

1 I, Adrienne Fitzgerald, hereby declare as follows:

2 1. I am competent to testify and I make this declaration voluntarily and based on my
3 own personal knowledge.

4 2. I was employed at Kemper Sports Management, Inc. ("Kemper") as the National
5 Director of Strategic Partnership for over 16 years. I recently ended my employment with the
6 company in 2017. During part of my time at the company, I worked with Darla Hamblin.

7 3. Based on my experience and observations, Darla was a great asset to the
8 company. Darla has a strong work ethic, is very professional and did her job really well. A few
9 years ago, Darla was even named as the company's employee of the year, which is huge honor
10 considering the company has over 6500 employees.

11 4. I worked out of Chicago at the company's national headquarters. I worked closely
12 with the executive team, which included its President, Josh Lesnik and its Executive V.P. Gary
13 Binder. Darla worked at KemperSport's Bandon Dunes Golf Resort in Oregon.

14 5. Sometime at the end of summer 2016, I heard several male executives, including
15 Josh Lesnik and Gary Binder laughing and joking about a complaint Darla had filed against
16 Hank Hickox for sexual harassment.

17 6. At that time, Hank Hickox was notorious in the company for being sexually
18 inappropriate and horribly offensive. Throughout my years with the company, the executive
19 team had often commented about Henry's inappropriate behavior toward women and what a
20 dirty old man he was all the time. However, they also held him in very high regard because he
21 was very valuable to the company and had become a close friend and part of their inner circle.

22 7. Unfortunately, I also personally had multiple first-hand experiences with Hank's
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1 highly offensive and sexually inappropriate behavior during my employment at KemperSports.

2 8. Even though I made Henry aware that I found his behavior very offensive, he did
3 not seem to care and would just laugh it off. Luckily, I lived in Chicago and he lived in Oregon
4 so my direct exposure to him was limited only to when our paths would cross.
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6 9. The executive team, including Gary Binder and Josh Lesnik, had been present for
7 many years during Henry's inappropriate treatment of me. Henry was almost always surrounded
8 by many of the male members of our executive leadership team when he would make these crude
9 and sexually inappropriate comments to me and about me.

10 10. Unfortunately, the executive team's response to Hank's inappropriateness was to
11 laugh at him as if his crude comments were really funny. Even though they could see that I was
12 visibly bothered by his offensive behavior, they never cared or intervened. Instead their laughter
13 just encouraged him to continue his inappropriate behavior.
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15 11. Whenever I saw Henry, which were several times a year, Henry would call me
16 "sexy" and make other inappropriate and offensive sexual remarks about my body parts. He
17 once got so close to me I could feel his breath and told me, "You look so gorgeous, I could kiss
18 you on the mouth." I was mortified because I was genuinely worried that he might try to kiss me
19 that day. Henry was very touchy-feely and often tried to invade my personal space which always
20 made me feel uncomfortable.
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22 12. So when I heard from the management team that Darla had complained about
23 Henry harassing Darla Hamblin, I was not surprised. I also knew that management would not
24 take any action against Hank or do anything to help Darla.
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1 13. I was really heartbroken and bothered by the way Josh Lesnik and Gary Binder
2 were portraying Darla and her motive for complaining. They claimed that Darla was having an
3 affair with Hank and was probably pissed about something he had done. They did not take her
4 complaint serious and claimed that she was delusional and making it up. They were upset that
5 she had created drama which they now had to deal with. They also seemed more concerned
6 about Hank and his feelings once he finds out.
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8 14. When I heard about Darla's problems and the executive team's attitude toward
9 her complaint, despite living across the country from her, I reached out to her to comfort her. I
10 told her that I could identify with her pain of having to work every day with her harasser. I
11 shared with her that I have also been victimized by some of the male members of the executive
12 leadership team, as well as Hank.
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14 15. Until recently, all of the company's top executives were male and collectively
15 they are the epitome of a Boy's Club and treat the workplace like a high school locker room.

16 16. These men constantly talked about sex during work hours and gossiped about
17 which female employees in the company were sexy and attractive and which ones were ugly and
18 not worth "f*%#ing." They often shared their sexual fantasies and experiences in my presence at
19 work and during business trips.
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21 17. The executives and management team were a very close-knit group and often also
22 spent time together socializing outside of work, drinking and playing golf with each other. It was
23 my experience at the company that for a woman to stay or succeed in management, she had to be
24 one of the boys and put up with their inappropriate behavior.
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1 18. Despite my disapproval, these men talked to me about their sex lives and often
2 asked me extremely offensive and personal questions about my sex life. They openly questioned
3 me about multiple orgasms, threesomes, orgies, vibrators, oral and anal sex just to name a few.
4 They often did so as if they were asking me about a mundane topic like my favorite television
5 show or favorite restaurant.
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7 19. They routinely commented on how attractive I was and how I had a great body.
8 They made various comments about my boobs, butt, and other body parts.

9 20. When they spoke to me, their eyes often drifted down to my breasts and if I
10 walked by them, they would stare at my butt and make crude comments. Sometime walking by
11 them was like walking by construction workers. I felt disrespected and very disgusted by the
12 way they constantly objectified me and treated me like a piece of meat.
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14 21. I can confidently say that every member of the executive team was guilty of this
15 behavior at one point or another or was present during many of these interactions, regardless of
16 the identity of the person making the offending comments.

17 22. Unfortunately, part of my job was to travel with the executive team to various
18 golfing events around the country. Traveling with these men was always my personal nightmare
19 and caused me a lot of anxiety because they would become intoxicated and their behavior would
20 escalate from just talking about sex to coming on to me, to hugging and touching me.
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22 23. On numerous occasions during these trips, one or more of the male executives
23 aggressively pursued me while intoxicated, demanding to make-out with me, for me to give them
24 a blow job, and various other inappropriate requests. This behavior was on-going throughout my
25 employment with Kemper.
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1 24. On one trip, one of these men got really drunk and made advances toward me.
2 When I rebuffed him, he got angry and screamed, "I can f*%@k you right here if I want." I got
3 so upset that I complained to Jim Stegall. Jim did nothing and blamed alcohol for his actions.

4 25. The worst offender was Josh Lesnik who crossed the line from just making
5 sexually inappropriate comments about me and to me to actually trying to have sex with me. A
6 few years ago, I attended a KemperSports Leadership meeting held at The Glen Club which is
7 owned by KemperSports. I was terrified to wake up in the middle of the night to find Josh
8 standing in my room. Josh had obtained a key to my room from the front desk without my
9 permission and had let himself into my room. I rebuffed his advances and managed to get him
10 out without having to involve others. The experience left me shaken.

11 26. In 2016, we attended a Cubs game as part of our company sponsored event. Josh
12 got drunk and tried to make out with me in front of my colleagues. I was able to fend him off
13 but the experience left me upset and very embarrassed. There were already false rumors floating
14 at work about the two of us having an affair so his behavior did only helped fuel the rumors.

15 27. Because of these types of personal experiences, I was concerned for Darla that the
16 very same executive team that had been sexually harassing me all these years was in charge of
17 investigating Darla's claims which they were already mocking.

18 28. When I reached out to Darla, I let her know that I believed her and supported her.
19 To comfort her, I shared my own struggles with being objectified by the executive team as well
20 as Hank. I also warned her that the same executive team was claiming that she was having an
21 affair with Henry and were laughing at her complaint. Darla was devastated to hear the false
22 rumors about her and Hank at the corporate office. She became very tearful and was
23 devastated to hear the false rumors about her and Hank at the corporate office. She became very tearful and was
24 devastated to hear the false rumors about her and Hank at the corporate office. She became very tearful and was
25 devastated to hear the false rumors about her and Hank at the corporate office. She became very tearful and was
26 devastated to hear the false rumors about her and Hank at the corporate office. She became very tearful and was

1 inconsolable. I felt bad but thought she needed to know.

2 30. No one from the company has at any time contacted me as part of investigation
3 into Darla's sexual harassment complaints.

4 31. After Darla complained, we attended a sexual harassment training class.
5 Unfortunately the majority of the class time was spent on the topic of how to deal with
6 transgender employees. The executive team treated the training like a joke. Afterward, they
7 started mocking it by making inappropriate comments by prefacing it with, "we probably should
8 not say that but...."

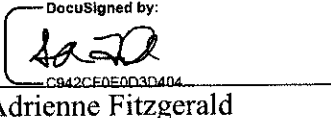
9 32. Also right after the sexual harassment training we had in late 2016, Gary Binder
10 approached me and commented, "Nice boobs." A clear indication that it was going to take much
11 more than a simple two hour class to change KemperSport's misogynist culture. The training
12 was given as a matter of formality rather than an effort to change the hostile atmosphere.

13 32. Unfortunately, nothing changed at the corporate level after the sexual harassment
14 training or Darla's lawsuit. The Executive Team continued with their inappropriate behavior so I
15 found another job and resigned a few months ago in April of 2017.

16 I hereby declare that the above statement is true to the best of my knowledge and belief,
17 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

18 9/15/2017

19 Executed on September ____, 2017 in Cook County, Illinois.

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Adrienne Fitzgerald