

I provide the following particulars:

1. My name is Shelly Sindland. My mailing address is [REDACTED]

2. The respondent, the Tribune Company (hereinafter "Tribune") d/b/a Fox 61 News (hereinafter "respondent", "Fox 61", or "the station"), is a Delaware corporation with a headquarters and place of business located at One Corporate Center, Hartford, Connecticut 06103.

3. The respondent employs more than 15 persons.

4. My date of birth is April 28, 1969 and I am forty (40) years old.

5. I am a woman who was discriminated against by the respondent based on my age (40), based on my gender, and based on negative stereotypes about my gender, including my status as an unmarried and single parent of a two-year old daughter.

6. I am a woman who was retaliated against by the respondent for engaging in the protected activity of opposing the respondent's discriminatory practices and filing internal complaints and participating in internal investigations with respect to that discriminatory activity.

---

7. I have been employed by the respondent since approximately 1995 through the present, as a Reporter. I have a degree in Communications/Journalism from Seton Hall University.

8. I am the most senior Reporter at Fox 61 with more than fourteen years at the station and more than eighteen years of total reporting experience. Throughout my career, I have interviewed a wide variety of public figures, including former President Bill Clinton, Former Senator Hillary Clinton, Former Vice President Al Gore, Senator and Former Presidential candidate John McCain, Former President George H.W. Bush, the Queen of Jordan, actor Christopher Reeve, Former Vice President Dick Cheney, and Former First Lady Laura Bush.

9. In addition, throughout my career, I have covered many high-profile stories and also have received several awards for my work. For example, in approximately 1996, I reported on the TWA Flight 800 Crash off Long Island. In approximately 1996 I reported on male breast cancer and received a public service award from the Associated Press for my coverage. In approximately 1997, I pitched a story about Chernobyl and traveled there to report on the efforts of a humanitarian group, and received an award for that coverage from the Society of Professional Journalists. In approximately 2000, I started a consumer reporting program called "Shelly Show Me," which I developed and executed on my own in order to test various consumer products and report on my results. In approximately 2003, I reported extensively on the corruption trial of Mayor Joe Ganim of Bridgeport and received an award for that coverage from the Associated Press. In approximately 2004, I reported on the plea agreement between the state and former Governor John Rowland

---

concerning charges made against Rowland. In 2005, I was selected as one of only five reporters in the state to witness the execution of Michael Ross. I received an Associated Press Award for my coverage of the Ross Execution.

10. In approximately 2005, I became the respondent's political reporter, and have worked in that capacity since. As the political reporter, I have been a guest on several occasions on the Colin McEnroe political radio show which was broadcasted on WTIC-1080 AM.

11. Throughout my employment with the respondent, up to and including the present, I have always carried out my responsibilities with dedication and loyalty. Until June 2009, I have received consistently good performance reviews.

12. On or about June 27, 2005, Rich Graziano became the General Manager at Fox 61. On or about March 30, 2009 Graziano was also named publisher of the Hartford Courant which the Tribune Company owns.

13. Since January 2006, in addition to my weekly reporting responsibilities, I have been the host of "Beyond the Headlines," a weekend political roundtable discussion news show (now called "The Real Story"). Since on or about July 2007, I have been responsible for much of the production duties for the weekend show. In or about September 2007, News Director Bob Rockstroh and Assistant News Director Amy Fabozzi-Mattison informed me that I could continue the show, but that I would receive no producers and would have to produce the show on my own. I complained to Human Resources Director Hillary Patz about the fact that I had no producers for this show, while Rick Hancock, the male reporter

---

in charge of the show immediately prior to my taking over the show, did have producers. Since that conversation, up to and including the present, I have had to produce all of the weekend shows on my own, with no outside support.

14. Throughout the winter of 2006, Graziano and I spent time together socially, including going out for drinks and for dinner. I believed that these meetings were of a social, but not romantic, nature. In late February 2006, however, I became concerned that my coworkers may have believed the relationship to be romantic in nature, and approached Graziano with that concern. Graziano's response was to tell me that "if anything were to happen, [I] couldn't tell anyone."

15. In March 2006, I complained during my contract negotiations that I believed that I was being underpaid in comparison to my male counterparts. During the negotiations with Graziano, I was offered a salary increase. In addition, Graziano stated that the respondent had reviewed the pay scale and determined that as the longest-tenured reporter at the station, I was indeed underpaid. Following negotiations, I signed a three-year contract with the respondent, from June 2006 through June 2009.

16. Following contract negotiations, in June 2006, I disclosed to the respondents my coworkers that I was pregnant and due to have a baby in December 2006. I was not married when I got pregnant, at any time prior to getting pregnant, or at any time since becoming pregnant.

---

17. During my pregnancy, Graziano joked to my coworkers that he was the father of my baby. He was not the father of my baby. Graziano also told at least one other reporter to start the rumor stating how "cool" it would be if the news reported that the General Manager of the station got the Political Reporter pregnant. On a few occasions, I played along with Graziano's statement in a joking manner, in part because I felt pressure to stay in Graziano's good graces since he was my boss.

18. My daughter was born on or about December 18, 2006. I took maternity leave from on or about December 18, 2006 through on or about April 9, 2007.

19. In April 2007, when I first returned from my maternity leave, my direct supervisor, Bob Rockstroh, stated that I needed to stop telling people that Graziano was the father of my baby and to stop e-mailing Graziano. I stated that I had not started that joke.

20. Following this April 2007 conversation with Rockstroh, including my return from maternity leave and throughout the duration of my employment, I kept a greater distance between myself and Graziano, including limiting personal communications outside the workplace.

21. Throughout my maternity leave, I received phone calls, emails and text messages from Graziano seeking to touch base and asking me to "give him a buzz." I received most of these communications between 6 p.m.-11 p.m. I responded to many of these requests for communication.

---

22. Several months following my return from maternity leave, in approximately fall 2007, one of the respondent's photographers, Earl Glazier, told several people on more than one occasion that I had gotten fat and that someone needed to tell me I was fat. When I was told about this comment, I immediately went to Human Resources and filed a complaint with Human Resources Manager Hillary Patz. On information and belief, no corrective action was taken and I was required to continue working with Glazier.

23. Following the birth of my daughter, in approximately June 2007, the father of my baby terminated his parental rights and was not and is not involved in my daughter's life at all.

24. On or about December 28, 2007, I was informed by news Director Bob Rockstroh that Laurie Perez, a reporter with no children and with less experience than me, would go to Iowa to cover the Iowa Caucus. I had pitched this story several times. I asked Rockstroh why, as the political reporter, I was not selected to go to Iowa, and I also expressed my disappointment that Laurie, and not I, was selected to go. On or about December 31, 2007, Rockstroh replied that he and Assistant News Director Amy Fabozzi-Mattison had not selected me because of "childcare issues," including that I had "stress" about getting to the daycare center on time. I did not then, and do not now, have my daughter in a daycare center.

25. On or about December 2007, Sam Zell became the President and Chief Executive Officer of the Tribune Company. On or about January 2008, Zell sent a memo to employees titled "The C-Word." On information and belief, the "c-Word" is a widely used

---

term in the news and media industry for the word “cunt,” which is considered an incredibly offensive term that reporters at the station have been instructed never to use. Zell’s January memo used the phrase “the c-word” throughout the memo, and the memo expressed concern that station employees were using that term. The last sentence of the memo stated that the “c-word” actually referred to the word “can’t.”

26. On or about January 18, 2008, the respondent distributed a memorandum to employees titled “Creative Harassment.” The memo contained examples of what constitutes sexual harassment, and what does not. The memo stated: “Here’s a copy of the just-released ‘Tribune Policy Manual & Employee Handbook,’ which goes out of its way to (re) define ‘Harassment, Sexual & Otherwise.’” Among other things, the new policy stated “working at Tribune means accepting that sometimes you might hear a word that you, personally, might not use. You might experience an attitude that you don’t share. You might hear a joke that you might not consider funny. That is because a loose, fun, non-linear atmosphere is important to the creative process. This should be understood, should not be a surprise and is not considered harassment. Harassment means that you are being told that a raise, promotion or other benefit is dependent on you going on a date with your boss or some other activity. . . . Some people don’t know the line between lighthearted fun and annoying behavior.” On information and belief, the creative harassment policy was one of many changes to the respondent’s employee policy manual, which included the statement: “Essentially, as of December 20, 2007, Tribune company is a new company. Therefore, it’s fair to give you some help understanding the new culture we will be creating together, and how your judgment will be judged.”

---

27. On or about February 6, 2008, Fabozzi-Mattison brought up an issue relating to the biological father of my baby in front of me and my coworkers and asked me several very personal questions regarding the situation. This was extremely embarrassing to me.

28. In approximately August 2008, I set up a facebook page that serves, among other functions, as promotion for Fox 61. On information and belief, I was one of the first Fox 61 news reporter to set up a public facebook page without first being told to do so.

29. In approximately September 2008, I approached Rockstroh about my concerns that the respondent was committing ethical violations related to receiving payment for news stories. I was told by Rockstroh that "you are not going to win this one."

30. In approximately October 2008, I changed the name of my weekend news show to "The Real Story." Despite my repeated requests, the station never promoted the show as promised or per my suggestions in order for the show to receive better ratings. One of my repeated suggestions and requests was that my show be moved to a better time slot, at 10 a.m. Sunday, which would follow national political show with Chris Wallace.

31. In approximately October 2008, in part due to my frustration with the station's lack of promotion for "The Real Story," I started a blog, "Pampers and Politics." I update the blog and add content on my free time and use a computer and other equipment that I purchased. My blog coverage includes many Fox 61 promotions. On information and belief, I was the first Fox 61 reporter to start a blog. To date, I have had approximately

---

50,000 "hits," or visitors, to my blog.

32. A few months after starting my blog, in approximately January 2009, twenty-six year old reporter Jennifer Lahmers, who is frequently promoted by the respondent in her own TV spots, started a blog called "Jen and the City." On information and belief, the respondent hired a professional photographer to take pictures of Jennifer for her blog. Despite my requests, I have never been professionally photographed for my blog. I take all blog pictures with my personal digital camera.

33. In approximately January 2009, thirty eight-year old weekend anchor Laurie Perez was removed as the weekend anchor and replaced by approximately twenty-three year old Sarah French. On information and belief, Graziano stated to Perez that if Perez was upset about the removal as weekend anchor, that she could quit, since Graziano could hire two new younger reporters for Perez's salary.

34. On information and belief, French is a recent college graduate and former beauty pageant competitor. On information and belief, in approximately February 2009, news director Bob Rockstroh and General Manager Rich Graziano were showing male employees bikini pictures of French from her pageant competitions.

35. On or about January 30, 2009, during a meeting with reporters and anchors, on information and belief, Rockstroh stated that the Friday newscasts looked like "Big Boob Fridays," and that as a result of at least one female reporter wearing a tighter shirts on

---