

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, LAW DIVISION

CHRISTOPHER S. CYNOWA,)
)
 Plaintiff,)
) No. 08 L 403
 v.)
)
 CSSS, INC., Lisa Wolford and)
 Bill Slater)
 Defendants,)

AFFIDAVIT OF NOEL FLANAGAN

I, the Affiant, Noel Flanagan, on oath do state, that if I was called to testify in a court of law, I would testify as follows:

In January 2007, I was employed by Nortel Government Solutions (a/k/a "Nortel") as an independent contractor computer hardware engineer and my work assignment was with the CSSS, Inc. (or CSSS.net –a/k/a "CSSS" – I am not sure what the distinction is –) on the contract with the Department of Veterans Affairs ("VA") located at Hines Building 20, Hines, Illinois, 60141. From September 2007 – December 2007, I worked directly for CSSS. In December 2007, I was hired full time by the VA also located at the Hines, Illinois facility at the job level of GS-13. The work I do for the VA is similar to the work I did while working for Nortel and for CSSS.

During my time on the CSSS contract with the VA, as an independent contractor and in working directly for CSSS, I worked directly under the supervision of one of the defendants in this case, Bill Slater (a/k/a "Slater"). I sat in a cubicle next to Christopher Cynowa, the Plaintiff in this case. On or around January 18, 2007, I happened to be sitting at my desk before, during and after Chris being fired by CSSS. My recollection of what happened follows.

Chris was called into the conference room by Anthony Slatton, who, on information and belief, was a friend of Slater. I saw Chris and Anthony walk up the hall to the conference room and enter the room. I looked down the hall and saw a Hines VA Police Officer standing outside the conference room, whose name, on information and belief, is Bob Androwski. I knew if a Police Officer was present, that Chris was probably going to have something bad happen to him. A few minutes later, Chris, who was now accompanied by the Hines Police Officer, returned to his desk and started packing up his personal belongings. The Police Officer, who was armed with a

gun, stood near Chris while Chris gathered his personal belongings from his desk. While Chris was packing up his belongings, Bill Slater came over and began, in my opinion, to taunt Chris. I don't recall everything Slater said, but I specifically remember that he started saying something to Chris to the effect "Don't be upset. This can be a great experience for you. Hopefully, you'll learn some life lessons from this", etc. The way Slater's comments came across to me is that he was rubbing it in that Chris was just fired. Chris responded to Slater by saying "Leave me alone," but Slater kept antagonizing Chris. After several times of Chris asking Slater to leave him alone, Officer Androwski told Slater that he was not helping the situation and asked Slater to go away from Chris and leave Chris alone. When Chris responded to Slater he was upset, but was in no way threatening or violent. Slater then went to his office. After Chris had left the building, Slater came by my cubicle and said to me "You saw Chris was threatening me, didn't you?" Because Slater was my supervisor and I didn't want to get on his bad side, I just shrugged my shoulders – I did not say "Yes" because Chris never threatened Slater and Slater was in no danger and also there was an armed Police Officer standing there with Chris the entire time Chris was packing up his belongings. Chris seemed upset, but just in the normal way that anyone would be who had just gotten fired from his job. I didn't respond "No" to Slater's question because I was afraid – I knew that if I disagreed with Slater that he might hold it against me and I could also lose my job.

After I had left CSSS in December 2007 and had began as a full time employee with the VA, I was very happy to be working at the VA because I love my job and I was happy not to be under the supervision of Bill Slater. In my opinion, CSSS was a very difficult place to work, and almost everyone liked the work itself, but various people quit rather than work at CSSS and/or work for Slater – in fact, one former Nortel employee, Nick Pervan, wrote an email to me and other employees explaining the reasons he refused to work for CSSS. Slater, in my opinion, was a very difficult manager to work for. By the time I left CSSS, Slater was making me fill out a form to get up from my desk and calling me on my cell phone to check if I was at my desk. Slater was easily offended by anything an employee said or did that was not to his liking and he sometimes lacked compassion for his employees. For example, Slater often wanted his employees to have dinner with him or see his wife belly dance, and if you didn't want to do it, he took it as a sign of disrespecting him – then he'd hold it against you. Another example is, one time, I told Slater I was surprised that he was putting one of my co-workers, Tushar Engregi, on the work schedule because Tushar was off work in bereavement due to the recent death of his grandfather – Slater sarcastically stated to me that he (meaning Tushar) "better be here, he's had enough bereavement time." Later, Tushar confronted Slater about his disrespectful comment which I communicated to Tushar; however, Anthony Slatton defended Slater by recasting Slater's remarks to me as simply a "company policy statement," even though I heard the sarcasm in Slater's voice when he made the statement to me. Almost everyone at CSSS who worked for

Slater had a hard time working with him and office talk between co-workers was often about how much people disliked Slater.

After Slater had left CSSS (I do not recall when he left the employ of CSSS, but I believe it was in early 2008), I happened to see Lisa Wolford, the President/CEO of CSSS at Hines. I told Ms. Wolford that I could not believe that she allowed someone like Bill Slater to be a manager over us because, in my opinion, Slater had been a very bad manager in terms of the way he treated us and exhibited extreme mood swings – first he'd be friendly with you, and then if you said or did the least little thing he didn't like, he would turn against you. Ms. Wolford responded to what I said to the effect that Slater was a "scared" person - I interpreted "scared" to mean that Slater was paranoid.

The first time I ever heard about Chris suing CSSS was in early 2008 - I think I heard it from Bunty Kothari. When the talk was going around the office that Chris had sued CSSS, some of my co-workers and I thought that it was weird that CSSS, Ms. Wolford, and/or Mr. Slater had accused Chris of having a gun. It did not make sense to us because we were all employed at-will and CSSS could have simply fired Chris and given no reason whatsoever. Given that Slater appeared to have falsely accused Chris regarding owning a gun, I understood why Chris sued CSSS, Slater and Ms. Wolford.

In the last month or two, I learned from the VA attorney I might be contacted or questioned regarding this case. On Friday, November 6, 2010, I learned from Chris and his attorney that the Defendants in the case (Lisa Wolford, CSSS, Inc. and Slater) have identified me as the source of the rumor that Chris is dangerous, hot headed and had a gun. I was surprised by this because I never said that Chris was dangerous or that he had a gun, although I may have said in a joking manner that Chris had a temper or was a "hot head" because Chris would complain and act annoyed by unreasonable or stupid situations and procedures – I've heard him complain and make emphatic statements about some user problems after hanging up on a service call – but I never heard him "tell off" or be rude to a customer/user on a call, nor did I ever witness him having any confrontation with co-workers that was in any kind of threatening manner – he just engaged co-workers in normal office debates and joking around.

I do not recall hearing Chris complain about Slater, but most people complained about Slater and I would not be surprised if Chris did too. I never heard Chris say anything negative about Wolford or CSSS.

I never told Slater prior to Chris being fired that Chris had an AK-47 assault rifle, a gun, or any other type of weapon or that Chris had confrontations with the staff. During the time I sat next to Chris' cubicle, I never heard Chris say anything about owning guns or any weapon, I never

heard Chris threaten anyone with violence, nor did I ever fear Chris or think that he would be violent. I never saw Chris have any confrontations with anyone other than normal disagreements and debates over work related procedures or just general office conversations regarding any number of subjects – politics, the economy, etc. In my opinion, based on my experience of working with Chris, he at times could be opinionated, and he was very direct and blunt, but I never perceived Chris to be dangerous person or suspected him of having a weapon. Actually, I thought Chris was a lot of fun to talk to – he liked to joke around a lot.

In my opinion, from what I heard through office talk among co-workers, this whole issue between Chris and CSSS started with the 2006 Christmas/holiday party (I was not at that party). From what was told to me by Slater, at the party Chris made a statement that he likes "Dago" food (at the time Chris's girlfriend was Italian and he was using the ethnic slang to refer to his girlfriend). Lisa Wolford, I believe, is Italian and from what I understand, when she heard Chris use the ethnic phrase "Dago", she was very offended. Slater told me that he had orders from Lisa Wolford to fire Chris the night of that Christmas party, but that he (i.e., Slater) persuaded Lisa not to fire Chris on the spot.

Most of us on the CSSS contract really liked our work that CSSS did for the VA and wanted to get jobs working directly for the VA because, generally, the VA provides more job stability, better benefits (e.g., more vacation and sick days off), more career path opportunities, and opportunities for promotion and advancing to higher pay grades. I believe that Chris also wanted to work for the VA, but given how Slater and Ms. Wolford seemed "out to get" Chris and Slater saying that Chris had an AK-47 or some type of gun/weapon, a temper and confrontations with staff and the fact that Chris lost his government security clearance (you have to pass security checks to be hired for a government job), I don't see how he could get a government job – especially if there is any document or report is in his job records alleging that he has a temper, does not get along with his co-workers and allegedly mentioned that he had an AK-47 assault rifle.

Further Affiant Sayeth Naught,

Noel Flanagan 11/9/10
Noel Flanagan Date

Subscribed to and sworn before me this 9th day of November, 2010.

Theresa V. Johnson
NOTARY PUBLIC

