

KEEGAN GLICK 2014 AUG 11 P 12:09 SUIT NUMBER: 145035  
VERSUS 26th JUDICIAL DISTRICT COURT  
BRETT MALONE, INDIVIDUALLY AND :  
IN HIS OFFICIAL CAPACITY and THE :  
PHILADELPHIA CENTER : BOSSIER PARISH, LOUISIANA

**PETITION FOR DAMAGES**

The petition of KEEGAN GLICK, with respect, represents:

1.

Plaintiff is:

KEEGAN GLICK, a person of the age of majority domiciled in Shreveport, Caddo Parish, Louisiana.

Defendants are:

BRETT MALONE, individually and in his official capacity as an employee of The Philadelphia Center, a person of the age of majority domiciled in Shreveport, Caddo Parish, Louisiana; and

THE PHILADELPHIA CENTER, a Louisiana Non-Profit Corporation, authorized to do and doing business in Shreveport, Caddo Parish, Louisiana.

2.

In early June 2013, a representative of The Philadelphia Center contacted the Michael Turney Modeling Agency (the "Turney Agency") regarding the need for two male models for The Philadelphia Center's annual auction against AIDS to be held on August 3, 2013, at the Horseshoe Casino Riverdome in Bossier City, Louisiana.

3.

The requirements for the models were "two model-esque boys for The Philly Auction. Paying gig 100.00, walk around looking fab in togas encouraging people to bid on items."

4.

The Turney Agency agreed to provide two male models, one being the Plaintiff Keegan Glick, a student under the age of 21. The Turney Agency agreed to provide two models with the understanding that its models were to serve as affable, themed characters at the event. The Philadelphia Center told the Turney Agency that its models would be

-1-

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dressed in traditional togas and that one model would serve drinks and the other would direct guests to silent auction tables.

5.

Upon arriving at the event, the models' traditional toga costumes were drastically altered and the models were dressed in nothing more than loin cloths. Further, the models' bodies were also painted in a sexual pattern and bejeweled.

6.

Defendant Brett Malone ("Malone") committed acts of assault and battery upon Plaintiff which caused Plaintiff damages and injuries for which Malone is liable. Those acts of assault and battery include, but are not limited to, the following:

- (A) Malone made inappropriate sexual comments to Plaintiff;
- (B) Malone made sexual overtures to Plaintiff; and
- (C) Malone repeatedly touched Plaintiff on his buttocks and chest and near the genital area.

7.

With Malone's encouragement, many guests touched Plaintiff inappropriately and lifted Plaintiff's toga costume to reveal the Plaintiff's lower body, and made crude, sexual statements and overtures to Plaintiff.

8.

Malone set the tone for the event. Had he conducted himself professionally, and intervened to correct unruly guests, these problems could have been averted. Instead Malone harassed Plaintiff and encouraged guests to do likewise. Malone subjected Plaintiff to a hostile working environment. Malone committed acts of battery upon Plaintiff and allowed others to do the same.

9.

The offensive conduct of Malone and the event guests escalated as the evening advanced, to the point that Plaintiff feared for his safety. By the end of the evening Plaintiff was not working a charity social event, he was trying to flee an orgy.

10.

Malone is liable to Plaintiff for the damages Plaintiff suffered and incurred as a result of the acts of assault and battery he committed upon Plaintiff.

11.

Defendant The Philadelphia Center is liable *via respondent superior* to Plaintiff for damages arising from the torts of its employee, Brett Malone.

12.

Defendant The Philadelphia Center is liable for the torts of assault and battery committed upon Plaintiff by its guests. The Philadelphia Center is liable because its employee, Brett Malone, had actual knowledge of the acts, participated in the acts, and encouraged others to do the same.

13.

Plaintiff seeks, and is entitled to recover from Defendants, damages resulting from the assault and battery including, but not limited to, emotional distress, pain and suffering, and attorney's fees.

WHEREFORE PLAINTIFF PRAYS that this petition be deemed good and sufficient and that upon the conclusion of all legal delays there be judgment in favor of Plaintiff and against all Defendants awarding him full relief.

Respectfully submitted:

DOWNER & WILHITE, L.L.C.

By: 

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ATTORNEYS FOR PLAINTIFF  
KEEGAN GLICK

**SERVICE INFORMATION ON FOLLOWING PAGE**

**PLEASE SERVE:**

**Brett Malone  
c/o The Philadelphia Center  
2020 Centenary Blvd.  
Shreveport, LA 71104**

**The Philadelphia Center  
through their registered agent:  
Byron A. Richie  
1800 Creswell Avenue  
Shreveport, LA 71101**

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OF COUNSEL  
TIMOTHY W. WILHITE  
PAMELA R. JONES

August 4, 2014

**VIA FAX 965-2713**

Bossier Parish Clerk of Court  
P.O. Box 430  
Benton, Louisiana 71006

Re: Keegan Glick v. Brett Malone, Individually and in his  
Official Capacity and The Philadelphia Center  
26<sup>th</sup> Judicial District Court, Bossier Parish, Louisiana

Dear Clerk:

Enclosed for fax filing is the Plaintiff's Petition for Damages. The original and service copies, together with my firm check in the amount of \$400.00, will be placed in the mail to you today. Please return a "filed" copy of the Petition to me at your earliest convenience. If you have any questions or need additional information, please call.

Sincerely,

DOWNER & WILHITE, L.L.C.

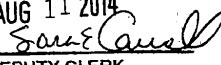
By: 

Kim DeBroeck  
Assistant to Pamela R. Jones

PRJ/kld  
Enclosure

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