

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA CIVIL  
DIVISION**

**Brooke Radford,**

**Plaintiff,**

**v.**

**BAKER & MCKENZIE LLP and  
MAURICE BELLAN,**

**Defendants.**

**Case No.**

**COMPLAINT**

Plaintiff Brooke Radford brings this action for damages against Defendants Baker & McKenzie LLP (“Firm”) and Defendant Maurice Albert Bellan (“Bellan”) and states as follows:

**NATURE OF THE ACTION**

1. Plaintiff is a form Firm associate. She was sexually harassed and assaulted by the Managing Partner of Baker McKenzie LLP.

**PARTIES**

2. Plaintiff was a resident of Maryland. Plaintiff is a woman of color and a member of a protected class pursuant to DC Human Rights Act of 1997 (“DCHRA”).

3. Defendant Baker McKenzie LLP is a limited liability partnership with an office at 815 Connecticut Ave, Washington DC, 20006. The Firm is one of the largest law firms in the world, with approximately 5,000 attorneys.

4. Defendant Maurice Bellan is an individual with residing in Fulton, Maryland. He is the current DC Managing Partner of the Firm.

**JURISDICTION, VENUE, AND CONIDITIONS PRECEDENT**

5. This Court has jurisdiction over this action pursuant to D.C. Code § 11-921.

6. Jurisdiction of this court is lawful and proper because Defendants conduct business in D.C., and the events complained of herein arose or occurred in D.C.

### **FACTUAL ALLEGATIONS**

#### **I. Bellan Utilizes His Role as Managing Partner to Control Radford's Career at the Firm.**

7. Radford met Bellan at a Baker Mckenzie 1L reception hosted at Baker's D.C. office in 2020, when Radford was 24.

8. Radford joined Baker as a summer associate in 2021 in the tax practice group.

9. For their first lunch, Bellan took Radford to the Bombay Club, one-on-one, and questioned her about her personal family life.

10. Radford explained her upbringing with a single mother, to which Bellan responded, "Tell your mom I got you."

11. Given Bellan's position as Managing Partner, Radford assumed this meant he would assist her in her career.

12. Bellan would soon begin to report to Radford that certain partners did not like her. He insisted she depend on him and only network with the people he introduced her to.

13. Even after Radford's positive performance review from her tax practice group in 2023, Bellan followed up by telling her that the performance review is likely inaccurate because the partners are "withholding criticism."

14. Bellan soon began making inappropriate comments, stating that she reminded him of his wife and asking about her dating life.

**II. Bellan Stated he had a “Plan” for Radford and Began to Coordinate Interactions Between Reece and Radford.**

15. At work, Bellan began insisting that Radford and his son (“Reece”) should meet.

16. Radford was still studying for the bar, so she did not entertain the idea at the time.

17. Once Radford passed the bar, Bellan called her using the Teams application on his work computer.

18. Bellan first asked Radford if she was in the office. Radford assured him that she was.

19. Bellan informed her that he invited his son to come to the D.C. office, and he wanted them to meet.

20. Bellan asked Radford not to inform Reece that he wanted to introduce the two of them.

21. Then Bellan had his secretary email Radford to inform her that Reece was at the office and to come to Bellan’s office immediately.

22. When Radford arrived at Bellan’s office, it was Bellan, his wife, and Reece, present.

23. Bellan then asked if Radford wanted to go to dinner with his family.

24. When Radford hesitated, Bellan became visibly upset, so she agreed.

25. Bellan, his wife, Reece, and Radford had dinner at BLT, during which Bellan controlled the table conversation to topics unrelated to Radford’s work at the Firm or Reece’s interest in law school.

26. Following the dinner, Radford sent Bellan a thank you email.

27. That Sunday, Bellan emailed Radford his phone number and asked her to call him.

28. Radford called him, and Bellan told her that he was giving her phone number to his son.

29. Reece texted Radford that same day, with no discussion of law school.

30. Later, Reece informed Radford that he was being discharged from the Army before his contract was completed.

31. When Bellan found out Reece would be returning home, Bellan asked Radford if she wanted a roommate.

32. After Reece was dishonorably discharged, Bellan began calling Radford more often, stating she could only ignore his calls if she was on the phone with Reece.

33. Bellan also asked Radford what she thought about “juniors.” Radford questioned whether he was referring to the junior associates at the firm. To which he clarified, “no, naming your child after me.”

**III. Bellan Used Firm Events as an Opportunity to Sexually Assault and Harass Radford.**

34. Bellan annually hosted Juneteenth events at his home.

35. During her first year at the Firm, Bellan approached Radford and specifically asked her why she had not RSVP'd to his event.<sup>1</sup> Because of this, Radford felt an obligation to be in attendance every year.

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<sup>1</sup> Radford did not RSVP to the Juneteenth invite sent a few months prior to her wrongful termination, despite Bellan's reminders.

36. During the 2024 Juneteenth event, Radford approached Bellan in the basement of his home to say goodbye.

37. Bellan was lying on the couch, but Radford assumed he would stand up.

38. Instead of standing up, Bellan reached his arm out and pulled her down on top of him.

39. Radford, with heels and a dress, fell on top of Bellan.

40. Bellan attempted to hold Radford tightly on top of him.

41. She then pushed Bellan off of her and began to leave. Bellan did not apologize.

42. As Radford left the basement, Bellan got up and watched her, menacingly, out of the window until she left.

**IV. Bellan Gave Radford a Key to His Vegas Hotel Room and Informed her of “Sex Toys” in the Rooms.**

43. During the summer of 2024, Bellan and Radford were at a conference together in Las Vegas. Teisha Johnson (“Johnson”), Alexandra Daniels (“Daniels”) were also in attendance.

44. Bellan told Radford that he was originally staying at a different hotel but later moved his reservations to Caesar’s Palace, the same hotel as her.

45. Bellan booked a suite beside her hotel room.

46. During the first day of the conference, Bellan handed Radford a key to his hotel room, despite her insisting that she had her own room.

47. Radford refused to stay in Bellan’s suite, so another female partner took the extra bed.

48. Later, Bellan, Johnson, and Radford were swimming when Bellan oddly stated that Johnson resembled a child that Bellan and Radford could conceive together.

49. This comment confused both Radford and Johnson, who said nothing in return.

50. Later, Bellan, Johnson, and Radford were going to a pool party at the Aria hotel.

51. During the walk to the pool, Bellan told Radford that the rooms in the Aria hotel had the best sex toys.

52. Bellan also stated that he is fond of the hotel because his first love was named Aria.

53. During that pool party, Radford was swimming and Bellan was sitting on the side of the pool with their drinks.

54. Bellan switched him and Radford's drinks and when Radford asked about why he was drinking her drink, he claimed it was a "mistake."

55. Bellan then insisted it was okay and to just take his drink.

56. Johnson and Daniels saw Bellan switch Radford's drink, but they said nothing at the time.

57. Later that evening, Johnson informed Bellan that Daniels and others were concerned about his behavior with Radford.

58. Bellan found out Daniels said this and immediately began discrediting her work as a partner, making Radford believe Daniels' statement had no legitimacy.

59. Bellan also began informing Radford that Daniels did not like her and Radford should not listen to any advice from Daniels.

60. Bellan told Radford that people “misplace [his] crush on [her].”

61. After the conference was over, Bellan texted Radford regarding this issue, “Thanks for hanging out. No need to stress over the things we discussed. We are all good. Landed in Jamaica.”

**V. Radford was Told to Meet Bellan at His Room to Attend an Evening Event and Bellan was Lying in the Room without Clothes.**

62. While at the Vegas Conference, Bellan, Johnson, and Radford were to attend an evening event.

63. Radford went back to her room to get ready, as did Johnson and Bellan who were sharing the suite beside Radford’s room.

64. When Radford was done getting ready, she went to pick up Johnson and Bellan as instructed.

65. Radford and Johnson yelled loudly to ask if Bellan was ready, as his room door was wide open.

66. Bellan did not respond to either of them.

67. Johnson and Radford walked into his room to find Bellan lying on the bed without clothes. He was facing the door, with one hand holding up his head.

68. Bellan did not appear shocked or ashamed to see Johnson and Radford without being dressed.

69. Radford quickly left Bellan’s room because he clearly was not ready for the evening event.

**VI. Bellan Sexually Assaulted Radford at the Firm’s Lawyers of Color Conference in Chicago.**

70. During a Chicago conference in March, Bellan incessantly harassed Radford, to the point that she left the entire conference and returned to DC.

71. It started with Bellan taking food off a plate that Radford was eating during a networking event.

72. Radford was frustrated and decided to leave for that evening.

73. The next day, Radford was networking with some of the partners when Bellan snatched Radford away claiming to “need a hug.”

74. He then grabbed Radford tightly as she stood there with her arms limp at her side.

75. Radford felt his behavior was unbearable and uncontrollable, so she had no choice but to leave the conference.

76. When Radford attempted to book a rideshare to the airport, she was informed her Corporate Card was disabled.

77. Radford had to use her own money to leave the conference.

78. Bellan, still determined to find her, texted and called her all hours of the day and night. He also had Don Crawford and Johnson contact her about her location as well.

79. This search party continued long after the conference ended, and Radford began to feel as though she could not escape.

80. When Radford returned to D.C., she attempted to avoid Bellan, but he began requiring that she come into the office, many times calling her into his office at night.

81. Radford felt afraid, but also obligated, being that he was the Managing Partner.

**VII. Bellan Offered to Pay Radford \$50,000 for a Grandchild.**



82. During Radford and Bellan’s mentorship, Bellan stopped talking about work and started focusing on Radford having a child with Reece.

83. The next mentor meeting, at Ocean Prime, Bellan apologized for “talking under her clothes,” and assured her it would not happen again.

84. Radford told Bellan that she was not ready for children and that her and Reece were not engaged in intercourse.

85. This was an awkward conversation for Radford, so she avoided Bellan until he came to her office in November 2024, the day she went to court for a large transfer pricing case.

86. Bellan rushed to Radford’s office to inform her that he told the partners about her and Reece.

87. Bellan then went on to ask Radford about her student loans and how much she owed.

88. He stated that he could “incentivize” Radford being with Reece and he would pay her “\$50,000 for a grandchild.”

89. A month later, Bellan and Radford were at the 2024 Christmas party when she was informing him of a back injury she was suffering with.

90. He stated that “it’s like [he] owns her body [he] would get her back adjusted when [she] birthed a grandchild for [him].

91. Bellan continued this behavior throughout their mentor meetings.<sup>2</sup>

**VIII. Bellan Used his Size and Status to Intimidate, Manipulate, and Isolate Radford.**

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<sup>2</sup> Radford eventually cancelled their mentor meeting, indefinitely, just a few months prior to her wrongful termination.

92. At the D.C. office, Bellan invited Radford to spend Thanksgiving with his family in South Carolina.

93. Radford agreed at the time but later called Bellan to inform him that she would be spending Thanksgiving with her mother instead.

94. Bellan became upset on the phone and demanded to know how often she visited her mother and how often she planned on doing so in the future.

95. Radford felt guilty about going to spend the holidays with her family.

96. A few months later, Reece, Radford, and Soliel Bellan (“Soliel”) planned to go out during New Year’s to celebrate the start of 2025.

97. Before leaving, Bellan asked Radford whether she wanted to stay at the house with him instead.

98. She declined and left with Reece and Soliel.

99. They met up with Soliel’s friends, one of which had a foreign name.

100. Radford overheard Soliel and Reece making fun of the girl’s foreign name.

101. Radford and Reece began to argue.

102. Radford could not call an Uber to pick her up from Bellan’s house late at night, so she stayed until she was able to drive home in the morning.

103. The next morning, Radford left without saying bye to Bellan, afraid of the consequences from the argument with his son last night, so Bellan texted her to look for her.

104. The next day, when Reece and Radford were discussing the argument, Radford was still upset and Reece stated, “the Bellan family thought it was funny,” to intimidate Radford into agreeing.

105. At some point, Reece and Radford were in the basement of Bellan's house when the rest of Bellan's family joined them.

106. Reece, Soliel, and Radford all told Bellan they had to leave by 10 pm, but Bellan insisted that they stay and play spades. Radford, being the odd one out, was forced to just observe.

107. The energy at the table became extremely tense, so Radford began to discuss the Firm's Christmas party.

108. As she was discussing the attorney's and their spouses who were in attendance, Bellan's wife stated that Bellan told her, "Spouses were not allowed at the Christmas party."

109. Radford looked at Bellan because she was not aware of such a rule.

110. Bellan was intimidatingly silent the rest of the card games, but he refused to let anyone leave the table, even after his daughter asked to leave.

111. Radford felt as though she was being punished and held hostage for the lies Bellan had told his wife.

112. Radford was fearful of seeing Bellan in the office after this event.

**IX. Radford was Wrongfully Terminated in June and Money was Stolen from Her Paycheck.**

113. In March of 2025, Bellan asked Radford to come to his office around 8 pm.

114. He began questioning her interactions with Reece.

115. Radford mustered up the courage to tell Bellan that Reece and she were not compatible romantically.

116. Bellan argued and chastised Radford about her decision. This was what Bellan typically did any time Radford tried to push back against him.

117. However, this time Radford stood her ground and stated that Reece and she should remain friends.

118. Radford hoped that this would end her ties with the Bellan family, but it did not.

119. Bellan began manipulating her work calendar. He began adding and changing meetings on her calendar and sending people to locate her.

120. When Radford asked why meetings on her calendar were being changed by him, Bellan blamed his secretary.

121. During this time, Bellan would also call Radford at odd hours of the night. Radford began to fear for her safety.

122. Because of this, she stopped coming in person to the D.C. office.

123. Bellan tried forcing Radford to talk to him by putting her under investigation.

124. During the interrogations, Radford spoke with several Baker employees, attempting to resolve the issues that Bellan orchestrated.

125. Radford even distributed a spreadsheet to address the concerns.

126. While being interrogated, Radford spoke with Marisha Lewis (“Lewis”), whom she informed of the issues. Lewis also witnessed many of the encounters between Bellan and Radford prior to Radford reporting.

127. Radford was initially skeptical of informing Lewis of the persistent issues because Bellan had stated that he hired Lewis because she “knew where all [his] skeletons were hidden.”

128. Lewis came to Radford’s office, and they spoke for over an hour where Radford explained many of the issues within the office that she was experiencing.

129. Lewis reported that she understood Radford’s concerns and would “work on getting [her] support from the firm.”

130. Lewis also stated that it was unreasonable to expect a junior associate to handle a large transfer pricing case and be responsible for administrative activities. Lewis followed this by stating Radford “should be tired of being everyone’s punching bag.”

131. After the in-person meeting, Radford attempted to call Lewis several times.

132. Radford also attempted to call employees from the accounting department, but they did not answer nor return her phone call.

133. Radford’s credit card was cancelled, and she could not speak with anyone about the issue.

134. Even though Radford’ card was not active, Radford was somehow still expected to travel for work, paying out of her own pocket.

135. Lewis never made any attempt to call Radford or meet in person.

136. Instead, Radford received a termination letter signed by Lewis.

137. Radford was not permitted to return to the office to retrieve her belongings.

138. Radford did not receive a severance.

139. Radford was asked to sign documents that restricted her speech and limited her potential employment opportunities, stating that she would need permission from the Firm.

140. Radford refused to sign the documents.

141. When Lewis sent Radford her final pay stub, it was significantly less than Radford's bi-weekly pay, but there was no explanation for the missing money.

**X. Bellan Retaliated Against Radford by Suing Her for Publicly Speaking Out About His Sexual Assault and Offers.**

142. Radford posted on LinkedIn about her experience with Bellan.

143. The post did not go viral, but her story became a part of national discussion when Bellan decided to sue her, twice, and get two restraining orders against her.

144. During this, Bellan endangered Radford and forced her to relocate her home by posting her address online.

145. Bellan also stalked Radford and sent the police to Radford's mothers' home in a different state.

146. Bellan sent numerous people, countless times, to both Radford's Maryland residence and Radford's mother's home.

147. Radford's mother became increasingly concerned for her safety, and the wellbeing of her daughter who was fearful of Bellan.

148. Since Bellan could not locate her, Bellan began sending people to locate Radford at the locations she previously frequented.

149. Bellan and Lewis also attempted to continuously call Radford, even after she was terminated.

150. The phone calls occurred so often that Radford had to block the numbers Bellan and Lewis would use.

**COUNT I**

**Hostile Work Environment Based on Sex and Race  
(D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.)  
as to the Firm**

151. Plaintiff restates and incorporates herein by reference paragraphs 1-166.

152. The Firm, through Bellan, subjected Radford to an unwelcome, sexually hostile environment during her tenure.

153. The environment was severe, pervasive, hostile, offensive and altered the terms and conditions of Plaintiff's employment with the Firm.

154. The Firm knew of this sexually harassing conduct and failed to take prompt, effective, or reasonable steps to stop it, prevent it from reoccurring, or protect Plaintiff from further harm.

155. The Firms conduct created a hostile work environment in violation of the D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.

156. Plaintiff has suffered substantial damages because of the Firm's unlawful actions, including lost pay and benefits, disruption of her career, and severe and ongoing emotional distress.

157. The Firm's unlawful actions were so outrageous or egregious and worthy of punishment, deterrence, or condemnation, warranting an award of punitive damages.

**COUNT II  
Quid Pro Quo Sexual Harassment  
(D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.)  
as to the Firm**

158. Plaintiff restates and incorporates herein by reference paragraphs 1-166.

159. Plaintiff was subjected to, via Bellan, in his role as Managing Partner, an unwelcome, sexually hostile environment during her tenure at the Firm, which included unwanted sexual advances and wrongful termination for not accepting those advances.

160. The Firm's conduct was severe, pervasive, hostile, offensive, and altered the terms and conditions of Plaintiff's employment with the Firm.

161. As the sexual harassment continued and worsened, Plaintiff's working conditions became intolerable to any reasonable person in Plaintiff's position.

162. The Firm's conduct violated D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.)

163. The Plaintiff suffered substantial damages because of the Firm's conduct, including pay and benefits, disruption of her career, and severe ongoing emotional distress.

164. The Firm's unlawful actions were so outrageous or egregious and worthy of punishment, deterrence, or condemnation, warranting an award of punitive damages.

**COUNT III**  
**Wrongful Termination in Violation of Public Policy**  
**(D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.)**  
**as to the Firm**

165. Plaintiff restates and incorporates herein by reference paragraphs 1-164.

166. Defendant's actions constitute wrongful termination in violation of public policy under D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.).

167. Plaintiff was employed by Defendant and performed all her necessary job duties.

168. Plaintiff received all positive performance reviews just a couple of months prior to her wrongful termination.



169. The termination was wrongful because it was made in violation of public policy, without just cause, and in retaliation for engaging in protected activity, such as reporting sexual harassment and discrimination.

**COUNT IV**  
**Retaliation**  
**(D.C. Human Rights Act, D.C. Code § 2-1401.01 et seq.)**  
**as to the Firm**

170. Plaintiff restates and incorporates herein by reference paragraphs 1-164.

171. Plaintiff repeatedly rejected Bellan's offers and conduct, both regarding Bellan and his son Reece.

172. On multiple occasions, Radford denied and avoided Bellan.

173. Bellan's assault continued and Radford felt isolated and afraid for her safety.

174. As the sexual harassment continued and worsened, Plaintiff's working conditions became intolerable to any reasonable person in Plaintiff's position.

175. The Firm's conduct, through Bellan and otherwise, violated D.C. Code § 2-1402.61.

176. Plaintiff has suffered substantial damages because of the Firm's illegal actions, including pay and benefits, disruption to her career and severe ongoing emotional distress.

177. The Firm's unlawful actions were so outrageous or egregious and worthy of punishment, deterrence, of condemnation warranting and award of punitive damages.

**COUNT V**  
**Assault and Battery**  
**as to Bellan**

178. Plaintiff restates and incorporates herein by reference paragraphs 1-164.

179. Bellan, intentionally and without the Plaintiff's consent, physically attacked her in a sexual nature on numerous occasions.

180. The contact was harmful and offensive to a reasonable sense of personal dignity.

181. Bellan's conduct constitutes assault and battery under D.C. law.

182. Bellan's actions places Radford in reasonable apprehension of imminent harmful or offensive touching, constituting assault.

183. As a direct and proximate result of Bellan's conduct, Plaintiff has suffered physical injuries, pain and suffering, diminished earning capacity, and other damages.

### **JURY TRIAL DEMAND**

Plaintiff demands a jury trial on all claims so triable.

### **PRAYER FOR RELIEF**

Plaintiff requests the Court enter judgement in her favor and award her the following:

- a. All statutorily available damages for the Firm's violations including backpay, front pay, economic, non-economic, and punitive damages to the fullest extent permitted by law;
- b. Compensatory damages for Bellan's tortious conduct to the fullest extent permitted by law;
- c. Costs and reasonable attorneys' fees;
- d. Pre-judgment and post-judgment interest;
- e. Final judgment on all counts; and
- f. Such other relief this Court deems just and proper

Dated: January 22, 2026

Respectfully submitted,

~~/s/ Brooke Radford~~

Brooke Radford (DC Bar No. 1779941)