

COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

ADRIENNE LAWRENCE,

Complainant,

vs.

ESPN, INC., *et al.*

Respondents.

CHRO NO: 1830078

EEOC NO:

November 13, 2017

COMPLAINANT'S AMENDED AFFIDAVIT

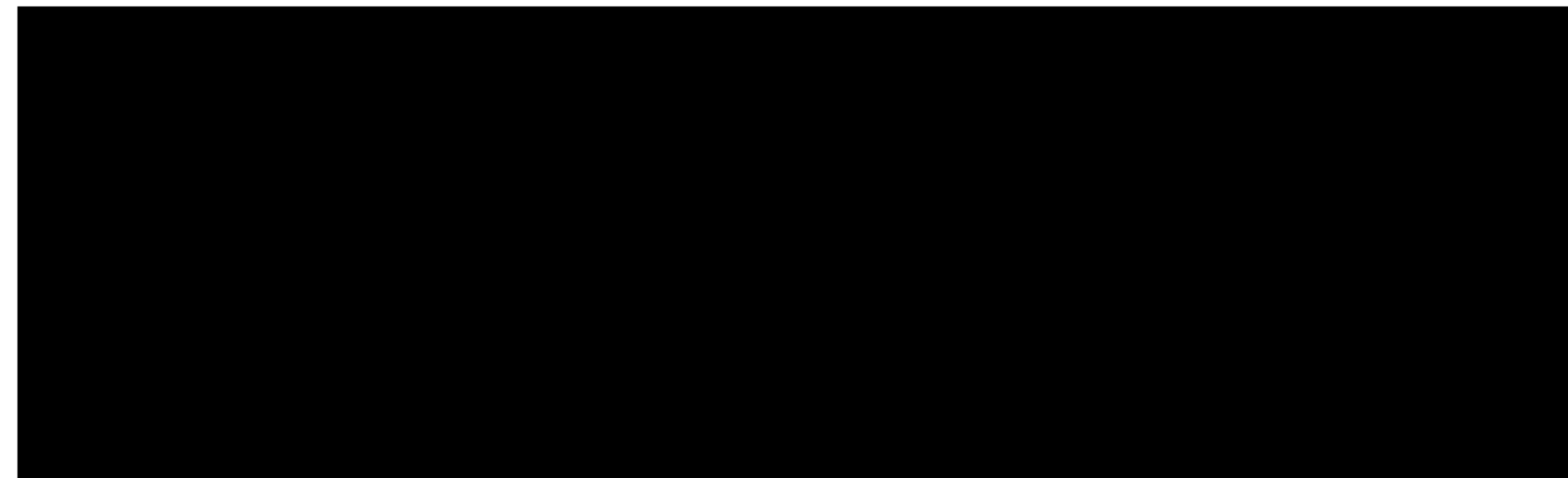
Per Connecticut Regulations § 46a-54-38a and consistent with footnote 34 of *Complainant's Reply and Information in Compliance with § 46a-54-50*, Complainant hereby submits the attached *Amended Affidavit of Adrienne Lawrence* in support of her Complaint, correcting the language in Paragraph 16. The attached also updates the residency in Paragraph 1 given Complainant's subsequent move.

Dated: November 13, 2017

Respectfully submitted,



Adrienne J. Lawrence



CERTIFICATE OF SERVICE

CHRO No.: 1830078

Complainant: Adrienne Lawrence

Respondent: ESPN

I hereby certify that the foregoing COMPLAINANT'S AMENDED AFFIDAVIT was served on November 13, 2017 as follows:

By electronic mail and first-class mail:

Lori A. Wheeler
Susan Mota
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AMENDED AFFIDAVIT OF ADRIENNE LAWRENCE
IN SUPPORT OF HER CHARGE OF DISCRIMINATION AND RETALIATION

I, Adrienne Lawrence, submit this signed and notarized affidavit in support of my claims against my former employer, ESPN, Inc., for discrimination on the basis of sex, sexual harassment, and retaliation in violation of the Connecticut Fair Employment Practices Act (CFEPA), Conn. Gen. Stat. § 46a-60 *et seq.* and Title VII of the Civil Rights Act, 42 U.S.C. § 2000e *et seq.*, and against the individuals named herein for aiding and abetting discriminatory employment practices in violation of the CFEPA, Conn. Gen. Stat. § 46a-60 *et seq.*

1. My name is Adrienne Lawrence and, unless stated otherwise, I resided at [REDACTED] [REDACTED] during the events detailed below. I am female.

2. Respondents are ESPN, Inc. (“ESPN” and “the Company”), which is located at 1 ESPN Plaza, Bristol, CT 06010, as well as the following named individuals, who aided and abetted discriminatory employment practices: Rob Gallo, Senior Director of Employee Relations of ESPN, Inc.; Donna Hricisko, former Human Resources Director of ESPN, Inc.; Megan Green, Senior Director Talent Recruitment & Negotiation of ESPN, Inc.; and Jack Obringer, Senior Coordinating Producer of ESPN, Inc.

3. From August 10, 2015 through August 9, 2016, I worked at ESPN’s offices located at 1 ESPN Plaza, Bristol, Connecticut 06010.

4. ESPN employs at least 15 employees. ESPN employs approximately 8,000 employees worldwide.

5. In July 2015, I was one of two applicants selected from a pool of over 500

candidates for a talent position with ESPN through its “ESPN the Fellowship” program. The stated purpose and intent of the Fellowship was not only to offer a two-year employment contract, but also to retain the candidates long-term as ESPN employees. According to ESPN’s own promotional material and statements to media, the Company created and launched the Fellowship in an effort to both recruit and retain on-air talent of diverse backgrounds. According to ESPN’s promotional material, ESPN’s goal was find, train and develop the “next generation” of individuals seeking careers in a sports-media environment. The program encouraged mentorship relationships and promised individualized training in a “common-core” of writing, interviewing, anchoring and production. Fellows were scheduled to work in six-month rotations in four departments: Digital Media, Radio, International/Deportes and Studio Production.

6. With this understanding, and with ESPN’s complete knowledge, I moved from Los Angeles to West Hartford, sold my condominiums, invested over \$400,000 in a home in West Hartford, and left my lucrative legal career, at which time I earned \$235,000 per year, to accept the Fellowship position at ESPN starting at \$75,000 per year.

7. In or around August 2015, I signed a two-year employment contract as part of ESPN’s “The Fellowship” program, which offered continued, permanent employment upon successful completion of the two-year program. I began working for ESPN on August 10, 2015.

8. After beginning my employment with ESPN, I quickly distinguished myself as an anchor and created a unique niche for myself as a legal analyst on domestic violence and sexual assault cases involving athletes, as well as a host of other hot-button legal issues

confronting athletes and the sports world. In addition to my routine anchoring duties and on my own initiative, I began writing articles for ESPN.com, ESPNW, and *The Undeclared*, which quickly led to invitations to appear as an on-air legal analyst across ESPN's many shows, including *Outside the Lines*, *His & Hers*, *SportsCenter*, among others. Moreover, I actively represented ESPN in the community, joining prominent boards in New England and making Company appearances in Hartford and New York. I also devoted time to supporting ESPN internally, advancing the Company's Young Professionals affinity group as part of its core committee. I made these contributions to ESPN internally and externally over the course of my employment, as I moved through different departments per the Fellowship structure, going above and beyond that which I was assigned all to the betterment of the Company. I consistently received high praise for my work and was recognized as a rising talent at ESPN.

9. Despite my glowing job performance, I endured an atmosphere at ESPN that demeaned me and other women on the basis of sex. I was subjected to unwelcome sexual and romantic advances from several senior colleagues, who had initially reached out to me under the guise of networking or offering mentorship. When I rejected their sexual or romantic advances, they refused to engage with me professionally and treated me in a less than collegial manner. From this treatment, it became clear to me that women at ESPN were unofficially expected to submit to sexual advances and sexist treatment in order to network professionally, gain advice and mentorship, and receive work opportunities, all of which were crucial for career advancement and development at ESPN – and which the Fellowship actively encouraged. ESPN had been on notice of its

sexually hostile work environment and culture toward women for more than a decade, during which time many women have reported similar mistreatment.

10. My female colleagues often commiserated with me about sexual harassment they had suffered and also sought me out for advice. Their comments and concerns conveyed a broad consensus that the culture at ESPN was both sexist and favored men, and that objecting to this treatment was both futile and self-defeating. Women at ESPN also regularly faced serious barriers to career growth that their male colleagues did not. For instance, I knew at least two women who felt pressured into providing sexual favors to management in exchange for on-air opportunities. Female employees – and several of their male counterparts – concurred that ESPN management was aware that women were subjected to a demeaning and sexually hostile culture at the Company and had no intention of addressing it.

11. At all times during my employment, my work performance was excellent. I consistently received positive feedback and praise from supervisors and other senior employees and executives. I was also repeatedly told by my supervisor and others, including ESPN President John Skipper, that ESPN would be offering me a permanent position upon my successful completion of the Fellowship program.

12. On December 7, 2016, I met with Mr. Skipper, who asked me if I was willing to remain in Bristol. I told him that I intended to remain at ESPN permanently and had in fact purchased a house in the area. Mr. Skipper asked me to email him some of my written and on-air work, which I did later that day. Shortly thereafter, Mr. Skipper responded, advising me that he had spoken with Vice President of Talent Rob Savinelli

and would support me in making a long-term contribution at ESPN. My future at ESPN was bright until I complained to my supervisors and ESPN's Human Resources Department about a disturbing pattern of sexually harassing behavior to which I had been subjected by on-air personality John Buccigross.

13. On June 3, 2016, Mr. Buccigross, initiated contact with me, ostensibly offering professional mentorship and advice. On or around June 26, 2016, I began to receive inappropriate text messages from him. Mr. Buccigross was not my supervisor, although he was senior to me and well-known at ESPN. In his text messages from June 2016 until September 2016, Mr. Buccigross made remarks about my "pretty face"; called me "doll" or "dollface" on multiple occasions; called me "#dreamgirl"; sent me photographs of myself that I had posted on social media with captions such as "#longlegs" and emoticons with hearts; told me, "I'm a white boy and I'm jacked!"; and sent me shirtless photographs of himself. On one occasion, I offered Mr. Buccigross condolences for the passing of long-time ESPN anchor John Saunders, to which Mr. Buccigross responded, "Thanks, doll. I need a hug," hoping to leverage Mr. Saunders' death as a means of obtaining some physical intimacy.

14. These sexually and romantically suggestive comments and pictures were unwelcome. At the outset of and during my interactions with Mr. Buccigross, I had repeatedly told him that I was not interested in a sexual or romantic relationship and sought his professional mentorship only. Although Mr. Buccigross initially told me that he agreed with me about the nature of our relationship, he repeatedly pushed the limits that I had set by sending me unwanted, sexually and romantically suggestive text

messages. He frequently became upset when I attempted to rebuff his advances by ignoring his messages or changing the subject.

15. On October 17, 2016, my colleague Ryen Russillo told me that several of our colleagues had heard reports that I was dating Mr. Buccigross. This rumor was not only false, but was also damaging to my professional reputation because it suggested that my progress and advancement within ESPN was owed to a romantic and sexual connection with a senior anchor, rather than based on my own initiative and stellar performance. On the basis of this rumor, several of my colleagues had already reacted by distancing themselves from me, foreclosing opportunities for me to network and advance professionally.

16. Upon information and belief, Mr. Buccigross was the source of this false rumor, thus continuing his sexual harassment of me. We had never been seen together at ESPN.

17. On October 17, 2016, I raised concerns with my Senior Coordinating Producer, Jack Obringer, about the rumor that had been circulated and my concern that Mr. Buccigross was “marking me”, a practice I had been told was common at ESPN, whereby male employees “mark” women as their own by spreading such rumors about false sexual relationships with female employees. Mr. Obringer advised me that he had an obligation to report the rumor to management, but suggested that he did not believe my report, noting that “[I] don’t know the John Buccigross that you know.”

18. On October 18, 2016, I met with ESPN Human Resources (“HR”) representative Jason Williams, and informed him that Mr. Buccigross had sent me a number of unwelcome, inappropriate text messages. I said that I simply wanted to ensure that it was

“on the record” that Mr. Buccigross and I were not dating and the damaging rumor about this was not true.

19. On October 18, 2016, the day after I reported the false rumor to Mr. Obringer, I discovered that he had chosen another reporter over me to cover Derrick Rose’s civil rape trial. I had been the only person at ESPN to cover this case, and had authored multiple articles on the subject. Mr. Obringer denied me an important career-enhancing opportunity because of my sexual harassment complaint the day before, as I was eminently qualified to cover the trial.

20. On October 21, 2016, I met with HR Director Donna Hricisko to discuss my sexual harassment complaint, describing the circumstances surrounding the false rumor and Mr. Buccigross’s inappropriate text messages and photographs. Ms. Hricisko assured me that she would interview Mr. Buccigross in person, ask him whether he was spreading the rumors, and instruct him not to contact me.

21. On October 21, 2016, I also met with my direct supervisor, Megan Green. I conveyed the same information to her that I had had told Ms. Hricisko. Ms. Green told me about other instances of sexual harassment at ESPN, including one in which a male anchor was sharing nude photos of women and video footage of himself having sex with a woman he claimed was an ESPN employee. At the conclusion of our conversation, I asked Ms. Green about potential agents, identifying those who had approached me. Ms. Green told me that everyone was especially pleased with my work, that I was certain to receive an offer from ESPN, and that I did not need to have an agent because it would be a waste of money.

22. On October 28, 2016, Mr. Buccigross made inappropriate contact with my by “liking” a photo that I had posted on my Instagram social media account, indicating that he was continuing to monitor my online presence.

23. On November 2, 2016, I emailed Ms. Hricisko to ask whether she had interviewed Mr. Buccigross, and she replied that she was scheduled to do so the following day, claiming that conflicting schedules caused the delay. Later that day, Mr. Buccigross continued to harass me by sending an unsolicited email to my ESPN email account, ostensibly praising my on-air performance. Not only had Mr. Buccigross never communicated with me this way in the past, but the fact that he emailed hours after I contacted Ms. Hricisko suggested that she had helped him attempt to cover up his sexual harassment by sending an email that would support his claim that he only had a professional, mentorship relationship with me. I advised Ms. Hricisko by email of Mr. Buccigross’s attempt to contact me.

24. On November 3, 2016, I met with Ms. Hricisko. She informed me that she had spoken with Mr. Buccigross by phone, not in person, because she did not want him to “feel uncomfortable” while waiting for an in-person meeting over the weekend. Ms. Hricisko informed me that Mr. Buccigross denied telling ESPN employees that he and I were romantically involved and that he had claimed that he thought of me solely as a mentee. Ms. Hricisko then told me that she had known Mr. Buccigross for 20 years, that he was a “good guy,” and that I should “give him a chance.” Further, Ms. Hricisko told me that rumors of sexual relationships among employees at ESPN was common and suggested that I “get used to it.” Ms. Hricisko also told me that Mr. Buccigross was

involved in a similar rumor of a sexual relationship with a married female employee just the year before and that the woman's husband became involved.

25. I was shocked at Ms. Hricisko's blasé and unprofessional response to my report of sexual harassment, the clear bias she had displayed in favor of Mr. Buccigross. Fifteen minutes after the meeting, I called Ms. Hricisko from an ESPN phone in the cafe building to confirm everything that she told me during the meeting and to raise my concerns that she had colluded with Mr. Buccigross in responding to my complaint. I questioned Ms. Hricisko about how she could credit Mr. Buccigross's denials and reach the conclusions she had despite the text messages Mr. Buccigross had sent me.

26. On November 4, 2016, I sent Ms. Hricisko a follow-up email reiterating my concerns about the rumor, expressing dissatisfaction with how she had conducted the investigation, and identifying issues with what she had said in our meeting, including the fact that she favored Mr. Buccigross based on her personal relationship with him. I explained that the rumor of a sexual relationship with Mr. Buccigross was especially unsettling because it was false, it sexualized me in the workplace, undermined my contributions, and encouraging further sexual harassment and disrespectful treatment of me. I also expressed concerns that my sexual harassment report would lead to further retaliation. I noted that I had left my previous career with the understanding that ESPN would offer me a permanent position if my work was acceptable, that my superiors had repeatedly praised my work and performance, and that it would be unfortunate if I were to be deprived of an offer due to my sexual harassment report.

27. Later that day, on November 4, 2016, I received an email from HR Senior

Director of Employee Relations Rob Gallo, who informed me that Ms. Hricisko forwarded my email to him, and offered to meet with me to discuss my concerns further. I understood from his email that HR's investigation of my complaint was still underway. I believed that such a meeting with Mr. Gallo would be futile because I had already thoroughly documented my concerns by email and in previous meetings, and also because I had lost confidence in HR's impartiality in the complaint procedure.

Accordingly, I wrote Mr. Gallo to decline his invitation to meet. He did not respond.

28. On November 8, 2016, I met with Ms. Green to discuss my concerns about HR's mishandling of my complaint. Ms. Green warned me not to "keep this alive," and told me about a previous employee who complained to HR about a coworker who placed disparaging flyers about the employee in one of the ESPN mailrooms. The employee did not believe HR was taking action to stop this treatment, and insisted something be done. According to Ms. Green, this pursuit ended up "derailing" the employee's career. Ms. Green again told me that I was a lock-in for a permanent position at ESPN, and that I should "let it go." When I explained that HR's purported investigation and response were unacceptable to me, Ms. Green appeared taken aback that I was unwilling to let it go. Ms. Green said that she would speak to Mr. Gallo about my concerns, but I never received any confirmation that this had been done.

29. On December 4, 2016, I emailed Mr. Gallo to ask about the status of the investigation, reiterating the information I had provided to Ms. Hricisko and again outlining my concerns with Ms. Hricisko's account of her conversation with Mr. Buccigross, noting that Mr. Gallo's team failed to conduct a proper inquiry.

30. On December 6, 2016, Mr. Gallo responded saying, among other things, that HR had “considered this matter closed” after my November 4, 2016 email declining to meet him in person. He then claimed that I failed to provide HR with copies of the text messages and photographs, and failed to identify “witnesses,” although neither Ms. Hricisko nor Mr. Gallo had ever requested such information from me. He also offered to meet with me to discuss how the process could be improved. I responded to this email explaining, among other things, that my main concern was that I was not afforded a professional and unbiased process, particularly with respect to Ms. Hricisko’s comments to me that indicated that she was biased in favor of Mr. Buccigross. I accepted his offer to meet, and had a phone meeting with him on December 14, 2016. During this meeting, he asked whether I had anything further to report, and I told him that I did not feel comfortable speaking to his department about my concerns moving forward, given Ms. Hricisko’s clear bias in favor of and collusion with Mr. Buccigross, and Mr. Gallo’s failure to address either. In response, Mr. Gallo told me to speak with Ms. Green instead.

31. On December 9, 2016, Mr. Obringer and I met in his office and he told me that he was concerned about me, noting that I had been losing weight and appeared less happy. He said that he believed it was due to the situation with Mr. Buccigross. I explained to Mr. Obringer what Ms. Hriscko had told me on November 3, 2016, and that I was very disturbed that a man at ESPN could claim a right to a woman’s body at her place of employment and that her employer would work to help him cover up his harassment. I noted how disturbed I was that, even when a woman tells HR that the man made her uncomfortable, sent her suggestive text messages with shirtless photos of himself and

heart-faced emoticons, HR would tell her it was a “mentorship” relationship simply because the man said it was.

32. In response, Mr. Obringer threatened to call Ms. Green — who had already “warned” me about the career-derailing consequences employees faced when they did not let things go. Mr. Obringer suggested that I take time off from work. Fearing that I would lose my on-air opportunities, I declined this offer.

33. Following my sexual harassment complaints to HR, ESPN retaliated against me by attempting to limit my opportunities to contribute. I had been the main anchor for the 1-4 p.m. *SportsCenter* Updates shift on ESPNNEWS. In the aftermath of my sexual harassment complaint, ESPN assigned me fewer on-air *SportsCenter* Updates shifts. In November 2016, I had 14 shifts. In December 2016, after I had made it clear that I was not going to heed Ms. Green’s November 8, 2016 warning and drop the matter, ESPN assigned me just five shifts. Mr. Obringer had assigned another colleague who primarily worked in the Digital Department to the shifts I would typically receive. After my December 9, 2016 meeting with Mr. Obringer, I reiterated to him several times that I did not want to take time off and wanted to contribute. I did not believe it was appropriate that I be pushed out because I objected to Mr. Buccigross’s misconduct and HR’s efforts to help him hide his misconduct. After multiple requests to Mr. Obringer, he finally returned four of my shifts from December 27-30, 2016.

34. As a result of my sexual harassment complaint, my superiors also attempted to make baseless claims about my sports knowledge, presumably as a way to justify limiting my contributions. On January 5, 2017, Mr. Obringer told me during a check-in meeting

that my performance on-air had been very good but that he was concerned about my “historical sports knowledge” – an excuse that my colleagues had told me was commonly used at ESPN to justify excluding women. Later that week, Ms. Green reiterated the exact same concern, tracking Mr. Obringer’s comments almost verbatim. I had never before received a critique about my sports knowledge, and when I asked Mr. Obringer for clarification about what he meant and requested specific directives for how to improve, he said that he was concerned about my ability to provide historical context given my previous legal career, although he made clear that he did not think my knowledge was substandard. When I pressed Mr. Obringer for specifics and noted to him that my previous career was known to ESPN when it hired me – and that ESPN considered my ability to provide legal analysis an asset – Mr. Obringer eventually conceded that he only meant I should continue studying sports like everyone else at ESPN because it was a continually developing craft. Ms. Green also walked back her claim about my sports knowledge.

35. Ms. Green encouraged me to focus on my news updates role in the Radio Department and to not write legal articles or provide legal analysis for the Company – tasks that I had performed very well and which gave me important visibility. While I initially followed Ms. Green’s direction, after several months had passed, I took an opportunity to bring attention to two important legal issues in the sports world. Working with my editor at ESPNW, on March 8, 2017, I published two articles that garnered extremely high traffic on ESPN’s website with significant response from ESPN readers, formed the basis for segments across ESPN, and received high praise. On March 10,

2017, Ms. Green me with me to ask about my updates role in the Radio Department.

When I told her that it was going well and that I had additionally written two well-received articles, she responded in a condescending tone, “You want to do intellectual things, don’t you?”

36. After I reported sexual harassment, *SportsCenter* and other ESPN shows stopped calling on me to provide legal coverage, as they had regularly before my report. In 2016, I made far more legal appearances and wrote far more articles than any other analyst at ESPN’s disposal. I had made at least 12 appearances providing legal analysis on-air and authored at least 12 articles for ESPN sites. I had become ESPN’s primary legal analyst, receiving high praise across the network from Mr. Obringer, producers, and executives, and my analysis was well-received by viewers via social media. After I reported Mr. Buccigross and refused to let the matter go as Ms. Green had warned me to do, ESPN began using ABC Reporter Ryan Smith for legal analysis, despite having relied on him very little for legal coverage in 2016.

37. Even when I offered to provide legal analysis, I was denied the opportunity or discouraged from doing so. For example, on April 14, 2017, I offered to provide legal analysis on a news story while I was already in the newsroom and camera-ready. ESPN refused without explanation, and then invited Mr. Smith to provide the analysis. On April 19, 2017, I published another legal analysis piece on my Instagram page, which was well-received and prompted invitations for me to appear on other shows to discuss the issue. Nevertheless, on April 25, 2017, Ms. Green emailed me to ask whether my “legal take” had been vetted through the news desk or ESPN.com, despite admitting that there was no

such policy requiring me to do so.

38. On April 26, 2017, ESPN laid off over 100 employees, who were mostly on-air talent. In explaining the layoffs, Mr. Skipper stated that the Company was looking to tailor its staffing to individuals who could perform across a variety of platforms, *i.e.*, writing, hosting, and analyzing; to train and grow such versatility was one of the promoted hallmarks of my Fellowship position, which offered hands-on training in multiple areas of sports media and broadcasting.

39. Despite this fact, ESPN's stated goals of retaining talent through the Fellowship program, and assurances that I would be retained upon successful completion of the Fellowship, on April 28, 2017, Ms. Green informed me that ESPN would not have a place for me at the conclusion of my two-year Fellowship. Ms. Green told me that the inability to find a permanent placement for me came as a result of the Company-wide reduction in staff, rather than any shortcoming in my performance.

40. On May 2, 2017, in response to a text message from Ms. Green asking how I was feeling, I emailed her expressing concerns that ESPN's failure to offer me a permanent position was in retaliation for reporting sexual harassment and complaining about HR's inadequate handling of my complaint. I also pointed out that I was aware that ESPN planned to offer Mr. Buccigross a multi-year deal, notwithstanding his inappropriate conduct toward me, HR's collusion with Mr. Buccigross, and his history of sexual harassment as openly admitted by HR. Although Ms. Green initially responded that I needed to meet with HR and ESPN's Legal Department to discuss the matter, no one from the Company ever followed up with me to discuss my concerns.

41. After raising concerns that the Company failed to offer me a permanent position in retaliation for my complaint, ESPN further retaliated by assigning me an unfavorable schedule. On May 15, 2017, I was informed that, at Ms. Green's request, I would be reassigned to an undesirable graveyard shift in the Digital Department, before I had completed my scheduled six-month assignment in the Radio Department as *The Russillo Show* Updates anchor. Moreover, the new schedule would provide fewer on-air opportunities — reducing me from 16 on-air appearances a week at a *minimum* to 7 on-air appearances a week at a *maximum*. Mr. Obringer claimed that the reason for my reassignment was that my previous Updates anchor role had been moved out of the Radio Department.

42. After raising these concerns with Ms. Green that the proposed schedule was retaliatory, on May 26, 2017, Ms. Green informed me of a different reassignment that would allow me to remain in the Radio Department. However, this assignment also had similar, graveyard shift hours and was not simulcast on television, thus limiting my exposure. I was not afforded meaningful opportunities to contribute in my new role, despite what I had been told, because management assigned co-hosts to serve on the show and the producer played an active role contributing to the show, leaving little room for me to contribute.

43. Further, ESPN's reasons for reassigning me were baseless. My previous position as Updates anchor continued to exist, contrary to the Company's previous representations that it would be eliminated from the Radio Department. On June 9, 2017, I shared these concerns with Ms. Green, and requesting that I be reinstated to my previous role. On

June 12, 2017, Radio department supervisor Pete Ciccone confirmed to me that Mr. Obringer had decided not to eliminate the Updates anchor role until late summer, which would likely have been after my contract ended. Without any explanation as to why I was reassigned in the first place, ESPN granted my request to be reinstated to my previous role.

44. On June 21, 2017, my counsel sent a letter to ESPN detailing my legal claims of sex discrimination, sexual harassment, and retaliation. After receiving this letter, ESPN escalated its retaliation against me.

45. On July 19, 2017, Ms. Green engaged another odd retaliatory act, suddenly informing me that I needed to enter into a computer system all of the time off I had taken since the beginning of the year – something I had never before been asked to do. This task was particularly onerous, as I did not have a record of every day I had taken off in the last seven months and had great difficulty reconstructing whether days I had been traveling were ESPN-related working days – guesswork that likely resulted in my using more of my accrued paid time off than necessary. Further compounding the retaliation, Ms. Green also informed me that time off I had taken to pursue future employment would have to come out of my vacation days, contrary to Ms. Green's previous representations that I could take the time I needed to pursue other employment opportunities.

46. In a further demeaning act, ESPN management disabled my keycard badge. On the morning of July 20, 2017, I arrived at the entrance of ESPN's main campus only to find that my employee keycard badge did not work and I could not enter the property. As my coworkers passed me to gain entry, security held me while several phone calls were

made to verify my entry privileges. After I was finally allowed to enter ESPN's facility, I was offered no explanation as to why my badge suddenly stopped working after nearly two years of employment.

47. More significantly, on July 20, 2017, ESPN management excluded me from any role in providing on-air coverage of a major news story – the O.J. Simpson parole hearing. Instead, it selected a less qualified individual with no legal background or relevant experience to provide analysis about the hearing. I was the most qualified person to report on Simpson's parole hearing, given my legal and professional background. I am both African American and an alumnae of the University of Southern California, where Simpson earned his Heisman trophy, making me uniquely qualified to cover the parole hearing. Several of my colleagues found my exclusion from coverage so notable that they reached out to me to express concern and disagreement with the decision.

48. Despite ESPN's claims that it could not offer me continued employment due to reduction in staff, Ms. Green later told me and other employees that ESPN would continue to offer the Fellowship program, which it has held out as a way to hire and retain diverse talent. Further, contrary to ESPN's claims that it did not have any open positions, on or around July 12, 2017, my agent learned that ESPN is looking to fill a position for which I am qualified. ESPN executive producer Bill Wolfe told my agent that ESPN is looking to hire an intelligent woman, not just a 'pretty face,' as it were, who can go toe-to-toe with the male hosts. My stellar performance at ESPN, strong knowledge, and consistently positive reviews indicate that I would have been the ideal

candidate for the position. I also became aware that ESPN was considering candidates at all experience levels – including a current ESPN employee who has less on-air experience than me.

49. Moreover, ESPN has offered continued employment with my male counterpart who was hired through the same Fellowship program, Treavor Scales. ESPN actively assisted him in securing continued employment with the Company. In sharp contrast, the Company informed me that I had not been considered for any positions.

50. Additionally, since the April 2017 layoffs, ESPN has hired a litany of talent at various skill levels to fill the roles of those recently laid off, including Adrian Wojnarowski, Jac Collinsworth, Chip Kelly, Phil Steele, Joel Anderson, among others. Since that time, ESPN has also extended the employment contracts of numerous talent, including Mr. Buccigross, keeping him at the network notwithstanding his repeated instances of sexual harassment and misconduct.

51. Contrary to ESPN's claims that it could not offer me continued employment due to reduction in staff, it is clear from its failure to consider me for any positions – and the fact that positions were available – that I was not evaluated based on my merit, qualifications, and performance.

52. I therefore charge the Respondent ESPN with sex discrimination, sexual harassment, and retaliation for my reporting of sexual harassment and discrimination, and Respondents Gallo, Hrisicko, Green, and Obringer with aiding and abetting discriminatory employment practices.

I SOLEMNLY SWEAR OR AFFIRM under the penalties of perjury that the matters set forth in this Affidavit are true and correct to the best of my personal knowledge, information, and belief.



Adrienne Lawrence

Nov. 13, 2017

Date

Subscribed and sworn before me on: see attached CA jurat form

Notary Public

My Commission Expires

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 13
day of November, 2017, by Adrienne J. Lawrence

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.



(Seal)

Signature

A handwritten signature in black ink, appearing to read 'F. Rabizadeh', written over a horizontal line.