

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

PATRICIA C. WHEELER

Plaintiff,

AT LAW NO.: 03989-PT

v.

EQUIDATA, INC.,

Defendant.

**SERVE: Bennet L. Stein
740-F Thimble Shoals Blvd.
Newport News, VA 23606**

COMPLAINT

NOW COMES the Plaintiff, Patricia C. Wheeler, by counsel, and complains against Equidata, Inc. on the grounds and in the amount set forth below:

1. On or about July 27, 2007, Hampton University offered Wheeler a position of Acquisitions Assistant in the Harvey Library. On or about August 15, 2007, Wheeler authorized Hampton University to conduct a background check.

2. Hampton University hired Equidata to conduct the background check. On or about August 22, 2007, Equidata produced a report to Hampton University purporting to reflect Wheeler's criminal history. The report claims that Wheeler was "convicted" of the "offenses" of "trespass" and "assault by threat."

3. Wheeler has never been convicted of these crimes.

4. As a result of the false information given to Hampton University, Hampton University withdrew its offer of employment to Wheeler.

COUNT 1
DEFAMATION

5. Equidata published to a prospective employer, Hampton University, false and disparaging remarks against Wheeler's character, imputing the commission of crimes.

COUNT 2
TORTIOUS INTERFERENCE WITH A CONTRACT EXPECTANCY

6. Wheeler was offered a position with Hampton University. Hampton University withdrew its offer of employment following Equidata's false, malicious, and negligent statements to Hampton University.

7. Equidata knew or should have know that there either was a contract expectancy or a reasonable probability that there would be a contract expectancy between Wheeler and Hampton University, and that there was a reasonable probability of future economic benefit to Wheeler from the employment contract expectancy.

8. Equidata intentionally used improper methods, including the reckless, malicious, or negligent publishing of false and defaming statements against Wheeler, to interfere with the employment contract expectancy. Wheeler was removed from candidacy because of Equidata's defamatory statements, and thereby harmed by the disruption of the employment contract expectancy.

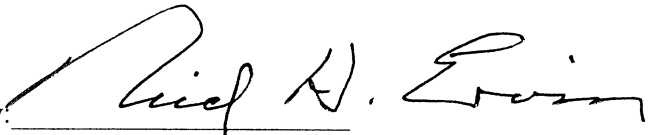
9. Equidata's false, malicious, unlawful, unprivileged statements, exposed Wheeler to public hatred, contempt, and ridicule, and injured her in her occupational pursuits. Wheeler has been caused to suffer damage to her good name and character, humiliation, embarrassment, vilification, exposure to public infamy, disgrace, injury to her reputation and feelings, loss of employment and other financial loss, both past and

future, and has been hampered in the conduct of her business and personal affairs, much of which will permanently injure her.

THEREFORE, Plaintiff, Patricia C. Wheeler, requests that this Court enter judgment in her favor and against the Defendant, Equidata, Inc., in the amount of \$1,000,000, representing \$500,000 in compensatory damages and \$500,000 in punitive damages, and her costs expended in this action.

PLAINTIFF DEMANDS A TRIAL BY JURY.

PATRICIA C. WHEELER

By: 
Of Counsel

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