

**THE HAYBER LAW FIRM, LLC**  
*EMPLOYEE RIGHTS ADVOCATES*

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April 21, 2010

Via FedEx # 7934 6719 9278

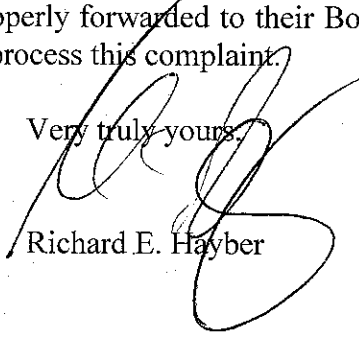
State of Connecticut  
Connecticut CHRO  
West Central Region Office  
55 West Main Street, Suite 210  
Waterbury CT 06702

Re: Hundley V. ESPN

Greetings:

Our firm represents Brooke Hundley with regard to her allegations of illegal discrimination in the workplace. Enclosed is her complaint and affidavit of illegal discrimination along with other required documents. Please make sure that a copy is properly forwarded to their Boston office. Please let me know if there is anything else you need to process this complaint.

Very truly yours,

  
Richard E. Hayber

Encl. Complaint

Cc: Brooke Hundley

STATE OF CONNECTICUT  
Commission on Human Rights & Opportunities

APPEARANCE

Brooke Hundley,

COMPLAINANT

CHRO NO.:

VS.

EEOC NO.:

ESPN Productions, Inc.

RESPONDENT

PLEASE ENTER THE APPEARANCE OF:

The Hayber Law Firm, LLC  
221 Main Street Suite 502  
Hartford, CT 06106

Tel.: 860-522-8888  
Fax: 860-218-9555  
Juris No: 426871

In the above-entitled case for

- The Complainant.
- All Complainants.
- The following Complainant(s) only: \_\_\_\_\_
- The Respondent.
- All Respondents.
- The following Respondent(s) only: \_\_\_\_\_

**Note:** If other counsel have already appeared for the party or parties indicated above, please state whether this appearance is

- In lieu of appearance of attorney of firm (name) \_\_\_\_\_ already on file
- OR
- In addition to appearance already on file.

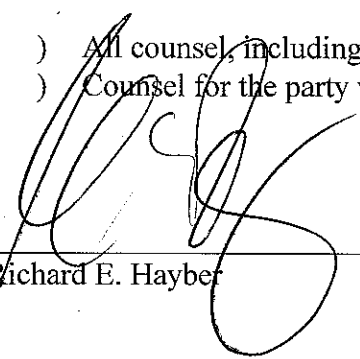
  
Richard E. Hayber

4-21-10  
Date

**CERTIFICATION**

I hereby certify that a copy of the above was mailed/delivered to:

- ( ) All counsel, including Commission Representatives and pro se parties of record.
- ( ) Counsel for the party whose appearance is to be replaced (for in lieu of appearance).



---

Richard E. Hayber

4-21-10

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Date Copies  
Mailed/Delivered

Wendi J. Kemp  
ESPN  
ESPN Plaza  
Bristol CT 06010

CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

Date: April 20, 2010

CHRO No.:

EEOC No.:

My name is Brooke Hundley and I reside at 700 Riverside Drive, Apartment 5D, New York, NY 10031

The Respondent is ESPN Productions Inc. whose business address is ESPN Plaza, Bristol, CT 06010

I was

- ( ) denied reasonable accommodation on the basis of a disability on or about \_\_\_\_\_ and was (X) terminated on or about October 26, 2009 ( ) suspended on or about \_\_\_\_\_
( ) laid off on or about \_\_\_\_\_ ( ) not recalled on or about \_\_\_\_\_
( ) demoted on or about \_\_\_\_\_ ( ) harassed on or about \_\_\_\_\_
( ) poorly evaluated on or about \_\_\_\_\_ ( ) warned on or about \_\_\_\_\_
\_\_\_\_\_ ( ) sexually harassed on or about \_\_\_\_\_ ( ) denied a raise on or about \_\_\_\_\_
( ) earning unequal pay on or about \_\_\_\_\_ ( ) transferred on or about \_\_\_\_\_
( ) retaliated against on the basis of my participation in a civil rights issue on or about \_\_\_\_\_
( ) delegated unequal duties on or about \_\_\_\_\_ ( ) not hired on or about \_\_\_\_\_
( ) placed on probation on or about \_\_\_\_\_ ( ) not promoted on or about \_\_\_\_\_
( ) given reduced hours on or about \_\_\_\_\_ ( ) less trained on or about \_\_\_\_\_
\_\_\_\_\_ ( ) denied equal services on or about \_\_\_\_\_ ( ) other \_\_\_\_\_ on or about \_\_\_\_\_

and believe that my

- ( ) race ( ) age ( ) marital status ( )

- color (\_\_\_\_\_)
  - alienage(\_\_\_\_\_)
  - sex (\_\_\_\_)
  - pregnancy
  - national origin (\_\_\_\_\_)
  - sexual orientation (\_\_\_\_\_)
  - ancestry (\_\_\_\_\_)
  - religion/creed (\_\_\_\_\_)
  - prior criminal record
  - physical disability (\_\_\_\_\_)
  - having previously opposed mental disability/disorder (\_\_\_\_\_)
- discriminatory conduct

**was/were in part a factor(s) in this action. I believe that the respondent violated the following Connecticut General Statutes and Acts listed below:**

- 46a-58 (a)     46a-60 (a)(1)     46a-60 (a)(4)     46a-60 (a)(7)     46a-75
- 46a-64 (a)     46a-81 ( ) ( )     46a-80     46a-60 (a)(8) ( ) ( )
- 46a-70 ( )
- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 20003 and the Civil Rights Act of 1991; { 15 or more employees }
- Age Discrimination in Employment Act of 1967, 29 U.S.C. 621-634 {20 or more employees}
- Americans With Disabilities Act 42 U.S.C. 12101 et seq.

- Equal Pay Act of 1964, 29 U.S.C. 206
- Other \_\_\_\_\_

I provide the following particulars:

See Enclosed.

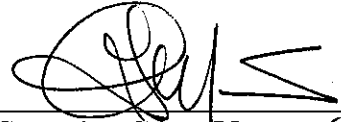
I request the Connecticut Commission on Human Rights and Opportunities investigate my complaint, secure for me my rights as guaranteed to me under the above cited laws and secure for me any remedy to which I may be entitled.


Brooke Hundley, being duly sworn an oath, states that she is the Complainant herein; that she has read the foregoing complaint and knows the content thereof; that the

same is true of her own knowledge, except as to the matter herein stated on information and belief and that as to these matters she believes the same to be true.

Dated at Hartford, Connecticut this 20<sup>th</sup> day of April, 2010.  
NEW YORK, NEW YORK

Subscribed to and sworn before me this 20<sup>th</sup> day of April, 2010.



\_\_\_\_\_  
Commissioner of the Superior Court Notary   
Public

**GLADYS MORENO**  
Notary Public - State of New York  
No. 01MO6173834  
Qualified in New York County  
My Commission Expires Sept. 04, 2011

2

Form  
103

Revised  
1/1/96

## AFFIDAVIT OF ILLEGAL DISCRIMINATION

1. Defendant, ESPN Productions, Inc., is a corporation organized and existing under the laws of the state of Delaware with its principal place of business in Bristol, Connecticut.
2. I commenced employment with Defendant on September 29, 2008. My title was Remote Production Assistant assigned to the Event Production department. I was paid \$10.96 per hour. I was twenty-one years old at the time.
3. In or around 2005, ESPN hired Steve Phillips, the former General Manager for the New York Mets as baseball analyst and announcer.
4. In or around July 2009, Mr. Phillips introduced himself to me at the Major League Baseball All-Star weekend in St. Louis, Missouri. He was in his late 40s at the time.
5. Arising out of this meeting, there commenced a sequence of events which later led to an investigation by ESPN. That investigation addressed allegations by Phillips against me, and by me against Phillips, including allegations of unwanted sexual advances, arising out of conduct by Phillips in his capacity as an employee or agent of ESPN.
6. I participated in this investigation both by meeting with ESPN human resources personnel on or around Thursday August 20, 2009 and by providing a subsequent written statement, which I forwarded to HR the next morning. In these statements, I made certain allegations against Mr. Phillips.
7. In response to the receipt of my written statement, on or around Tuesday August 25, 2009, ESPN requested to meet with me again. I indicated that I could not do so at that time on advice of counsel because I was attempting to resolve matters with Mr. Phillips.
8. On or around September 15, 2009, Mr. Phillips and I entered into a Settlement Agreement and General Release to resolve any differences which may have existed between us.
9. ESPN indicated that it would close its investigation if the parties (Mr. Phillips and I) would sign retractions of the allegations that we had made against each other. It also insisted that it be released of any and all liability arising out of the incidents.
10. On or around Wednesday, September 16, 2009, ESPN informed me that its investigation was closed. In an email from Vice President of Human Resources Douglas G. Adkins, he wrote "With your retraction, we conclude our review of this matter." I was allowed to resume my duties because of my retraction, so long as Mr. Phillips and I avoided contact with each other beyond what was necessary to do our respective jobs, "including verbal and written communications such as notes, texts and emails."
11. ESPN made these representations, i.e., that its investigation was closed and that I could return to work in order to be relieved of its obligation to investigate my allegations about Phillips' misconduct and to obtain a release of its legal liability which may have arisen out of those events. In the recent past, at least one other female Production Assistant had made a complaint of sexual harassment against a male superior.
12. I believed and understood that by closing its investigation, ESPN would no longer require me to submit to another interview as it had requested on or about August 25, 2009. In reliance on this condition, I retracted my allegations against Mr. Phillips.

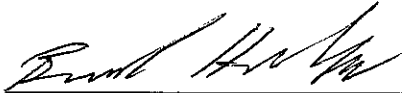
13. As a result of my retraction as described above, ESPN, on or around September 16, 2009, closed its investigation of these matters.
14. I relied on these statements by ESPN not pursuing my allegations and by my returning to work. I complied with ESPN's directive and avoided contact with Mr. Phillips.
15. After it closed its investigation, ESPN did not request me to come in for the re-interview that it demanded on August 25, 2009.
16. On or around Wednesday, October 21, 2009, the New York Post published an article about Mr. Phillips and me which provided some of the detail of the events which led to ESPN's investigation as described above.
17. The article, entitled: "Steve Phillips in foul affair with production assistant" characterized me as a "dumped mistress" who had a "'Fatal Attraction' freakout."
18. This article was based largely on statements given by Phillips to the Wilton, Connecticut police.
19. The internet article included links to Phillips' statement to the police.
20. One portion of the police report was that of Officer Steven Rangel who was told by Marni Phillips that her husband "has been having numerous affairs." Officer Rangel informed Mrs. Phillips that "nothing criminal had occurred at this time,..."
21. Mr. Phillips included intentionally false statements to the Wilton police in order to portray me as a danger to his family and to portray himself as an innocent victim.
22. Mr. Phillips' made false statements to the Wilton Police, included generally that he was the one who, since the end of July 2009, was trying to end the relationship with me. In fact, he was not trying to end the relationship and there was concrete evidence on this point.
23. ESPN, during its investigation, had asked me if this fact were true, i.e., that Phillips was trying to end the relationship. I responded that it was not true and showed ESPN text messages on my phone that proved that Phillips continued to pursue me as late as mid-August, 2009. ESPN's human resources office, including Doug Adkins and Donna Hricisko, took notes of these text messages during this meeting with me and seemed satisfied.
24. Phillips' statements to the police about me were false and ESPN knew or should have known that they were false.
25. On or around Friday, October 23, 2009, I was asked to meet with Doug Adkins and Donna Hricisko of ESPN's Human Resources Department. During this meeting, Mr. Adkins informed me that I was being put on paid administrative leave. Adkins said that I was being put on leave because of the recent publicity, and that they should "give it a few days to die down" and that he "had a few things to look into." I asked for more details but was told by Adkins that he did not have all the details at that time and that he did not feel comfortable discussing it with me at that time. He also said that they would "discuss it more on Monday."
26. Shortly after that meeting, I received a call at my home from the New York Post. The reporter stated that she had just heard that I had been put on administrative leave.
27. I called Hricisko to complain about the fact that the New York Post had just called me and that there must be some leak at ESPN. Hricisko told me that myself, Hricisko and Adkins were the only people who knew that I had been placed on leave. ESPN was the



sole custodian of this information at this time and therefore must have been the source of this leak.

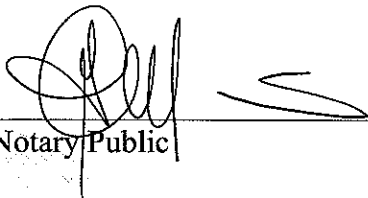
28. On or around Monday, October 26, 2009, at approximately 9 a.m., I attended a meeting with Adkins and Hricisko at their request.
29. During this meeting, Adkins stated that I was being terminated effective immediately for "misconduct", "including but not limited to failure to fully cooperate with the investigation. This decision is final and not open to debate."
30. I asked Adkins if I could be provided the details of all the reasons for my discharge. He responded: "we'll see."
31. I was escorted from the building immediately.
32. Upon information and belief, Adkins discussed this reason for my termination with other ESPN employees and / or agents, including but not limited to Hricisko and others, and in this way, published this statement about me.
33. Further, ESPN published this statement in a letter to me, with carbon copy to my personnel file, which stated: "As a follow up to our meeting on Monday, October 26, 2009 you were separated from employment due to misconduct."
34. In an interview with the Associated Press which was published on or around November 12, 2009, ESPN said that its "investigation found Hundley's characterization of the events [to be] inconsistent."
35. In fact, I had fully cooperated with the investigation. I had met with ESPN human resources personnel and answered all of their questions up to and including the date the investigation was closed by ESPN on September 16, 2009. I also provided a follow up written statement to Donna Hricisko.
36. My statements during the investigation were not "inconsistent" but were true and fully consistent with each other and with the evidence. I also provided the names of witnesses who could verify my statements. Those witnesses were never questioned by ESPN.
37. ESPN's conduct in terminating me for alleged "misconduct", including but not limited to failing to "fully cooperate" in the investigation, was false and was simply pretext for retaliation for my complaint of sexual harassment against Steve Phillips.
38. As a direct and proximate result of Defendant's retaliation, I have lost my job, lost subsequent job opportunities, and have been harassed by the public as a result of the ensuing publicity. I have suffered damages including but not limited to lost wages and benefits, emotional distress, mental anguish, damage to my reputation, and attorney's fees.

I hereby swear, under penalty of perjury, that the above statements are true and accurate to the best of my knowledge and belief.



**Brooke M. Hundley**

Personally appeared Brooke M. Hundley, proving her identity to me, on this 20<sup>th</sup> day of April, 2010, and swore an oath under the penalty of perjury that the foregoing statement was her free act and deed and is true and accurate to the best of her knowledge and belief.



**Notary Public**

**GLADYS MORENO**  
**Notary Public - State of New York**  
**No. 01MO6173834**  
**Qualified in New York County**  
**My Commission Expires Sept. 04, 2011**

CHARGE OF DISCRIMINATION  
This form is effected by the Privacy Act of 1974

ENTER CHARGE NUMBER  
 FEPA  EEOC

COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES AND EEOC  
(State or Local Agency, if any)

NAME (indicate Mr., Ms., or Mrs.)  
Ms. Brooke Hundley

HOME TELEPHONE NO. (include Area Code)  
(719) 238-9152

STREET ADDRESS  
148 Madison Street

CITY, STATE AND ZIP CODE  
New York, NY 10002

NAME IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME  
ESPN Productions, Inc.

NO. OF EMPLOYEES/MEMBERS  
>75

TELEPHONE NO. (include Area Code)  
(860) 314-9565

STREET ADDRESS  
ESPN Plaza

CITY, STATE AND ZIP CODE  
Bristol, CT 06010

NAME

TELEPHONE NO. (include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

CAUSE OF DISCRIMINATION BASED ON [Check appropriate box(es)]  
 RACE  COLOR  SEX  RELIGION  
 NATIONAL ORIGIN  AGE  RETALIATION  
 OTHER (Specify)

DATE MOST RECENT OR CONTINUING  
DISCRIMINATION TOOK PLACE.  
(Month, day, year)  
10/26/2009

The particulars of this charge of discrimination are set forth in my complaint number \_\_\_\_\_

which I filed with the Connecticut Commission on Human Rights and Opportunities on \_\_\_\_\_

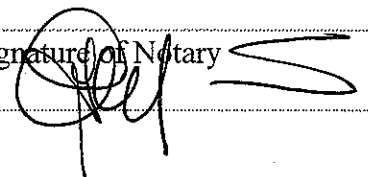
which is attached hereto and incorporated as if fully set forth herein.

[ X ] I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

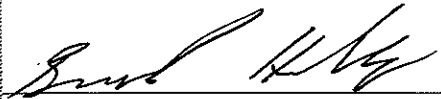
GLADYS MORENO  
Notary Public - State of New York  
NOTARY No. 01801573834  
State and Local Requirements  
Qualified in New York County  
My Commission Expires Sept. 04, 2011

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature of Notary



I declare under penalty of perjury that the foregoing is true and correct.



SIGNATURE OF COMPLAINANT

Date 4/21/10 Charging Party (Signature)

My Commission Expires: 9/4/2011

SUBSCRIBED TO AND SWORN BEFORE ME THIS DATE

(4/20/2010)

EEOC FORM 212

## NOTICE OF RIGHT TO REQUEST PROCESSING BY EEOC

You have filed with the Connecticut Commission on Human Rights and Opportunities (CHRO) a complaint affidavit alleging a violation of Connecticut's law(s) prohibiting employment discrimination. You have also filed a charge with the United States Equal Employment Opportunity Commission (EEOC) alleging a violation of federal law(s) prohibiting employment discrimination. The Boston Area Office of EEOC has jurisdiction over Title VII and ADEA, and ADA complaints, in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont. The address of the Boston Area Office is JFK Federal Office Building, Government Center Room 475, Boston, Massachusetts 02203.

In accordance with applicable worksharing agreements, between the CCHRO and EEOC, your complaint **will ordinarily** be processed by CCHRO. The EEOC will accept the CCHRO's final finding or resolution of your case and adopt it as its own subject to review by EEOC for compliance with EEOC policy and procedure.

If your initial filing was made with EEOC, that agency, and not CCHRO, may commence processing in the first instance provided you consent. If your initial filing was made with CCHRO, you also have the right to request that EEOC proceed first. You should be aware, however, that CCHRO and EEOC ordinarily will not conduct simultaneous separate investigations of your discrimination claim. This agency will not proceed with its investigation should EEOC commence processing, but will suspend processing pending the conclusion of EEOC's investigation. Upon completion, this agency will review EEOC's investigation of your case and adopt EEOC's disposition, provided it is in accordance with Connecticut law and compatible with this agency's procedures.

CCHRO has no authority to independently waive its jurisdiction once a complainant has properly invoked CCHRO's jurisdiction by duly filing a complaint. The right to the protection of state laws enforced by CCHRO can only be waived by you, the complainant. This right may be exercised by voluntary withdrawal of the complaint. The request to withdraw must be voluntary and cannot be compelled by CCHRO or EEOC.

A request for withdrawal is subject to the approval of CCHRO's Chairperson. Where a request for withdrawal is submitted after the conclusion of this agency's investigation, but prior to formal submittal of the case for disposition, approval will not ordinarily be granted. The case will be disposed of on the merits and you may exercise your right, as set forth in the "Notice of Right to Request Review", to request that EEOC conduct a review of this agency's final action in your case

Should you have any questions regarding this matter, please contact the office of the Commission on Human Rights and Opportunities where you filed your complaint or the Boston Area Office of EEOC.

I ACKNOWLEDGE RECEIPT OF THIS NOTICE

Brooke Hundley                      4/20/10  
Brooke Hundley                      DATE

\_\_\_\_\_ Respondent

CHRO No: \_\_\_\_\_

EEOC No: \_\_\_\_\_

F103(1) Issued 4/94  
Revised 1/1/96

F103(1) Issued 4/94  
Revised 1/1/96

STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

NOTICE TO COMPLAINANT OF DUTY TO COOPERATE

I, Brooke Hundley, understand that it is my duty to respond timely to any information and/or assistance requested of me by the Commission and to cooperate with the Commission at all times. Further, I understand that it is my sole duty and responsibility to notify the Commission of my whereabouts at all times throughout the pendency of this complaint and, in the event my address and/or telephone number changes, it is my duty to notify the Commission immediately. In this respect, I represent that the individual named below, whose address and telephone number is as stated, will always know my whereabouts and can always contact me. This individual is:

NAME:	Richard Hayber
FIRM:	The Hayber Law Firm, LLC
ADDRESS:	221 Main Street, Suite 502
CITY:	Hartford
TELEPHONE:	(860) 522-8888

Additionally, I promise to provide the Commission, within a period of time not to exceed two working days after my receipt of it copies of the following documents: {check applicable spaces}

yes \_\_\_no (a) copies of any and all decisions and or determination(s) made by the Connecticut Department of Labor, Division of Unemployment Compensation, respecting my eligibility to receive Unemployment Insurance Compensation;

yes \_\_\_no (b) copies of any writings that my employer gives to the Connecticut Department of Labor as to its consent and/or objection to my receiving benefits;

yes \_\_\_no (c) copies of any transcript(s) and/or tape recordings of testimony given by myself and my employer to the Connecticut Department of Labor;

\_\_\_ yes \_\_\_no (d) copies of any union grievances filed by co-workers or myself challenging the company's behavior, the outcome of any grievances, etc; and,

F002 Issued 4/21/94

Revised 1/1/96


\_\_\_yes \_\_\_no (e) other information, please describe:

---

If at any time the Commission is unable to contact me, the Commission will be deemed to have provided me with actual notice by mailing two letters first class mail to my last known address. It will be presumed, that once the letters have been mailed that I have received the correspondence unless the letters are returned to the Commission by the Post Office.

For the purposes of the EEOC notice requirement, when the Commission is unable to contact me, a letter will be sent certified mail, return receipt requested. Once this letter has been mailed I will be deemed to have received actual notice.

Brooke Hundley



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Date: 4/20/10

F002 Issued 4/21/94

Revised 1/1/96



CONNECTICUT COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES

CHRO NO.: \_\_\_\_\_

EEOC NO.: \_\_\_\_\_

AUTHORIZATION TO RELEASE  
INFORMATION FROM THE RECORDS OF

\_\_\_\_\_

I, Brooke Hundley hereby authorize disclosure by

ESPN Productions, Inc.

to the representative of the CONNECTICUT COMMISSION ON HUMAN RIGHTS AND  
OPPORTUNITIES of the information and record specified below that concern my complaint  
filed with the COMMISSION.

( ) Medical Records

(X) Personnel Records

( ) Credit Rating, or information as listed below:

Brooke Hundley 4/20/10 (Signature of  
Complainant)(Date)

522-53-3222 January 2, 1987 (Social Security Number)(Date of Birth)

148 Madison Street, Apartment 11 E, New York, NY 10002 (Address)

(719) 238-9152

(Telephone number with Area Code)

**NOTICE OF RIGHT TO REQUEST REVIEW**

This Notice is to let you know that the charge to which you are a party, filed with both the Connecticut Commission on Human Rights and opportunities (CCHRO) and the federal Equal Employment Opportunity Commission (EEOC), will be processed by the CCHRO.

In accordance with the Commission's Procedural Regulations, the Commission will accept the CCHRO's final finding or resolution of the charge and adopt it as its own unless a party to the charge requests the EEOC to conduct a review of the CCHRO's final action.

To exercise this right you must submit your request for review, in writing, to the EEOC office at the following address: EEOC Area Office, J.F.K. Federal Building, Government Center, Room 475, Boston, MA 02203 **within fifteen (15) days** of the date of which you receive the CCHRO's notice of its final findings or resolution.

If you have any questions concerning this notice or your right to request review, please contact this office.

I ACKNOWLEDGE RECEIPT OF THIS NOTICE

  
Brooke Hundley

4/20/10  
Date

\_\_\_\_\_  
Respondent(s) Name

CHRO No.:

EEOC No.:

**FORM 103(1)  
ADDENDUM (CAP)**

**CONNECTICUT COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES**

**INFORMATION REGARDING COMPLAINTS PREVIOUSLY FILED WITH  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

PLEASE PROVIDE THE FOLLOWING INFORMATION:

[ ] I HAVE FILED ONE PREVIOUS COMPLAINT(S) WITH CHRO.

DATE(S) OF FILING: \_\_\_\_\_

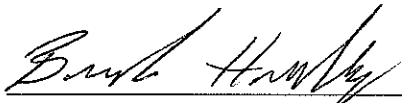
CHRO CASE NO(S): \_\_\_\_\_


REGIONAL OFFICE(S): \_\_\_\_\_

INCIDENT(S) ALLEGED: \_\_\_\_\_

I HAVE NOT PREVIOUSLY FILED A COMPLAINT WITH CHRO.

I UNDERSTAND THAT FAILURE TO DISCLOSE THIS INFORMATION MAY DELAY  
PROCESSING OF MY COMPLAINT AND/OR RESULT IN ADVERSE CONSEQUENCES.

  
\_\_\_\_\_  
Brooke Hundley

  
\_\_\_\_\_  
Date

CHRO No.: \_\_\_\_\_

EEOC No.: \_\_\_\_\_

### STATEMENT OF REMEDY


I have been told that the full remedy for the discrimination I feel has occurred, if the evidence secured in the investigation fully supports my claims, would probably be:

- reinstatement in my job
- full back pay plus interest, minus interim earnings, including unemployment compensation, welfare payments, etc.
- compensatory damages (pain/humiliation)
- restoration of seniority and fringe benefits
- ceasing harassment
- hire
- offer of housing
- guarantee of equal service
- medical benefits/insurance costs
- granting of credit
- other: specify: attorneys fees and costs, and all other remedies available at law or in equity.

During an investigation, the Respondent may offer a settlement which is less than a full remedy. The investigator will tell you of the offer and give you his/her estimate, based on the results of the investigation until that time, of your chance of qualifying for a full remedy. You may then decide whether or not you want the investigator to pursue the settlement offer.

If you decide not to take the offer, the investigation will continue and may result in a finding favorable or unfavorable to you.

I have read and understand the above information.

  
\_\_\_\_\_  
Brooke Hundley

Date: 4/26/10

Complaint Intake Officer/  
Investigator

F103(3)

Issued 4/24/94

Revised 1/1/96

STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

**COMPLAINANT WITNESS LIST**

**Brooke Hundley**

CHRO NO.:

VS.

DATE FILED:

**ESPN Productions, Inc.**

(X) I identify the following witnesses at this time:

Witness Name

Relationship  
to Incidents

List  
Specifics  
address,  
Telephone  
Alleged

to which this  
person can  
testify

Doug Adkins  
and

HR Representative

investigation  
termination

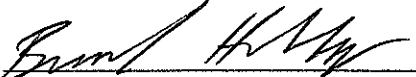
Donna Hricisko  
and

HR Representative

investigation  
termination

I reserve the right to name additional witnesses at a later date.

( ) I have no witnesses at this time.

  
\_\_\_\_\_  
**Brooke Hundley**

Date: 4/20/10

F001(7)

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