

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

EMMA CARMICHAEL,)	
)	
Plaintiff,)	
)	Case No.:
v.)	
)	Div. No.:
770 MANAGEMENT, LLC,)	
)	
Serve:)	
Josh Gould)	
7828 Laclede Forest Drive)	
Saint Louis, MO 63143)	
)	
Defendant.)	JURY TRIAL DEMANDED

PETITION

Plaintiff Emma Carmichael brings this claim under the Missouri Human Rights Act, R.S.Mo. §213.010, *et. seq.*, for sex discrimination, sexual harassment, and retaliation by Defendant 770 Management, LLC. In support of her Petition, Plaintiff states the following:

GENERAL ALLEGATIONS

1. Plaintiff Emma Carmichael is a female person and currently a resident of the state of California. At all times relevant herein, Plaintiff worked for Defendant in or about St. Louis, Missouri.
2. Defendant 770 Management, LLC is a Missouri company organized pursuant to the laws of the State of Missouri and is located at 311 Belt Ave., St. Louis, MO 63112.
3. Defendant is an employer, as defined by the Missouri Human Rights Act (MHRA), Mo. Rev. Stat. § 213.010(8), in that Defendant employs six (6) or more persons.
4. At all times relevant to the allegations in this Petition, Defendant was Plaintiff's employer within the meaning of R.S.Mo. §213.010(8).

5. Venue in this Court is proper because the allegations that gave rise to this action occurred in St. Louis, Missouri.

6. On November 14, 2024, Plaintiff cross-filed a charge against Defendant with the Missouri Commission on Human Rights (“MCHR”) and the Equal Employment Opportunity Commission alleging sex discrimination and retaliation.

7. Plaintiff received a Notice of Right to Sue letter from the MCHR on October 30, 2025. See Exhibit 1 attached hereto.

8. This action is filed within two (2) years of Defendant’s discriminatory and retaliatory conduct and within ninety (90) days of receipt of the Notice of Right to Sue.

9. Plaintiff has complied with the administrative exhaustion requirements of the MHRA as stated in Mo. Rev. Stat. § 213.075.

FACTUAL ALLEGATIONS

10. Defendant is a property management company.

11. Plaintiff worked as an Assistant Accountant, then as a Property Manager and Maintenance Director for Respondents at various sites, including 311 Belt Ave., St. Louis, Missouri 63112, from about January 5, 2023, to May 30, 2024.

12. Plaintiff reported to Defendant’s owner, Lyle Weisman, throughout her employment with Defendant.

13. During her employment with Defendant, Plaintiff performed her job duties and responsibilities in a satisfactory manner.

14. On or about June 14, 2023, Defendant’s manager, Yossi Malka, asked Plaintiff to join him for drinks. Plaintiff declined the drink.

15. Malka expressed disappointment and pressured Plaintiff to accept.

16. At the time Defendant's manager asked Plaintiff out for drinks, Plaintiff was nineteen (19) years old.

17. Defendant and Defendant's manager were aware that Plaintiff was nineteen (19) years old at the time.

18. On information and belief, Malka made inappropriate sexual advances and comments toward other female employees of Defendant.

19. On information and belief, Malka also made inappropriate advances and comments to residents of Defendant's property.

20. On more than one occasion, Plaintiff observed Malka asking a female employee for a hug or asking them out on a lunch date.

21. On information and belief, Malka sent sexually inappropriate text messages to female employees of Defendant as well as residents of Defendant's properties.

22. During Plaintiff's employment, Lyle Weisman, owner of Defendant, ogled Plaintiff and made comments that Plaintiff looked like his wife.

23. During Plaintiff's employment, groundskeeper Harris Brazina made inappropriate sexual comments toward Plaintiff. Plaintiff reported those sexual comments to Lyle Weisman. Weisman indicated he would talk with Brazina.

24. Following Plaintiff's complaint, Brazina became aggressive toward Plaintiff.

25. Plaintiff complained to Weisman of Brazina's aggressive behavior in retaliation for her complaint.

26. In response, Weisman told Plaintiff to "cut him a break."

27. Weisman took no effective remedial action.

28. Weisman yelled at Plaintiff Carmichael on multiple occasions during her employment with Defendant.

29. Weisman often yelled at Defendant's female employees.

30. On one occasion, Weisman berated Plaintiff Carmichael for mistakenly taking the wrong form of payment from a tenant. While driving with Plaintiff to multiple banks to rectify the payment issue, Weisman was aggressive and intimidating toward Plaintiff.

31. Weisman interrogated Plaintiff, suggested she had a personal relationship with the tenant, and questioned Plaintiff's integrity. Weisman repeatedly asked Plaintiff Carmichael if she wanted to keep her job.

32. Weisman held female employees to unfair work standards compared to the male employees.

33. Defendant put female employees in dangerous situations.

34. On one occasion, Weisman instructed Plaintiff Carmichael to climb through an unlocked window of an eviction unit without knowing whether someone was present in the home.

35. On one occasion, Weisman instructed Plaintiff Carmichael and Rebecca Themelis, another female employee, to go to a male tenant's apartment late at night, after the tenant yelled at them over the phone. When they refused, Weisman drove and picked up Themelis, then took her to the tenant's apartment, screaming at her and driving erratically.

36. On or about April 14, 2024, a female employment applicant of Defendant refused to join the company as an employee because of Malka's inappropriate advances.

37. On or about April 17, 2024, Plaintiff Carmichael reported sexual harassment by Malka, and her discomfort working with him, to Weisman.

38. In response, Weisman dismissed Plaintiff Carmichael's and the applicant's allegations and concerns.

39. Defendant took no appropriate remedial action in response to Plaintiff or anyone else's complaints of sexual harassment.

40. On or about May 2, 2024, Respondents terminated another female employee, who had also opposed Yossi's sexual harassment.

41. On or about May 30, 2024, Plaintiff Carmichael again reported her discomfort with Malka's inappropriate sexual behavior.

42. Weisman denied Malka's misconduct.

43. Shortly thereafter, Weisman instructed Plaintiff Carmichael to turn in her work equipment and clock out.

44. On or about May 30, 2024, Defendant terminated Plaintiff Carmichael's employment.

45. Defendant did not give any reason for Plaintiff Carmichael's termination.

46. Weisman later falsely claimed that Plaintiff Carmichael quit her employment.

47. Defendant terminated one or more other female employees who reported Malka's inappropriate behavior.

48. On information and belief, Defendant replaced Plaintiff Carmichael and another female employee who had reported sexual harassment with less qualified male employees who had not reported sexual harassment.

49. On information and belief, Defendant has a practice of paying men more than women, regardless of their qualifications.

50. On one occasion, Plaintiff asked Weisman for a raise. In response, Weisman told Plaintiff that women cannot make more money than men.

51. Plaintiff Carmichael feared for her safety when she lived in Defendant's apartment complex, because Weisman and Malka had keys to her living space. As a result, Plaintiff sometimes slept on the couch in another employee's home and/or in other apartments to avoid being alone in her own apartment.

52. As a result of Defendant's actions, Plaintiff has suffered lost compensation and benefits of employment, emotional distress and mental anguish, and attorneys' fees from Defendant's actions.

VIOLATIONS OF LAW

COUNT I

SEX DISCRIMINATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

53. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

54. Weisman yelled at Plaintiff Carmichael on multiple occasions during her employment.

55. Weisman often yelled at female employees.

56. Defendant sometimes put Plaintiff and other female employees in dangerous situations.

57. Defendant had a practice of paying male employees more than female employees, regardless of their qualifications.

58. Plaintiff's sex was a motivating factor in Defendant's decision to terminate Plaintiff's employment, and such act constituted discrimination against Plaintiff in violation of Mo. Rev. Stat. § 213.055.

59. As a result of Defendant's illegal conduct and actions, Plaintiff has suffered lost wages and benefits of employment.

60. As a result of Defendant's illegal conduct and actions, Plaintiff has suffered emotional distress.

61. As a result of Defendant's illegal conduct and actions, Plaintiff has incurred attorneys' fees and costs of litigation and will continue to incur such fees and costs

62. Defendant's conduct was outrageous because of Defendant's evil motive or reckless indifference to Plaintiff's rights not to be discriminated against based on sex, and is conduct for which punitive damages are warranted

WHEREFORE, Plaintiff prays that this Court, after trial by jury, enter judgment for Plaintiff and against Defendant, in an amount to exceed \$25,000, for Plaintiff's past and future lost wages and benefits of employment, and pre-judgment interest thereupon, for emotional distress damages, for punitive damages, for attorneys' fees and costs of litigation, and for such other relief this court deems just and proper.

COUNT II

SEXUAL HARASSMENT IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

63. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

64. Defendant's manager Malka made inappropriate advances on Plaintiff when he asked her out for drinks and pressured her to accept his invitation.

65. Defendant's manager Malka made inappropriate sexual advances to other female employees and female employment applicants.

66. Defendant knew or should have known of Malka's inappropriate treatment of Plaintiff and other female employees.

67. Defendant took no effective remedial action to stop Malka from harassing Plaintiff, other female employees and employment applicants.

68. Weisman yelled at Plaintiff Carmichael on multiple occasions during her employment.

69. Weisman often yelled at female employees.

70. Defendant sometimes put Plaintiff and other female employees in dangerous situations.

71. Defendant's treatment of Plaintiff and other female employees the terms and conditions of employment of Plaintiff's employment and created a hostile work environment based on sex (female) in violation of Mo. Rev. Stat. § 213.055.

72. As a result of Defendant's illegal conduct and actions, Plaintiff has suffered lost wages and benefits of employment.

73. As a result of Defendant's illegal conduct and actions, Plaintiff has suffered emotional distress.

74. As a result of Defendant's illegal conduct and actions, Plaintiff has incurred attorneys' fees and costs of litigation, and will continue to incur such fees and costs

75. Defendant's conduct was outrageous because of Defendant's evil motive or reckless indifference to Plaintiff's rights not to be discriminated against based on sex, and is conduct for which punitive damages are warranted

WHEREFORE, Plaintiff prays that this Court, after trial by jury, enter judgment for Plaintiff and against Defendant, in an amount to exceed \$25,000, for Plaintiff's past and future lost wages and benefits of employment, and pre-judgment interest thereupon, for emotional distress damages, for punitive damages, for attorneys' fees and costs of litigation, and for such other relief this court deems just and proper.

COUNT III

RETALIATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

76. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

77. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if fully set forth herein.

78. Plaintiff reported sexual harassment of female employees and applicants by Defendant's manager to Weisman, who is Defendant's owner and Plaintiff's supervisor.

79. Plaintiff opposed the sexual harassment by Defendant's manager and communicated that opposition to Weisman.

80. Plaintiff's report of and opposition to the sexual harassment constituted protected activity under the MHRA.

81. Plaintiff's protected activity was a motivating factor in Defendant's decision to terminate Plaintiff's employment.

82. Defendant's actions constituted retaliation against Plaintiff in violation of Mo. Rev. Stat. § 213.070.

83. As a result of Defendant's illegal conduct and actions, Plaintiff has suffered lost wages and benefits of employment.

84. As a result of Defendant's illegal conduct and actions, Plaintiff has suffered emotional distress.

85. As a result of Defendant's illegal conduct and actions, Plaintiff has incurred attorneys' fees and costs of litigation and will continue to incur such fees and costs.

86. Defendant's conduct was outrageous because of Defendant's evil motive or reckless indifference to Plaintiff's rights not to be discriminated against based on sex, and is conduct for which punitive damages are warranted.

WHEREFORE, Plaintiff prays that this Court, after trial by jury, enter judgment for Plaintiff and against Defendant, in an amount to exceed \$25,000, for Plaintiff's past and future lost wages and benefits of employment, and pre-judgment interest thereupon, for emotional distress damages, for punitive damages, for attorneys' fees and costs of litigation, and for such other relief this court deems just and proper.

JURY DEMAND

PLAINTIFF REQUESTS A TRIAL BY JURY ON ALL ISSUES TRIABLE BY JURY.

Respectfully Submitted:

KENNEDY HUNT, P.C.

By: /s/ Nicole A. Matlock
Nicole A. Matlock, #66894
Meredith S. Berwick, #64389
Kennedy Hunt, P.C.
4500 West Pine Blvd.
St. Louis, MO 63108
(314) 872-9041
(314) 872-9043 fax
nmatlock@kennedyhuntlaw.com
meredith@kennedyhuntlaw.com