

IN THE CIRCUIT COURT OF BOONE COUNTY  
THIRTEENTH JUDICIAL CIRCUIT  
STATE OF MISSOURI

MELITA WALKER, ED.D., )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 COLUMBIA PUBLIC SCHOOL )  
 DISTRICT, )  
 )  
 Serve: )  
 Dr. Brian Yearwood, Superintendent )  
 1818 W. Worley Street )  
 Columbia, MO 65203 )  
 )  
 Defendant. )

Case. No.:

**JURY TRIAL DEMANDED**

**PETITION FOR DAMAGES**

COMES NOW Melita Walker, Ed.D., by and through her attorneys, and for her Petition for Damages against Defendant Columbia Public School District alleging violations of the Missouri Human Rights Act, § 213.010 R.S.Mo., *et seq.* (MHRA), states as follows:

**GENERAL ALLEGATIONS**

1. Plaintiff Melita Walker, Ed.D., is an African American female citizen of the state of Missouri and currently resides in Boone County, Missouri.
2. Defendant Columbia Public School District (CPSD) is a public school district and political subdivision organized and existing under the laws of the State of Missouri, with its principal office located at 1818 West Worley Street, Columbia, MO 65203.
3. Defendant CPSD has the capacity to sue and be sued and is located in Boone County, Missouri.
4. Venue in this Court is proper because the allegations that gave rise to this action occurred in Boone County, Missouri.

5. On or about January 22, 2025, Plaintiff filed a charge against Defendant with the Missouri Commission on Human Rights (MCHR), alleging race discrimination and retaliation. The MCHR docketed Plaintiff's charge as Charge No. FE-01/25-39935.

6. On or about January 28, 2026, the MCHR issued Plaintiff a Notice of Right to Sue for Charge No. FE-01/25-39935. A copy of that Notice of Right to Sue is attached hereto as Exhibit 1.

7. This action is filed within ninety (90) days of that Notice and within two (2) years of the last act of discrimination.

8. Plaintiff has complied with the administrative exhaustion requirements of the MHRA as stated in § 213.075 R.S.Mo.

**FACTUAL ALLEGATIONS**

9. In or about 2014, Defendant CPSD hired Plaintiff as the Assistant Principal at Battle High School.

10. In about 2017, Defendant CPSD promoted Plaintiff to Principal of West Middle School, a position she held until the termination of her employment in June 2025.

11. As Principal, Plaintiff reported to Defendant's Director of Secondary Education, Dr. Adam Taylor (a Caucasian male).

12. At all times relevant herein, Plaintiff performed her job duties and responsibilities in a satisfactory manner.

13. Prior to each school year, Defendant CPSD provided Plaintiff with an administrative contract appointing her to her position for the upcoming school year.

14. In about 2018, Plaintiff filed a lawsuit against Defendant CPSD alleging that Defendant failed to promote her to a high school principal position because of race discrimination.

15. Plaintiff's 2018 lawsuit constituted protected activity.

16. In about July 2020, while Plaintiff's lawsuit was still pending, Dr. Brian Yearwood (an African American male) became Defendant's Superintendent.

17. As Superintendent, Yearwood requested a list of individuals who had sued Defendant CPSD.

18. On one or more occasions, Yearwood stated that he wanted to "get rid of" those individuals who had sued Defendant CPSD.

19. Between 2021 and 2024, Defendant's senior administrators repeatedly harassed and targeted Plaintiff because of her race and her prior protected activity. This conduct included, but was not limited to, the following actions:

- a. In or about early 2024, Taylor told Plaintiff that the tone of an email she sent to a parent was that of an "angry Black woman."
- b. In or about early 2024, Director Data Dave Wilson stated that Plaintiff was considered "an angry Black woman."
- c. In or about 2024, Wilson told Plaintiff that others in the district thought she was angry.
- d. In or about 2023 or 2024, Board president Suzette Waters made a statement to the effect that Plaintiff was "angry" and took too much time defending herself.
- e. In or about August 2023, Taylor accused Plaintiff of being unprofessional and berating a colleague.
- f. In or about early 2022, Yearwood described Plaintiff as "disrespectful," "unprofessional," and/or "hostile" during a Zoom call with colleagues.

20. Between 2021 and 2024, Defendant CPSD made baseless accusations of policy violations against Plaintiff.

21. In or about 2024, Defendant CPSD attempted to give Plaintiff a policy violation for failing to go through proper protocol for her school's purchase of a photo booth. When Plaintiff indicated she had followed the proper protocols, the policy violation was not issued.

22. Defendant CPSD did not treat similarly situated non-Black employees and/or employees who had not engaged in protected activity in this manner.

23. In or about October 2023, Plaintiff filed a grievance complaining of discriminatory and retaliatory harassment.

24. Plaintiff's grievance constituted protected activity.

25. In about Spring 2024, Plaintiff began planning West Middle School's annual Back-to-School Bash ("the Bash"), a community engagement event that she had organized and led for approximately eight years.

26. The Bash brought together approximately 75 community organizations and businesses and served approximately 1,500 attendees by providing school supplies, clothing, haircuts, and other essential resources for the upcoming school year.

27. The Bash was traditionally held on the Friday afternoon immediately before students returned to school.

28. By March 2024, Plaintiff had scheduled the Bash for Friday, August 16, 2024, reserved the venue, notified partner organizations, and informed Defendant of the date.

29. Plaintiff's attendance at the Bash was essential, as she served as the primary organizer and coordinator and was responsible for overseeing all event operations.

30. Defendant annually hosts a back-to-school convocation (“Convocation”), a districtwide event consisting primarily of speeches. The Convocation does not include professional development, and Principals are not assigned substantive duties beyond participation. Defendant designates attendance of the Convocation as mandatory.

31. Historically, the Convocation was held in the morning on the first day teachers returned from summer break, approximately one week before students returned. In 2024, that date would have been August 13, 2024, and therefore did not conflict with the Bash when Plaintiff scheduled the event.

32. On or about May 26, 2024, Plaintiff learned that Yearwood rescheduled the Convocation to occur at the same date and time as the Bash.

33. Before 2024, the Convocation had never been held on a Friday afternoon.

34. When she learned the Convocation would conflict with the Bash, Plaintiff immediately notified Taylor (her supervisor) and Defendant Chief Schools Officer, Dr. Helen Porter, (a Caucasian female), of the conflict. Both were aware that Plaintiff’s attendance at the Bash was essential and did not inform Plaintiff at that time that she would be required to attend the Convocation instead.

35. On or about August 6, 2024, Plaintiff e-mailed an invitation for the Bash to West Middle School families.

36. On about August 7, 2024, Taylor informed Plaintiff for the first time that she would be disciplined if she did not attend the Convocation.

37. Plaintiff reminded Taylor that she had previously disclosed the conflict.

38. Plaintiff formally requested leave to attend the Bash.

39. Defendant instructed district employees to request time off through the TalentEd system to take time off on the day of the Convocation. Defendant's Human Resources (HR) department indicated that only they would approve time off for that day.

40. Plaintiff followed the protocol and HR directives and requested PTO through the TalentEd system.

41. Defendant refused to process Plaintiff's request for time off so she could attend the Bash.

42. On or about August 16, 2024, Plaintiff attended the Bash rather than the Convocation. That morning, Plaintiff again explained to Taylor that her presence at the Bash was necessary, particularly because no other staff would be available to attend due to the Convocation. Taylor nevertheless reiterated that Plaintiff would be disciplined.

43. On or about August 23, 2024, Defendant suspended Plaintiff and placed her on administrative leave, pending investigation.

44. Defendant claimed Plaintiff violated District policy by failing to attend the Convocation and engaged in other misconduct. These stated reasons were pretextual.

45. Other employees who were non-Black and/or had not engaged in protected activity also failed to attend the Convocation but were not suspended or disciplined.

46. On or about September 16, 2024, Plaintiff met with Chief HR Officer Michelle Holz (a non-Black female) and Assistant HR Director Josh Johnson (a non-Black male) regarding Defendant's investigation.

47. During that meeting, Plaintiff complained that her administrative leave was discriminatory and retaliatory.

48. On or about October 16, 2024, Plaintiff filed a grievance, in which she reiterated her complaint of retaliation and discrimination.

49. Plaintiff's 2024 grievance constituted protected activity.

50. On or about November 12, 2024, Defendant informed Plaintiff that she would not be permitted to return to work and that her contract as Principal of West Middle School would not be renewed.

51. Plaintiff remained on administrative leave for the remainder of the 2024–2025 school year.

52. On or about June 30, 2025, Defendant terminated Plaintiff's employment.

### **COUNT I**

#### **RACE 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. Plaintiff is an African American female citizen.

55. At all times relevant herein, Defendant Columbia Public Schools was an “employer” within the meaning of the MHRA, § 213.010(8) R.S.Mo.

56. Between 2021 and 2024, Defendant's senior administrators made multiple comments related to Plaintiff's race, including the following:

- a. In or about early 2024, Taylor told Plaintiff that the tone of an email she sent to a parent was that of an “angry Black woman;”
- b. In or about early 2024, Director Data Dave Wilson stated that Plaintiff was considered “an angry Black woman;”

- c. In or about 2024, Wilson told Plaintiff that others in the district thought she was angry;
- d. In or about 2023 or 2024, Board president Suzette Waters made a statement to the effect that Plaintiff was “angry” and took too much time defending herself;
- e. In or about August 2023, Taylor accused Plaintiff of being unprofessional and berating a colleague; and
- f. In or about early 2022, Yearwood described Plaintiff as “disrespectful,” “unprofessional,” and/or “hostile” during a Zoom call with colleagues.

57. As described above, Defendant treated Plaintiff differently from similarly situated non-Black employees, including disciplining Plaintiff for conduct for which non-Black employees were not disciplined.

58. During Plaintiff’s employment, Defendant subjected Plaintiff to adverse employment actions, including but not limited to suspension, placement on administrative leave, and the non-renewal/termination of her employment.

59. Plaintiff’s race was a motivating factor in Defendant’s decision take negative employment actions against her.

60. Defendant’s conduct constitutes race discrimination in violation of § 213.055 of the MHRA.

61. As a result of Defendant’s actions, Plaintiff suffered damages, including but not limited to lost wages and benefits of employment.

62. As a result of Defendant’s actions, Plaintiff has suffered emotional distress and mental anguish.

63. 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.

64. The misconduct described in this Count was undertaken with malice, willfulness, and reckless indifference to the rights of others.

**WHEREFORE**, Plaintiff prays that after trial by jury, this Court finds for Plaintiff and against Defendant on Plaintiff's claim of race discrimination and awards Plaintiff lost wages and benefits of employment, front pay, emotional distress damages, punitive damages, pre- and post-judgment interest, attorneys' fees, costs of litigation, and such other relief that this Court deems just and proper.

**COUNT II**

**RETALIATION**  
**IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT**

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

66. During her employment, Plaintiff made one or more complaints of race discrimination and harassment.

67. Plaintiff's complaints of discrimination and harassment constituted protected activity.

68. During Plaintiff's employment, Defendant subjected Plaintiff to adverse employment actions, including but not limited to suspension, placement on administrative leave, and the non-renewal/termination of her employment.

69. Plaintiff's protected activity was a motivating factor in Defendant's decision take negative employment actions against her.

70. Defendant's conduct constitutes retaliation in violation of § 213.070 of the MHRA.

71. As a result of Defendant's actions, Plaintiff suffered damages, including but not limited to lost wages and benefits of employment.

72. As a result of Defendant's actions, Plaintiff has suffered emotional distress and mental anguish.

73. 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.

74. The misconduct described in this Court was undertaken with malice, willfulness, and reckless indifference to the rights of others.

**WHEREFORE**, Plaintiff prays that after trial by jury, this Court finds for Plaintiff and against Defendant on Plaintiff's claim of retaliation and awards Plaintiff lost wages and benefits of employment, front pay, emotional distress damages, punitive damages, pre- and post-judgment interest, attorneys' fees, costs of litigation, and such other relief that this Court deems just and proper.

Respectfully submitted,

**KENNEDY HUNT, P.C.**

By: /s/ Nicole A. Matlock  
Nicole Matlock, MO Bar #66894  
Hayley Leach-Stratton, MO Bar #78064  
Kennedy Hunt, P.C.  
4500 West Pine Blvd.  
St. Louis, MO 63108  
(314) 872-9041  
(314) 872-9043 fax  
[nmatlock@kennedyhuntlaw.com](mailto:nmatlock@kennedyhuntlaw.com)  
[hayley@kennedyhuntlaw.com](mailto:hayley@kennedyhuntlaw.com)