

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
 EEOC

_____ and EEOC

State or local Agency, if any

Name (indicate Mr. Ms. Mrs.)

Home Phone (Incl. Area Code)

Date of Birth

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 T.D. Jakes Foundation	No. Employees, Members 15+	Phone No. (Include Area Code)
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Street Address 5500 Preston Rd., Ste. 250,	City, State and ZIP Code Dallas, Texas 75205
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DISCRIMINATION BASED ON (Check appropriate box(es).)

RACE COLOR SEX RELIGION NATIONAL ORIGIN
 RETALIATION AGE DISABILITY OTHER (Specify below.)

DATE(S) DISCRIMINATION
TOOK PLACE
Earliest (ADEA/EPA) - Latest
(All)
March 2025-June 18, 2025

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

(Please find the attached narrative statement of facts).

Charging Party is represented by: Erica Healey-Kagan of Filippatos PLLC
425 Madison Ave Suite 1502, New York, NY
ehaleykagan@filippatoslaw.com
212-202-0234, ext. 414

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.

NOTARY – When necessary for State and Local Agency Requirements

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

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)

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

_____X
[REDACTED]

**EEOC CHARGE OF
DISCRIMINATION**

Claimant,

**NARRATIVE
STATEMENT**

- against -

T.D. JAKES FOUNDATION,

Respondent.

_____X

Claimant [REDACTED] hereby alleges the following against Respondent, T.D. Jakes Foundation, in support of her claims of discrimination and unlawful retaliation in violation of Texas Labor Code §21.055, Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978, and by the Civil Rights Act of 1991, Pub. L. No. 102-166) ("Title VII"); and the Americans with Disabilities Act of 1990 ("ADA"), 42 U.S.C. §§ 12101, et seq.

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all relevant times hereto, Charging Party [REDACTED] ("Charging Party" or "[REDACTED]") has been a resident of the State of South Carolina.
2. At all relevant times hereto, T.D. Jakes Foundation ("Respondent" or "Foundation") was and is a non-profit organization maintaining its principal place of business at 5500 Preston Rd., Ste. 250, Dallas, Texas 75205.
3. At all relevant times hereto, Charging Party was an employee of Respondent, working as Chief Advancement and Impact Officer.

4. Upon information and belief, Respondent employs more than fifteen (15) individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging Party is proceeding herein.

Material Facts

5. As will be shown herein, Charging Party is an employee who was unlawfully discriminated against and retaliated against after opposing Respondent's discriminatory practices.

I. [REDACTED] Illustrious Career

6. [REDACTED] is a highly accomplished professional with a Ph.D. in Political Science from Yale University, a Master of Arts in International Economics and African Studies from The Johns Hopkins University, and a Bachelor of Arts with honors from Spelman College.

7. Prior to joining the Foundation, [REDACTED] built an illustrious career in nonprofit leadership and fundraising, including serving as Senior Director of Leadership Gifts at The Robin Hood Foundation, where she cultivated, solicited, and managed relationships with \$100k+ donors, including the Board of Directors.

8. Following her time at The Robin Hood Foundation, [REDACTED] worked as Head of Client Service at Raptor Capital Management.

9. Then she built marketing and investor relations infrastructure and strategy as the Partner & Director of Investor Relations and Marketing at High Rise Capital Management.

10. [REDACTED] returned to the non-profit sector as the Executive Director of the Tribeca Film Institute where she revived the Institute and raised millions of dollars.

11. [REDACTED] also shared her expertise with the University of South Carolina Beaufort and Lawrence University of Wisconsin before joining T.D. Jakes Foundation.

II. ██████████ is Hired by the Foundation and is Pressured to Move to Dallas, Despite her Caregiver Responsibilities in South Carolina

12. From the beginning of her employment with the Foundation, ██████████ was treated differently from her colleagues.

13. In her cover letter and interviews for the position of Chief Advancement and Impact Officer at the Foundation, ██████████ made clear that she needed to care for her elderly parents.

14. Since the job was remote, she did not think that she needed to specify that she needed to remain with them in South Carolina.

15. After ██████████ discussed this in her cover letter and in her interviews, she continued to be assured that the job was remote.

16. However, after beginning her employment, ██████████ was the only senior executive pressured by Chairman T.D. Jakes to move to Dallas, despite the Foundation being fully aware of her caregiving responsibilities.

17. The only other senior level executive to live in Dallas was the CEO, Kelley Cornish.

18. The Chief Administrative Officer lives in Philadelphia, Pennsylvania, the Chief Strategy Officer lives in Atlanta, Georgia, and the Chief Financial Officer lives in Jackson, Mississippi.

19. ██████████ was the only Officer pressured to move, despite the Foundation being aware that she could not move due to her caregiver responsibilities for her elderly parents.

III. ██████████ is Shocked by the State of the Foundation and is Met with Significant Obstacles to Properly Performing her Job

20. Upon arriving at the Foundation, ██████████ discovered that the institution was severely underfinanced and lacked basic infrastructure required for nonprofit compliance and success.

21. For example, there was no CRM or other coherent system for storing sensitive data, such as donor data, and therefore no way to ensure security.

22. Similarly, there were no standard compliance or back-office documents for standard due diligence and compliance.

23. Further, when ██████████ asked for strategy memoranda and planning documents related to the Champions of Change campaign, a fundraising campaign that was initiated before ██████████ joined the Foundation, she was told that no such documents existed.

24. ██████████ also quickly learned that the members of her fundraising staff, who she expected would be able to independently identify prospects, cultivate, solicit, write and submit grant proposals with limited supervision, would instead require significant hands-on assistance from ██████████

25. The CEO not only knew this to be the case but also warned ██████████ that extra handholding and extra time would be required to manage her staff—as did the CFO.

26. Therefore, rather than being able to focus on relationship-building and other strategic approaches to fundraising and strengthening the Foundation, ██████████ needed to work very closely with her subordinates to ensure grant proposals and other cultivations/solicitations were properly completed.

27. Despite these obstacles, ██████████ succeeded in dramatically increasing grant proposals—from two (2) year over year to more than thirty (30) during her tenure, in large part due to ██████████ work—and brought influential people into the Foundation's orbit.

28. Despite ██████████ vast experience fundraising for 501(c)(3) organizations, her ideas were constantly blocked, and she was met with many obstacles.

29. For example, ██████████ consistently warned the Foundation about the perils of transactional fundraising.

30. However, ██████████ experience and cautionary advice were ignored and the transactional fundraising project in April 2025 was largely unsuccessful.

31. When ██████████ tried to build infrastructure to create pathways for sustainable fundraising, these efforts were thwarted.

32. She would only ever get approval for transactional fundraising, which is not a long-term solution to grow a Foundation.

33. Despite the obstacles ██████████ faced, she was succeeding in her new role.

34. On or around February 25, 2025, ██████████ met with opera star Denyce Graves at the Lake Nona Impact Forum in Orlando, Florida, bringing Ms. Graves into the Foundation's orbit, to the excitement of CEO Kelley Cornish and Chairman Jakes.

35. ██████████ did the same with a list of more than 20 influential people met and cultivated at the Milken Global Forum in May 2025.

36. Again, she was praised by the CEO and Chairman Jakes.

37. In a one-on-one meeting with Ms. Cornish in March 2025, ██████████ was given only positive feedback.

38. Ms. Cornish was effusive in her praise for the way ██████████ had been able to bring her team together. She said that she could see that they were bonding, and she was thrilled.

IV. ██████████ Observes Discriminatory Conduct and is Subject to Retaliation and Unlawful Termination

39. Later in March 2025, ██████████ was asked to organize an event in Martha's Vineyard for August 2025, with her colleague Marc Alexander, Chief Strategy Officer.

40. They decided to host a themed panel centered around Aisha Bowe, a Black aerospace engineer, who was scheduled to be on the Blue Origin flight on April 14, 2025.

41. ██████████ proposed Neil deGrasse Tyson, well-known astrophysicist and public intellectual, as the interviewer for the panel.

42. ██████████ sent the idea to Ms. Cornish and Chairman Jakes, through his assistant Beverly Robinson.

43. ██████████ was shocked when told that Dr. deGrasse Tyson was "out of the question *because he is an atheist.*"

44. ██████████ was then explicitly told that "*the rule is no atheists, agnostics, or homosexuals* can be invited to share our stage or come to our events."

45. When ██████████ asked other colleagues about "the rule," they all confirmed they were aware of the Foundation's discriminatory practices.

46. ██████████ made clear that this rule is discriminatory and unlawful.

47. She spoke about it with Beverly Robinson, Marc Alexander, and Cammy Garner, a liaison between the Church and the Foundation.

48. ██████████ and Mr. Alexander were then forced to change the event to a discussion between three men—Strive Masiyiwa, Leke Osinubi, and Jim Anderson.

49. This discriminatory "rule" surfaced again when ██████████ and Ms. Cornish were interviewing candidates for the Foundation's Program Team.

50. After interviewing a candidate that both ██████████ and Ms. Cornish believed would be a great fit, ██████████, Ms. Cornish, and two other employees remained on the Zoom call.

51. Ms. Cornish asked the others what they thought about the candidate. [REDACTED] shared that she thought he would be great for the position.

52. Ms. Cornish agreed but then said, "he said that he needed to speak with his family about the job. In fact, he mentioned his family a couple of times, but he never said, 'my wife.' **You guys don't think he could be married to a man, right?**"

53. [REDACTED] was shocked by this blatant discriminatory practice and continued to voice her concerns that these practices were unlawful.

54. One goal of [REDACTED] was to align the Foundation with non-profit best practices, through which the Foundation's ratings, e.g., on Charity Navigator and GuideStar, could be improved.

55. To this end, [REDACTED] expressed concern over the Foundation's spending habits, which affects the critically important program versus non-program spending ratio, to other senior leadership, especially her concerns regarding how she could defend some expenses to prospective donors, such as purchasing first class plane tickets, expensive exhibits and events, and other expenses unrelated to programs.

56. [REDACTED] concerns, which both the Chief Administrative Officer (CAO) and Chief Financial Officer (CFO) shared, were ignored. Further, Ms. Cornish's behavior was so toxic that [REDACTED] feared bringing these issues to her attention.

57. Following this interaction with senior leadership, [REDACTED] relationship with Ms. Cornish grew even more tumultuous, and she stopped giving any feedback to [REDACTED] altogether and started excluding her from meetings and discussions critical to her work success.

58. In April 2024, [REDACTED] was the only senior executive to work consistently in the booth at the International Leadership Summit Conference in Orlando.

59. While at this conference, ██████████ learned that her parents' caregiver's father had passed away and would be unable to work.

60. ██████████ scrambled to find someone else who could assist with her parents' care so she could remain at the conference.

61. While she was able to find assistance and remain in Orlando, it was extremely difficult because, during this time, ██████████ mother had fallen and required even more assistance.

62. This caused significant emotional distress for both ██████████ and her mother.

63. In January 2025, ██████████ father was very ill and under intensive medical care.

64. ██████████ was supposed to go to Atlanta for an MLK Day event with her team but needed to remain home with her father.

65. A few days later, Ms. Cornish told ██████████: "I don't think you can do this job if you cannot be where we need you at a moment's notice," and berated ██████████ for missing the Atlanta event.

66. Ms. Cornish made it clear that ██████████ would need to "get it together" to keep her job.

67. The January 2025 incident, combined with the April 2024 incident, made it so that ██████████ was forced to make the painful decision to place her mother in a Memory Care facility because Ms. Cornish's demands were clear: she needed to make the impossible choice between her caregiver responsibilities and her career with the Foundation—she could not do both.

68. However, even this devastating sacrifice was not enough for Ms. Cornish.

69. Upon information and belief, Ms. Cornish would encourage other employees to file HR complaints against [REDACTED] while at the same time encouraging [REDACTED] to “keep the pressure on employees; hold them accountable,” forcing [REDACTED] to be “bad cop.”

70. On April 23, 2025, after Ms. Cornish failed to attend a previously scheduled meeting with an important prospective funder, [REDACTED] stepped in for Ms. Cornish and led the meeting.

71. At this meeting, [REDACTED] was told that the funding the Foundation was in line for would have to go through additional levels of approval on the donor's side.

72. Instead of thanking [REDACTED] for stepping up to the plate and ensuring the meeting continued despite Ms. Cornish's absence, [REDACTED] was berated and told that Ms. Cornish needed to be included in all meetings.

73. Ms. Cornish then blamed [REDACTED] for the fact that the donor needed to go through additional layers of approval—a completely baseless accusation.

74. From this point forward, [REDACTED] was ostracized, excluded from meetings, berated in front of colleagues, and blocked from moving any projects or ideas forward.

75. At a dinner on June 11, 2025, at Chairman Jakes' home, Ms. Cornish and [REDACTED] were both in attendance.

76. However, despite the majority of Foundation guests being contacts of [REDACTED], Ms. Cornish did not speak with [REDACTED] once, not even when [REDACTED] complimented Ms. Cornish on her remarks.

77. This retaliatory behavior culminated on June 18, 2025, when [REDACTED] was unlawfully terminated.

78. [REDACTED] was told her termination was due to "performance and overall fit."

79. This is clearly pretextual since [REDACTED] was consistently prevented from fulfilling her responsibilities.

80. Furthermore, [REDACTED] **termination was clearly retaliation for her opposition to the Foundation's discriminatory practices regarding atheists, agnostics, and homosexuals.**

81. [REDACTED] termination was also discriminatory based on the Foundation's perception that [REDACTED] was associated with or supportive of individuals in protected classes (atheists, agnostics, and homosexuals).

82. Additionally, the Foundation discriminated against [REDACTED] based on her associational disability—specifically, her need to care for her elderly and ailing parents, which substantially limited her major life activities including caring for others.

83. The Foundation regarded [REDACTED] as having an impairment that substantially limited her ability to care for her parents and discriminated against her on that basis.

84. Based on the foregoing, the evidence is clear that [REDACTED] termination, which occurred exactly three months after she opposed the Foundation's discriminatory practices, is discrimination and retaliation in violation of Texas Labor Code, Title VII, and the ADA.

85. This discriminatory and retaliatory conduct has inflicted profound harm on [REDACTED] [REDACTED] career, health, and overall well-being, stalling her professional growth and causing lasting emotional damage.

86. As a result of Respondent's actions, Charging Party's career is not only at a standstill but she feels extremely degraded, victimized, embarrassed, and emotionally distressed.

87. Respondent's actions have been malicious, willful, outrageous, and done with full knowledge of their unlawful nature.

88. Respondent's flagrant disregard of the above-referenced laws evidences a pattern and practice of discrimination and retaliation that falls squarely within the EEOC's investigatory and enforcement statutory mandates to investigate, and enforce prohibitions against, discriminatory conduct in the workplace.