

12/15/2015

Dear Governor Haley,

For several months I have drafted letters to you. I was unsure of whether to follow through with sending one or not. After reading this letter you will understand why I have become so cynical of politics. However, recently I read that you began a program to build relationships between youth and law enforcement. These actions showed a continuation of working on certain issues even when the cameras were gone. Regardless of the future of your political career, you have built a record on issues that include everyone and have invested in the future of South Carolina and our country. This record has shown me that maybe you really are the best person to go to. You have used your positions of power both to serve the people you govern and to create a ripple affect around the country.

In 2011 I was an intern at the Obama for America reelection campaign. Unfortunately, the campaign violated my civil and human rights. For several years I have been trying to hold the campaign accountable. In October of 2014 and February of 2015 I sent two letters to the White House. In April of this year I went on a 17 day hunger strike in DC in front of the White House. Following in May of 2015 I filed a lawsuit. I have watched the events of the past several months. For over two months I listened to both of your speeches to call for the removal of the Confederate Flag from the State House grounds, and for the signing of the bill every single day. Both speeches made me cry and were the most welcomed I felt in the USA in a long time.

The lawsuit I filed is under Section 1981 for racial retaliation. If you read the complaint you will learn some of the details of what happened to me. I also experienced sexual bullying/harassment. No one from the White House, Obama for America, nor the Obama Administration has responded to my letters or contacted me in regards to the lawsuit. For 6 months the Obama for America dodged service.

For years I have been afraid to come forward, but I am now ready to fully confront everything I have been through. I have attached a copy of the complaint I filed. Although I am not a citizen of South Carolina, you seemed to be someone who would not watch idly and allow something like this to happen. If you cannot assist me, I completely understand, but please lead me in the direction of someone who can.

The manner in which you handled the Charleston massacre taught me many lessons. The most important may have been to not be afraid to reach out to people whom you normally would not seek out for help.

There is so much more to my story. If you have any questions please see below for my contact information. I thought it was best to bring this forward because if this happens in silence I truly believe it is detrimental to our country and defending this case could be moving our country in the wrong direction.

Sincerely,

Marisa Adam  
224 East 5<sup>th</sup> Ave  
Roselle, NJ 07203  
[Marisa.adam@gmail.com](mailto:Marisa.adam@gmail.com)  
908.418.7655

Thank you

Marisa Adam  
P.S. I did not mention  
in the complaint that  
I was also a job applic-  
ant, not ~~only~~ just an  
intern. Job applicants are  
protected from refusal to hire.

United States District Court  
Northern District of Illinois

Marisa Belle Adam,  
Plaintiff

vs.

Obama for America,  
Democratic National Committee aka DNC Services  
Corporation  
Defendants

)  
)  
)  
)  
) Case No. 1:15-cv-04043  
)  
)  
)  
)  
)

---

SECOND AMENDED COMPLAINT

This action is brought under 42 U.S.C. § 1981. As an intern at Obama for America (OFA) I was retaliated against between September and December of 2011. As a result of complaining to Human Resources about the lack of racial diversity amongst the interns in, being mistreated and retaliated against by two White female supervisors due to my race, I was made a volunteer, and told by Human Resources that I would no longer be helped with finding a paid position at Obama For America (OFA). Prior to this I reported being mistreated by my team to the Intern Coordinator. I also reported being mistreated by the Intern Coordinator and team to the Political Director of Operations, who served as the supervisor of interns in the Political Department. Afterwards I was told to leave the campaign. I could not work there, and not to complain or tell anyone about what was happening to me in the Political Department.

1. In the fall of 2011 I was an intern at OFA. I was placed in the Political Department with four other White interns. Sunday September 25<sup>th</sup> 2011 I sent the Intern Coordinator, Kate Cummings, an email wanting to discuss the environment of the Political Department (See Exhibit A). On Monday September 26, 2011 I met with Cummings (a White female), about not feeling comfortable in the Political Department. I mentioned that I was the only Black person, was being left out of meetings, and being treated rudely. I asked her to keep the conversation confidential and expressed interest in switching groups. During the week of October 4<sup>th</sup> of 2011 Cummings notified me that she spoke with an intern in the department as well as Abigail Witt (White female), the Political Director of Operations, about my complaint. Witt was the supervisor of the interns in the Political Department. Following this, the treatment I endured from the interns Cummings, and Witt worsened. Nevertheless, throughout the entire duration of my internship I repeatedly asked to switch groups.
2. In early October of 2011, Cummings placed two more White interns in the department. That same month Cummings pulled my hair so she could inspect my scalp, and told me how to wear it. On one occasion while passing in the hall, Cummings touched my skin and said, "oooh". In October I also I asked her to switch groups.
3. In at least two African American affinity staff meetings a member of Human Resources said that diversity was needed and that the numbers were horrible.
4. In November and December of 2011 Cummings and Witt suggested that I look into interning African American Leadership Council several times.
5. On the week of November 28<sup>th</sup>, Witt asked me to meet with her. I declined the invitation. She insisted that I attend the meeting even though I did not want to attend the meeting. I asked a Finance Department staff member for advice on what to do. Cummings followed and watched me speak with the staff member. During the meeting Witt insisted that I speak with the staff member responsible for African American Leadership Council, and told me I could leave the campaign. After the meeting I spoke with the staff member I spoke with prior to my meeting with Witt. She said I could intern for

her, but that she was traveling for two weeks. She said that when she returned she could use my help and give me work to do.

6. After meeting with Witt I emailed the Deputy National Political Director about future opportunities at OFA. The day after sending the email, Witt asked to speak with me and brought me into a room. She began screaming at me, telling me to leave, educate myself, and that I could not work at the campaign. She told me that the Deputy National Political Director sent her the email with my inquiry. I asked why I could not work there and had not been able to switch groups. I brought up that I expressed interest in the Field. Witt said I could not work for the President, and to look elsewhere into nonprofits or Rock the Vote. She said that the Political Department was not an option and that I could intern in the African American Leadership Council because it was good for me. When I told her that department was not hiring I was told that didn't matter. She told me she knew I had something big planned and wanted to know what it was. She asked me if I needed a job and told me people can help me get a job elsewhere, but not at the campaign. Witt told me you don't always get what you want.

During that encounter I expressed to Witt that I wanted to know why I was being treated differently than the other interns. Again I mentioned that I was the only Black intern in the department. I told her what Cummings was doing and that Witt was not supposed to know that I met with and complained to Cummings in September of 2011. I expressed that since that meeting she treated me differently. Witt acknowledged this. Witt told me not to tell anyone what was happening to me in the department. She warned me that some people are emotionless and will stop at nothing. She told me I was not some victim. She told me to stop complaining and to get tough. She told me to check with African American Leadership Council again. Witt then left the room. She immediately went to speak with a staff member I had complained to about my experience at OFA and had asked for help in my direct line of sight.

On one day during the following week I left the office for lunch. When I returned another intern in the Political Department asked me where I went. Witt came to my desk and asked me where I went. I told both of them I went out. From then on to December 15, 2011 I was asked where I was going or my whereabouts several times and watched. Throughout the internship I was afraid to leave my desk.

7. After the incident when I was screamed at by Witt, I went to Human Resources to ask to switch groups or to work with their department twice prior to December 17<sup>th</sup> in order to get away from Witt, Cummings, and the Political Department until my internship for Gen44 would begin, and to see what other options were available. During one of those instances I met with Barisa Meckler. I inquired about Human Resources and other departments to get away from my department. Meckler told me I could not switch to Human Resources. During the other occasion I shared what Witt and Cummings were doing to me with the Director of Human Resources, Sheena Patton. After speaking with the Director I left the office and saw Witt sitting in direct line of sight of the door to the Human Resources office. Witt watched me leave the office. I went back into the Human Resources office and told the Director of Human Resources that Witt was watching outside of the door and that I was scared.
8. On December 16, 2011, Witt pulled me aside at a retreat, screamed at me, and told me to pack my things up and leave. She told me it was my last day. I notified her that I had switched to the Finance Department.
9. On December 17, 2011 I emailed a letter to Human Resources explaining that I was being mistreated and expressed interest in filing a complaint (See Exhibit B).
10. On Monday December 19, 2011, I met with the Human Resources Department (Sheena Patton, Barisa Meckler, and Evera Ivy) and explained how Witt and Cummings were treating me differently due to my race. I explained the lack of racial diversity amongst the interns, and that I was told to leave more than once. I also explained that I was only given African American Leadership Council as an option by Witt and repeatedly approached by Cummings about interning in that cohort. I told Human Resources that Witt told me the Political Department was not an option and that I shared with Witt what Cummings was doing to me. I also detailed that Witt told me not to tell anyone what was happening to me, nor to complain. I explained that I had requested to switch groups numerous times to several staff

members.

The Director of Human Resources asked me what I was going to do and who I would work for when I came in on Monday December 19, 2011. I explained that over two weeks prior to the 19<sup>th</sup> I arranged to intern with Gen44 beginning that day, after the 16<sup>th</sup> of December. The Director of Human Resources made me have the Gen44 staff member confirm to her with that she did agree to allow me to intern for her. I got the staff member and witnessed her confirm my details to the Director of Human Resources.

The Director of Human Resources told me that in the letter that Cummings and Witt wrote her they provided conflicting information from what I was telling her. The Director told me they wrote that I said I would be working with Human Resources. However, I told Witt on December 16<sup>th</sup> that I arranged to switch to the Finance Department. I voiced that the information in their letter wasn't true because I asked Barisa Meckler if I could work with Human Resources, and she told me no. Meckler confirmed this. The Director also brought up details from my complaints from when I complained to her weeks earlier. I seriously expressed extreme fear of retaliation from Cummings and Witt and that I thought they were going to get me. The Director told me in a stern tone I would have to work with Cummings. The Director said she had to meet with Cummings because there were things in her job that had to be addressed.

11. As a result of my complaints to Human Resources against two White supervisors for being mistreated due to my race and the lack of racial diversity of interns, I was made a volunteer on December 19, 2011 (See Exhibit C). The Director of Human Resources told me that she did not want me to meet about positions in different departments that I had scheduled to meet with or with any other departments, and that I would be a volunteer. I was supposed to intern in the Gen44 cohort of the Finance Department, but instead was made a volunteer. That same week I inquired about a position that I had been informed of by Human Resources prior to complaining; I was told that Human Resources would no longer assist me with attaining a paid position.
12. In December of 2011, one intern told me that Witt told him he would be fine with getting a job on the campaign. He was a freshman in college, and he was hired. I expressed interest in switching into the Digital Department prior to December of 2011. Before December 16<sup>th</sup>, one of the interns in the Political Department was allowed to switch to the Digital Department. He was hired into the Digital Department. Another Political intern was allowed to stay in the Political Department and was hired onto the campaign. All six of the White interns were hired or given job offers.

#### DAMAGES

1. I request that the court order the defendant to compensate me the amount of \$6,000,000. There will never be another presidential campaign for Barack Obama again. The opportunity is lost forever. The psychological and professional damage I suffered are irreparable. OFA was extremely negligent and cruel in its dealing with my complaints of retaliation. If I had known that complaining would have escalated into me not receiving the same opportunities as my peers to obtain a position it would have deterred me from complaining about my peers or my supervisors. I was unaware of my rights and thought I was being helped when adverse actions were being taken against me. I constantly feared retaliation and going to the office. I remember not eating lunch and not going to the bathroom because I was anxious and scared of the interns in my department, Cummings, and Witt. I was isolated.
2. During and after the internship I suffered from anxiety, depression, loss of appetite, sleep disturbances, low blood pressure, weight loss, and other conditions. When I was near or had to enter the office I would feel sick and afraid (See Exhibit D). I tried to attend therapy one block from the office, but often could not afford the mental health services I needed. I would have panic attacks and feared leaving the places I lived in. I had severe emotional distress and extreme weight loss. I lost my sense of self. My mother suggested inpatient help upon returning to New Jersey from Chicago. She had to sleep in my bed to monitor me.

3. In 2013, I was hired by Kirkland & Ellis LLP. After two weeks of working there I was fired. When I inquired as to why this measure was taken, I was told I "look bored". I was still suffering from depression and anxiety and did not share my prior experience at OFA with Kirkland & Ellis. I had low self-esteem and self-confidence. I attribute my blank emotionless demeanor and fear of workplaces to the retaliation I experienced at OFA. I still fear workplaces and believe this will stay with me the rest of my life.
4. I was unable to work for two years and experienced great economic hardships as a result of the retaliation and psychological damage elicited by OFA. Some individuals would ask what happened to me, hinting at the character and physical change. I still stare blankly into space and have suicidal thoughts. I have lost all happiness and still fear that I am a danger to myself.
5. After years of trying to hold people accountable, in 2015 I did a 17 day hunger strike in front of the White House to protest the violation of my civil and human rights. I believe I chose this measure because I felt powerless, hopeless, and still have not received justice or any acknowledgement that what happened to me was wrong.
6. I have been made to feel less than others. My cumulative payments since 2011 still have yet to reach half the amount of money most of my former co-interns make in a year. I see people who mistreated me continuously rise in their careers. Understanding this has damaged my sense of self and economic security. I have been made unequal.
7. I was discouraged from making a complaint by my supervisor and warned of retaliation and intimidation if I did so. After repeatedly reporting incidents to Human Resources nothing was done until December 19, 2011 when I was made a volunteer.
8. In January of 2012 I had to call a hotline because I felt like I was going crazy. This was immediately after I left OFA. It was because I suspected and feared retaliation from Witt, Cummings, Human Resources, other staff members, and affiliates of OFA. Had I experienced more retaliation, I would have absolutely no protection because I would have been a volunteer, not an intern. I was stripped of those protections and of opportunities because I complained when I so badly needed them. I had nervous breakdowns as a result of being mistreated at OFA. Upon returning to New Jersey I remember calling a therapist before our first session. I was shaking, having a panic attack, and afraid to go visit a friend in New York City. I was scared I was not going to make it to her session in a few days and needed to talk her.

Often I had to talk to myself to assure myself that I would make it through the night without harming myself. I constantly felt that I could not go on that way and did not know what to do. It seemed as though my survival was based on making it to my next therapy sessions. For months, I rarely got out of bed. I did not want to live and did not think I could go on living that way. My friends and family also recognized this in me. My entire life changed. I feel like a different person since my experience at OFA.

Marisa Adam  
224 E 5<sup>th</sup> Ave  
Roselle, NJ 07203  
908-418-7655

Exhibit A



Marisa Adam <marisa.adam@gmail.com>

(no subject)

Marisa Adam <marisa.adam@gmail.com>

Sun, Sep 25, 2011 at 9:38 PM

To: Kate Cummings <KCummings@barackobama.com>

Aww thanks. I just want to talk to you about the environment. I am having a blast and really happy, but not necessarily comfortable working with some of the interns in the political department. I didn't want to say anything because it's only my first week, and I'm really grateful, feeling really privileged and geeked to even be there. However, I figured it may be better to say something sooner than later. I will explain everything tomorrow.

rest up,  
Marisa

On Sun, Sep 25, 2011 at 9:14 PM, Kate Cummings  
<KCummings@barackobama.com> wrote:

> Marisa,

>

> Yes, I have time. So that I can sleep well, can you give me a hint as to what is wrong? Obviously, I will keep it between us.

>

>

>

> On Sep 25, 2011, at 7:30 PM, "Marisa Adam" <marisa.adam@gmail.com> wrote:

>

>> Hi Kate,

>>

>> I know that I've been emailing you a lot and I really appreciate your  
>> responses. I need to talk to you tomorrow about something that is  
>> confidential and time sensitive. Will you have time tomorrow morning?

>>

>> hope you enjoyed your weekend,

>> Marisa

>>

>

>

## Exhibit B

Dear Sheena, Barisa, and Evera.

I am writing to you to this morning because I am absolutely outraged. Yesterday, I was at the staff retreat. I was pulled aside and harassed in the middle of the retreat.

I told the person, that I had spoken with all of you and that I would be meeting with people on Monday. I told them that I have been speaking with you about my future at OFA 2012. I know that I have expressed my concerns about my situation to the three of you, but I am now honestly thinking of filing a formal complaint. I feel that I have been targeted and it won't stop.

I feel that I am being harassed. I was blatantly told several times to leave the campaign, have experienced bullying, and people breaking confidentiality. I was told to look into other departments, and when I did, all of the sudden it was a problem. After several things that have happened over the past few months I no longer wanted to use the intern coordinator to move along with process at OFA 2012. I expressed this to Barisa and she agreed to look into other departments for me, and that I could come in after the 16<sup>th</sup>. I have also spoken with Sheena and Evera about approaching other departments (Operation Votes and Field). I have spoken to other departments, and one person has even told me that they need help and would take me on as an intern. I was told and emailed several times that it was ok for me to switch departments by the intern coordinator, my intern point of contact, and human resources.

I have emails, documentation on events that have happened, and witnesses. I feel that I have done nothing wrong, and no matter what I do, I am being constantly bothered. I am willing to talk this out with certain individuals, but if that is not successful or an option, I'd like to go through with filing a complaint.

I would like to keep this matter absolutely confidential until further notice. I am not sure of the rules, but since this matter is extremely sensitive, I may want moral support, and may ask Ken Bennett to be there at one point or another throughout the future of my process. He and I are in constant communication, and is someone who I've known the longest out of the people involved in the Obama family. I have expressed my concerns to him and he and I both agree that I should stay and continue to help the president get re-elected.

I am sorry that this situation has escalated to this point, but I have no one else to go to. It is your job to protect the staff and interns, so I have to turn to you. I know that I have been in the office constantly or to see you over the past few weeks, but please do understand that it was because my situation was worsening. I just want to make it clear that I do appreciate your support. You really have no idea what I've been through, but am glad that three of you were there.

I also would like to make sure that no one touches my belongings at the office. I will come talk to you sometime Monday or Tuesday.

Best,

Marisa

## Exhibit C



Marisa Adam <marisa.adam@gmail.com>

---

**(no subject)**

---

**Evera Ivy** <Elvy@barackobama.com>

Wed, Dec 21, 2011 at 11:51 AM

To: Marisa Adam <marisa.adam@gmail.com>

Sorry Marisa, I'm just now reading this...

It's up to you, you have to do what you feel is best.

If it were me, I would probably just move forward at this point and don't look back, just capitalize on the volunteer opportunity you have starting next month. Just keep track of all these issues/situations that took place and if for some reason all this comes up again - you will have a complete list of things you'd like to discuss.

Just come into January, hit the ground running and make a good impression!

Happy holidays, please enjoy them and don't worry about OLD drama!!

Evera

[Quoted text hidden]

## Exhibit D



Marisa Adam <marisa.adam@gmail.com>

---

(no subject)

---

Marisa Adam <marisa.adam@gmail.com>

Mon, Jan 16, 2012 at 12:05 PM

To: Lora Whitticker <lorawhitticker@gmail.com>

Hi Lora,

So I've given it some thought. I want to be honest with you: I need to take a leave of absence. I still think OFA is an amazing opportunity, but due to everything that happened over the past few months I need to take time to get better. I did not tell you everything that happened, but a lot of it was pretty serious (they did a serious number on me). After putting in so much time, I do not want to walk away just yet, but I need to just take time to make sure that I am mentally and emotionally well before I return to OFA (therapy). I do not want to be scared while I am at work, so please, just give me time to figure it out.

best,  
Marisa

[Quoted text hidden]