

IN THE UNITED STATES DISTRICT OF COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

JUN - 6 2005 WH

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Delores Ammons-Lewis,

Plaintiff,

vs.

Metropolitan Water Reclamation District,

Defendant.

Case No. 03 C 0885

Judge Matthew F. Kennelly

Magistrate Judge Sidney I. Schenkier

Jury Demand

NOTICE OF FILING

To: Kevin Lee
Greene & Letts
111 West Washington Street
Suite 1650
Chicago, Illinois 60602

PLEASE TAKE NOTICE that on Monday, June 6, 2006, I caused *Plaintiff's Offer of Proof Concerning Testimony of Other Female Employees* to be filed (a) with the Clerk of the U.S. District Court for the Northern District of Illinois, (b) with Judge Kennelly's Chambers, and (c) with Judge Kennelly via e-mail (matthew_kennelly@ilnd.uscourts.gov). A copy of said documents is attached hereto and herewith served upon you.

CERTIFICATE OF SERVICE

I, Jennifer K. Soule, one of Plaintiff's attorneys, hereby certify that I caused this Notice of Filing and all attached documentation to be served upon the above referenced addressee via hand delivery on or before the hour of 5:00 p.m. on June 6, 2005.



One of Plaintiff's Attorneys

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**PLAINTIFF'S OFFER OF PROOF CONCERNING
TESTIMONY OF OTHER FEMALE EMPLOYEES**

Pursuant to the Court's order of June 2, 2005, plaintiff provides the following information concerning the anticipated testimony of certain current or former female employees of Defendant listed on plaintiffs' 6/2/05 trial calendar. Concerning certain of these witnesses, plaintiff provides this information with a degree of hesitancy because it has been reported to plaintiff's counsel during trial preparation that attorneys for the District have met during work hours (as if it is required of these women as part of their job) with female employees who may be called in this trial numerous times about what they might testify. Feelings of fear of retaliation, and discomfort concerning appearing at Ms. Ammons-Lewis' trial have been reported to plaintiff's counsel. Defense counsel has accepted service of subpoenas for these women. Plaintiff may seek relief in terms of the appearance of these witnesses and reassurance from the Court to them concerning non-retaliation, if needed.

Concerning the general background of the facts of this case, defendant has claimed and is expected to claim that sexually explicit materials were not observed by other women besides plaintiff, particularly at her Calumet work sites, thus diminishing plaintiff's credibility about its

prevalence and offensiveness. Further, defendant has claimed and is expected to claim that its response to plaintiff's sexual harassment complaints was prompt and reasonable, inasmuch as it is defendant's claim that plaintiff failed to properly or timely complain of sexual harassment. Plaintiff has testified that when she tried to complain and then to follow up on some of her complaints of sexual harassment to EEO/Training Manager Francis Wilkins in December, 2001, Wilkins told her, *among other things*, that she was too busy to respond because she was putting out fires of other sexual harassment complaints. Wilkins denies plaintiff complained to her in December, 2001 at all, including of sexual harassment. The testimony concerning Salema Ali, Shirley Edenberg and Neshawn Moore described below corroborates plaintiff's December 2001 contacts with Wilkins. Plaintiff asserts that defendant's complaint policies and procedures both as written and as administered in her case as well as in the cases of other women was woefully inadequate, including with the knowledge and acquiescence of defendant's top management. Defendant's manager, Stephen Kelly, has also denied that he made sexually inappropriate statements to plaintiff, including a comment about her cleavage and that he liked black women, wanted some "black stuff" and would pay for sex with black women.

1. Cora Zanders: Ms. Zanders is expected to testify, as she reported to the Illinois Department of Human Rights Investigator Vesna Stelcer in January, 2003, that she observed pornography magazines at the Calumet and Stickney plant locations, including plaintiff's work stations. Further, Ms Zanders is also expected to testify that she previously complained to defendant's EEO/Training Manager, Francis Wilkins, of sexual harassment by a co worker, but that her complaints were deterred by Wilkins (as were plaintiff's), that Wilkins encouraged her not to follow through with her complaints, and that Wilkins turned the accusations towards Zanders based

on Wilkins accepting a false claim of a relationship between Zanders and the alleged harasser. Ms. Zanders reported to IDHR that she was scared because nothing was done about her complaint, which was never investigated, and that she was labeled a troublemaker for complaining.

2. Salema Ali. Salema Ali (who, like plaintiff is African-American) is expected to testify, as she reported to the Illinois Department of Human Rights Investigator, that defendant's manager and plaintiff's supervisor, Stephen Kelly, asked Ali for her phone number, gave her his phone number, commented to Ali that he likes black women, is known amongst defendant's female employees to sexually proposition black women, and frequently tells women with large breasts that he likes their big breasts. Ms. Ali is expected to testify, as she reported to the IDHR, that sexually explicit materials were prevalent throughout defendant's work places, and that, in particular, she observed sexually explicit materials at plaintiff's Calumet work place. Ms. Ali is also expected to testify that she complained of sexual harassment concerning a supervisor at the Stickney plant touching her breasts and vagina on more than one occasion. Ms. Ali reported to the IDHR that when she complained, she was labeled a troublemaker and treated like it was her fault for complaining. Ms. Ali's sexual harassment complaint was to Wilkins in December 2001, the month in which as noted above a major incident of sexual harassment towards plaintiff, which plaintiff reported to Wilkins, also occurred. Ms. Ali took time off of work because she was distressed, but Wilkins told Ms. Ali she would not do an investigation unless Ali returned to work. Ms. Ali then returned to work and met with Wilkins. During this short meeting, Ms. Ali was extremely upset. Wilkins' response to Ali was simply that it was the harasser's word against hers. Like here, the harasser was not disciplined. Ms. Ali will also provide evidence relating to damages as well as to the fact that only public outcry caused any kind of response (though still inadequate) to complaints of sexual

harassment at the District in that she was part of a group of women including plaintiff who met in support of each other as they dealt with the personal effects of defendant's unresponsiveness to their complaints, and who eventually demonstrated in front of defendant's headquarters in November, 2002, providing evidence of sexually explicit materials in their work places and publicly stating their complaints of sexual harassment against defendant.

3. Shirley Harris (fka Edenburg)¹ Harris testified previously² and is expected to testify that, a considerable time after the sexual harassment complaint of District Employee Neshawn Moore concerning a male employee who (among other similar conduct and statements) exposed his penis to her at work at the Stickney plant (where plaintiff and various managers worked previously or work now) on more than one occasion, Harris was eventually contacted by Wilkins. Harris confirmed and reported to Wilkins that the same employee had exposed his penis to her in the work place on more than one occasion. Plaintiff discussed that employee and his conduct towards plaintiff with Wilkins in December 2001 as well. Harris will testify that Wilkins was rude and badgering to her and did not appear to want to listen to her. Harris will also testify that Wilkins told her that the conduct reported was not sexual harassment. Wilkins' testimony concerning Moore's complaint of sexual harassment, as it was during Moore's recent trial against defendant, at which a verdict in favor of Moore under Title VII was reached, is very similar to her testimony about how she handled (or

¹Shirley Edenberg has been listed on plaintiff's trial witness list, particularly on the revised pre trial order list presented to the Court in December, 2004, as plaintiff's and defendant's counsel reviewed their witness lists in order to estimate the time of witness testimony on their revised pre trial order witness lists. (Ex. A) Edenburg (Harris) has been shown to defendant on plaintiff's trial calendar since December. (Ex. B) Edenburg was also referenced in the report of Callie Baird.

²At the January, 2005 trial of Neshawn Moore v. MWRDGC before Magistrate Judge Nolan, Case No. 02 C 4040.

mishandled) plaintiff's complaints of sexual harassment. See, Pl.'s LR 56.1 Statement of Additional Facts, §III.E.F., X.

In particular, Moore complained to Wilkins in September, 2001 (in the midst of the relevant time period in plaintiff's case), but Wilkins did not respond until February, 2002 (also during the relevant time period here, as noted above), but Wilkins has provided incredible and inconsistent testimony about why. Likewise, in this case, Wilkins continuously failed to respond to plaintiff's complaints before and including 2001. Then Wilkins denied that plaintiff complained about the Davis attack in December, 2001, though this denial is not credible. Further, Wilkins' pattern of deterring and covering up complaints of sexual harassment is similar in plaintiff's case, through the time of the public demonstration and in her discovery deposition. Moore's complaints of sexual harassment were brought to Wilkins' attention in 2001 and through the same period in 2002 as plaintiff's complaints. Moore was also part of a group of women including plaintiff who met in support of each other as they dealt with defendant's unresponsiveness to their discrimination and sexual harassment complaints, and who eventually demonstrated in front of defendant's headquarters in November, 2002, providing evidence of sexually explicit materials in their work places and publicly stating their complaints of sexual harassment against defendant.

4. Elnora Wilson. Ms. Wilson is expected to testify that she worked at the Calumet Central Control building during the time frame that plaintiff observed sexually explicit materials in the Central Control kitchen, located in that building. Defendant has denied that various sexually explicit items plaintiff has testified she recalls seeing were posted in the kitchen. Defendant destroyed the items posted in the kitchen on what was known by the male employees as "The Wall Of Fame" during the time plaintiff's EEOC and IDHR charges were pending (which plaintiff will

argue should result in an instruction to the jury that an inference may be drawn against defendant concerning the nature of these materials). Defendant has further denied that plaintiff was actually offended by items posted in the kitchen, particularly during the time frame leading up to her IDHR charge, filed in the Spring of 2002. Ms. Wilson will testify that, from 2000 through early 2002 when she transferred from there, she and plaintiff were nearly the only women working at Calumet, which is a very male dominated work environment. Ms. Wilson is expected to testify that she recalls sexually explicit items posted in the kitchen, including those defendant has denied being there. Ms. Wilson will testify to her experience that, to get along at the District as a woman, you had to become jaded and try not to look at the sexual or other offensive things that were posted, because if you made waves, you would be punished. Ms. Wilson will also testify that, during the relevant time period, she believed she was being sexually harassed by a co-worker and attempted to complain to Wilkins. However, consistent with plaintiff's experiences, Wilkins deterred Wilson, including by stating to Wilson to wait to see what they would do ("let it happen") and then come back again to complain. This is similar to what Wilkins told plaintiff in order to deter her complaint. Like in plaintiff's case, as a result of Wilkins' avoidance and deterrent behavior, Wilson did not formalize her complaint onto the District's form, so nothing was done about it. Wilson is expected to testify that she and plaintiff, being of a very few number of women at Calumet, would walk together during lunch time. Ms. Wilson will testify that plaintiff told her during that time period that the sexually explicit items posted in the Central Control kitchen were upsetting to plaintiff, were degrading to women and that plaintiff was bothered by them.

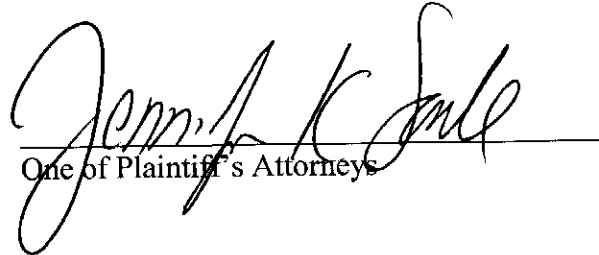
5. Sharon Cox-Davis. Ms. Cox-Davis, a Labor Foreman who worked at Calumet, is expected to testify, as she reported to the Illinois Department of Human Rights Investigator, that

defendant's management knew of sexual harassment. Ms. Cox-Davis is expected to testify that the work environment at Calumet is predominantly male and chauvinistic, and that they are still not used to having female employees around. Ms. Cox-Davis is expected to testify, as she reported to the IDHR in January, 2003, that sexually explicit materials such as pornographic magazines, are around at Calumet, including in drawers.

6. Potential Rebuttal Witnesses. Plaintiff reserves the right to call other witnesses on her may call list or in rebuttal generally and notes in this regard that testimony similar to that noted above was reported by additional women to the IDHR and Callie Baird. See, Exhibit C hereto, IDHR interview notes, including regarding certain witnesses, above.

The above evidence is directly relevant to proving both plaintiff's Title VII and 42 U.S.C. §1983 claims and not severable.

Respectfully submitted,



One of Plaintiff's Attorneys

Dated: June 6, 2005

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312-616-4422

Exhibit A

LIST OF WITNESSES¹

PLAINTIFF INTENDS TO CALL THE FOLLOWING WITNESSES				
Witness	Plaintiff's Estimate of Time²	Defendant's Estimate of Time²	Also Listed by Defendant	
			Will Call	May Call
Delores Ammons	4(+) - 6			
Callie Baird	2			
Robert Crawford ³	.25			
Willie Davis ³	1	1.0-1.5	X	
Charles Jones ³	1	1.0-1.5	X	
Stephen Kelly ³	1.5 - 2	1.0-1.5	X	
Frances Wilkins ³	1.5 - 3	1.5-3.0	X	
Antonio Quintonilla ³	1.5 - 2	1.5	X	
Barbara McGowan ³	.5 - 1			
Patricia Young ³	.5 - 1			
John Farnan ³	.75	1.0		
Matthew Menze ³	1.5 - 2			
Hank Marks ³	.5	2.0-3.0	X	
Dr. Sherrie Godbolt	.75			
Salema Ali ⁴	1			
James Harris ³	.5 - 1			

¹ Subject to modification up to time of filing Final Pretrial Order.

² Not allowing for impeachment, "memory lapses," etc.

³ Pursuant to the agreement reached in the pretrial conference with Judge Kennelly, defense counsel has agreed to accept service of trial subpoenas for District employees. Plaintiff served defense counsel with trial subpoenas on December 6, 2004.

⁴ Plaintiff served defense counsel with trial subpoenas on December 6, 2004.

Witness	Plaintiff's Estimate of Time ²	Defendant's Estimate of Time ²	Also Listed by Defendant	
			Will Call	May Call
Steve Levy ³	.5			
Shirley Edenburg ⁴	1			
Total (High End)	28.25			
Total (Low End)	21.25			

DEFENDANT INTENDS TO CALL THE FOLLOWING WITNESSES				
Witness	Defendant's Estimate of Time ²	Plaintiff's Estimate of Time ²	Also Listed by Plaintiff	
			Will Call	May Call
Marvin Sims	1.0			X
James McCague	1.0			X
Antonio Quintonilla			X	
Thomas O'Connor	1.0			X
Patrick Foley	1.0-1.5			X
Robin Mischeck	.5			
Kathy Lai	.5			
Kinga Stanek	.5			
Lisa Kursell	.5			
Dr. Peter Fink	2.0			
Dr. Abigail Sivon	1.5			
Thomas Tiffany	.5			X
Kaye Heidenrieck	.5-1.0			X
Total (High End)				
Total (Low End)				

PLAINTIFF MAY CALL THE FOLLOWING WITNESSES				
Witness	Plaintiff's Estimate of Time ²	Defendant's Estimate of Time ²	Also Listed by Defendant	
			Will Call	May Call
Vesna Stelcer (IDHR)				
James McCague ³				
Greg Cargill ³		.5		X
Thomas O'Connor ³				
Hayward Ford ³		.5		X
John Cunane ³		.5		X
Mark Vosberg ³		.5		X
Gloria Majewski		15 min		X
Rene Ferguson				
Victor Switski				
Kay Heidenrieck ³ (and other District Police)		.5		X
Officer T. Tiffany ³		.5		X
Diane Gunn ⁴		.3		X
Carolyn Grice ⁴		.3		X
Phaedra Alexander ⁴		.3		X
Cora Zanders ⁴		.3		X
Sharon Cox-Davis ⁴		.3		X
Eleanor Wilson ⁴		.3		X
Sherry Phelan ⁴		.3		X
Mary Egan ⁴		.3		X
Marvin Sims			X	
Patrick Foley ³		.5-1.0		

Plaintiff's Depositions to Be Read into Evidence: None, unless a witness is unavailable to testify at trial. Pre-trial evidence depositions may be sought, if necessary.

Plaintiff reserves the right to call any of defendant's designated witnesses to the extent such witnesses are not precluded from testifying by the Court on other grounds and to call additional witnesses as required to rebut evidence at trial which was not reasonably anticipated or foreseeable at the time of the close of discovery.

Exhibit B

JUNE 2005

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9 Pick Jury Opening Stmt [Ammons]	10 Ammons Crawford Kelly	11
12	13 [Kelly] Davis Jones Dunlap	14 Marks McCague Menze (transcript) Zanders Ali [Wilson]	15 [Cox-Davis] Harris (Edenburg) Wilkins Farnan Stelcer	16 Harris McGowan Young Baird Godbolt Quintanilla [Heidenrieck]	17 [Pls.' Misc. May Call, if any] Def.'s Case	18
19	20 Def.'s Case [Closings]	21 Def.'s Case [Closings]	22	23	24	25
26	27	28	29	30		

Exhibit C

Witness Statement Form

Re: Charge No.: 2002CN2480/2483Complainant: Delores D. AmmonsRespondent: Davis/NellyWitness Name: Saleema AliEEO Category: (female)

Witness Address: _____

Tel.No.: () (713) 471-6131Title/position of witness: Shift Laborer
(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)Interviewed witness by X telephone _____ in personDate 01.06.03 Time 3:10 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- works @ the Stuckney Plant @ the WRDC.
- has worked w/ Cp; not present the day the incident occurred; Davis has not made any sexual advances toward her; Nelly has asked for her number, given his # to her, says he likes black women, propositions them, says he likes big breasts, tells women w/ big breasts that he likes them.
- hostile work env't; Cp's supervisor touched her vagina (massaged)
- everyone knows that Nelly hit on the black women
- sexually explicit material is prevalent throughout
- when witness complained she was labeled as a troublemaker; treat her like it is her fault for complaining.

VKS

Investigator

#14A/CPFORMS Rev.2/9/99

01.06.03

Date

Witness Statement Form

Re: Charge No.: 2002 CN 2680 / 2683

Complainant: Delores D. Ammons

Respondent: Willie Davis / Stephen Kelly

Witness Name: Sharon Cox-Davis

EEO Category: Female

Witness Address: _____

Tel.No.: () (773) 256-3730

Title/position of witness: Labor Foreman

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by X telephone _____ in person _____

Date 01.06.03 Time 11:56 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- no first hand knowledge of incidents blw Cp: Davis / Kelly
- has had 2 personal experiences of sexual harassment @ WRDC. (1986 @ 1991).
- works @ Calumet plant; has not had any experiences of sexual harassment w/ Stephen Kelly / Willie Davis
- mgmt @ WRDC knew of the sexual harassment / get you white on probation (more vulnerable); chauvinistic env't, predominantly male,
- still not accustomed to women being around; sexually explicit material around e.g. magazines in drawers etc.

YHS

Investigator

#14A/CPFORMS Rev.2/9/99

01.06.03

Date

Witness Statement FormRe: Charge No.: 2004CN2080/4683Complainant: Delores D. Ammons

Respondent: _____

Witness Name: Neshawn MooreEEO Category: (female)

Witness Address: _____

Tel.No.: () (708) 371-0885Title/position of witness: Maintenance Laborer (afternoon shift)
(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)Interviewed witness by X telephone _____ in personDate 01.06.03 Time 11:37 am Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

'worked @ diff. plants', witness worked @ Stickney Plant.• sexual harassment began right away when she started w/ KateReclamation district.• people having sex in the washrooms, locker rooms, being exposed to private parts, being asked for oral sex; Paul Wysocki (male), ACE• her supervisor told her that if she complained individuals would be of to get her; labeled as a "crazy bitch" b/c she complained about sexual harassment; received a phone call that there was a makeshift bomb under car (11/01/02); afraid to work there.• does not know Willie Davis or Stephen Kelly.VKS

Investigator

#14A/CPFORMS Rev.2/9/99

01.06.03

Date

P1408

Witness Statement Form

Re: Charge No.: 2002CN2680/4683Complainant: Delores D. AmmonsRespondent: Willie Davis / Stephen KellyWitness Name: Cora SandersEEO Category: (Female)

Witness Address: _____

Tel.No.: () (773) 737-6502Title/position of witness: Shift Laborer.

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by X telephone _____ in personDate 01.06.03 Time 10:41 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- have worked @ the same plant but not present @ Calumet plant
- when incident occurred w/ Davis/Kelly (12/2001)
- works as relief; no problems
- had issues @ Calumet plant; made a sexual harassment charge against
- a co-worker; witness was scared b/c nothing was done about her complaint
- never had an interview w/ HR, they never investigated; witness labeled
- as a troublemaker; Rf made her life more difficult b/c of her complaint
- worked w/ Kelly; she had no problem w/ him (he was responsible for time
- off); worked w/ Davis a few times, never made any sexual advances/remarks
- Kelly never made any sexual advances/remarks
- sexual material (books/magazines) prevalent in drawers/desk;
- sexual jokes posted on the refrigerator.

VHS

Investigator

#14A/CPFORMS Rev.2/9/99

01.06.03

Date

Witness Statement Form

Re: Charge No.: Davis/Kelly

Complainant: Delores P. Ammons Respondent: 2002CNA680/d683

Witness Name: Elizabeth M. Ammons EEO Category: Female

Witness Address: _____

Tel.No.: () (773) 643-4481

Title/position of witness: Former Laborer

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by _____ telephone _____ in person

Date 01.14.03 Time 10:58 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- has not been there since 1987;
- reported sexual harassment ? was told that it would not have happened if females
- never had any sexual harassment incidents w/ Davis/Kelly

VKS

Investigator

#14A/CPFORMS Rev.2/9/99

01.14.03

Date

P1405

Witness Statement Form

Re: Charge No.: 2002CV20801/2083Complainant: Delores P. AmmonsRespondent: Willie Davis / Stephen KellyWitness Name: Deleste HamerEEO Category: Female

Witness Address: _____

Tel.No.: () ⁷⁰⁸ ~~(312)~~ 841-8706Title/position of witness: Laborer Foreman
(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)Interviewed witness by X telephone _____ in personDate 01.16.03 Time 4:00 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- works @ Cp's location (Columet plant)
- currently on leave of absence; left prior to the incident w/ Davis/Kelly
- is 12.12.01; no first hand knowledge; all-male environment
- has experienced sexual harassment by a supervisor/co-worker in the 1980s
- has not experienced sexual harassment from Davis; Kelly always compliments witness; does not view compliments as sexual harassment; Kelly always approaches black females; usually goes to PR where he is the only white individual

VMS

Investigator

#14A/CPFORMS Rev.2/9/99

01.16.03

Date

P1404

Witness Statement Form

Re: Charge No.: 04CIV2603

Complainant: Delores D. Ammons

Respondent: Stephen Kelly

Witness Name: Tanya Ammons

EEO Category: female

Witness Address: _____

Tel.No.: () (773) 643-4481

Title/position of witness: Laborev

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by X telephone _____ in person

Date 01.29.03 Time 1:30 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

Worked on same shift/plant as Cp; did not have the same supervisors
when she began working in 1984, Rp was her supervisor; always made
comments like how he thought she was attractive; propositioned her
for sex; on one occasion, Rp asked witness to enter the kitchen area
and then he kissed her; witness was on probation & was afraid to tell
anyone; no other incidents after her transfer in 1987
not uncommon to see "girlie magazines" in the desk drawer of the TAPR
area; Rp known for being attracted to black women & approaches
them for sex.

VHS

Investigator

#14A/CPFORMS Rev.2/9/99

01.29.03

Date

Witness Statement Form

Re: Charge No.: 2002CN2680/2683

Complainant: Delores D. Ammons

Respondent: Stephen Kelly / Willie Davis

Witness Name: Pasha Hunt-Golliday

EEO Category: Female

Witness Address: _____

Tel.No.: () (773) 466-3793

Title/position of witness: Fireman Oiler

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by X telephone _____ in person _____

Date 01.06.03 Time 9:48 Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- does not work w/ cp; but Rp has a hostile work envt, explicit and graphic material always present, posted, graffiti; had filed charges in 1993.
- treated cp like she was the perpetrator when she complained to Rp about it.
- works in the same dept. : Oliver Plunkett, Chief Operating Engineer. she had filed a complaint against.
- no first hand knowledge of incidents b/w cp : Davis/Kelly.

VKS

Investigator

#14A/CPFORMS Rev.2/9/99

01.06.03

Date

P1411

Witness Statement Form

Re: Charge No.: 2002CN2680/2683

Complainant: Delores D. Ammons

Respondent: Davis/Kelly

Witness Name: Donna Watson

EEO Category: (female)

Witness Address: _____

Tel.No.: () (773) 721-6298

Title/position of witness: Painter.

(e.g. witness worked with Complainant as a packer on the same assembly line, same shift.)

Interviewed witness by X telephone _____ in person

Date 01.06. Time 10:27. Location (if in person) _____

Indicated below are the relevant facts obtained from above named witness (continued on attached lined paper if more space needed.)

- off on medical leave when incident occurred
- work env't extremely hostile; the men/mgmt. do not want women to work there; mgmt allows men to succeed, get promotions, etc. but women are treated differently; women not wanted there; male dominated work env't.
- women labeled as troublemakers for making legitimate complaints
- graphic/explicit material posted; "ball breaking" jokes; never had an incident w/ Davis/Kelly; graphic material such as magazines, posters, calendars.
- urinated near the men's washrooms; they would urinate right in front of her despite posting signs;

VHS

Investigator

#14A/CPFORMS Rev.2/9/99

01.06.03

Date

P1410