

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JAN 19 2024

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION**

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

JESSICA LANGSTON,

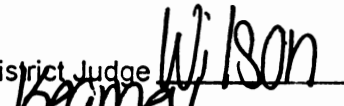

Plaintiff,

vs.

COGGINS RENTAL, LLC and DENNIS
COGGINS,

Defendants.

Case No. 3:24-cv-00006-BRW

This case assigned to District Judge 
and to Magistrate Judge 

COMPLAINT AND DEMAND FOR JURY TRIAL

Introduction

1. This is a housing harassment case. Dennis Coggins, the mayor of Hoxie, owns residential rental properties, many of them through Coggins Rental, LLC. Coggins rented a home to Jessica Langston and then sexually harassed her. Langston now sues to recover for her injuries.

Jurisdiction & Venue

2. This court has subject-matter jurisdiction over this case under 28 U.S.C. § 1331 because of Langston's federal Fair Housing Act claim.

3. This court has subject-matter jurisdiction over Langston's remaining claims under 28 U.S.C. § 1367 because they arise from the same facts as her federal claim.

4. Venue is proper in this judicial district because the relevant events occurred in Lawrence County and the individual parties reside in Lawrence County.

Parties

5. Plaintiff Jessica Langston is a person living in Lawrence County, Arkansas.

6. Defendant Coggins Rental, LLC is an Arkansas limited liability company.

7. Defendant Dennis Coggins is a person living in Lawrence County, Arkansas.

Allegations

8. Jessica Langston worked at a donut shop that Dennis Coggins, then the mayor of Hoxie, frequented.

9. At the time, Ms. Langston was trying to leave an abusive relationship, but she needed to find a place to live to do so.

10. One morning at the donut shop, Ms. Langston confided in Mr. Coggins about her situation.

11. Knowing he was a landlord, she hoped he could help her find a safe place to live with her young son.

12. Mr. Coggins called Ms. Langston the same night and asked her to meet him at an unfinished property under the guise of eventually renting it to her.

13. When Ms. Langston arrived at the property, however, Mr. Coggins forced her into a long hug.

14. Ms. Langston was more than uncomfortable, she was stunned.

15. Mr. Coggins made comments about how he wanted to have sex with her.

16. Ms. Langston told him that she would not have sex with him and left without securing the rental unit.

17. Ms. Langston did not reach back out to Mr. Coggins until she was approved for a HUD housing voucher.

18. Unable to find anything to rent with the voucher from other landlords, Ms. Langston contacted Mr. Coggins.

19. He invited her to an available rental unit, and again forced her into a long hug and offered to have sex with her.

20. She declined his offer for sex, but, desperate to leave her abusive relationship, she accepted the rental unit and moved in with her son.

21. The rental unit, located in Hoxie, was owned by Coggins Rental, LLC.

22. Now her landlord, Mr. Coggins continued to harasser Ms. Langston.

23. Mr. Coggins repeatedly forced Ms. Langston into long, unwanted hugs.

24. During one of those hugs shortly after she moved into the apartment, Mr. Coggins grabbed Ms. Langston's butt.

25. And in almost every in person or telephone interaction they had, Mr. Coggins asked Ms. Langston to have sex with him in exchange for her rent and utility bills.

26. For example, Mr. Coggins told Ms. Langston he would pay her bills and take care of her and her son if she agreed to "meet [his] needs."

27. Ms. Langston understood that by "meet his needs," Mr. Coggins meant sex.

28. Mr. Coggins persistently requested sex over the next several months.

29. Scared that Mr. Coggins, who as the mayor of Hoxie yields significant power, would retaliate against her, Ms. Langston always let Mr. Coggins down gently, telling him that she respected herself and her values and did not feel comfortable engaging in a commercial, sexual relationship.

30. In addition to asking for sex, Mr. Coggins came over to Ms. Langston's apartment unannounced and called her unexpectedly, often as she was getting into or out of the shower.

31. These interactions scared Ms. Langston—she felt like Mr. Coggins was watching her.

32. Ms. Langston changed her locks, and occasionally had a friend stay over in case Mr. Coggins showed up.

33. Mr. Coggins also leveraged Ms. Langston's young son, saying things like: "You don't want your son to go without," and, "You want Christmas and birthday money for your son."

34. One time, Mr. Coggins showed up to Ms. Langston's house unannounced with \$100 in cash.

35. In exchange for the \$100, he wanted sex. Mr. Coggins commented that he could park around the back of the house so nobody would know he was there.

36. He also specifically told Ms. Langston he wanted sexual favors and not explicit photographs because "that's how you get in trouble."

37. After about six months of almost daily requests from Mr. Coggins for sex, Ms. Langston could not take it anymore.

38. Mr. Coggins told her that he would do whatever it took for her to agree to have sex with him.

39. This time Ms. Langston firmly stood her ground: She refused and told him that nobody had ever talked to or treated her like a sex worker before. She demanded he stop.

40. After that conversation, Mr. Coggins turned on Ms. Langston.

41. When she had to contact Mr. Coggins about any issues with her apartment, for instance, he refused to speak with or help her.

42. At one point, Mr. Coggins had her water shut off.

43. In response, Ms. Langston told him if he did not turn it back on, she would release audio recordings of him asking her for sex in exchange for money.

44. Mr. Coggins responded, "Do whatever you want with that shit."

45. But, shortly, her water was on.

46. Finally, Mr. Coggins began to speak ill of Ms. Langston to her neighbors and around town.

47. A neighbor informed Ms. Langston that Mr. Coggins wanted to get her out of the apartment.

48. Mr. Coggins's sexual harassment and retaliation after she stood her ground has caused Ms. Langston mental and emotional distress giving rise to related bodily injury all of which continues to this day.

Claims for Relief

Count 1 – Fair Housing Act

Against All Defendants

49. Langston incorporates all other allegations here.

50. Defendants injured Langston by committing discriminatory housing practices in violation of the federal Fair Housing Act, including:

- a. Quid pro quo sexual harassment in violation of 42 U.S.C. § 3604(b), § 3604(c), and 24 C.F.R. § 100.600(a)(1);
- b. Hostile environment harassment based on sex in violation of 42 U.S.C. § 3604(b), § 3604(c), and 24 C.F.R. § 100.600(a)(2);
- c. Retaliation based on Langston's refusal to give in to sexual harassment in violation of 42 U.S.C. § 3604(b), § 3617, 24 C.F.R. § 100.65(b); and §100.400(c)(5); and
- d. Making discriminatory statements in violation of 42 U.S.C. § 3604(c).

51. Langston is therefore entitled to compensatory damages, punitive damages, declaratory relief, attorneys' fees and costs.

52. Each Defendant is directly liable, vicariously liable, or liable based on state partnership law for these discriminatory housing practices.

Count 2 – Negligence

Against Coggins Rental, LLC

53. Langston incorporates all other allegations here.

54. Coggins Rental owed Langston a duty to train, supervise, and discipline the Coggins so as to prevent Coggins from sexually harassing Langston.

55. Coggins Rental breached those duties, causing Coggins' harassment of Langston.

56. Those breaches therefore injured Langston.

57. Langston is therefore entitled to compensatory and punitive damages.

Count 3 – Assault

Against All Defendants

58. Langston incorporates all other allegations here.

59. Coggins put Langston in imminent fear of an offensive, unreasonable, unconsented, and unpermitted touching.

60. Each Defendant is directly liable, vicariously liable, or liable based on state partnership law for that conduct.

61. That conduct injured Langston.

62. Langston is therefore entitled to compensatory and punitive damages.

Count 4 – Battery

Against All Defendants

63. Langston incorporates all other allegations here.

64. Coggins battered Langston by making offensive and harmful contact with her, he intended to do so, and she did not consent nor was the contact permitted.

65. Each Defendant is directly liable, vicariously liable, or liable based on state partnership law for that conduct.

66. That conduct injured Langston.

67. Langston is therefore entitled to compensatory and punitive damages.

Count 5 – Trespass

Against All Defendants

68. Langston incorporates all other allegations here.

69. Coggins entered Langston's home and grounds without lawful authority, good cause, or consent.

70. Each Defendant is directly liable, vicariously liable, or liable based on state partnership law for that conduct.

71. That conduct injured Langston.

72. Langston is therefore entitled to compensatory and punitive damages.

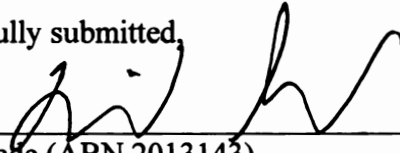
Prayer for Relief

73. Ms. Langston prays for a judgment with the following relief:

- a. Compensatory damages,
- b. Punitive damages,
- c. Attorneys' fees and costs,
- d. Pre- and post- judgment interest,
- e. Declaratory relief, and
- f. All other relief that the court finds just.

Dated: January 19, 2024

Respectfully submitted,



David Slade (ABN 2013143)

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Attorneys for Plaintiff

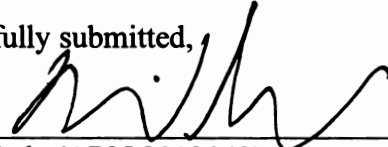
*Application for admission pending

Demand for Jury Trial

Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a jury trial on all issues.

Dated: January 19, 2024

Respectfully submitted,



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Attorneys for Plaintiff

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JS 44 (Rev. 04/21)

CIVIL COVER SHEET

3:24-cv-00006-BRW

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS</p> <p style="text-align: center;">JESSICA LANGSTON</p> <p>(b) County of Residence of First Listed Plaintiff <u>Lawrence</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> wh LAW 1 Riverfront Pl, Ste 745, North Little Rock, AR 72114 501-891-6000</p>	<p>DEFENDANTS</p> <p>COGGINS RENTAL, LLC and DENNIS COGGINS</p> <p>County of Residence of First Listed Defendant <u>Lawrence</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p>
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<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT *(Place an "X" in One Box Only)* Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
<p>REAL PROPERTY</p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>CIVIL RIGHTS</p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input checked="" type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty	<p>LABOR</p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*
42 USC 3601

Brief description of cause:
Housing discrimination based on sex

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** _____ CHECK YES only if demanded in complaint: **JURY DEMAND:** Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE: Jan 19, 2024 SIGNATURE OF ATTORNEY OF RECORD: 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____