

I. A. ISSUES/BASIS

Sex Discrimination

B. PRIMA FACIE ALLEGATIONS

1. From December 2014 until September 2018 Complainant worked as a patrol officer and most recently a detective for the Watseka Police Department.
2. In approximately 2015, Complainant was with Chief Jeremy Douglas at the Iroquois County Jail Deputy's Room. Chief Douglas placed his hands inside Complainant's uniform blouse on the straps of her vest and grabbed and rubbed up and down against Complainant's chest. [REDACTED] observed the Chief's actions and stated that his conduct was not appropriate.
3. In approximately January 2015, Complainant was sitting at her desk in the break room during a shift change. Chief Douglas entered the room and asked Complainant, "Stand up so I can look at your ass."
4. In the Fall of 2015, Complainant worked the afternoon shift, which was from 2:00 p.m. to 10:00 p.m. Approximately once a week for a period of six months, the Chief would rub Complainant's shoulders during the shift change. Chief Douglas advised Complainant that he was a "touchy feely person." On one occasion, Chief Douglas placed his face near Complainant's head and stated, "you smell good." Officer Hall observed Chief Douglas and asked, "are you going to smell me next?"
5. From 2016 through September 2018, Chief Douglas would rub Complainant's shoulders approximately every other month. Complainant repeatedly told the Chief not to touch her, but he would not listen.
6. In 2017, Chief Douglas wrongly accused Complainant of sleeping with Officer Vincent Laffon. Chief Douglas further stated to Complainant that when she and Officer Laffon would have sex, he would not call out the wrong name during sex since his wife's name is also
7. In September 2017, before the 911 memorial event, Chief Douglas stated to Complainant, "don't wear the yoga pants because the little boys won't be able to keep it in their pants."

8. In January, 2018, Complainant was involved in an arson investigation with the State Fire Marshall's Office. While she was taking notes during an investigator's interview of a witness, Chief Douglas approached her from behind and placed both of his hands on the sides of her neck. Later that day Chief Douglas told Complainant the firemen told him they were sad she changed from her yoga pants to jeans.
9. Sometime between May 25 and May 29, 2018, outside the Iroquois County Courthouse Museum, Chief Douglas asked Complainant, "So are you fucking Justin Moyer?"
10. In May or June of 2018 Complainant attended the wake of Officer Muench's girlfriend. At the wake Chief Douglas commented on how "good" Complainant's "ass looked in those pants," which was said in front of several police officers.
11. From December 2014 through September 2018, Chief Douglas would ask Complainant at least twice a month "who she was "fucking".
12. In September 2018, Complainant believed she was forced to leave her job as a result of the constant and continuous sexual assaults and harassment by Chief Douglas.
13. The aforementioned facts created a sexually hostile environment.

II. Retaliation

14. Complainant reasserts and realleges the facts in paragraphs 1 through 13.
15. From 2016 through September 2018, Chief Douglas would rub Complainant's shoulders approximately every other month. Complainant repeatedly told the Chief: "I don't like being touched and please don't touch me."
16. From December 2014 through September 2018, Chief Douglas would ask Complainant at least twice a month "who am I fucking". Complainant repeatedly told the Chief that her personal life was none of his business.
17. On or about September 7, 2018, after enduring monthly panic attacks and constant nightmares caused by the aforementioned conduct of Chief Douglas, Complainant found her working conditions intolerable, which forced her involuntary resignation.