

253rd DISTRICT COURT
LIBERTY COUNTY COURTHOUSE

NO. 24DC-CV-01313

THOMAS W EVERETT)
PLAINTIFF)

IN THE DISTRICT COURT

VS.)

CLEVELAND ISD, STEPHEN McCANLESS
CODY COX, JANIS RIOS, GEORGIA
TAYLOR, LINDSAY BERGEN ,)
DEFENDANTS)

LIBERTY COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff files this original petition in the above-styled and numbered cause, and in support, shows the Court as follows:

I. DISCOVERY

1. Plaintiff intends to conduct discovery under Level 1.

II. PARTIES

2. THOMAS W EVERETT, Plaintiff, was employed in Liberty County of this Court, within Texas.
3. 1970-1971 I was a senior in high school working at the Exxon station. We had a scanner, and I heard that a hit and

run had occurred on HWY 105 around Midway Tx. I got the description of the car and when it came over to the Dairy Mart, I blocked them in, and the law came arrested them. Harris (Red) Blanchett Pct 2 JP in Shepherd today was a Rooky Highway Patrol at that time. I went to West Hills Junior College and there I was asked to be the Police Officer on Campus. I also had to act as an attorney. I later worked for J.C. (Humpy) Parker as a Reserve Deputy Sheriff. The department was investigated three or four time by the Federal Government. For water torcher and other illegal issues. I saw the water torcher one time and immediately went to officer Blanchett and told him about it. There were 32 deputies, and I was one of the seven that did not get in any trouble. I later retired from law enforcement and started driving a school bus. Was given a minister's license with United Pentecostal Church International. Worked for Shepherd ISD and then Cleveland ISD as a bus driver from March 8, 2023, to April 11, 2024. I was asked by Tanya Clark to return to Lamar and start finishing my BS degree. So, I did as I was asked. I am also an Air Force Veteran. Went to Viet Nam in November 1972.

1. CLEVELAND ISD, STEPHEN McCANLESS, JANIS RIOS, GEORGIA TAYLOR, and LINDSAY BERGEN, Defendants, may be served at the following address:
1901 E. Houston St. Cleveland, Tx 77327.

2. Cody Cox Defendant, may be served at the following address:

810 Old Greenville Rd., Royse City, Tx 75189

III. JURISDICTION AND VENUE

3. The amount in controversy is (\$5,000,000.00) within the jurisdictional limits of this District Court, and venue is proper as the cause of action arose in the county of this Court within Texas.

IV. FACTS

4. Plaintiff I went to work as a substitute teacher for Cleveland ISD from Jan 2023 to March 8, 2023. March 8, 2023, I started driving a school bus. At the beginning of school July 2023, while signing up for insurance, I was asked to go back to college and finish my BS degree. So, I started talking to Lamar University. In January 2024 Cleveland Administration Department directed me to Grand Canon University. We worked together until I wanted to pay using Hazlewood Act (military benefits). Then I was told to go back to Lamar. So, I did.
5. I was scheduled to participate in a Bus Road-e-o and began practicing. March 6, 2024, I won third place in the Local Bus Road-e-o. Monette Garcia won first and Tamarynn Wall won second place. Next the Regional at Cypress Fairbank ISD. March 22, 2024, I was working on

the Parallel Parking event, Monette and Tamarynn came to where I was. Monette said that Megan Elsberry (Road-e-o Director) said that she would set up the Back Up Stall Event. But she just sits there. I said, "Well it's like she doesn't want us to win." After about an hour they went back in and then came back out and Monette said, "it's like you said they don't want us to win".

6. March 23, 2024, I participated in a Bus Road-e-o at Cypress Fairbank ISD. We started out by taking a test on the computers. I went to the restroom and when I came out, I was escorted to the room where the others had already started taking the written test. They could not get the computer to work. I had my I pad on the bus, and they asked me to go outside and get it. So, I went and got it. The other constantans were about half finish when I got started taking my test. When I finished, they took me out to the bus. I was the last one to get on the bus and was sitting in the very back about seat 21. We took a drive around the course with Jack explaining each event. I was in the back of the bus and could not hear. Other driver contestants were standing up and blocking the sound. My hearing aids were broke, and the VA said they are not going to fix them because they are 20 years old. I was given an appointment (6/04/24 2 PM) to get new ones. So, I asked Jack if he would use the microphone, and he stated that he should have used it from the beginning, he started using it at the sixth event. When we finished the drive around, they rushed us into the holding room. Where we waited until our turn to drive the course. I sat down by Crystal Becerra and Misleidydis Tase and we were talking. I was there about maybe two minutes when Tamarynn called my name and told me to move over to where she was. She was in the back of the room. She talked me into moving. So, I got up and moved to her table. There were only four chairs

there. On the other side of Tamarynn was one chair. Two ladies from another district occupied two of the chairs sitting across from each other. Tamarynn was getting us to sit with her and we would be crowding them. When I got up and moved over there, Monique came in and I called her name, and she looked at me. I told her "We are over here". Then I noticed there was not a chair for her at our table. I told her to get one at that table and put it over here. The lady on the opposite side of the table from Tamarynn said "that is okay we will just move over to another table, we have more coming in our group. She can have my Chair." The two ladies did get up and move. When it came my turn to drive the course, I did not know what to do on the fourth events. I could not see the Stop Sign because Lindsay Bergen was standing in front of it. When I came to it, I drove around to the left just like the drive around went (see Exhibit H). It was a Stop Line event just pull up to the line and stop set the brake and put it in neutral. When I got even with the Stop Line, I stop the same place the tour bus stopped, and looked over where the Judges were, and Lindsay Bergen was one of them. She put her arms out as if to say, what are you doing? I opened the door and said, "I don't know what to do, because I couldn't hear Jack when he explained the course." She told me it was the Stop Line event. I turned around making a figure 8 and drove up to the line and stopped and then went on. I knew that I didn't get a score on this one and it was the easiest one. I did know what the others were because Jack used the microphone. I tried the others but was upset about the Stop Line event and did not do well at all. When I returned, the other constantans asked me. How did I do on the Back Up Stall Event? My respond was "Well I helped you, meaning that I did bad, and we all laugh about it. Monette took her turn, and she completed all events but said she skipped the

Back Up Stall Event. (this is the event that Megan never set up for us to practice). This upset Tamarynn and she started crying. Monette said that Tamarynn was having an anxiety attack. Monette did her best to comfort Tamarynn. After Tamarynn finished her course, she came in where we were sitting and waiting. She was right behind me when she said, "Just like you said Thomas they did not want us to win". All events were set up opposite of the actual Cypress Fairbank ISD Road-e-o. Megan help set it all up and knew each event.

7. March 27, 2024, I was called into Janis Rios' office. I was told that a complaint from another school district had been received. It said " that I was acting unprofessionally, was loud, made two ladies move to another table, made Tamarynn cry, refused to participate in the Back Up Stall Event, and said, they don't want us to win. My supervisor Dawn Poole was in the room at the time.
8. Because of this document I was put on a 15-day Gag Order" by Janis Rios. They refused to let me see the document. I was told I could not talk to anyone about the complaint, not even my wife
9. April 1, 2024, I went home and wrote a rebuttal to the complaint. Addressed to Janis Rios and Cleveland ISD. In this document I didn't have the correct spelling of Monette (Monique) Garcia's name.

1. EXHIBIT A

Cleveland ISD
Transportation Dept

April 1, 2024

Janie Rios

I Thomas W Everett would like to address the complaint against me by someone from another district on or about March 23, 2024. On this day there was a FUN event put on by Gulf Coast Association for Pupil Transportation. Called a Road-e-o. I will address each from the beginning to the end.

The complaint said that:

1. That they believe I was unprofessional at the Road-e-o because:

1. That I was loud, ,
2. Because of me being loud others moved to another table,
3. I said that "they did not want us to win,"
4. I did not do the Backup event,
5. I said that Jack did not explain the course plain enough,
6. I made Tamarynn cry.

I will start from the time we got on the bus March 23, 2024, at about 5:00 A.M. I went to the back of the bus so I could take a nap (I did not go to sleep). We got there and got off the bus and went into the building to a large room. I needed to go to the restroom and that made me the last one to start my test and then they could not get the computer to work. I told them that I had my tablet on the bus. They asked me "If I would please go get it? So, I did, and this made me even more behind.

I finished the test and later we got on a bus. I was in the back of the bus because everyone wanted to sit in the front. Jack drove around the course and explained each event. After several events I decided to ask Jack to use the mic. He laughed and said, "I am sorry, I should have been using it from the beginning." When we got back, we went into another room much smaller. This was the staging room for the driver. During this transition I went to the restroom again. One of the workers took me and showed me where the restroom was and then to me to the Staging room.

Crystal Becerra and Misleydis Tase went in and sat at a table (straight in front of the door.) When I got there, I sat down next to Crystal and was talking. I was there about maybe five minutes when Tamarynn called my name and told us to move over to where she was. She talked me into moving. So, I got up and moved to her table. There were four chairs there and on the other side of Tamarynn was a lady from another district. Across from her was another lady from the same district. They occupied two of the chairs. Tamarynn was getting us to sit with her and we would be crowding them. When I got up and moved over there, Monique came in and there was not a chair for her at our table. The lady on the opposite side of the table from Tamarynn said "that is okay we will just move over to another table. She can have my Chair." The two ladies did get up and move because they had more drivers in their district. (Not because I was loud.) I have not even sat down yet. Monique got a chair and sat down, I guess.

I asked Tamarynn if she wanted to look at the vendors' products and she told me she was broke and did not have any money. I said, "you make good money and should not be broke." She said, "she lives with her mother and has to stay in the parking lot most of the time. She has to pay \$200.00 a month rent." I asked her why she was broke then? Her reply was "she eats out all the time and that makes her broke". Her face got really red, so I figured she was going through a rough time at

home. I felt that she wanted me to give her some money by our conversation: I got away from that conversation very quickly.

I got up and started looking at the vendors' products that was for sale.

I decided to buy a ID holder for each one of the girls (Tamarynn, Crystal, Monique, and Misleydis) that you pull out and it roles back up when you let it go. I went back to our table, and I asked Tamarynn and told them to come and let me buy them the holder. I did not ask Crystal and Misleydis at this time. However, I decided to buy my wife a T shirt. I called Crystal and Misleydis and I told them I wanted to buy them the holder also. So, they came over and I bought them the holder. I later bought my wife two T Shirts.

My number was 29 so I was called before Monique or Tamarynn. The drivers I am not sure because they were at another table and with the SPED driver group.

They called for me and I got up and went with the one that called my name. I began to drive the course and came to the Stop Line (I did not remember what we were told to do. My mind just went blank.) I should have known by reading the sign. I did terrible as the score will show. When I came to the Backup event I should have stopped and examined it longer, but I just did the best that I could, I did back all the way into the lane, crossed a line or two. But I did try.

When I got back into the room people were asking me how I did and did I do the Backup event. I made the remark that I have been driving for many years and I could not do the Backup event. •I don't see how anyone can do it. When I was asked again, my reply was "Well I helped you. " Meaning that I did terrible. I began telling Monique and Tamarynn about the course and I made the remark that I didn't remember Jack saying anything about the Stop Line or I could not hear him. Monique snapped at me and said that he did. (I am sure he did but I could not hear him.) Tamarynn started crying by this time. Monique told her, "Wipe your eyes, you can do it". I think Monique went next and then Tamarynn.

When Tamarynn got back she told us that she did not even try to do the Backup event. She made the remark that "they did not want us to win". When all had finished, they took us into the Award room. We ate lunch and during this time, I asked for water bottle caps. I did talk where they all could hear me.

They called each participant and gave them a Certificate. When they called my name, I said very loudly "YEEHAW". This was a western event, and we were having fun. We loaded up and came back to Cleveland. Not one time did I say, "they did not want us to win".

This was not at the Road-e-o

Now let me address the issue that I said, "they did not want us to win". I never said those exact words. I practiced every day the week leading up the Road-e-o. I wanted to win. We all should want to win. On Tuesday when I got on the bus for the first time that day the bus was at the straight-line event. Monette was driving and Tamarynn was in the front seat next to the door. When I got in, I said, "I don't know about riding with two women". Tamarynn made the statement "well it won't take much to get me started". I wasn't sure what she was talking about. However, I stayed away from her from that point. We did practice but she didn't participate much.

On Thursday I started practicing on the Parking event. About 9:30 AM Monette and Tamarynn came out to the Parallel Parking area.

Monette told me, "Megan will set up the other event about 10:00 O'clock." I got out of the bus so they could practice. They both Parallel Parked very well. They got out and turned it back to me. They walked back to the building.

About 11 AM they came out and said that Megan was going to get Melissa, but no one had set it up yet. I made the remark

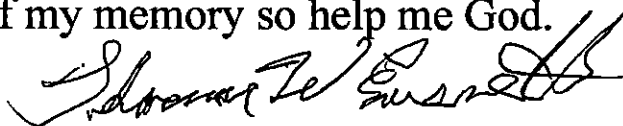
"it's like they don't want us to win." (I did not say they don't want us to win.)

About 12:00 (O'clock they had checked with Megan, and no one was going to set it up. Monette and Tamarynn came out and told me the news. Monette made the remark "I guess „your right, they don't want us to win. "

Dawn Poole came out and tried to help us set up the Backup event. However, we could not really set it up at the Center because there is not enough room to set it up 100%. This is probably the reason Megan did not set it up, (plus she had a lot on her plate to get done and she is the Chairperson over the Road-e-o.) We backed up into the area one time and then called it the end of practice.

I have covered every issue that I can remember. When I talked to Janie Rios during this investigation. I was shocked that someone from another district knew so much about Monette, Tamarynn and I's conversations. I believe this was another lie. How could they know unless one of the three of us told them. If they did, then they are unprofessional and should be the person investigated. However, when I was questioned there were things I did not recall. I do want to say this. When I was asking about saying "they did not want us to win My response was "well they did not set up the event that they said they would set up. " Whoever filed this complaint should read this. So, they would know the truth.

This is the truth to the best of my memory so help me God.



Thomas W Everett

55 Spring Creek Dr.
Shepherd, TX 79371
936 391 6431

April 11, 2024, I was told to meet with Janis Rios in Dawn Poole's office at 1:15 PM. There she told me that I had to sign a Gag Order. I asked her what if I didn't sign it. She informed me that I would not have a job. Her remarks were "then this is as far as you can go". She started reading the Gag Order and it said that I could not talk to anyone for 365 days about this issue. I cannot participate in any Bus Road-E-O or go to any school event or trips. I told her I was not going to sign the Gag Order, and I would quit first. Dawn already had the form on her computer screen. She got up and told me to sit down and fill out the form. I filled it out and where it asked why I was leaving, I wrote "I am tired of being lied on."

Exhibit B

Employee Resignation Form

Sent By:

Completed By: Public User

Sent On: 4/11/2024 1:18pm

Completed: 4/11/2024 1:25pm

CLEVELAND INDEPENDENT SCHOOL DISTRICT

Employee Resignation/Retirement Notice Form

First Name:

Thomas

Last Name:

Everett 6 X P IQ

Employee ID Number:

Date of Birth:

04/07/1953

Position:

driver

Department/Campus:

Transportation

* Request Type:

Resignation

* Last Date to Work:

04/1 1/2024

Please enter your last day to work. If your intention is to resign/retire at the end of your work calendar, please enter the last work date from your work calendar, If you are unsure of the date, please contact Human Resources at 281-592-8717 prior to submitting this form.

* Reason for Resignation/Retirement: X Other Employment

Additional Comments:

tired of being lied on.

This letter shall serve as official notice to the Cleveland Independent School District for my resignation and/or retirement. By signing this document I acknowledge the following:

- * I understand that my decision to resign or retire is irrevocable and may not be retracted once submitted.
- * It is my responsibility to return all district property immediately upon notification of release.
- * I understand that my employee benefits will cease on the last day of the month that I am resigning or I have completed my duty calendar for this school year and my benefits will cease at the end of my pay cycle on:
 - * 12 Month Employees: June 30th of the current school year
 - * 11 Month Employees: July 31st of the current school year
 - * 10 Month Employees: August 3 1st of the current school year

Exempt Employees: This resignation or retirement notice must be submitted and filed no later than the 45th day before the first day of instruction for the following school year. If submitted outside of this time frame, you must request a release from contract approval from Human Resources.

I agree and understand that by signing this form electronically that my signature is considered the legal equivalent of my manual/handwritten signature and I consent to be legally bound to this agreement. You must sign this form using your full legal name.

X	Signed: Thomas W Everett Stamped: 4/11/2024 1:25:14 PM; 192.24.97.167;
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Generated at 4/11/2024

PM Central

Page 1 of 1

The document was marked that I had another Job. I didn't see this until I had gone home. I did not mark this

I went to the Administrations building and applied to be a substitute teacher. The Director over Transportation Cody Cox came and talked to me and he did not even know what a Gag Order was. He also said that four or five people came to him and complained about me.

April 20, 2024, I talked with the Human Resource Executive Director Rodrigo Cano. I asked him to investigate the matter. He gave me his word that he would.

April 21, 2024, Mr. Cano told me "There is a complaint against you, I saw it and I can tell you it came from Cypress Fairbank ISD".

April 21, 2024, now that several days have passed, I am hearing that Monette and Tamarynn were forced to sign a complaint against me.

April 30, 2024, I went to Mccanless and complained about the Gag Order and about resigning. He told me several times (at least 5 times) that I should be teaching school for him. I showed him my TSI scores where I had just completed the test to reenter Lamar University. I had been asked by Tonya Clark to "go back to school and work on

completing my degree and they (Cleveland ISD) might put me in a classroom as a teacher”.

May 6, 2024. Cody Cox sent a text to transportation employees stating that he had resigned and was leaving.

May 23, 2024, I called Cypress Fairbanks School and talked to Jessica Price Manager, transportation Training and Compliance. I told her about the Complaint, and she said that she remembered me from the Road-e-o event. She said that she did not file a complaint but give her some time and she would get back to me.

May 31, 2024. Mrs. Price called me and informed me that no complaint came from Cypress Fairbanks ISD. I asked her to send me an email stating that. She said that she would.

Exhibit C

HOME MAIL NEWS FINANCE SPORTS ENTERTAINMENT LIFE SEARCH SHOPPING YAHOO PLUS MORE...

CLEVELAND-isd Search in cleveland-is Advanced

Compose Back Archive Move Delete Spam

yahoo!mail

Get quick takeaways

The new Yahoo Mail lets you see important info at the top of messages.

School Bus Rodeo Yahoo/CLEVELA...

J Jessica Price
From: jessica.price@cfisd.net
To: theeldereverett@yahoo.com
Fri, May 31 at 9:52 AM

Good morning Mr. Everett,

Per our conversation, I am sending this email correspondence to confirm that as the GCAPT Regular Ed Rodeo Chair I did not receive any complaints about you at this year's rodeo competition. However, complaints could have been received by the GCAPT President Elect, Mr. Cody Cox.

Thank you,

J Jessica Price
Manager, Transportation Training and Compliance
Cypress Fairbanks ISD
Jarvis Transportation Center
13330 Woods-Spillane Blvd.
Cypress, Texas 77429
Ph: 713-MY-CFBUS
Fax: 346-205-8455

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Reply, Reply All or Forward

Got it. Received, thank you. Received.

J Jessica Price
jessica.price@cfisd.net
Add to contacts

Dr. Phil
He's Back!
More Than Ever,
America Needs Dr. Phil
8/7 p c
Find Channel

MORNING
Real people.
Real news.
Really fun.
8/7 a c
Find Channel

May 31, 2024. I began taking my first class with Lamar University.

Exhibit D

5/20/24, 3:38 PM

Student Information

General Student Record

L20055526 Thomas W. Everett
Summer 2024
May 20, 2024 03:21 pm

Student Information effective from Summer 2024 to The End of Time

Registered for Term: Yes
First Term Attended: Fall 1988
Last Term Attended: Fall 1990
Status: Active
Residence: Resident Tuition
Citizenship: Citizen
Student Type: Returning
Class: Junior
Primary Advisor: Joel M. Laningham
Expected Graduation Date: May 15, 2029
Expected Graduation Term: Spring 2029
Expected Graduation Year: 2028-2029

Curriculum Information

Current Program

Bachelor of Science

Level: Undergraduate
Program: BS in University Studies Multi
Admit Term: Summer 2024
Admit Type: Readmit Undergraduate Student
Catalog Term: Summer 2024
College: College of Arts and Sciences
Campus: Accelerated Programs
Major and Department: University Studies Multidiscip, Center General Studies Adv

RELEASE: 8.7.1

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https://ssborod.lamar.edu/btdb/bwskastu.P_StuInfo

1/1

July 16, 2024, I received an e-mail from the human Resources department telling me the school district will not move forward with processing my application.

Exhibit E

Position Inquiry

From: Human Resources (humanresources@clevelandisd.org)

To: theeldereverett@yahoo.com

Date: Tuesday, July 16, 2024 at 04:36 PM CDT

Mr. Everett,

Thank you for your interest in Cleveland ISD. At this time, the district will not move forward with processing your application. We wish you the best in your future endeavors.

Sincerely,
Human Resources



HUMAN RESOURCES

Cleveland Independent School District
✉ humanresources@clevelandisd.org
☎ 281.592.8717
📍 1901 E. Houston St.
Cleveland, TX 77327
🌐 www.clevelandisd.org

Summer Hours: Mon - Thurs 7:00 a.m. - 5:00 p.m.

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July 12, 2024, went to VA in Humble because I was not feeling good. They would not let me leave until a EKG was done. Then

they told me I had started having a heart problem and was being sent to the VA in Houston. The VA set me up with test in Houston August 06, 2024, Livingston Hospital August 30, 2024.

Exhibit F

100031983826



Department of Veterans Affairs
Office of Finance
Payment Operations

September 7, 2024

L8714-2-0013052 P003 T00033 00013052 1 AB 0.593

Claim ID. 302425000121607000

THOMAS EVERETT
SPRING CREEK DR
SHEPHERD, TX 77371-2555



Dear THOMAS EVERETT

VA has reviewed the above-referenced claim ID that was received on 09/05/2024. Your claim could not be processed due to missing information or improper claim submission to the VA. The explanation(s) for the claim rejection is listed at the end of this letter and correlate to the Rejection Code(s) found in the Claim Details section below.

CLAIM DETAILS

Provider: MEMORIAL HOSPITAL OF POLK COUNTY
Patient Control Number: 0300649012-0001
Claim Dates: 08/30/2024 - 08/30/2024
Billed Amount: \$6,363.78

THIS IS NOT A BILL

Service Start Date	Service Code	Service Description	Rejection Code
08/30/2024	93306	TTE W/DOPPLER COMPLETE	

Entire Claim : 23026

ServiceDescription

REJECTION REASON(S)

Your claim could not be processed for the following reasons.

- 23026: We are unable to process this claim as services were referred or coordinated by a CCN Contractor. Please submit claim to the contractor specified in the authorization or contract.

WHAT HAPPENS NEXT

The above-named provider, who submitted this claim to the VA on your behalf, has been notified of this claim rejection. In many instances, the provider will take action to remedy this rejection. However, any information that is required to process your claim must be received within one year from the date on this letter. VA must consider all information and evidence provided to support your claim and we must make all reasonable efforts to assist you in getting missing evidence. We recommend that you track this claim until you receive a final VA decision letter.

July 25, 2024, I received my new hearing aids from the VA.

Sept 17, 2024, we had another Unemployment Hearing I received from the school the complaints from Tamarynn Wall and Monette Garcia and a statement from Janis Rios. I asked if this was the original complaint against me. I was told yes, by Mr. Cano.

Exhibit G

Disciplinary Meeting with: Thomas Everett

Date: 4/11/2024 Time: 1:15 pm

Location : Dawn's Office / CISD Service

Center Attending:

Janie Rios - Assistant Director Safety and Training

Dawn Poole Driver Coordinator

Thomas Everett Driver

Mr. Everett arrived at 1:15 pm. I said good afternoon Mr. Everett, how are you doing today?' Mr. Everett had no response to my question. I then asked him to have a seat and he did. I told him I was going to go over the findings of the investigation and let him know what his directives would be pertaining to this event. I read him the document that states the consequences for his actions during the school bus Roadblock. As soon as I finished reading Mr. Everett stood up and ripped his badge off of his shirt and in a loud voice told me, 'you are a liar and I don't have to take this, Why is everyone lying on me?' Mr Everett threw his badge down on the desk and said that " it's fine I'll just resign. I am not going to work somewhere where people can lie on me." Dawn Poole said ok Mr. Everett if you want to resign come over here and fill out the online resignation. Mr Everett was filling out his online resignation with Dawn's help. He kept asking If he could do it at home. Dawn continually told him no sir I am sorry you have to do it here in front of us. While Mr Everett was filling out his resignation, I told him "Mr. Everett if this is what you choose to do, that is your right however no one is telling lies about you. This has been a lengthy investigation, we were approached not only by our own district but other districts as well, why would they have any reason at all to lie about you'? He was just mad and kept telling me you're a liar. I want to see my paperwork, I want to know what was said and who they said it to I told Mr Everett, "I am sorry but I am not

allowed to share the information with you." However it was more than us or just one person, Mr. Everett said I know who it was, it was Tamarynn and I didn't make her cry she was already crying, He continued telling me that we are liars and that I am lying about him. I told Mr. Everett I have absolutely no reason to lie about you sir, I am just reporting the facts and findings and the consequences to you. He stated again well I am not taking this shit. You're a liar. He said once again I want to know who caned and who they talked to? told him I am not at liberty to share that information with you, I then told Mr. Everett before he was to leave, that I needed to give him some more information. I told him if for some reason you decide to stay or whatever may be. " I am giving you a verbal warning. You are not to intimidate, gesture at or harass any of the employees that you think had something to do with this." "You have been seen being aggressive with your body language to certain employees. Mr Everett then stated that's a lie! I have not harassed anyone. t stated again, Mr. Everett, it has been seen and reported. " I am letting you know that this behavior will not happen again and if it does it will lead to more consequences including termination." He just got up from Dawn's computer and said "you're a liar and so is everyone that he had not said anything, I don't have to take this." I said ok Mr. Everett, He walked out the door.

About 2 minutes after Mr. Everett left, his wife came in and said that she needed to put in her resignation, she did not like the way her husband was being treated and she cried. She filled out

Exhibit G-5

matthew.bieniek@clevelandisd.org

From: Janie Rios <janie.rios@clevelandisd.org>
Sent: Wednesday, March 27, 2024 12:30 PM
To: Tamarynn Wall
Subject: Re: Statement

Thank you!

Respectfully,

Janie P. Rios

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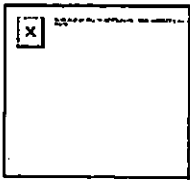
&

Tra

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ng

janie.rios@clevelandisd.org



Office: 281.592.2618 ext. 1369 **EXHIBIT G-5**

On Wed, Mar 27, 2024 at 11:38 AM Tamarynn Wall
<tamarynn.wall@clevelandisd.org>wrote:

Here's my statement,

While we were at bus rodeo regionals taking the written exam part, after we were waiting on others to complete the test and to move on to the next events, Thomas Everett began talking to another bus driver from another district. He

was talking mess about Cleveland isd. He said our supervisors dont care to help us but want us to win. He said we weren't taught anything we needed to know for competition. He also made Monette cry. I'm not sure exactly what w; said because I wasn't there but when I seen Monette crying I helped calmed her down and be a friend to her. At practices he has told other competitors that we have to listen to him because he is older than us. He would get mad a

me because I didn't do my events his way either but I learn how to do things a different way. Everyone learns differently. He just had nothing good to say. Also at competition he said the guy that drove us around to show us all t} events said nothing we needed to know and didn't talk about anything.

As for myself who did the same thing he did, we have amazing supervisors that would do anything they can to help us and answered all our questions. The man driving us at competition explained every event and answered every question. If a question was asked that he couldn't answer he just told us I can't answer that.

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Exhibit G-6

matthew.bieniek@clevelandisdoorg

From: Janie Rios
<janie.rios@clevelandisd.org>
Sent: Wednesday, March 27, 2024 11:02 AM
To: GEORGIA Taylor
Subject: Fwd: Statement
Respectfully,
Janie P. Rios
Assistant Director Safety & Training

janie.rios@clevelandisd.org

Office: 281.592.2618 ext. 1369

Office: 202.552.2618 ext. 1369

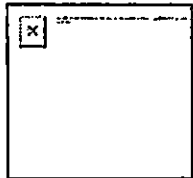


EXHIBIT G-6

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

From: Monette Garcia <monette.garcia@clevelandisd.org>

Date: wed, Mar 27, 2024 at 10:37 AM

Subject: Statement

To: Janie Rios <janie.rios@clevelandisd.org>

So the day of the regional rodeo everything was fine. Up until we were taking the computer test part of it. When we were done with it Thomas started talking to the man next to him about how the administration people who said were in charge of the rodeo was never there to help us or guide use He was saying other stuff but that when I turned to tell Tamarynn that he was saying things, and we just started talking to the competitor to the right of Tamarynn. Then when we did the bus ride through the events and when we were done, he so mad because he said they said a walk through and we didn't walk through it we went on the bus and that the driver did not explain nothing. I'm like yes he did he's lil he didn't use the mic I'm like yes he did and when he was done explaining everything he would say if we had any questions he's like no he didn't. He was just saying really bad things about that part. Then when it came to the changes oh my goodness he said we were told to parallel to the left and here is the right, we did right offset and here is left , the right turn and left turn. I told him just go along with it just change reference point on the opposite side, at this point I was over it, I was not wanting to hear him say

things anymore. When he came back from his turn he went on even more aggressive about the situation. One lady across the table from us was just looking at him and he was just saying negative stuff about everything and she got up and left. He was saying the same thing but blaming other why he was messing up and the back up alley was not even doable and that if he was not able to do it, it be harder for me since he had been driving for years and with a 18 wheeler and I just told him to stop because I had not yet gone and I wanted to enjoy it and he just kept going at it. After I was done I tried to just stay away from him for a while because I was so frustrated at this point and he came to me telling me if I did it I told him I didn't do the back up alley and he's like I didn't think so. I just looked at him and was like ok that is enough and walked away, I just started to cry because I got so mad at that point. From then on I hadn't spoke to him. In my personal opinion I feel we did everything we possibly could have we d our best but (feel my fun and excitement he took that from me. I still tried to make best with what was left of it thoughy

Sept 10, 2024, I submitted an Open Records Request form to Cleveland ISD. I received several copies of emails. I would like to share two with the court at this time. I would like to point out that this document was sent on Monday March 25, 2024,

Exhibit H-1

matthewabieniek@clevelandisdaorg

From: Lindsay Bergen
<lindsay.bergen@clevelandisd.org>
Sent: Monday, March 25, 2024 6:45 PM
To: Janie Rios
Subject: Regional Roadeo expectations

Good evening Ms. Janie, I am sending you this email in hopes to remain anonymous to anyone unnecessary. I do not like sending these emails but I feel I must to protect the integrity of our wonderful district.

This weekend I did witness some unprofessional behaviors in which I personally felt quite embarrassed myself.

Melissa seemed a bit too comfortable. I was judging reg stop line with Mrs. Gentry of Cy-fair, Melissa stopped by and visited and observed for a brief few minutes where she proceeded to use excessive profanity in front of my fellow judge. Also when a contestant got to the stop line, she yelled for them to stop as if she were training them. A couple of times had to tell her to calm down.

Thomas Everett was very flustered during his time to compete. As he approached my event, he swerved and opened his door yelling at me asking if the yellow rope was the stop line? I answered that I could not give any information. He got upset, closed his door and proceeded through the event without effort. Continued to make a circle at the back of their lot before skipping another event and driving unprofessionally and unsafely through the next.

When I got in line to make my plate, I noticed our two other reg. competitors were red faced and seemed upset, So I asked if they were ok? They both informed me that Mr. Everett said some very mean and hurtful things to them before the competition, I changed the subject quickly as to not have open discussions in that setting or with me but to report anything to their coordinators.

On a good note, I would very much appreciate if Mr. Julio would learn of how appreciative I am to him for his amazing efforts in making our rodeo an overall success. No matter the concern, he was there. Sign kept falling over, he put a rotor around the base to weigh it down. We needed a line, he installed a rope in the pavement. We needed water, he sent the wonderful snack crew. Anything we needed, he was there. Amazing job Mr. Julio of Cy-fair! (I hope I remembered his name correctly).

Lindsay

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Exhibit H-2

matthew.bieniek@clevelandisd.org

From: Cody Cox <cody.cox@clevelandisd.org>
From: Cody Cox <cody.cox@clevelandisd.org>
Sent: Thursday, April 11, 2024 6:55 AM
To: Janie Rios
cc: GEORGIA Taylor
Subject: Re: Meeting with Thomas Everett

Better remind her we're a witness and needs to shut her mouth.

Cody Cox

Director of transportation and Custodial Services Cleveland ISD

Sent from my iPhone

On Apr 11, 2024, at 6:39 AM, Janie Rios <janie.rios@clevelandisd.org> wrote:

Just and FYI I will be meeting with Thomas today at 1:15 pm in Dawn's office with Dawn present. As Soon as completed I will upload his information into his file. Thant<s

Respectfully,

Janie

P,

Rios

Assis

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janie.rios@clevelandisd.org

Office: 281.592.2618 ext. 1369

Oct 4, 2024, I visited with Jessica Price at Cypress Fairbank ISD and asked for a copy of the Road-e-o course. See Exhibit H.

Exhibit H

Jarvis Rodeo Setu



DIMINISHING CLEARANCE TEST

Contestant#

29

Event Judge

TINA & DANIEL

Exhibit H

Event—1a

Maximum Score

50 points

Demerits

0

Score Earned

50

DEMERITS

Each instance of jerky or uneven movement of bus

(2) (2) (2) (2) (2) (max of 10 demerits)

(2 demerits)

Each instance of stopping forward motion of bus

(4) (4) (4) (4) (4) (max of 20 demerits)

(4 demerits)

Each instance of bus touching flag tip

(10) (10) (10) (10) (10) (max of 50 demerits)

(10 demerits)

Bus strikes flag standard

(50 demerits)

Backing up bus during event

(50 demerits)

Failure to:

Complete the event

(50 demerits)

Wear Seat Belt

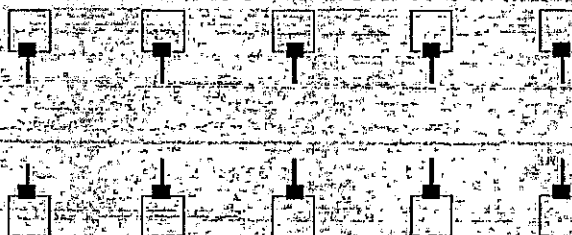
(50 demerits)

Keep door closed during event

(50 demerits)

Drive with headlights on

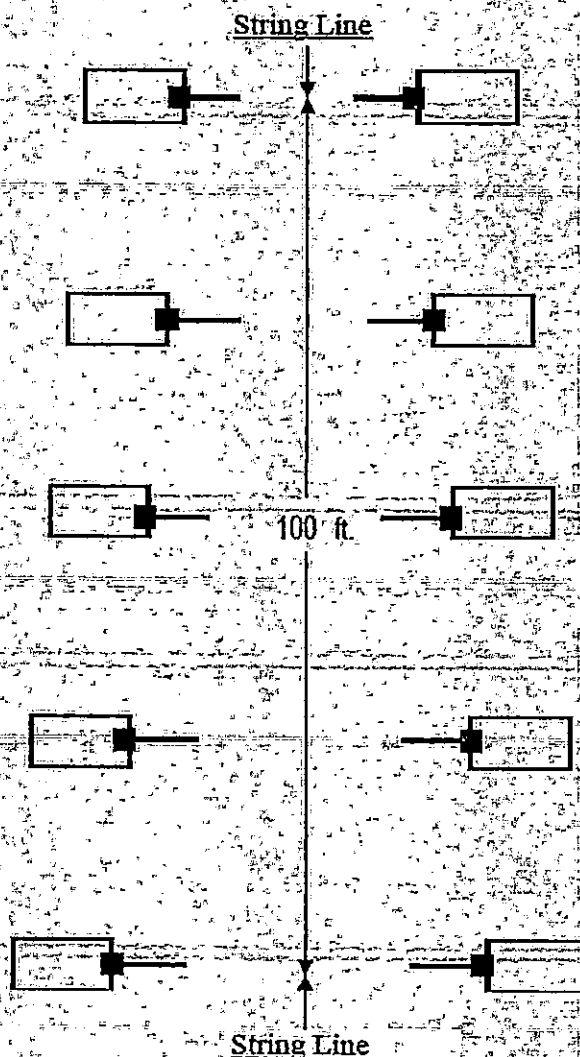
(50 demerits)



LAYOUT & DIRECTIONS:

Exhibit H Event—1b

1. Measure a distance of 100'
2. Mark the measurement at 25' intervals.
3. Place a straight line down with string. Stretch tight.
4. Secure width of buses to be used in competition. Consider rub rails, rubber around tire wells or any other object that will hit the standards such as mirror brackets, etc.
5. Determine the measurement to be used at each diminishing clearance standard.
6. Measure from the center line out to the end of the flag or standard on each side to equal the total measurement. To make sure the measurement is correct, use plumb bob from tip of flag to ground where measurement was made.
7. Do a visual check to make sure that you have a diminishing alley from the perspective of the contestant entering the offset.
8. Mark bases of the standards with crayons or chalk.



Setup Tools for Diminishing Clearance

- Heavy-duty claw hammer
- 1½ inch masonry nails (one box)
- One 50 ft. tape measure
- One 100 ft. tape measure
- One 1000 ft. roll of nylon string
- One box of yellow marker crayons
- Carpenter's Square
- Plumb bob
- 10 diminishing clearance standards w/flag arms (36" high minimum)
- Other

1 st pair of standards	With of bus plus 10 inches
2 nd pair of standards	With of bus plus 8 inches
3 rd pair of standards	With of bus plus 6 inches
4 th pair of standards	With of bus plus 4 inches
5 th pair of standards	With of bus plus 2 inches

Exhibit H
Event--2

STRAIGHT LINE TEST

Contestant# 29

Event Judge Allison

Maximum Score: 50 points
Demerits: 5
Score Earned: 45

DEMERITS

- | | | |
|---|---------------|-----------------------------|
| Each instance of jerky or uneven movement of bus
(2) (2) (2) (2) (2) (2) (2) (2) (2) (2) (max of 20 demerits) | (2 demerits) | <u> </u> |
| Each instance of stopping forward motion
(4) (4) (4) (4) (4) (max of 20 demerits) | (4 demerits) | <u> </u> |
| Each instance where wheel touches or knocks tennis ball off
(5) (5) (5) (5) (5) (5) (5) (5) (5) (5) (max of 50 demerits) | (5 demerits) | <u>5</u> |
| Drives to either side of pair of tennis ball markers
(10) (10) (10) (10) (10) (max of 50 demerits) | (10 demerits) | <u> </u> |
| Failure complete the event | (50 demerits) | <u> </u> |
| Failure wear seat belt | (50 demerits) | <u> </u> |
| Failure keep door closed during event | (50 demerits) | <u> </u> |
| Failure to drive with headlights on | (50 demerits) | <u> </u> |
| Back up during the event | (50 demerits) | <u> </u> |



Judges mark which balls were hit

CURB LINE PARK EVENT

Contestant#

29

Event Judge

Dean + G. Schaefer

Maximum Score:

50 points

Demerits:

50

Score Earned:

0**DEMERITS**

Hits either back or front barrier

(50 demerits)

Hitting the curb with tire

(50 demerits)

0" to 12"

(0 demerits)

12" to 18"

(20 demerits)

18" and over

(50 demerits)

Failure to use right turn signal before entry

(10 demerits)

Failure to cancel right turn signal

(10 demerits)

Failure to properly park the bus, apply park brake
and sound horn within 2 min. time limit.

(50 demerits)

Failure to use left turn signal when leaving

(10 demerits)

Failure to perform 5-point mirror check on leaving

(0 demerits)

Failure to cancel left turn signal after event

(10 demerits)

Backing up during event

(50 demerits)

Failure to wear seat belt

(50 demerits)

Failure to complete event

(50 demerits)

Failure to drive with headlights on

(50 demerits)

Failure to keep door closed during event

(50 demerits)

ACTUAL TIME:1 12 8

Min.

Sec.

Put Measurements Here:38

STOP LINE TEST

Contestant #

29

Event Judge

Bergen / Century

Exhibit H Event--4

Maximum Score

25 points

Demerits:

Score Earned:

17

DEMERITS

0"-2"

(0 demerits)

Over 2" to 4"

(3 demerits)

Over 4" to 6"

(6 demerits)

Over 6" to 8"

(9 demerits)

Over 8" to 10"

(12 demerits)

Over 10" to 12"

(15 demerits)

Over 12" to 14"

(18 demerits)

Over 14" to 16"

(21 demerits)

Over 16"

(25 demerits)

Stops with bumper beyond stop line

(25 demerits)

Failure to complete event

(25 demerits)

Backs up during event

(25 demerits)

Failure to wear seat belt

(25 demerits)

Failure to keep door closed

(25 demerits)

Failure to drive with headlights on

(25 demerits)

Stops more than once

(25 demerits)

23

15

25

Put Measurements Here:

Did not complete event

PARALLEL PARKING TEST**Exhibit H**
Event--5

Contestant #

29

Event Judge

Kathryn / Sonia

Maximum Score:

50 points

Demerits:

12

Score Earned:

28**DEMERITS****Entering the Parking Zone**

Check each instance of backing the bus and charge 5 demerits each instance over two backs.

(0) (0) (5) (10) (15) (20) (25) (max 25 demerits)

Bus touches any barrier

(05 demerits)

Tire tread touches the curb line

(50 demerits)

(50 demerits)

Parking Zone Scoring Parallel to Curb:

Zone 1 Bus parked 0"-3"

(00 demerits)

Zone 2 Bus parked 3"-6"

(03 demerits)

Zone 3 Bus parked 6"-9"

(06 demerits)

Zone 4 Bus parked 9"-12"

(09 demerits)

Zone 5 Bus parked 12"-15"

(12 demerits)

Zone 6 Bus parked 15"-18"

(15 demerits)

Bus parked (over 18" from curb)

(50 demerits)

Exiting the Parking Zone:

Check each instance of backing up the bus and charge 5 demerits for each instance over two backs.

(0) (0) (5) (10) (15) (20) (25) (max 25 demerits)

Bus touches any barrier

(05 demerits)

Tire tread touches the curb line

(50 demerits)

(50 demerits)

Failure to:

Park the bus, set the parking brake and sound horn within the 3-minute limit

(50 demerits)

Failure drive with the headlights on

(50 demerits)

Failure wear seat belt

(50 demerits)

Failure keep door closed during event

(50 demerits)

Failure to activate directional signal (entering/exiting)

(50 demerits)

Failure to cancel directional signal

(10 demerits)

ACTUAL TIME:

Min.

Sec.

1 57

Exhibit H

Event--6

LEFT TURN TEST

Contestant#

297

on side of road
old car
gent

Event Judge

Rita & Ernest

Maximum Score:

50 points

Demerits:

25

Score Earned:

25

ENTERING AND RECOVERING FROM TURN:

THIS WILL BE A TIMED EVENT. The contestant shall be allowed 15 seconds.

The time will start when the left rear outside tire enters or passes the front edge of the entry score template and will end when the left rear outside tire leaves or passes the rear edge of the recovery scoring template.

Scoring will be based on the method in which the driver enters and recovers from the turn. For scoring purposes, the outer edge of the left outside tire tread will be used. The left rear outside tire must pass through the entire scoring template at the beginning and completion of the turn.

Direction of Travel

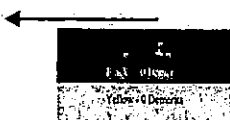


Tire travel through entire scoring template

Yellow	0" to 6"	(0 demerits)
Black	6" to 9"	(10 demerits)
Red	9" to 12"	(20 demerits)
(Off of Template)		(25 demerits)

DEMERITS

Direction of Travel



Tire travel through entire scoring template

Yellow	0" to 6"	(0 demerits)
Black	6" to 9"	(10 demerits)
Red	9" to 12"	(20 demerits)
(Off of Template)		(25 demerits)

For each instance of stopping

(5) (5) (5) (5) (5) (max 25 demerits)

(25 demerits)

Backing of the bus

(50 demerits)

Any tire tread touches the curb line

(50 demerits)

Failure to:

Activate left directional turn signal

(10 demerits)

Cancel left directional turn signal

(10 demerits)

Drive with the headlights on

(50 demerits)

Wear seat belt

(50 demerits)

Keep door closed during the event

(50 demerits)

Complete event within time limit

(50 demerits)

ACTUAL TIME:

Min.

Sec.

1 18.95

Exhibit H Event--7

RXR GRADE CROSSING - RIGHT TURN TEST

Contestant#

29

Event Judge

Carolyn / Horton

Maximum Score:

75 points

Demerits:

35

Score Earned:

40

APPROACH THE RXR GRADE CROSSING:

FAILURE TO:

- Complete the event
- Drive with headlights or not wearing seatbelt
- Properly use turn signals during the event
- Stop between 15 to 50 feet from the nearest rail
- Stop, open door or window (if applicable) at RXR grade crossing
- Check the tracks in both directions and ensure that it is safe to cross
- Check left outside mirror(s) before crossing the tracks
- Check right outside mirror(s) before crossing the tracks
- Check inside rearview mirror before crossing the tracks
- Close entrance door
- Clear back of bus by at least 15 feet from the nearest rail after crossing the tracks

(75 demerits)

(75 demerits)

(25 demerits)

(75 demerits)

(75 demerits)

(10 demerits)

(10 demerits)

(10 demerits)

(25 demerits)

(75 demerits)

DEMERITS

ENTERING TURN

THIS WILL BE A TIMED EVENT. The contestant shall be allowed 15 seconds to complete the turn.

The time will start when the right rear dual enters or passes the front edge of the entry score template and will end when the right rear tire enters or passes the rear edge of the recovery scoring template.

Scoring will be based on the method in which the driver enters and recovers from the turn. For scoring purposes, the outer edge of the tire's tread will be used. The right rear outside tire must pass through the entire scoring template at the beginning and completion of the turn.

Direction of Travel



Tire travel through entire scoring template

(Off of Template)

Red 9" to 12"

Black 6" to 9"

Yellow 0" to 6"

(25 demerits)

(20 demerits)

(10 demerits)

(0 demerits)

25

ELEMENTARY STUDENT LOADING EVENT

Contestant#

29

Event Judge D. W. W. A. L. Winkler

Exhibit H Event--8

Maximum Score

75 points

Demerits:

-75

Score Earned

0

DEMERITS

Failure to perform proper mirror checks
(5-point mirror checks)

(25 demerits)

Failure to properly use turn signals on entry and
exit of loading zone

(75 demerits)

Failure to activate yellow warning lights

(75 demerits)

Failure to wear seat belt

(75 demerits)

Failure to complete events

(75 demerits)

Backing up the bus during event

(75 demerits)

Failure to drive with headlights on

(75 demerits)

Keep the door closed while in motion

(25 demerits)

Jerky or sudden stops

(10 demerits)

Bus stopped closer than 10 feet from student
(back from student)

(10 demerits)

Bus stopped more than 15 feet from student
(back from student)

(10 demerits)

Failure to stop at least 6 ft. away from student
(back from student)

(10 demerits)

Failure to set parking brake and place vehicle in
neutral/park before door is opened

(75 demerits)

Failure to activate red crossover lights and stop
arm

(75 demerits)

Failure to deactivate red crossover lights and stop
arm if not automatically cancelled by closing door

(75 demerits)

Failure to perform proper mirror check (5 count
mirror check)

(50 demerits)

BACK UP STALL EVENT

Contestant# 29

Event Judge Shayna / Debra

Exhibit H
Event--9

Maximum Score: 50 points
Demerits: 150
Score Earned: 35
DEMERITS

Tire tread touches the wheel limitation line
Bus touches the front upright standards
Tire touches the stall sideline
Bus extends into or over rear barrier
Failure to pull out between the front upright standards
Failure to park bus, set the parking brake and sound horn within three (3) minute time limit (Time starts when front bumper passes upright standard)
Each instance of forward motion after the first back up
(0) (6) (12) (18) (24) (30) (36) (42)
(max of 42 demerits)
Bus parked more than 1 inch off of center line each inch or fraction thereof (front and/or rear - greatest only) (2) (4) (6) (8) (10) (12) (14)
(max of 14 demerits)
Forward of the one-foot free zone-5 demerits for each 6" or fraction thereof
(5) (10) (15) (20) (25) (30) (35) (40) (45) (50)
(max of 50 demerits)
Bus parked behind one-foot free zone-10 demerits for each 6" or fraction thereof
(10) (20) (30) (40) (50)
(max of 50 demerits)

(50 demerits) X
(50 demerits) _____
(50 demerits) X
(50 demerits) _____
(50 demerits) _____

(50 demerits) _____

(06 demerits) _____

(02 demerits) _____

(05 demerits) _____

(10 demerits) _____

Failure to do any of the following:
Failure complete the event.
Failure wear seat belt
Failure to keep door closed during event
Failure to drive with headlights on.

(50 demerits) _____
(50 demerits) _____
(50 demerits) _____
(50 demerits) _____

ACTUAL TIME: 3 101 ³⁰
Min. Sec.

Put Measurements Here:

Measurement off Center Line: _____

Forward of Free Zone: _____

Behind Free Zone: _____

OFFSET ALLEY TEST

Contestant#

29

Event Judge

Robyn / Quinn

Maximum Score:

50 points

Demerits:

29

Score Earned:

21

FAILURE TO:

Complete event in the 2 minute time limit

(50 demerits)

Drive with the headlights on

(50 demerits)

Wear seat belt properly

(50 demerits)

Keep door closed during event

(50 demerits)

DEMERITS

Each instance of stopping forward motion of the bus (8) Max. of (16 demerits)

8

For each flag tip touched (1=7) (2=21) (3=42) (4=50) Max. of (50 demerits)

21

Backing during the event

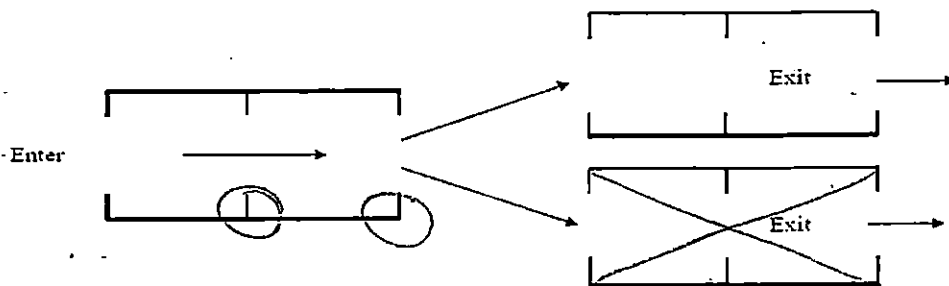
(50 demerits)

Vehicle touches a barrier (excluding base)

(50 demerits)

Actual Time 1 Min. 15 Sec.

Indicate which flag tip or barrier has been touched



V. CAUSES OF ACTION

8. Defendants are liable to Plaintiff for improperly retaliating against Plaintiff based on Unprofessional Investigation grounds, Unemployment Benefits Program fraud giving misleading information to get benefits reversed during TEXAS WORKFORCE COMMISSION Hearing violating my Unemployment rights, Violating the Employee Right Act, Attempted Civil Rights Violation for 365 days and Civil Rights violated for 15 days.

Unemployment Benefits Fraud & Identity Fraud

What's the difference between Unemployment Benefits Identity fraud and Unemployment Benefits Program fraud?

Unemployment Benefits Identity (ID) Fraud	Unemployment Benefits Program Fraud
Unemployment Benefits Identity fraud happens when imposters use other people's information to illegally receive unemployment benefits. In simple terms, ID fraud is when an imposter applies for benefits using your name. • "Unemployment ID Fraud" is when imposters use another person's name and Social Security number to apply for unemployment benefits. • "Claim Hijacking or Claim/Account Takeover" is when imposters use another person's information to illegally log into a person's	Unemployment Benefits Program fraud is knowingly giving false or misleading information or withholding information to get benefits or to increase benefits. In simple terms, it means you file a claim and purposefully give wrong information so that you will be paid. • The most common type of benefits fraud is failing to correctly report work and earnings when filing for unemployment benefits. • Benefits fraud is also if you do not report or give incorrect information about a job separation.

Unemployment Benefits Identity (ID) Fraud	Unemployment Benefits Program Fraud
unemployment account and steal the unemployment benefit payments intended for the real claimant.	• Another example is if you file for benefits and give false information about being able to work or looking for work.

VI. REQUEST FOR RELIEF

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully requests that this Court:

A. Order Defendants to institute and carry out policies, practices, and programs which provide equal employment opportunities for all employees, and which eradicate the effects of its past and present unlawful employment practices.

B. Order Defendants to make Plaintiff whole by providing appropriate pay in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices.

C. Order Defendants to make Plaintiff whole by providing compensation for future pecuniary losses resulting from the unlawful employment practices described in the above paragraphs, including out -of-pocket expenses, in an amount to be determined at trial.

D. Order Defendants to make Plaintiff whole by providing appropriate pay in amounts to be determined at trial, for additional educational expenses for past and future non-pecuniary losses resulting from the acts complained of in the above paragraphs, including without limitation, emotional pain, suffering, and loss of enjoyment of life, in an amount to be determined at trial

E. Order Defendants to make Plaintiff whole by providing compensation for past and future non-pecuniary losses resulting

E. Order Defendants to make Plaintiff whole by providing compensation for past and future non-pecuniary losses resulting from the acts complained of in the above paragraphs, including without limitation, emotional pain, suffering, and loss of enjoyment of life, in an amount to be determined at trial.

F. Order defendants to pay Plaintiff punitive damages for the conduct described in the above paragraphs, in amounts to be determined at trial, to the fullest extent allowed by law.

G. Plaintiff is seeking \$5,000,000.00 (Five Million Dollars) for all damages. Or amount to be determined at trial plus taxes on the award amount.

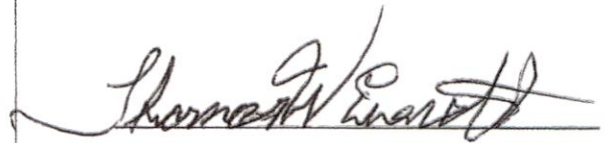
Respectfully submitted,

Thomas Wayne Everett
55 Spring Creek Dr.
Shepherd, Texas 77371
(936) 391-6431

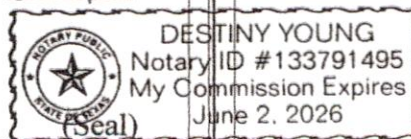
STATE OF TEXAS

COUNTY OF TX

SUBSCRIBED AND SWORN TO BEFORE ME, on
the 10th day of October, 2024


(Signature)

Signature Destiny Young
NOTARY PUBLIC



My Commission expires: June 2, 2026

FILED
at 11:33 o'clock A M

OCT 07 2024