

Jurisdiction and Venue

2. Plaintiff's state law claims present questions over which this court has jurisdiction. The Court also has supplemental jurisdiction over Plaintiff's Title VII claims.

3. Venue is proper in this District because the unlawful actions and practices alleged herein occurred in DeKalb County, Georgia, and because Defendants maintain a retail location in this county.

Administrative Proceedings

4. Plaintiff timely filed a Charge of Discrimination with the EEOC on May 16, 2025 and received the Notice of Right to Sue on or August 13, 2025. Plaintiff has complied with all administrative prerequisites to filing this lawsuit under Title VII of the Civil Rights Act of 1964.

The Parties

5. Plaintiff Stephanie Dhondt is a citizen of the United States and resident of the state of Georgia.

6. Defendant John Dekalb, Inc. d/b/a Siggers Hairdressers (hereinafter "Siggers Hairdressers"), is a business entity with its principal place of business located at 2166 Northlake Parkway, Tucker, Georgia 30084, in DeKalb County, Georgia. It may be served through its agent John Siggers at 5290 Peachtree Dunwoody Road, Atlanta, DeKalb County, Georgia.

7. Defendant Siggers Hairdressers is an employer within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, employing fifteen or more individuals during the relevant time period.

8. Defendant John Siggers is an individual who was at all relevant times the co-owner and operator of Siggers Hairdressers. He is being sued in his individual capacity.

9. Defendant Carol Siggers is an individual who was at all relevant times the co-owner and operator of Siggers Hairdressers. She is also the CFO and Secretary of Siggers Hairdressers. She is being sued in her individual capacity.

10. Defendant Siggers Real Estate Holdings, LLC (hereinafter “Siggers Holdings”) is a Georgia LLC which owns the commercial building in which Siggers Hairdressers operates. It may be served through its agent John Siggers at 2166 Northlake Parkway Tucker, DeKalb County, Georgia.

11. Plaintiff was employed by Siggers Hairdressers as a Cosmetology Apprentice from March 2023 to May 2025.

12. At all relevant times, Mr. Siggers was acting in the course and scope of his ownership and operation of Defendant Siggers Hairdressers, and acted with actual and apparent authority in that his ownership of the business aided his commission of the torts alleged herein, making Siggers Hairdressers and Carol Siggers vicariously liable for the actions of John Siggers.

Facts

13. Plaintiff Stephanie Dhondt was hired by Defendants as a Cosmetology Apprentice in March 2023.

14. Ms. Dhondt was paid minimum wage and worked at Defendants’ salon located at 2166 Northlake Parkway, Tucker, Georgia 30084.

15. Defendant John Siggers serves as the owner and operator of Siggers Hairdressers. The business is also owned and operated by his wife Carol Siggers.

16. Defendants John and Carol Siggers’ son John Siggers Jr., and daughter-in-law Amy Siggers also work at the salon.

17. Defendant Siggers maintains an apartment and office space in the basement area of the salon, which he used to conduct his predatory behavior away from public view.

18. The basement area contained cameras that Defendant Siggers covered with envelopes to prevent recording of his conduct. He also had a television installed to display security footage in his basement office, which allowed him to monitor the upstairs cameras and see if anyone was coming downstairs to his office.

19. A few months into Ms. Dhondt's employment, Defendant John Siggers began his systematic campaign of sexual harassment and assault against Ms. Dhondt.

20. Defendant Siggers knew that Ms. Dhondt was only earning minimum wage and that she was struggling to pay her bills and financially support her child. He offered Ms. Dhondt cash while making clear that she had to "do something in return."

21. Defendant Siggers' typical pattern involved sitting in his office chair downstairs holding \$100 bills while demanding sexual favors from Ms. Dhondt.

22. On at least ten occasions, Defendant Siggers digitally penetrated Ms. Dhondt by putting his hands down her pants without her consent.

23. Defendant Siggers required Ms. Dhondt to masturbate him in his downstairs apartment during working hours on a frequent basis.

24. Defendant Siggers repeatedly and without consent touched Ms. Dhondt's butt, breasts, and other intimate parts of her body.

25. Defendant Siggers put his hands up Ms. Dhondt's shirt and touched her breasts without her consent.

26. Defendant Siggers forced unwanted hugging upon Ms. Dhondt while holding money and pressuring her for sexual acts.

27. Defendant Siggers repeatedly solicited oral sex and sexual intercourse from Ms. Dhondt.

28. On at least three or four occasions, Defendant Siggers exposed his penis to Ms. Dhondt while begging for sexual contact.

29. When Ms. Dhondt refused Defendant Siggers' sexual advances, he would threaten her financial security by saying "Are you kidding me? How are you going to have money?"

30. Defendant Siggers called Ms. Dhondt downstairs to his office on nearly a daily basis when she worked at the salon under the pretense of discussing work matters, but instead used these occasions to sexually assault and harass her.

31. When Ms. Dhondt attempted to refuse to go downstairs, Defendant Siggers would become angry and demand that she come down immediately.

32. In November 2024, the father of Ms. Dhondt's son died, creating additional financial and emotional stress for Ms. Dhondt.

33. After learning of this tragedy, Defendant Siggers callously exploited Ms. Dhondt's increased vulnerability by intensifying his sexual harassment and emphasizing that she needed money for her family.

34. Defendant Siggers' predatory conduct was not limited to Ms. Dhondt, but was part of a longstanding pattern of sexual harassment directed at young female employees and customers.

35. Between 2022 and 2024, at least three victims filed police reports with the Dekalb Police Department against Mr. Siggers detailing sexual assault or battery.

36. Hannah Irvin was employed by Defendants from January 2, 2023, through December 2023.

37. She witnessed Defendant Siggers calling Ms. Dhondt downstairs on a daily basis and advised Ms. Dhondt to record their interactions due to her concerns about the inappropriate nature of the conduct.

38. Katlyn Savalli was employed by Defendants from November 2023 to April 2024. Ms. Savalli witnessed Mr. Siggers inappropriately touch Ms. Dhondt on multiple occasions.

39. Defendant Siggers also subjected Ms. Savalli to inappropriate sexual touching on 10-15 occasions, including grabbing her butt and putting his hands up her skirt and shirt.

40. Defendant Siggers offered Ms. Savalli money for sexual favors while grabbing his crotch in a sexually explicit manner.

41. Sebastian Esteves was employed by Defendants from December 2022 through November 2023. Mr. Esteves witnessed Mr. Siggers put his hands on Ms. Dhondt's butt on 8-9 occasions and saw him touch her breasts.

42. Mr. Esteves found Ms. Dhondt crying downstairs on multiple occasions due to Mr. Siggers' sexual harassment.

43. When Mr. Esteves attempted to protect Ms. Dhondt by going downstairs to interrupt the harassment, Mr. Siggers retaliated against him by cutting his work hours and days.

44. In November 2023, Mr. Esteves reported to Carol Siggers that Mr. Siggers was giving Ms. Dhondt and another female employee money at work in exchange for sexual acts with him.

45. Despite receiving this serious report of sexual misconduct, Carol Siggers took no corrective action whatsoever.

46. As a result, Mr. Siggers sexual harassment continued.

47. An female employee named Serena worked for Siggers for only three days in December 2023.

48. On her third day, Defendant Siggers pushed her against a wall, tried to take off her top, and groped her despite her clearly telling him no. She subsequently filed a police report regarding the incident and never returned to her job at Siggers.

49. Zoe Flowers was employed by Defendants from January 2024 through May 2024.

50. Defendant Siggers called Ms. Flowers downstairs where he would stroke her hair and make inappropriate comments about her appearance.

51. Defendant Siggers pressed his body into Ms. Flowers from behind during supposed training sessions. He also inappropriately touched her breasts and grabbed her hips.

52. When Ms. Flowers was only 17 years old, Defendant Siggers told her she would look sexy and cute in a Hooters uniform.

53. Mr. Siggers' pattern of sexual harassment extended to customers as well. A female customer was subjected to inappropriate sexual conduct beginning in 2020 when she received free services due to financial difficulties.

54. Defendant Siggers would call this customer downstairs for inappropriate hugs that involved touching her buttocks and breasts in a rubbing manner. The hugs were inappropriately long and included moaning sounds from Defendant Siggers.

55. Defendant Siggers made clear to this customer that he wanted her sexually in exchange for the free services.

56. In 2024, Ms. Dhondt reported to Siggers' manager Sonya that Mr. Siggers was touching her inappropriately and offering her money for sexual acts.

57. Sonya failed to take any meaningful corrective action, only suggesting that Ms. Dhondt avoid going downstairs or bring someone with her.

58. Amy Siggers, Defendant John Siggers' daughter-in-law who also works at the salon, warned Ms. Dhondt about going downstairs to see Mr. Siggers.

59. Despite multiple reports of serious sexual harassment and assault, Defendants never conducted any investigation into Defendant John Siggers' conduct.

60. The hostile and abusive work environment created by Mr. Siggers made it impossible for Ms. Dhondt to continue her employment.

61. The psychological and emotional impact of Mr. Siggers' conduct on Ms. Dhondt was severe and ongoing, causing her significant distress, humiliation, and trauma.

62. Despite the overwhelming evidence of Mr. Siggers' pattern of sexual harassment spanning multiple years and involving numerous victims, Defendants have failed to take any corrective action or implement policies to prevent such conduct.

63. Defendant Carol Siggers, acting as the co-owner, CFO, Secretary, and manager of the salon failed to investigate, discipline, or terminate Defendant John Siggers, demonstrating her and the business' ratification of his conduct and their deliberate indifference to the safety and welfare of their female employees and customers.

64. Defendants' conduct in maintaining Defendant John Siggers in his position with full authority over young female employees to this very day, despite actual knowledge of his predatory behavior, constitutes negligent hiring, retention, and supervision.

65. Defendants created and maintained a workplace environment that was hostile to women and tolerated, encouraged, and ratified sexual harassment and assault as a regular business practice.

COUNT I
Sexually Hostile Work Environment in Violation of Title VII
Against Defendant Siggers Hairdressers

66. Plaintiff incorporates by reference the foregoing paragraphs 1 through 65 of the Complaint as if fully stated herein.

67. Plaintiff was subjected to a sexually hostile work environment by Mr. Siggers, for which Defendant Siggers Hairdressers is vicariously liable.

68. Plaintiff was subjected to severe and pervasive sexual harassment, sexual assault, unwanted physical touching, digital penetration, forced sexual acts by Mr. Siggers, as outlined above.

69. The harassment was unwelcome, based on Plaintiff's sex, and was severe and pervasive.

70. Plaintiff reported the sexually hostile work environment to manager Sonya, and it was also reported to Carol Siggers, a co-owner of the salon.

71. Defendants already knew about Defendant John Siggers' propensity for engaging in sexual harassment and assault of female employees but did nothing to stop it.

72. At all times relevant to this action, Defendants knew or should have known of Defendant John Siggers' sexual harassment and assault of Plaintiff and the existence of a sexually hostile work environment, but failed to take any remedial or corrective action to prevent or correct the harassment or protect Plaintiff.

73. Defendants failed to exercise reasonable care to prevent and promptly correct the harassing behavior, which they were aware of, and so are both directly and vicariously liable for a sex-based hostile work environment.

74. Defendants willfully and wantonly disregarded Plaintiff's rights and their discrimination against Plaintiff was undertaken in bad faith.

75. As a result of Defendants' unlawful actions, Plaintiff has suffered severe emotional distress, physical harm, humiliation, loss of income, and other damages.

76. Plaintiff is entitled to recover compensatory and punitive damages, and reasonable attorney's fees and costs for this Title VII violation from Defendants.

COUNT II

Assault

Against Defendants John Siggers, Carol Siggers and Siggers Hairdressers

77. Plaintiff incorporates by reference the foregoing paragraphs 1 through 65 of the Complaint as if fully stated herein.

78. Defendant John Siggers' actions against Plaintiff as described above placed Plaintiff in reasonable apprehension of imminent and unlawful physical contact, thus constituting assault under Georgia law.

79. Defendant Siggers' demands that she submit to sexual acts, his exposing of his genitals, and his aggressive behavior when she refused his advances created reasonable apprehension of immediate harmful and offensive contact, rendering him liable to Plaintiff for damages from his repeated assaults.

80. At all relevant times, Defendant John Siggers was acting in the course and scope of his ownership of Defendant Siggers Hairdressers, and with actual and apparent authority, making his co-owner Carol Siggers and the hair salon business vicariously liable for the assault by the individual defendant under a theory of respondeat superior.

81. Based on Defendant Carol Siggers' actual and constructive knowledge of Defendant John Siggers' misconduct, and his history and propensity for the same, coupled with

her failure to intercede and decisions to retain him after multiple victims came forward to report his tortious acts, Defendant Carol Siggers condoned, adopted, and ratified Siggers' conduct, making her and Siggers Hairdressers liable for his assault of Plaintiff.

82. As a result of Defendants' unlawful actions, Plaintiff has suffered severe emotional distress, physical harm, humiliation, and other damages, and Defendants are jointly and severably liable for all such damages.

COUNT III

Battery

Against Defendants John Siggers, Carol Siggers and Siggers Hairdressers

83. Plaintiff incorporates by reference the foregoing paragraphs 1 through 65 of the Complaint as if fully stated herein.

84. Defendant John Siggers' actions against Plaintiff described above amounted to the unwanted and offensive touching of Plaintiff's intimate body parts, including digital penetration, touching of her breasts and butt, putting his hands up her shirt and down her pants, and forcing her to perform sexual acts, and constitute battery under Georgia law.

85. These physical contacts were intentional, harmful, offensive, and without Plaintiff's consent.

86. At all relevant times, Defendant John Siggers was acting with actual and apparent authority and in the course and scope of his ownership and operation of Defendant Siggers Hairdressers, making it vicariously liable for the actions of Siggers under a theory of respondeat superior.

87. Based on Defendant Carol Siggers' actual and constructive knowledge of Defendant John Siggers' misconduct, and his history and propensity for the same, coupled with her failure to intercede and decisions to retain him after multiple victims came forward to report

his tortious acts, Defendant Carol Siggers condoned, adopted, and ratified Siggers' conduct, making her and Siggers Hairdressers liable for his battery of Plaintiff.

88. As a result of Defendants' unlawful actions, Plaintiff has suffered severe emotional distress, physical harm, humiliation, and other damages, and Defendants are jointly and severably liable for all such damages

COUNT IV
Intentional Infliction of Emotional Distress
Against Defendants John Siggers, Carol Siggers and Siggers Hairdressers

89. Plaintiff incorporates by reference the foregoing paragraphs 1 through 65 of the Complaint as if fully stated herein.

90. Defendant John Siggers intentionally, maliciously, wantonly, and in gross and reckless disregard for Plaintiff's health and safety, engaged in extreme and outrageous conduct when he subjected Plaintiff to sexual harassment and sexual assault over approximately two years.

91. Defendant Siggers' conduct was particularly heinous as he deliberately exploited Plaintiff's financial desperation as a single mother, using her need to pay for her child's daycare and basic necessities to coerce her into sexual acts.

92. Defendant Siggers' exploitation of Plaintiff's grief and vulnerability after her child's father died demonstrates the extreme and outrageous nature of his conduct.

93. The conduct included digital penetration, forced sexual acts, unwanted touching of intimate body parts, exposure of genitals, financial coercion, and threats, which exceeded all possible bounds of decency in a civilized community.

94. Defendant Siggers' conduct was intended to cause, and did cause, Plaintiff to suffer severe emotional distress.

95. At all relevant times, Defendant John Siggers was acting in the course and scope of his ownership and operation of Defendant Siggers Hairdressers, making it vicariously liable for the actions of Siggers under a theory of respondeat superior.

96. Defendants willfully and wantonly disregarded Plaintiff's rights and their conduct was undertaken in bad faith.

97. Based on Defendant Carol Siggers' actual and constructive knowledge of Defendant John Siggers' misconduct, and his history and propensity for the same, coupled with her failure to intercede and decisions to retain him after multiple victims came forward to report his tortious acts, Defendant Carol Siggers condoned, adopted, and ratified Siggers' conduct, making her and Siggers Hairdressers liable for his actions.

98. Defendants' conduct was objectively malicious, wanton, and wholly incompatible with the standards of society.

99. As a result of Defendants' unlawful actions, Plaintiff has suffered severe emotional distress, physical harm, humiliation, and other damages, rendering Defendants jointly and severably liable to Plaintiff for all such damages.

COUNT V

Negligent Hiring, Retention, and Supervision

Against Defendants John Siggers, Carol Siggers and Siggers Hairdressers

100. Plaintiff incorporates the foregoing paragraphs 1 through 65 of the Complaint by reference as if fully stated herein.

101. Siggers Hairdressers and Carol Siggers were aware of Defendant John Siggers' sexual harassment, assault, and battery of female employees and customers by virtue of multiple reports, complaints, and police reports, thus making both Carol Siggers and Siggers Hairdressers

aware of his propensity and tendencies to subject women like Plaintiff to sexual assault and harassment.

102. Throughout Plaintiff's employment, Defendant John Siggers regularly and repeatedly subjected Plaintiff to sexual assault and sexual harassment, including the same type of conduct he had previously subjected other female employees and customers to.

103. Sebastian Esteves reported directly to Carol Siggers that Defendant John Siggers was giving employees money in exchange for sexual acts.

104. Manager Sonya was also informed by Plaintiff that Defendant John Siggers was touching her inappropriately and offering money for sexual acts.

105. Yet, Defendant Siggers Hairdressers and Carol Siggers negligently took no steps to correct the sexually hostile work environment that existed prior to or during Plaintiff's employment, and took no action to stop Defendant John Siggers from victimizing other women, including Plaintiff, either before she was hired or after it was reported.

106. Instead, Defendants Carol Siggers and Siggers Hairdressers negligently continued to employ and retain Defendant John Siggers in a position of authority over young female employees when it actually knew, constructively knew, or in the exercise of reasonable care should have known, of his prior history of, reputation, and propensity for, sexual harassment and assault directed toward female employees.

107. Notwithstanding actual and constructive knowledge of Defendant John Siggers' prior history of, reputation, and propensity for, sexual harassment and assault, Defendants negligently supervised Siggers, failed to intercede on Plaintiff's behalf, and negligently retained Siggers, thereby ratifying, condoning, and adopting his conduct.

108. Defendants are also liable because John Siggers acted with actual and apparent authority and agency.

109. As a direct and proximate result of Defendants' negligent hiring, retention, and supervision, Plaintiff suffered severe damages including sexual assault, harassment, emotional distress, and economic harm, rendering Defendants jointly and severably liable for all such damages.

COUNT VI
Premises Liability
Against Defendants Siggers Holdings and Siggers Hairdressers

110. Plaintiff hereby incorporates and alleges paragraphs 1 through 65 below as if fully set forth herein.

111. Siggers Hairdressers was regularly open to the public for employees and customers and held itself out as an established business in a building owned and maintained by Siggers Holdings.

112. Georgia law requires that all business owners and occupiers, such as Defendant Siggers Holdings here, take reasonable steps to insure that the approaches to and property of any business open to the public be free of unreasonable risk of harm or injury.

113. Defendant John and Carol Siggers at all times relevant hereto acted with actual and apparent authority as agents of Defendant Siggers Holdings and Siggers Hairdressers.

114. Defendants John and Carol Siggers had actual and constructive knowledge of the outrageous tortious and criminal behavior of John Siggers carried out upon employees and customers for years, and as such, their knowledge is imputed to Defendants Siggers Hairdressers and Siggers Holdings. Defendants Siggers Hairdressers and Siggers Holdings, despite having actual and constructive knowledge of dangerous conditions in the building they owned and

maintained and opened to the public, they negligently took no steps to warn the public about these dangers.

115. As a result, Defendant Siggers Hairdressers and Siggers Holdings maintained a business premises open to the public which was inherently unsafe and carried a substantial risk of harm to any business invitee entering the premises. All affected customers and employees were business invitees, including Plaintiff here. As a direct and proximate result of Defendants Siggers Holdings and Siggers Hairdressers' negligent decision not to warn the public of the dangers of their public property and their negligent failure to correct the dangers in their property which they maintained as open to the public, Plaintiff sustained serious emotional and physical damages.

116. Accordingly, Defendants Siggers Holdings and Siggers Hairdressers are liable to Plaintiff for damages under the theory of premises liability for their negligence in failing to keep the premises of Siggers Hairdressers safe.

COUNT VII
Punitive Damages under O.C.G.A. § 51-12-5.1
Against All Defendants

117. Plaintiff incorporates the foregoing paragraphs 1 through 65 of the Complaint by reference as if fully stated herein.

118. All of Defendants' unlawful conduct set forth herein was intentional, willful, malicious, and conducted with the specific intent to harm Plaintiff and with conscious indifference to the consequences.

119. Defendants' conduct showed a complete indifference to or conscious disregard for the safety of Plaintiff and other female employees and customers.

120. Punitive damages are appropriate to punish Defendants for their outrageous conduct and to deter similar conduct in the future.

COUNT VII
Attorneys' Fees and Costs under O.C.G.A. § 13-6-11
Against All Defendants

121. Plaintiff incorporates the foregoing paragraphs 1 through 65 of the Complaint by reference as if fully stated herein.

122. By their actions described above, Defendants acted in bad faith, were stubbornly litigious, and/or put Plaintiff to unnecessary trouble and expense.

123. Under Georgia law, all intentional torts include bad faith, sufficient to justify an award of attorneys fees. Thus, under O.C.G.A. § 13-6-11, Plaintiff is entitled to recover her reasonable attorney's fees and costs incurred in prosecuting this action.

WHEREFORE, Plaintiff demands a TRIAL BY JURY and respectfully requests that this Court:

- a. Enter a declaratory judgment that Defendant Siggers Hair Salon engaged in unlawful employment practices in violation of Title VII of the Civil Rights Act of 1964;
- b. Award lost wages and front pay;
- c. Award compensatory damages, in an amount to be determined by the enlightened conscience of the jury, for Plaintiff's emotional distress, suffering, inconvenience, mental anguish, loss of enjoyment of life, humiliation, lost wages, and other special damages;
- d. Award punitive damages in an amount to be determined by the enlightened conscience of the jury sufficient to punish Defendants for their outrageous conduct toward Plaintiff and to deter Defendants and others from similar conduct in the future;

- e. Award Plaintiff her reasonable attorneys' fees and costs pursuant to Title VII, 42 U.S.C. § 1988, and O.C.G.A. § 13-6-11;
- f. Award pre-judgment and post-judgment interest as provided by law;
- g. Grant such other injunctive relief as may be necessary to ensure that Defendants do not engage in similar unlawful conduct in the future; and
- h. Grant such other and further relief as this Court deems just and proper.

By: /s/ Rachel Berlin Benjamin
Rachel Berlin Benjamin
Georgia Bar No. 707419
rachel@beal.law
Andrew M. Beal
Georgia Bar No. 043842
drew@beal.law
BEAL SUTHERLAND
BERLIN & BROWN
2200 Century Parkway, Suite 100
Atlanta, GA 30345