

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

ROCHELLE D. COLLINS and
OREESE COLLINS, JR.,

Plaintiffs,

v.

COLLINS, ROCHELLE D , et al. v DE
Hon. Susan D. Borman 06/15/2011



11-007059-CZ

CITY OF DETROIT, A Michigan Municipal
Corporation, MAYOR DAVE BING, Individually,
and KAREN DUMAS, Individually,

Defendants.

COURTNEY E. MORGAN, JR. (P29137)

DEBRA N. POSPIECH (P55277)

Morgan & Meyers, PLC

Attorneys for Plaintiffs

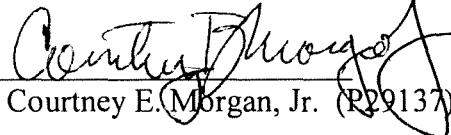
3200 Greenfield, Suite 260

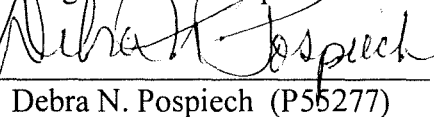
Dearborn, MI 48120

(313) 961-0130

COMPLAINT AND JURY DEMAND

There is no other pending or resolved civil action arising out
of the transaction or occurrence alleged in the Complaint.


Courtney E. Morgan, Jr. (P29137)


Debra N. Pospiech (P55277)

Plaintiffs, ROCHELLE D. COLLINS and OREESE COLLINS, JR., by and through their
attorneys, MORGAN & MEYERS, PLC, complain of Defendants for the following reasons:

(General Allegations)

1. Plaintiff Rochelle D. Collins ("Plaintiff") is a Wayne County, Michigan resident, and a former Executive Assistant to the Mayor for the City of Detroit. Plaintiff Oreese Collins, Jr. ("Plaintiff Oreese Collins") is a Wayne County, Michigan resident and husband of Rochelle D. Collins.

2. Defendant City of Detroit is a municipal corporation organized and existing under the laws of the State of Michigan, and located in Wayne County, Michigan.

3. Defendant Mayor Dave Bing ("Defendant Bing") is a Wayne County, Michigan resident and is Mayor and an agent of the City of Detroit. Defendant Karen Dumas ("Defendant Dumas") is a Wayne County, Michigan resident and currently holds the title of Chief Communications Officer for Mayor Dave Bing and the City of Detroit and is an agent of the City of Detroit.

4. All the events in controversy occurred in Wayne County, Michigan; and the amount in controversy exceeds \$25,000.00, exclusive of interest, costs and attorney fees.

5. Plaintiff Collins has been employed with the City of Detroit for 21 years, serving in various capacities including an Administrative Assistant, Senior Development Specialist, and Associate Development Specialist. Plaintiff Collins holds a Bachelor's of Science Degree from the University of Michigan in Business Administration, and a Master's Degree in Management/Marketing from University of Phoenix.

6. In June 2009 Plaintiff accepted a position as Executive Assistant to the Mayor II, and at times pertinent hereto held an external title of Governmental Affairs Liaison with a direct reporting relationship to the Group Executive for Corporate and Civic Affairs for the City of

Detroit (hereinafter “Group Executive”). During her tenure in the Mayor’s Office, Plaintiff achieved numerous important accomplishments, including:

- a. Developed the request for proposal, scope of service and rating criteria for the City’s federal lobbyist contract;
- b. Successfully developed the job description for the Education Advocate for the City of Detroit, which resulted in the award of a \$125,000 grant from the Skillman Foundation for the position;
- c. Developed and maintained ongoing relationships with Federal government agencies;
- d. Successfully developed and implemented in conjunction with the United States Department of Defense the first “Match Making” event in the City of Detroit;
- e. Successfully coordinated the only visit of the First Lady of the United States to the City of Detroit, which required Plaintiff to interface with the Department of Justice, Office of the First Lady, Office of the President, Secret Service, FBI, State Police and Wayne State University;
- f. Developed policy and procedures for the submission of federally funded grants on behalf of the City;
- g. Represented the City of Detroit on the repositioning of the Lead Program with the Center for Disease Control, allowing the City of Detroit to maintain its current funding;
- h. Managed and assisted with the implementation of the Mayor’s Residence Board;

i. With the full knowledge and authorization of Defendant Mayor Bing, Plaintiff participated in the strategy developed by the Governor and his Executive Staff, the Emergency Financial Manager of Detroit Public Schools (DPS), Defendant Mayor Bing, and the Group Executive to transfer control of DPS to the Mayor of Detroit; including, but not limited to, performing the following duties:

- (i) Worked with a consultant paid for by the Bing Institute to conduct polling of Detroit citizens whether they support Mayoral control over DPS, the results of which showed overwhelming support for the idea;
- (ii) Scheduled clandestine meetings between Defendant Mayor Bing, the Group Executive, the Governor and/or his Executive Staff, and/or the DPS' Emergency Financial Manager to develop and execute the strategy;
- (iii) Worked with stakeholders to ensure that Public Act 4 contained all necessary provisions to accomplish the goals of the strategy, which included Defendant Mayor Bing being named Emergency Manager for the City of Detroit *and* DPS, and dissolving both the Detroit City Council and the DPS School Board;
- (iv) Participated in meetings with the Group Executive, the U.S. Department of Education, the Deputy Superintendent for DPS, and/or the Chief Communications Officer for DPS to develop and execute the strategy; and

- (v) Handled every detail of the Group Executive's transition to become the new Emergency Manager for DPS, and worked closely with the Governor's Administration and the existing Emergency Manager to finalize details of the transition and to ensure all paperwork was in order.

7. Since all the details of the strategy were complete, during the week of February 14, 2011, Defendant Mayor Bing announced to his Executive Staff that the Group Executive would be leaving the Bing Administration to become the new Emergency Financial Manager for DPS. Defendant Dumas was present in this meeting; and upon information and belief, this is when she first learned of the strategy.

8. On or about February 28, 2011, Defendant Dumas told Defendant Mayor Bing that it "would kill him politically" if the Group Executive became the Emergency Manager for DPS, despite the fact that:

- a. Polling had shown overwhelming support for the idea of Mayoral control over DPS;
- b. 30,000 plus petition signatures were delivered to City Hall in support of Mayoral control over DPS;
- c. This strategy would have been in the best interests of the children of Detroit and the City as a whole;
- d. This strategy was advocated by both the federal and state Administrations, and would have meant an infusion to DPS of a billion dollars of aid and nationally renowned expertise to mirror the new DPS after the highly successful Chicago Public School System.

9. Defendant Dumas' advice to Defendant Mayor Bing caused a rift between Defendant Mayor Bing and the Group Executive. Plaintiff spoke privately with Defendant Mayor Bing and expressed her concern that abandoning this strategy would cause a breakdown in the personal and professional relationship he had the Group Executive. Defendant Mayor Bing stated he had spoken at great length with the Group Executive and was following the advice of Defendant Dumas that the strategy not be executed.

10. On or about March 4, 2011, Defendant Mayor Bing met with the Group Executive in the morning on two occasions having what appeared to be heated discussions. That afternoon, the Group Executive was "relieved of his duties." Statements were made to the media and others that Defendant Mayor Bing had to terminate the Group Executive because the Group Executive sought to be named the new Emergency Manager for DPS *without* Defendant Mayor Bing's knowledge or support, in order to deflect from Defendant Mayor Bing's *actual knowledge of and participation in the strategy*.

11. Throughout Plaintiff's tenure as Government Affairs Liaison, Defendant Dumas attempted to exert control over governmental affairs and public policy matters, areas of discipline for which Defendant Dumas was not qualified, experienced nor knowledgeable. Plaintiff developed solid, professional relationships with the City's state lobbying firm, the City's federal lobbying firm, and various members of President Obama's Administration, and Plaintiff was respected for her knowledge of the issues, her professionalism, and her demeanor. Plaintiff cultivated those relationships for the benefit of the City of Detroit and Defendant Mayor Bing.

12. After Defendant Mayor Bing relieved the Group Executive of his duties, and because Plaintiff had intimate knowledge of the true facts and circumstances regarding the reason for the Group Executive's departure, as opposed to statements Defendants made to the

media and others about his departure, they assigned Plaintiff's direct reporting relationship to Defendant Dumas. Defendant Dumas proceeded to "micro-manage" Plaintiff's work responsibilities to a level that was harassing. Defendant Dumas also ordered Plaintiff to move to a smaller office under the pretense that Defendant Dumas needed Plaintiff to be closer to her. Requiring Plaintiff to directly report to Defendant Dumas and moving Plaintiff to an office closer to her was intended to intimidate Plaintiff and to place her under an unnecessarily heightened level of scrutiny, thereby causing or contributing to the creation of a hostile work environment in violation of Executive Order 2010-1.

13. Defendant Dumas' attempts to intercede on governmental affairs and public policy matters were detrimental to the City of Detroit at the local, state and federal level; and Plaintiff believed it was in the best interest of the City of Detroit and Defendant Mayor Bing to question Defendant Dumas' directives and advice on such matters. Defendant Dumas created a demeaning, hostile work environment because Plaintiff questioned Defendant Dumas' judgment and because Plaintiff showed initiative in submitting recommendations to Defendant Mayor Bing. Defendant Dumas did not welcome or appreciate Plaintiff's experience and knowledge regarding governmental affairs and public policy matters even though Plaintiff had performed admirably under the direction of the former Group Executive for Corporate and Civic Affairs.

14. On or about March 26, 2011, an anonymous letter was delivered to Defendant Mayor Bing, and also delivered to members of the Detroit City Council, setting out numerous, serious concerns about Defendant Dumas' behavior, both ethically and legally, critical of her professionalism and her perceived vendettas toward other members of the Bing Administration, questioned whether there is an intimate relationship between Defendant Mayor Bing and Defendant Dumas, questioned whether Defendant Mayor Bing and Defendant Dumas were using

public funds for private use, cited Defendant Dumas' alleged violation of the Freedom of Information Act and retaliation against an employee who complied with a FOIA request, and stated Defendant Mayor Bing and Defendant Dumas have created a hostile work environment for employees. The letter questioned Defendant Mayor Bing's judgment in retaining Defendant Dumas on his staff and challenged him to do what would be in the best interest of the citizens of Detroit. The letter is attached and hereby incorporated as Exhibit 1.

15. Upon information and belief, Defendant Mayor Bing turned the March 26, 2011, anonymous letter over to the City's Corporation Counsel. Upon information and belief, Defendant Dumas told Defendant Mayor Bing that Plaintiff authored the March 26, 2011, letter. Plaintiff did not. Defendant Mayor Bing and Defendant Dumas' belief that Plaintiff authored the anonymous letter further fueled the hostile work environment against her.

16. The difficulties of Defendant Dumas' hostile attitude toward Plaintiff continued to escalate to the point where Defendant Mayor Bing requested a meeting between himself and Plaintiff on or about March 31, 2011.

17. At an 11:00 a.m. meeting on or about March 31, 2011, Plaintiff advised Defendant Mayor Bing that it was difficult working with Defendant Dumas and her micro-managing of Plaintiff's job responsibilities because Defendant Dumas had limited knowledge of the political process with the state and federal government. Defendant Mayor Bing acknowledged that although it appeared Defendant Dumas was attempting to micro-manage Plaintiff, he believed Defendant Dumas was simply "feeling uneasy and insecure" about government affairs because she was unfamiliar with the political process.

18. At the 11:00 a.m. meeting on or about March 31, 2011, Plaintiff also informed Defendant Mayor Bing that Defendant Dumas had made defamatory remarks about Plaintiff that

matters were "fucked up" and that Plaintiff was incompetent. Further, Defendant Dumas instructed Plaintiff to eat lunch with her every day to provide details of every conversation Plaintiff had with any person regarding City business whether by telephone or in person. Defendant Mayor Bing stated that Defendant Dumas should let Plaintiff "do her damn job" and concentrate on her own responsibilities; and told Plaintiff to so state this to Defendant Dumas.

19. At the 11:00 a.m. meeting on or about March 31, 2011, Defendant Mayor Bing asked that Plaintiff meet with him, the Chief of Staff and Defendant Dumas later that day to discuss the situation further. Plaintiff agreed and stated she would make every effort to work with Defendant Dumas. Defendant Mayor Bing indicated his staff was "thin" and he thought Plaintiff brought value to the team and he did not want to lose Plaintiff as a member of his Administration; and that everyone was overworked and stretched. A meeting was set for 3:00 p.m.

20. At the 3:00 p.m. meeting on or about March 31, 2011, Defendant Mayor Bing stated it had been brought to his attention there was tension between Plaintiff and Defendant Dumas and that he did not want to lose either employee and wanted to work out the situation as quickly as possible. At that time, Defendant Mayor Bing informed Plaintiff that Defendant Dumas had been complaining Plaintiff was not answering emails, Plaintiff refused to speak to Defendant Dumas, and that Plaintiff did not want to report to the Communications Manager. Plaintiff responded that these statements were not true and that Defendant Dumas had told Plaintiff that Defendant Mayor Bing did not think the Communications Manager was supervisory material, so Plaintiff's assignment as a direct report to Defendant Dumas was intended to put Plaintiff as second in command.

21. At the 3:00 p.m. meeting on or about March 31, 2011, Plaintiff again told the Defendant Mayor Bing that Defendant Dumas was not familiar with the responsibilities of Government Affairs Liaison, and that the proper performance of the job duties were not driven by communication; rather, communication is driven by good policy decisions related to governmental affairs. Defendant Dumas became visibly upset and repeated her false statement that Plaintiff was not responding to emails as instructed. Plaintiff then advised Defendant Mayor Bing that her emails contained a feature that notified Plaintiff when Defendant Dumas opened the email and that all correspondence Plaintiff sent to Defendant Dumas had been received and opened. Knowing full well that she had been caught lying to Defendant Mayor Bing, Defendant Dumas became further enraged and stated she receives more than 1,000 emails a day and perhaps she opened the emails but did not realize they were from Plaintiff.

22. At the 3:00 p.m. meeting on or about March 31, 2011, Defendant Dumas further questioned Plaintiff's capability to perform her job duties. At that time, Defendant Mayor Bing stated he felt Plaintiff was more than capable of doing the job and had been performing well under the former Group Executive for Corporate and Civic Affairs. Defendant Mayor Bing then asked if Defendant Dumas and Plaintiff would be willing to meet separately with the Chief of Staff, who was present during the 3:00 p.m. meeting. Plaintiff agreed. Defendant Dumas refused to answer.

23. At the 3:00 p.m. meeting on or about March 31, 2011, Defendant Dumas also told Defendant Mayor Bing that she did not trust Plaintiff and stated the impending trip to Washington D.C. the following week would be difficult due to the strain in the relationship. Plaintiff indicated that she was a professional, the matter would not interfere with her ability to

represent the Administration, and that the controversy would not be something discussed outside the office.

24. Defendant Dumas then raised her voice to Defendant Mayor Bing that she was "done" with the meeting because it was "bullshit" and she did not want to talk about it anymore. Defendant Dumas then stormed out of the Mayor's office ranting, "This is bullshit!" in the outer office, causing a scene witnessed by several employees. Defendant Mayor Bing took no action or corrective action regarding Defendant Dumas' behavior. Plaintiff assured Mayor Defendant Bing that she would continue to represent the Administration in a professional manner and he did not have to worry about the upcoming trip.

25. When Plaintiff returned to her office after the 3:00 p.m. meeting on or about March 31, 2011, Defendant Dumas came into Plaintiff's office, shut the door and demanded to speak to Plaintiff. Given Defendant Dumas' previous ranting and unprofessional behavior at the earlier meeting, Plaintiff stated she did not want to talk further. Defendant Dumas then proceeded to yell at Plaintiff, "How dare you tell the Mayor what I said about [the Communications Manager]! I would never tell someone something you told me!"

26. Plaintiff stated for a third time that she did not want to discuss the issue anymore and attempted to leave her office. Defendant Dumas physically stood in front of the door so that Plaintiff could not leave. Plaintiff asked Defendant Dumas to leave her office, but Defendant Dumas continued to shout at Plaintiff that she did not trust her, and that Plaintiff's comment about the Communications Manager would cause Defendant Mayor Bing not to trust Defendant Dumas. Defendant Dumas also stated that Plaintiff made Defendant Dumas "look like an idiot" in front of Defendant Mayor Bing and "that stupid bitch," referring to the Chief of Staff. Plaintiff became visibly emotional and upset and continued to ask Defendant Dumas to leave her

office. Defendant Dumas continuously refused to leave and shouted she did not want to resolve the matter with the participation of the Chief of Staff because she felt the Chief of Staff was "incompetent and stupid."

27. Mayoral Executive Order No. 2010-1 issued by Defendant Mayor Dave Bing on November 15, 2010, entitled "Violence in the Workplace" states in pertinent part:

"Employees have the right to work in an environment that is free from violence. As an employer, the City of Detroit will take all affirmative steps necessary to eliminate violence in the City workplace.

Violence in the workplace includes: 1) written or verbal communications, whether direct or indirect, which are of a threatening, intimidating, or coercive nature; 2) the use or threat of physical force, including fighting or horseplay. . . . Appropriate disciplinary action, up to and including discharge, will be taken against employees who are found to have engaged in such misconduct.

The City of Detroit will not tolerate violence in the workplace, whether committed by or against City employees. In accordance with this Order:

- 1.) The City of Detroit shall continue to adhere to a policy of zero tolerance for any form of violence in the workplace;
- 2.) The Director of the Human Rights Department shall promulgate and oversee the implementation of a Violence in the Workplace Policy. This Policy shall provide for designation of a City of Detroit Violence in the Workplace Coordinator within the Human Rights Department, appointment of a departmental Violence in the Workplace Liaison in each City department and agency, report and investigation procedures for incidents of workplace violence, appropriate assistance to victims of workplace violence, and training of City of Detroit managers, supervisors, and employees on the Violence in the Workplace Policy;
...
- 5) All managers and supervisors shall be responsible for implementing and maintaining safe workplace practices, the City of Detroit Violence in the Workplace Policy, and communicating the Policy to subordinates;
...
- 7) All employees, including managers and supervisors, shall be responsible for reporting incidents of violence in the workplace or any potentially dangerous situation to their supervisors, the

Violence in the Workplace Liaison in each department and agency, the Human Rights Department Workplace Violence Unit, or, where appropriate, to law enforcement authorities;

...

- 9) **No person shall be retaliated against for having made a good faith report or complaint or for participating in, or aiding an investigation of, an incident or threat of violence in the workplace.**

(Exhibit 2)

28. In the days after Defendant Dumas' physically aggressive and psychologically demeaning behavior in Plaintiff's office, Defendant Dumas continued her hostile behavior toward Plaintiff by asking for information/materials that Plaintiff had previously sent, again stating she was not receiving them, and instructing staff not to speak to Plaintiff with the threat of dismissal if they did so. Defendant Dumas told Plaintiff that she could no longer correspond directly with Defendant Mayor Bing, and all correspondence had to come through Defendant Dumas or the Communications Manager. When Plaintiff asked Defendant Dumas the reason for this change, Defendant Dumas responded, "Because I said so."

29. On April 3-5, 2011, Defendant Mayor Bing, Defendant Dumas and Plaintiff traveled to Washington, D.C. for a series of meetings on important government affairs and public policy matters. Plaintiff arranged the meetings for the trip and submitted suggested subjects of discussion to Defendant Mayor Bing. Although Defendant Dumas was the Chief Communications Officer and was not qualified, experienced or knowledgeable about governmental affairs and public policy matters affecting Detroit at the federal level, Defendant Dumas indicated that she, *not the Mayor*, would decide what he would discuss during the meetings. Defendant Dumas ordered Plaintiff not to submit anything to Defendant Mayor Bing. Defendant Dumas also stated that she and Plaintiff needed "to work this shit out" between them, and that perhaps Plaintiff would have to report to someone else.

30. During the Washington D.C. trip Defendant Mayor Bing asked Plaintiff about the relationship between Defendant Dumas and herself, at which time Plaintiff informed Defendant Mayor Bing that they were attempting to work things out. Defendant Mayor Bing stated he was glad to hear that because he did not want to lose Plaintiff or Defendant Dumas as an employee.

31. There was no legitimate business reason for Defendant Dumas to travel with Defendant Mayor Bing on the trip to Washington D.C. While Defendant Mayor Bing, Defendant Dumas, Plaintiff, and a member of the Mayor's Executive Protection Unit (E.P.U.) traveled in the Washington D.C. area, Defendant Dumas requested the driver of their vehicle to stop at T. J. Maxx so she could go shopping. Defendant Dumas made Defendant Mayor Bing, Plaintiff and the E.P.U. officer wait in the vehicle for her while she went shopping. Defendant Mayor Bing did not object to or correct Defendant Dumas' behavior. Later that afternoon, after the group attended a few meetings, Defendant Dumas requested the driver to take her to the Burberry store. Plaintiff stated that Defendant Mayor Bing had a meeting with one of Michigan's United States Senators and they would be late for the meeting if they stopped for another shopping trip. Defendant Dumas stated that Defendant Mayor Bing did not need to meet with the United States Senator, told Plaintiff to cancel the meeting, and had the driver take the group to the Burberry store where, again, the group waited in the vehicle while Defendant Dumas went shopping. Defendant Mayor Bing did not object to or correct Defendant Dumas' behavior. Defendant Dumas' behavior was both unprofessional and a misuse of City of Detroit taxpayer funds. This incident further contributed to the hostile work environment for Plaintiff in that it was becoming clear to Plaintiff that Defendant Dumas had the full support of Defendant Mayor Bing no matter how poorly Defendant Dumas behaved.

32. Upon return from the Washington, D.C. trip Defendant Dumas continued to harass Plaintiff by asking her for the same information previously requested and stating she was not receiving Plaintiff's emails. Plaintiff advised Defendant Dumas that not only was she sending Defendant Dumas all information requested, that she was also copying the Communications Manager and placed hard copies of emails directly in Defendant Dumas' office. Defendant Dumas still claimed she was not receiving the documents.

33. Plaintiff met with the Chief of Staff on April 6, 2011, and reported, pursuant to Executive Order 2010-1 regarding Violence in the Workplace, Defendant Dumas' threatening, intimidating and coercive verbal communications, and Defendant Dumas' physical threat in blocking Plaintiff's doorway so she could not leave her office, all of which occurred on or about March 31, 2011; as well as reported Defendant Dumas' continued false allegations that Plaintiff was not responding to e-mails or communicating with Defendant Dumas. Plaintiff's action constituted protected activity under the Whistleblowers' Protection Act, MCL 15.361 *et seq* in that she reported a violation of a law or regulation or rule promulgated pursuant to a political subdivision of the State of Michigan.

34. The Chief of Staff was very concerned about the incident in Plaintiff's office, the aggressive nature of Defendant Dumas' actions, Plaintiff's emotional distress from the incident, and Defendant Dumas' refusal to leave. The Chief of Staff stated she would fully investigate the matter and that Plaintiff should keep the Chief of Staff informed of any continued or escalated hostile behavior by Defendant Dumas.

35. On April 8, 2011, pursuant to Executive Order 2010-1, the Chief of Staff held a mandatory staff meeting to discuss the Executive Order and workplace violence. Defendant Mayor Bing attended the meeting and stated workplace violence and/or intimidation against

employees would not be tolerated. He informed his staff that employees should discuss any issues/concerns with the Chief of Staff. During this meeting, the Chief of Staff provided details on what is considered workplace violence.

36. During this meeting the Chief of Staff advised employees that if someone is yelling at the employee and he or she is uncomfortable, the employee should inform the offending employee he or she is uncomfortable and state a desire not to discuss the matter any further. The Chief of Staff also informed the employees if the offending employee is persistent the employee should again inform the offending employee that he or she does not feel comfortable and/or he or she feels threatened and walk away.

37. During the meeting Defendant Dumas asked the Chief of Staff if she witnessed work place violence or harassment would she have to report it or testify against the Administration if she is an appointee. The Chief of Staff, who is a licensed attorney responded, "Yes, as an officer of the court, I would have to testify and/or investigate if it is brought to my attention." Defendant Dumas, then asked, "So if you witness something as an appointee you will have to report it?" and, again, the Chief of Staff stated, "Yes." Defendant Dumas became enraged and stormed out of the meeting before the Chief of Staff had finished her presentation for the employees. Defendant Mayor Bing did not react to or correct Defendant Dumas' behavior in front of the rest of the staff, indicating that her behavior was to be tolerated.

38. After the April 8, 2011, meeting Defendant Dumas confronted Plaintiff and stated in a hostile tone, "It's because of you we had this meeting," and marched away.

39. During the week of April 11, 2011, Defendant Dumas instructed Plaintiff to negotiate a contract between the City's current state lobbying firm and a second lobbying firm, whose general partner was a former State Legislator with whom Defendant Dumas had a

political relationship and to whom she wanted to steer business. Plaintiff informed Defendant Dumas that this was improper as Plaintiff would be negotiating a third party contract on behalf of a vendor, and further, there were no City funds available to pay for a second state lobbying firm. Defendant Dumas told Plaintiff that she (Defendant Dumas) was instructing the City's current lobbying firm to hire the second firm to "supervise" the City's current lobbying firm. Plaintiff informed Defendant Dumas that it would be improper for the City's lobbying firm to pay another firm to "supervise" their actions.

40. Defendant Dumas ignored Plaintiff's concerns and instructed Plaintiff to review the second lobbying firm's proposal and make recommendations to strengthen their proposal. Plaintiff informed Defendant Dumas that the second lobbying firm's proposal included a statement that they would assist the Mayor with his re-election campaign. Plaintiff informed Defendant Dumas this was illegal and the City would be prohibited from paying funds for this purpose. Defendant Dumas instructed Plaintiff to inform the second lobbying firm to remove this item from their proposal although she (Defendant Dumas) *would still require the second lobbying firm to perform the illegal act of assisting with the Mayor's re-election campaign using City funds.*

41. Plaintiff was extremely uncomfortable with these illegal directives from Defendant Dumas and requested that the two lobbying firms work out the terms of their third party contract directly. Defendant Dumas instructed Plaintiff not to involve the City's lobbying firm until there was a deal with the second lobbying firm. Defendant Dumas made it clear that she would be *telling* the City's lobbying firm that it had to enter into a contract with the second lobbying firm. Due to her concerns over the legality of the contract, Plaintiff purposely did not follow through with completion of the tasks assigned to her.

42. After Plaintiff engaged in protected activity under the Whistleblowers' Protection Act, Defendant Mayor Bing and Defendant Dumas consistently placed Plaintiff in situations that would essentially undermine Plaintiff's credibility and integrity, such as:

a. On April 26, 2011, Defendant Mayor Bing met with a principal from the City's lobbying firm and advised him that Plaintiff and Defendant Dumas did not get along and were having difficulties working together. Defendant Mayor Bing stated that although Defendant Dumas did not understand governmental affairs, staff changes were going to be made and Plaintiff would have some other role in the Administration. Defendant Mayor Bing's comments to the City's lobbyist were upsetting to Plaintiff because she had an excellent working relationship with the City's lobbyist and Defendant Mayor Bing's comments indicated Plaintiff was the one who had to be removed because of the difficulties with Defendant Dumas.

b. On numerous occasions, Defendant Mayor Bing and Defendant Dumas excluded Plaintiff from meetings with Defendant Mayor Bing, Executive Staff and/or the City's lobbyist to discuss the upcoming state budget hearings and/or strategy for proposed legislative amendments; yet, Defendant Dumas instructed Plaintiff to prepare a budget strategy for the upcoming state budget hearings and prioritize proposed legislative amendments for the City of Detroit. Plaintiff informed Defendant Dumas the request would be difficult due to the fact that Plaintiff had been excluded from all meetings and strategy sessions with the Governor, the State Treasurer, City Council, and the City's lobbyist. Defendant Dumas dismissed Plaintiff's concerns and said attendance at the meetings was not necessary to perform the tasks assigned to her, clearly exhibiting Defendant Dumas' lack of understanding of governmental affairs and public policy.

c. Defendant Dumas requested that Plaintiff meet with the Executive Staff to develop a state and federal strategy for the upcoming congressional session; but then informed Plaintiff that she, Defendant Dumas, not the Executive Staff would decide how to proceed because Defendant Dumas felt the Executive Staff was "too stupid to make any decisions." This placed Plaintiff in the position of meeting with Executive Staff under the false pretense of receiving their input on important state and federal legislative strategy, knowing full well that Defendant Dumas, a person who was not qualified, experienced or knowledgeable about legislative affairs, would be making the final decision. This scenario undermined Plaintiff's credibility with the Executive Staff.

d. When the Detroit Zoological Society called Plaintiff to request that the First Lady be nominated to their board, Plaintiff relayed the information to Defendant Dumas who stated that she, Defendant Dumas, would sit on the board and not the First Lady. When Plaintiff asked if Defendant Mayor Bing should make the decision as to who would sit on the board, Defendant Dumas told Plaintiff, "no" because Defendant Mayor Bing and the First Lady's relationship was "strange" requiring Defendant Dumas to make those types of decisions. This placed Plaintiff in the awkward position of having to advise the Zoological Board that their request to have the First Lady on their board would be denied. Defendant Dumas made other inappropriate comments of a personal nature regarding the status of Defendant Mayor Bing and the First Lady's marriage.

e. Defendant Dumas asked Plaintiff about the status of a letter appointing the City's nominee to the Detroit-Wayne Port Authority Board. Plaintiff advised Defendant Dumas that the letter appointing a specific individual, pursuant to the Mayor's request, was on his desk awaiting signature. Defendant Dumas disagreed with the appointment of

the specific individual and went to speak with Defendant Mayor Bing. Defendant Dumas then returned to Plaintiff's office and said she was a liar, and that Defendant Mayor Bing stated he had never asked Plaintiff to prepare a letter nominating that individual. Plaintiff responded that she would not have prepared the letter on her own without the Mayor's directive, at which point Defendant Dumas made a derogatory comment about Defendant Mayor Bing's ability to remember what he says. In a subsequent meeting between Defendant Mayor Bing, Defendant Dumas, and Plaintiff, Plaintiff asked Defendant Mayor Bing whether he instructed Plaintiff to write a letter nominating the specific person to the Detroit-Wayne Port Authority Board, and Defendant Mayor Bing stated he, indeed, so instructed Plaintiff. Defendant Dumas became enraged about the appointee and called the person an "asshole," stated she would not allow that person to be appointed, and demanded that her choice be the nominee—a person with whom she had a longstanding political relationship. Defendant Mayor Bing did not comment and did not correct Defendant Dumas' behavior in blocking *his choice* of a nominee to the Detroit-Wayne Port Authority Board.

41. Plaintiff has a preexisting health condition that is exacerbated by stress. During Plaintiff's tenure in the Mayor's Office, the emotional and physical stress of all of the above actions by Defendant Mayor Bing and Defendant Dumas caused Plaintiff to have increased monitoring of her condition, including heart monitoring, and to be hospitalized on four occasions. Plaintiff's physician placed her on medical leave on May 16, 2011.

43. On May 20, 2011, while Plaintiff was on medical leave, a member of the Mayor's Executive Protection Unit hand delivered to Plaintiff's residence a letter dated May 18, 2011,

informing her that at the close of business on May 20, 2011, her appointment as Executive Assistant to the Mayor II ended.

44. Upon information and belief, Defendant Dumas then instructed employees in the Information Technology Department to *delete* all e-mails on Plaintiff's computer.

COUNT I

VIOLATION OF WHISTLEBLOWERS' PROTECTION ACT

Plaintiffs hereby restate, reallege and incorporate by reference, each and every paragraph above, as though fully set forth herein, and further state the following:

45. Pursuant to the Whistleblowers' Protection Act, MCL 15.361 *et. seq.*, an employer may not discharge or otherwise discriminate against an individual who reports or is about to report a violation or suspected violation a law or regulation or rule promulgated pursuant to a political subdivision of the State of Michigan.

46. Plaintiff reported to the Chief of Staff on April 6, 2011, the person who Defendant Mayor Bing specifically told Plaintiff to notify regarding Defendant Dumas' behavior, that Defendant Dumas violated Executive Order No. 2010-1, entitled "Violence in the Workplace," and created a hostile work environment when Defendant Dumas continued to falsely accuse Plaintiff of failing to respond to emails or follow Defendant Dumas' directives when Plaintiff did, in fact, do so and had proof of her actions; and after the 3:00 p.m. meeting on or about March 31, 2011, Defendant Dumas came into Plaintiff's office, shut the door, shouted at Plaintiff, cursed that she did not want the Chief of Staff to mediate the hostile work environment Defendant Dumas created, refused to leave Plaintiff's office despite repeated requests to do so, refused to allow Plaintiff to leave her own office to escape from Defendant Dumas' tirade, and caused Plaintiff to become visibly and emotionally distraught, as more fully set forth above.

47. After Plaintiff blew the whistle on Defendant Dumas, Defendant Mayor Bing and Defendant Dumas, acting as agents of the Defendant City of Detroit, retaliated against Plaintiff when:

a. Defendant Dumas caused a scene at the mandatory staff meeting regarding workplace violence that the Chief of Staff called to educate the Mayor's staff in Defendant Mayor Bing's presence; and when Defendant Dumas walked out of the meeting in disgust, Defendant Mayor Bing took no corrective action against her, sending the message to his staff that Defendant Dumas' actions were to be tolerated;

b. Defendant Dumas confronted Plaintiff after the workplace violence meeting and stated in a hostile voice that "It's because of you we had this [workplace violence] meeting;

c. Defendant Mayor Bing and Defendant Dumas excluded Plaintiff from important meetings regarding governmental affairs and public policy and then required Plaintiff to perform tasks that would have required Plaintiff to be a part of the meetings in order to perform her duties in a competent and professional manner;

d. Defendant Dumas ordered Plaintiff to negotiate the terms of an illegal contract on behalf of a second lobbying firm with whom Defendant Dumas had a political relationship and to which she wanted to steer work;

e. Defendant Dumas told Plaintiff to interfere in the appointment of the First Lady to the Detroit Zoological Board;

f. Defendant Dumas called Plaintiff a liar about a directive from Defendant Mayor Bing regarding his appointment to the Detroit-Wayne Port Authority;

g. Defendant Mayor Bing told a principal of the City's state lobbying firm that Plaintiff and Defendant Dumas were not getting along and there would be changes to his staff and Plaintiff would have some other role in the Administration. Defendant Mayor Bing's comments indicated Plaintiff was the one who had to be removed from government affairs because of the difficulties with Defendant Dumas; and

h. Defendant Mayor Bing terminated Plaintiff's employment as Executive Assistant to the Mayor II on May 18, 2011, and otherwise discriminated against Plaintiff as a result of her protected activity; and

i. Other acts to be determined during the course of discovery.

48. All of the above actions were in violation of the Whistleblowers' Protection Act, MCL 15.361 *et. seq.*

49. As a direct and proximate result of Defendants' violation of the Whistleblowers' Protection Act, MCL 15.361 *et. seq.*, Plaintiff has suffered and will continue to suffer damages which include, but are not limited to, the following:

- a. Loss of wages and earnings, present and future;
- b. Loss of benefits, present and future;
- c. Mental anguish and emotional distress;
- d. Humiliation, outrage and embarrassment;
- e. Physical pain, suffering, illness and exacerbation of a pre-existing health condition;
- f. Damage to reputation;
- g. Actual attorney fees and costs as provided by MCL 15.363(3);
- h. Other damages as determined by the trier of fact.

WHEREFORE, Plaintiff, ROCHELLE D. COLLINS, respectfully requests that judgment be rendered against the above-named Defendants in whatever amount above Twenty-Five Thousand Dollars (\$25,000.00) which the trier of fact deems appropriate, together with interest, costs and attorney fees.

COUNT II

BREACH OF CONTRACT

Plaintiffs hereby reallege and incorporate by reference, each and every paragraph above, as though fully set forth herein, and further state, in the alternative, the following:

50. Executive Order No. 2010-1 prohibiting violence in the workplace or retaliation for making a report of violence in the workplace created a promise of a legitimate expectation of job security and an express and/or implied contract that Plaintiff would not be subjected to workplace violence and/or would not be terminated for making a report of workplace violence. Furthermore, Defendant Mayor Bing stated to Plaintiff that he wanted to retain her as part of his Administration and stated she performed her duties in a competent manner.

51. Based upon the mandates of Executive Order No. 2010-1 and Defendant Mayor Bing's repeated statements and assurances that he "did not want to lose her" because she was a valuable member of his staff, and Defendant Mayor Bing's directive to Plaintiff to report Defendant Dumas' actions to the Chief of Staff if there were problems with Defendant Dumas' behavior; Plaintiff reported to the Chief of Staff that Defendant Dumas actions constituted workplace violence.

52. Defendant Mayor Bing and Defendant Dumas, acting as agents of the City of Detroit, breached Plaintiff's express and/or implied contract of employment that under the terms and conditions of her employment Plaintiff would not be subjected to workplace violence and/or

would not be terminated for making a report of workplace violence in the following ways:

- a. After Defendant Mayor Bing and Defendant Dumas relieved the Group Executive for Corporate and Civic Affairs of his duties, and because Plaintiff had intimate knowledge of the true facts and circumstances regarding the reason for the Group Executive's departure, they assigned Plaintiff's direct reporting relationship to Defendant Dumas. Defendant Dumas proceeded to "micro-manage" Plaintiff's work responsibilities to a level that was harassing. Defendant Dumas also ordered Plaintiff to move to a smaller office under the pretense that Defendant Dumas needed Plaintiff to be closer to her;
- b. Defendant Dumas continued to falsely accuse Plaintiff of failing to respond to emails or follow Defendant Dumas' directives when Plaintiff did, in fact, do so and had proof of her actions;
- c. After the 3:00 p.m. meeting on or about March 31, 2011, Defendant Dumas came into Plaintiff's office, shut the door, shouted at Plaintiff, cursed that she did not want the Chief of Staff to mediate the hostile work environment Defendant Dumas created, refused to leave Plaintiff's office despite repeated requests to do so, refused to allow Plaintiff to leave her own office to escape from Defendant Dumas' tirade, and caused Plaintiff to become visibly and emotionally distraught, as more fully set forth above.
- d. Defendant Dumas caused a scene at the mandatory staff meeting regarding workplace violence that the Chief of Staff called to educate the Mayor's

staff in Defendant Mayor Bing's presence; and when Defendant Dumas walked out of the meeting in disgust, Defendant Mayor Bing took no corrective action against her, sending the message to his staff that Defendant Dumas' actions were to be tolerated;

- e. Defendant Dumas confronted Plaintiff after the workplace violence meeting and stated in a hostile voice that "It's because of you we had this [workplace violence] meeting;
- f. Defendant Mayor Bing and Defendant Dumas excluded Plaintiff from important meetings regarding governmental affairs and public policy and then required Plaintiff to perform tasks that would have required Plaintiff to be a part of the meetings in order to perform her duties in a competent and professional manner;
- g. Defendant Dumas ordered Plaintiff to negotiate the terms of an illegal contract on behalf of a second lobbying firm with whom Defendant Dumas had a political relationship and to which she wanted to steer work;
- h. Defendant Dumas told Plaintiff to interfere in the appointment of the First Lady to the Detroit Zoological Board;
- i. Defendant Dumas called Plaintiff a liar about a directive from Defendant Mayor Bing regarding his appointment to the Detroit-Wayne Port Authority;
- j. Defendant Mayor Bing told a principal of the City's state lobbying firm that Plaintiff and Defendant Dumas were not getting along and there would be changes to his staff and Plaintiff would have some other role in

the Administration. Defendant Mayor Bing's comments indicated Plaintiff was the one who had to be removed from government affairs because of the difficulties with Defendant Dumas; and

- k. Defendant Mayor Bing terminated Plaintiff's employment as Executive Assistant to the Mayor II on May 18, 2011; and
- l. Other acts to be determined during the course of discovery.

53. As a direct and proximate result of Defendants' breach of express and/or implied contract, Plaintiff has suffered the following damages, including, but not limited to:

- a. Loss of wages and earnings;
- b. Loss of benefits;
- c. Mental anguish and emotional distress;
- d. Physical pain, suffering, illness and exacerbation of a pre-existing health condition;
- e. Humiliation, outrage and embarrassment;
- f. Damage to her reputation;
- g. Other damages as determined by the trier of fact

WHEREFORE, Plaintiff, ROCHELLE D. COLLINS, respectfully requests that judgment be rendered against the above-named Defendants in whatever amount above Twenty-five Thousand Dollars (\$25,000.00) which the trier of fact deems appropriate, together with interest, costs and attorney fees.

COUNT III

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Plaintiffs hereby reallege and incorporate by reference, each and every paragraph above, as though fully set forth herein, and further state, in the alternative, the following:

54. Defendant Mayor Bing and Defendant Dumas' above actions constituted extreme and outrageous conduct, with the intent to cause Plaintiff severe emotional distress and/or were so reckless as to cause Plaintiff severe emotional distress.

55. As a direct and proximate result of the actions of Defendants, the hostile work environment they created, and acts of retaliation against Plaintiff, Plaintiff has suffered the following damages, including, but not limited to:

- a. Mental anguish and emotional distress;
- b. Physical pain, suffering, illness and exacerbation of a pre-existing health condition;
- c. Humiliation, outrage and embarrassment;
- d. Other damages as determined by the trier of fact.

WHEREFORE, Plaintiff, ROCHELLE D. COLLINS, respectfully requests that judgment be rendered against the above-named Defendants in whatever amount above Twenty-five Thousand Dollars (\$25,000.00) which the trier of fact deems appropriate, together with interest, costs and attorney fees.

COUNT IV

LOSS OF CONSORTIUM

The Plaintiffs hereby restate, reallege, and incorporate by reference each and every allegation set forth above, and further plead in the alternative, the following:

56. Plaintiff Oreese Collins, at all times pertinent to this Complaint, was and is the lawfully wedded husband of the Plaintiff Rochelle D. Collins.

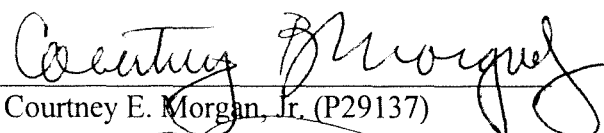
57. As a direct and proximate result of the injuries and damages experienced by Rochelle D. Collins, Plaintiff Oreese Collins has suffered the loss of his wife's consortium,

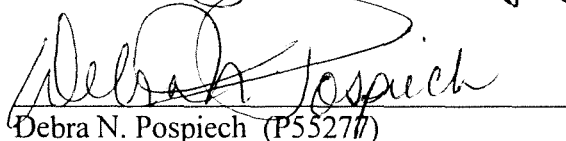
society, and companionship and has suffered emotional distress and anxiety.

WHEREFORE, Plaintiff, OREESE COLLINS, JR. respectfully requests that judgment be rendered against the above-named Defendants in whatever amount above Twenty-five Thousand Dollars (\$25,000.00) which the trier of fact deems appropriate, together with interest, costs and attorney fees.

Respectfully submitted,

MORGAN & MEYERS, PLC

BY: 
Courtney E. Morgan, Jr. (P29137)


Debra N. Pospiech (P55277)

Attorneys for Plaintiff
3200 Greenfield, Suite 260
Dearborn, MI 48120
(313) 961-0130

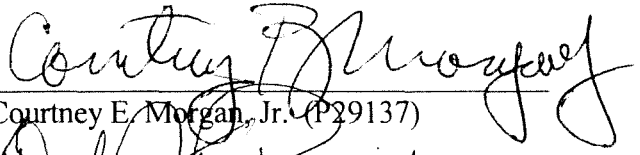
DATED: June 15, 2011

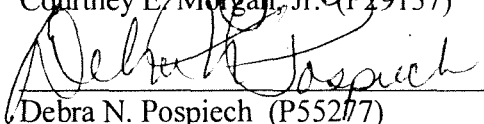
DEMAND FOR JURY TRIAL

NOW COME the above-captioned Plaintiffs, ROCHELLE D. COLLINS and OREESE COLLINS, JR., by and through their attorneys, MORGAN & MEYERS, PLC, and hereby demands a trial by jury in the above-entitled cause of action.

MORGAN & MEYERS, PLC

BY:


Courtney E. Morgan, Jr. (P29137)


Debra N. Pospiech (P55277)

Attorneys for Plaintiff
3200 Greenfield, Suite 260
Dearborn, MI 48120
(313) 961-0130

DATED: June 15, 2011

March 26, 2011

Mayor Dave Bing:

I am writing this letter out of concern for the events that I have personally observed in your office. I respect you and can only hope that you do not approve of the activity that goes on in your office. Please understand that this letter is not intended to be disrespectful or to attack anyone's character. It is only to put you on notice that you have a real issue in your office and it is just a matter of time before it explodes and someone gets hurt physically and politically.

I have only worked in your office for a few months and the things that I have observed are terrible. I have personally watched Karen Dumas personally and professionally destroy people in your office. Anyone who disagrees with her or stands up for what is right and truthful is immediately ostracized, scrutinized, criticized, and ultimately terminated. Ms. Dumas has no rational for the employee terminations. Everyone who she has been instrumental in terminating was people who have not been afraid to confront her malicious behavior.

Prior to coming to your office, I questioned the fact that Ms. Dumas was on your staff. She has a reputation in the community for being dishonest and mean-spirited. Yes, she will buy people little gifts and get them something for their birthday and then stab them in the back and tear them down all in one day. Despite her denial of being an intimate part of the Kilpatrick team, she was and often carried the lies, untruthfulness, and deceit that went along with that administration. In fact, there was a questionable contract that she entered into with the City for public relations work on behalf of Kilpatrick. This is the reason she targeted Darchelle Strickland-Love for termination. Ms. Strickland-Love knew about the contract and when she became Mr. Cockrell's Chief of Staff, she immediately had the contract terminated because it was dishonest and was against City policy. Upon her arrival to your office, Ms. Dumas immediately targeted Ms. Love because she thought that Ms. Love would expose her. Unfortunately, she did not know that Ms. Love is not that kind of person. Unfortunately Mayor Bing, it appears that you did not see through Ms. Dumas' tactics and YOU terminated Ms. Love.

I am concerned about a number of things that I have personally observed about Ms. Dumas. She goes throughout your office and she tears people down. She criticizes everyone else's work, attacks their character, lies about their activity, and demands that the communications team stay away from certain people in the office. Her behavior is absurd in that she does not possess the skills or abilities to perform the jobs of these people, yet she criticizes their work! I do know that Ms. Holmes went to Ms. Dumas to try and talk to her about her behavior in the office. I now feel sorry for Ms. Holmes because Ms. Dumas has gone around the office and attacked her character, criticized her work, talked about her to subordinates, and even criticizes her religious beliefs. I have watched how Ms. Dumas lied to Karla Henderson about Ms. Holmes' character and now Ms. Henderson talks about Ms. Holmes, is mean to

her, and publicly criticizes her work. Again, Ms. Henderson does not have the skills or abilities to assess Ms. Holmes' work, but she does so in an attempt to tear Ms. Holmes down. I have personally witnessed this behavior. Ms. Holmes continues to be professional and has not responded to Ms. Dumas and Ms. Henderson's ignorant and inappropriate behavior.

Mayor, did you know that Ms. Dumas asked a member of her staff to find some dirt on Ms. Holmes because "she has got to go?" This directive was given immediately following the FOIA request for your calendar. Ms. Dumas was adamant about not producing your calendar. When Ms. Dumas could not find any "dirt" on Ms. Holmes, Ms. Dumas immediately ramped up the attack on Ms. Holmes' character and her ability to do the job. Ms. Dumas even stated that she told Ms. Holmes to say that your calendar had been destroyed during the crash of our computers, when in fact your calendar had NOT been destroyed. According to Ms. Dumas, "She (Ms. Holmes) is so dumb. All she had to do was say the calendar was destroyed during the computer crash." Ms. Holmes' refusal to lie about your calendar has caused things to escalate in the office. Ms. Holmes is treated terribly by Ms. Dumas and Ms. Henderson (who is a follower). These two women talk about Ms. Holmes, criticize her, and have engaged in a campaign to destroy Ms. Holmes. Ms. Holmes either has no clue of what these women are doing, or she has chosen to ignore the behavior.

Mayor, I'm concerned about why you are not been appalled by your "communications" chief requesting or even inferring that someone engage in dishonesty about your calendar. Were you present during the conversation where Ms. Dumas said that Ms. Holmes should say that your calendar was destroyed when in fact it was not? If you were, you should have been outraged enough to immediately relieve Ms. Dumas of her duties. I can only hope that you were not privy to this conversation. I will tell you that when Ms. Dumas regurgitated this conversation, it sounded as if you were there and did NOTHING. If Ms. Dumas will lie about a calendar, what else has she lied about and what else will she lie about? Mayor, I'm concerned about your integrity and transparency. I believe that Ms. Dumas did not want the calendar disclosed because someone would question the number of trips that she has taken with you on non-City business, and at the City's expense (i.e., New York—where her daughter attends school).

Ms. Dumas and Ms. Henderson have also engaged in a campaign to destroy Deputy Mayor Saul Green. They talk about him to subordinates. They criticize his mannerisms and say that he doesn't do anything. Again, neither of these women is smart enough to assess Mr. Green's work, but they do it in an attempt to destroy him. Ms. Dumas and Ms. Henderson engages in this behavior in the office as well as in the public. Ms. Dumas has gone as far as to say that you are going to get rid of Mr. Green and elevate Chief Ralph Godbee, who happens to be Ms. Dumas' personal friend. Unfortunately, Mr. Green has no clue of how Ms. Dumas and Ms. Henderson have set out to ruin him. Mayor, do you see a pattern of behavior? Of course, Ms.

Dumas likes Chief Godbee because his character is similar to hers. Unfortunate for Mr. Green, he too has stood up to Ms. Dumas about her inappropriate behavior and her devisiveness and now he is a target as well. Mayor, YOU have allowed this to happen. Mr. Green is of the utmost integrity. He has had a successful career as an attorney and even as the U.S. Attorney. How can you allow Ms. Dumas to spew venom about a man who just wants to do what's right, fair, and who wants everyone to be treated with respect?

Ms. Dumas has also engaged in a successful campaign to alienate and destroy Norm White. From day one, she has been out in the community and in the office criticizing Mr. White and attacking his character. She, along with the Lijanas (Tom and Dan), has tried to tear Mr. White apart in hopes that someday Tom Lijana would become the CFO. Mr. White stood up to Ms. Dumas and confronted her about the attacks against his skills and his character. Unfortunate for Mr. White, he has now been ostracized and alienated from the team. It appears that YOU have allowed Ms. Dumas' comments and behavior to influence your decision about Mr. White.

Mayor, do you even see how YOU have allowed Ms. Dumas to totally destroy what could very well have been a great team? She has picked apart everyone who has been brave enough to stand up for what is right, fair, and truthful. Mayor, this kind of behavior is unacceptable and I feel like a hypocrite by sitting around and watching Ms. Dumas and Ms. Henderson's behavior and watching you as YOU allow this type of behavior to run rampant in your office. I have to speak out. You took this office under the premise that you would be truthful, transparent and demonstrate the utmost integrity. I have watched you as YOU have aligned yourself with Ms. Dumas and allowed her to wreak havoc in your office. The community is questioning your integrity. People are even wondering if you have engaged in some type of intimate relationship with Ms. Dumas and now she has you captive. You are allowing these things to take place and you have chosen to remain silent.

People in the office are afraid to even speak out because they are afraid that you will terminate them if they complain about Ms. Dumas (i.e., Erica Hill, Barbara Patton, Terra DeFoe, Stephanie Young, etc.). Mayor, you can't just sit back and pretend that these things are not happening. I'm young in my career and I noticed this diabolical behavior after being in the office for only 2-3 weeks. At this point, no one will even be honest with you about Ms. Dumas' behavior because they are afraid that they will be terminated or treated nasty, unfairly and poorly like Ms. Holmes.

Ms. Dumas has recently launched a campaign to get rid of Kamau Marable and Rochelle Collins. Mr. Marable is leaving because he knows that Ms. Dumas does not like him and that she will ultimately terminate him. Mr. Marable has witnessed how Ms. Dumas has treated other people and Ms. Dumas knows that he does not approve of her inappropriate behavior. Ms. Collins, who has participated in Ms. Dumas' bashing of other employees, is now the subject of Ms. Dumas' affection. It is just a matter of time before Ms. Dumas terminates her.

Mayor, your office is a hostile work environment. People are walking on pins and needles despite Ms. Dumas' behavior because they are afraid that you will terminate them at Ms. Dumas' request. I'm afraid that Ms. Durnas and Ms. Henderson are going to provoke someone to respond in a violent manner. This is how bad the environment is on the 11th floor. If you don't step in and address this situation, you are at fault and YOU should be held accountable. You have to stand up, Mayor, and stop this woman from destroying your team and your good reputation. You have to do what is right because the people of Detroit are counting on you to not just do right in the public, but to do right even on the 11th floor.

I'm not writing this letter to embarrass you. I'm writing this letter because I fear that someone is going to explode and it won't be pretty. Ms. Dumas is a treacherous woman. She is unhappy with her life and will stop at nothing to destroy people who are happy, truthful, and willing to stand against what is wrong. Mayor, you have to stop this behavior - TODAY. I hope that you will have the character and the courage to stand for what is right and not allow other people to influence and destroy the reputation that you have built for yourself and your family.

If you truly care about this City, you MUST do what is right. You cannot allow others to mistreat people while you stand by and pretend that it's not happening or that you didn't see it. I know that my days are numbered in your office because I too have spoken out against Ms. Dumas' inappropriate, unprofessional, and dishonest behavior. Before I leave, I just want you to know that there is a serious problem in your office and my absence won't make it go away. You have to confront this issue.

Instead of Ms. Dumas trying to assess areas that she has no expertise in, I ask that she assess the success of the communications team. Your message is not in the community among the voters. You have no connection with the church leaders. The community does not even know what you have done over the past year in office. The only message out there is that you are willing to hold a number of meaningless meetings about land use and that you have a revolving door of employees in your office. You cannot get your message into the community when you have a communications chief that does not like people, attacks others, and leads a campaign to destroy the reputation and character of good people.

Mayor, it's not too late to turn this thing around. You can do it, but you must treat the cancer that has invaded your team. Ignoring cancer won't make it go away. I hope that you will make the right decision. I wish you well in your endeavors.

EXECUTIVE ORDER NO. 2010-1

TO: ALL DEPARTMENT DIRECTORS, AGENCY HEADS, BOARDS, COMMISSIONS, MAYOR'S OFFICE, CITY COUNCIL MEMBERS, AND THE CITY CLERK

SUBJECT: VIOLENCE IN THE WORKPLACE

DATE: NOVEMBER 15, 2010

The City of Detroit has a long-standing commitment to promoting a safe and secure work environment for the benefit of its employees and the general public. The City of Detroit is committed to preventing violence against persons receiving City services and participating in City programs.

Employees have the right to work in an environment that is free from violence. As an employer, the City of Detroit will take all affirmative steps necessary to eliminate violence in the City workplace.

Violence in the workplace includes: 1) written or verbal communications, whether direct or indirect, which are of a threatening, intimidating, or coercive nature; 2) the use or threat of physical force, including fighting or horseplay; 3) stalking; 4) vandalism or destruction of property; and 5) the use or possession of any weapon or ammunition, unless the specific weapon or ammunition is authorized by the City for a particular work assignment. Appropriate disciplinary action, up to and including discharge, will be taken against employees who are found to have engaged in such misconduct.

The City of Detroit will not tolerate violence in the workplace, whether committed by or against City employees. In accordance with this Order:

- 1) The City of Detroit shall continue to adhere to a policy of zero tolerance for any form of violence in the workplace;
- 2) The Director of the Human Rights Department shall promulgate and oversee the implementation of a Violence in the Workplace Policy. This Policy shall provide for designation of a City of Detroit Violence in the Workplace Coordinator within the Human Rights Department, appointment of a departmental Violence in the

Workplace Liaison in each City department and agency, reporting and investigation procedures for incidents of workplace violence, appropriate assistance to victims of workplace violence, and training of City of Detroit managers, supervisors, and employees on the Violence in the Workplace Policy;

- 3) The Human Rights Department shall establish a Workplace Violence Hotline and issue Workplace Violence Guidelines on Prevention and Management of Violence;
- 4) The Director of the Human Rights Department shall promulgate amendments to the Violence in the Workplace Policy as may be necessary and proper to effectuate this Executive Order;
- 5) All managers and supervisors shall be responsible for implementing and maintaining safe workplace practices, the City of Detroit Violence in the Workplace Policy, and communicating the Policy to subordinates;
- 6) All Department Directors and Agency Heads shall continually review current security measures at work sites and, where needed, shall implement changes to make work sites safer for City of Detroit employees and the public;
- 7) All employees, including managers and supervisors, shall be responsible for reporting incidents of violence in the workplace or any potentially dangerous situation to their supervisors, the Violence in the Workplace Liaison in each department and agency, the Human Rights Department Workplace Violence Unit, or, where appropriate, to law enforcement authorities;
- 8) Violence in the Workplace Liaisons shall be responsible for implementation of the Violence in the Workplace Policy in their individual departments and agencies in coordination with the City of Detroit Violence in the Workplace Coordinator;
- 9) No person shall be retaliated against for having made a good faith report or complaint or for participating in, or aiding an investigation of, an incident or threat of violence in the workplace; and
- 10) This Order and the Violence in the Workplace Policy does not cover allegations of violence committed by or against sworn police officers in the course of their official duties, which are to be referred to the Office of the Chief Investigator for the Board of Police Commissioners, or, as appropriate, law enforcement authorities.

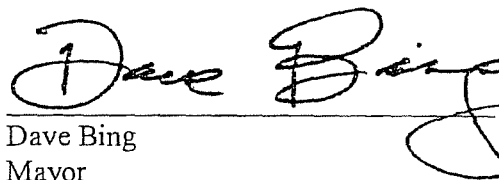


Executive Order No. 2010-1

November 15, 2010

Page 3

Pursuant to the powers vested in me by the 1963 Michigan Constitution and by the 1997 Detroit City Charter, I, Dave Bing, Mayor of the City of Detroit, issue this Executive Order. This Executive Order is effective this date and supercedes Executive Order No. 12 issued by Mayor Dennis W. Archer on May 14, 1999 and reissued by Mayor Kwame M. Kilpatrick on May 27, 2003.

A handwritten signature in cursive script that reads "Dave Bing".

Dave Bing
Mayor