
*** TX REPORT ***

TRANSMISSION OK

TX/RX NO 0357
RECIPIENT ADDRESS 19015440111
DESTINATION ID
ST. TIME 04/03 13:40
TIME USE 01'46
PAGES SENT 9
RESULT OK

CHANGE to WIN

1900 L Street, NW Suite 900 Washington, DC 20036 Tel: 202.721.0660 Fax: 202.721.0661 www.changetowin.

FAX COVER SHEET

Date: 4/3/18 Pages: 9 (incl. cover)

To: EEOC Memphis District Office From: Laura Padon

Phone: Phone: (202) 721-6049

Fax: (901) 544-0111 Fax: (202) 721-0661

Re: three EEOC charges cc:

Urgent For Review Please Comment Please Reply Please Recycle

Comments:

Enclosed please find EEOC charges filed by Angel Caldwell, Saquita Pryor, and Tierica Smith.

CHANGE to WIN

1900 L Street, NW ☐ Suite 900 ☐ Washington, DC 20036 ☐ Tel: 202.721.0660 ☐ Fax: 202.721.0661 ☐ www.changetowin.com

FAX COVER SHEET

Date:	4/3/18	Pages:	9 (incl cover)
To:	EEOC Memphis District Office	From:	Laura Padua
Phone:		Phone:	(202) 721-6049
Fax:	(901) 544-0111	Fax:	(202) 721-0661
Re:	three EEOC charges	cc:	
<input type="checkbox"/> Urgent <input type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle			

Comments:

Enclosed please find EEOC charges filed by Angel Caldwell, Saquita Pryor, and Tierica Smith.

April 3, 2018

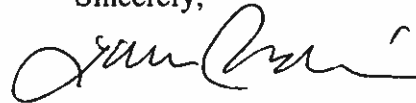
Equal Employment Opportunity Commission
Memphis District Office
1407 Union Avenue, 9th Floor
Memphis, TN 38104
Fax: (901) 544-0111

Re: EEOC Charge and Notice of Representation for Angel Caldwell

Dear Memphis EEOC District Office:

I write to certify that I am the legal representative for Angel Caldwell, who is filing an EEOC charge today against her former employer XPO Logistics. Enclosed with this letter is the charge signed by Ms. Caldwell. Please direct any and all future notices and communications regarding this charge to me. I can be reached at (202) 721-6049 or laura.padin@changetowin.org.

Sincerely,



Laura Padin
Attorney

<h2 style="margin: 0;">CHARGE OF DISCRIMINATION</h2> <p style="font-size: small; margin: 0;">This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	Charge Presented To: Agency(ies) Charge No(s): <input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC
--	--

Tennessee Human Rights Commission and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.) Ms. Angel Caldwell	Home Phone (Incl. Area Code) 901-674-2218	Date of Birth 2/18/94
---	---	---------------------------------

Street Address 5011 William Carey Drive, Memphis, TN 38127	City, State and ZIP Code Memphis, TN 38127
Email: angel_caldwell14@yahoo.com	

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name XPO Logistics	No. Employees, Members Approx. 350	Phone No. (Include Area Code) (901) 462-2000
------------------------------	--	--

Street Address 4895 Citation Drive, Memphis, TN 38118	City, State and ZIP Code Memphis, TN 38118
---	--

Name	No. Employees, Members	Phone No. (Include Area Code)
------	------------------------	-------------------------------

Street Address	City, State and ZIP Code
----------------	--------------------------

DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)	DATE(S) DISCRIMINATION TOOK PLACE Earliest: 10/2017 Latest: 12/2017 <input type="checkbox"/> CONTINUING ACTION
---	--

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Ms. Caldwell was employed by XPO Logistics from August 13, 2017 to March 5, 2018. Her position was picker, and she typically worked the day shift, from 6am to 6pm five days per week.

In late October or early November 2017, a supervisor named Eddie began to sexually harass Ms. Caldwell on a daily basis. He made inappropriate comments about her body or sexual acts. For example, he said that he liked how she looked in work pants and that he liked to be spanked in bed. He also rubbed up against her and rubbed her neck and shoulders several times, even though she told him to stop.

On one occasion, when she was talking with a female coworker about how hot it was in the facility and how ice cream would be nice, he interrupted and said: "I have something . . . but it's not ice cream." On another occasion, when Ms. Caldwell did not attend an event outside of work with coworkers, Eddie later told her he was frustrated because he had only gone to the event because he thought she would be there.

Ms. Caldwell told another supervisor, Caesar S., about Eddie's inappropriate behavior and her discomfort with it. Caesar took no corrective action. Instead he joked about Eddie's behavior and referred to Eddie as "the guy that looks at all the girls' butts all day."

[See additional page for more information.]

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTAR, Y - When necessary for State and Local Agency Requirements
---	---

I declare under penalty of perjury that the above is true and correct.	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 COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)
--	---

03/28/18
Angel Caldwell

Date
Charging Party Signature

[Continued from previous page]

The harassment ended in mid December 2017, after Eddie and Ms. Caldwell had a verbal altercation about understaffing at the facility and Ms. Caldwell walked off the line. Eddie erroneously reported that she had quit and put in her two weeks' notice. Ms. Caldwell believes that he said this to retaliate against her for shunning his advances. After she returned to work, he ignored her.

03/28/18
Date

Angel Caldwell
Charging Party Signature

April 3, 2018

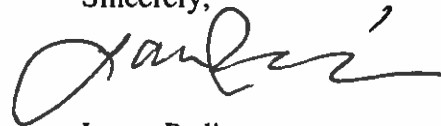
Equal Employment Opportunity Commission
Memphis District Office
1407 Union Avenue, 9th Floor
Memphis, TN 38104
Fax: (901) 544-0111

Re: EEOC Charge and Notice of Representation for Jaquita Pryor

Dear Memphis EEOC District Office:

I write to certify that I am the legal representative for Jaquita Pryor, who is filing an EEOC charge today against her former employer XPO Logistics. Enclosed with this letter is the charge signed by Ms. Pryor. Please direct any and all future notices and communications regarding this charge to me. I can be reached at (202) 721-6049 or laura.padin@changetowin.org.

Sincerely,



Laura Padin
Attorney

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: _____ Agency(ies) Charge No(s): _____

- FEPA
- EEOC

Tennessee Human Rights Commission

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Jaquita Pryor

Home Phone (Incl. Area Code)

901-513-1945

Date of Birth

3/9/95

Street Address

City, State and ZIP Code

2734 Southern Avenue, Memphis TN 38111

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

XPO Logistics

No. Employees, Members

Approx. 350

Phone No. (Include Area Code)

(901) 462-2000

Street Address

City, State and ZIP Code

4895 Citation Drive, Memphis, TN 38118

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

- RACE
- COLOR
- SEX
- RELIGION
- NATIONAL ORIGIN
- RETALIATION
- AGE
- DISABILITY
- GENETIC INFORMATION
- OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest: 6/2017 Latest: 2/2018

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Ms. Pryor was employed by XPO Logistics from March 11, 2017 to March 2018. Her position was verifier, and she usually worked the day shift, typically ten to twelve hours five days per week.

During her employment at XPO, Ms. Pryor received inappropriate sexual comments from three supervisors. In the summer of 2017, a second shift supervisor named Greg told her that she was "so beautiful" and that she had "nice lips." Also during the summer of 2017, a first shift supervisor whose name she does not recall commented to her that he was happy that many of the women workers wear tight pants. And, from October 2017 to February 2018, a supervisor named Eddie made daily comments to her about her appearance or his interest in her sexually. On more than one occasion Eddie asked for her number or asked her to go out with him after work. In February 2018, he again asked for her number because he said he would be leaving his employment at XPO and would not see her again.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

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

NOTARY - When necessary for State and Local Agency Requirements

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 COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

3-28-2018

Date

Jaquita Pryor
Charging Party Signature

April 3, 2018

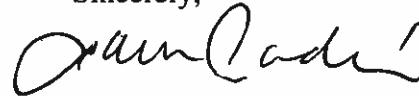
Equal Employment Opportunity Commission
Memphis District Office
1407 Union Avenue, 9th Floor
Memphis, TN 38104
Fax: (901) 544-0111

Re: EEOC Charge and Notice of Representation for Tierica Smith

Dear Memphis EEOC District Office:

I write to certify that I am the legal representative for Tierica Smith, who is filing an EEOC charge today against her former employer XPO Logistics. Enclosed with this letter is the charge signed by Ms. Smith. Please direct any and all future notices and communications regarding this charge to me. I can be reached at (202) 721-6049 or laura.padin@changetowin.org.

Sincerely,



Laura Padin
Attorney

[Continued from previous page]

In late November or early December 2017, Ms. Smith informed another supervisor, Caesar, of the inappropriate sexual comments that Eddie made constantly. Caesar responded that Ms. Smith should stick it out because management intended to transfer Eddie to another line soon. No action was taken to address Ms. Smith's concerns.

In January or February 2018, in one of their last interactions, Eddie told Ms. Smith that she was "not smart enough to go to HR on me" and that she could "kiss my ass", then he bent over. Soon after, Eddie ceased working at XPO.

Two other employees, Angel Caldwell and Dominique Bowen, witnessed some of Eddie's inappropriate behavior and comments toward Ms. Smith.

03-28-18 Jierica Smith
Date Charging Party Signature