

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

TIMOTHY HILL,	)	
	)	
PLAINTIFF,	)	
	)	CIVIL ACTION NO.
VS.	)	
	)	
OAKSTREET HEALTH,	)	HON.
	)	
DEFENDANT.	)	
	)	
	)	
	)	

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**COMPLAINT**

PLAINTIFF TIMOTHY HILL, by and through his attorneys, CARLA D. AIKENS, P.L.C., submit the following Complaint against OAKSTREET HEALTH.

**JURY DEMAND**

COMES NOW PLAINTIFF TIMOTHY HILL and hereby makes his demand for trial by jury.

**JURISDICTION**

1. At all times relevant to this complaint, Plaintiff Timothy Hill was a resident of Wayne County in the State of Michigan.
2. Defendant Oakstreet Health is a domestic for profit corporation, with a continuous and systematic place of business located at 27155 Cherry Hill Rd, Dearborn Heights, MI 48127, in Wayne County.
3. This action is brought in this Court on the basis of federal question jurisdiction, pursuant to Title VII of the Civil Rights Act of 1964, 42 USC 2000e et seq.
4. Pursuant to 28 U.S.C. §1367, this Court has supplemental jurisdiction over Plaintiff's

state law claims.

### VENUE

5. Venue is proper in the Eastern District of Michigan because the unlawful employment actions giving rise to Plaintiff's claims occurred in this District.

### STATEMENT OF FACTS

6. Plaintiff is an African American man.

7. On January 12, 2018, Defendant hired Plaintiff to work for Defendant in the capacity of an Outreach Associate/Account Executive.

8. Plaintiff's starting rate as an Outreach Associate/Account Executive was \$35,000 per year.

9. Plaintiff's Director while working as an Outreach Associate/Account Executive was LaShawnda Denson.

10. As part of his role, Plaintiff depended upon leads for "welcome visits," which consisted of potential clients coming into the facility to receive a tour and complimentary checkup by the doctor. Once the welcome visit was completed, Outreach Specialists were paid \$150, a crucial makeup of their base pay.

11. Not meeting the monthly goal for welcome visits could bar an Outreach Specialist from receiving a promotion.

12. From approximately January 2018 through March 2018, Plaintiff noticed that Denson only gave the women in the department leads towards welcome visits, as opposed to the men.

13. By giving the women in the department leads towards welcome visits and patients, Denson would ensure that the women were meeting their monthly goal and avoiding write-ups.

14. In March of 2019, Denson removed Plaintiff from all events so that he was unable to receive any new leads.
15. Events played an essential part of Plaintiff's job because that is where each Outreach Specialist was able to solicit leads for Defendant.
16. Plaintiff believed each Outreach Specialist was responsible for obtaining their own leads through the events organized by Defendant, or by planning their own event.
17. Around April 2019, two female coworkers admitted to Plaintiff that Denson was giving them leads for patients instead of equally distributing them.
18. Denson would organize with the Community Manager, Leilani Vance, to put the women on the events that were well attended and put him on events that did not result in any new leads.
19. Denson would bring the women in the department Starbucks and frequently take them out to lunch.
20. At the same time, Denson intentionally excluded Plaintiff from dining with the rest of the department for lunch.
21. After weekly meetings with Denson, Plaintiff was coerced into believing that he was going to lose his job and that he should quit.
22. Plaintiff was discouraged by Denson from seeking a promotion.
23. In January 2020, a different female co-worker was able to miss her target goal for three consecutive months without a write-up.

24. Around March 2020, an incident occurred wherein Plaintiff was verbally abused with racial slurs and physically assaulted.

25. Plaintiff alerted the practice manager, Bruce, and the Director, Brandon, to the incident but they took no action.

26. The man who assaulted and verbally abused Plaintiff was still allowed to be in the building.

27. Plaintiff escalated the incident to HR; however, nothing was done on his behalf.

28. Around late July or early August 2020, Plaintiff applied for a transfer due to the unresolved racial incident but was denied.

29. Plaintiff was informed that the reason he was denied a transfer was because “Demario Trent thought about it over the weekend and decided against it.”

30. Plaintiff then escalated the racial incident to HR corporate, who directed him to regional HR, in August 2020.

31. Plaintiff was terminated on August 25, 2020.

32. Plaintiff believes that he was subjected to discrimination based on his race.

33. Plaintiff believes that he was subjected to discrimination based on his sex.

34. Plaintiff believes that he was subjected to different terms and conditions of employment.

35. Plaintiff believes that he was denied promotions and discharged in retaliation for engaging in a protected activity in violation of Title VII of the Civil Rights Act of 1964, as set forth more fully below.

36. Plaintiff filed a charge with the EEOC on the basis of race and gender discrimination, and retaliation.

37. The EEOC issued a notice of right to sue letter on December 30, 2021, and this lawsuit followed.

38. Plaintiff requests relief as described in the Prayer for Relief below.

**COUNT I**  
**DISCRIMINATION ON THE BASIS OF GENDER IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, 42 U.S.C. 2000e et seq. (“Title VII”)**

39. Plaintiff incorporates by reference all allegations in the preceding paragraphs.

40. At all material times, Defendant was an employer and Plaintiff was an employee covered by, and within the meaning of, Title VII, as amended.

41. Defendant’s conduct, as alleged herein, violated Title VII of the Civil Rights Act of 1964, which makes it unlawful to harass or discriminate an employee on the basis of that employee’s gender.

42. Plaintiff is an African American man, and, as a result, is a member of a protected class pursuant to Title VII.

43. Plaintiff was subjected to offensive communication and/or conduct on the basis of his membership in this protected class.

44. Defendant and its agents’ unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Plaintiff’s rights.

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