

BUY™

SELL™

SHOP™



Downloaded From
www.TextBookDiscrimination.com



SELL YOUR OWN SAMPLES

(help others get the justice that they deserve)



BUY™

SELL™

SHOP™

www.TextBookDiscrimination.com

Get ***Booked Up*** on Justice!

© TBD Corporation. All Rights Reserved.

UNITED STATES DISTRICT COURT,
STATE OF COLORADO
901 19th St, Room A105, Denver, CO 80294-3589

Plaintiff: ALEA R. KENNEDY,

v.

Defendants: AVANTI RESIDENTIAL,
LLC, et. al.; AVANTI
RESIDENTIAL -
FITZSIMMONS, LLC, et. al.

▲ COURT USE ONLY ▲

Case No.:

Division:

COMPLAINT AND DEMAND FOR TRIAL BY JURY

The Plaintiff, International Police Agent Alea Rachel Kennedy, appears humbly and respectfully before the Honorable Court as sua sponte litigant, to advance the following Complaint against Defendants Avanti Residential, which is a branch of Avanti Residential, LLC, of Delaware; Avanti Residential - Fitzsimmons, LLC, et al, of Colorado, which is a branch of

Avanti Residential Fitzsimmons, LLC, of Delaware; hereafter collectively known as “Avanti,” seeking damages well in excess of \$75,000, to be proven at trial; comprising liquidated, actual, expected damages, punitive, compensatory, and exemplary damages; including any and all fees attendant to this legal action. Such damages arise from the aforementioned Defendants’ alleged violations of Colorado’s Anti-Discrimination Act, Title VII, and the Americans with Disabilities Act. The Plaintiff seeks the award of judgment in her favor, and any and all damages that the Court deems just and equitable, in application of relief.

CLAIMS UPON WHICH PLAINTIFF REQUESTS THE GRANTING OF RELIEF

The Plaintiff brings this Complaint, respectfully before the Honorable Court, and the public at large; on the basis of violations of Colorado’s Anti-Discrimination Act, C.R.S. §§ 24-34-501-24-34-510 (2022) et. seq.; the Americans with Disabilities Act, 42 U.S. Code §§ 12101-12102, et. seq.; and the Fair Housing Act, Title VIII of the 1968 Civil Rights Act, 42 U.S.C.A. §§ 3601-3631, et. seq., as an affront to the laws of Colorado and the United States: and advances the bases for relief on thoroughly-documented, well-supported claims, with the inclusion of Colorado and United States Attorney’s General’s Right to Sue Letters, in substantiation.

INTRODUCTION

1. This case concerns Avanti’s discrimination against Alea R. Kennedy, in the context of violations of Colorado’s Anti-Discrimination Act, C.R.S. §§ 24-34-501-24-34-510 (2022) et. seq.; the Americans with Disabilities Act, 42 U.S. Code §§ 12101-12102, et. seq.; and the Fair Housing Act, Title VIII of the 1968 Civil Rights Act, 42 U.S.C.A. §§ 3601-3631,

et. seq.—specifically in the context of the Plaintiff’s five-company employment case, which had its inception and pretense by and through Defendants’ actions, and as supported by the attached Attorney General’s Right to Sue Letters (issued in the employment matter following a Substantial Weight Review with the EEOC, followed by the Regional Director’s embedding in the Plaintiff’s former, and compromised, apartment). Notice of the Plaintiff’s having won the Right to Sue in the employment matters was presented on December 11, 2023, as a result of a subsequent leasing professional’s withholding of correspondence; in attempted prevention of this action. Denver’s EEOC Regional Director was subsequently embedded in the apartment where the employment action concluded. Avanti assumed a mental health disability in the Plaintiff where none had ever existed, and allowed for her medical mistreatment in such context; at the site of her residence, at Forum Fitzsimmons.

2. Defendants built themselves an illegal dynamic on such basis of the Plaintiff’s assumed disability, in which they subjected Plaintiff to a state of subjugation in the apartment, and in the context of the leasing agreement; itself pretexted upon their illegal assumption of a mental health disability where none had ever existed, in the regarding of Plaintiff as being disabled, against any history of mental illness. At all times pertinent to the alleged leasing contract, of which Defendants were in breach, the Plaintiff endured comportment by the Defendants and their accomplices and fiduciaries that was obscenely inappropriate; by and through the means and mechanism of their erroneously regarding Plaintiff as being disabled, where no disability has ever presented.
3. In such unlawful and discriminatory assumption of disability, the Plaintiff was subjected to medical treatment in the apartment, as distributed by unlicensed practitioners. The

Plaintiff was also subjected, inappropriately, to her own former, faked psychiatric nurse practitioners in the workplace (who never had medical background or training); who had only diagnosed the Plaintiff with insomnia and ADHD, after cursory interview, years prior. The Plaintiff suffered unduly at the hands of such negligent practitioners, who treated Plaintiff in such a way with which no medical practitioner could reasonably agree, upon the basis of completely clear diagnoses; to the Plaintiff's recognizance, and as recorded. On 12/20/2023, Jamie Cutright Fischer stood outside of the Plaintiff's former apartment and screamed a full confession to the aforementioned alleged crimes.

4. In so doing, Avanti evidenced their compromise of the leasing contract that existed between the company and Plaintiff, and the company's reliance upon an alternative and completely fictitious healthcare history; as fraudulently and negligently for Plaintiff, provided by the Plaintiff's estranged biological father, in the context of his infamous case of Munchausen's by Proxy, which precipitated the Plaintiff's designation in childhood as a Child Called It. Such breach of contract was made upon the basis of such erroneous regarding of the Plaintiff as being disabled; to be litigated as a separate civil matter.
5. The Plaintiff's hiring at Modivcare coincided with the departure of former C.E.O. Daniel Greenleaf, who was replaced by C.E.O. Heath Sampson, *after quitting from the Plaintiff's apartment with Defendants, upon the pretense of the revelation of the human rights conspiracy surrounding the Plaintiff, which would affect her and her workplace—and* Plaintiff so brings this action; having reserved her right to pursue litigation in such matters against Mr. Sampson as agent and fiduciary of Defendant Modivcare, in joint and several liability.

6. The Plaintiff was retaliated against by Defendants upon assumption of the leasing contract, when she was immediately subjected to the imposition of Jamie Cutright Fischer's dragging her screaming through the leasing office; for the sake of a neurological surgery, and with Defendants in the Plaintiff's attendant employment law cases at presence. In the context of such an arrangement, the Plaintiff's health and safety were routinely compromised; resulting in the major civil and human rights violation, endured by Plaintiff to this day.
7. As a result of Defendants' negligent assumption of a disability in Plaintiff where none has ever presented or existed, the Plaintiff was subjected to acts of gene theft performed by Jamie Cutright Fischer, a transperson offspring of high-levels and psychiatric orderly who falsified their own professional credentialing, as well as the Plaintiff's psychiatric and spine care records; and a cutting physical assault; performed by employment law Defendant Sandra Miller, and at the apartment provided by Defendants. Throughout the period of Plaintiff's holding the lease, Defendants subjected the Plaintiff to a completely insecure apartment; which was the subject matter of numerous conversations between the Plaintiff and Defendant management.
8. Plaintiff has had an eighteen-year career in military, intelligence, and policing, and took a prominent role within the Trump Administration's Coronavirus Task Force. The Plaintiff's residence with Avanti was a matter of intelligence, in the Plaintiff's attempt to end the illegal, pseudo-psychiatric and sexual conservatorship dynamic that exists in her enslavement, against the interests and auspices of the United States Constitution.
9. As such, Avanti discriminated against the Plaintiff in the course of her employment, and retaliated against the Plaintiff when they allowed for the breach of her privacy and safety,

upon her assumption of the leasing contract. Avanti committed such retaliatory and discriminatory acts in defiance of Colorado's Anti-Discrimination Act, C.R.S. §§ 24-34-501-24-34-510 (2022) et. seq.; the Americans with Disabilities Act, 42 U.S. Code §§ 12101-12102, et. seq.; and the Fair Housing Act, Title VIII of the 1968 Civil Rights Act, 42 U.S.C.A. §§ 3601-3631, et. seq.; and Plaintiff so brings this claim for relief before the Honorable Court.

JURISDICTION, PARTIES, AND VENUE

10. The Plaintiff, Alea R. Kennedy, was a resident of Arapahoe County at the time that the factual nexus of events transpired, and now keeps offices in Las Vegas, Nevada.
11. In the context of its conducting business operations at Forum Fitzsimmons, Avanti Residential, LLC ("Avanti") is a corporation with its principal place of business in Englewood, Colorado.
12. The Court has jurisdiction over this matter in the context of C.R.S. § 24-34-306 and C.R.S. § 6-1-103. Venue in this Court is proper in the circumstance, as Defendant's housing of Plaintiff, in violation of CADA, Title VII, and the ADA, transpired in Aurora, Colorado. C.R.S. § 24-34-306. The Defendant's principal place of business is in Arapahoe County. C.R.S. § 6-1-103.
13. The Plaintiff has exhausted all administrative remedies prior to taking this action, as necessitated by C.R.S. § 24-34-306.
14. The Court presents specific jurisdictional capacity in the context of all Defendants; including Defendants Avanti, under *Parocha*, "an out-of-state party's harassment of, or threatening of or attempt to coerce an individual known by the non-resident to be located

in Colorado is a tortious act sufficient to establish personal jurisdiction under Colorado's long-arm statute, C.R.S. § 13-1-124 (2007), and "that such conduct creates a sufficient nexus between the out-of-state party and Colorado to satisfy the requisite minimum contacts such that the exercise of jurisdiction by a Colorado court to enter a protection order comports with traditional notions of fair play and substantial justice." 2018 CO 41, quoting *Parocha v. Parocha*, 17SC406. Under the *Magill* test, (1) Defendant's contacts with Colorado are continuous, and systematic and significant; and (2) as such, Defendants are essentially "at home" in Colorado. *Magill v. Ford Motor Co.*, 2016 CO 57, ¶ 15 (quoting *International Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945)).

15. This Court has jurisdiction over the subject matter of the present action, pursuant to C.R.S. § 15-10-302.

16. The Plaintiff has exhausted all administrative actions, attendant to C.R.S. § 24-34-306.

The Plaintiff has committed this filing in advance of 3/10/2024—the deadline of the expiration for the period of viable exercise of the Attorney General's Right to Sue letters in the employment context; with deference requested for the nature of the employment law matter's being exacerbated by its situation in this housing context, and further notice presented of the due process violation in the EEOC's Regional Director's embedding in the apartment where the employment dynamic concluded. Americans with Disabilities Act of 1990, § 2 et seq.. 42 U.S.C.A. § 12101 et seq.

17. The Plaintiff brings this Complaint, justifiably, under Colorado and Federal law, and within the bounds of the stipulation that in the context of discrimination, Plaintiff herein filed suit within notice of 90 days of certain agency action; being the receipt of notice of the award of an Right to Sue letter under Federal law; see 42 U.S.C. § 2000e-5(f)(1).

18. The events, transactions, interactions, and occurrences forming the factual nexus and subject matter of Plaintiff's complaint against Defendant transpired within Colorado's 18th Judicial District, and/or whilst the Plaintiff was a resident of the 18th District of Arapahoe County, Colorado. C.R.S. § 13-1-124; C.R.S. § 15-10-302.

GENERAL ALLEGATIONS

Avanti Assumed a Disability in Plaintiff Where None Had Ever Existed

19. The Petitioner is a highly-credentialed intelligence agent, who; as a result of her divorce and custody battle, was extensively documented as being mentally well, prior to the obvious falsification of her psychiatric records, as produced by individuals who themselves falsified their psychiatric credentialing. Throughout her period of leasing with Avanti, Defendants have treated the Petitioner to psychiatric and sexual torture, in overt attempt to undermine the Petitioner's credibility as a credentialed international superagent, and in furtherance of their crimes. The Petitioner has never demonstrated any kind of psychological illness; only insomnia, ADHD, and grit. In their highly illegal treatment of Petitioner for a mental health malady that the Petitioner has never demonstrated, Avanti committed very serious, dramatically egregious breaches of the Americans with Disabilities Act.
20. The Plaintiff does not complain of the mere lack of a disability; nor of being regarded as being mentally disabled where no mental health issues have ever presented. The Plaintiff here makes complaint about the due process challenging discrimination that she experienced with Avanti; where her lifelong history of ADHD and insomnia were conflated with her neurological injury, which was itself aggrandized against the military

service that saw her equipped with the neurological implant deployed as such that she could not not walk in the imposition of such interference, couched in Avanti's negligence, in regarding Plaintiff as being mentally disabled enough to not recall or exact justice in the actuality of the circumstance.

21. The apartment provided by Defendants Avanti was always compromised, in Plaintiff's being subject to unorthodox psychiatric and psychosocial practices; hosted by alleged frauds and charlatans, throughout the course of her leasing agreement. The Plaintiff reserves her right to try the breach of contract, fraud; and other tortious claims separately from this claim, should settlement not be reached in the course of these proceedings, and recognizes such distinct liability for the sake of these claims' preservation.
22. Avanti subjected Petitioner to admitted acts of harassment, assault, and battery by Marlene Bizub, Emily McCollum, and Jamie Cutwright, and others; pretended upon a psychiatric diagnosis that the Petitioner has in no way ever demonstrated. In so doing, Avanti assumed a disability in Petitioner where one has never existed; in negligent conversion of her contract of leasing, and in violation of the Americans with Disabilities Act, in the context of disability discrimination.
23. Nothing about the aforementioned actors conduct was either conscionable; nor applicable to any illness or malady ever demonstrated or applicable to Plaintiff.
24. As subjects of Plaintiff's sua sponte litigation in Colorado's 18th District, the Plaintiff recently caught Cutwright and McCollum falsifying Petitioner's psychiatric records; in an effort to affect this very case. At Avanti, these women and their fiduciary accomplice treated Petitioner in such a way with which no reasonable medical professional would ever agree; including for a case of psychosis that has never evidenced, against medical

advisement (and McCollum's stated course of diagnosis and medical treatment), and any rational interest on behalf of Respondents. Avanti allowed these actors, and their accomplices in Nicole Kennedy (Plaintiff's developmentally disabled ex husband's sister and daughter), Marlene Bizub, and others; to electrocute Petitioner with an AED unit, and to parade Petitioner around naked, each and every time that she used the restroom or shower at home. In an act of group hysteria, reminiscent of the Stanford Prison Experiment; these actors used Defendants Avanti as a means of self-legitimacy, and to normalize Plaintiff's psychiatric torture.

25. The FBI were made aware when Marlene Bizub paraded the Plaintiff from her Avanti apartment in the nude, across the street, by and through the use of her military implant. Plaintiff caught Jordan Ferree (from Plaintiff's prior employment) at Modivcare on an HR person's Zoom call, at orientation. Bizub was also photographed leaving the apartment more than once, including in March, 2021; and in light of the FBI's ignorance of Plaintiff, the Plaintiff knew that she would be forced to build her own case. The Plaintiff then proceeded to document tens of thousands of records of Marlene Bizub's, Emily McCollum's, and Jamie Cutright Fischer's illegal practice of medicine at Modivcare, as applied to Plaintiff; hundreds of case-breaking, confirmatory incidents, and thousands of incidents of stated and constructive discrimination.
26. The Plaintiff recently caught confirmation of the human rights dynamic surrounding her existence upon the admission of her estranged, rapist, biological father; in the matter of the 18th District's 23CV212. Jerry Lee Moore has confirmed his inappropriate interaction with the Plaintiff in the context of the 18th District's 23CV308; where he allegedly left his own phone number behind the Plaintiff's Priceline account, resulting in months of

alleged stalking, brutal assault, and additional liability, hosted in its ongoing development as a deposition, at [HTTPS://Tinyurl.com/NVDeposition](https://tinyurl.com/NVDeposition).

27. This alleged crime also constituted an ADA violation in encouraging harassment in the context of the Plaintiff's home environment. On more than one documented occasion, the Plaintiff was subjected to the extreme and negligent conduct of her peer-employees, including at the apartment; on the basis of such assumed disability. The Petitioner was electrocuted in the head with an AED unit, was used for sexual stimulation, and was called 911 over, when her peers and captors became bored at work and would follow her to the apartment during periods of time, transpiring off the clock; or in an effort to exceed the Plaintiff, professionally.
28. In the context of her CCRD/EEOC Rebuttal and the legal arguments contained therein, with factual basis provided in the attached Affidavits; the Plaintiff provided a prima facie case of the Defendants' retaliatory regarding the Plaintiff as being disabled. The Plaintiff's claim succeeds on the basis of Avanti's assumption of a disability where none ever existed, against the auspices of the Americans with Disabilities Act. The Plaintiff will prevail on the basis of her **Title II, ADA, and CADA** claim because but for Avanti's assumption of said mental health disability where none ever applied, the Plaintiff would not have undergone such harm; including the Plaintiff's five-company employment case, liability pertaining to which was allegedly incited by Defendants.
29. The Plaintiff in fact raised exception to such harassment, as predicated on the assumed disability, on numerous occasions; including when she was harassed and subsequently attacked by a female security guard, on-site. The Plaintiff complained of her gaslighting abuse in bringing notice of such occurrence to both her manager, and the company's

Chief Information Security Officer. The Plaintiff complained of Defendant's psychiatric and sexually-pretensed torture directly to Modivcare's former CEO, Dan Greenleaf; who quit on the spot, rather than compromise Modivcare as a recipient of Medicare and Medicaid business. The entire dynamic predicated the employment law case was couched in Defendants Avanti's liability, with its inception at the property. The dynamic was so abusive that the Plaintiff was trafficked back to every apartment where she had lived; on the night that Modivcare made the decision to carry on this civil rights abusive dynamic.

30. With the assumption of the mental health disability assumed by Defendant and applied to Plaintiff; and with Plaintiff's first overnight with the company hallmarked with a Modivcare-provided, logged and documented trip to a hospital, from the Avanti apartment, for a neurosurgery, any further requirement notice of Plaintiff's exception to such harassment is void for public policy. The Plaintiff here complains of Defendant Avanti's mistreatment of the Plaintiff as a human being; with Plaintiff not having provided the company with any disability, and not having the ability to complain to any competent or compliant authority of her harassment, abuse, and retaliation at Avanti—short of those outside of the company, in the CCRD and EEOC.
31. The Plaintiff discussed these concerns extensively, outside of the company, and in the course of her leasing contract; with the Congressman she was dating during the period of time concerned. The Plaintiff further discussed her concerns extensively with the Federal Bureau of Investigation, as Avanti constantly provided the Plaintiff for such opportunity, in all of their documented, alleged criminality.

32. As further provided by the ADA, the Plaintiff has a right to be free from retaliation or interference if he or she acted reasonably and in good faith; which she did, in the course of taking on contract of housing with Avanti. The Plaintiff was a woman tortured at Avanti; tortured on the basis of the assumption of a disability where none has ever existed. Avanti took an adverse employment action against the Plaintiff when they immediately breached her leasing contract upon its assumption, and did so because of Petitioner's being a healthy, non-mentally disabled intelligence agent and woman in defiance of Defendants' negligence in leasing administration and business operation.
33. The Plaintiff would not have been laid off but for the Defendant's assumption of a disability in Plaintiff where none has ever applied; and the Plaintiff was retaliated against, throughout her employment and in the context of her housing (and trafficking to the apartment, after the fact) at Avanti, for being completely healthy in defiance of the regarded as disabled narrative, as direct result of Defendants' negligence.

Avanti Exacerbated an Existing Disability in Plaintiff in Disparate Treatment, and Created a Distinct Disability Where None Had Ever Existed in an Exercise of Disparate Impact, in the context of Erroneously Regarding Plaintiff as Being Mentally Disabled, and then Failed to Accomodate

34. This allegation, as highly specified, amounts to the Plaintiff's exception with Avanti's non-granting of reasonable accommodation in the form of a change of lock, even as they regarded Plaintiff as having a mental health disability, where none had ever presented. The Plaintiff's requests and subsequent denials of a change of lock for the only mode of ingress and egress—the means by which she was being abused, by and through the entrance of Cutright Fischer, Bizub, and those aforementioned; all qualify as protected activities under the ADA, and were denied by both Michele White, who was the manager

who interviewed the Plaintiff upon first occasion of their meeting, and by corporate management, upon every opportunity of Plaintiff's request. The Petitioner therefore advances the ensuing claims against Avanti; upon substantiated and undeniable factual basis, and suggests that discovery will present further evidentiary basis in substantiation of this claim's validity. *Laguna v. Chester Housing Authority, E.D.Pa. 2022, 2022 WL 2953687.*

35. The Plaintiff has never had any mental health disability, whatsoever; nor has stated or indicated any reason for Defendants Avanti's interest in such abstractions. The Plaintiff has, however, endured a very serious head injury; resulting in the placement of a neurological implant, which has its technological basis in the Plaintiff's military service. With the existence of such an implant unquestionably present, and substantiated in the inclusion of Exhibit C, which also provides Plaintiff's only intelligence credentialing in the field, the Plaintiff wishes to clarify that she cannot not walk unassisted 100% of the time for the influence of this neurological implant; which is itself a disability, and which exacerbates the Plaintiff's only actual psychiatric diagnoses, which are ADHD and insomnia.
36. In providing access to the apartment by Plaintiff's stalkers, on the basis of such erroneous regarding of Plaintiff as being disabled, Defendants Avanti discriminated against Plaintiff—and they did so in the exact way that Plaintiff's two Attorney General's Right to Sue letters describe, in regarding Plaintiff as being mentally disabled enough to not recall or object to their allowing the Plaintiff's stalkers into the building, and into the Plaintiff's apartment. Defendants Avanti allegedly did so in the denial of Plaintiff's military and actual health history, in what would amount to the provision of an

confabulated psychiatric and social advanced directive, which was as fabricated as the credentialing of those in commission of the act, and of the circumstance.

37. In disparate treatment of the Plaintiff's lifelong insomnia diagnosis, which eventually was joined by a secondary diagnosis of ADHD, Defendants Avanti allegedly allowed alleged psychiatric frauds Marlene Bizub and Jamie Cutright Fischer into the building, to practice medicine on the Plaintiff; in the absence of any history of any mental illness whatsoever, and in the complete absence of any valid medical credentialing. Marlene Bizub is the subject of multi-agency interest in the matter of child pornography produced at Modivcare, and whose alleged commissioner was involved in a stabbing and hammer attack, along with various acts of due process violation that constitute fraud. She spent a lifetime holding herself out to be a psychiatrist for the El Paso County Courts, on the basis of falsified psychiatric credentialing (the Eisner Institution is a non-degree granting institution), and challenging others' credentialing in the civil arena; even as her husband ran a filmography company, which was allegedly involved in the commission of such acts. Jamie Cutright Fischer is an orderly who screamed confession to the entire conspiracy (to be tried separately) on the street corner at Spectra Paradise—the former location of the Plaintiff's policing case, as Epstein investigator—just before Judge Toussaint (who wrote in the Colorado custodial action predicated these actor's involvement, when they cleared Plaintiff in *Sorensen* hearing with the original attorney in *Sorensen*, about the “third-party not thinking that a DNA test would be an issue [describing Plaintiff's Spectra-based policing partner, and the father of her children]” and to “get the kid out to Ohio,” presumably for further due process violation) dismissed the

action. Their alleged criminality continues to this day—all at the alleged influence of Defendants Avanti.

38. Defendants Avanti's comportment constituted more than just stray remarks from random security guards or leasing and maintenance personnel—Defendants' allowing a security guard to lock the Plaintiff into a trash chute room, and disallowing the replacement of a door code, and allowing Plaintiff's fraud/stalker psychiatric-witnesses on-site, to pretend to practice the kind of medicine that was dangerous to the Plaintiff, and resulted in the Plaintiff's ongoing and egregious gene theft. Such comportment constituted a opropobros of oppression, made upon the basis of discrimination that was so egregious as to constitute retaliation. *Luka v. Bard College, S.D.N.Y.2017, 263 F.Supp. 3d 478.*
39. With or without the necessity for the provision of reasonable accommodations on the part of Defendants, Plaintiff did not enjoy a housing relationship free from discrimination, which definitely occurred in the context of the ongoing interference of Defendants' Avanti's accompi's presence in Plaintiff's current leasing and livery arrangements; which occurred on the basis of Plaintiff's being regarded as disabled where no disability has ever presented, and Plaintiff so brings this action before the Honorable Court.

Proceedings before the Civil Rights Division

40. The Plaintiff's Complaint was set before the Colorado Civil Rights Division ("CCRD") on April 10, 2023.
41. Initial correspondence in support of the Plaintiff's Complaint, between she and the Division, transpired on 5/10/23, and concerned the subject of Plaintiff's paychecks.

42. The Plaintiff had an interview with the CCRD's Benjamin Ward over the phone on 5/25/23. In the context of this conversation, the Plaintiff received intelligence instruction from Mr. Ward regarding this case's viability and validity, having been overtly demonstrated in the public sphere.
43. The CCRD Complaint was filed on 6/22/23.
44. The Defendant's Response contained absolutely no denial of Cutright Fischer, McCollum, Kennedy's, or Bizub's inappropriate presence; or treatment of Plaintiff in the context of her employment, whatsoever. The Response, instead, denied that Plaintiff ever spent a significant period of time working in Defendant's office; a fact which it controverts, later in the writing, and which is materially inaccurate.
45. Plaintiff made Rebuttal on 9/15/23.
46. Plaintiff had a conversation with the CCRD's Jazmin Perez on 9/19/23, in which it was indicated to Plaintiff that the CCRD would be investigating the matter.
47. The Plaintiff was issued an finding of No Cause by the CCRD on 10/19/23, and requested the EEOC's Substantial Weight Review on 11/1/23.
48. It was after the fact that Plaintiff caught proof of the investigation's compromise, in EEOC Regional Director **Jerilyn Nunu**'s being housed in the unit, where leasing personnel Jackie Graham Roberts Dillon began her campaign of terror, theft, and due process compromise; in an effort to affect this very legal action.

FIRST CLAIM FOR RELIEF
Violation of Colorado Anti-Discrimination Act
C.R.S. §§ 24-34-501–24-34-510 (2022) et. seq.

49. Plaintiff herein incorporates the legal and factual basis contained in all other paragraphs in this Complaint.
50. At all times relevant to this Complaint, Plaintiff was defined as an “Aggreived person,” whose disabilities, both real and regarded as, caused her to endure housing discrimination in under the auspices of a restrictive covenant. C.R.S. §§ 24-34-501.
51. At all times relevant to this Complaint, Defendant refused to rent and lease housing on a bona fide basis, as provided for in the context of the restrictive covenant agreed upon by all parties. Plaintiff alleges discrimination on the basis of disability, suggested unequivocally in the ongoing involvement of the aforementioned actors and alleged accomplices, in Plaintiff’s ongoing police work. C.R.S. § 24-34-502.
52. As the Plaintiff’s provider of housing, Defendant had a duty in non-violation of the restrictive covenant, in acts of discrimination, on the basis of an assumed disability where none had ever existed, and in not exacerbating the Plaintiff’s existing insomnia and lifelong ADHD.
53. As the Plaintiff’s provider of housing, Defendant had a fiduciary duty of care in non-harassment of the Plaintiff, in the context of such assumed disability; including, but not limited to, the Plaintiff’s subjection to alleged assaults on the part of other employees, and former associates; who Defendant allowed to harass Plaintiff in their own employment of, and association with, such actors.
54. As the Plaintiff’s provider of housing, Defendant had a duty of non-retaliation to the Plaintiff on the basis of collection of rental fee payments; in the context of the assumption of a disability that undermined her employment, exacerbated in the housing context, which Defendant violated.

55. As the Plaintiff's provider of housing, Defendant violated their duty of non-retaliation to the Plaintiff on the basis of sex; in the context of the assumption that Plaintiff would suffer through an induced disability that undermined her employment and livelihood, as well as her quiet enjoyment of the restrictive covenant and ability to live, and being as how Defendant was aware that Plaintiff was fighting for the custody of her child.
56. As the Plaintiff's housing provider, Defendant violated a duty of non-retaliation to the Plaintiff on the basis of sex and religion; in the context of the assumption of a disability that undermined her employment and access to safe housing, and where the Plaintiff was discriminated against for her non-acceptance of allegedly company-standard, Unitarian sexual practices, which included mass pregnancy testing overnight, and public, group sex. But for the Plaintiff's status as a woman and Jew, she would not have been retaliated against, at Avanti.
57. Defendant violated their duty in non-violation of discrimination in their retaliation against Plaintiff; including, but not limited to, Defendant's actions having harmed the Plaintiff's status as an lessee, including in the context of terms, conditions, and privileges as an lessee. This dynamic occurred both during, and following; the Plaintiff's housing at Avanti, and the Plaintiff so brings this claim for relief.

SECOND CLAIM FOR RELIEF
Violation of the Americans with Disabilities Act
42 U.S. Code §§ 12101–12102, et. seq.

58. Plaintiff herein incorporates the legal and factual basis contained in all other paragraphs in this Complaint.

59. At all times relevant to the factual circumstance described in the context of this litigation, Defendant Avanti assumed a disability in Plaintiff, and exacerbated an existing, harmless disability—a former head injury, resulting in neurological implant—to the Plaintiff's extreme detriment.
60. Defendant Avanti further assumed that such disability where none had ever evidenced, by Plaintiff; which substantially limited Plaintiff in such a way as to interfere with her everyday activities.
61. The Plaintiff alleges Defendant's malfeasance in furtherance of the exact conditions described in the Americans With Disabilities Act; including, but not limited to, those heretofore included at factual basis.
62. The Plaintiff alleges retaliation and discrimination against the Plaintiff, by the Defendant, on the basis of a disability, as defined under this act.
63. The Plaintiff, further, alleges the assumption of such disability, on the part of Defendant, as applied to Plaintiff, where none had ever existed, in applicable violation of this act; and being regarded as having an impairment.
64. Plaintiff alleges that she was subjected to actions prohibited because of an actual or perceived physical or mental impairment, and suffered unduly due to the affect such persecution had on her neurological implant.
65. The Plaintiff alleges prima facie malfeasance on the part of Defendant, and having evidenced such discrimination on the basis of Plaintiff's being regarded as having an impairment and disability, in the context of the factual circumstance; and with the two Attorney General's Right to Sue letters attached.

66. The Plaintiff further alleges that Defendant's erroneous assumption in regarding Plaintiff's as having a disability is, and always has; been known to the Defendant, through the course of her entire habitation of the agreed-upon unit. The Plaintiff further alleges Defendant's familiarity with Plaintiff's military affiliation, existent through the duration of the restrictive covenant.
67. The Plaintiff was disabled by the injury she endured affecting her head, which completely preexisted the lease, and which pertained to the Plaintiff's specialized military service; and which Defendant failed to reasonably accommodate, in her requesting a change in locking mechanism to her only door.
68. The Plaintiff was forced to live and work through her Defendant-inflicted disability and convalescence—a precipitated form of Havana syndrome; and retaliated against Plaintiff in provision of discriminatory housing services and situation.
69. The Plaintiff further alleges that Defendants Avanti opportunized upon their misconception of a disability in Plaintiff, in furtherance of, and in their alleged attendant and contiguous criminal activity; which was predicated upon their housing of the Plaintiff, and upon their intentional regarding of an International police agent, as an unfounded, unsubstantiated, and grievous case of mental illness, which necessitated Defendant's corporate-officialized, inappropriate intervention.
70. The Plaintiff alleges that the dynamic that exists in the regarding of her having a disability where none had ever presented that exists to this day, and which affects the Plaintiff to extreme detriment, was established and officialized at Avanti.
71. Plaintiff herein incorporates the legal and factual basis contained in all other paragraphs in this Complaint.

72. Plaintiff alleges discrimination on the basis of her sex; where the Plaintiff was made to work through injury in the absence of reasonable accommodation, due to her moving on; romantically, from her manager.
73. Plaintiff alleges discrimination on the basis of her religion; where she was known to her peers as a Jew, and alleges the incitement of an pretext of violence against the Plaintiff, in discrimination against Plaintiff.
74. Plaintiff alleges discrimination on the basis of her national origin; where she was known to her peers as a Russian, and alleges the incitement of an pretext of violence against the Plaintiff, in discrimination against Plaintiff.
75. The Plaintiff's taking concerns of retaliation to both Manager Michele White and corporate offices qualify as protected activity, where she conveyed to Avanti her concern that the Defendant had engaged in an unlawful, discriminatory practice in the sexual harassment that Plaintiff had endured; the subsequent discrimination endured by Plaintiff serves as the actualization of that retaliation.
76. In each context of retaliation aforementioned, the Plaintiff has demonstrated a causal connection existent between the protected activity, and the adverse housing actions; which occurred on a continual and daily basis, in advance of her termination of the restrictive covenant, and following her departure from the company's property.

THIRD CLAIM FOR RELIEF
Violation of the Fair Housing Act
Title VIII of the 1968 Civil Rights Act
42 U.S.C.A. §§ 3601–3631, et. seq.

77. Plaintiff herein incorporates the legal and factual basis contained in all other paragraphs in this Complaint.

78. At all times relevant to this litigation, Defendants Avanti unlawfully discriminated against Plaintiff, in the terms of the rental of her apartment dwelling, and in the provision of services and facilities in connection therewith. The Plaintiff alleges that the Defendants did so on the basis of race, sex, disability, national origin, and otherwise; whether distinctly or in any given fashion, and to Plaintiff's detriment, in all of Defendant's discrimination.
79. The Plaintiff further alleges that Defendants Avanti "[made], print[ed], or publish[ed], or cause[d] to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination," specifically as pertaining to the Plaintiff, and her perceived limitation; and that such discrimination on the part of Defendant was "based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination."
80. The Plaintiff further alleges that Defendants profited specifically on the basis of her being housed in the context of the restrictive covenant, on-site; at the facility.

FOURTH CLAIM FOR RELIEF
PUNITIVE DAMAGES

81. Plaintiff realleges all factual and legal arguments contained in the paragraphs above, and incorporates the same herein by reference.
82. At all relevant times, Defendants owed Plaintiff a duty to act with due care and regard for Plaintiff's rights, safety, and interests as a consumer, and to conduct the Greystar and Psyche distinct contractual agreements, as offered in the context of good faith and fair business dealing.

83. Defendants breached that fiduciary duty to Plaintiff on more than one occasion, and such breaches constitute outrageous conduct and reckless disregard of the rights, safety, and interests, including financial and property interests, of the Plaintiff.

84. Accordingly, Defendants are liable for punitive damages in the amount of millions, to be proven at Trial. The Plaintiff herein advances claims that suggests the award of compensation for each and every egregious infringement upon her personal safety and security.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully requests that this Honorable Court enter judgment in her favor against each of the Defendants, and grant her relief as allowed by law and equity; including, but not limited to;

(a) Declaratory and injunctive relief, as appropriate,

(b) Past and future economic losses on all claims allowed by law, including but not limited to lost earnings, medical expenses, and moving expenses, in an amount to be determined at trial;

(c) Compensatory and consequential damages, including, but not limited to, damages for emotional distress, loss of enjoyment of life, and other pain and suffering on all claims allowed by law an amount to be determined at trial;

(d) Punitive damages on all claims allowed by law and in an amount to be determined at trial;

(e) Attorneys' fees and the costs associated with this action, including expert witness fees, on all claims allowed by law;

(f) Pre- and post-judgment interest at the lawful rate;

(g) Any further relief that this Court deems just and necessary, and any other relief as allowed by law.

JURY DEMAND

The Plaintiff demands a jury on all issues so triable.

Respectfully submitted,



Alea Kennedy, Plaintiff/Sua Sponte Litigant
1101 Tropicana Rd #2121
Las Vegas, NV, 89119
aleamoore@gmail.com
(234) 650-1977

ATTACHMENTS

- **Exhibit A - Unsworn Declaration Containing Colorado Attorney General's Right to Sue Letter; which is attached**
- **Exhibit B - Unsworn Declaration Containing United States Attorney General's Right to Sue Letter; which is attached**

- **Exhibit C - Plaintiff's neurological implant and intelligence credentialing**

BUY™

SELL™

SHOP™



Downloaded From
www.TextBookDiscrimination.com



SELL YOUR OWN SAMPLES

(help others get the justice that they deserve)



BUY™

SELL™

SHOP™

www.TextBookDiscrimination.com

Get ***Booked Up*** on Justice!

© TBD Corporation. All Rights Reserved.