

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No:
Date purchased:

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JOSEPH EARL JACKSON,

Plaintiffs designates:
NEW YORK County as the
place of trial

Plaintiff,

The basis of the venue is
Defendants Principal
Place of Business

-against-

OPENCOMMUNICATIONS OMNIMEDIA LLC,
JOHN ANDREW MORRIS, SALLY O'DOWD
and KATHRYN CAMPISANO,

SUMMONS

Defendants' Principal Place
of Business is at:
240 W 30th Street
New York, NY 10001

Defendants.

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To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
February 24, 2014

AKIN LAW GROUP
Attorneys for Plaintiff(s)

/s/ Robert Salaman

By: Robert D. Salaman, Esq.
45 Broadway, Suite 2650
New York, New York 10006
(212) 825-1400

Defendants' Addresses:

OPENCOMMUNICATIONS OMNIMEDIA LLC

-Via Secretary of State-

The Firehouse

240 W 30th Street

New York, New York 10001

JOHN ANDREW MORRIS

@ Place of Employment

240 W 30th Street

New York, New York 10001

SALLY O'DOWD

@ Place of Employment

240 W 30th Street

New York, New York 10001

KATHRYN CAMPISANO

@ Place of Employment

240 W 30th Street

New York, New York 10001

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No:

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JOSEPH EARL JACKSON,

VERIFIED COMPLAINT

Plaintiff,

-against-

OPENCOMMUNICATIONS OMNIMEDIA LLC,
JOHN ANDREW MORRIS, SALLY O'DOWD
and KATHRYN CAMPISANO,

Defendants.

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Plaintiff JOSEPH EARL JACKSON, by his attorneys, AKIN LAW GROUP PLLC, upon information and belief, complains of the Defendants as follows:

1. Plaintiff JOSEPH EARL JACKSON complains pursuant to the laws of the State of New York and the Administrative Code of the City of New York, seeking damages to redress the injuries Plaintiff has suffered as a result of being harassed, discriminated against, retaliated against and terminated by the Defendants on the basis of his sex and sexual harassment. In addition, Plaintiff was subject to retaliation for reporting the discriminatory conduct of his former employer.
2. That at all times hereinafter mentioned, the Plaintiff JOSEPH EARL JACKSON, (hereinafter "JACKSON") was and still is a resident of the County of Bronx, State of New York.
3. That at all times hereinafter mentioned, the Defendant OPENCOMMUNICATIONS OMNIMEDIA LLC (hereinafter "OC") was and is an entity authorized to conduct business in the State of New York.

4. That at all times hereinafter mentioned, the Defendant OC was and is a for-profit entity duly organized and existing under and by virtue of the laws of the State of New York.
5. That at all times hereinafter mentioned, the Defendant OC was and is a domestic limited liability entity authorized to conduct business in the State of New York.
6. That at all times hereinafter mentioned, Defendant OC operates a business from the premises designated and/or more commonly known as 240 W 30th Street, New York NY 10001.
7. That at all times herein relevant, Defendant JOHN ANDREW MORRIS (hereinafter “MORRIS”) was and is a resident of the State of Connecticut.
8. That at all times herein relevant, Defendant MORRIS was and is employed by Defendant OC.
9. That at all times herein relevant, Defendant MORRIS was and is the Chief Executive Officer at Defendant OC.
10. That at all times herein relevant, Defendant MORRIS was and is in a supervisory or managerial position with the Defendant OC.
11. That at all times herein relevant, Defendant MORRIS was and is an agent, servant and/or employee of Defendant OC.
12. That at all times herein relevant, Defendant MORRIS had authority to hire employees and terminate employees on behalf of Defendant OC.
13. That at all times herein relevant, Defendant MORRIS worked at the premises designated and more commonly known as 240 W 30th Street, New York NY 10001.
14. That at all times herein relevant, Defendant SALLY O’DOWD (hereinafter “O’DOWD”) was and is a resident of the State of New York.

15. That at all times herein relevant, Defendant O'DOWD was and is employed by Defendant OC.
16. That at all times herein relevant, Defendant O'DOWD was employed by Defendant OC as an Chief of Strategy and New Business.
17. That at all times herein relevant, Defendant O'DOWD was and is in a supervisory or managerial position with the Defendant OC.
18. That at all times herein relevant, Defendant O'DOWD was and is an agent, servant and/or employee of Defendant OC.
19. That at all times herein relevant, Defendant O'DOWD worked at the premises designated and more commonly known as 240 W 30th Street, New York NY 10001.
20. That at all times herein relevant, Defendant KATHRYN CAMPISANO (hereinafter "CAMPISANO") was and is employed by Defendant OC.
21. That at all times herein relevant, Defendant CAMPISANO was and is employed as an Account Supervisor at Defendant OC.
22. That at all times herein relevant, Defendant CAMPISANO was and is in a supervisory or managerial position with the Defendant OC.
23. That at all times herein relevant, Defendant CAMPISANO was and is an agent, servant and/or employee of Defendant OC.
24. That at all times herein relevant, Defendant CAMPISANO worked at the premises designated and more commonly known as 240 W 30th Street, New York NY 10001.
25. That at all times hereinafter mentioned, the Defendant OC, Defendant MORRIS, Defendant O'DOWD, and Defendant CAMPISANO are hereinafter jointly referred to as "Defendants".

26. That at all times hereinafter mentioned, Plaintiff JACKSON was and is employed by Defendants.
27. On or about July 12, 2013, Plaintiff JACKSON commenced his employment with Defendant OC.
28. During the first two weeks of employment at OC, Plaintiff JACKSON's designated position was Executive Assistant for Defendant MORRIS.
29. Starting on or about August 2013, Plaintiff JACKSON was promoted to the position of Account Coordinator at Defendant OC.
30. Plaintiff JACKSON's responsibilities and duties with Defendants included pitching clients and writing press releases.
31. Plaintiff JACKSON was paid an annual salary of \$35,000 at Defendant OC.
32. During the course of his employment with Defendant OC, Plaintiff JACKSON had continuous contact with Defendant MORRIS, Defendant O'DOWD and Defendant CAMPISANO.
33. Shortly after Plaintiff JACKSON commenced employment with Defendants, Defendant O'DOWD started to discriminate and harass Plaintiff JACKSON because of his gender/sex.
34. Defendant O'DOWD was Plaintiff JACKSON's superior at Defendant OC.
35. On or about August 30, 2013, Plaintiff JACKSON and other OC employees celebrated Defendant O'DOWD's birthday at Ken & Cook Restaurant, located at 19 Kenmare Street, New York NY 10012.
36. As the birthday party ended, Defendant O'DOWD approached Plaintiff JACKSON without warning and hugged him three (3) times.

37. While hugging Plaintiff JACKSON, Defendant O'DOWD sexually whispered in to his ear, "You are so handsome", "You are so awesome" and "You are so talented".
38. During the third unwelcome hug, Defendant O'DOWD kissed Plaintiff JACKSON on the back of his neck.
39. Plaintiff JACKSON never hugged Defendant O'DOWD back and immediately left the restaurant distraught.
40. On an ongoing and pervasive basis, Defendant O'DOWD would approach Plaintiff JACKSON throughout the day to make inappropriate sexual comments to him.
41. By way of example, on more than ten (10) occasions, Defendant O'DOWD commented on how "sexy" Plaintiff JACKSON looked.
42. Additionally, Defendant O'DOWD would approach Plaintiff JACKSON throughout the day and physically assault him.
43. On numerous occasions, Defendant O'DOWD would forcibly touch Plaintiff JACKSON's abdomen.
44. On several occasions, Defendant O'DOWD would forcibly massage Plaintiff JACKSON's neck.
45. On several occasions, Defendant O'DOWD would forcibly massage Plaintiff JACKSON's arms.
46. On several occasions, Defendant O'DOWD would kiss Plaintiff JACKSON's neck.
47. Defendant O'DOWD escalated the sexual harassment with time.
48. On or about October 3, 2013, Defendant O'DOWD told Plaintiff JACKSON that she loved how sexy his chest and deltoids were in his white-button down shirt.

49. Specifically, Defendant O'DOWD said, **“Look at Joseph [Plaintiff JACKSON] with his sexy chest and deltoids.”**
50. Moreover, Defendant O'DOWD would frequently speak to Plaintiff JACKSON about dates and sexual encounters she had from the prior night.
51. On more than one occasion, Defendant O'DOWD detailed to Plaintiff JACKSON how she loved young black and Hispanic men.
52. The sexual harassment Plaintiff JACKSON endured was not just limited to Defendant O'DOWD, but also included other Defendant OC employees.
53. For instance, in or around November 2013, Defendant CAMPISANO texted Plaintiff JACKSON, **“When are we going to have our bang sesh?”**
54. On many other occasions, Defendant CAMPISANO would tell Plaintiff JACKSON, “You're hot”.
55. On December 7, 2013, Defendant CAMPISANO texted Plaintiff JACKSON, **“I'm going to need you to be my next boyfriend Joseph.”**
56. In addition, Defendant CAMPISANO also texted Plaintiff JACKSON, you “may be easier to bang when were not coworkers”
57. On one instance, while working together in the basement at Defendant OC, Defendant CAMPISANO said that she wanted to pull Plaintiff JACKSON into the shower.
58. Plaintiff JACKSON always denied Defendant CAMPISANO's unwelcome sexual advances.
59. On or about November 15, 2013, Lovability (an OC client) came into the office to pitch a new product – a case with a condom inside.

60. Following the November 15, 2013 meeting, Defendant CAMPISANO took out a condom from a case and placed the condom on a banana, stating that the condom was “tight around the base.”
61. Defendant O’DOWD immediately commented on the girth of Plaintiff JACKSON’s penis by stating, **“It [the condom] probably wouldn’t fit Joseph [Plaintiff JACKSON].”**
62. Later in the day on or around November 15, 2013, Plaintiff JACKSON mentioned to several co-workers how he was too afraid to speak to a girl on the D-train that morning. In response, Defendant O’DOWD told Plaintiff JACKSON, **“We totally need to get you fucked everyday.”**
63. The sexual harassment Plaintiff JACKSON was forced to endure by the Defendants was pervasive.
64. For example, on or about December 6, 2013, Defendant O’DOWD told Plaintiff JACKSON, **“This is great. I get to stand next to Joseph and his sexy biceps.”**
65. Additionally, on or about December 18, 2013, Defendant O’DOWD approached Plaintiff JACKSON and said, “I’ve been doing these exercises and crunches. My body is so fit and tight. Poke my abdomen.” After Plaintiff JACKSON initially refused, Defendant O’DOWD forcibly grabbed Plaintiff JACKSON’s hand to touch her abdomen.
66. Also, while Plaintiff JACKSON and Defendant O’DOWD were by the water cooler at work, Defendant O’DOWD said that, **“You [Plaintiff JACKSON] remind me of my hot young Puerto Rican lover Apollo.”**
67. Defendant O’DOWD would frequently tell Plaintiff JACKSON how she loves young Hispanic and Puerto Rican men.

68. Defendant O'DOWD would frequently tell Plaintiff JACKSON how she loves men with tight bulging arms.
69. Plaintiff JACKSON always stated that he has no interest in developing a romantic relationship with any of his OC supervisors.
70. The sexual harassment was not just limited to Plaintiff JACKSON. Defendant O'DOWD frequently commented on how sexy Mr. Jonathon Lovitz's (OC employee) body was.
71. In addition, Defendant O'DOWD asked Mr. Daniel Cotera Cape (OC employee) how to give fellatio to another man.
72. Furthermore, Defendant O'DOWD commented on how long and sexy Ally Voss's (OC employee) legs were.
73. Despite the sexual harassment Plaintiff JACKSON endured, he continued to perform as a stellar employee.
74. Plaintiff JACKSON was praised for his work by his Defendant OC superiors on numerous occasions.
75. Plaintiff JACKSON remained in such good standing with Defendant OC that he was entrusted to help lead the Social Media events for Defendant OC in mid-February 2014.
76. Plaintiff JACKSON constantly complained about the sexual harassment and has repeatedly told his colleagues and supervisors that he did not like how he was being treated.
77. Plaintiff JACKSON repeatedly expressed his discomfort with the sexual harassment at Defendant OC.
78. In or around October 2013, Plaintiff JACKSON first complained about the sexual harassment to Defendant MORRIS. Plaintiff JACKSON described how uncomfortable

Defendants actions made him feel. In response, Defendant MORRIS said, "I'm sorry. I will look into it."

79. Defendant MORRIS ignored Plaintiff JACKSON's complaints and refused to stop the harassment.

80. In or around November 2013, Plaintiff JACKSON made a second verbal complaint about the sexual harassment to Defendant MORRIS. Defendant MORRIS said that he would get on top of it and look into it.

81. Once again, Defendant MORRIS took no action and failed to stop the harassment.

82. In fact, Defendant MORRIS called Plaintiff JACKSON in front of other OC employees, "a hater that needed to be removed".

83. During the first week of December 2013, Plaintiff JACKSON made a third complaint to Defendant MORRIS. Plaintiff JACKSON asked to work on separate accounts from Defendant O'DOWD.

84. Defendant MORRIS told Plaintiff JACKSON that he would remove him from the SponsorHub account that Defendant O'DOWD was working on in approximately two (2) weeks. Defendant MORRIS never removed Plaintiff JACKSON from the SponsorHub account after two weeks passed.

85. Plaintiff JACKSON also complained to Defendant MORRIS about the sexual advances that Defendant CAMPISANO made upon him. Defendant MORRIS immediately dismissed Plaintiff JACKSON's concerns, laughing and brushing it off.

86. Defendant MORRIS ignored Plaintiff JACKSON's complaint by telling him, "I don't understand what the problem is. You're doing good here."

87. Even though Plaintiff JACKSON complained about the sexual harassment Defendant CAMPISANO engaged in, Defendant MORRIS gave Defendant CAMPISANO a raise and promotion from Account Manager to Account Supervisor.
88. Despite Plaintiff JACKSON's determined words and complaints, the sexual harassment and hostile work environment at Defendant OC only intensified.
89. For example, on or about December 6, 2013, Defendant O'DOWD stood next to Plaintiff JACKSON and said, **"I get to stand next to Joseph [Plaintiff JACKSON] and his sexy biceps."** Defendant MORRIS overheard the comment, shrugged his shoulders and rolled his eyes.
90. In addition, on or about January 6, 2014 around 10:00 a.m., Defendant O'DOWD approached Plaintiff JACKSON at work and hugged Plaintiff JACKSON while rubbing his head without warning.
91. Defendant O'DOWD told Plaintiff JACKSON, "Joseph, you just need a release, a purge, you just need to hit something."
92. Over time, Plaintiff JACKSON made multiple more complaints to other OC supervisors.
93. For instance, on or about January 11, 2014, Plaintiff JACKSON emailed a formal written complaint to Ms. Deborah Caldwell (OC Chief of Content).
94. On or about January 15, 2014, Plaintiff JACKSON and Defendant MORRIS were meeting with clients from Chicago. After Defendant MORRIS asked Defendant O'DOWD to come into the room to introduce herself, Defendant O'DOWD told Plaintiff JACKSON, "Joseph, your hair is growing." Defendant O'DOWD then rubbed Plaintiff JACKSON's head and massaged the back of his neck.

95. On or about January 23, 2014, a meeting was held with Plaintiff JACKSON, Defendant MORRIS, Ms. Deborah Caldwell and Ms. Jessica Goldfarb.
96. At the meeting, Defendant MORRIS yelled at Plaintiff JACKSON, “Why do you have to make this look like a litigation?”
97. Not only did the sexual harassment increase, but the Defendants also retaliated against Plaintiff JACKSON for making said complaints.
98. Following Plaintiff JACKSON’s complaints, the Defendants increased Plaintiff JACKSON’s workload.
99. Following Plaintiff JACKSON’s complaints, the Defendants gave more negative feedbacks on projects Plaintiff JACKSON was working on.
100. Following Plaintiff JACKSON’s complaints, the Defendants more often critiqued Plaintiff JACKSON’s agendas and reports.
101. By way of example, Ms. Annie Granatstein (Director of Content at Defendant OC) required that Plaintiff JACKSON first show his agendas to her prior to sending to the client Fiverr. Plaintiff JACKSON never previously needed a supervisor to approve his work before sending to Fiverr.
102. On or about February 10, 2014, Defendants terminated the employment of Ms. Ally Voss and Mr. Daniel Cope Cotera, two of Plaintiff JACKSON’s friends and colleagues.
103. On February 21, 2014 at approximately 5:00 p.m., Defendant MORRIS terminated Plaintiff JACKSON.
104. Since Plaintiff JACKSON’s termination from Defendant OC, Defendant MORRIS has intentionally and maliciously spoken about Plaintiff JACKSON with Plaintiff JACKSON’s former and prospective employers.

105. Plaintiff JACKSON was and is shocked and emotionally distraught by the sexual harassment and retaliation he has endured by the Defendants.
106. More significantly, Plaintiff JACKSON continues to endure both pecuniary and non-pecuniary losses as a result of the intentional, malicious and illegal acts and activities of the Defendants.
107. Defendants unlawfully sexually harassed, discriminated against and retaliated against the Plaintiff JACKSON.
108. Defendants treated Plaintiff JACKSON differently because of his sex.
109. Defendants subjected Plaintiff JACKSON to unwelcome and sexually offensive conduct and advances.
110. Plaintiff JACKSON has been unlawfully harassed, discriminated and retaliated against, was humiliated, and has been degraded and belittled.
111. Plaintiff JACKSON's situation was and is intolerable as a result of the sexual harassment and discrimination by Defendants to which he was subjected, and no reasonable person in Plaintiff JACKSON's position should be subjected to such acts.
112. The Defendants retaliated against and terminated Plaintiff JACKSON because of his refusal to submit to the sexual advances of the Defendants.
113. The Defendants have caused damage and injury to the Plaintiff by first subjecting him to sexual harassment and then again by protecting the individuals that caused and created the sexual harassment.
114. Defendants' actions and conduct were intentional and intended to harm the Plaintiff.
115. As a result of Defendants' actions, Plaintiff felt extremely humiliated, degraded, victimized, embarrassed, and emotionally distressed.

116. As a result of the Defendants' actions, Plaintiff has suffered economic loss.
117. As a result of the Defendants' discriminatory and intolerable treatment, Plaintiff suffered severe emotional distress.
118. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss of income, the loss of a salary, bonuses, benefits and other compensation which such employment entails, and Plaintiff has also suffered future pecuniary losses, emotional pain, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Plaintiff has further experienced severe emotional and physical distress.
119. As a result of the above Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.
120. As Defendants' conduct has been willful, reckless, outrageous, intentional and/or malicious, Plaintiff also demands punitive damages in an amount which exceeds the jurisdictional limits of all lower Courts.

AS A FIRST CAUSE OF ACTION
FOR DISCRIMINATION UNDER STATE LAW

121. Plaintiff repeats, reiterates and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.
122. Executive Law § 296 provides that it shall be an unlawful discriminatory practice: (a) For an employer or licensing agency, because of the age, race, creed, color, national origin, sexual orientation, military status, sex, disability, genetic predisposition or carrier status, or marital status of any individual, to refuse to hire or employ or to bar or to discharge from

employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment.

123. Defendant engaged in an unlawful discriminatory practice by taking adverse employment action and otherwise discriminating against the Plaintiff because of his sex and engaging in sexual harassment and a hostile work environment.

124. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

AS A SECOND CAUSE OF ACTION
FOR DISCRIMINATION UNDER STATE LAW

125. Plaintiff repeats, reiterates and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.

126. New York State Executive Law §296(7) provides that it shall be an unlawful discriminatory practice:

"For any person engaged in any activity to which this section applies to retaliate or discriminate against any person because he has opposed any practices forbidden under this article."

127. Defendant engaged in an unlawful discriminatory practice by taking adverse employment action, retaliating, and otherwise discriminating against the Plaintiff because of Plaintiff's opposition to the unlawful employment practices of Defendants.

128. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

AS A THIRD CAUSE OF ACTION
FOR DISCRIMINATION UNDER THE NEW YORK CITY
ADMINISTRATIVE CODE

129. Plaintiff repeats, reiterates and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.
130. The Administrative Code of City of NY § 8-107 [1] provides that "It shall be an unlawful discriminatory practice: "(a) For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, **gender**, disability, marital status, sexual orientation or alienage or citizenship status of any person, to refuse to hire or employ or to bar or to discharge from employment such person or to discriminate against such person in compensation or in terms, conditions or privileges of employment."
131. Defendant engaged in an unlawful discriminatory practice in violation of New York City Administrative Code Title 8, §8-107(1)(a) by actually and constructively taking adverse employment action, creating and maintaining discriminatory working conditions, and otherwise discriminating against the Plaintiff because of his sex and engaging in sexual harassment and a hostile work environment.
132. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

AS A FOURTH CAUSE OF ACTION FOR DISCRIMINATION
UNDER THE NEW YORK CITY ADMINISTRATIVE CODE

133. Plaintiff repeats, reiterates and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.
134. The New York City Administrative Code Title 8, §8-107(1)(e) provides that it shall be unlawful discriminatory practice:

"For an employer . . . to discharge . . . or otherwise discriminate against any person because such person has opposed any practices forbidden under this chapter. . . "

135. Defendant engaged in an unlawful discriminatory practice in violation of New York City Administrative Code Title 8, §8-107(1)(e) by taking adverse employment action and otherwise discriminating against the Plaintiff because of Plaintiff's opposition to the unlawful employment practices of Plaintiff's employer.

136. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A FIFTH CAUSE OF ACTION FOR
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

137. Plaintiff repeats, reiterates and realleges each and every allegation made in the above paragraphs of this complaint as if more fully set forth herein at length.

138. Defendants engaged in extreme and outrageous conduct.

139. Defendants intended to cause, or disregarded a substantial probability of causing, severe emotional distress to Plaintiff.

140. There exists a causal connection between the above conduct and said injury.

141. As a result of said conduct Plaintiff suffered and suffers from severe emotional distress.

142. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A SIXTH CAUSE OF ACTION FOR
ASSAULT & BATTERY**

143. Plaintiff repeats, realleges, and restates each and every paragraph above as if said

paragraphs were more fully set forth herein at length.

144. That at all times hereinafter mentioned, Defendant O'DOWD wrongfully and falsely, without any warrant or other legal process and without authority of the law and without any reasonable cause touched and/or caused contact with the plaintiff, seized, assaulted, laid hold, detained and/or imprisoned the Plaintiff without consent or provocation by the Plaintiff.
145. That the Defendants assaulted and battered the Plaintiff.
146. That the Defendants caused physical, psychological and mental injury to the Plaintiff.
147. That as a direct result of the foregoing, the Plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower Courts.

**AS A SEVENTH CAUSE OF ACTION FOR
SLANDER**

148. Plaintiff repeats, realleges, and restates each and every paragraph above as if said paragraphs were more fully set forth herein at length.
149. That at all times hereinafter mentioned, the Defendant MORRIS made false accusatory, degrading, derogatory and slanderous statements about the Plaintiff.
150. That at all times hereinafter mentioned, in front of other Defendant OC employees, Defendant MORRIS called Plaintiff JACKSON, "a hater that needed to be removed".
151. The Plaintiff JACKSON is not "hater" and has not acted in any manner that would cause one to conclude that he was a "hater".
152. That at all times hereinafter mentioned, the Defendant MORRIS made the aforesaid slanderous statements about the Plaintiff JACKSON to third party individuals.
153. That at all times hereinafter mentioned, the Defendant MORRIS has made malicious false statements about Plaintiff JACKSON to his prospective future employers.

154. That Defendant MORRIS knew that such statements were untrue.
155. That Defendant MORRIS was motivated by malice, ill-will and spite.
156. That as a direct result of the foregoing, Plaintiff JACKSON has been damaged in an amount which exceeds the jurisdictional limits of all lower courts.

INJURY AND DAMAGES

157. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss and/or partial loss of a career and the loss and/or partial loss of a salary, bonuses, commissions, benefits and other compensation which such employment entails, out-of-pocket medical expenses and Plaintiff has also suffered future pecuniary losses, emotional pain, suffering, inconvenience, injury to reputation, loss of enjoyment of life, and other non-pecuniary losses. Plaintiff has further experienced severe emotional and physical distress.

WHEREFORE, Plaintiffs respectfully requests a judgment against the Defendants:

- A. Declaring that the Defendants engaged in unlawful employment practice prohibited by state common law, New York State Executive Law §296 et. Seq. and The New York City Administrative Code Title 8, §8-107 et. Seq.; and that the Defendants harassed, discriminated against, took adverse employment action against, and retaliated against Plaintiff on the basis of his sex;
- B. Awarding damages to the Plaintiff for all lost wages and benefits resulting from Defendants' unlawful employment practices;

- C. Awarding Plaintiff compensatory damages for mental, emotional and physical injury, distress, pain and suffering and injury to his reputation in an amount that exceeds the jurisdictional limit of all lower courts;
- D. Awarding Plaintiff punitive damages;
- E. Awarding Plaintiff attorney's fees, costs, and expenses; and
- F. Awarding Plaintiff such other and further relief as the Court may deem equitable, just and proper to remedy the Defendants' unlawful employment practices.

Dated: New York, New York
February 24, 2014

Respectfully Submitted,

AKIN LAW GROUP PLLC
Attorneys for Plaintiff

/s/ Robert Salaman

By: Robert Salaman, Esq.
45 Broadway, Suite 2650
New York, NY 10006
(212) 825-1400

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No:

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JOSEPH EARL JACKSON,

VERIFICATION

Plaintiff,

-against-

OPENCOMMUNICATIONS OMNIMEDIA LLC,
JOHN ANDREW MORRIS, SALLY O'DOWD
and KATHRYN CAMPISANO,

Defendants.

-----X

I, ROBERT D. SALAMAN, being duly sworn deposes and state under the penalties of perjury that: I am an attorney duly admitted to practice law in the courts of New York State and am an associate at the AKIN LAW GROUP PLLC, the attorneys of record for the plaintiff in the within action;

I have read the foregoing, VERIFIED COMPLAINT, and know the contents thereof; the same is true to my own knowledge, except as to the matters therein alleged to be on information and belief, and as to those matters I believe them to be true.

The reason this verification is made by me and not by the plaintiff is that the plaintiff resides in a county other than where we maintain our office.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows: Conversations with the plaintiff, review of file and all the pleadings and proceedings heretofore had herein.

Dated: New York, New York
February 24, 2014

/s/ Robert Salaman

Robert D. Salaman, Esq.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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JOSEPH EARL JACKSON,

Plaintiff,

-against-

OPENCOMMUNICATIONS OMNIMEDIA LLC,
JOHN ANDREW MORRIS and SALLY O'DOWD
and KATHRYN CAMPISANO,

Defendants.

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SUMMONS and VERIFIED COMPLAINT

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