

AMENDED CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA**410-2025-07023**☒ EEOC

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Stacie Powers

Home Phone (Incl. Area Code)

(470) 886-2115

Date of Birth

09/08/1976

Street Address

737 Greenvale Road Apt. 833

City, State and ZIP Code

Lawrenceville, Georgia 30043

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

Class-Act Security Protection & Training Academy Inc.

No. Employees, Members

15+

Phone No. (Include Area Code)

(770) 797-5321

Street Address

3370 Sugarloaf Parkway

City, State and ZIP Code

Lawrenceville, Georgia 30044

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ GENETIC INFORMATION
☒ OTHER (Specify) **Harassment (sex)**

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

12/2023**03/28/2025**☐

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I. My name is Stacie Powers. I was employed by Respondent Class-Act Security Protection & Training Academy Inc. ("Respondent") from on or about August 27, 2023 until March 28, 2025. Beginning in approximately December 2023, Respondent's Chief Financial Officer, Chief Eddie Cousin, began subjecting me to severe and pervasive sexual harassment. Respondent's Owner, Chief Wanda Turner, who is Chief Cousin's girlfriend, also subjected me to sexual harassment. When I began opposing the sexual harassment, Respondent retaliated against me, including by, among several things, accusing me of theft and terminating my employment. Respondent has violated Title VII of the Civil Rights Act of 1964 ("Title VII") by subjecting me to a hostile work environment based on my sex, quid pro quo sexual harassment, and retaliating against me for engaging in protected activity.

II. I was employed by Respondent from on or about August 27, 2023 until March 28, 2025. I started working for Respondent as a Human Resources Administrator. I reported to Respondent's Owner, Chief Wanda Turner. Respondent's business operations consisted of two primary areas: administrative and operations. Throughout my employment with Respondent, I held positions in both areas. I worked as an HR Administrator, HR Manager, HR Director, Office Manager, Accounts Payable and Accounts Receivable, and Dispatcher. I additionally held the positions of Officer, Lieutenant, and Captain. I consistently ranked among Respondent's highest performers. Additional duties I performed while employed included making check deliveries, visiting client sites with officers, and taking meetings, calls, and working dispatch duties on weekends and after hours.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

Jun 27, 2025

Date


 Stacie Powers (Jun 27, 2025 18:50 EDT)

Charging Party Signature

AMENDED CHARGE OF DISCRIMINATION

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☐ FEPA
☒ EEOC

410-2025-07023

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- III. Chief Turner and Respondent's Chief Financial Officer, Chief Eddie Cousin, were engaged in a romantic relationship. On or about December 14, 2023, Respondent promoted me from an HR Administrator to HR Manager. That same day, Chief Cousin began making sexual advances towards me. Specifically, Chief Cousin (1) began telling me that I was beautiful, (2) stated that I had a "nice rack," and (3) claimed that I was "his." I was uncomfortable by his sexual advances. Chief Cousin stated to me "if you don't want to be my friend, I will tell her [Chief Turner] to fire you," or words to that effect.
- IV. The following week, in approximately December 2023, I learned that my then-assistant, Epiphany Wade, reported to Chief Turner that she was being sexually harassed by Chief Cousin. Instead of investigating those claims, Chief Turner fired Ms. Wade.
- V. The sexually harassing comments and behavior continued from approximately December 2023 until April 2024. During this time period, on several occasions, Chief Cousin called me while I was in the office and informed me that he was watching me on the cameras in the office.
- VI. On or about April 22, 2024, following Chief Cousin's birthday dinner, where several other employees were in attendance, Chief Cousin asked me to come back to his house, stating that he wanted me to "do more work." I declined.
- VII. In approximately early May 2024, Chief Cousin instructed me to drop off work uniforms and pick up an officer's jacket from his house. Chief Cousin told me that Chief Turner could not know that I had his home address. Upon my arrival, Chief Cousin wanted me to tour his house and told me that my job was "safe with him" but stated that he wanted to see my "loyalty to him," or words to that effect. Chief Cousin then stated that there was "something that he liked" and that he "needed me to do the thing he liked" suggesting I perform oral sex.
- VIII. I felt I had no choice but to engage in sexual activities with Chief Cousin to keep my job. Following this, Chief Cousin began frequently calling and texting me and regularly requesting to see me. The vast majority of my job duties began orbiting around Chief Cousin's needs and I was unable to perform my regular job duties.
- IX. In approximately June 2024, Chief Cousin instructed me and Director, Shawn Owens to dispatch him to Atlanta as much as possible for jobs. This was a change in our standard procedure, as Chief Cousin was typically only dispatched during significant, high-level situations because he lived approximately two hours away, in Bartow, Georgia.
- X. Because we were instructed to dispatch Chief Cousin to Atlanta more frequently, whenever he was in the city, he requested to see me. I was not allowed to decline his requests. Specifically, when Chief Cousin's was dispatched to Atlanta, he instructed me to meet him in a Goodwill parking lot in Stone Mountain, Georgia. He then required that I leave my car in the parking lot and transported me to his nearby Stone Mountain home. This soon became a regular occurrence, with Chief Cousin's luring me with work-related requests or tasks before engaging in sexual acts and requiring that I stay at his home on the weekends. This continued for approximately one year.
- XI. Because I feared retaliation, and witnessed Respondent terminate employees who complained about Chief Cousin's sexually harassing behavior in the past, including Ms. Wade and Chief Turner's sister who was employed as a Sergeant, I felt I had no choice but to comply. Chief Cousin soon became controlling and did not want me to interact with any other men or have any male friends.
- XII. On or about March 2, 2025, Respondent promoted me from Lieutenant to Captain.
- XIII. On that same day, Chief Cousin sent me a text message saying he loved and adored me and that I was "the one" for him. On or about March 6, 2025, Chief Turner saw the text message Chief Cousin sent to me and instructed me to "stand down" from my job duties at the Goodwill location where I was working.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Jun 27, 2025

Date


Eddie Powers (Jun 27, 2025 18:50 EDT)

Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

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FEPA

410-2025-07023

EEOC

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- XIV. Later on that same day, I called Chief Turner several times to inform her of my intent to resign, but she did not answer. I then called Chief Cousin to inform him of the same and he told me that I could not resign.
- XV. On or about March 9, 2025, Chief Turner informed me that she wanted to make a relationship between me, herself, and Chief Cousin "work." She stated that I needed to do whatever Chief Cousin wanted and further informed me that she was willing to do whatever to make him happy. Chief Turner then proposed that the three of us engage in a "threesome" because that was what Chief Cousin wanted. However, I informed Chief Turner that I refused to participate in the relationship.
- XVI. Chief Turner then told me that if I didn't want to be in a relationship with them, then Respondent was terminating my employment. When I opposed the retaliatory termination, Chief Turner stated, "I'm the owner and I can do whatever I want," or words to that effect.
- XVII. I asked Chief Turner for some time to think about her proposal. I did not intend to participate in the relationship but hoped this would allow me time to find new employment.
- XVIII. On that same day, Chief Turner called me and accused me of stealing a check from the office and told me that she was terminating my employment. I informed Chief Turner that I had not stolen the check and suggested she check the office's mailbox, where she in fact found the check.
- XIX. When I arrived at the office on or about March 10, 2025, Chief Turner had destroyed the area where I worked, including tearing down items from the walls, and trashing the personal items on my desk.
- XX. Over the course of the next few days, Chief Turner persistently called me, inquiring about my decision.
- XXI. On or about March 20, 2025, Chief Turner sent her son, Brandon Turner, who himself had been terminated in approximately November 2024 for alleged sexual misconduct, to the office. Brandon Turner had no legitimate reason to be in the office, however I believe Chief Turner sent him to the office to intimidate me.
- XXII. On or about March 28, 2025, I informed Chief Turner that I did not intend to participate in the threesome. Chief Turner then terminated my employment and called the police, falsely reporting that I stole money from the company. When the police arrived, Chief Turner recorded the arrest while laughing. I spent the weekend in jail and all charges against me were eventually dropped.
- XXIII. Respondent has violated Title VII of the Civil Rights Act of 1964 ("Title VII") by subjecting me to a hostile work environment based on my sex, quid pro quo sexual harassment, and retaliating against me for engaging in protected activity.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Jun 27, 2025

Date


Charlie Powers (Jun 27, 2025 18:50 EDT)

Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

- 1. FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
- 2. AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
- 3. PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
- 4. ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
- 5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.