

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

VICTORIA BURHANS and CHLOË RIVERA

Index No.

Plaintiff(s),

Summons

-against-

THE STATE OF NEW YORK

Date Index No. Purchased:

Defendant(s).

To the above named Defendant(s)

THE STATE OF NEW YORK
c/o The Office of The Attorney General
120 Broadway, 24th Floor
New York, New York 10271

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

The basis of venue is CPLR Section 503(a)
which is defendant's place of business

Dated: New York, New York

March 27, 2014

Law Office of Kevin Mintzer, P.C.

by Kevin Mintzer
Kevin Mintzer

Attorneys for Plaintiff
Victoria Burhans and Chloë Rivera

1350 Broadway, Suite 1400
New York, New York 10018

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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VICTORIA BURHANS and CHLOË RIVERA,

Index No. _____

Plaintiffs,

-against-

COMPLAINT

THE STATE OF NEW YORK,

Defendant.

-----x

Plaintiffs Victoria Burhans (“Burhans”) and Chloë Rivera (“Rivera”) (collectively, “plaintiffs”), by their counsel, The Law Office of Kevin Mintzer, P.C., complaining of defendant The State of New York (the “State” or “defendant”), allege as follows:

NATURE OF CLAIMS

1. Vito Lopez (“Lopez”), a former member of the New York State Assembly (“Assembly”), used his public office to commit egregious acts of sexual harassment against Burhans and Rivera, two women who worked in his district office. Lopez’s harassment of plaintiffs included, among other things, unwanted physical contact, unwanted sexual advances, and incessant comments about their bodies, clothing and appearance. Lopez would not have been able to abuse plaintiffs without the assistance of one of the most senior officials in the State, Assembly Speaker Sheldon Silver (“Silver”). Months before Lopez hired plaintiffs, Silver and his senior staff learned that at least two other women on Lopez’s staff had credibly complained that Lopez had sexually harassed them and other employees. Rather than refer those initial two

complaints to the Assembly’s Committee on Ethics and Guidance (“Ethics Committee”), as was required by the Assembly’s sexual harassment policies, Silver and Lopez instead orchestrated a confidential payment to Lopez’s previous victims and conditioned that payment on the victims remaining silent. Silver and his staff made no attempt to investigate Lopez or to try to protect the other women on Lopez’s staff. As a result of Silver’s complete failure to meet his obligations as the most senior official in the Assembly, Lopez continued his deplorable conduct and sexually harassed Burhans and Rivera.

2. This action is brought to remedy discrimination on the basis of gender in employment, including hostile work environment sexual harassment, in violation of the New York State Human Rights Law, N.Y. Exec. Law § 290 *et seq.* (the “NYSHRL”).

PARTIES, JURISDICTION AND VENUE

3. Plaintiff Victoria Burhans is a 28 year-old woman. She is a resident of New York and, at all relevant times, has been employed by the Assembly.

4. Plaintiff Chloë Rivera is a 26 year-old woman. She is a resident of New York and, at all relevant times, has been employed by the Assembly.

5. The Assembly is part of the legislature of the State of New York and maintains offices in New York County. As described in greater detail below, the State is plaintiffs’ “employer” within the meaning of N.Y. Exec. Law § 292(5).

6. This Court is an appropriate venue for this action pursuant to C.P.L.R. § 503(a).

FACTUAL ALLEGATIONS

Background Concerning Lopez and Silver

7. Vito Lopez is a former Assemblyman from the 53rd Assembly District, which is located in Kings County. He held that office from 1985 until he resigned on May 20, 2013. While serving in the Assembly, Lopez was also an employee of the State.

8. While in the Assembly, Lopez was chair of the Assembly's Standing Committee on Housing for more than 15 years before he was removed from that position on August 24, 2012. Prior to that time, Lopez had been one of the most senior and powerful Members of the Assembly. In comparison to other Assembly Members, Lopez had one of the largest budget allocations for his staff.

9. From approximately 2005 through late 2012, Lopez was also the Chairman of the Kings County Democratic Committee, which is one of the largest county affiliates of the Democratic Party in the United States.

10. On information and belief, Lopez has for decades also maintained enormous influence on the operations of the Ridgewood Bushwick Senior Citizens Council ("RBSCC"), a non-profit organization Lopez founded in approximately 1973. RBSCC has for many years received millions of dollars in grants from state and city government.

11. Due to his position in the Assembly and on the Kings County Democratic Committee as well as his influence on RBSCC, Lopez was one of the most powerful public officials in Brooklyn. Lopez "long presided over a political machine that rewarded protégés and friends with jobs, benefited favored contractors and bolstered his standing as one of the last of the city's political kingmakers." N.R. Kleinfield et al., *If this Brooklyn Kingmaker is Asking, Saying No is Risky Option*, N.Y. Times, Sept. 5, 2012 at A1.

12. Silver has served in the Assembly since 1977 and has been Speaker of the Assembly since 1994. During Silver's tenure as Speaker, he has been one of the most senior and powerful officials of the State.

13. Under the Rules of the Assembly, the Speaker has sweeping powers over the institution and other members, including but not limited to the right to name chairpersons and members of the various committees of the Assembly, the right to decide which bills are considered by the body, and the ability to control all Assembly property.

14. Silver further exercises power in the Assembly "by rewarding his loyal supporters with higher-paying leadership posts, placing his allies throughout state government and using his considerable campaign war chest and redistricting know-how to assist any endangered Democratic candidates." Danny Hakim and Thomas Kaplan, *Very Bad Week is Merely a Bump for Assembly's Master of Power*, N.Y. Times, May 20, 2013 at A1. In addition, Silver controls "where members park, the size and location of their offices and how much money they can spend on their staffs. [Silver] also can increase, or decrease, their pay, by offering them myriad leadership posts." *Id.*

15. Under the Rules of the Assembly, the Speaker is required to promulgate a sexual harassment policy prohibiting sexual harassment by members of the Assembly and Assembly staff and to establish a process for the resolution of sexual harassment complaints. A copy of the policy in effect in 2011 and 2012 is attached hereto as Exhibit A (the "Policy"). The Policy states that federal and state laws prohibit sexual harassment in employment and that the law imposes legal responsibilities on the "Assembly itself as employer."

16. Despite the existence of the Policy, Silver has a history of not taking appropriate actions in response to credible allegations of sexual harassment. Indeed, prior to

plaintiffs becoming employed by the Assembly, Silver had created a *de facto* policy or custom in which sexual harassment by senior officials within the Assembly was tolerated or condoned.

17. In or about 2001, an employee of the Assembly, Elizabeth Crothers, reported to Silver that Michael Boxley (“Boxley”), Silver’s chief counsel, had sexually assaulted her. Silver failed to ensure that a proper investigation was done or to take any meaningful action against Boxley. Two years later, Boxley, who still worked for Silver, was arrested for raping another female Assembly employee (“Jane Doe”). Boxley ultimately pleaded guilty to having sexual intercourse with Jane Doe without her consent. Years later, having done nothing to help Elizabeth Crothers when he had the power to do so, Silver claimed he had “tremendous anguish about what Elizabeth Crothers went through.”

18. In 2004, Jane Doe brought an action for sexual harassment in the Supreme Court of the State of New York, Albany County, under the NYSHRL against the State and Silver, among other parties. The defendants in that case moved to dismiss Jane Doe’s complaint on the grounds that, *inter alia*, they did not have actual knowledge that Boxley had engaged in any sexual harassing conduct toward plaintiff before she reported the rape. The Court rejected the argument.

19. Following the Court’s decision, Jane Doe’s action settled before trial. As part of the settlement, the parties agreed to certain amendments of the Assembly’s sexual harassment policy. Those changes were supposed to provide additional protections to Assembly employees who experienced sexual harassment. In fact, however, Silver and his senior staff continued to follow a *de facto* policy or custom in which sexual harassment by senior officials within the Assembly was tolerated or condoned.

20. In 2009, a junior staff member of Assemblyman Micah Kellner (“Kellner”) complained to a senior member of Kellner’s staff that Kellner was sexually harassing her. That senior aide reported the staff member’s complaint to Williams Collins (“Collins”), who was then Chief Counsel for the Majority and who reported directly to Silver. The senior aide also provided Collins with approximately 15 pages of instant message chat transcripts between Kellner and the junior staff member reflecting that Kellner had made inappropriate and sexually suggestive remarks. Despite this, the Assembly failed to conduct any investigation into the complaint or to take any measures to ensure the safety of Kellner’s staff members. This failure to act was in keeping “with a longstanding practice in the chamber of shielding members from embarrassment.” Danny Hakim, *Assembly Lawyer to Step Down Over Failure to Investigate Sex Harassment Claims*, N.Y. Times, July 23, 2013 at A21.

The Assembly and Silver Cover Up Credible Allegations of Sexual Harassment Against Lopez

21. On or about December 8, 2011, months before plaintiffs began working for the Assembly, a woman on Lopez’s staff communicated to Yolande Page (“Page”), the Assembly’s Deputy Director of Administration, that Lopez had been sexually harassing her and other women on his staff. The woman (hereinafter “Complainant 1”) further communicated to Page specific details about Lopez’s inappropriate conduct and asked Page whether Silver could talk to Lopez to make him stop.

22. At the time that Complainant 1 spoke with Page, the Assembly’s Sexual Harassment/Retaliation Policy stated the following concerning sexual harassment complaints against members of the Assembly:

A complaint of sexual harassment and/or retaliation against a Member of the Assembly *shall* be referred to the Assembly Committee on Ethics and Guidance for investigation. The

Committee *shall* conduct its investigation in the same manner described above with respect to investigation conducted by counsel. Upon conclusion of the investigation, the Committee *shall* report its findings to the Speaker and, as appropriate, the Minority Leader, accompanied by recommended remedy, or dispose of the matter in accordance with its policy regarding disciplinary matters.

(Emphasis supplied).

23. Contrary to the requirements of the Policy, Page informed Complainant 1 that if she wanted to make a formal complaint against Lopez, she was required to contact the Assembly's Office of Counsel for the Majority.

24. On or about December 12, 2011, Complainant 1 spoke with Page again. Complainant 1 told Page that Lopez had fired her when Complainant 1 told him to stop sexually harassing her and then rescinded the termination. Complainant 1 also told Page that Lopez was harassing other women in the office. In response, Page reiterated that if Complainant 1 wanted to pursue a complaint against Lopez, she needed to contact either Collins or Carolyn Kearns ("Kearns"), Deputy Counsel for the Majority and Majority Counsel to the Ethics Committee. Kearns reported to Collins.

25. On or about December 12, after Page spoke with Complainant 1, she had a telephone conversation with Silver and informed him that she had spoken with an employee in Lopez's office and there may be sexual harassment litigation filed. Thereafter, Silver mentioned to Collins and Jim Yates, Counsel to the Speaker, that there might be an issue or incident in Lopez's office.

26. On December 14, Complainant 1 sent an email to Lopez and copied it to Page, Collins and Kearns. In the email, Complaint 1 wrote, in part:

As you are fully aware, you fired me on Sunday, after a series of escalating incidents in which I repeatedly denied your sexual

advances and told you to stop making sexual and other inappropriate remarks to me and other staff or to retaliate against me, and after I reported your behavior last week to human resources.

27. After Collins and Kearns received copies of Complainant 1's email, they spoke with Page, who told them about her previous communications with Complainant 1, including the specific behaviors of Lopez that Complainant 1 had told her about. Page also told Collins and Kearns that Complainant 1 was extremely distraught.

28. On or about December 28, 2011, a second woman who worked on Lopez's staff (hereinafter, "Complainant 2") asked Page if she could file a sexual harassment complaint against Lopez. Page referred Complainant 2 to Collins.

29. Complainant 2 thereafter had a phone conversation with Collins and Kearns in which she detailed instances of Lopez's inappropriate conduct toward her and other female staff members. Complainant 2 also stated that she wished to file a formal complaint against Lopez. Collins and Kearns requested that Complainant 2 put her complaint in writing.

30. On January 3, 2012, Complainant 2 sent an email to Collins in which she documented her complaint against Lopez. The document began as follows:

Here is a brief written follow-up to our phone conversation. In sum, Assemblymember Lopez has repeatedly made unwanted, unwelcome sexually suggestive comments directed at me and several members of the staff, as well as generally treating the female members of the staff differently from the male staff members in ways that negatively impact how and whether the female members of staff are able to do their work. When a female employee does not accept his inappropriate behavior, he retaliates by telling them that they "have the wrong attitude" or "don't care about their job" and suggests or threatens that they might be better off working in another office.

31. The document written by Complainant 2 listed many examples of inappropriate comments by Lopez personally witnessed by Complainant 2, as well as other examples of inappropriate comments by Lopez conveyed to her by other employees in the office.

32. On information and belief, one or more members of Silver's staff made Silver aware that Complainant 2 had filed a written complaint about Lopez with the Majority Counsel's office. Nevertheless, the complaint of Complainant 2 was never forwarded to the Ethics Committee.

33. On or about January 12, 2012, attorneys for Complainant 1 and Complainant 2 delivered a letter to Lopez and Kearns containing further detail concerning the sexual harassment and retaliation complaints by Complainant 1 and Complainant 2. The second paragraph of the letter contained the following summary:

The discrimination is rampant within Lopez's Brooklyn office and comes in all guises. It is evident that Lopez undertakes to ensure that he is surrounded by staff comprised predominantly of attractive, young women, and that he rewards those who are willing to play his sexual games, and punishes those who do not.

After providing further detail about the manner in which Lopez treated the women on his staff, the letter continued:

In short, Lopez plainly makes it a requirement of the job for certain — if not all — of the younger female staff to use their bodies and have a "flirtatious" manner. If those women refuse to do so, or attempt to push back in even the most respectful, professional ways, they are punished and held back, and told that they are not "enthusiastic" or "do not fit in."

The letter also described how Lopez made sexual advances to Complainant 1 and other women and then punished them for refusing to comply:

In particular, Lopez has made sexual advances to several of his female underlings, and punished them when they refuse his advances. [Complainant 1] has suffered this on repeated occasions. In particular, Lopez has gradually ramped up his

advances, from first insisting that she "meet" with him to discuss work after hours at bars, to indicating that he would only take her on trips if she were more positive towards him, to insisting that she share a hotel room with him, stating that they should "cuddle" and directly telling her repeatedly that he is attracted to her and that the only way she could succeed at her job is if she "leaves a window of opportunity" open for the two of them to be romantically involved. While [Complainant 1] undertook every effort to keep the relationship professional, Lopez repeatedly attempted to turn it into a sexual one, saying frequently that his relationship with his girlfriend is not working out and [he] "needs someone in the worst way." Each time [Complainant 1] rebuffed Lopez's advances, the retaliation was as swift as it was certain: she would be taken off projects, told that she would be demoted, or yelled and screamed at and told for hours that she did "not have the right attitude."

The letter also stated that Lopez was engaging in acts of sexual harassment and other discriminatory behavior toward other women working in his office. The letter did not state or in any manner suggest that Complainant 1 and Complainant 2 would not cooperate with an Assembly's investigation into Lopez's conduct or that they did not wish such an investigation to occur.

34. In January 2012, at the suggestion of Yates, Collins spoke with Arlene Smoler ("Smoler"), a Deputy Attorney General in the Office of Attorney General Eric Schneiderman, about the circumstances of the sexual harassment and retaliation complaints made by Complainant 1 and Complainant 2. Smoler has significant experience in employment law. Collins sought Smoler's advice about, among other subjects, the Assembly's potential liability to Complainant 1 and Complainant 2.

35. Collins described the situation to Smoler in general terms without identifying any of the particular individuals involved. In response, Smoler advised Collins, among other things, that the Assembly had a legal obligation as an employer to conduct a

“prompt and timely” investigation into the sexual harassment allegations of Complainant 1 and Complainant 2.

36. On January 24, 2012, Silver met with Collins, Yates, and Kearns. All four participants of the meeting, including Silver, are attorneys admitted to practice law in the State of New York.

37. At the meeting, Collins recounted the advice he received from Smoler. Collins also said that, based on his own legal research, he believed the Assembly may have had a legal obligation to investigate the allegations against Lopez as soon as Complainant 1 first complained to Page.

38. Despite Collins’ statements, neither Silver nor anyone on his staff referred the allegations made by Complainant 1 or Complainant 2 to the Ethics Committee. Nor did Silver otherwise initiate a “prompt and timely” investigation regarding the allegations of Complainant 1 and Complainant 2, as Smoler had advised.

39. At no time before Burhans and Rivera complained of Lopez’s sexual harassment, *see* ¶¶ 65-68, *infra*, did Silver or anyone on his staff discipline Lopez for his behavior or to take other meaningful action to prevent him from engaging in further acts of sexual harassment.

40. In or about March 2012, another female employee on Lopez’s staff (“Employee 1”) told Kearns that she wanted to be transferred to a different job in the Assembly, but she did not want Lopez to know that she wanted to leave his office. Kearns observed that Employee 1 was very stressed and urgently wanted to leave Lopez’s office.

41. The reason that Employee 1 appeared to be in distress was that Lopez had been sexually harassing her. Although Employee 1 did not wish to make a formal sexual

harassment complaint, Kearns knew or should have known that Lopez had sexually harassed Employee 1. Nevertheless, Silver and the Assembly still took no action to investigate Lopez or to ensure that the other women in his office were safe.

42. Instead of taking action to stop an elected official who was sexually harassing his female staffers, Silver and his staff tried to cover up Lopez's actions and protect Lopez and the Assembly from public scrutiny. On information and belief, Silver was more concerned about avoiding adverse media attention than he was about protecting employees of the Assembly and the State from sexual harassment.

43. In or about April or May 2012, Silver and his staff arranged for Employee 1 to be transferred out of Lopez's office to a position on the Assembly's central staff.

44. Following a private mediation process, the Assembly and Lopez agreed to pay Complainant 1 and Complainant 2 a combined total of \$135,080 in settlement of their potential claims. The Assembly paid \$103,080 of the settlement with State funds; Lopez paid the balance. The settlement also provided that Lopez and his staff would be required to attend a "supplementary instruction" regarding the Assembly's discrimination and harassment policies within 90 days of the settlement.

45. The settlement payment by Lopez was not required by the Assembly and was not a measure imposed by the Assembly to stop Lopez from sexually harassing Assembly or State employees. Rather, Lopez made the payment in order to obtain, among other benefits, a release of all potential legal claims that Complainant 1 and Complainant 2 might have pursued against him. Likewise, the "supplementary instruction" that Lopez agreed to in the settlement was not a requirement of the Assembly or the State. Instead, the training was included in the settlement at the insistence of Complainant 1 and Complainant 2. The "supplementary

instruction” did not actually take place until August 23, 2012, which was well after Lopez had sexually harassed plaintiffs and they had left his staff. See ¶¶ 57-68, *infra*.

46. As part of the settlement, the Assembly and Lopez insisted that the Complainant 1 and Complainant 2 agree to complete confidentiality about the terms of the settlement, the fact of the settlement, and their allegations against Lopez. The inclusion of this confidentiality clause was contrary to the policy of the Attorney General not to include confidentiality provisions in settlement agreements. The Assembly knew of and intentionally chose to disregard this policy. As a result of the confidentiality provision, neither Complainant 1 nor Complainant 2 were permitted to make any public statement about Lopez’s deplorable behavior or even to warn the other employees in Lopez’s office about Lopez.

47. During the course of the mediation process with Complainant 1 and Complainant 2, Silver and his senior staff learned that the Complainants had accumulated significant evidence of Lopez’s outrageous behavior, including audiotapes of Lopez engaging in sexual harassing conduct. Despite this knowledge, Silver and his senior staff took no action to discipline Lopez or to protect the other employees in Lopez’s office. The settlement among the Assembly, Lopez, Complainant 1, and Complainant 2 was finalized and executed in early June 2012. By this time, Lopez had hired Burhans and Rivera as the effective replacements of the initial complainants and, completely unchecked by the Silver and his senior staff, had begun to sexually harass them as well.

Plaintiffs’ Employment with the Assembly and State

48. On or about April 16, 2012, the Assembly hired Burhans as a Legislative Aide on Lopez’s staff. In order to take the position with Lopez, she resigned from her previous

employment as a Legislative Aide for a prominent union and moved from the Albany area to New York City. At the time, Burhans was 26 years old.

49. On or about April 17, 2012, the Assembly hired Rivera as a Legislative Aide on Lopez's staff. At the time, she was 24 years old. Prior to working for the Assembly, Rivera held internships with a member of the New York City Council and the Legal Services Corporation. Rivera had also held full-time positions with a real estate firm and an interior design business; at both companies Rivera had significant administrative and managerial responsibilities.

50. At the outset of plaintiffs' employment with the Assembly, plaintiffs were provided with "New York State Employee" identification cards and a book of Assembly rules and policies entitled "New York State Assembly 2011-2012 Employee Information Guide." The first page of the book was a letter from Silver addressed to "New York State Assembly Employee." The letter begins as follows:

I am pleased that you have chosen to become a part of the New York State Assembly. This Employee Information Guide outlines the rules, regulations and benefits for all Assembly employees.

51. Plaintiffs were subject to and required to comply with all of the rules and policies included in the Employee Information Guide, including policies related to time and attendance, vacation leave, sick leave, dual government employment, and fraternization with interns. If plaintiffs did not comply with those policies and rules, Silver and/or his designees could subject them to discipline, including dismissal.

52. The Employee Information Guide contained also contained the Assembly's Sexual Harassment Policy. Under that Policy, Silver, as Speaker, is empowered to

impose discipline, including termination, on any Assembly employee who engages in sexual harassment. (See Exhibit A)

53. From the outset of their employment with the Assembly, plaintiffs have been required by Assembly policy to submit weekly timesheets to the Assembly's central staff on forms entitled: "New York State Assembly Employee Time Sheet." On information and belief, the Assembly's central staff maintains copies of plaintiffs' timesheets, as well as other employment-related information and records related to plaintiffs.

54. Silver and/or his designees control the amounts plaintiffs are paid in salary. The office of the New York State Comptroller issues bi-weekly payroll deposits to plaintiffs. Plaintiffs' annual W-2 wage and tax statements forms identify their employer as the "State of New York." Moreover, plaintiffs are participants in the New York State public employee pension system.

55. Before Burhans and Rivera began working for the Assembly, they each separately interviewed with Lopez. Neither Burhans nor Rivera had met Lopez before their interviews.

56. Plaintiffs were based out of Lopez's district office in Kings County, but plaintiffs' duties required them to go to various counties in the State of New York, including New York County.

Lopez Sexually Harasses Plaintiffs

57. Within six weeks of hiring plaintiffs, Lopez began to sexually harass them. As detailed below, Lopez's conduct included: a) repeated comments to plaintiffs about their physical appearance, their bodies, their attire, and their private relationships; b) repeated unwelcome sexual overtures; and c) repeated inappropriate and unwelcome physical contact.

58. Lopez used his position as a public official and employer to demand that plaintiffs accept, and even welcome, his outrageous behavior in order to keep their jobs. For example, Lopez repeatedly required plaintiffs to communicate to him -- often in writing -- that they cared for him, that they admired him, and that they loved their jobs and being with him.

59. On information and belief, Lopez sought these affirmations both because it gratified his ego to hear compliments from young women and because he sought to collect "evidence" that he could use against plaintiffs if they ever complained about his acts of sexual harassment.

60. Lopez also required that plaintiffs be available at virtually any hour of the day or night to respond to him. Moreover, he required Burhans and Rivera to spend countless hours, including late nights and weekends, in his presence. Lopez did not impose these requirements because of any work necessity, but simply because he wanted Burhans and Rivera to be near him for his personal gratification.

61. When plaintiffs submitted or acquiesced to Lopez's inappropriate behavior, he repeatedly said that he would raise their salaries, referred to each of them as his Chief of Staff, and dangled the prospect of promotions. However, when plaintiffs refused his requests or rebuffed his offensive behavior, Lopez often became enraged and threatened their jobs. Indeed, Lopez did not make either Burhans or Rivera the Chief of Staff of his district office because plaintiffs did not favorably respond to his sexual overtures and/or other inappropriate requests that Lopez made to gratify his sexual desires.

62. On more than one occasion, plaintiffs told Lopez that his conduct made them uncomfortable and asked him to stop, but he would not do so. By his words and deeds,

Lopez made it clear to plaintiffs that their submission to his sexually harassing conduct was a non-negotiable term of their employment.

Examples of Lopez's Harassment of Burhans

63. The following are examples of Lopez's sexual harassment of Burhans in the period between May 2012 and July 2012:

a. On multiple occasions while Lopez was driving and Burhans was in the passenger seat of his car, including a trip to Atlantic City described below, Lopez required Burhans to massage his hand. When Burhans submitted to that request, Lopez sometimes pushed his hand in between Burhans' legs, forcefully touching her inner thigh. Burhans would attempt to move Lopez's hand up and off of her, but Lopez would not stop.

b. Lopez frequently told Burhans that she should not wear a bra. On one occasion, Lopez told Burhans that she looked nice, but he would rather she not wear a bra, and then proceeded to snap her bra from the back.

c. While at the Bushwick United Democratic Club, Lopez asked Burhans if she would accompany him on a trip to Russia and sleep in the same bed with him. When Burhans communicated that she would not do that, Lopez became very upset and stormed out of the Club.

d. Lopez frequently and falsely accused Burhans of having a prior sexual relationship with a former supervisor of hers. Burhans asked Lopez to stop making such statements because it made her uncomfortable, but he persisted in doing so.

e. When in Albany, Lopez asked Burhans if she would kiss him if the Assembly passed certain legislation they had worked on. Burhans replied: "on the cheek," but Lopez insisted that it be on the lips.

f. On another occasion in which Burhans and Lopez were in Albany, he asked her if she would like to stay over at the Governor's Executive Mansion. Burhans replied that she would enjoy going on a tour of the Mansion. Lopez responded that she would have to stay overnight, which he referred to as a "Lincoln bedroom" situation. Lopez further stated that Burhans would need to be "naked" during the visit and suggested that this would be how he would get a housing bill enacted into law.

g. Lopez also said to Burhans that he was going to set her up with a senior member of the Governor's administration and that she should have sex with this man to get Lopez's housing bill passed.

h. Lopez required Burhans to accompany him on a trip to Atlantic City, a trip for which there was no work purpose. Before the trip, Lopez told Burhans that she should not wear a bra on the trip, which, as stated above, was a frequent obsession of his. When Burhans defied Lopez's instruction and wore a bra, Lopez became very angry and refused to talk to Burhans for hours.

i. When Lopez and Burhans arrived in Atlantic City, Lopez insisted that they go up to a room he had reserved at the Borgata Hotel in order to "freshen up." While they were in the hotel room, Lopez tried to kiss Burhans on the lips. Burhans repeatedly said "no" and "what are you doing" and had to push Lopez away several times before Lopez stopped his advances.

j. Lopez told Burhans that she should grow her hair out to make it look more like Rivera's hair. Lopez said to Burhans that Rivera "used her hair to be sexy."

k. Lopez told Burhans that she and Rivera were "well endowed" and that Burhans should "play that up."

1. On multiple occasions when Lopez was angry, he called Burhans a “bitch.”

m. On many occasions, Lopez told Burhans that she should wear short skirts to work and that she should use her sexuality in meetings, including crossing and uncrossing her legs to get a reaction. Lopez further said that watching the reactions of other people to Burhans excited him and turned him on.

Examples of Lopez’s Harassment of Rivera

64. The following are examples of Lopez’s sexual harassment of Rivera in the period between May 2012 and July 2012:

a. Lopez frequently asked Rivera to wear mini-skirts, button-down blouses and high heels for him.

b. Lopez told Rivera that he considered her the most attractive person in the office.

c. Lopez frequently asked Rivera to massage his hand for him, purportedly because he had lost feeling in it. On one occasion, Rivera submitted to this request and massaged his hand.

d. Lopez also asked Rivera to give him a manicure. According to Lopez, giving him a manicure would demonstrate that Rivera cared for and respected him.

e. Lopez required Rivera to meet with him twice a week after work at bars or restaurants, purportedly to discuss work-related matters. However, these meetings quickly devolved into matters unrelated to work, as Lopez told Rivera that he needed her to be his “therapy.” At these “therapy” sessions, Lopez told Rivera that she had beautiful eyes and that he liked being “with a hot chick.”

g. Lopez frequently tried to hold Rivera's hand. When Rivera pulled her hand away, Lopez became angry. On one occasion, Lopez grabbed Rivera's hand and when she tried to pull it away, Lopez tightened his grip and counted to sixty until he released Rivera. Rivera was crying during this countdown.

h. Lopez repeatedly spoke with Rivera about the problems he had in the relationship with his girlfriend, and how he was "floating from woman to woman." Lopez also constantly pried into Rivera's relationship with her boyfriend, and refused to accept that Rivera did not want to discuss it with him.

i. Lopez asked Rivera to accompany him to Atlantic City, purportedly for more "therapy" and because he wanted a "hot chick" to be with him.

j. After Burhans' rejected Lopez's invitation to go to Russia and share a bed with him, Lopez asked Rivera to take the trip with him. Lopez told Rivera that she would never be allowed to leave his side and that she would have to get drunk with him.

k. Lopez asked Rivera to accompany him on a five-day trip to Quebec, which was another trip with no work purpose. When Rivera turned down this request, Lopez became enraged and, as punishment, began to take away some of Rivera's work-related duties.

l. Lopez repeatedly told Rivera that her lack of romantic interest in him was because Rivera was purportedly a lesbian. In response, Rivera consistently replied that her sexual orientation was none of his business. Nevertheless, Lopez frequently told Rivera that he wanted to set her up with various lesbian elected officials. Lopez added that he thought this would be "very hot."

m. On many occasions, Lopez asked Rivera about her sexual history. When Rivera again told him that the subject was none of his business, Lopez became angry and told

Rivera that she was too conservative and that she should “stop putting up walls.” Lopez added that Rivera should be more like the “bra-burners of the 70’s.” Lopez also expressed dismay that Rivera was not sexually promiscuous and referred to her as “virginal.”

n. Lopez repeatedly asked Rivera to come to work without wearing a bra. At other times he suggested that Rivera should be topless. He also complained to Rivera that she pulled down her skirt when she sat down.

o. Lopez has played with Rivera’s hair and frequently stood inappropriately close to her.

p. Lopez frequently told Rivera that she did not dress sexily enough for his taste, and that she should learn how to “dress sexy” from a 14-year-old female intern who worked in Lopez’s Brooklyn office. To that end, Lopez attempted to arrange a shopping trip with Rivera and this intern, ostensibly so that the intern could show Rivera how to dress more to Lopez’s liking. When Rivera relayed these and other circumstances to her mother, Rivera’s mother became concerned about the welfare of Rivera and the intern and reported this to the 90th Police Precinct in Brooklyn, which sent officers to visit Lopez’s Brooklyn office.

Plaintiffs Leave Lopez’s Office and Complain of Sexual Harassment

65. On July 16, 2012, the same day that the police visited Lopez’s office, Rivera called the office of Counsel for the Majority and reported to Kearns that Lopez was sexually harassing her. Rivera did not thereafter return to Lopez’s office and, as a result of arrangements made by Silver and his senior staff, she was eventually transferred to another position in the Assembly. Although Rivera has remained an employee of the Assembly and the State, she has suffered a significant diminution in her job duties and responsibilities since leaving Lopez’s office.

66. For example, Rivera was Lopez's liaison to important constituencies in the community, including the Chasidic community, which was a significant part of Lopez's political base. Rivera regularly attended meetings with other elected officials and community leaders. Rivera also had substantial supervisory and managerial responsibilities in Lopez's district office. In contrast, in Rivera's current position working for another Member of the Assembly, her primary duties involve responding to ordinary constituent inquiries and complaints. She also performs secretarial tasks. Rivera has no managerial or supervisory role.

67. On July 17, 2012, one week after Lopez took Burhans to Atlantic City, Burhans called Kearns and reported that Lopez was sexually harassing her. Burhans did not thereafter return to Lopez's office and, as a result of arrangements made by Silver and his senior staff, she was eventually transferred to another position in the Assembly. Although Burhans has remained an employee of the Assembly and the State, she has suffered a significant diminution in her job duties and responsibilities since leaving Lopez's office.

68. For example, while working for Lopez, Burhans focused on policy and legislative work, which was consistent with her professional background. Burhans participated in numerous strategy meetings and discussions about Lopez's legislative priorities. She also helped drafted legislation and had substantial managerial and supervisory responsibilities in Lopez's district office. In contrast, Burhans has relatively few responsibilities in her current position on the staff of another Member of the Assembly. In her current role, Burhans spends most of her work time preparing newsletters. Burhans does not perform any policy or legislative work and she does not have any managerial or supervisory responsibilities.

Relevant Investigations and Findings

69. Contrary to the process followed when Complainant 1 and Complainant 2 filed complaints of sexual harassment, plaintiffs' complaints were promptly referred to the Ethics Committee for investigation. However, based on the extensive knowledge that Silver and his senior had previously acquired concerning Lopez's behavior toward the women on Lopez's staff, Silver and his senior staff knew or should have known that plaintiffs were being sexually harassed long before plaintiffs' made formal complaints to the Assembly's counsel.

70. Following an investigation, on August 24, 2012, the Ethics Committee unanimously concluded that Lopez violated the Assembly's sexual harassment policy in his treatment of plaintiffs.

71. The Ethics Committee made the following findings, among others:

- "That [plaintiffs'] allegations of unwelcome verbal and physical conduct of a sexual nature were credible"
- "That there was pervasive unwelcome verbal conduct by Assemblymember Vito Lopez toward both [plaintiffs] from early June 2012 until the time they made complaints of sexual harassment in mid- July 2012, including repeated comments about their physical appearance, their bodies, their attire, and their private relationships;"
- "That [plaintiffs'] perception that such conduct created an intimidating, hostile and offensive working environment was reasonable."

72. The Ethics Committee recommended a series of sanctions that Silver should take against Lopez, including removing him from his position as chair of the Assembly's Standing Committee on Housing and forfeiting all of the seniority rights and privileges he enjoyed in the Assembly. On August 24, 2012, Silver adopted the recommendations and publicly announced the findings of the Ethics Committee and the sanctions imposed on Lopez. However, at that time, despite knowing that Lopez had sexually harassed at least five women,

Silver did not attempt to expel Lopez from the Assembly or to commence a formal process pursuant to which the Assembly could vote on Lopez's expulsion.

73. Before the sanctions against Lopez were publicly released on August 24, 2012, Collins called the attorney for Complainant 1 and Complainant 2 to tell them that there might be media reports related to Lopez and to remind Complainant 1 and Complainant 2 about their confidentiality obligations under the parties' settlement. On information and belief, Collins made this call at Silver's direction and/or with his approval.

74. On information and belief, the Assembly sought to keep the settlement of the initial complainants private because, among other reasons, Silver and his staff knew that if the settlement became public, it would be apparent that the Assembly had not taken reasonable care to protect the women on Lopez's staff from being sexually harassed and abused.

75. Despite Silver and his senior staff's attempts to continue to hide the truth about the initial sexual harassment complainants against Lopez, on August 25, 2012, *The New York Times* published information about the settlement that the Assembly and Lopez reached with Complainant 1 and Complainant 2. See Danny Hakim and Thomas Kaplan, *Before Censure, a Hushed Settlement Against Assemblyman*, N.Y. Times, Aug. 26, 2012, at A1.

76. After the initial settlement became public, Silver and his spokesperson publicly stated, in substance, that the only reason that the sexual harassment complaints made by Complainant 1 and Complainant 2 were not referred to the Ethics Committee was that the victims did not want such an investigation conducted. These statements were false. Neither the initial complainants nor their counsel ever requested that the Assembly not investigate their complaints. To the contrary, counsel for Complainant 1 and Complainant 2 requested that the Assembly investigate Lopez, but the Assembly failed to do so.

77. On information and belief, Silver and his senior staff orchestrated a campaign of false public statements in order to deflect their egregious failure to have taken even the most basic steps to protect Lopez's staffers from Lopez's sexual harassment and abuse.

78. Shortly after the Assembly's sanctions against Lopez were publicly announced, despite the efforts of Burhans and Rivera to maintain their privacy and anonymity, media reports identified Burhans and Rivera as sexual harassment complainants against Lopez. As a consequence of being publicly identified in this manner, on information and belief, plaintiffs have suffered damage to their reputation and career prospects.

79. Shortly after the Assembly's sanctions against Lopez were publicly announced, the New York State Joint Commission on Public Ethics ("JCOPE") began an investigation into Lopez related to his conduct towards plaintiffs and other women in his Assembly office. JCOPE sought to determine whether Lopez had violated one or more provisions of the New York State Public Officers Law.

80. On or about February 12, 2013, the Commissioners of JCOPE, following an extensive investigation by JCOPE's staff, unanimously found that there was a substantial basis to conclude that Lopez's conduct towards plaintiffs and other women on his Assembly staff constituted multiple violations of the New York State Public Officers Law. These conclusions were set forth in a lengthy "Substantial Basis Report" that contained numerous factual findings related to Lopez's conduct and the Assembly's handling of the sexual harassment complaints against Lopez.

81. Among the findings made by JCOPE at the conclusion of its investigation were the following:

- [S]ince at least 2010, Lopez engaged in an escalating course of conduct with respect to multiple female staff members, including the complainants, that

began with demeaning comments about appearance and dress as well as demands for fawning text and email messages, increased to requirements for companionship outside the office, and culminated in attempted and forced intimate contact.

- The investigation found that Lopez rewarded female employees who tolerated his behavior or acceded to his demands with cash gifts, promotions, salary increases, and plum assignments.
- When female employees resisted or were not sufficiently demonstrative in their praise of Lopez or receptive to his overtures, he punished them with removal from important assignments, public berating, and threats of demotion or job termination.
- The investigation also revealed that errors were made in the management and disposition of the complaints against Lopez. The first two complaints against Lopez in December 2011 and January 2012, were not referred promptly to the Assembly Ethics Committee for an investigation.
- In addition, prior to entering into the Settlement Agreement [with Complainant 1 and Complainant 2], there was no investigation into the allegations, nor were there any other measures taken to protect Lopez's remaining female staff.
- Finally, the Settlement Agreement [with Complainant 1 and Complainant 2] contained a confidentiality clause that shielded from public disclosure not just Lopez's conduct, but even the fact that Lopez and the Assembly had settled a dispute relating to Lopez's conduct.
- Based upon the evidence developed through the investigation, the Commission finds that Lopez used the powers and perks of his position as a member of the Assembly to engage in knowing, willful, and prolonged mistreatment of certain female members of his Assembly staff.

82. The JCOPE report was publicly released on May 15, 2013. After the JCOPE report was issued, Silver belatedly announced his support for Lopez's expulsion from the Assembly and announced an Assembly vote on commencing a process that could lead to Lopez's expulsion. In advance of this vote, Lopez resigned his Assembly office effective May 20, 2013.

83. Following the issuance of the JCOPE report, Silver has made public statements acknowledging his "glaring" failure in not referring the original sexual harassment

complaints about Lopez to Ethics Committee for investigation. Silver publicly claimed that he “deeply regrets not referring the original complaint to the [Ethics Committee], and for this [he is] sorry.”

84. Silver has also publicly stated that the “degradation and emotional duress endured by the young women who were harassed while they served in the Assembly, weighs heavily on me.”

FIRST CAUSE OF ACTION

Sex Discrimination and Sexual Harassment Under NYSHRL

85. Plaintiffs repeat and reallege paragraphs 1-84 as if fully set forth herein. By the acts and practices described above, defendant discriminated against plaintiffs in the terms and conditions of their employment on the basis of their sex, including by creating a hostile work environment because of their sex, in violation of NYSHRL.

86. Defendant is liable for the discriminatory and harassing actions perpetrated by Lopez because, among other reasons: i) Silver and his senior staff acquiesced in and condoned Lopez’s creation of a sexually hostile work environment for members of Lopez’s staff; ii) Lopez was plaintiffs’ supervisor and used the power granted to him by the Assembly and the State to sexually harass plaintiffs and cause them to suffer tangible and adverse employment actions; and/or iii) due to Lopez’s high position in the Assembly, his actions are automatically attributable to the Assembly and the State.

87. Plaintiffs are now suffering and will continue to suffer irreparable injury and monetary damages and damages for mental anguish, emotional distress, and humiliation as a result of defendant’s discriminatory acts.

PRAYER FOR RELIEF

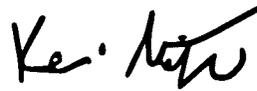
WHEREFORE, plaintiff respectfully requests that this Court enter an award:

- (a) declaring the acts and practices complained of herein in violation of the NYSHRL;
- (b) directing defendant to make plaintiffs whole for all earnings they would have received but for defendant's discriminatory treatment;
- (c) awarding plaintiffs compensatory damages for their emotional distress and humiliation;
- (d) awarding plaintiffs pre-judgment and post-judgment interest, as well as reasonable attorney's fees and the costs of this action; and
- (e) awarding such other and further relief as the Court deems necessary and proper.

Dated: New York, New York
March 27, 2014

THE LAW OFFICE OF
KEVIN MINTZER, P.C.

By: _____



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ASSEMBLY SEXUAL HARASSMENT/RETALIATION POLICY**I. Sexual Harassment**

Sexual harassment in the workplace is not only an offensive working condition, it is against the law. The New York State Human Rights Law (Executive Law sec. 290 et seq.) prohibits discrimination in employment on the basis of age, race, creed, color, national origin, sex, disability or marital status. Sexual harassment is also recognized as an unlawful employment practice under Title VII of the Civil Rights Act of 1964, imposing legal responsibilities upon every Assembly employee as well as the Assembly itself as employer.

Sexual harassment in the workplace is a condition which is not only obnoxious to its victims, but costly to the employer in its impact on employee productivity and morale. For purposes of this policy, the Assembly "workplace" or "employment environment", in accordance with existing law, may include off-premises business meetings, work-related attendance at receptions, working meals, work-related travel, and any other work-related events. Every Assembly employee is entitled to an employment environment free from sexual harassment, and all Assembly Members and employees are hereby advised that sexual harassment will not be tolerated within the Assembly workplace. Disciplinary sanctions will be enforced against any Assembly employee who is found to have engaged in prohibited conduct, as defined herein, and against any supervisor who knowingly permits such conduct by employees under his or her supervision. The Assembly shall conduct awareness training for all Members and employees. Unit heads and supervisory employees shall take affirmative steps to insure that all employees are informed of the Assembly policy on sexual harassment, to assist employees who complain of prohibited conduct, and to maintain in each office a working environment free from sexual harassment.

II. Prohibited Conduct

Following the Federal Equal Employment Opportunity Commission guidelines, sexual harassment, for the purpose of this directive, is hereby defined as any unwelcome (a) sexual advances, (b) requests for sexual favors, and (c) other verbal or physical conduct of a sexual nature when:

- (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- (2) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual; or
- (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment shall include conduct as described above by any Member or employee, whether or not in a supervisory position over the victim. The conduct need not be a condition or requirement for continued employment, promotion or other tangible employee benefit; sexual harassment shall include conduct which interferes with an individual's job performance by creating an offensive working environment.

III. Retaliation

No Assembly employee shall be subject to any form of retaliation because they report, complain of, or provide information, assistance and/or testimony related to any complaint of sexual harassment.

IV. Grievance Procedure

Any Assembly employee who feels that they may have been subjected to sexual harassment should feel free to address the situation with the person directly, but need not feel compelled to do so. If an employee chooses such method of dealing with such circumstances, and the offending behavior does not cease, the employee should pursue the grievance procedure set forth in this policy.

A. Complaints

Complaints of sexual harassment or retaliation, other than complaints subject to the provisions of Article V of this Policy, may be directed to the appropriate unit head or in writing to the Office of Counsel to the Majority, Room 448M Capitol, ext. 4191. Complainants are strongly encouraged to consult initially with their respective unit heads to attempt informal resolution, but failure to do so will in no way limit the right to utilize the Assembly grievance procedure initially or thereafter if resolution cannot be accomplished through the unit head. There shall also be Intake Representatives, made up of Majority and Minority members and staff, to whom complaints of sexual harassment can be made. A list of all Intake Representatives is maintained by the Office of Counsel to the Majority and the Office of Human Resources. Complainants may direct their complaints to any Intake Representative. Intake Representatives will assist a complainant in commencing the grievance procedure under the Assembly's policy. Intake Representatives will not participate in the formal investigation undertaken by the Office of Counsel to the Majority or any designated outside party. Interns are subject to and covered by this policy. Given the relative short duration of their employment, the Assembly encourages interns to contact Counsel's Office or any Intake Representative regarding a complaint as promptly as possible. Complaints shall be made within one year after occurrence of the alleged prohibited conduct or retaliation. Written complaints shall be maintained by the Office of Counsel to the Majority for seven (7) years.

All complaints of sexual harassment or retaliation, and information and proceedings relating thereto, shall be kept in strict confidence except as otherwise specified herein.

B. Investigation

Upon receipt of a written complaint the Counsel shall, in a timely manner, conduct an investigation of the complaint, interviewing appropriate persons, examining relevant records, and consulting with and utilizing any appropriate Assembly staff. At the recommendation of the Intake Representatives and Counsel's Office, in consultation with the complaining party, and when extraordinary circumstances warrant, an outside party shall be retained to conduct the investigation of a complaint interposed under this policy. In the event that the alleged offender might have an official role in the grievance procedure or supervision/oversight of persons involved in such process, he/she shall not perform that role or exercise any such authority in relation to such complaint.

Neither the complaining individual nor the alleged offender will be entitled to participate in the determination of whether a violation of this policy has occurred other than as witnesses.

If the Counsel deems it appropriate, the parties to the complaint may, if both parties agree, be brought together to attempt an informal resolution of the complaint in a manner satisfactory to both parties.

Both the complainant and the person against whom the complaint is made shall be permitted to have their private counsel present at an interview or any other proceeding at which their presence is required.

C. Counsel's Findings

Upon conclusion of the investigation, and within 90 days after the complaint was brought, the Counsel shall make written findings which shall consist of the following:

1. A finding that no prohibited conduct or retaliation has occurred; or
2. A finding that prohibited conduct or retaliation has occurred and a report to the offending party's immediate supervisor including a recommended remedy. This remedy which may be oral censure of the offender; written censure of the offender, to be included in the offender's personnel file; and/or, transfer, suspension, or discharge of the offender, or any other action which may be appropriate under the circumstances.

Copies of the Counsel's written finding shall be mailed to the complainant and the party against whom the complaint was made.

D. Hearing

Upon a finding by Counsel that no prohibited conduct has occurred and a written request by the complainant for a hearing, the Director of Human Resources shall conduct a formal hearing. Upon a finding by Counsel that prohibited conduct has occurred and a written request by the offender, a formal hearing shall be conducted by the Director of Human Resources only with regard to the recommended remedy. Such formal hearing shall provide a fair opportunity for parties and witnesses to be heard. At the conclusion of such hearing, the Director shall issue a written determination.

E. Record

The record maintained with respect to each complaint and investigation of sexual harassment and/or retaliation shall contain: the written complaint; any written statements produced during the investigation; the recommendation of the Counsel. Such record shall be available to either party or the designee thereof.

V. Members of the Assembly

A complaint of sexual harassment and/or retaliation against a Member of the Assembly shall be referred to the Assembly Standing Committee on Ethics and Guidance for investigation. The Committee shall conduct its investigation in the same manner as described above with respect to investigations conducted by counsel. Upon conclusion of the investigation, the Committee shall report its findings to the Speaker and, as appropriate, the Minority Leader, accompanied by a recommended remedy, or dispose of the matter in accordance with its policy regarding disciplinary matters.

VI. Appeals

If any party is not satisfied with the outcome of the grievance procedure, appeal may be taken directly to the Speaker of the Assembly or his designated representative, who may be an outside hearing officer retained on an ad hoc basis.

State and federal law also provide administrative and judicial remedies for employees which may be pursued by filing a complaint with the Albany Regional Office of the New York State Division of Human Rights or with the Federal Equal Employment Opportunity Commission. It is recommended, but not legally required, that the complainant first use the grievance procedure within the Assembly as established herein.

VII. Training

The Assembly shall conduct a sexual harassment awareness training program and every Member and employee shall receive such training. Such program shall be conducted so as to ensure that every Member and employee understands the seriousness of the problem of sexual harassment, how to recognize and address it, rights and responsibilities under the law and the Assembly Policy, and how to bring a complaint. Failure to attend such training program or re-scheduled sessions thereof shall subject a Member or employee to appropriate sanctions so as to compel and insure attendance and participation in such training by all Members and employees. Training shall be conducted separately for Members, supervisory and non-supervisory employees, and interns, with emphasis on the respective rights and responsibilities of each group.

VIII. Dissemination

A copy of this Policy shall be included in the Employee Information Guide, shall be distributed at least once annually, and shall be otherwise disseminated as the Speaker may direct.



SHELDON SILVER, SPEAKER

Issued August 16, 1984
Reissued March 2011