

Madison Equal Opportunities Commission  
210 Martin Luther King, Jr. Blvd., Room 523, Madison WI 53703-3346  
PH: (608) 268-4910

Department of Civil Rights

APR 14 2014

Received

EOC Case No.	20142005
ERD Case No.	
EOC/ERD Case No.	2014201400033

**COMPLAINT OF DISCRIMINATION (QUERRELLA DE DISCRIMINACIÓN)**

**COMPLAINANT (QUERELLANTE)**

Name (Nombre): Natalee Cruse  
Address (Dirección): 7890 Dairy Ridge Road  
City (Ciudad): Verona State (Estado): WI Zip Code (Código Postal): 53593  
Telephone (Teléfono): Home (Casa): 608-258-9588 (attorneys' no.) Work (Trabajo): \_\_\_\_\_

**RESPONDENT (DEMANDADO)**

Name (Nombre): Nordic Consulting  
Address (Dirección): 740 Regent Street, Suite 400  
City (Ciudad): Madison State (Estado): WI Zip Code (Código Postal): 53715  
Telephone (Teléfono): 608-268-6900

**THIS COMPLAINT CONCERNS: (ESTA QUERRELLA ES REFERENTE A:)**

☐ Housing (Vivienda) ☒ Employment (Empleo) ☐ Public Accommodations (Acomodaciones Públicas)

**IN REFERENCE TO: (EN REFERENCIA A:)**

<input checked="" type="checkbox"/> Sex (Sexo)	<input type="checkbox"/> Marital Status (Estatus civil)	<input type="checkbox"/> National Origin/Ancstry (Origen Nacional / Descendencia)
<input type="checkbox"/> Color (Color)	<input type="checkbox"/> Student (Estudiante)	<input type="checkbox"/> Social Security (Seguro Social)
<input type="checkbox"/> Age (Edad)	<input type="checkbox"/> Political Beliefs (Creencias Políticas)	<input type="checkbox"/> Domestic Partners (Compañeros Domésticos)
<input type="checkbox"/> Race (Raza)	<input type="checkbox"/> Physical Appearance (Apariencia Física)	<input type="checkbox"/> Citizenship (Ciudadanía)
<input type="checkbox"/> Disability (Incapacidad)	<input checked="" type="checkbox"/> Retaliation (Represalias)	<input type="checkbox"/> Gender Identity (Identidad de género)
<input type="checkbox"/> Arrest Record (Arresto)	<input type="checkbox"/> Less Than Honorable Discharge from the Military (Licenciamiento deshonroso del ejército)	<input type="checkbox"/> Genetic Identity (employment and housing) (Información genética)
<input type="checkbox"/> Conviction Record (Condena)	<input type="checkbox"/> Family Status (Estado Familiar)	<input type="checkbox"/> Victim of Domestic Abuse, Sexual Assault or Stalking (housing) (Ser víctima de violencia doméstica, agresión sexual o acoso/hostigamiento - vivienda)
<input type="checkbox"/> Religion (Religión)	<input type="checkbox"/> Source of Income (Fuente de Ingreso)	<input type="checkbox"/> Credit History (employment) (Historial de crédito - empleo)
<input type="checkbox"/> Sexual Orientation (Orientación Sexual)		<input type="checkbox"/> Unemployment (employment) (Desempleo - empleo)

**EXPLAIN WHAT WAS DONE THAT YOU BELIEVE WAS DISCRIMINATORY (EXPLIQUE LO QUE LE OCURRIÓ QUE USTED CREE ES DISCRIMINACIÓN) (La información debe ser provista en inglés):**

Complainant was sexually harassed by her supervisor, the President and co-owner of Nordic, and then discharged in retaliation for reporting the harassment. See, Statement of Discrimination, attached.

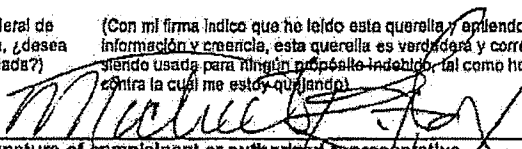
If the Wisconsin Equal Rights Division and/or the Federal Equal Employment Opportunity Commission have jurisdiction over your complaint, would you like this complaint filed with the appropriate State and/or Federal Agency?

(Si la División de Derechos Iguales de Wisconsin o la Comisión Federal de Derechos Iguales en el Empleo tienen jurisdicción sobre su querrela, ¿desea que esta querrela sea sometida a la agencia estatal o federal apropiada?)

☒ Yes ☐ No

By my signature below, I acknowledge that I have read the complaint, that to the best of my knowledge, information and belief the complaint is true and correct, and that the complaint is not being used for any improper purpose such as to harass the party against whom the complaint is filed.

(Con mi firma indico que he leído esta querrela y entiendo que, basado en mi conocimiento, información y creencia, esta querrela es verdadera y correcta, y esta querrela no está siendo usada para ningún propósito indebido, tal como hostigar a la entidad o persona contra la cual me estoy querrelando)

  
Signature of complainant or authorized representative  
(Firma del Querellante o de su Representante Autorizado)

No. of employees: 300+  
No. de empleados: \_\_\_\_\_

Date Signed: 4/11/2014  
Firmada en: \_\_\_\_\_

### Statement of Discrimination

Complainant, Natalee Cruse, was hired by Nordic Consulting on October 4, 2012 in a dual role as Senior Consultant and Internal Account Manager. She transitioned to a full-time corporate position as Account Manager on January 1, 2013. She was promoted to Director of Marketing on February 18, 2013 and then to Vice President of Marketing effective June 1, 2013.

Throughout her employment at Nordic complainant was sexually harassed by her supervisor, Drew Madden, who was one of the owners and President of the company. The sexual harassment was unwelcome and had the effect of creating an offensive and intimidating work environment. The sexual harassment included without limitation the following:

- During Nordic's holiday party on December 14, 2012 Madden suggested that everyone go around the table and name the person in the office they would most like to sleep with. Complainant excused herself and went home.
- On March 6, 2013 while complainant was attending a conference in New Orleans with the Nordic team, Madden went into her room and went to sleep in her bed, uninvited.
- On April 22, 2013 Madden took an 'upskirt' photo of complainant, without her knowledge, while she was riding in the back seat of an SUV. He subsequently showed it to her and she demanded that he delete it.
- Afterward Madden sent numerous text messages about the 'upskirt' photo—regretting he did not have the "pic of [her] to share at the conference", threatening to do "research on how to restore deleted pics and texts", saying he would like "another pic of [her] laying in the back of an SUV" and referring to pictures of her "thighs" and "Inner Thigh" and the "seductive pic of [her] in the back of the Rover."
- Madden suggested the "upskirt" photo should be turned into Nordic's new billboard ad at the airport.
- In mid-May 2013 complainant asked Madden for a week off in July because she was taking a class for work and Madden asked if she was going to "modeling class" or a "class on how to walk to your desk and cross your legs." He then suggested that maybe it was for "pole-dancing." In fact, it was a marketing leadership class offered by Kellogg.

- Madden texted complainant about a small error in a company press release and when she expressed concern he texted back, "Drink two shots of something. Wax your goat and have a great weekend." He also texted, "Don't pee on your boots! Or your boobs. #autocorrect."
- Madden texted he would quit his job if complainant left Nordic and he would "pull out all the stops to make [her] queen of Nordic." He texted "if the Epic and former Epic boys drool over you now . . . I can't imagine what will happen once you're VP" and that she was "basically the cleopatra of former Epic boys." This type of attention was frequent, unsolicited and made complainant very uncomfortable.
- While at a conference in Boston on June 19-20, 2013 Madden applauded complainant for wearing a "low-cut" shirt on the first day and suggested that she sit directly across from the men they were meeting with to "let them look at her and maximize the chances of a sale." The next day Madden became intoxicated at dinner and told complainant that her breasts "look very big-bigger than they normally do." He asked if she was pregnant.
- While at the conference Madden messaged complainant saying, "I will be checking your bill for a spa service and if there isn't one on there, there will be consequences" and "How is the place? Sorry to bother you if you're in the middle of a relaxing goat wax." During this same conference Madden also came to complainant's hotel room late one night, intoxicated, and wanting to come in and talk, which was very intimidating. Complainant pretended not to hear the knocking and never opened the door.
- On July 3, 2103 complainant asked Madden if another employee could take her place at a dinner because she was feeling ill. He agreed but said she must get a massage instead. He later texted her asking how she felt and when she said it was food poisoning, he responded, "So morning sickness is completely off the table???" He also asked, "Have you ever considered dumping Brian and dating Dennis? He could really screw in your shelves too!" He said he had "googled 'female executive screwing in her own shelf' and got a few different pictures . . ."
- On July 11, 2013 Madden gave complainant an offer letter for promotion to VP of Marketing. The letter included her salary and benefits and said, "for the agreement to be finalized a picture of you in the back of a Range Rover must be texted to" Madden, referring again to the April 22<sup>nd</sup> 'upskirt' photo.

- On August 27, 2013 Madden texted complainant asking, "New York Trip: suit or sport coat? And more importantly . . . white or nude bra? . . . Do different color bras have different breathability? This is brand new territory to me . . . Oh so no comment on bras?"
- On August 30, 2013 Madden texted complainant a message composed of icons, which he translated as follows: "If Brian hits the sweet spot (twice) you will turn your cell phone off and be okay with not walking as long as you can write down what turns you on and makes your triangle go through the roof. Then you will settle down in a nice house and love your dogs and love your home."
- In early September 2013 Madden messaged complainant several times about "Spanx" e.g. "I'm not saying you look pregnant. Your Spanx are working wonders!!" and "I'm going to have a good time trying to guess when you wear Spanx for the first time . . . Maybe I'll see if the guys want to start an office pool!!"

All of the above inappropriate remarks and sexual overtures were unsolicited and unwelcome.

During a regular weekly meeting on September 25, 2013 Madden began talking about his "favorites" in the office, who were all women - though not all *good-looking* women, he emphasized, mentioning one employee whom he said was a "beautiful person" but physically unattractive and at whom he would initially "never have looked twice". He went on to state that complainant had nothing to worry about, though, because she'd always be his one and only "true favorite", telling her that he would never forget when he first met her and that he could remember the details of what she was wearing. Madden also later texted complainant, "I'll never forget the first time I met you. I know what chair you sat in. I know what purse you wore. I know what skirt you had on. And I know you were wearing cowboy boots."

After the meeting complainant ran into a co-worker, Peggy Bakken, and she broke down. She told her about Madden's inappropriate commentary on her attractiveness/physical appearance, and other objectionable behavior, and Bakken, in turn, reported the situation to her husband, Mark Bakken, who was CEO of Nordic and an owner.

Mark Bakken met with complainant on September 27, 2013. He told her this was not an isolated occurrence and he referenced other situations where he had observed Madden acting inappropriately with other women. Complainant feared

retaliation and she asked Bakken not to escalate her complaint. However, Bakken ignored her request and told Madden she had accused him of sexual harassment. This proved fatal to complainant's career at Nordic and within a short time she was let go without reason or cause.

Prior to her complaint of sexual harassment complainant was viewed as an excellent employee. She was on the fast track to higher positions and better income with the company. She had been promoted twice, had earned several bonuses and had received nothing but praise for her work in Marketing. Just a week before her complaint Bakken had told her that he envisioned someone from the next generation of leadership--like herself--being a good fit for CEO when he leaves. He told her that she was great leader and would be a great CEO.

All of this changed when complainant complained about sexual harassment. Madden was very angry with her and during a meeting in mid-October 2013 he threatened her. He said she had no idea how much he had protected her and the Marketing department--that he had been their support and their "shield" all along. He said she had no idea how different things would be if she hadn't always been his favorite; how much more difficult her job would be if he stopped making things easy for her. He said she was about to find out and that he wasn't going to protect her any longer.

Bakken's treatment of complainant also changed. During a meeting in early November 2013 he blamed her for the fact that Madden was "a wreck" and told her that she needed to "fix the situation with Madden . . . TODAY." He told her for the first time that he had concerns about the Marketing department--what they're working on and how they're perceived by the rest of the organization. However, when complainant asked for specifics Bakken was unable to identify any legitimate bases for his concerns.

Unable to tolerate the escalating hostility and retaliation complainant met with her new supervisor, Eric Sampson, on November 15, 2012 and offered her resignation. Sampson told her it was a mistake to leave, although he understood why she would want to. He asked her to reconsider and she agreed. Complainant then spoke with Bakken about resigning a week later and he said that she couldn't resign, that it was crazy, that it would be "the beginning of the end" and that others would follow. Complainant agreed to continue working for Nordic.

On or around January 14, 2014 complainant developed mono and was off work for about three weeks on medical leave. When she returned on February 3, 2014 she was summarily discharged without warning. The only reason given for her termination was that it "wasn't working out." Complainant was in fact terminated because she had opposed sex discrimination and sexual harassment in the workplace.