

**STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS
INVESTIGATION REPORT**

Complainant: Ashley Butt

IDHR No.: 2019SE3039

Respondent: The City of Watseka¹

EEOC No.: 440-2019-04268

Investigator: RBB

Supervisor: ESK

Date: 09/28/21

Issue/Basis:

Finding:

- A. Sexual Harassment/Sexual Harassment
- B. Constructive Discharge/Sexual Harassment
- C. Constructive Discharge/Retaliation

- A. Substantial Evidence
- B. Substantial Evidence
- C. Lack of Substantial Evidence

Staff Note

Complainant's charge indicates a basis of sex, female. During the investigation, it was confirmed that Complainant's allegations pertain to sexual harassment and retaliation.

Jurisdiction:

Alleged violation:

A. December 2014 to September 2018
B & C. September 14, 2018

Charge filed:

April 23, 2019

Charge perfected:

December 19, 2019

Amendments:

N/A

Number of employees:

45

Verified Response:

Note: Pursuant to Public Act 100-0492, a verified response is not required for a charge filed on or after September 8, 2017.

Employment Data:

Respondent indicated through correspondence that it employed a total of forty-five (45) employees. Respondent indicated through correspondence, that it employed approximately 7 to 9 Patrol Officers in Complainant's location.

¹ The investigation revealed that Respondent's legal name is The City of Watseka rather than Watseka Police Department as indicated in the charge.

Uncontested Facts:

1. Respondent is a municipal corporation.
2. Respondent's Police Department is comprised of members including police officers responsible to serve and protect the community.
3. Complainant was hired on December 6, 2014.
4. Between December 2014 and September 2018, Complainant was employed as a Patrolman.
5. On September 7, 2018, Complainant resigned from Respondent.

Complainant's Allegations-Count A:

Complainant, a Patrolman², alleges that from December 2014 to September 2018, she was subjected to sexual harassment (**Count A**). Complainant alleges that Jeremy Douglas, Chief, regularly made physical contact with her; said he wanted to look at her "ass"; told her she smelled good and asked if she would smell him; wrongly accused her of sleeping with Vincent Laffon, Officer, and told her that when she and Laffon would have sex, he would not call out the wrong name during sex since his wife's name was the same as hers; made comments about her clothing; and regularly asked her about her sex life, asking her who she was "fucking." Complainant alleges that Douglas conduct was unwelcomed and unwanted and that she reported the sexual harassment to the Mayor. Complainant alleges that the conduct created a work environment that became hostile and sexually offensive, affecting her ability to perform her job.

Respondent's Defenses-Count A:

Respondent's articulated non-discriminatory reason for its action is that Respondent denies that Complainant was subjected to sexual harassment. Respondent further denies that Complainant was subjected to any conduct which created a hostile, intimidating, and sexually offensive work environment which interfered with Complainant's ability to perform her job.

Investigation Summary-Count A:

A. Complainant's Evidence.

1. Complainant stated that she worked at Respondent beginning in December 2014. Complainant stated that from December 2014 through January 2015, prior to attending the police academy, she was assigned to Respondent as a Probationary Police Officer to shadow Jeremy Douglas, Chief of Police, but he was a Sergeant during that period. Complainant stated that from December 2014 through January 2015, Douglas had supervisory authority over her because she was assigned to Douglas's shifts and he was doing all her training until she left for the Police Academy.
2. Complainant stated that from December 2014 through January 2015, Douglas stated that females should not be cops. Complainant stated that on or about January

² The investigation revealed that Respondent classified Complainant's position as Patrolman, rather than Patrol Officer as indicated in the charge.

2015, he placed his right hand on the headrest behind her head and stated that he was a "touchy-feely" person. Complainant stated that Douglas discussed the personal lives of other officers with her and told her who he believed would attempt or desire a personal relationship with her. Complainant stated that his behaviors and comments made her feel uncomfortable.

3. Complainant stated that on or about January 2015, prior to the start of the police academy, she was seated at her assigned desk during a shift change in the squad room when Douglas entered and told her, "stand up so I can look at your ass." Complainant stated that she felt humiliated because there were other officers present and one of the officers quickly exited the room stating that he did not want to be involved in a lawsuit.
4. Complainant stated that on or about May 2015, she completed the police academy and returned to Respondent excited to begin her career as a Police Officer reporting to Bill Stanley, Sergeant, and Douglas who was also a Sergeant, but ranked higher than Stanley.
5. Complainant stated that her excitement of being a Police Officer quickly faded on or about the fall of 2015. Complainant stated that Douglas would enter Respondent's squad room, walk up behind her while she was seated at her assigned desk, place his hands on her shoulders and begin moving them in a rubbing motion. Complainant stated that this occurred on multiple occasions while working the second shift from 2:00 p.m. to 10:00 p.m. Complainant stated that on multiple occasions, she told Douglas that she did not like being touched and told him not to touch her and physically pulled away from him. Complainant stated that the frequency of his unwanted touching varied from weekly to every other month between the fall of 2015 and September 2018, and he was not deterred when she told him to stop and when she moved away from him.
6. Complainant stated that on or about 2015, in front of Officer Hall, Douglas smelled her hair while commenting about how good it smelled and Officer Hall asked Douglas if he was going to smell him next.
7. Complainant stated that on or about 2015, she informed Bill Stanley, Sergeant, of Douglas's actions and Stanley told her to notify Roger Lebeck, Chief of Police. Complainant stated that she was afraid that she would lose her job because she was an at-will employee between December 2014 and April 2015.
8. In an Affidavit signed April 14, 2019 (**Exhibit A**), Stanley wrote that Complainant was assigned to him during her field training program from March 2015 to April 2015. Stanley stated that early in the program, Complainant told him that Douglas had asked to see her ass. Stanley stated that he was surprised to hear that and asked for an explanation. Stanley stated that Complainant told him that she walked to the squad room in uniform and Douglas asked her to turn around so that he could see how her ass looked. Stanley stated that he told Complainant to report it to Chief Lebeck. Stanley stated that Complainant told him that she did not want to because

she was afraid of being let go during her probationary period. Stanley wrote that it was common for Douglas and a Lieutenant to use vulgar language like “cunt” and “pussy” in front of Complainant. Stanley stated that on one occasion, he spoke to him about it, but Douglas told him that Complainant was fine with it.

9. Stanley's Affidavit (**Exhibit A**) states that it was common for Douglas to make comments about Complainant's yoga pants and would let the other officers know if she was out cutting her grass so that they could go check her out. Stanley stated that he heard Douglas ask Complainant if he was “fucking” someone, but he did not hear the name. Stanley stated that he again told her to speak to Chief Lebeck but Complainant told him that she did not want to create any waves while she was on probation. Stanley stated that he saw Douglas rub Complainant's shoulders and Complainant dip down, pull away from him and tell him not to touch her. Stanley stated that after a funeral of fellow employee's friend, Douglas told him that Complainant looked “hot as hell” in what she wore to the funeral and continued to talk about how she looked constantly for months.
10. Stanley's Affidavit (**Exhibit A**) states that at one point word got out to Douglas that Complainant was looking for jobs elsewhere, so she was appointed to Detective. Stanley stated that was not the only reason she was promoted because she was hard working and intelligent, but he told Douglas that she was not the best choice because she was applying to other positions. Stanley stated that Douglas told him that Complainant was not going anywhere because she was “his.” Stanley stated that it was a common attitude of Douglas to see Complainant as property and not a person.
11. Complainant stated that on or about 2015, she was in the Iroquois County Jail in the Deputy's room with Douglas Brenner, Deputy of Iroquois County Sheriff's Office, and Douglas. Complainant stated that Douglas placed his hands inside of her uniform blouse, grabbed onto the straps of her inner duty vest and rubbed his hands up and down. Complainant stated that due to the fit of her duty vest, Douglas's hands touched her chest. Complainant stated that the incident was dehumanizing, and she was shocked, embarrassed and violated. Complainant stated that Brenner told Douglas that his behavior was inappropriate, and Douglas replied by asking him whether it would have been okay if he would have asked her to stand up so that he could look at her ass. In an Affidavit signed April 18, 2019 (**Exhibit B**), Brenner stated that he, Douglas and Complainant were talking in the Corrections Office and he does not know how the conversation started but Douglas made a comment about how Complainant's vest fit. Brenner stated that Douglas went up to Complainant from the side and reached his right hand into the left armhole of Complainant's external carrier and slid his hand up and down the opening holding on to the vest carrier material and making a comment about the fit of her vest as he did that. Brenner stated that he immediately asked Douglas what he was doing and told him that he could not do that. Brenner stated that Douglas laughed after he confronted him and said that it was okay because he had her stand up and show him and others how her pants made her butt look. Brenner stated that he was shocked and walked out of the room.

12. Complainant stated that on or about April 2016 or May 2016, Lebeck retired and Douglas became the Chief of Police and was the first in command. Complainant stated that Douglas reported to Bob Harwood, Mayor.
13. Complainant stated that on or about 2016, while at work in the police department, Douglas consistently asked her questions about her personal life by asking if she was going to roll out of bed with Officer Muench to go to court the following morning. Complainant stated that she was stunned by his question. Complainant stated that on or about 2016, Douglas started a conversation with her about the rumors that he had created about her personal life and told her that no one would believe the rumors, but she believes that due to his ongoing comments to her and the rumors that he created, her character was defamed.
14. Complainant stated that on or about March 3, 2016, while exiting Patrolman Michael Stua's father's wake, Douglas told her that Stua was going to try and "fuck" her again. In an Affidavit signed April 18, 2019 (**Exhibit C**), Stua wrote that on or about 2015, he was called into Douglas' office about Complainant's performance and during that meeting he warned him to be careful with Complainant because she was the type of person that would claim sexual harassment. Stua stated that one morning during shift change, Douglas walked behind Complainant who was seated at her desk, smelled her hair and commented that it smelled good. Stua stated that on another morning he witnessed Douglas ask Complainant to stand up and turn around so he could see how her butt looked in the uniform pants. Stua stated that he witnessed Douglas on one occasion rub Complainant's shoulders. Stua stated that after he, Complainant, Douglas and other officers attended a funeral, he witnessed Douglas high fiving officers and stating that Complainant does not like to be touched.
15. Complainant stated that on or about March 2016, while in the squad room at Respondent, in the presence of Stua, Officer Joshua Heeren, Patrolman and Muench, Douglas mentioned that Stua was going to try and fuck her again. Complainant stated that she told him that if anyone wants a private conversation with Douglas, it will not happen because he tells everyone what has been said. Complainant stated that she mentioned that the perception that she was involved with Patrolman Ryan Garfield was based on Douglas's assumptions about her. Complainant stated that those statements she made were later documented as truthfulness statements, in support of an accusation of insubordination against her.
16. Complainant stated that on or about March 2016, she had a meeting with Bob Harwood, Mayor, in the presence of Douglas. Complainant stated that she saw that the statements she had made about Douglas were documented and they punished her for insubordination based on the statements she had made about Douglas. Complainant stated that she told Harwood about the unwanted touching and inappropriate comments that Douglas had been making. Complainant stated that Harwood interrupted her, told her that she needed counseling and dismissed her from his office. Complainant stated that she followed policy and procedure attempting to report the sexual harassment that she was experiencing but Harwood

failed to act on the allegations. Complainant stated that Douglas was trying to have her terminated for reporting his inappropriate behaviors and comments.

17. Complainant stated that on or about 2017, while in the squad room at Respondent, Douglas told her that Vincent Laffoon, Patrolman, would not call her out by the wrong name while having intercourse with her because his wife has the same name as her. Complainant stated that Douglas continued to make inappropriate comments to her throughout her career and told her multiple times, "you are either with me or against me." Complainant stated that anyone that spoke up regarding his inappropriate actions would be "blackballed," and he would terrorize people into submission.
18. Complainant stated that on or about September 2017, prior to a 911 memorial event at Watseka Community High School, Douglas told her not to wear yoga pants because the little boys would not be able to "keep it in their pants."
19. Complainant stated that on or about January 5, 2018, while assisting the State Fire Marshall by documenting a statement by a witness on a possible Arson investigation, Douglas entered the room behind her and placed his hands on the back of her neck. Complainant stated that Douglas told her that the firemen were sad that she had changed her pants. Complainant stated that his comment was referencing the fact that when she arrived at the fire station, she was wearing yoga pants but when she was notified that she needed to conduct interviews, she went home to change into a different attire.
20. Complainant stated that on or about Spring of 2018, she told Jeff Burke, Fraternal Order of Police (FOP) Attorney, about the unwanted physical contact by Douglas and his sexually charged comments and rumors. Complainant stated that Burke's response was that he had known Douglas for years and he was not aware that Douglas was doing what she said he was. Complainant stated that Burke told her that she needed to speak to a different attorney but did not provide any guidance as to where to file a complaint against Douglas.
21. Complainant stated that that on or about May 25, 2018, while standing outside of the Iroquois County Courthouse Museum, Douglas blatantly asked her if she was "fucking" Justin Moyer, Patrolman. Complainant stated that throughout her employment at Respondent until her resignation in September 2018³, Douglas always asked her who she was having sexual relations with.
22. Complainant stated that she was not aware of any other allegations of sexual harassment against Douglas.

B. Respondent's Evidence.

1. Jeremy Douglas, Chief of Police, stated that Complainant was hired as a Probationary Police Officer at Respondent on or about December 2014, reporting

³ See Counts B & C.

to Bill Stanley, Sergeant. Douglas stated that Complainant completed her probationary period on or about April 2015, and received an evaluation of completion. Respondent's Evaluation to Complainant dated April 22, 2015, **(Exhibit D)** indicates that Complainant exhibited the knowledge and skills to complete her assignments and has shown competence and commitment to handle calls without support.

2. Respondent's Sexual and Other Unlawful Harassment Policy **(Exhibit E)** indicates that it is the policy of Respondent to provide a productive work environment and not to tolerate verbal or physical conduct and any employee that harasses, disrupts or interferes with another person's work performance or that creates an intimidating, offensive or hostile work environment. Douglas stated that internal complaints of harassment are investigated by him and/or John Allhands, Mayor.
3. Douglas stated that Respondent prohibited sexual harassment. Douglas stated that he made sure that all the employees signed off on the sexual harassment policy. An Acknowledgement of Sexual Harassment Policy Dated March 8, 2016 by Douglas **(Exhibit F)** and signed by Complainant.
4. Respondent's Illinois Fraternal Order of Police and Respondent Patrol, Sergeants and Lieutenants Harassment Under Article 5 Grievance Procedure **(Exhibit G)** indicates that a grievance is defined as a dispute or difference of opinion raised by an employee of the Union raised against the City involving an alleged violation of an express provision of the agreement. The policy indicates that a grievance must be raised within 15 days after the grievant knew or should have known of the event and the grievance should be processed as follows; step 1 Chief of Police, step 2 Mayor if the answer of the Chief of Police is not acceptable and step 3 Arbitration if the grievance is not resolved in step 2, and the Union wishes to appeal the grievance.
5. Douglas stated that he did not sexually harass Complainant and denies all of the allegations that she has made against him. Douglas stated that he patted Complainant on her back, like he did to all the officers, but did not make other contact with her. Douglas stated that he did not treat Complainant any differently than the male officers.
6. Douglas stated that between December 2014 through January 2015, he did not rub Complainant's shoulders or ask her who she was "fucking," but he did pat Complainant on her back.
7. Douglas stated that on or about March 2016, Stanley brought to his attention that he was making Complainant feel uncomfortable. Douglas stated that he did not know that he was making her feel uncomfortable. Douglas stated that on or about March 2016, he and Complainant were working together, and he approached her to discuss what Stanley had told him. Douglas stated that he told her that he wished she had told him that he was making her feel uncomfortable because he did not want her to ever feel victimized.

8. Douglas stated that between on or about 2016 and September 2018, he did not ask Complainant personal questions and did not make comments about her body or sex life during a wake. Douglas stated that Complainant's allegations never happened.
9. Douglas stated that on or about March 6, 2016, it was brought to his attention that Complainant was making controversial statements about him. Douglas stating that he was told that she was saying that he was a liar because he was stating that she was "fucking" another officer. Douglas stated that he did believe it was insubordination that she was speaking poorly about him. Douglas stated that on or about March 8, 2016, Complainant received a written reprimand for insubordination as a result of the comments that she made about him. Douglas stated that she accepted the disciplinary action and did not file a grievance.
10. Douglas stated that he met with Complainant and Mayor Harwood about the controversial statements Complainant had made and Complainant did not report sexual harassment in any meeting.
11. Douglas stated that on or about September 2017 during a 9/11 memorial Event, Complainant asked him if there was a dress code for the event. Douglas stated that he told Complainant that she could wear her uniform or dress casual. Douglas stated that Complainant told him, "so no yoga pants." And that he told her, "no yoga pants."
12. Douglas stated that he did not make any comments about boys "keeping it in their pants." Douglas stated that a firefighter came up to him when Complainant was returning to a scene and told him that they were all disappointed because she had to go home and change. Douglas stated that he only said to Complainant that she got him in trouble with the firefighters because they thought he made Complainant go home and change her clothes.
13. Douglas stated that between December 2014 and September 2018, Complainant did not file a complaint of sexual harassment.
14. Douglas stated that on or about November 2018 or December 2018, after Complainant no longer worked at Respondent, he was told that she had alleged incidents of sexual harassment to Respondent, and they were going to conduct an internal investigation.
15. Douglas stated that on or about December 2018 or January 2019, he was issued a 15-day suspension and completed sexual harassment training as a mutual agreement. Memorandum of Agreement Signed by Douglas on January 29, 2019 **(Exhibit I)** indicates that the City of Watseka by and through its Mayor, John Allhands and Douglas, agreed to resolve any and all matters of controversy arising out of or relating to investigation into complaints of a sexually hostile work environment in the Department.

C. **Complainant's Rebuttal.**

1. Complainant stated that Douglas was her Chief and her boss, and because he was first in command, she was afraid to lose her job.

Analysis:

The investigation revealed that Respondent prohibits sexual harassment. The investigation revealed that Jeremy Douglas, Chief of Police, had supervisory authority over Complainant. Complainant alleges that she was subjected to sexual harassment from Douglas from December 2014 through September 2018, when he placed his hands inside Complainant's uniform blouse on the straps of her vest and rubbed up and down against her chest; asked her to stand up so he could look at her "ass," rubbed her shoulders on multiple occasions and continued to even when she pulled away; told her that he was a touchy-feely person; placed his face near her head and told her that she smelled good; told her not to wear yoga pants because little boys would not be able to keep it in their pants; approached her from behind and placed both of his hands on the sides of her neck; and frequently asked her about her sex life and who she was "fucking." Douglas denies that he sexually harassed Complainant and contends that he only patted her back like he did to other officers. Complainant alleges on or about March 2016 and Spring of 2018, she verbally reported sexual harassment from Douglas, which Respondent denies. Respondent contends that Complainant filed a complaint of sexual harassment against Douglas after she resigned from Respondent in September 2018, and Respondent investigated. The investigation revealed that Douglas was issued a fifteen-day suspension and underwent sexual harassment training following the investigation. Respondent contends that there have been no other complaints of sexual harassment.

Findings and Conclusion-Count A:

A finding of substantial evidence is recommended because

The evidence shows that Respondent prohibits sexual harassment. Complainant alleges and Respondent denies that she was subjected to sexual harassment from Jeremy Douglas, Chief. Complainant alleges on or about March 2016 and Spring of 2018, she verbally reported sexual harassment against Douglas, which Respondent denies. Respondent contends that Complainant filed a complaint of sexual harassment against Douglas after she resigned from Respondent and Respondent investigated. The evidence shows that Douglas was issued a fifteen-day suspension and underwent sexual harassment training. There is conflicting testimony between Complainant and Respondent regarding conduct which could be severe and pervasive as to rise to the level of sexual harassment. As the alleged harasser was a supervisory employee, Respondent is strictly liable for the conduct. Therefore, this case is recommended to be heard by trier of fact.

Complainant's Allegations-Counts B & C:

Complainant, a Patrolman, alleges that on September 14, 2018, she was subjected to a constructive discharge because of sexual harassment (**Count B**) and in retaliation for opposing sexual harassment (**Count C**). Complainant alleges that between December 2014 through September 2018, she engaged in a protected activity when she opposed sexual harassment by Jeremy Douglas, Chief of Police. Complainant alleges that due to the sexual harassment that she experienced during

her employment, she concluded that Respondent did not want her employed and constructed a work environment so hostile and intolerable that no reasonable minded person could continue to work effectively within such an environment. Complainant alleges that consequently she had no other alternative but to resign from Respondent on September 14, 2018.

Respondent's Defenses-Counts B & C:

Respondent's articulated non-discriminatory reason for its action is that Complainant voluntarily resigned her employment effective September 14, 2018.

Investigation Summary-Counts B & C:

A. Complainant's Evidence.

1. See Complainant's Evidence, Count A.
2. Complainant stated that after she reported sexual harassment⁴ in March 2016, Douglas continued to sexually harass her. Complainant stated that in the spring of 2018, the work environment had become intolerable for her because she had to continue working with Douglas and at least every other month, he would rub her shoulders. Complainant stated that she continued to repeatedly tell him not to touch her, that she did not like to be touched, but he did not stop.
3. Complainant stated that her complaints and cries for help to Respondent were neglected and she was made to feel like she was at fault. Complainant stated that it was unbearable to know that the people in a position of power that she reported Douglas conduct to help her, such as Burke and Harwood, did not believe her.
4. Complainant stated that after enduring the monthly panic attacks and constant nightmares caused by Douglas' sexual harassment, her working environment had become intolerable that on or about August 31, 2018, she was forced to submit her resignation in writing, effective September 14, 2018.
5. Complainant stated that on or about September 2018, after she submitted her resignation, Douglas tried to convince her to stay at Respondent by telling her that she would be the next sergeant.

B. Respondent's Evidence.

1. See Respondent's Evidence, Count A.
2. Respondent's Sexual and Other Unlawful Harassment Policy (**Exhibit E**) indicates that Respondent prohibits any form of retaliation against employees for bringing complaints or providing information about harassment.

⁴ See Count A

3. Douglas stated that on August 31, 2018, Complainant submitted her resignation in writing effective September 14, 2018. Complainant's Resignation Letter dated August 31, 2018 (**Exhibit H**), indicates that she was submitting her resignation effective September 14, 2018.
4. Douglas stated that in or about 2018, he overheard discussions by other officers that Complainant was applying to other positions outside of Respondent. Douglas stated that he asked Complainant if that was true because he was going to be short an officer. Douglas stated that he did not try to convince Complainant to stay. Douglas stated that when an officer wants to leave Respondent, he does not try and talk them into staying, he wishes them the best.
5. Douglas stated that he gave Complainant a good recommendation with Rantoul Police Department when they showed up at Respondent asking about her.

C. **Complainant's Rebuttal.**

1. Complainant stated that the sexual harassment that she endured for over three years was so intolerable and her cries for help went unheard, that she had no choice but to resign, and as a result she lost four years of service.

Analysis:

The investigation revealed that Respondent prohibits sexual harassment and retaliation. Complainant alleges that she was sexually harassed between December 2014 and September 2018, which Respondent denies. Complainant alleges on or about March 2016 and Spring of 2018, she verbally reported the sexual harassment against Jeremy Douglas, Chief, which Respondent denies. Respondent contends that Complainant did not file a complaint of sexual harassment against Douglas until on or about November 2018, after she resigned from Respondent. The investigation revealed that Complainant submitted her resignation effective September 14, 2018. Complainant alleges that the work environment had become intolerable for her, and did not improve despite her complaints, which Respondent denies.

Findings and Conclusion-Count B:

A finding of substantial evidence is recommended because

The evidence shows that Respondent prohibits sexual harassment. Complainant alleges and Respondent denies that she was subjected to sexual harassment between December 2014 and September 2018. The evidence shows that Complainant submitted her resignation effective September 14, 2018. There is conflicting testimony between Complainant and Respondent regarding conduct which could rise to the level of sexual harassment, and the circumstances surrounding Complainant's resignation. There is conflicting testimony as to whether Complainant was subjected to a constructive discharge brought forth by an intolerable work environment due to sexual harassment. Therefore, this count is recommended to be heard by trier of fact.

Findings and Conclusion-Count C:

A finding of lack of substantial evidence is recommended because

The evidence shows that Respondent prohibits retaliation. Complainant alleges on or about March 2016 and Spring of 2018, she verbally reported sexual harassment against Douglas, which Respondent denies. The evidence shows that Complainant submitted her resignation effective September 14, 2018. There is no evidence of a retaliatory pretext as the evidence shows that Douglas' alleged behavior remained unchanged in its frequency and/or severity after Complainant's alleged complaints. There is no substantial evidence that Complainant was constructively discharged in retaliation.

Witness List:

For Complainant:

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FFC

Exhibits:

- A. Stanley Statement Affidavit
- B. Brenner Statement Affidavit
- C. Stua Statement Affidavit
- D. Respondent's Evaluation to Complainant
- E. Respondent's Sexual and Other Unlawful Harassment Policy

- F. Acknowledgement of Sexual Harassment Policy from Douglas to Complainant Signed March 8, 2016
- G. Respondent's Illinois Fraternal Order of Police and Respondent Patrol, Sergeants and Lieutenants Harassment Under Article 5 Grievance Procedure
- H. Complainant Resignation Dated August 31, 2018
- I. Memorandum of Agreement