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**IN THE COURT OF COMMON PLEAS  
 CUYAHOGA COUNTY, OHIO**

GREG KOCHIS )  
 10700 LAKE AVENUE )  
 CLEVELAND, OHIO 44102 )

Plaintiff, )

vs. )

TGC, INC. (D.B.A. GOLF CHANNEL) )  
 7580 COMMERCE DRIVE )  
 ORLANDO, FLORIDA 32819 )

and, )

NEP BROADCASTING, LLC )  
 2 BETA DRIVE )  
 PITTSBURGH, PENNSYLVANIA 15238 )

and, )

JOHN DOE )  
 ADDRESS UNKNOWN )

and, )

JANE DOE )  
 ADDRESS UNKNOWN )

Defendants. )

Complaint  
 CASE BRIAN J CORRIGAN  
 CV 10 717473

JUDGE

**COMPLAINT (WITH JURY  
 DEMAND ENDORSED HEREIN)**

**AND**

**FIRST SET OF COMBINED  
 INTERROGATORIES, REQUEST FOR  
 ADMISSIONS AND REQUEST FOR  
 PRODUCTION OF DOCUMENTS  
 ATTACHED**

Now comes the Plaintiff, Greg Kochis, by and through undersigned counsel and hereby states the following:

## **PRELIMINARY STATEMENT**

1. Plaintiff Greg Kochis worked as a camera video person (hereinafter referred to as a videographer) at hundreds of sporting events, including Golf events, for Defendants throughout the United States. After reporting work place drug use by his co-workers, Defendants began to engage in a pattern and practice of unlawful violations of Ohio Revised Code §4101 et seq. and the principals of common law and public policy of the State of Ohio, including retaliatory wrongful termination of employment, contrary to Ohio Public Policy and Ohio's Whistle Blowers Protection Act.

### **COUNT ONE**

#### **VIOLATION OF OHIO'S 'WHISTLEBLOWERS PROTECTION ACT'**

2. Plaintiff Kochis is a free lance videographer who resides in the city of Cleveland, County of Cuyahoga, State of Ohio.
3. Beginning approximately 2000, Plaintiff Kochis began to work as a videographer for Defendants at different golf events and shows throughout the United States. At all times relevant herein as set out below, Plaintiff Kochis worked for Defendants.
4. Defendants TGC, Inc., hereinafter referred to as 'Golf Channel', and NEP Broadcasting LLC, hereinafter referred to as 'NEP', are in the business of golf television production throughout the United States and in and around Cuyahoga County, State of Ohio.
5. In April and May of 2007, Plaintiff Kochis informed a Production Manager of Defendants that some of his co-workers were using illegal drugs and smoking marijuana on the golf courses during the taping and production of live golf events.

6. In May 2007, during a Golf Show in Chicago, Plaintiff Kochis reported to a Tech Manager of Defendants that two of his co-workers were smoking marijuana at work.
7. The Tech Manager agreed with Plaintiff Kochis that he has a right to work in a drug free workplace and that he will talk to Kochis' co-workers.
8. Soon after reporting the incident in Chicago, several of Plaintiff Kochis' co-workers began to harass him by confronting him, arguing with him, refusing to car pool with him, refusing to share hotel rooms with him and writing messages such a "Kochis is a Rat" and "Kochis sucks Dick" in and around the workplace.
9. Around June 2007, Plaintiff met with Defendant NEP's Department Head in charge of organizing the work crew for each event and requested her help in resolving the continued workplace drug use and on-going harassment.
10. Plaintiff Kochis further informed her that as a videographer taping live golf events, his work suffers when the people who are assisting him in the television golf production are under the influence of openly smoking 'pot' on the golf course.
11. As a result of the meeting, Plaintiff Kochis was requested to provide names of his co-workers that were harassing him and/or smoking marijuana at the work site, which he did.
12. In July 2007, during the taping of a Golf Channel show in New York, the work place harassment and drug use continued.
13. Thereafter, Plaintiff was informed by Defendant NEP that Defendant Golf Channel fired Plaintiff Kochis from working on any golf channel shows that were conducted under the direction of a named Golf Channel director.

14. In September 2007, while working at a golf event in Salt Lake City, Utah, Plaintiff Kochis' co-workers purposely left him at a hotel, causing Plaintiff Kochis to find his own way to the golf event.
15. While at the golf event, a few of Plaintiff Kochis' co-workers began to harass, argue, shove and push Plaintiff Kochis.
16. Following this incident, Plaintiff Kochis contacted a Director for Defendant Golf Channel and the Crew Department Head for Defendant NEP and 'begged' for their help in resolving the ongoing harassment and work place drug use.
17. Defendants stated to Plaintiff Kochis that they would talk to his co-workers and handle the situation.
18. During the remainder of 2007 and early 2008, Plaintiff Kochis' work for Defendants is very limited and the Crew Department Head for Defendant NEP is fired and replaced by another individual.
19. Plaintiff Kochis informed the new Crew Department Head for Defendant NEP about the on-going harassment and drug use in the work place, wherein he was informed that 'last year is over' and that he was not being harassed any more by his co-workers.
20. In February 2008, Plaintiff Kochis informed Defendants that while working at a golf event for Defendants in Puerto Rico, he was again subjected to harassment and drug use in the workplace.
21. During the last week in May 2008, Plaintiff Kochis worked for Defendants at a golf tournament in Columbus, Ohio.
22. On or about June 1, 2008, Plaintiff Kochis' time sheet for the Columbus golf tournament was altered when transferred to his time card.

23. Thereafter, Plaintiff Kochis noticing the alteration, contacted Defendants to discuss the discrepancy in his work hours.
24. On June 2, 2008, Defendants, having completely failed to address the on-going work place harassment and illegal use of drugs in the work place, fired Plaintiff Kochis using the time card alteration complaint as a pretext for his termination.
25. Defendants wilful, purposeful and malicious actions and inactions violated Plaintiff Kochis' rights under Ohio's 'Whistleblowers Protection Act', as set out in Ohio Revised Code §4113. 01 et seq.
26. As a direct result of Defendants' willful, purposeful and malicious actions and inactions, Plaintiff Kochis suffered and continues to suffer loss income, wages and work benefits.

### **COUNT TWO**

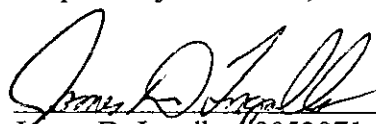
#### **WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY**

27. Plaintiff Kochis incorporates each and every allegation in the preceding paragraphs as if fully re-written herein.
28. As a direct consequence and result of Defendants having completely failed to address the on-going use of illegal drugs in the workplace, Defendants violated Ohio's public policy entitling Plaintiff Kochis to a safe, drug free work environment, as set out, but not exclusively, under the Ohio Constitution, the Ohio Administrative Code; and, the Ohio Revised Code §3719 et seq. (controlled substance prohibition), §3794 et seq. (smoking ban) and §4101 et seq. (safe work environment).
29. As a direct result of Defendants' willful, purposeful and malicious actions in wrongfully discharging Plaintiff Kochis, Plaintiff Kochis suffered and continues to suffer loss income, wages and work benefits.

**WHEREFORE**, Plaintiff Kochis prays for the following relief:

1. Compensatory damages against Defendants, jointly and severally, in an amount in excess of One Hundred Thousand (\$100,000) Dollars, for their wilful, purposeful and malicious actions and inactions which violated Plaintiff Kochis' rights set out under Ohio's 'Whistleblowers Protection Act.'
2. Punitive damages against Defendants, jointly and severely, in an amount of at least three (3) times the award of compensatory damages for Defendants' willful, malicious and/or reckless disregard for Plaintiff Kochis' health, safety and welfare.
3. Compensatory damages against Defendants, jointly and severely, in an amount in excess of One Hundred Thousand (\$100,000) Dollars for Defendants wrongful termination of Plaintiff Kochis and for their complete failure to address the on-going use of illegal drugs in the workplace, whereby violating Ohio's public policy entitling Plaintiff Kochis to a safe, drug free work environment.
4. Punitive damages against Defendants, jointly and severely, in an amount of at least three (3) times the award of compensatory damages for Defendants' willful, malicious and/or reckless disregard for Ohio's public policy entitling Plaintiff Kochis to a safe, drug free work environment.
5. Prejudgment interest, post-judgment interest, costs, fees, and expenses and for such other relief which may be deemed just and equitable by the court.

Respectfully Submitted,



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