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JEFFERSON CIRCUIT COURT

DIVISION WHAS

SAMANTHA RICKETTS

PLAINTIFFS

VS.

VERIFIED COMPLAINT

LOUISVILLE METRO GOVERNMENT

DEFENDANT

SERVE: Mayor Craig Greenberg
Louisville Metro Hall
527 West Jefferson Street
Louisville, KY 40202-2814

* * * * *

Comes now the Plaintiff, Samantha Ricketts by and through counsel, and for her Verified Complaint against the Defendant, Louisville Metro Government, states as follows:

1. Jurisdiction and venue are proper in this Court as all the actions complained of occurred in Jefferson County, Kentucky.
2. The amount in controversy exceeds the minimal jurisdictional amount for this Court.
3. At all times relevant hereto, Plaintiff Samantha Ricketts is an "employee" of the defendant Louisville Metro Government (LMG) pursuant to KRS 61.101(2).
4. At all times relevant hereto, Defendant Louisville Metro Government (LMG) was an employer under KRS 61.101(2).

FACTS

5. Plaintiff Ricketts was employed as a Graphic Specialist under former Mayor Greg Fischer and was retained in that position by Mayor Craig Greenberg.

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6. Immediately upon the change of administrations, Mayor Greenberg's wife, known as the "First Lady," Rachel Greenberg assumed duties within Defendant LMG. (See Exhibit 1, "Office of the Mayor's contact List.")

7. First Lady Rachel Greenberg immediately began to give Plaintiff Ricketts orders and tasks which were not part of Plaintiff Ricketts' job description.

8. These orders are laid out in detail in Plaintiff Ricketts' timeline attached hereto and made a part hereof by reference, pages 1-19. (Ex. 2)

9. Plaintiff Ricketts believed First Lady Rachel Greenberg's action violated the LMG Ethics Code, when the First Lady gave Plaintiff Ricketts direct orders to perform certain tasks detailed in the attached timeline.

10. Plaintiff Ricketts reported her concerns to LMG Director of Communications Matt Erwin.

11. Mr. Erwin tells Plaintiff Ricketts he will relay her concerns to the "fourth floor," a euphemistic reference to the Mayor's office location.

12. Plaintiff Ricketts' report to Mr. Erwin constitutes a report of an actual or suspected violation of LMG's Ethics Code pursuant to KRS 61.102(1).

13. Thereafter, Plaintiff Ricketts was terminated from her employment by LMG as indicated in her timeline.

ADDITIONAL FACTS

14. On December 14, 2023, Mayor Craig Greenberg filed a Motion to Dismiss the ethics complaint which had been filed against him.

15. The Motion was signed under oath by Mayor Greenberg on December 14, 2023. (Ex. 3)

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16. The Motion contains the following language:

With regard to staff, no Mayor’s Office staff and no Louisville Metro Government employees have ever reported to Rachel. Like the other Louisville Metro Government volunteers described above, Rachel interacts with employees of Louisville Metro Government in connection with her volunteer efforts on behalf of the Mayor, but she does not have any staff or individuals who report to her. For example, soon after the Mayor took office, with the Mayor’s knowledge, Rachel and others interacted with members of the mayor’s Office regarding the graphic design for Mayor’s Office business cards and stationery and for a new logo for the Y’ALL program, but all staff supervision for this work was performed by the respective direct supervisors in the Communications Department or by Deputy Mayor Barbara Sexton Smith, and Rachel made no substantive decisions.

Defendant’s Motion to Dismiss, pp. 6-7

17. These statements under oath are false.

18. First Lady Rachel Greenberg did make “substantive decisions” and gave instructions directly to Plaintiff Ricketts.

COUNT I

VIOLATION OF THE KENTUCKY WHISTLEBLOWER ACT (KWA), KRS 61.101, ET SEQ.

19. Plaintiff hereby incorporates and reiterates paragraphs 1-18 above just as if fully set out here below.

20. The actions of LMG violate the KWA in that Plaintiff Ricketts’ employment as Graphic Specialist was terminated following her reporting actual or suspected violations of LMG Ethics Code to appropriate authority.

WHEREFORE, the Plaintiff demands the following:

1. That she be awarded compensatory damages against the Defendant for lost wages.
2. That she be awarded punitive damages.

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- 3. For injunctive relief.
- 4. For her costs and expenses herein incurred, including reasonable attorneys' fees.
- 5. For a trial by jury on all issues so triable; and
- 6. For such other relief as she may appear entitled.

WHAS

Respectfully Submitted,

/s/ Thomas E. Clay

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Counsel for Plaintiff

Presiding Judge: HON. TRACY E. DAVIS (630452)

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VERIFICATION

I, Samantha Ricketts, state that I have read the foregoing Verified Complaints and the statements contained therein are true to the best of my knowledge and belief. ^{WHAS}

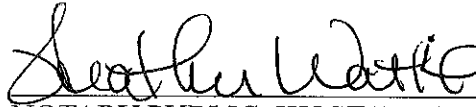


SAMANTHA RICKETTS

State of Kentucky)
) SS
County of Jefferson)

Subscribed and sworn to before me by Samantha Ricketts on this 14th day of February 2024 to be her free act and voluntary deed.

My commission expires: 7-27-2026.



NOTARY PUBLIC, KY STATE AT LARGE
KYNP: 54943

Presiding Judge: HON. TRACY E. DAVIS (630452)

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