E-FILED Tuesday, 24 September, 2019 05:43:56 PM Clerk, U.S. District Court, ILCD

## Exhibit 1

This form is affected by the Privacy Act of 1974: See Privacy act statemet before completing this form. # 18W0220.16	ent AGENCI	2018SF2	2877
Illinois Department of Hu	uman Rights and	EEOC	
NAME OF COMPLAINAN'T		TELEPHONE N	UMBER (include area coo
WILLIAM LAYNE ROBERTS		1	
STREET ADDRESS CITY, STATE	AND ZIP CODE	-	DATE OF BIRTH
			<u>/ /</u> <u>M D '</u>
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOY		RENTICESHIP CO	MMITTEE, STATE O
LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAIN NAME OF RESPONDENT MCLEAN COUNTY STATE'S ATTORNEY'S OFFICE	IST ME (IF MORE TH NUMBER OF EMPLOYEES, MEMBERS 15+		UMBER (include area co
	AND ZIP CODE	1	COUNTY
	GTON, ILLINO	S 61702	MCLEAN
605 CAUSE OF DISCRIMINATION BASED ON: SEXUAL HARASSMENT, RETALIATION			A/EPA) LATEST (ALI 1/29/2017
THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS	:	CONTINUING	ACTION
B. PRIMA FACIE ALLEGATION	NS		
<ol> <li>My sex is male.</li> <li>From December 2016 to Assistant State's Attorne when she contrived to iso for no work-related mattand would come into my probably thought that w and e-mails suggesting a</li> </ol>	ey, sexually harass olate me in offices ter, called me her office and make te were having sex	sed me on multi where we woul boyfriend, tried jokes that other . In addition, si	ple occasions d be alone i to kiss me, employees he sent texts
2. From December 2016 to Assistant State's Attorne when she contrived to iso for no work-related mate and would come into my	ey, sexually harass olate me in offices ter, called me her office and make te were having sex	sed me on multi where we woul boyfriend, tried jokes that other . In addition, si	ple occasions d be alone i to kiss me, employees he sent texts
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EEO-5 FORM (Rev. 11/09-INT)

Charge Number: 2018SF28. Complainant: ROBERTS Page 2 of 2

> maintaining a "friendship" on these terms that she could advance my career with the State's Attorney's Office and provide referral that might assist me outside the office, but that if we were to cease to be "friends" that it would negatively affect my career within the McLean County State's Attorney's Office.

- 3. The conduct was unwelcomed. On November 22, 2017, I opposed it to Jason Chambers, McLean County State's Attorney, but it continued.
- 4. The conduct created a hostile, intimidating, and offensive work environment that substantially interfered with my ability to perform the job.

## II. A. ISSUE/BASIS DISCHARGE ON NOVEMBER 29, 2017, BECAUSE OF RETALIATION.

## B. PRIMA FACIE ALLEGATIONS

- 1. On November 22, 2017, I opposed discrimination to Respondent when complaining about sexual harassment.
- 2. My work performance as Assistant State's Attorney met Respondent's expectations.
- 3. On November 29, 2017, Respondent discharged me for no stated reason.
- 4. The discharge followed my participation in a protected activity within such a period of time as to raise an inference of retaliatory motivation.