not apply for the position at that time because he held the rank of Captain.

46. In 2020, when the Chief of Police position was going to become vacant, Plaintiff held the rank of Lieutenant Colonel. At that time, the Board changed the qualifications to allow candidates with the rank of Captain or above to apply for the Chief of Police position.

47. Plaintiff had one interview with the Board for the Chief of Police position, which lasted approximately twenty minutes.

48. On March 19, 2020, the Board announced that Captain Mary Barton (Caucasian) had been selected as the next Chief of Police for the St. Louis County Police Department.

49. Plaintiff was more qualified, and continues to be more qualified, than Barton for

the Chief of Police position.

50. Upon information and belief, Page and/or individual members of the St. Louis Police Foundation and/or individual members of Civic Progress exerted influence on the Board and/or some of its members to oppose Plaintiff's appointment to the Chief of Police position and to advocate for the selection of a white person. Plaintiff's race was the motivating factor in the decision to exert this influence.

51. Upon information and belief, Page exerted influence on the Board, in part, based on his fear that he would not receive campaign contributions from large corporate donors if the Board appointed a black Chief of Police.

52. Upon information and belief, a white member of the Board stated, when discussing Plaintiff's candidacy for the Chief of Police position, that Defendant did not "need" a black Chief of Police.

53. After the Board selected Mary Barton as Chief of Police, one or more large corporations in St. Louis, or their political action committees, began making large financial contributions to Page's campaign.

54. Plaintiff's race and/or his opposition to racially discriminatory conduct within the St. Louis County Police Department was the motivating factor in Defendant's decision not to select him for the Chief of Police position.

55. After Defendant failed to select Plaintiff for the Chief of Police position, Page attempted to offer Plaintiff several positions in the St. Louis County government. In addition, Winston Calvert, Page's Chief of Staff, spoke to Plaintiff about creating a job for Plaintiff as Public Safety Director, a position which did not exist at the time. Plaintiff was not interested in these efforts and perceived these overtures to be an effort to buy him off.



56. After Defendant failed to select Plaintiff for the Chief of Police position, Plaintiff received a telephone call from William Ray Price, the Chair of the Board. Price asked Plaintiff to serve as the liaison for the St. Louis County Police Department with Teneo, a consulting group which was responsible for conducting a top-to-bottom review of the Police Department. While Plaintiff was considering this offer, he received a call from Page, who urged Plaintiff to accept the position as liaison. When Plaintiff stated that he was not sure the Board would approve Plaintiff for the position, Page replied that the Police Board does what he tells them to do.

57. Plaintiff agreed to accept the liaison position. After Plaintiff told Page that he would accept the position, Page told Plaintiff that he could not “wait to see the faces of the two Civic guys” who asked Page what he was “going to do about the black guy” and who hoped Page “didn’t make him Chief.”

58. Defendant’s actions toward Plaintiff, as described herein, constitute discrimination because of race, in violation of Mo. Rev. Stat. § 213.055, and retaliation for Plaintiff’s opposition to Defendant’s discriminatory practices, in violation of Mo. Rev. Stat. § 213.070.

59. Defendant’s actions toward Plaintiff, as described herein, are part of a pattern of racially discriminatory decisions and actions within the St. Louis County Police Department.

60. On July 24, 2020, Plaintiff filed a charge of discrimination against Defendant with the Missouri Commission on Human Rights (“MCHR”), charge number FE-7/20-32085, alleging discrimination based on race and retaliation.

61. On January 22, 2021, the MCHR issued a Notice of Right to Sue to Plaintiff for charge number FE-7/20-32085, allowing him to bring this action against Defendant. A copy of the Notice of Right to Sue is attached hereto as Exhibit 1.

62. Plaintiff has filed this action against Defendant within 90 days of the issuance of

the Notice of Right to Sue and within two years of the discriminatory and retaliatory actions alleged herein.

63. As a result of Defendant's actions as alleged herein, Plaintiff has sustained and will continue to sustain lost wages and benefits of employment. In addition, Plaintiff's future earning capacity has been substantially diminished.

64. As a further result of Defendant's actions as alleged herein, Plaintiff has suffered emotional distress, humiliation, embarrassment, mental anguish and suffering, and loss of enjoyment of life.

65. As a further result of Defendant's actions as alleged herein, Plaintiff has incurred and will continue to incur attorneys' fees and costs of litigation.

WHEREFORE, Plaintiff prays that the Court, after trial by jury, enter judgment in his favor and against Defendant, in amounts to be determined at trial, for past and future economic losses, including prejudgment interest; for compensatory damages, including damages for emotional distress; for injunctive relief to prohibit Defendant from engaging in further discriminatory and retaliatory employment practices; for attorneys' fees and costs of litigation; and for such further relief as the Court deems just and proper.

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