UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:26-cv-01290

APRIL ELAINE TAYLOR, Plaintiff, v. JOHN MICHAEL CAUSEY, individually and in his official capacity as North Carolina Commissioner of Insurance; the STATE OF NORTH CAROLINA; and THE NORTH CAROLINA DEPARTMENT OF INSURANCE, Defendants.	)	**COMPLAINT** **(Jury Trial Demanded)**

Plaintiff April Elaine Taylor ("Plaintiff" or "Mrs. Taylor"), by and through undersigned counsel, complaining of Defendants, alleges as follows:

NATURE OF THE ACTION

1. This action concerns the destruction of a public servant's career by some of the very officials and institutions charged with protecting the integrity of North Carolina government.

2. April Elaine Taylor devoted approximately eighteen years of her life to serving the State of North Carolina. With only a limited number of years remaining before the retirement she had spent nearly two decades earning, she did not voluntarily abandon her career. She was driven from it.

3. Commissioner John Michael Causey recruited Mrs. Taylor to employment at the North Carolina Department of Insurance to a position that he created, against the backdrop of a longstanding friendship with her family. At the time, Mrs. Taylor regarded Causey as family. He was one of her uncle's best friends. In fact, before he was elected in 2016, she had even encouraged him to make another run at the office of Insurance Commissioner, knowing that he had run for

office multiple times in the past. When Causey threw his hat into the ring in what would eventually become his successful 2016 bid, he had just wrapped up a campaign for Congress in North Carolina's Sixth Congressional district.

4. As far as Mrs. Taylor knew, here was an impressive person who appeared to share her personal and political values, and who had genuine prior experience running for office. Then, before either of them knew it, Causey found himself being sworn in as North Carolina's Insurance Commissioner, with the power to influence the lives of over 500 departmental employees. During his first year in office, Mr. Causey set about recruiting Mrs. Taylor in earnest, knowing that she was deeply unhappy with her underpaid and high-risk employment as a probation officer.

5. Towards the end of 2017, Causey's promises of higher pay and being able to "write [her] own job description" paid off, and Taylor came to work for NCDOI in a position that was created as the result of his expansion of the department's satellite offices and operations. Causey knew that she trusted him, knew that her status as one of his hires left her employment unusually dependent upon his favor, and repeatedly encouraged her to bring workplace concerns directly to him.

6. When Mrs. Taylor did so, she did not receive the protection that an employee should be able to expect from the head of a State agency. Instead, Causey exploited the family relationship and the power inherent in his office to subject her to persistent, sexualized communications and advances. This inappropriate conduct culminated in an incident during government work hours and on government property, during which Causey entered her office, closed the door, hugged her, and kissed her on the mouth without her consent.

7. For an employee whose continued employment depended upon the whims of a Commissioner who made no secret about discussing with her the names of prior employees at the department whose employment he had terminated, the ordinary avenues of recourse did not reasonably appear independent or safe. Mrs. Taylor alleges that she feared that human resources

personnel, subordinate managers, and internal officials ultimately answered to the same elected official whose conduct she needed to report. When she nevertheless attempted to use internal channels to report other misconduct she observed in the Department's operations, she experienced isolation, hostility, diminished assignments, and retaliation. When she followed Causey's invitation to come directly to him about those departmental concerns, the man positioned as her avenue of recourse was himself the source of unwanted sexual advances, unwanted physical contact, and apparent betrayals of her confidence to the exact supervisors who were already mistreating her.

8. At the same time, NCDOI possessed medical documentation concerning Mrs. Taylor's disabilities and the workplace barriers they created. Yet NCDOI delayed beginning a meaningful interactive process, failed to furnish timely effective accommodations, and did not issue its written determination on her request for reasonable accommodations until February 25, 2026, only days before her March 4, 2026 resignation. Some equipment that was approved to be purchased for her was not even required to be ordered until after the inappropriate treatment of Mrs. Taylor had finally reached a breaking point.

9. This was not mere dissatisfaction, criticism, or an unpleasant working relationship. Mrs. Taylor alleges a closed-door sexual battery by the elected head of her agency; years of sexualized conduct by the person who controlled her appointed position; retaliation and isolation when she reported wrongdoing; an absence of any reasonably safe internal avenue around the alleged harasser; conduct by her coworkers and superiors that actively exacerbated her medically-documented disabilities, and an employer's prolonged failure to remove documented disability-related barriers. Taken together, these conditions became objectively intolerable. A reasonable person in Mrs. Taylor's position would have felt compelled to resign, and Mrs. Taylor did resign.

10. The consequences of the mistreatment and abuse she endured have been devastating. Mrs. Taylor suffered severe emotional distress and aggravation of existing

psychological conditions. She lost wages, benefits, service credit, pension value, and retirement security that she would have earned by continuing State service, and the opportunity to complete the final years of a career she had spent almost two decades building. The abrupt and public end of that career has damaged her professional standing and materially impaired her prospects for comparable reemployment.

JURISDICTION AND VENUE

11. This Court has federal-question jurisdiction under 28 U.S.C. § 1331 over claims arising under Title VII, 42 U.S.C. § 2000e et seq., 42 U.S.C. § 1983, and the ADA, 42 U.S.C. § 12101 et seq. Title VII prohibits discrimination concerning compensation, terms, conditions, or privileges of employment because of sex. 42 U.S.C. § 2000e-2(a). The ADA uses Title VII's powers, remedies, and procedures for employment-discrimination enforcement. 42 U.S.C. § 12117(a).

12. This Court has supplemental jurisdiction under 28 U.S.C. § 1367 over the related North Carolina Constitutional, tort, and whistleblower claims. Plaintiff pleads the whistleblower claim under the North Carolina law in force when the relevant reports and retaliation occurred, including former N.C. Gen. Stat. §§ 126-84 through 126-88, and under any recodified successor provisions applicable to the claim, including Article 14 of Chapter 126A, without conceding retroactive application of provisions enacted after the challenged conduct.

13. Venue is proper in this District because a substantial part of the events occurred here, including events at NCDOI's Archdale office.

14. Plaintiff exhausted the federal administrative prerequisites through EEOC Charge No. 435-2026-00946. The EEOC issued a Determination and Notice of Rights on August 4, 2026.

PARTIES

15. Plaintiff April Elaine Taylor is a citizen and resident of North Carolina. She had approximately eighteen years of State service and worked for NCDOI from 2017 until March 4,

2026. She was capable of performing the essential functions of her position, had a lengthy record of State service, and could have continued performing her work with timely reasonable accommodations.

16. Defendant the State of North Carolina is a state in the Southeast region of the contiguous United States with its Capitol situated in the City of Raleigh, and its current Constitution having been ratified in 1971. At all times relevant hereto, Plaintiff was an employee of the State of North Carolina via the North Carolina Department of Insurance.

17. Defendant North Carolina Department of Insurance (hereinafter "NCDOI") is an executive-branch department of the State of North Carolina and was Plaintiff's employer within the meaning of the federal statutes alleged.

18. Defendant John Michael Causey is a citizen and resident of North Carolina and is the elected North Carolina Commissioner of Insurance and head of the North Carolina Department of Insurance.

FACTUAL ALLEGATIONS

19. Before becoming Commissioner, Causey had a longstanding relationship with Mrs. Taylor's family, including her great-uncle, who enthusiastically supported Causey. That relationship gave Causey personal credibility and access that predated the employment relationship.

20. After his 2016 election, Causey hired Mrs. Taylor into a regional-director position. Her compensation increased and she became dependent upon the confidence and favor of the elected official who had appointed her.

21. Mrs. Taylor understood that, unlike a conventional career employee protected by ordinary civil-service structures, her job, and by extension her livelihood, could more easily be

terminated by Causey. She reasonably believed that this status sharply limited the safety and practical independence of traditional reporting channels.

22. Causey repeatedly invited and encouraged Mrs. Taylor to bring workplace concerns directly to him. Yet the route he offered did not lead around the problem. It led directly to the official whose own conduct became a central source of fear and humiliation.

23. The parties' communications reflected the family connection. Causey often relayed to Mrs. Taylor when he would spend time Mrs. Taylor's Uncle Edward in communications with her, to which she would respond warmly with anecdotes like, "You are family!" Causey knew or reasonably should have known that she considered him in a familial regard, and trusted him both as a friend and eventually as a confidant, at Causey's own invitation.

24. Causey exploited that trust and the power imbalance inherent in their respective professional situations. By at least April 2018, he was sending Mrs. Taylor overtly sexualized messages, including, "I might jump your bones. Watch out!!!" Other messages included, "You're hotter than you realize," and "Just don't let me catch you in the room alone." Screenshots of these latter two messages are attached hereto as **Exhibit 1.**

25. Mrs. Taylor did not welcome Causey's sexual attention. Not knowing how to respond to this person who she understood to be her boss, and who she believed to have the power and influence inherent in the office of a statewide elected official, she figured her best chance at not losing her employment was to play along and hope that he would change the subject. Her responses included feigned laughter, emojis, cordiality, and occasional flattery, all in apparently futile efforts to placate and deflect a powerful appointing authority without provoking the sort of retaliation of which she knew first-hand that he was capable. Indeed, Causey would often convey thinly-veiled boasts about his power over others, including at least one instance in which he identified a powerful former employee of the department by name to Mrs. Taylor, and said "I've fired a lot of folks, friend and foe . . . [Employee's name] is no longer with us. He was my [fired

employee's position and job description]." Mrs. Taylor's replies to such inappropriate communications were not consent to sexual contact, they were attempts at self-defense and self-preservation by an unfortunate person caught in an extremely inappropriate situation not of her own making.

26. Just when Mrs. Taylor thought he had moved on from such comments, they would inevitably resurface. On one notable occasion when she let him know that she would be delayed in performing a work-related task that he requested of her because she had to pick up her cat from the vet, Causey responded with a text that read "Pet your kitty for me" with a winking-emoji. At other times he would regularly tell her things like, "sweet dreams/good morning beautiful," and "see you in dreamland." He would also continue with his inappropriate commentary to her regarding other staff and department personnel, including a comment at one point about how Black employees of the department were responding to the Covid-19 pandemic, stating "The black people in our building are the most scared . . . most but not all wear masks inside the building . . .." Screenshots of these messages are attached hereto collectively as **Exhibit 2.** On another occasion, Mrs. Taylor asked if she could send him what she believed to be strong evidence that her supervisor was deliberately not assigning work to her, to which Causey responded with apparent instructions on how to attempt to circumvent public records law, telling her to "scan and text" the document to his personal phone or to "give it to me in person," because "email can always be retrieved by the media."

27. Eventually, Causey's conduct moved from words to physical contact. He progressed in his conduct to the point at which he would often hug Mrs. Taylor tightly in ways that made her uncomfortable and sought physical affection from her.

28. On or about June 6, 2025, Causey came to Mrs. Taylor's office in the Archdale regional NCDOI office. Without warning, he entered her office, shut the door, and proceed to hug her tightly, and kiss her on the mouth without her consent.

29. The setting magnified the coercive force of the act. Causey was not a coworker of equal authority. He was the statewide elected Commissioner, head of her agency, the official connected to her appointment, and a person she had trusted because of his longstanding relationship with her family.

30. After the encounter, Mrs. Taylor was shaken and startled, to the point that she felt that she should attempt to document what had just occurred in writing. She texted him at approximately 12:41PM stating that "I thought I was in trouble when you started closing my door! [emoji] I probably had that deer caught in the headlights look". Causey responded that he "saw a good opportunity to grab a hug." Mrs. Taylor, feeling increasingly more uncomfortable with what had occurred, responded, "and a kiss! ["sunglasses" emoji]" to see if he would deny it. Rather than denying it, Causey answered, "Even better," "Lordy," appearing to affirm the nature of the encounter in writing. The contemporaneous exchange is consistent with Causey acknowledging the encounter rather than denying it.

31. When Mrs. Taylor's allegations against him became public, Causey denied initiating inappropriate physical contact and called the kissing allegation "totally false." He also said he did not recall sexualized messages concerning Mrs. Taylor's appearance. Mrs. Taylor alleges that those public denials cannot be reconciled with the preserved messages, a copy of which may be found attached hereto collectively as **Exhibit 3.**

32. On another occasion, on or about September 4, 2025, Causey initiated a text exchange with Mrs. Taylor by sending her a link to a WRAL article. In response, Mrs. Taylor sent him a video of her young grandson playing in her living room, exuding pride as every new grandparent does. Causey responded, stating "Congratulations Grannie!," to which Mrs. Taylor responded "I thought you knew! Not Grannie, Mimi [with a smiling emoji]. I'm a GILF! [with a series of "crying laughing" emojis], utilizing a slang descriptor involving women of a certain age and level of conventional desirability in a self-deprecating manner in light of her status as a

grandmother. It was at this point that Causey crossed the line of playful banter, responding in his next three messages with "Ok Mimi," "I'll take you up on that!," and "I had to look it up," in response to Mrs. Taylor attempting to brush off his inappropriate comment by saying "You are too much! [with numerous "crying laughing" emojis]. He then proceeded to send a text with what appeared to be a definition of an attempt that he made to look up the term "GILF," wherein he stated "terms GILF (for "granny I'd like to f*** [Causey did not censor the word])" and silver fox refer to attractive, highly-sexual older women (55+), regardless of child-bearing status." This message from Causey removed any ambiguity from his prior message of "I'll take you up on that!" appearing to confirm that Causey had just made an open proposition for sexual intercourse in response to what Mrs. Taylor had obviously meant as a light-hearted jest. Later in the same conversation, Causey sent an un-solicited, unannounced picture of his midsection as he sat in the passenger seat of his car, which appears to depict, or be an attempt to depict, the outline of his genitalia. A copy of this text thread is attached collectively hereto as **Exhibit 4.**

33. Since the public acknowledgement of Mrs. Taylor's allegations, public reporting identified another woman who accused Causey of entering her vehicle and kissing her on the lips without her consent. Plaintiff pleads that reported, unadjudicated allegation only as potentially relevant to notice, intent, absence of mistake, and whether the alleged conduct was isolated.

34. Mrs. Taylor also publicly reported what appeared to be violations of State law, rules, or regulations, misappropriation of State resources, gross mismanagement, and gross abuse of authority. Her reports included allegations that Causey campaigned on State time, used a State vehicle and State resources for personal or campaign purposes, and that NCDOI personnel disregarded legal requirements governing the licensing and license renewals of bail-bondsmen operating in North Carolina.

35. When Mrs. Taylor attempted to use departmental or other state government reporting channels, she was isolated, stripped of meaningful assignments or had assignments

altered, subjected to hostility, and treated in ways that would deter a reasonable State employee from reporting wrongdoing or discrimination.

36. Mrs. Taylor's diagnosed disabilities included misophonia, complex PTSD, generalized anxiety, ADHD and/or neurodivergence. When active, these conditions substantially limited major life activities including concentrating, thinking, learning, sleeping, interacting with others, and working.

37. NCDOI had actual notice of Mrs. Taylor's condition. As early as October 14, 2022, a provider documented intense distress caused by sound and requested a quiet workspace and permission to close her door. Later documentation explained that loud or group environments, music, radios, and other sounds increased anxiety and could trigger PTSD symptoms, and recommended a quiet environment and potentially remote work.

38. Mrs. Taylor was qualified for her position. Even Causey admitted this, saying "I was proud of her," and "I got good reports," when asked about her by News and Observer Reporter Dan Kane when he called the number at the other end of the text messages on Mrs. Taylor's phone to confirm that it was indeed Causey's phone, and Causey answered. A copy of this article is attached hereto as **Exhibit 5.** She possessed the experience and ability to perform her essential duties, had performed State work for approximately eighteen years, and could perform her position's essential functions with accommodations such as a quiet location, a closed office door, noise-reduction measures, visual notification devices, ergonomic support, and remote work where compatible with her duties.

39. Mrs. Taylor communicated both her disabilities and her desire for accommodation, supplied medical support identifying limitations and suggesting potential accommodations, responded to the process, and remained willing to discuss effective alternatives. Those communications triggered NCDOI's duty to engage in a bilateral, open, good-faith interactive

process. A copy of Mrs. Taylor's reasonable accommodation request form signed by her healthcare provider may be found attached hereto as **Exhibit 6.**

40. NCDOI, not Mrs. Taylor, caused or materially contributed to the breakdown and delay in resolving these issues. Mrs. Taylor alleges that approximately twenty-eight days elapsed before HR even began the interactive process of addressing her requests, despite the documented urgency and the availability of concrete accommodation options.

41. Only on February 25, 2026 did NCDOI issue a written determination approving noise-cancelling headphones, a visual call notifier, a visual doorbell, permission to close her door with signage, removal of an armrest, and lumbar support. The decision itself contemplated that physical items would be ordered no later than March 11, 2026.

42. By then the accommodation was largely theoretical. Mrs. Taylor resigned on March 4, 2026, before the deadline for ordering the equipment, as the conduct of her coworkers and her treatment by her supervisors had become too much to bear. Rather than promptly and reasonably addressing her concerns, she had been subjected in the weeks and months before her resignation to conduct from her coworkers that reasonably appeared by seek to exploit the physical and mental vulnerabilities that she had confidentially conveyed to her superiors at the department. Her coworkers, particularly the male coworkers, would leave department-owned radio receivers in proximity to her office set so that their chirping noises would intentionally exacerbate her misophonia. She would occasionally encounter odd or foreign smells in her office and on at least one occasion had a male colleague appear to jokingly ask her about said smell, appearing to reasonably affirm the notion that her coworkers were introducing foreign substances to her workspace in an attempt to cause her further distress. These examples, along with the totality of her mistreatment by her coworkers who upon information and belief had knowledge of her reasonable accommodation request, ultimately forced her to remove herself from her hostile

workplace environment. Her proposed remote-work accommodation had not been granted, while she alleges other employees were permitted remote flexibility.

43. Causey and NCDOI had notice of the conditions facing Mrs. Taylor: she repeatedly communicated workplace concerns to Causey, NCDOI possessed her medical documentation, she sought accommodations, she complained concerning retaliation and misconduct, and the agency's own delayed approval confirmed that multiple accommodations were feasible.

44. Nevertheless, the conditions continued. The person who allegedly sexually harassed and battered Mrs. Taylor remained the head of the employing agency. The internal channels she tried to use did not protect her. The channels Causey personally encouraged her to use exposed her to Causey himself. Disability-related barriers remained inadequately addressed until the eve of her departure.

45. These conditions were objectively intolerable, not merely unpleasant. A reasonable employee in Mrs. Taylor's position, confronting sexual battery by the agency head behind a closed office door, years of uninvited sexualized attention, dependence upon the harasser's political favor, retaliation after reporting misconduct, the absence of a reasonably safe internal route around the harasser, and delayed disability accommodations, would have felt compelled to resign.

46. NCDOI's continued inaction despite repeated notice, its delayed accommodation process, the alleged retaliation following protected reports, and its failure to provide an effective path independent of Causey reasonably permit the inference that it knowingly allowed the intolerable conditions to persist. Plaintiff alleges that those acts and omissions foreseeably, and in fact, forced her resignation.

47. On March 4, 2026, Mrs. Taylor resigned. Her resignation was the culmination of the intolerable conditions alleged, not an abandonment of employment or a preferred career choice.

48. The resignation ended an approximately eighteen-year State career only a limited number of years before Mrs. Taylor anticipated retirement. She lost salary, health and employment

benefits, additional service credit, increased pension value and retirement security, and the opportunity to complete the final years of State service.

49. The public rupture of her career, the stigma associated with reporting an elected official, and the loss of her established State position have materially diminished her ability to obtain comparable employment. She has suffered severe emotional distress, humiliation, anxiety, fear, loss of professional identity, and aggravation of existing psychological conditions.

50. Mrs. Taylor timely signed and filed EEOC Charge No. 435-2026-00946 identifying sex, disability, and retaliation. On August 4, 2026, the EEOC issued its determination and notice of right to sue, which may be found attached hereto as **Exhibit 7.**

FIRST CLAIM FOR RELIEF

Sexual Harassment And Hostile Work Environment in Violation of Title VII of the Civil Rights Act of 1964, As Amended (42 U.S.C. §§ 2000e—2000e-17)

Against Defendants State of North Carolina and N.C.D.O.I.

51. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

52. Plaintiff experienced unwelcome harassment based upon her sex, including repeated sexualized communications and physically threatening and humiliating conduct culminating in a nonconsensual kiss by the agency head behind a closed office door.

53. Plaintiff experienced frequent sexualized conduct, extreme severity in the form of unwanted physical contact, humiliation and physical threats to her person, and substantial interference with Plaintiff's ability to work. The conduct was severe or pervasive enough to alter the terms and conditions of her employment.

54. Causey was NCDOI's elected head and exercised ultimate authority over Plaintiff's position. His status, NCDOI's notice, and the absence of effective corrective action provide a basis for employer liability.

55. The violation caused back pay, front pay, benefits and retirement losses, diminished earning capacity, severe emotional distress, and other damages.

SECOND CLAIM FOR RELIEF

Constructive Discharge on the Basis Of Sex In Violation of Title VII of the Civil Rights Act of 1964, As Amended (42 U.S.C. §§ 2000e—2000e-17)

Against Defendants State of North Carolina and N.C.D.O.I.

56. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

57. Title VII prohibited NCDOI from discharging or otherwise discriminating against Plaintiff concerning the terms, conditions, and privileges of employment because of sex.

58. Plaintiff's conditions became so objectively intolerable that a reasonable person in her position would have felt compelled to resign. This claim rests not on mere criticism or unpleasantness, but on sexual battery by the agency head on government property during work hours, years of sexualized attention, dependence upon the harasser for continued appointed employment, retaliation and isolation after reporting concerns, and the absence of a safe channel independent of the harasser, all .

59. NCDOI knew of, permitted, and failed to correct the conditions. Its acts and omissions allowed the conditions to persist to the point of forced resignation.

60. Plaintiff actually resigned on March 4, 2026. The constructive discharge was because of and inseparable from the sex-based harassment and discrimination alleged.

61. As a direct and proximate result, Plaintiff lost wages, benefits, pension value, retirement security, professional standing, and comparable reemployment opportunities and suffered severe emotional distress.

THIRD CLAIM FOR RELIEF

Retaliation In Violation of Title VII of the Civil Rights Act of 1964, As Amended (42 U.S.C. §§ 2000e—2000e-17)

Against Defendants State of North Carolina and N.C.D.O.I.

62. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

63. Plaintiff opposed conduct she reasonably believed violated Title VII and attempted to report discrimination and harassment.

64. NCDOI and its employees and agents thereafter subjected her to materially adverse treatment, including isolation, removal or alteration of assignments, hostility, and conditions culminating in constructive discharge, any of which could dissuade a reasonable person from protected reporting.

65. The retaliatory conduct caused the damages alleged herein.

FOURTH CLAIM FOR RELIEF

Failure to Provide Reasonable Accommodation in Violation of the Americans with Disabilities Act of 1990, As Amended (42 U.S.C. §§ 12101 to 12213)

Against Defendants State of North Carolina and N.C.D.O.I.

66. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

67. Plaintiff had disabilities within the ADA; NCDOI had actual notice; Plaintiff was qualified to perform the essential functions of her position with accommodation; and she identified concrete accommodations capable of addressing the documented limitations.

68. Plaintiff communicated her disabilities and desire for accommodation, furnished medical information describing the limitations and potential accommodations, cooperated, and remained willing to consider alternatives. NCDOI was therefore obligated to engage promptly in a bilateral, open, good-faith interactive process.

69. NCDOI obstructed or delayed that process and materially caused its breakdown. It waited approximately twenty-eight days to begin the process, did not issue a determination until February 25, and contemplated ordering equipment after Plaintiff's March 4 resignation. It failed timely to implement an effective accommodation and did not grant the proposed remote-work accommodation.

70. With timely accommodations, Plaintiff could have continued performing her job. NCDOI's refusal and delay caused the damages alleged.

FIFTH CLAIM FOR RELIEF

Disability Discrimination and Constructive Discharge in Violation of the Americans with Disabilities Act of 1990, As Amended (42 U.S.C. §§ 12101 to 12213)

Against Defendants State of North Carolina and N.C.D.O.I.

71. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

72. Plaintiff was disabled, was a qualified individual, and could perform the essential functions of her job with reasonable accommodation.

73. NCDOI discriminated regarding the terms and conditions of employment by delaying or denying effective accommodations and treating Plaintiff less favorably in workplace flexibility.

74. The unresolved disability barriers, combined with NCDOI's prolonged delay after notice and its failure to provide timely effective measures, became objectively intolerable. Viewed with the other workplace conditions NCDOI knowingly permitted, a reasonable qualified employee in Plaintiff's position would have felt compelled to resign.

75. Plaintiff actually resigned on March 4, 2026. Her resignation was a constructive discharge caused at least in part by disability discrimination and NCDOI's failure to accommodate, not a voluntary abandonment of work.

76. The constructive discharge caused the economic, retirement, professional, and emotional damages alleged.

SIXTH CLAIM FOR RELIEF
Retaliation in Violation of the Americans with Disabilities Act of 1990, As Amended (42 U.S.C. §§ 12101 to 12213)
Against Defendants State of North Carolina and N.C.D.O.I.

77. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

78. Plaintiff engaged in protected activity by requesting accommodations and opposing disability discrimination.

79. NCDOI subjected Plaintiff to materially adverse treatment after that activity, including hostility, isolation, adverse changes in work, delay in addressing her requests, and conditions culminating in constructive discharge.

80. The retaliatory conduct caused Plaintiff's damages.

SEVENTH CLAIM FOR RELIEF
Violation of § 126A-14
Against Defendants State of North Carolina and N.C.D.O.I.

81. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

82. North Carolina law protects State employees who report or are about to report violations of State or federal law, rule, or regulation; fraud; misappropriation of State resources; gross mismanagement; or gross abuse of authority, and prohibits discrimination concerning compensation, terms, conditions, location, or privileges of employment because of such reports.

83. Plaintiff reported or was about to report activities she reasonably and in good faith believed included unlawful campaign activity during compensated State time, misuse of State vehicles or resources, violations affecting regulated bail-bond licensing, gross mismanagement, and gross abuse of authority.

84. After and because of those reports, Plaintiff alleges that NCDOI and supervisory officials threatened or otherwise discriminated against her in the compensation, terms, conditions, location, or privileges of employment, including through isolation, diminished or altered assignments, hostility, retaliation, and conditions that contributed to her constructive discharge.

85. Plaintiff's status as an employee subject to the hiring and firing discretion of the Commissioner heightened the coercive effect of the retaliation and made the nominal internal avenues of recourse illusory because the official implicated in the reports controlled her appointment and headed the agency.

86. Plaintiff was injured by the retaliation and seeks all legally available relief, including injunctive relief, damages, reinstatement or front-pay relief as appropriate, back wages, restoration or compensation for lost benefits and seniority, costs, fees, and any enhanced damages authorized for a willful violation.

87. Plaintiff pleads this count under the whistleblower protection statutes applicable when the conduct occurred, including former N.C. Gen. Stat. §§ 126-84 through 126-88, and any

valid successor provisions, including N.C. Gen. Stat. § 126A-14-3, subject to proof of applicable coverage, procedure, and limitations.

EIGHTH CLAIM FOR RELIEF
ASSAULT AND SEXUAL BATTERY
Against Defendant John Michael Causey, Individually

88. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

89. Causey intentionally caused harmful and offensive contact to the person of Plaintiff and placed Plaintiff in apprehension of such contact when, during work hours and on government property, he entered her office, closed the door, hugged her, and kissed her on the mouth without consent.

90. As a direct and proximate result of Defendant's assault and sexual battery, Plaintiff suffered severe injury, including egregious emotional and physical pain and suffering.

91. Causey's actions were calculated to use his power and authority over Plaintiff to cause her harm.

92. Causey's actions were further aggravated by his special relationship with Plaintiff's family that he used to manipulate Plaintiff.

93. Causey's conduct was willful, wanton, malicious, and in conscious disregard of Plaintiff's rights and supports compensatory and punitive damages.

NINTH CLAIM FOR RELIEF
DENIAL OF EQUAL PROTECTION UNDER ARTICLE I, § 19 OF THE NORTH CAROLINA CONSTITUTION—*Corum* Claim
Against Defendant John Michael Causey in His Capacity as Commissioner of Insurance of North Carolina; Defendant the State of North Carolina; and Defendant N.C.D.O.I.

94. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

95. Article I, § 19 of the North Carolina Constitution provides, in pertinent part, that "[n]o person shall be denied the equal protection of the laws." This guarantee is contained within North Carolina's Declaration of Rights and protects the personal and individual rights of North Carolina citizens against unconstitutional State action.

96. Defendant John Michael Causey was, at all times relevant to this claim, the duly elected North Carolina Commissioner of Insurance, the head of the North Carolina Department of Insurance, and a State actor clothed with and exercising the authority of the State of North Carolina.

97. This claim is asserted against Causey solely in his official capacity, the State of North Carolina, and N.C.D.O.I., and seeks a direct remedy under the North Carolina Constitution for State action that deprived Plaintiff of the equal protection of the laws.

98. Mrs. Taylor was hired at the direction of the Commissioner and worked within the State agency that he controlled as its elected Commissioner. Causey exercised extraordinary governmental and employment authority over Mrs. Taylor, including authority directly affecting her position, the conditions under which she worked, and her continued State employment.

99. Causey also occupied a position of personal trust arising from his longstanding friendship with Mrs. Taylor's family. He repeatedly encouraged Mrs. Taylor to bring concerns directly to him, including concerns arising from her employment with the Department.

100. Mrs. Taylor alleges that Causey abused both that trust and the governmental authority of his office. He subjected Mrs. Taylor to repeated and unwelcome sexualized communications and advances while simultaneously occupying the highest position of authority within her employing State agency.

101. Causey's discriminatory conduct ultimately escalated beyond words, when on June 6, 2025, during government work hours and on government property, Causey entered Mrs. Taylor's office, closed the door behind him, approached her, hugged her, and intentionally kissed her on the mouth without her permission or consent.

102. Causey's unwanted and intentional sexual touching constituted sexual assault and battery as alleged elsewhere in this Complaint. The conduct also constituted sex-based differential

treatment by a State actor exercising the power, authority, access, and privileges afforded to him as the elected head of Mrs. Taylor's State employer.

103. Mrs. Taylor did not consent to being kissed. She did not invite Causey to use the privacy of her government office to obtain sexual or intimate physical contact. Nor did her status as Causey's political appointee, her efforts to maintain cordial relations with the elected official who controlled her professional future, or her preexisting family friendship with Causey constitute consent to sexual contact.

104. No legitimate governmental purpose authorized Causey, as Commissioner, to subject Mrs. Taylor to unwanted sexual touching or to use his governmental position, access to her workplace, or authority over her State employment as an opportunity to obtain unwanted intimate physical contact.

105. Mrs. Taylor alleges that Causey's conduct was intentional, sex-based, arbitrary, discriminatory, and wholly unrelated to any legitimate governmental objective. By subjecting Mrs. Taylor to unwanted sexual touching because of her sex while acting under color of the authority, access, and power of his State office, Causey denied Mrs. Taylor the equal protection of the laws guaranteed by Article I, § 19 of the North Carolina Constitution.

106. The constitutional violation alleged herein was not committed by Causey merely as an unrelated private individual. The circumstances alleged arose from and were inseparably intertwined with the governmental authority Causey exercised over Mrs. Taylor: he was the elected head of her employing State agency; she was hired at his invitation and direction; the encounter occurred in her government workplace during working hours; his authority and control materially contributed to the coercive circumstances confronting Mrs. Taylor; and the absence of an authority within NCDOI superior to Causey materially constrained Mrs. Taylor's ability to protect herself through ordinary institutional channels.

107. Mrs. Taylor consequently alleges a colorable violation of an individual right secured by the North Carolina Constitution resulting from State action, thereby satisfying the first and second requirements applicable to a direct constitutional claim under *Corum v. University of North Carolina* and its progeny.

108. Mrs. Taylor further alleges that no adequate alternative remedy under North Carolina law exists to redress the constitutional injury alleged in this Count.

109. To the extent Mrs. Taylor otherwise could assert common-law assault, battery, intentional infliction of emotional distress, or related tort claims against Causey in his official capacity, those claims are barred by the sovereign and governmental immunity attaching to his office absent an applicable waiver. Accordingly, those causes of action do not provide Mrs. Taylor an available and adequate State remedy against Causey in his official capacity for the constitutional deprivation alleged herein.

110. Mrs. Taylor has asserted assault and sexual battery and other tort claims against Causey in his individual capacity elsewhere in this Complaint. Those claims seek to impose personal liability upon Causey for his individual tortious conduct. They do not provide an adequate remedy for the separate constitutional injury caused by State action and asserted against Causey in his official capacity.

111. Moreover, the North Carolina State Tort Claims Act does not provide an adequate alternative remedy for the constitutional violation alleged here. Mrs. Taylor alleges that Causey's sexual assault and battery was intentional, not negligent. This claim does not arise from the negligence of a State officer, employee, involuntary servant, or agent and is not pleaded as a negligence claim within the remedial scope of the State Tort Claims Act.

112. Further, as the Office of Commissioner of Insurance is subject to the definition of a Constitutional Officer of the executive branch of the state pursuant to the North Carolina Human

Resources Act and is thus not subject to the same, Mrs. Taylor is likewise precluded from seeking recourse via that statutory avenue.

113. Accordingly, sovereign immunity would otherwise leave Mrs. Taylor without an adequate State-law remedy through which to vindicate this constitutional injury. That absence of an adequate alternative State remedy satisfies the third pleading requirement for a direct constitutional claim.

114. The North Carolina Supreme Court recognizes that sovereign immunity cannot itself operate as a barrier to an otherwise valid direct claim necessary to remedy a violation of rights guaranteed by the Declaration of Rights. Where a plaintiff alleges State action, a colorable State constitutional violation, and the absence of another adequate State remedy, sovereign immunity does not bar the direct constitutional claim.

115. Plaintiff therefore alleges all three requirements for a direct constitutional claim recognized under Corum v. University of North Carolina and its progeny:(1) State action; (2) a colorable violation of the North Carolina Constitution; and (3) the absence of an adequate alternative State remedy.

116. As a direct and proximate result of the constitutional violation, Mrs. Taylor has sustained substantial injury, including severe emotional distress, humiliation, mental anguish, aggravation of existing psychological conditions, loss of employment and professional security, lost wages and benefits, impairment of pension and retirement interests, impairment of future earning capacity and reemployment prospects, and other damages to be established at trial.

117. Plaintiff is therefore entitled to a meaningful remedy sufficient to redress the violation of her constitutional rights, including such declaratory, equitable, monetary, or other relief against Causey in his official capacity as the Court determines is legally available, adequate, and appropriate.

TENTH CLAIM FOR RELIEF
SEX DISCRIMINATION, SEXUAL HARRASSMENT, AND SEXUAL ASSAULT AND BATTERY CONSTITUTING DENIAL OF EQUAL PROTECTION AND VIOLATION OF PLAINTIFF'S CIVIL RIGHTS PURSUANT TO 42 U.S.C. § 1983
Against All Defendants

118. Plaintiff re-alleges and incorporates by reference the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

119. The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution commands that no State shall "deny to any person within its jurisdiction the equal protection of the laws."

120. 42 U.S.C. § 1983 provides a cause of action against a person who, under color of State law, subjects or causes another person to be subjected to the deprivation of rights secured by the Constitution and laws of the United States.

121. At all times relevant to this claim, Defendant John Michael Causey was the elected North Carolina Commissioner of Insurance, the head of NCDOI, and a public official clothed with and exercising authority conferred upon him by the State of North Carolina.

122. John Michael Causey acted under color of State law in the conduct giving rise to this claim. Mrs. Taylor was a State employee whom John Michael Causey had appointed to her position, and John Michael Causey possessed substantial governmental authority over Mrs. Taylor's position, the conditions under which she worked, her access to leadership within NCDOI, and the continuation of her appointed State employment.

123. This constitutional deprivation did not arise from a purely private encounter between private citizens. The relationship through which John Michael Causey gained access to and exercised authority over Mrs. Taylor was governmental in character. John Michael Causey was the elected head of Mrs. Taylor's State employer; Mrs. Taylor was his hiree; and the tremendous disparity of governmental and employment authority between the Commissioner and Mrs. Taylor materially affected their interactions.

124. That disparity was intensified by the personal trust John Michael Causey enjoyed because of his longstanding relationship with Mrs. Taylor's family. Mrs. Taylor regarded John Michael Causey as a trusted family friend before and during her employment. John Michael Causey knew of that trust and encouraged Mrs. Taylor to bring workplace concerns directly to him.

125. Mrs. Taylor alleges that John Michael Causey exploited both sources of trust and power. The Commissioner who controlled her political appointment and invited her to come directly to him with employment concerns was simultaneously subjecting her to repeated and unwelcome sexualized communications, comments, and advances.

126. Among other conduct alleged herein, John Michael Causey told Mrs. Taylor, "I might jump your bones. Watch out!!!"; told her, "You're hotter than you realize"; warned her, "Just don't let me catch you in the room alone"; and otherwise directed sexualized attention toward Mrs. Taylor.

127. Mrs. Taylor did not welcome that sexual attention. Because she was John Michael Causey's political appointee and understood that he possessed enormous influence over the continuation of her State employment, however, Mrs. Taylor reasonably feared the consequences of openly rejecting or confronting him.

128. Mrs. Taylor's efforts to placate John Michael Causey, remain cordial with him, deflect sexual statements with humor, or avoid angering the elected official upon whom her professional future depended did not constitute consent to sexual conduct or sexual physical contact.

129. John Michael Causey's sex-based conduct ultimately escalated beyond words. On June 6, 2025, during government working hours, on government property, and inside Mrs. Taylor's government office, John Michael Causey entered Mrs. Taylor's office, closed the door behind him,

approached Mrs. Taylor, hugged her, and kissed her on the mouth without her permission or consent.

130. The contact was intentional, unwanted, harmful, offensive, and sexual in nature. As alleged elsewhere in this Complaint, the conduct constituted an assault and battery against Mrs. Taylor.

131. The constitutional significance of the incident extends beyond the commission of a common-law tort. John Michael Causey was able to exercise the access and coercive authority alleged precisely because of the governmental position he occupied in relation to Mrs. Taylor. At the time of the unwanted sexual contact, John Michael Causey was the elected leader of Mrs. Taylor's State agency; Mrs. Taylor was his political appointee; John Michael Causey exercised substantial governmental power affecting her continued employment; the incident took place in the workplace over which he exercised governmental authority; and no officer within NCDOI occupied a position above him to whom Mrs. Taylor could safely escalate allegations concerning the Commissioner's own misconduct.

132. Mrs. Taylor alleges that John Michael Causey's sexualized conduct, including the intentional and unwanted kissing of his subordinate employee, was motivated by sex and constituted discriminatory treatment because of Mrs. Taylor's sex.

133. John Michael Causey's use and abuse of the authority, access, and coercive power of his governmental office to subject a subordinate State employee to intentional sexual discrimination, sexual harassment, and unwanted sexual physical contact served no legitimate governmental purpose whatsoever.

134. The Equal Protection Clause prohibited John Michael Causey, acting under color of State law, from intentionally discriminating against Mrs. Taylor because of sex, including through sexual harassment and unwanted sex-based physical conduct.

135. By intentionally subjecting Mrs. Taylor to the sex-based treatment alleged herein while acting under color of State law, John Michael Causey deprived Mrs. Taylor of the equal protection of the laws guaranteed by the Fourteenth Amendment.

136. John Michael Causey's violation was intentional, willful, malicious, and undertaken in conscious and reckless disregard of Mrs. Taylor's federally protected rights.

137. At the time of John Michael Causey's conduct, the federal constitutional prohibition against intentional sex discrimination by a State official exercising governmental authority over a subordinate employee was clearly established. A reasonable public official in John Michael Causey's position would have understood that using the authority and access afforded by public office to sexually harass a subordinate employee and intentionally subject that employee to unwanted sexual physical contact because of sex violated the Equal Protection Clause.

138. More fundamentally, no reasonable State official could believe that the Equal Protection Clause permitted an elected agency head to exploit governmental authority over a political appointee to obtain unwanted sexual contact from that employee.

139. John Michael Causey is therefore liable in his individual capacity under 42 U.S.C. § 1983 for the deprivation of Mrs. Taylor's clearly established constitutional rights.

140. The same conduct contributed directly to the objectively intolerable conditions that ultimately caused Mrs. Taylor to leave the State career she had spent approximately eighteen years building.

141. As a direct and proximate result of John Michael Causey's unconstitutional conduct, Mrs. Taylor suffered severe and continuing emotional distress, humiliation, anxiety, fear, mental anguish, aggravation of existing psychological conditions, loss of professional security and professional identity, lost wages and employment benefits, impairment of retirement and pension interests, diminished earning capacity, impairment of her prospects for comparable reemployment, and other damages to be established at trial.

142. The official-capacity component of this claim is asserted against the State, N.C.D.O.I., and John Michael Causey as the incumbent Commissioner of Insurance and therefore as an officer of the State of North Carolina.

143. Plaintiff acknowledges that the State and a State official sued in an official capacity are not "persons" against whom retrospective monetary damages may be recovered under 42 U.S.C. § 1983. Plaintiff therefore does not seek § 1983 compensatory or punitive damages from John Michael Causey in his official capacity.

144. Instead, against John Michael Causey in his official capacity, Plaintiff seeks only such prospective declaratory and injunctive relief as is legally available under 42 U.S.C. § 1983 and the doctrine of *Ex parte Young* to prevent the continuation or recurrence of unconstitutional sex discrimination and sexual harassment through the authority of the Office of the North Carolina Commissioner of Insurance.

145. Against John Michael Causey in his individual capacity, Plaintiff seeks compensatory damages for the injuries proximately caused by his deprivation of Mrs. Taylor's constitutional rights.

146. Because John Michael Causey's conduct was intentional, malicious, and undertaken in reckless or callous disregard of Mrs. Taylor's federally protected constitutional rights, Plaintiff further seeks punitive damages against John Michael Causey in his individual capacity to the fullest extent permitted by federal law.

147. Plaintiff further seeks reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988, together with all other legal and equitable relief available for the violation of Mrs. Taylor's federal constitutional rights.

ELEVENTH CLAIM FOR RELIEF
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Against Defendant John Michael Causey, Individually

148. Plaintiff incorporates the preceding allegations as if restated verbatim herein.

149. Causey knew or reasonably should have known that his conduct in exploiting the family trust extended to him by Mrs. Taylor, his professional and political control over her as an employee, his repeatedly sexualizing their relationship, his subjecting Plaintiff to unwanted physical contact, and then publicly denying said conduct though contradicted by contemporaneous messages was extreme and outrageous conduct and that Plaintiff would be subject to severe mental and emotional distress, and pain and suffering.

150. Causey acted intentionally, willfully, maliciously, and purposely, with the intention to inflict severe emotional distress upon Plaintiff, or with reckless indifference and disregard to its likelihood of causing Plaintiff severe emotional distress. Plaintiff suffered severe emotional distress, including humiliation, anxiety, fear, loss of professional identity, and aggravation of existing psychological conditions.

151. The aforementioned conduct of Defendant Causey constitutes intentional infliction of emotional distress, and as a result of these acts, Plaintiff suffered severe emotional distress, including humiliation, anxiety, fear, loss of professional identity, and aggravation of existing health conditions.

152. By intentionally inflicting emotional distress upon Plaintiff, Causey's willful, wanton, malicious conduct indicates his liability for special and general damages, as well as punitive damages.

TWELTH CLAIM FOR RELIEF
NEGLIGENCE – IN THE ALTERNATIVE
Against Defendant John Michael Causey, Individually

153. Plaintiff incorporates the preceding allegations and pleads in the alternative under Rule 8(d).

154. To the extent actionable conduct is found not intentional, Causey breached a duty of reasonable care and foreseeably injured Plaintiff.

155. The breach caused the damages alleged, specifically resulting in Plaintiffs suffering severe emotional distress, including humiliation, anxiety, fear, loss of professional identity, and aggravation of existing health conditions.

THIRTEENTH CLAIM FOR RELIEF
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS – IN THE ALTERNATIVE
Against Defendant John Michael Causey, Individually

156. Plaintiff incorporates the preceding allegations and pleads in the alternative.

157. Causey negligently created a foreseeable risk of severe emotional distress in light of his knowledge of Plaintiff's vulnerabilities, the family relationship, the employment power imbalance, and the sexualized conduct.

158. His conduct caused severe emotional distress and resulting damages.

PRAYER FOR RELIEF

1. Judgment on all claims against the appropriate Defendant;
2. Back pay, front pay, lost wages, lost benefits, loss of earning capacity, and all other employment losses;
3. Compensation for lost State-service credit, pension accruals, increased retirement value, retiree-health value, seniority, and other retirement security proved at trial;
4. Compensatory damages for severe emotional distress, humiliation, anxiety, mental anguish, aggravation of existing conditions, reputational and professional injury, and other losses;
5. Punitive damages against Causey individually to the fullest extent permitted by law;
6. All remedies available under Title VII, the ADA, the *Corum* doctrine, and the North Carolina Whistleblower Act, including enhanced damages for any willful statutory violation where authorized;
7. Declaratory and injunctive relief, including correction of personnel records and such prospective relief as is lawful and appropriate;
8. That all issues of fact be tried by a jury;
9. Reasonable attorneys' fees, costs, and pre- and post-judgment interest; and
10. All further relief the Court deems just and proper.

Respectfully submitted this 2nd day of November, 2026.

[SIGNATURE ON FOLLOWING PAGE]

HOWARD STALLINGS LAW FIRM

By: /s/ Lee A. Rodio

Robert H. Jessup, IV (State Bar No. 42945)
Lee A. Rodio (State Bar No. 61250)
PO Box 12347
Raleigh, NC 27605
rjessup@howardstallings.com
lrodio@howardstallings.com
Office: (919) 821-7700
Attorneys for Plaintiff