

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

JOHN PHILLIP CATALFAMO,	)	CIVIL ACTION NO.
	)	
Plaintiff,	)	2:25-cv-01700-NR
	)	
v.	)	
	)	
CONNECTEDLIFE DESIGNS,	)	
THE STEREOSHOP, INC., and	)	
JUSTIN MAZON,	)	
	)	
Defendants.	)	JURY TRIAL DEMANDED
	)	

FIRST AMENDED COMPLAINT

AND NOW, comes Plaintiff, John Phillip Catalfamo (“Plaintiff” or “Mr. Catalfamo”), by and through his undersigned counsel, Rachel L. McElroy, Esquire, and hereby files this First Amended Complaint against Defendants, averring as follows:

I. Introduction

1. Plaintiff brings this action to recover damages, including, back pay, front pay, compensatory and punitive damages, as well as attorneys’ fees and costs, for unlawful employment practices committed against him in violation of 42 U.S.C. § 1981 (Section 1981), the Pennsylvania Human Relations Act, 43 P.S. § 951 et seq and Pennsylvania common law.

2. These claims arise from hostile work environment created by Defendants, and the discriminatory and retaliatory conduct by Defendants that adversely affected Plaintiff’s terms, conditions, and privileges of employment.

3. On or around October 15, 2024, Plaintiff filed a fully executed Complaint with the Pennsylvania Human Relations Commission and now timely files this First Amended Complaint after exhausting all administrative remedies under the PHRA.

4. On or around October 30, 2025, Plaintiff received a letter notification that it had been at least one year since he filed his Complaint with the PHRC.

5. Upon information and belief, the PHRA “dual-filed” the Charge with the Equal Employment Opportunity Commission (hereinafter “EEOC”).

II. Parties

6. Plaintiff, John Phillip Catalfamo (“Plaintiff” or “Mr. Catalfamo”), is an adult individual who resided in Jeannette, Westmoreland County, Pennsylvania during the events in the Complaint.

7. Defendant, ConnectedLife Designs (“CLD”), is a Pennsylvania domestic business corporation and a wholly owned subsidiary of The Stereo Shop, Inc., with a principal place of business located at 201 East Pittsburgh Street, Greensburg, Pennsylvania 15601.

8. Defendant, The Stereo Shop, Inc. (“TSS”), is a Pennsylvania domestic business corporation with a principal place of business located at 201 East Pittsburgh Street, Greensburg, Pennsylvania 15601.

9. Defendants CLD and TSS operate as an integrated enterprise, sharing common ownership, management, human-resources functions, employment policies, payroll, and business address as CLD does not maintain separate employees, management, or worksites apart from TSS, and functions solely as an extension of TSS.. They jointly employed Plaintiff for purposes of the PHRA and 42 U.S.C. § 1981.

10. At all relevant times, Defendants CLD and TSS employed more than four (4) employees. Accordingly, they are “employers” within the meaning of the Pennsylvania Human Relations Act, 43 P.S. § 954(b).

11. At all relevant times, Mr. Catalfamo, was an “employee” of CLD and TSS within the definition set forth in the Pennsylvania Human Relations Act.

12. Upon information and belief, Defendant, Justin Mazon (“Mr. Mazon”), is a part-owner and managerial agent of CLD and TSS, who personally participated in, and aided and abetted, the discriminatory and retaliatory conduct described herein. Mr. Mazon’s address is currently unknown to Plaintiff.

13. At the relevant times, Plaintiff was a protected member of a class in that Plaintiff identifies as bi-racial (both African American and Caucasian).

14. Furthermore, Plaintiff was a qualified individual with a disability within the meaning of the PHRA, in that he was able to perform the essential functions of his position with or without reasonable accommodation.

15. At all relevant times, Ms. Catalfamo had an employment contract with Defendants within the meaning of 42 U.S.C. § 1981 (Section 1981).

III. Jurisdiction and Venue

16. This Court has jurisdiction of this matter by virtue of 28 U.S.C. § 1331, in that this is a civil action wherein the matter in controversy arises under the laws of the United States.

17. This Court has supplemental jurisdiction over Plaintiff’s state law claim pursuant to 28 U.S.C. § 1367.

18. This Court has personal jurisdiction over Defendants because Defendants reside and/or are headquartered in Westmoreland Co, Pennsylvania.

19. Venue is proper in this judicial district under 28 U.S.C. § 1391(b), in that this is a civil action in which jurisdiction is not founded solely on diversity of citizenship, and the acts constituting a substantial part of the events and omissions giving rise to the claims occurred in the Western District of Pennsylvania.

IV. Facts

20. In or around June 2023, Mr. Catalfamo began working for CLD and TSS at their

Greensburg, Pennsylvania location as an Electronics Systems Integrator.

21. Prior to his employment with Defendants, Plaintiff worked with his late father for many years installing high-end audio and stereo systems in both residential and commercial settings. Plaintiff possesses extensive specialized knowledge and experience in the field, and Defendants hired him specifically for his expertise and client relationships. Plaintiff relocated to the Greensburg area following his father's passing to accept employment with Defendants.

22. Plaintiff received positive feedback regarding his performance during his initial weeks of employment until Defendants learned that Plaintiff is bi-racial and identifies at least in part as Black.

23. From the outset of his employment, Plaintiff observed coworkers making racially derogatory remarks in the workplace.

24. Approximately two weeks after starting his employment, Plaintiff informed several coworkers and supervisors, including Greg Morrison, Craig Kantoris, Jim Moyer, Dave McClelland, Tom Anky, and part-owner Justin Mazon, that he is part Black and asked them to stop making racially offensive comments. All of the above individuals identify as white.

25. Defendant Mr. Mazon, part owner of Defendants' business operations and Plaintiff's direct supervisor, refused to stop making such remarks. Instead, Mr. Mazon on an almost daily basis directed and repeated racially derogatory comments toward and about Plaintiff, including but not limited to the following examples:

- a. Referring to a Black driver as a "fucking nigger" while riding with Plaintiff, and frequently using that racial epithet in the workplace;
- b. Calling Plaintiff "EBN," short for "el blanco negro" ("white negro"), on a near-daily basis;
- c. Stating that "Black people steal things";

- d. Admitting that he “knew he was racist”;
- e. Referring to TV mounting hardware as “Obama ears” because “they’re big and black”; and
- f. Making numerous disparaging remarks about Black actors being given roles in television and film.

26. In addition to this verbal harassment, Mr. Mazon engaged in targeted intimidation and unfair treatment, frequently following Plaintiff around, micromanaging his work, and otherwise creating a racially hostile work environment. Plaintiff repeatedly asked Mr. Mazon to stop, but Mr. Mazon refused.

27. Mr. Mazon would also try to physically intimidate Plaintiff.

28. Mr. Mazon encouraged others to engage in the same racially discriminatory conduct.

29. Plaintiff reported Mr. Mazon’s discriminatory conduct to the other owners of Defendants and specifically requested to be reassigned so that he would not have to work with Mr. Mazon.

30. Despite this complaint, Defendants took no corrective action.

31. Instead, Mr. Mazon continued to request that Plaintiff accompany him on job assignments for the purpose of further humiliating and harassing Plaintiff because of his race including calling him “EBN” on a near daily basis.

32. On or about April 24, 2024, Plaintiff sustained a work-related injury when he fell out of a company vehicle and tore his calf muscle.

33. The injury lasted more than two weeks and substantially limited Plaintiff’s major life activity of working and walking.

34. Plaintiff’s physician imposed restrictions on his physical activity to aid recovery.

35. Initially, Plaintiff went back to work but found that it was too difficult to work with

his disability.

36. Plaintiff informed Defendants that he planned to file a workers compensation claim.

37. Plaintiff did in fact file a workers compensation claim.

38. On or about May 11, 2024, after informing Defendants of his disability and plan to file for Workers Compensation, Mr. Mazon informed Plaintiff that he was being terminated, instructing him to empty his company vehicle because Mr. Mazon was coming to retrieve it.

39. Defendants terminated Plaintiff because of his race and opposition to being called "EBN" or "el blanco negro" ("white negro").

40. Plaintiff emptied his company vehicle.

41. Mr. Mazon did in fact retrieve the company vehicle.

42. Plaintiff was never asked to return to work.

43. Plaintiff was never placed back on the schedule to work.

44. Plaintiff was not paid, other than Workers Compensation benefits, after his termination.

45. During the Workers Compensation proceedings, Plaintiff was never offered light duty or alternative work.

46. Plaintiff did not continue to use health insurance through Defendants.

47. Several months after Plaintiff's termination, Defendants counsel asserted that Plaintiff was never terminated. However, she never offered to place Plaintiff back on the schedule or help Plaintiff get back to work.

48. Defendants, through counsel, threatened to sue Plaintiff if he filed discrimination charges against them for the health care premiums they paid through June 2024.

49. Defendants threatened to sue Plaintiff in retaliation for opposing illegal discrimination. Suing plaintiff for the health care premiums paid on his behalf could have cost

Plaintiff a significant amount of money and effort in defending a frivolous lawsuit.

50. The threat to sue Plaintiff was designed to intimidate Plaintiff into dropping his potential discrimination claims and to keep him from filing them with the PHRC.

51. The threat to sue Plaintiff was in retaliation for Plaintiff's opposition to unlawful discrimination.

52. The threat of suing Plaintiff and all the ensuing legal costs and expenses might deter a reasonable person from engaging in protected activity.

53. The temporal proximity of Plaintiff's opposition to discrimination to his termination serves as evidence of causation.

54. The temporal proximity of Plaintiff's notification of his disability and intent to seek workers compensation to his termination serves as evidence of causation.

55. The hostile work environment created by Defendants was purposeful, severe and pervasive.

56. The hostile work environment, discrimination and retaliation Plaintiff suffered while working for Defendant affected his self-esteem and caused him severe emotional distress.

57. The Defendant's extreme and outrageous conduct warrants the imposition of substantial compensatory damages and punitive damages.

COUNT I

Violation of Section 1981- Race Discrimination

(Plaintiff v. ConnectedLife Designs, The Stereo Shop, Inc. and Justin Mazon)

58. Plaintiff incorporates by reference the averments contained in all preceding paragraphs as if fully set forth herein.

59. Defendants intentionally and willfully engaged in a series of unlawful acts in discriminating against Plaintiff with respect to compensation, terms, conditions, or privileges of employment in violation of Section 1981.

60. Defendants' racially discriminatory conduct was used as a basis for employment decisions affecting Plaintiff.

61. The conduct described above and herein was unlawful race discrimination committed by Defendant's employees, servants and/or agents who had the effective ability to influence employment actions that could affect Plaintiff, including but not limited to a hostile work environment and termination of employment.

62. As a direct and proximate result of Defendants' unlawful, willful, deliberate discrimination against Plaintiff, Plaintiff incurred substantial losses, continuing in their nature, including but not limited to loss wages and loss of benefits, harm to his reputation, adverse effects on his career and diminished earning capacity.

63. As a direct and proximate result of Defendants' unlawful, willful and deliberate discrimination against Plaintiff, Plaintiff suffered from emotional distress.

64. By reason of Defendants' unlawful, willful, outrageous and deliberate misconduct towards Plaintiff, Plaintiff is entitled to recover both compensatory and punitive damages in addition to actual damages.

65. Plaintiff has been directly harmed as a result of Defendant's violations as is fully set forth above.

COUNT II

Violation of Section 1981 - Hostile Work Environment

(Plaintiff v. ConnectedLife Designs, The Stereo Shop, Inc. and Justin Mazon)

66. Plaintiff incorporates by reference all preceding paragraphs of this First Amended Complaint as though fully set forth herein.

67. Defendants, through their owners, supervisors, and agents, subjected Plaintiff to a racially hostile and abusive work environment in violation of 42 U.S.C. § 1981.

68. Plaintiff was regularly subjected to severe and pervasive racial harassment, including

repeated use of racial epithets, such as the word “n****r,” and other racially derogatory comments by Defendant Mazon and other employees.

69. Plaintiff was also called “EBN” (“el blanco negro”) and targeted with other demeaning remarks based on his race.

70. The racial harassment was open, frequent, and tolerated by Defendants’ ownership and management, who failed to take any remedial action despite Plaintiff’s complaints.

71. Mr. Mazon personally engaged in and perpetuated this racially hostile environment through his own statements and conduct and by encouraging or condoning similar behavior by others.

72. Accordingly, Mazon is individually liable under 42 U.S.C. § 1981.

73. The harassment was sufficiently severe or pervasive to alter the terms and conditions of Plaintiff’s employment and to create an intimidating, hostile, and abusive work environment.

74. As a direct and proximate result of Defendants’ conduct, Plaintiff suffered emotional distress, humiliation, loss of enjoyment of life, and other damages.

75. Defendants’ conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff’s federally protected rights, entitling him to compensatory and punitive damages, attorneys’ fees, costs, and such other relief as this Court deems just and proper.

COUNT III

Violation of Section 1981 – Retaliation

(Plaintiff v. ConnectedLife Designs, The Stereo Shop, Inc. and Justin Mazon)

76. Plaintiff incorporates by reference all preceding paragraphs of this First Amended Complaint as though fully set forth herein.

77. Plaintiff engaged in protected activity under 42 U.S.C. § 1981 when he complained to Defendants’ ownership and management about racially offensive language, harassment, and discriminatory treatment in the workplace.

78. Defendants, acting through their owners, managers, and agents, retaliated against Plaintiff for engaging in this protected activity by continuing to subject him to a hostile work environment, denying his request for reassignment away from his harasser, and ultimately terminating his employment.

79. Mr. Mazon, as a part-owner and managerial employee of Defendants, personally participated in and aided, abetted, and directed the retaliatory conduct described herein and is individually liable under 42 U.S.C. § 1981.

80. The close temporal proximity between Plaintiff's protected complaints and his termination, together with the ongoing pattern of retaliatory conduct, establishes a causal connection between Plaintiff's protected activity and Defendants' adverse actions.

81. As a direct and proximate result of Defendants' unlawful retaliation, Plaintiff has suffered and continues to suffer emotional distress, humiliation, loss of income, and other damages.

82. Defendants' conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's federally protected rights, entitling him to compensatory and punitive damages, attorneys' fees, costs, and such other relief as this Court deems just and proper.

COUNT IV

Violation of the Pennsylvania Human Relations Act – Aiding and Abetting and Retaliation (Plaintiff v. Justin Mazon)

83. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

84. Defendant Mazon was Plaintiff's supervisor.

85. Defendant Mazon knew that he was engaging in racial discrimination and encouraged others to engage in discrimination against Plaintiff in violation of the aiding and abetting provision of the Pennsylvania Human Relations Act ("PHRA"), 43 P.S. § 951 et seq.

86. Plaintiff asked Defendant Mazon to stop engaging in discrimination.

87. Mr. Mazon, as a managerial employee and part-owner of Defendants ConnectedLife Designs and The Stereo Shop, Inc., aided, abetted, incited, compelled, and coerced the retaliatory and discriminatory conduct described herein, in violation of 43 P.S. § 955(e).

88. Mr. Mazon personally participated in and substantially assisted Defendants' retaliation against Plaintiff for his protected activity, making him individually liable under the PHRA.

89. Defendants' conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's rights, entitling him to compensatory and punitive damages, attorneys' fees, costs, and any other relief this Court deems just and proper.

COUNT V

Violation of the Pennsylvania Human Relations Act – Disability Discrimination and Failure to Accommodate

(Plaintiff v. ConnectedLife Designs and The Stereo Shop, Inc.)

90. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

91. Defendants' conduct, as described above, constitutes disability discrimination in violation of the Pennsylvania Human Relations Act ("PHRA"), 43 P.S. § 951 *et seq.*

92. At all relevant times, Plaintiff was a qualified individual with a disability within the meaning of the PHRA, in that he was able to perform the essential functions of his position with or without a reasonable accommodation.

93. Defendants were aware of Plaintiff's injury and resulting physical restrictions but failed to engage in the interactive process to determine whether a reasonable accommodation could be made.

94. Instead, Defendants terminated Plaintiff's employment immediately after his

injury, thereby denying him any opportunity to request or receive a reasonable accommodation.

95. Defendants' actions were willful, intentional, and taken with reckless disregard for Plaintiff's rights under the PHRA.

96. Plaintiff is entitled to recover compensatory damages, punitive damages, attorneys' fees, costs, and such other relief as this Court deems just and proper

COUNT VI

Violation of the Pennsylvania Human Relations Act – Retaliation (Plaintiff v. ConnectedLife Designs and The Stereo Shop, Inc.)

97. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

98. Defendants, through their owners, supervisors, and agents, intentionally and willfully retaliated against Plaintiff for opposing race discrimination and harassment in violation of the Pennsylvania Human Relations Act ("PHRA"), 43 P.S. § 951 *et seq.*

99. Plaintiff engaged in protected activity when he reported ongoing racial harassment and discrimination to Defendants' management.

100. Defendants subsequently subjected Plaintiff to adverse employment actions, including continued harassment, denial of reassignment away from his harasser, and ultimately termination of employment.

101. Additionally, Plaintiff was threatened with expensive litigation if he filed an administrative complaint which was designed to deter a reasonable person from filing a complaint of discrimination.

102. The temporal proximity between Plaintiff's protected complaints and his termination, as well as the continued mistreatment leading up to the termination, establishes a

causal connection between his protected activity and Defendants' retaliatory actions.

103. As a direct and proximate result of Defendants' unlawful retaliation, Plaintiff has suffered and continues to suffer emotional distress, humiliation, loss of income, and other damages.

104. Defendants' conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's rights, entitling him to compensatory and punitive damages, attorneys' fees, costs, and any other relief this Court deems just and proper.

COUNT VII

Violation of Pennsylvania Public Policy – Workers' Compensation Retaliation (Common Law) (Plaintiff v. ConnectedLife Designs and The Stereo Shop, Inc.)

105. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

106. Pennsylvania law recognizes a common law cause of action for wrongful termination in violation of public policy when an employer discharges an employee in retaliation for exercising rights under the Pennsylvania Workers' Compensation Act. *Shick v. Shirey*, 716 A.2d 1231 (Pa. 1998).

107. Plaintiff engaged in protected activity when he filed a Workers' Compensation claim following a workplace injury sustained on or about April 24, 2024.

108. Defendants, through their owners, supervisors, and agents, including part-owner and managerial agent Justin Mazon, terminated Plaintiff's employment the day after he reported his injury and sought medical attention.

109. The temporal proximity between Plaintiff's workplace injury, the filing of his Workers' Compensation claim, and his termination establishes a causal connection between Plaintiff's protected activity and Defendants' retaliatory actions.

110. Defendants' actions in discharging Plaintiff were intentional, willful, and in violation of the clear public policy of the Commonwealth of Pennsylvania prohibiting retaliation against employees who exercise rights under the Workers' Compensation Act.

111. As a direct and proximate result of Defendants' unlawful retaliation, Plaintiff has suffered and continues to suffer emotional distress, humiliation, loss of income, and other damages.

112. Defendants' conduct was willful, malicious, and undertaken with reckless disregard for Plaintiff's rights, entitling him to compensatory and punitive damages, attorneys' fees, costs, and any other relief this Court deems just and proper.

COUNT VIII

Violation of the Pennsylvania Human Relations Act (Hostile Work Environment – Race and Discrimination - Race)

(Plaintiff v. ConnectedLife Designs and The Stereo Shop, Inc.)

113. Plaintiff incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein.

114. The Pennsylvania Human Relations Act ("PHRA"), 43 P.S. § 951 et seq., prohibits employers and their agents from subjecting employees to harassment, intimidation, or differential treatment based on race or color, and from aiding, abetting, inciting, compelling, or coercing such conduct.

115. During the course of his employment, Plaintiff was subjected to a severe and pervasive pattern of racially hostile conduct by his direct supervisor Justin Mazon and other white employees and agents of Defendants ConnectedLife Designs and The Stereo Shop, Inc.

116. The racially hostile conduct included, but was not limited to, repeated use of racial epithets, slurs, and derogatory remarks directed at and about Plaintiff, including frequent use of the word "n****r," referring to Plaintiff as "EBN" (short for "el blanco

negro”), and other degrading statements about Black people.

117. Mr. Mazon, who was Plaintiff’s direct supervisor and a part-owner of Defendants’ business operations, regularly and openly made such comments in the workplace and refused to stop when Plaintiff objected.

118. Mr. Mazon also engaged in other intimidating and demeaning conduct toward Plaintiff, including excessive scrutiny, micromanagement, and deliberately assigning Plaintiff to work with him despite Plaintiff’s complaints about the racially offensive behavior.

119. Plaintiff reported this conduct to Defendants’ ownership and management and specifically requested to be reassigned away from Mr. Mazon, but Defendants failed to take any remedial or corrective action.

120. As a result, the racially hostile environment continued unabated, interfering with Plaintiff’s ability to perform his job duties and creating an intimidating, abusive, and offensive work environment.

121. Plaintiff was treated differently than other white employees.

122. Mr. Mazon, as a managerial employee and part-owner of Defendants ConnectedLife Designs and The Stereo Shop, Inc., aided, abetted, incited, compelled, and coerced the unlawful conduct described herein, in violation of 43 P.S. § 955(e).

123. Mr. Mazon personally participated in, and provided substantial assistance to, the creation and continuation of a racially hostile work environment. Accordingly, he is individually liable under the PHRA for aiding and abetting Defendants’ violations.

124. Defendants’ conduct was severe and pervasive enough to alter the terms and conditions of Plaintiff’s employment and to create an abusive working environment in violation of the PHRA.

125. As a direct and proximate result of Defendants’ unlawful conduct, Plaintiff

has suffered and continues to suffer emotional distress, humiliation, loss of self-esteem, loss of income, and other damages.

126. Defendants' conduct was willful, malicious, and undertaken with reckless indifference to Plaintiff's rights, entitling him to compensatory and punitive damages, attorneys' fees, costs, and such other relief as this Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, John Phillip Catalfamo, respectfully requests that this Honorable Court enter judgment in his favor and against Defendants, and award him the following relief:

1. Compensatory damages for emotional distress, humiliation, mental anguish, loss of income, and other economic and non-economic losses;
2. Punitive damages for Defendants' willful, malicious, and reckless conduct;
3. Back pay, front pay, and other lost wages and benefits, together with pre- and post-judgment interest;
4. Reasonable attorneys' fees and costs of litigation, including expert fees where applicable;
5. Injunctive or equitable relief as the Court deems appropriate to prevent further discrimination, harassment, retaliation, and failure to accommodate; and
6. Such other and further relief as this Court deems just and proper.

JURY TRIAL DEMANDED

Respectfully submitted,

McELROY LAW FIRM LLC

Date: November 6, 2025

By:

A handwritten signature in dark ink, appearing to read "Rachel L. McElroy", written over a light gray horizontal line.

Rachel L. McElroy

PA ID No. 321624

McElroy Law Firm, LLC

960 Penn Avenue, Suite 1001

Pittsburgh, PA 15222

Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,

MCELROY LAW FIRM LLC

By: 

Rachel L. McElroy

PA ID No. 321624

Counsel for Plaintiff