

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.

