

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

CHRISTOPHER S. CYNOWA, )  
)  
Plaintiff, )  
)  
v. )  
)  
CSSS, INC., et al. )  
Defendants, )

11 JUL 25 PM 12:54  
CLERK OF COURT  
NO. 08 L 403

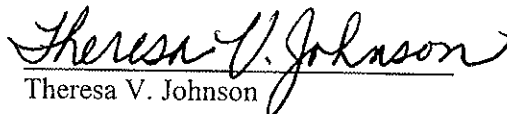
No. 08 L 403

**NOTICE OF FILING**

TO: Kevin Duff  
Rachlis Durham Duff Adler & Peel, LLC  
542 South Dearborn, Suite 900  
Chicago, Illinois 60605  
Phone: (312) 733-3950  
Fax: (312) 733-3952 (fax)

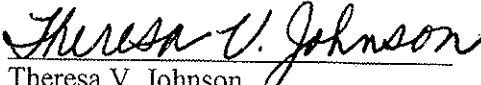
Haytham Faraj  
Puckett & Faraj, PC  
1800 Diagonal Road Suite 210  
Alexandria, VA 22314  
Phone: (703)706-9566  
Fax: (202) 280-1039

PLEASE TAKE NOTICE that on the July 25, 2011, the undersigned caused to be filed with the Cook County Clerk of Circuit Court for the Law Division, the attached copies of **PLAINTIFF'S SECOND AMENDED VERIFIED COMPLAINT AT LAW**, a copy of which is attached hereto.

  
Theresa V. Johnson

**PROOF OF SERVICE**

I, Theresa V. Johnson, the attorney, certify under penalties as provided by law pursuant to 735 ILCS 5/1-109, that the statements set forth herein are true and correct; that I served this NOTICE OF FILING and **PLAINTIFF'S SECOND AMENDED VERIFIED COMPLAINT AT LAW** by causing a copy to be   X   hand delivered and/or   X   emailed and/or        faxed and/or        tendered to each of the parties listed above in open court on July 25, 2011.

Respectfully Submitted,  
  
Theresa V. Johnson  
Attorney for Plaintiff

Theresa V. Johnson  
Law Office of Theresa V. Johnson  
200 E. Chicago Ave., Suite 200  
Westmont, Illinois 60559  
Tel.: 630-321-1330  
Fax: 630-321-1185  
Cook County Atty No.: 37363

IN THE CIRCUIT COURT COOK COUNTY, ILLINOIS  
LAW DIVISION

FD-4

CHRISTOPHER S. CYNOWA,

) 11 JUL 25 PM 12:56

Plaintiff,

)  
)

v.

) Case No.: 08 L 000403

)

)

)

CSSS, INC.

)

(CLIENT SERVER SOFTWARE SOLUTION

)

d/b/a CSSS.NET),

)

LISA WOLFORD,

)

WILLIAM F. SLATER.

)

)

Defendants.

)

**PLAINTIFF'S SECOND AMENDED VERIFIED COMPLAINT AT LAW**

NOW COMES Plaintiff, Christopher S. Cynowa, (hereafter, "Plaintiff" or "Chris"), by and through his attorney Theresa V. Johnson and the Law Offices of Theresa V. Johnson, and complains against Defendants Client Server Software Solutions, Inc. (hereafter, "CSSS"), Lisa Wolford (hereafter, "Wolford"), William F. Slater (a/k/a Bill Slater), (hereafter, "Slater"), (CSSS, Wolford and Slater hereinafter collectively referred to as "Defendants") and state as follows:

**SECTION I. PARTIES AND VENUE**

1. Plaintiff was employed by CSSS, in the position of a Senior Systems Engineer at the Department of Veterans Affairs ("VA") from February 15, 2006, until he was terminated from his employment on January 18, 2007. At the time of filing this lawsuit, Plaintiff resided at 941 Hill Crest Drive, Carol Stream, IL 60188.

2. CSSS provides computer supporting services for Hines Veterans Hospital under federal contract. CSSS local office is located at 2100 S. 5th Ave # 111L, Hines, IL, Building 20; however, CSSS President and headquarters are located at 3906 Raynor Parkway Suite 201, Bellevue, NE 68123. The main office where Defendant Wolford was listed as the registered

agent for service of process is located at 5069 South 108<sup>th</sup> Street, Omaha, NE 68137 (See **GROUP EXHIBIT A**).

3. At the time of filing this lawsuit, Defendant CSSS was not registered as a corporation or as a d/b/a entity in Illinois. (See **EXHIBIT B**).

4. Defendant Wolford, a natural person, is the President of CSSS and resides in Nebraska.

5. Defendant Slater, a natural person, is the site manager and acting representative of CSSS VA Hines contract and is the former CSSS manager and supervisor of Plaintiff. Slater resides at 1409 N. Ashland Ave., Chicago, IL 60622.

6. The acts Plaintiff complains of in this Second Amended Verified Complaint took place in Cook County, IL, and therefore jurisdiction and venue are proper in Cook County.

## **SECTION II. FACTS**

### **FACTUAL BACKGROUND AND CHRONOLOGY OF KEY EVENTS**

1. On December 16, 2006, CSSS sponsored a Holiday Party at Francescas Fiore restaurant in Forest Park, IL. Plaintiff, one other CSSS employee, and three subcontractors were the only non-management staff to attend the Holiday Party.

2. Defendant Wolford, CSSS' President, established a gift "grab bag" and provided three "gifts."

3. Maria Milan, a sub-contractor for CSSS, received the *first gift* - a \$50.00 gift card to a shopping mall.

4. Thiem Khaw, also a sub-contractor for CSSS, received the *second gift* - a \$25.00 or \$40.00 gift card to a shopping mall (Plaintiff is uncertain of the exact amount).

5. Plaintiff received the *third gift* - a coupon worth \$10.00 off the purchase of \$50.00 or more to a Build-a-Bear Workshop and a chocolate candy bar with a coupon on the inside of the wrapper worth 25% off an online FTD flower order.

6. The Plaintiff took the \$10.00 off \$50.00 purchase of a Build-A-Bear workshop and coupon for 25% off an online FTD flowers purchase as a joke, since the gift, unlike the *first* and *second gifts*, was of no value unless the recipient wanted to enroll in a Build-A-Bear workshop or buy flowers online.

7. Plaintiff, along with several of his co-workers, poked fun at both the gift, and the gift giver.

8. During a conversation at the Holiday party with his friends and co-workers, Plaintiff, joking around, referred to himself as a "Pollock" and to his fiancé as a "Dago" (slang derogatory terms referring to persons of Polish and Italian descent respectively).

9. On information and belief, Defendant Wolford is of Italian descent.

10. On December 18, 2006, Defendant Slater, Plaintiff's immediate supervisor and local CSSS manager/representative, in his official capacity, spoke with the Plaintiff regarding the fact that Defendant Wolford wanted to send Plaintiff to sensitivity training because of Plaintiff's comments at the Holiday Party referring to himself as a "Pollock and his fiancé being a "Dago" (hereafter, "ethnic remarks"). Defendant Slater told Plaintiff that when he (Slater) discussed Plaintiff's self-directed ethnic comments with Wolford. Slater told Plaintiff that he (Slater) did not believe that Plaintiff was prejudiced against either ethnic group and that he did not believe Plaintiff needed sensitivity training. Defendant Slater told Wolford that "Pollock" and "Dago" are common everyday colloquial language in Chicago and that Richard J. Daley, Chicago's mayor, allegedly once publicly stated to the effect, "What is a 'dago' doing as the queen of the Irish parade?" (See **EXHIBIT C**, "Purported ethnic slur by Daley sparks great Chicago furor").

11. On January 11, 2007, Defendant Slater asked Plaintiff for a meeting with himself and Anthony Slatton, Senior Systems Engineer (on information and belief, apparently acting as a

witness). Upon entering his office, Defendant Slater told the Plaintiff that his poking fun at the Holiday grab bag "gift" may have been construed as offensive by Defendant Wolford and suggested that the Plaintiff should not speak ill of the Defendant Wolford and/or the "gift" anymore.

12. Plaintiff informed Defendant Slater of his displeasure over the "gift," that he (Plaintiff) would comply with the Defendant Slater's request, and he (Plaintiff) would be searching for new employment.

13. On January 16, 2007, the Plaintiff arrived at work at 6:00 a.m.

14. Through the course of the day on January 16, 2007, Plaintiff was informed that some very high profile email mailbox moves were approved for that night.

15. On January 16, 2007, Plaintiff left the office at 1:30 p.m., went home, took a nap and came back to the office at 7:00 p.m. to perform the high profile email moves; Plaintiff continued to work until 3:30 a.m. on January 18, 2007, and then went home to get some sleep.

16. After awakening on January 18, 2007, Plaintiff checked his work email via the internet and noticed that he had received an email from Defendant Slater stating that Defendant Slater wanted to have a meeting with the Plaintiff in Defendant Slater's office at 10:00 a.m. the following day (January 18, 2007).

17. On January 18, 2007, the Plaintiff arrived at work as usual at 6:00 a.m.

18. Plaintiff's job as Senior Systems Engineer required technical competence with computers and also customer service and personal interaction skills to serve CSSS' VA customer.

19. On January 18, 2007 at 7:59 a.m., Plaintiff sent the following customer satisfaction/survey email ("Email No. 1") (See **EXHIBIT D**) to Lynn Sepple, Plaintiff's main contact for VIP work at Veterans Affairs, requesting her opinion regarding his work performance.

**EMAIL NO. 1**

**From:** Cynowa Chris (CSSS)  
**Sent:** Thursday, January 18, 2007 7:59 AM  
**To:** Sepple, Lynne  
**Subject:** Honest opinion needed

**As one of the most frequent and most important customers, I would like to ask your honest opinion on a few things. If you would be so kind as to give me a rating from 1 to 10 (10 being the best) on the following, I would be most appreciative.**

- 1. Professionalism**
- 2. Competence**
- 3. Technical knowledge**
- 4. Knowing when to escalate and doing so**
- 5. Resolving issues in a timely manner**
- 6. Personal interaction**
- 7. Willingness to go above and beyond to have a job done**
- 8. Attention to detail**
- 9. Following procedures**
- 10. Ensuring complete customer satisfaction;**

**Thank you for your time on this.**

**Chris Cynowa  
Senior Systems Engineer Department of Veterans Affairs  
OL&T – Enterprise Technology Management  
Hines OLFO, Building 20, Hines, IL 60141  
Office: 708-410-4042  
Cell: 630-546-1191  
E-mail: [chris.cynowa@va.gov](mailto:chris.cynowa@va.gov)**

20. On January 18, 2007, time-stamped at 7:39 a.m., Plaintiff received the following Answer from Lynne Sepple (See **EXHIBIT D**):

**EMAIL NO. 2**

**From:** Sepple, Lynne  
**Sent:** Thursday, January 18, 2007 7:39 AM  
**To:** Cynowa Chris (CSSS)  
**Subject RE:** Honest opinion needed

**10 on all. 10+ on 1,6,7,8,10 – in fact 10+ on all too. You are VERY easy to work with, personable, technically competent, and detail oriented. And you the type of worker that you only have to tell you something once – and you've got it.**

21. On January 18, 2007, Defendant Wolford, Larry Carver, Scott Theobald, Defendant Slater and Anthony Slatton were in a telephonic meeting.

22. The purpose of the meeting was to talk about a performance improvement plan and to talk to Plaintiff about his conduct, or to fire Plaintiff.

23. Defendant Slater stated to all present or participating by telephone:

**“Chris has a temper, has had a few verbal confrontations with the staff, and, Chris mentioned having an AK-47 assault rifle.”**  
(Hereinafter, “Defendant Slater’s Statement No. 1”).

24. Pleading in the Alternative, in addition to or in alternative to Defendant Slater’s Statement, Slater stated to all present or participating by telephone:

**“Chris has an automatic weapon – an AK-47. If we bring him in to talk to him about performance improvement, he may ‘Go Postal’.”**  
(Defendant Slater’s Alternative Statement No. 2).

25. Defendant Slater made no effort to verify the truthfulness of the statements.

26. Defendant Wolford made no effort to verify the truthfulness of Defendant Slater’s Statement(s).

27. Mr. Carver proposed that they investigate Defendant Slater’s statements.

28. Defendant Wolford declined to investigate Defendant Slater’s statements and decided that Plaintiff should be fired.

29. On information and belief, Defendant Wolford ordered Defendant Slater to call the VA police to be present during the employee’s firing.

30. On information and belief, Defendant Wolford ordered and/or authorized Defendant Slater to repeat the above-quoted statement to the VA police.

31. On January 18, 2007 around 9:15 a.m., Defendant Slater, asked a VA employee,

Gary Knipple, to call the Department of Veteran Affairs Police Office and request police standby while CSSS supervisors terminated Plaintiff.

32. Hines VA Police Lt. Unthank assigned Officer Bob Adrowski to stand by during Cynowa's termination. (See **EXHIBIT E - DEPARTMENT OF VETERANS AFFAIRS VA POLICE REPORT UOR # 07-01-18-0915**).

33. Officer Bob Adrowski entered and while he waited in Defendant Slater's office Defendant Slater orally repeated the statement he told to the CSSS Managers, that is,

**"Mr. Cynowa has a temper and has had a few verbal confrontations with the staff. Mr. Cynowa mentioned having an AK-47 assault rifle."**

34. An AK-47 assault rifle has the capacity of firing multiple rounds of bullets, with one pull of the trigger.

35. An AK-47 is a machine gun.

36. The Illinois Compiled Statutes state that it is a Class 2 Felony to carry a machine gun or to keep it in a car. 720 ILCS 5/24-1(a)(7)(i).

37. When Slater published this statement to Officer Adrowski, Defendant Slater was acting as an agent and employee of CSSS and in his capacity as an individual.

38. The only persons with knowledge of Defendant Slater's above-quoted statement were Defendant Wolford, Larry Carver, Defendant Slater, Scott Theobald, Anthony Slatton and Officer Adrowski.

39. On January 18, 2007, at around 9:35 a.m., Plaintiff was working on trouble tickets. Finding a proper opportunity for a break, Plaintiff went to Defendant Slater's office and asked Defendants if they could meet before 10:00 a.m.; however, Defendant Slater said "No," come back at 10:00 a.m.



40. Plaintiff checked in again with Defendant Slater at 10:00 a.m., but Defendant Slater stated he would come and get Plaintiff when he (Defendant Slater) would be ready to meet with Plaintiff. Plaintiff continued doing his work and waited for Defendant Slater.

41. On January 18, 2007 between 10:30 a.m. and 11:00 a.m., Anthony Slatton, came to Plaintiff's desk and stated that Defendant Slater wanted to meet with the Plaintiff in the small conference room.

42. When Plaintiff entered the small conference room, Veterans Administration Police Officer Robert Adrowski and Defendant Slater were already there.

43. Participating by telephone, on speakerphone, were CSSS Human Resources Director Scott Theobald, and Defendant Wolford (CSSS President), and CSSS Vice President, Larry Carver.

44. Defendant Slater handed Plaintiff a one page document.

45. Defendant Slater read the document out loud in front of the Plaintiff, Anthony Slatton and Police Officer Adrowski and the document read as follows (See **EXHIBIT F**):

**CONFIDENTIAL COMPANY MEMO**

**To:** Christopher Cynowa, Senior System Engineer

**From:** William F. Slater, Program Manager

**CC:** Anthony Slatton, Senior Systems Engineer

Scott Theobald, HR Director

Lisa Wolford, President

**Date:** January 18, 2007

**Subject:** Termination of Your Employment at CSSS.NET at the VA Hines OIFO

**Chris:**

**At the request of Ms. Lisa Wolford, President of CSSS.NET, your employment with CSSS.NET at the VA Hines OIFO is hereby terminated effective immediately. You are being terminated for the causes of insubordination and for being a disruptive influence in the workplace by engaging in several negative**

**workplace behaviors. These are in violation of your Employment Agreement, and so your employment at CSSS.NET is being terminated.**

**You will surrender your Campus Access Pass immediately. A VA Hines Security Guard will escort you back to your desk to gather and pack any personal belongings you may have. You are now no longer authorized to access any not to access any VA computer or network resources. After you pack your personal belongings, you will quietly leave Building 20 without conversation with others, and be escorted by a Security Guard off the VA Hines facility. You are requested to not return VA Hines facility and if you have any other property that belongs to the VA it must be returned as soon as possible to Ms. Kimberly Griffin via U.S. Postal Service.**

**The CSSS.NET HR Director, Scott Theobald (1-402-393-8059) will contact you regarding final arrangements on your pay and your benefits.**

**Signed,**

**William F. Slater, III, PMP  
Program Manager, CSSS.NET**

46. Plaintiff asked CSSS employee/HR Director Theobald for any and all documentation that led to the decision of terminating Plaintiff's employment. Mr. Theobald told Plaintiff that all he (Plaintiff) was going to get was in the form of this CSSS.NET Confidential Company Memo document. **(EXHIBIT F)**.

47. After reading the CSSS.NET Confidential Company Memo, Police Officer Adrowski escorted Plaintiff to his desk where Plaintiff was allowed to collect his personal belongings.

48. While Plaintiff was walking to his desk and gathering his belongings, Slater made taunting comments to Plaintiff even though CSSS managers had instructed Plaintiff not to speak with anyone.

49. Plaintiff told Slater to leave him alone and responded to the effect that the CSSS employees would know that Defendant Slater was a liar and could not be trusted.

50. Officer Adrowski walked with Plaintiff, who was carrying his belongings, to Plaintiff's car.

51. Upon reaching outside of the building, Plaintiff reached into his jacket pocket for a cigarette.

52. Police Officer Adrowski, looking very concerned at Plaintiff's reach for his cigarette, said to Plaintiff: *"You aren't reaching for a gun are you?"* to which Plaintiff responded *"I don't even own a gun and would surely not be going to jail for the person that had just fired me, I would let the lawyers do the work."*

53. Officer Adrowski then asked Plaintiff: *"Do you have any loaded weapons in your car?"*

54. Plaintiff responded similarly as he did to the first inquiry: *"No, I don't have any weapons in the car and I am not going to "GO POSTAL".*

55. Plaintiff at no time during his employment with CSSS ever stated that he owned or had ever owned an AK-47.

56. Plaintiff, at no time during his employment with CSSS ever stated that he owned a loaded or unloaded weapon (i.e., a "gun").

57. On information and belief, several days after Plaintiff was fired, Slater prepared a report (a memo) to document the action. (**EXHIBIT G**).

58. Slater's report does not mention an AK-47 or a gun of any kind.

59. Neither Defendant Slater nor Defendant Wolford ever pressed charges against Plaintiff for having an unauthorized weapon in VA property.

60. Neither Defendant Slater nor Defendant Wolford ever asked the VA police to investigate whether or not Plaintiff had an unauthorized weapon in VA property.

61. Upon returning to Plaintiff's home on January 18, 2007, Plaintiff promptly applied to The Illinois Department of Employment Security for unemployment benefits and began to search for new employment.

62. On January 18, 2007 at 13:23 p.m., Plaintiff received the following email from Randy Padal (**EXHIBIT H**), another CSSS colleague who was also contracted to do the same work as Plaintiff:

**EMAIL NO. 3**

**From:** Randy Padal  
**To:** ccynowa@yahoo.com  
**Subject:** Job Reference for Hines  
**Date:** Thu, 18 Jan 2007 13:23 p.m.

Chris,

**Nobody really knows 100% what happened but rest assured that your coworkers will miss you here at Hines.**

**I personally appreciated the hard work you did during the migrations. Not many men would work 84 hour weeks for 3 weeks straight and offer not to take a day off at Thanksgiving too. I could always depend upon you to get something done when I needed it done.**

**I am certain you will use Larry as a reference for your time here at Hines. Feel free to also list me as a reference as you will always get a good one from me. I also noted to Mr. George Jackson that you were available for hire if he had any contracts needing a dedicated hard working System Engineer.**

**Take care of yourself and your family,**

**Randy Padal**

63. On information and belief, Defendant Slater discussed Plaintiff's termination from CSSS with Plaintiff's co-workers, including Maria Milan, Thiem Kwan, Mike Cronin, Noel Flanagan, Tushar Engregi, Mike Nikiforis, Bunty Kothari and other persons working at or for CSSS.

64. On information and belief, Slater discussed Plaintiff having an AK-47, having a temper, having confrontation with one or more of Plaintiff's co-workers.

65. On information and belief, Slater made the following statement to one or more of Plaintiff's co-workers:

**“Mr. Cynowa has a temper and has had a few verbal confrontations with the staff. Mr. Cynowa mentioned having an AK-47 assault rifle.”**

66. On information and belief, Defendant Slater told Plaintiff's co-workers that Plaintiff posed a danger in the work place, that Plaintiff had a bad temper and that Plaintiff owned a gun.

67. Defendant Slater discussed Plaintiff's firing with Plaintiff's co-workers.

68. Pleading in addition to Defendant Slater's Statement above or pleading in the alternative, on information and belief, Defendant Slater made the following statement to Plaintiff's co-workers Defendant Slater Alternative State No. 2:”

**“Chris kept a gun in his car. Chris might come back after being fired and ‘Go Postal’ and shoot people.”**

69. The day or so after Plaintiff was fired, Mike Nikiforis and Tushar Engregi, Plaintiff' co-workers came to work second shift (i.e., 4:00 p.m.) and encountered a barrage of people all talking about the rumor that Plaintiff had a gun, that he would “Go Postal”, and someone locked their doors. Nikiforis encountered gossip about Plaintiff and a gun spreading like wild fire.

70. On January 20, 2007, Plaintiff received a telephone call on his cell phone from colleagues with whom he was friendly, Tushar Engreji and Michael Nikiforos, who told Plaintiff, “the word is spreading amongst VA employees that you had or kept a gun in your car and you were going to come in and start shooting people when you got fired. Some co-workers were afraid and wanted to lock the doors.”

71. On January 22, 2007, Plaintiff completed for the Department of Veteran's Affairs,

Hines Police Office a Freedom of Information Act Request form requesting the copy of the Police Report written by the police Officer Bob Adrowski on or about January 18, 2007, concerning Plaintiff's termination of employment.

72. On January 23, 2007, Plaintiff received a "notice of local interview" from the Illinois Department of Employment Security, informing Plaintiff that CSSS was objecting to and fighting against Plaintiff receiving unemployment benefits (**EXHIBIT I**).

73. The Illinois Department of Employment Security scheduled a telephone interview with Plaintiff for February 5, 2007 at 10:00 a.m.

74. On January 26, 2007, Plaintiff filed a motion to abate his child support and daycare obligations for his then 5 year old daughter, since Plaintiff's loss of income prevented Plaintiff from being able to fully fulfill his child support and daycare obligations. The court date was set for February 5, 2007 at the Kane County Courthouse in St. Charles, IL.

75. On January 31, 2007, Plaintiff picked up Officer Bob Adrowski's Police Report printed on the same date – the report (**EXHIBIT J**) redacted all names of parties other than Plaintiff.

76. In the following non-redacted Hines Police Report (**EXHIBIT E**), Officer Adrowski memorialized in writing Slater's Statement to Officer Adrowski (hereafter "Defamatory **Publication No.: 3**");

**DEPARTMENT OF VETERANS AFFAIRS**  
**VA POLICE REPORT UOR # 07-01-18-0915**

**Investigation:**

**On January 18, 2007 at 0915 hrs, I was dispatched to go to bldg 20 around 0950 to standby while an employee is given termination papers. I met with Mr Gary Knippel and he brought me to Mr William Slater's office.**

I waited in Mr Slater's office while he was completing some phone calls. Mr Slater during this time stated "that Mr Cynowa has a temper and has had a few verbal confrontations with the staff. He also said that Mr Cynowa mentioned having an AK-47 assault rifle". Mr Slater was nervous about how Mr Cynowa would react to receiving the termination papers.

Mr Slater and myself walked to the conference room and waited for Mr Cynowa. Mr Cynowa and Mr Slatton walked in and Mr Slater handed Mr Cynowa the termination paper. He appeared to be slightly mad and surprised. He did remain under control and professional. He did ask some questions of Mr Slater and then walked to his desk. He retrieved all his belongings and then handed his badge over to Mr Slater. We then walked to his car and got his parking pass. Before entering his car, I did ask him if he had any weapons in the car. He replied "No, I don't have any weapons in the car and I'm not going to go POSTAL". We walked back upstairs to check if anything was forgotten and then he handed the parking pass over. We then walked back downstairs and he departed the facility. This was around 1047hrs.

**Disposition:**

**This investigation is closed. Mr. Cynowa exited the facility without any incident occurring.**

**Bob Adrowski #3542  
Investigating officer**

77. On February 5, 2007, a Kane County divorce court reduced Plaintiff's child support order from \$486.60 bi-monthly to \$ 73.40 per week based on expected unemployment compensation from CSSS which CSSS challenged.

78. On February 5, 2007, Illinois Department of Employment Security scheduled Plaintiff's interview regarding the circumstances surrounding Plaintiff's termination.

79. The interviewer informed Plaintiff that she would call CSSS for a rebuttal discussion, and that Plaintiff would be notified via mail of the outcome.

80. On or about April 2, 2007, Plaintiff, after 3 months of unemployment, began new employment for a private employer who does not perform work on U.S. federal contracts.

81. Plaintiff was humiliated before the public, his former CSSS managers and co-

workers, by Defendant Slater's Statement and/or Slater's Alternative Statements.

82. Plaintiff suffered severe emotional distress which caused his blood pressure to reach dangerously high levels.

83. Plaintiff sought medical treatment, was treated by a doctor, and was prescribed anti-depressant medication which he took for approximately three months (see **EXHIBIT K**).

**SECTION III. COUNTS**

**COUNT I – Defamation “Per Se”  
JANUARY 18, 2007, DEFAMATORY PUBLICATION  
TO CSSS PERSONNEL**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs

1 through 83 as if fully set forth herein.

84. Defendant Slater's Statement:

**...Mr. Cynowa has a temper and has had a few verbal confrontations with the staff. Mr. Cynowa mentioned having an AK-47 assault rifle.**

was made to Lisa Wolford, Larry Carver, Scott Theobald and Anthony Slatton.

85. Pleading in the alternative, in addition to or in alternative to Defendant Slater's Statement above, Defendant

**“Chris has an automatic weapon – an AK-47. If we bring him in to talk to him about performance improvement, he may ‘Go Postal’”**  
(hereafter, Defendant Slater's Alternative Statement No. 1).

was made to Lisa Wolford, Larry Carver, Scott Theobald and Anthony Slatton.

86. Defendant Slater's statement was false.

87. An AK-47 is a machine gun and automatic weapon.

88. In Illinois an AK-47 assault rifle or an automatic weapon having is a Class 2



Felony.

89. Defendant Slater's statement imputes the commission of a criminal offense on Plaintiff.

90. Defendant Slater's statement prejudices Plaintiff in his profession or trade.

- a. Plaintiff's trade and profession had both technical computer skills component and a customer service/people skills component.
- b. Plaintiff routinely engaged in personal interaction with Defendants co-workers and with CSSS' VA customers.
- c. Plaintiff's alleged bad temper, having confrontations with staff, the threat of physical violence with a gun inherently charges Plaintiff's with inability to perform or discharge his customer service duties.

91. Defendant Slater's statement imputed Plaintiff an inability to perform or a want of integrity in the discharge of duties of employment.

- a. Plaintiff's job had a technical and customer service/people skills component.
- b. Plaintiff's job required getting well with other and not physically threatening them or shooting them.
- c. Plaintiff's alleged bad temper, having confrontations with staff, the threat of physical violence with a gun inherently charges Plaintiff's with inability to perform or discharge his customer service duties.

92. Defendant, Slater, made the defamatory statement individually and as an agent and employee of CSSS.

93. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in

excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT II – Defamation “Per Se”**  
**FURTHER PUBLICATION TO CSSS PERSONNEL**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. Defendant Slater’s Statement:

**“Mr. Cynowa has a temper and has had a few verbal confrontations with the staff. Mr. Cynowa mentioned having an AK-47 assault rifle.”**

was made to Lisa Wolford, Larry Carver, Scott Theobald and Anthony Slatton.

85. Pleading in the alternative, in addition to or in alternative to Defendant Slater’s Statement, on information and belief, Slater made the following statement to Plaintiff’s co-workers (i.e., Maria Milan, Thiem Kwan, Mike Cronin, Noel Flanagan, Tushar Engregi, Mike Nikiforis, Bunty Kothari and other persons working at or for CSSS – hereafter “co-workers et. al.”).

**“Chris kept a gun in his car. Chris might come back after being fired and ‘Go Postal’ and shoot people.”** (hereafter, Slater’s alternative Statement No. 2)

86. Defendant Lisa Wolford did not repeat Defendant Slater’s statement to anyone.

87. Larry Carver did not repeat Defendant Slater’s statement to anyone.

88. Scott Theobald did not repeat Defendant Slater’s statement to anyone.

89. Anthony Slatton did not repeat Defendant Slater’s statement to anyone.

90. Pleading in the alternative, Defendant Lisa Wolford, Larry Carver, Scott

Theobald and/or Anthony Slatton or some other CSSS manager, repeated Defendant Slater's statement to other CSSS personnel.

91. Pleading in the alternative, when Defendant Lisa Wolford, Larry Carver, Scott Theobald and/or Anthony Slatton or other CSSS manager repeated Defendant Slater's statement to other CSSS personnel they were acting as agents and employees of CSSS.

92. When Defendant Slater made the statement to Officer Adrowski there was no one else in Defendant Slater's office.

93. The day Plaintiff was fired, Mike Nikiforis and Tushar Engregi, Plaintiff's co-workers came to work second shift (i.e., 4:00 p.m.) and encountered a barrage of people all talking about the rumor that Plaintiff had a gun, that he would "Go Postal", and someone locked their doors. Nikiforis encountered gossip about Plaintiff and a gun spreading like wild fire.

94. Several days after Plaintiff was fired, Tushar Engregi and Mike Nikiforos spoke with Plaintiff by telephone and told Plaintiff that he was being accused of having a gun and maybe "Going Postal" after getting fired. A reasonable inference is that it was Defendant Slater who repeated his statement or his Alternative Statement No. 2 to other employees or – subcontractors of CSSS.

95. Defendant Slater's Statement was false.

96. An AK-47 is a machine gun and an automatic weapon.

97. In Illinois an AK-47 assault rifle or an automatic weapon having is a Class 2 Felony.

98. Defendant Slater's statement imputes the commission of a criminal offense on Plaintiff.

99. Defendant Slater's statement prejudices Plaintiff in his profession or trade.

- a. Plaintiff's job had both technical computer skills component and a customer service/people skills component.
- b. Plaintiff routinely engaged in personal interaction with Defendants co-workers and with CSSS' VA customers.
- c. Plaintiff's inter personal skills required frequent interaction with the VA's customers and required that Plaintiff not display a temper, have confrontations with staff and mentioning owning an AK-47 assault rifle or any other gun of weapon for harming people.

100. Defendant Slater's statement imputed Plaintiff an inability to perform or a want of integrity in the discharge of duties of employment.

- a. Plaintiff's job had a technical and customer service/people skills component.
- b. Plaintiff's job required getting along well with others and not physically threatening them or shooting them.
- c. Plaintiff's alleged bad temper, having confrontations with the threat of physical violence with a gun, if true, is inherently contrary to Plaintiff's ability to perform or discharge his duties of employment.

101. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

102. Defendant, Slater, made the defamatory statement individually and as an agent and employee of CSSS.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT III – Defamation “Per Se”  
PUBLICATION TO OFFICER ADROWSKI**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. On January 18, 2007, Defendant Slater on behalf of CSSS, with full knowledge and approval from Lisa Wolford and Scott Theobald, as agents for CSSS, published the following statement to Officer Adrowski: “[Chris] has a temper and has had a few verbal confrontations with the staff...[and Chris] mentioned having an AK-47 assault rifle”.

85. The above-statement to Officer Adrowski was not made for the purpose of instituting legal proceedings or to report an issue of paramount importance.

86. Defendant Slater’s statement was false.

87. An AK-47 is a machine gun and an automatic weapon.

88. In Illinois, having an AK-47 assault rifle or an automatic weapon is a Class 2 Felony.

89. Defendant Slater’s statement imputes the commission of a criminal offense on Plaintiff.

90. Defendant Slater’s statement prejudices Plaintiff in his profession or trade.

- a. Plaintiff’s job had both technical computer skills component and a customer service/people skills component.
- b. Plaintiff routinely engaged in personal interaction with Defendants co-workers and with CSSS’ VA customers.
- c. Plaintiff’s inter-personal skills required frequent interaction with the VA’s customers and required that Plaintiff not display a temper, have confrontations with staff and mentioning owning an AK-47 assault rifle or any other gun of weapon for harming people.

91. Defendant Slater’s statement imputed Plaintiff an inability to perform or a want of integrity in the discharge of duties of employment.

- a. Plaintiff’s job had a technical and customer service/people skills component.

- b. Plaintiff's job required getting along well with others and not physically threatening them or shooting them.
- c. Plaintiff's alleged bad temper, having confrontations with the threat of physical violence with a gun, if true, is inherently contrary to Plaintiff's ability to perform or discharge his duties of employment.

92. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

93. Defendant, Slater, made the defamatory statement individually and as an agent and employee of CSSS.

94. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT IV – Defamation “Per Quod”**  
**JANUARY 18, 2007, PUBLICATION TO CSSS PERSONNEL**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. Defendant Slater's statement was made to Lisa Wolford, Larry Carver, Scott Theobald and Anthony Slatton.

85. Defendant Slater's statement to the above CSSS personnel is false and defamatory

“per quod” because the statements that Plaintiff “has a temper” and has “an AK-47 assault rifle,” taken together, characterize Plaintiff as a work-place terrorist or as a disgruntled employee that is about to “Go Postal”.

86. No one from CSSS had ever seen Plaintiff with a gun nor was there any statement made by Christopher Cynowa himself that he possessed a gun.

87. The impact of CSSS’ oral statements to others is a perceived workplace terror threat.

88. Defendant Slater’s statement imputes Plaintiff with the commission of a criminal offence.

89. Defendant Slater’s statement caused CSSS employees to believe that the Plaintiff would “go postal ” and commit an act of workplace terror.

90. The foregoing defamatory statement was made by Defendant Slater with knowledge of its falsity, with actual malice, or with reckless disregard for the truth.

91. Defendant, Slater, made the defamatory statement individually and as an agent and employee of CSSS.

92. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

93. As a proximate result of the afore-named defamatory statements by Defendant Slater, Plaintiff suffered damages and injuries as follows:

- (a) Loss of his job;
- (b) Loss of wages in the approximate amount of \$16,923.08 and benefits for 11 weeks from January 18, 2007, until April 2, 2007, including medical benefits of approximately \$1,060.00;

- (c) Inability to pay adequate child support for his 5 year old daughter;
- (d) Injuries to professional and personal reputation;
- (e) Humiliation and emotional and physical distress.
- (f) Having to seek medical treatment and take medication.
- (g) Loss of his security clearance at Hines VA.
- (g) Loss of ability to be placed on other federal contracts.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT V – Defamation “Per Quod”**  
**FURTHER PUBLICATION TO CSSS PERSONNEL**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. Defendant Slater’s statement was made to Lisa Wolford, Larry Carver, Scott Theobald and Anthony Slatton.

85. Defendant Slater’s statement to the above CSSS personnel is false and defamatory “per quod” because the statements that Plaintiff “has a temper” and has “an AK-47 assault rifle,” taken together, characterize Plaintiff as a work-place terrorist or as a disgruntled employee that is about to go postal.

86. Defendant Lisa Wolford did not repeat Defendant Slater’s statement to anyone.

87. Larry Carver did not repeat Defendant Slater’s statement to anyone.

88. Scott Theobald did not repeat Defendant Slater’s statement to anyone.

89. Anthony Slatton did not repeat Defendant Slater’s statement to anyone.



90. Pleading in the alternative, Defendant Lisa Wolford, Larry Carver, Scott Theobald and/or Anthony Slatton repeated Defendant Slater's statement to other CSSS personnel.

91. Pleading in the alternative, when Defendant Lisa Wolford, Larry Carver, Scott Theobald and/or Anthony Slatton repeated Defendant Slater's statement to other CSSS personnel they were acting as agents and employees of CSSS.

92. When Defendant Slater made the statement to Officer Adrowski there was no one else in Defendant Slater's office.

93. Several days after he was fired, Plaintiff learned, from his former co-workers, Tushar Engregi and Mike Nikiforos, that Plaintiff was accused of having a gun and maybe going postal. A reasonable inference is that it was Defendant Slater who repeated his statement to other employees of CSSS.

94. Defendant Slater's statement made to other CSSS personnel is false and defamatory "per quod" in that it was about Plaintiff and the statement was false.

95. No one from CSSS had ever seen Plaintiff with a gun nor was there any statement made by the Christopher Cynowa himself that he possessed a gun. The impact of CSSS' oral statements to others is a perceived workplace terror threat.

96. Defendant Slater's statement imputes Plaintiff with the commission of a criminal offence.

97. Defendant Slater's statement caused CSSS employees to believe that the Plaintiff would "go postal" and commit an act of workplace terror.

98. The foregoing defamatory statement was made by Defendant Slater with knowledge of its falsity, with actual malice, or with reckless disregard for the truth.

99. Defendant, Slater, made the defamatory statement individually and as an agent and employee of CSSS.

100. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

101. As a proximate result of the afore-named defamatory statements by Defendant Slater, Plaintiff suffered damages and injuries as follows:

- (a) Loss of his job;
- (b) Loss of wages in the approximate amount of \$16,923.08 and benefits for 11 weeks from January 18, 2007, until April 2, 2007, including medical benefits of approximately \$1,060.00;
- (c) Inability to pay adequate child support for his 5 year old daughter;
- (d) Injuries to professional and personal reputation;
- (e) Humiliation and emotional and physical distress.
- (f) Having to seek medical treatment and take medication.
- (g) Loss of his security clearance at Hines VA.
- (g) Loss of ability to be placed on other federal contracts.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT VI – Defamation “Per Quod”  
PUBLICATION TO OFFICER ADROWSKI**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. On January 18, 2007, Defendant Slater on behalf of CSSS, with full knowledge and approval from Lisa Wolford and Scott Theobald, as agents for CSSS, published the following statement to Officer Adrowski: “[Chris] has a temper and has had a few verbal confrontations with the staff...[and Chris] mentioned having an AK-47 assault rifle”.

85. The above-statement to Officer Adrowski was not made for the purpose of instituting legal proceedings or to further a paramount issue of social importance.

86. Defendant Slater’s statement made Officer Adrowski is false and defamatory “per quod” in that it was about Plaintiff and the statement was false.

87. No one from CSSS had ever seen Plaintiff with a gun nor was there any statement made by the Christopher Cynowa himself that he possessed a gun.

88. The impact of CSSS’oral statements to others is a perceived workplace terror threat.

89. Defendant Slater’s statement imputes Plaintiff with the commission of a criminal offence.

90. Defendant Slater’s statement caused CSSS employees to believe that the Plaintiff would “go postal” and commit an act of workplace terror.

91. The foregoing defamatory statement was made by Defendant Slater with knowledge of its falsity, with actual malice, or with reckless disregard for the truth.

92. Defendant, Slater, made the defamatory statement individually and as an agent and employee of CSSS.

93. Defendant Wolford, individually and as an agent and employee of CSSS, ordered Defendant Slater to make the false and defamatory statements.

94. Defendant CSSS and Defendant Wolford failed to stop and prevent their agent

and employee, Defendant Slater, from repeating a statement that they knew or should have known was false.

95. As a proximate result of the afore-named defamatory statements by Defendant Slater, Plaintiff suffered damages and injuries as follows:

- (a) Loss of his job;
- (b) Loss of wages in the approximate amount of \$16,923.08 and benefits for 11 weeks from January 18, 2007, until April 2, 2007, including medical benefits of approximately \$1,060.00;
- (c) Inability to pay adequate child support for his 5 year old daughter;
- (d) Injuries to professional and personal reputation;
- (e) Humiliation and emotional and physical distress.
- (f) Having to seek and pay for medical treatment and take medication.
- (g) Loss of his security clearance at Hines VA.
- (g) Loss of ability to be placed on other federal contracts.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT VII**  
**FALSE LIGHT AGAINST ALL DEFENDANTS**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. In the Information Technologies (“IT”) Industry in which Plaintiff worked, personal reputation and references are of utmost importance and Plaintiff’s credibility, both personal and professional was severely compromised by CSSS’S false statement.

85. Defendant Slater's statement, published to CSSS personnel on January 18, 2007, published to Officer Adrowski on January 18, 2007 and published to other CSSS personnel, is false and defamatory "per se" in that it imputes Plaintiff with the commission of a crime and they state that Plaintiff is unable to control his temper (a necessary virtue of an office worker) even to the extent of using an AK-47 assault rifle (which Plaintiff allegedly possessed or said he possessed) in response to information of termination.

86. Plaintiff was placed in a false light before the public as a result of the CSSS' actions because the publications made orally and subsequently reduced to writing by Officer Adrowski, and were communicated to Plaintiff's colleagues, friends and co-workers. Some of those persons took the publication seriously – i.e., that Plaintiff had an AK - 47 assault rifle or gun and that he posed a likely threat of workplace terror was and some co-workers, fearful for their safety, requested a "lock-down" of the building.

87. The false light in which the Plaintiff was placed would be highly offensive to a reasonable person.

88. CSSS acted with actual malice, that is, with knowledge that the statements were false or with reckless disregard for whether the statements were true or false. CSSS had no cause to ever believe that Plaintiff was a dangerous person or whether Plaintiff actually owned any firearms.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

**COUNT VIII**  
**INTENTIONAL INFLICTION OF EMOTIONAL**  
**DISTRESS (IIED) AGAINST ALL DEFENDANTS**

1-83. Plaintiff, Christopher Cynowa, re-alleges and incorporates by reference paragraphs 1 through 83 as if fully set forth herein.

84. Defendants' false statements that Plaintiff "has a temper" and has "an AK-47 assault rifle, taken together, characterize Plaintiff as a work-place terrorist.

85. Defendants' conduct was extreme and outrageous and goes beyond all possible bounds of decency, and is to be regarded as intolerable in civilized society.

86. Defendants' conduct directly caused Plaintiff severe emotional distress. Plaintiff was forced to obtain medical attention and medications for emotional distress as a direct result of the Defendants' extreme and outrageous conduct.

87. Defendants either intended to inflict severe emotional distress upon Plaintiff or knew that there was a high probability that their conduct would cause severe emotional distress to Plaintiff.

88. Defendants' intentional infliction of emotional distress resulted additional grave injury to Plaintiff as follows:

- (a) Plaintiff' blood pressure reached dangerous levels.
- (b) Plaintiff incurred medical expenses.
- (c) Plaintiff suffered financial injury in excess of \$16,900.00 for loss and other damage for late payment of his bills.
- (d) Plaintiff lost his ability to support himself, his 5 year old child, his fiancé, and his fiancé's 3 minor children.
- (e) Plaintiff suffered serious damage to his professional reputation.


- (f) Loss of his security clearance at Hines VA.
- (g) Loss of ability to be placed on other federal contracts.

**WHEREFORE**, Christopher S. Cynowa, prays for judgment in his favor and against Defendants CSSS, Inc., Lisa Wolford and William Slater, jointly and severally, in an amount in excess of \$50,000.00, for punitive damages in an amount to be determined by the jury and for costs.

Date: July 25, 2011

Respectfully submitted,

**CHRISTOPHER S. CYNOWA**

By:   
Theresa V. Johnson  
One of Plaintiff's Attorneys

Theresa V. Johnson  
Attorney at Law  
Law Office of Theresa V. Johnson  
200 E. Chicago Ave. Suite 200  
Westmont, IL 60559  
Tel: 630-321-1330  
Fax: 630-321-1185  
Cook County ID: 37363

**ATTORNEY'S STATEMENT**

I, the undersigned, state that I am the attorney of record in the above entitled cause and representing the party who has signed the foregoing pleading. My business address is 200 East Chicago, Suite 200, Westmont, Illinois 60559. I certify that I have read the foregoing pleading and that to the best of my knowledge, information, and belief, formed after reasonable inquiry of my client, said pleading, and it is well-grounded in fact and is warranted by existing law or good faith argument for the extension, modification, or reversal of existing law, and that said pleading is not interposed for any improper purpose, such as to harass or cause unnecessary delay or needless increase in the cost of litigation.

*Theresa V. Johnson*

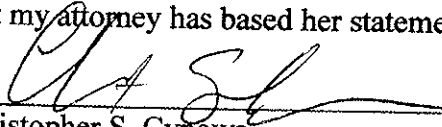
THERESA V. JOHNSON

Dated: *July 25, 2011*



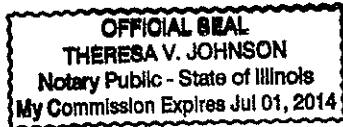
**CLIENT'S VERIFICATION**

UPON PENALTY OF PERJURY, I, the undersigned, state that I have read the foregoing pleading and I further state that I have provided to the attorney who prepared this document information which, to the best of my knowledge and belief, is true and accurate. I further state that his pleading is being served and filed with my consent and as part of my attorney's required duties in representing me. I further state that my attorney has my consent and my direction and that my attorney has based her statements on the factual information provided to her by me.

  
Date: 7/25/11  
Christopher S. Cynowa

Sworn and subscribed to before me on this 25 day of JULY, 2011.

  
NOTARY PUBLIC



Theresa v. Johnson  
Attorney at Law  
Law Office of Theresa V. Johnson  
200 East Chicago Ave. Suite 200  
Westmont, IL 60559  
Tel.: (630) 321-1330  
Fax: (630) 321-1185

# **EXHIBIT A**



## Nebraska.gov

- Ag & Natural Resources
- Agency Directory
- Corporate Image Searches
- Facts About Nebraska
- Health & Safety
- Moving
- NIS - Nebraska Information System
- State Employee Directory
- Visiting Nebraska
- Your Government

### State Agencies

- Attorney General
- Court System
- Dept. of Agriculture
- Dept. of Labor
- Dept. of Revenue
- Fire Marshal
- Game & Parks
- Governor
- Health & Human Svcs
- Motor Vehicles
- Secretary of State
- State Auditor
- State Treasurer

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Did you mean: [CSS.net](#)

Your search - **CSSS.net** - did not match any documents.

### Suggestions:

- Make sure all words are spelled correctly.
- Try different keywords.
- Try more general keywords.

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**PLAINTIFF'S  
EXHIBIT  
A**



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 Fri Jan 11 15:06:09 2008

**NEW SEARCH** **SHOPPING CART**

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Entity Name		SOS Account Number	
CLIENT/SERVER SOFTWARE SOLUTIONS, INC.		1565372	
<b>Principal Office Address</b>		<b>Registered Agent and Office Address</b>	
Not Available		LISA N. WOLFORD 5069 SOUTH 108TH ST OMAHA, NE 68137	
Nature of Business	Entity Type	Date Filed	Account Status
COMPUTER SOFTWARE CONSULTING	Domestic Corp	Jul 22 1997	Active
Corporation Position	Name	Address	
<b>President</b>	LISA WOLFORD	3202 S 90TH AVE OMAHA, NE 681240000	
<b>Treasurer</b>	LISA WOLFORD	3202 S 90TH AVE OMAHA, NE 681240000	

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If a check box is visible, the document may be retrieved online, otherwise you must contact the Secretary of State's office to obtain a copy of the document.

Code	Trans	Date	Price
AP	Articles Perpetual	Jul 22 1997	
PP	Proof of Publication	Sep 03 1997	
<input type="checkbox"/>	TR Tax Return	Mar 31 1999	\$0.45 = 1 page(s) @ \$0.45 per page
<input type="checkbox"/>	TR Tax Return	Apr 18 2000	\$0.45 = 1 page(s) @ \$0.45 per page
<input type="checkbox"/>	TR Tax Return	Feb 05 2001	\$0.45 = 1 page(s) @ \$0.45 per page

*Group*  
**EXHIBIT A**  
**Cynowa v. CSSS**  
 2 of 6

<input type="checkbox"/>	<b>TR</b>	Tax Return	Jan 18 2002	45 = 1 page(s) @ \$0.45 per page
<input type="checkbox"/>	<b>TR</b>	Tax Return	Jan 22 2003	\$0.45 = 1 page(s) @ \$0.45 per page
<input type="checkbox"/>	<b>AO</b>	Change of Agent or Office	Mar 04 2003	\$0.45 = 1 page(s) @ \$0.45 per page
<input type="checkbox"/>	<b>TR</b>	Tax Return	Jan 21 2004	\$0.45 = 1 page(s) @ \$0.45 per page
<input type="checkbox"/>	<b>TR</b>	Tax Return	Feb 28 2006	\$0.45 = 1 page(s) @ \$0.45 per page

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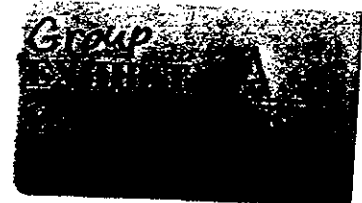
[Click Here](#) to view FAQ for explanation for requesting a Letter of Good Standing available online or Certificate of Good Standing available from Secretary of State's office.

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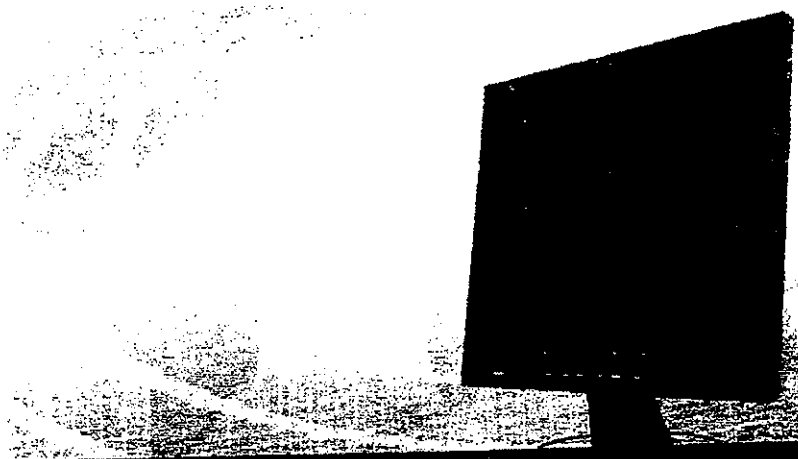


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Office Locations

Washington, D.C.  
 729 15th Street NW  
 Suite 600  
 Washington, DC 20005  
 Telephone 202.393.5464  
 Fax 202.393.5468

Corporate Office  
 Bellevue, Nebraska  
 3908 Raynor Parkway  
 Suite 201  
 Bellevue, NE 68123  
 Telephone 402.393.8059  
 Fax 402.393.1825



### System Engineering and Integration

- ✓ SDVCSB
- ✓ 6(a)
- ✓ SDB
- ✓ WEE

November 23, 2007 - Ex-Marine breaks into business of government technology

Lisa Wolford's name is followed by adjectives not typically found among defense company CEOs - [read more...](#)

November 20, 2007 - Northrop Grumman will mentor CSSS.NET through the Mentor-Protégé Program

The National Geospatial Intelligence Agency (NGA) has awarded a new Mentor-Protégé Program agreement to Northrop Grumman, which will mentor CSSS.NET - [read more...](#)

August 23, 2007 - First-ever

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- Systems Integrator of the Year
- MSFA First Line of Defense
- Entry Form
- Dealer of the Year Entry Form
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- Media Partner

Financial Services Guide > Financial Services Guide Listings > C

**Company Information:**

**Name:** CSSS, Inc.  
**Address:** 401 W. Lincoln Ave.  
Anaheim, CA 92805-2911

**UNITED STATES**  
**Phone:** (800) 995-1489  
**Fax:** (800) 707-8818  
**Email:** [bj@central-station.com](mailto:bj@central-station.com)  
**Website:** [www.central-station.com](http://www.central-station.com)

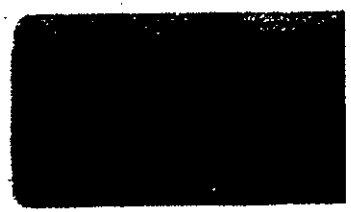
**Company Description**

CSSS, Inc. has been in business for 29 years. We have one of the most experienced teams in the industry with an average employee experience of 7.5 years, and an average senior staff experience of 14.5 years. We are dedicated to providing the highest quality of monitoring services for all technologies and industries.

**Other Services:**

- Central station monitoring

Back to Top



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# **EXHIBIT B**

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PLAINTIFF'S  
EXHIBIT

**B**

## **CORP/LLC - CERTIFICATE OF GOOD STANDING**

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# **EXHIBIT C**

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Purported ethnic slur by Daley sparks great Chicago furor

Milwaukee Journal Sentinel, The, Apr 5, 1998 by STEPHEN BRAUN

A lot gets done in this town by political muscle. Favors are redeemed, strings are pulled and, presto: Street people become landed voters. Neighborhoods disappear and highways emerge in their place. Lifelong political vendettas are forgotten.

Chicagoans last week witnessed a phenomenon that is startling even for a place inured to the excesses of civic life. Something happened or did not happen in a City Hall meeting room filled with people, an event so disputed that it left the town's popular mayor, Richard M. Daley, near tears and provoked a running battle with a politically seasoned columnist for the Chicago Tribune.

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Last week, Chicagoans have debated whether Daley might have uttered an ethnic slur about a 20-year-old college student with an Italian surname and Irish heritage who was crowned queen of the city's St. Patrick's Day parade. Columnist John Kass quoted the parade queen, Jennifer Battistoni, as saying she had overheard Daley laughingly refer to her as a "dago" during a photo session last month before a crowded City Hall news conference. Battistoni, Kass wrote, then confronted the mayor, who began sweating and "started giggling; you know, the way people do when they're nervous." Daley, crimson-faced and shaken, called a news conference to deny the remarks. He was seconded by Battistoni, who insisted that she had never heard the mayor using the slur and that Kass, a veteran of Chicago political coverage, had gotten it wrong. "I know my words sometimes get tangled and I leave you wondering just what it is I was trying to say," said Daley, who inherited his penchant for mangling English into tortured syntax from his father, onetime Mayor Richard J. Daley. "But this was not one of those times." Battistoni, who could not be reached for comment, denied on a radio talk show that she had heard any slur. Kass has declined to elaborate outside the confines of three columns. But James O'Shea, the Tribune's deputy managing editor for news, said that the college student's mother worked as a city police officer and that both were "obviously getting jittery" and susceptible to pressure from City Hall to change their story. The furor harks back to a legendary 1989 controversy, Kass reminded his readers, over a statement Daley made to a gathering of supporters as he prepared for his first mayoral election against Timothy C. Evans, a black politician running as the heir to the late Mayor Harold Washington. Evans' backers howled that Daley, referring to Washington's fractious tenure, had been overheard saying it was time Chicago had a "white mayor." Daley replied that he had been talking about a "wet mayor" a reference, he said, to a joke about drinking. The reported remark had no bearing on the election; Daley breezed to victory. Now, a similar purported quip that could maim the careers of most politicians is again glancing off. O'Shea marveled at Daley's seeming invulnerability to bad press a testament to his political clout and his undiminished popularity with Chicagoans. "I don't think it's damaging him," O'Shea said. "Half the people believe him,

Hizzoner: Richard Daley A love letter to Chicago. Chicago's Mayor - Richard J. Daley www.hizzonerthedaley.com

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C



half don't, and he just goes on." Several of the city's influential Italian-American fraternal organizations rushed to back Daley, not flay him. Louis Rago, a funeral director who heads the Joint Civic Committee of Italian-Americans, said: "The mayor didn't say it, and we believe him."

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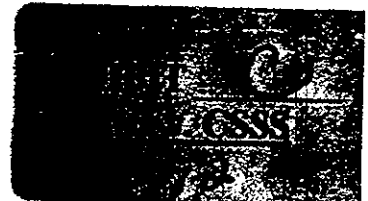
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# **EXHIBIT D**

**Cynowa, Chris (CSSS)**

---

**From:** Sepple, Lynne  
**Sent:** Thursday, January 18, 2007 7:39 AM  
**To:** Cynowa, Chris (CSSS)  
**Subject:** RE: Honest opinion needed

10 on all. 10+ on 1, 6, 7, 8, 10 - in fact 10+ on all too. You are VERY easy to work with, personable, technically competent, and detail orientated. And you the type of worker that you only have to tell you something once – and you've got it.

---

**From:** Cynowa, Chris (CSSS)  
**Sent:** Thursday, January 18, 2007 7:59 AM  
**To:** Sepple, Lynne  
**Subject:** Honest opinion needed

As one of my most frequent and most important customers, I would like to ask your honest opinion on a few things. If you would be so kind as to give me a rating from 1 to 10 (10 being the best) on the following, I would be most appreciative.

1. Professionalism:
2. Competence:
3. Technical knowledge:
4. Knowing when to escalate and doing so:
5. Resolving issues in a timely manner:
6. Personal interaction:
7. Willingness to go above and beyond to get the job done:
8. Attention to detail:
9. Following procedures:
10. Ensuring complete customer satisfaction:

Thank you for your time on this.

Chris Cynowa  
Senior Systems Engineer  
Department of Veterans Affairs  
OI&T – Enterprise Technology Management  
Hines OIFO, Building 20, Hines, IL 60141  
Office: 708-410-4042  
Cell: 630-546-1191  
E-mail: [chris.cynowa@va.gov](mailto:chris.cynowa@va.gov)

**PLAINTIFF'S  
EXHIBIT**

D

1/18/2007



# **EXHIBIT E**

DEPARTMENT OF VETERANS AFFAIRS  
VA POLICE  
UNIFORM OFFENSE REPORT  
UOR# 07-01-18-0915

Facility  
LEONARD HINES, JR HOSPITAL  
Automated VA Form 10-1393

Date/Time Printed  
JUL 06, 2007@09:57

DATE/TIME RECEIVED: JAN 18, 2007@09:15  
DATE/TIME OF OFFENSE: JAN 18, 2007@09:15  
ENDING DATE/TIME OF OFFENSE: JAN 18, 2007@10:47  
LOCATION: Bldg 20  
WEAPON USED:  
INVESTIGATING OFFICER: ADROWSKI, BOB  
METHOD OF OPERATION:

A employee requested that the police standby while another employee was terminated.

CLASSIFICATION CODE: NON-CRIMINAL/INFORMATION

\*\*\*\*\* COMPLAINANT DATA \*\*\*\*\*

COMPLAINANT NAME: KNIPPEL, GARY  
STATUS: EMPLOYEE  
HOME ADDRESS:  
HOME PHONE:  
WORK ADDRESS:  
WORK PHONE: X25804

\*\*\*\*\* COMPLAINANT DATA \*\*\*\*\*

COMPLAINANT NAME: SLATER, WILLIAM  
STATUS: EMPLOYEE  
HOME ADDRESS:  
HOME PHONE:  
WORK ADDRESS:  
WORK PHONE:

\*\*\*\*\* OFFENDER DATA \*\*\*\*\*

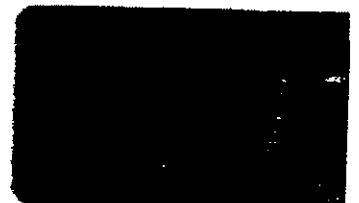
OFFENDER NAME: CYNOWA, CHRISTOPHER  
SSN: -- DOB:  
SEX: RACE:  
WEIGHT: HAIR COLOR:  
SKIN TONE: SCARS/MARKS:  
STATUS: EMPLOYEE  
DRIVER'S LICENSE & STATE:  
PERSONAL DESCRIPTION:

AGE:  
HEIGHT:  
EYE COLOR:

HOME ADDRESS:  
HOME PHONE:  
WORK ADDRESS:  
WORK PHONE:

WAS CIP WEAPON USED?  
WAS POLICE BATON USED?

PLAINTIFF'S  
EXHIBIT  
E



DEPARTMENT OF VETERANS AFFAIRS  
VA POLICE  
UNIFORM OFFENSE REPORT  
UOR# 07-01-18-0915

V Facility  
EDWARD HINES, JR HOSPITAL  
Automated VA Form 10-1393

Date/Time Printed  
JUL 06, 2007@09:57

OTHER AGENCY NOTIFIED

U.S. ATTORNEY NOTIFIED

\*\*\*\*\* NARRATIVE \*\*\*\*\*

ORIGIN:

Per Lt Unthank, I was dispatched to bldg 20 to standby during the termination of an employee.

INITIAL OBSERVATION:

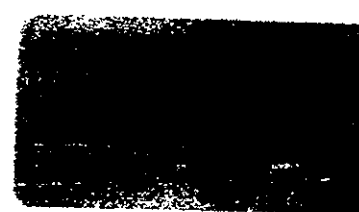
None

INVESTIGATION:

On January 18, 2007 at 0915hrs, I was dispatched to go to bldg 20 around 0950 to standby while an employee is given termination papers. I met with Mr Gary Knippel and he brought me to Mr William Slater's office.

I waited in Mr Slater's office while he was completing some phone calls. Mr Slater during this time stated "that Mr Cynowa has a temper and has had a few verbal confrontations with the staff. He also said that Mr Cynowa mentioned having an AK-47 assault rifle." Mr Slater was nervous about how Mr Cynowa would react to receiving the termination papers.

Mr Slater and myself walked to the conference room and waited for Mr Cynowa. Mr Cynowa and Mr Slatton walked in and Mr Slater handed Mr Cynowa the termination paper. He appeared to be slightly mad and suprised. He did remain under control and professional. He did ask some questions of Mr Slater and then walked to his desk. He retrieved all his belongings and then handed his badge over to Mr Slater. We then walked to his car and got his parking pass. Before entering his car, I did ask him if he had any weapons in the car. He replied "No, I don't have any weapons in the car and I'm not going to go POSTAL". We walked back upstairs to check if anything was forgotten and then he handed the parking pass over. We then walked back downstairs and he departed the facility. This was around 1047hrs.



DEPARTMENT OF VETERANS AFFAIRS  
VA POLICE  
UNIFORM OFFENSE REPORT  
UOR# 07-01-18-0915

Page 3

V Facility  
EDWARD HINES, JR HOSPITAL  
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Date/Time Printed  
JUL 06, 2007@09:57

DISPOSITION:

This investigation is closed. Mr Cynowa exited the facility without any incident occurring.

BOB ADROWSKI # 3542  
INVESTIGATING OFFICER



# **EXHIBIT F**



## Confidential Company Memo

**To:** Christopher Cynowa, Senior System Engineer  
**From:** William F. Slater, III, Program Manager  
**CC:** Anthony Statton, Senior Systems Engineer  
Scott Theobald, HR Director  
Lisa Wolford, President  
**Date:** January 18, 2007  
**Subject:** Termination of Your Employment with CSSS.NET at the VA Hines OIFO

---

Chris:

At the request of Ms. Lisa Wolford, President of CSSS.NET, your employment with CSSS.NET at the VA Hines OIFO is hereby terminated effective immediately. You are being terminated for the causes of insubordination and for being a disruptive influence in the workplace by engaging in several negative workplace behaviors. These are in violation of your Employment Agreement, and so your employment at CSSS.NET is being terminated.

You will surrender your Campus Access Pass immediately. A VA Hines Security Guard will escort you back to your desk to gather and pack any personal belongings you may have. You are now no longer authorized to access any not to access any VA computer or network resources. After you pack your personal belongings, you will quietly leave Building 20 without conversation with others, and be escorted by a Security Guard off the VA Hines facility. You are requested to not return VA Hines facility and if you have any other property that belongs to the VA it must be returned as soon as possible to Ms. Kimberly Griffin via U.S. Postal Service.

The CSSS.NET HR Director, Scott Theobald (1-402-393-8059) will contact you regarding final arrangements on our pay and your benefits.

Signed,

William F. Slater, III, PMP  
Program Manager, CSSS.NET

PLAINTIFF'S  
EXHIBIT

F

# **EXHIBIT G**

From: Slater III, William (CSSS)  
Sent: Thursday, January 18, 2007 4:45 PM  
To: Theobald, Scott; Griffin, Kimberly (OI&T)  
Cc: Mrowczynski, Ed; Wolford, Lisa; 'Carver, Larry'; 'mewell@csss.net'  
Subject: Mr. Cynowa's Cell Phone and Laptop  
Scott and Kimberly,

During his hasty exit this morning, Mr. Cynowa forgot to return his VA cell phone with its charger and possible protective case.

These are the cell phone specifics:

Model: Transport T3000  
Serial No. PZX25BIA04900026  
Phone No. 518-229-6366

I have Mr. Cynowa's laptop in my office and will provide that to whomever needs it for possible work-related analysis efforts or just for re-initialization.

I recommend the following:

- 1) Kimberly should coordinate the service termination, if possible.
- 2) Kimberly should tell us the approximate retail value of the cell phone and related equipment, if that figure is handy. If not, if she can tell us where to go.
- 3) Scott should contact and remind Mr. Cynowa to return his cell phone via mail, or else expect to have the retail value of the phone deducted from his final paycheck.
- 4) Kimberly should decide, per VA policy, what the final disposition of Mr. Cynowa's laptop and its associated docking station will be. Let's not be too hasty in wiping the laptop if there is valuable data and/or software on it. Until that time, the laptop is safely stowed in my office.

I copied Ed Mrowczynski on this in case as the Unit Security Officer, he wants to be in the loop on this.

Regards,

Bill

William F. Slater, III, PMP

Program Manager  
Department of Veterans Affairs  
OI&T - Enterprise Technology Management  
Hines OI&T, Building 20, Hines, IL 60141  
Office Phone: (708) 410-4098  
Mobile Phone: (312) 758-0307  
FAX: (708) 786-5940  
Office e-mail: william.slateriii@va.gov  
Office Hours: Monday - Friday, 8:00 AM to 5:00 PM

CSSS 0002





**From:** Slater III, William (CSSS)  
**Sent:** Thursday, January 18, 2007 11:33 AM  
**To:** Theobald, Scott; Wolford, Lisa; 'Carver, Larry'  
**Cc:** Ewell, Mac  
**Subject:** FW: Employee Exit -Chris Cynowa (1/18/07)

**Importance:** High  
FYI

---

**From:** Griffin, Kimberly (OI&T)  
**Sent:** Thursday, January 18, 2007 10:50 AM  
**To:** VHAISH Campus Management; VHAISH Hines CIOFO Desktop Support; Mrowczynski, Ed; Vogt, Kathy; Milan, Maria (NGS); Poulos, Andy; Janczy, Zygmunt  
**Cc:** VHA ETM Management; Knippel, Gary; Miller, Jason (OI&T); Slater III, William (CSSS)  
**Subject:** Employee Exit -Chris Cynowa (1/18/07)  
**Importance:** High

Good Morning! This is to notify you that Chris Cynowa (CSSS.NET Contractor) has separated service, effective January 18, 2007. Please initiate the following action(s) according to your respective area(s):

- Network Systems (disable)
- AD Account (disable)
- VPN Access (disable)
- Equipment (collect & inventory)
- ID Badge (collect & disable)
- Cell Phone Service (Deactivate account)
- Door Key (collect)
- Parking Tag (collect)
- Clearance Checklist (complete and forward to Campus Management Ofc)
- OI Training Tracker (Kimberly to archive record)
- HSITES Database (Kimberly to archive record)

Your attention is appreciated. Thank you!

Kimberly S. Griffin  
Administrative Officer  
Department of Veterans Affairs  
Enterprise Technology Management (ETM)  
Hines OIPO  
P.O. Box 7008  
Hines, IL 60141  
Ofc: (708) 410-4047  
Cell: (202) 714-8304  
Fax: (708) 786-5925

CSSS 0005



## MEMORANDUM

---

Date: January 24, 2007  
To: Scott Theobald (HR Director and Sr. Recruiter, CSSS.NET)  
From: William F. Slater, III (Program Manager, CSSS.NET)  
Subject: Notes Regarding Chris Cynowa's Termination from CSSS.NET

Greetings from the Hines VA OIFO, Scott,

Per your request, these are my recollections about Chris Cynowa's termination on January 18, 2007, as well as related events that occurred in the hours and days that followed. I need this information, but I also found it to be a bit of a therapeutic exercise. Note that I wrote it in third person to help separate the events from the resulting emotions.

Please advise if you have any questions or comments.

Thanks.

Regards,

Bill  
William F. Slater, III, PMP  
Program Manager  
Department of Veterans Affairs  
OI&T - Enterprise Technology Management  
Hines OIFO, Building 20, Hines, IL 60141  
Office Phone: (708) 410-4098  
Mobile Phone: (312) 758-0307  
FAX: (708) 786-5940  
Office e-mail: [william.slateriii@va.gov](mailto:william.slateriii@va.gov)

### Notes Regarding Chris Cynowa's Termination from CSSS.NET

---

#### Some Background:

This termination action was not "a knee-jerk reaction." It discussed at length with CSSS.NET Management and our HR department over the last two weeks due to some serious things Mr. Cynowa said and did over the last several months. It was also discussed it with Neil Piper (VA Project Manager) and Jerry Taylor (VA Project

Manager) within 30 minutes of the termination meeting's scheduled beginning. It was decided that in light of everything, that it was in the overall interest of the VA's mission at the Hines VA OIFO, as well as the Team esprit de corps, that Mr. Cynowa's immediate termination today was the most expedient course of action. And the most serious concern in the termination decision was a serious workplace safety consideration due to possible violence, and because of that, Gary Knippel made arrangements to obtain a Hines VA Security Guard, to ensure that everyone would be sufficiently guarded in case something unexpected occurred.

#### The Termination Meeting

The meeting occurred about 10:30 AM, January 18, 2007, in Room 209, Building 20, at the Hines VHA OIFO, Hines, IL. Mr. Slater entered the room and dialed up those that needed to be present.

#### Physically Present in the room were:

Rober Adrowski (VA Security Guard)  
Christopher Cynowa (Sr. System Engineer, CSSS.NET)  
William F. Slater, III (Program Manager, CSSS.NET)  
Anthony Slatton (Sr. System Engineer, CSSS.NET)

#### Present On Conference Call:

Larry Carver (VP, Business Development, CSSS.NET)  
McIntosh Ewell (Business Development Manager, CSSS.NET)  
Scott Theobald (HR Director and Sr. Recruiter, CSSS.NET)  
Lisa Wolford (President, CSSS.NET)

Once the door was closed and the meeting started, Mr. Cynowa inquired about the purpose of the meeting. Mr. Slater explained that the purpose of the meeting was to terminate Mr. Cynowa's employment with the VA and then he proceeded to read the first paragraph from the termination letter he had prepared. That letter is shown below:

To: Christopher Cynowa, Senior System Engineer  
From: William F. Slater, III, Program Manager  
CC: Anthony Slatton, Senior Systems Engineer  
Scott Theobald, HR Director  
Lisa Wolford, President  
Date: January 18, 2007  
Subject: Termination of Your Employment with CSSS.NET at the VA Hines OIFO  
Chris:

At the request of Ms. Lisa Wolford, President of CSSS.NET, your employment with CSSS.NET at the VA Hines OIFO is hereby terminated effective immediately. You are being terminated for the causes of insubordination and for being a disruptive influence in the workplace by engaging in several negative workplace behaviors. These are in violation of your Employment Agreement, and so your employment at CSSS.NET is being terminated.

then returned to the building and his old cubicle with the security guard once more to look to make sure he didn't leave anything. Later, he was finally escorted again to his car by the Mr. Adrowski, the Security Guard. The Security Guard returned to the executive offices in Building 20, where Mr. Slater was in discussion with Ms. Kimberly Griffin, and reported that Mr. Cynowa had departed the premises.

#### Related Events

Mr. Slater returned Mr. Cynowa's badge to Ms. Kimberly Griffin, and based on a request from Ms. Griffin, wrote a termination report for the VA Management. Ms. Griffin sent out a form e-mail to the people involved in security, so Mr. Cynowa's computer access account would be removed from the system. Mr. Slater completed his write-up on the termination action and e-mailed that report to VA management, copying CSSS.NET management that afternoon on the same day.

During the afternoon of January 18, 2007, several co-workers were curious about Mr. Cynowa's termination. Mr. Slater was approached by several of these co-workers to briefly and professionally discuss it. Though everyone felt bad that it happened, no one expressed surprise and the general consensus was that Mr. Cynowa had brought this action on himself with bad behavior in the workplace. In fact, a few employees mused openly that they didn't think it was a matter of "IF" but rather a matter of "WHEN" Mr. Cynowa would be gone. They all recognized that the things Mr. Cynowa had said about his company and the president of his company were all very unprofessional.

Later in the afternoon on January 18, 2007, Mr. Slater spoke privately with Mr. Mike Cronin, who is a well-respected Senior Exchange Systems Engineer from NGS. He said he was sad about Mr. Cynowa's sudden termination, but he confided that Mr. Cynowa had been verbally abusive to him as well. When Mr. Slater inquired further for an actual example, Mr. Cronin revealed the following: "Each morning, when Chris would first see me he would first address me as, 'Cunt!'" Mr. Slater said that was horrible and that he wished he had known this earlier, because he would have taken action.example,

On Thursday afternoon, January 18, 2007, Mr. Slater contacted Ed Mrowcynski (VA IT Security Officer) regarding Mr. Cynowa's termination. On Friday morning, January 19, 2007, Mr. Dave Lindgren (VA PC Technician) came by to get Mr. Cynowa's VA-assigned laptop.

On January 18, 2007 a request was placed to shut off the VA cellular phone that Mr. Cynowa still had in his possession. From January 22 to January 24, 2007, work has been done to determine the value of the phone in case it is not returned to the VA.

On January 19, 2007 about 9:45 AM, Mr. Slater was contacted by Mr. Jerry Taylor, VA Project Manager, and was requested to draft a written communication to do "damage control," so that the staff would have their morale impacted too negatively as a result of this termination. Mr. Taylor stated that he did not want a lot of turnover to result from

Mr. Cynowa's termination. Mr. Slater wrote a two-page memo and distributed it in the afternoon on January 19, 2007.

Between January 19 and January 23, 2007, for his own personal safety, and his family's safety, Mr. Slater considered having a restraining order drawn up against Mr. Cynowa, based on the intensity of the threat he received as Mr. Cynowa was being terminated, however, he has since reconsidered this course of action.

On January 22, 2007, Mr. Slater was asked to create this report, recounting his recollections of this event and its related activities. On January 24, 2007, Mr. Slater completed this report for Mr. Theobald's records.

Date: February 9, 2007

To: Mr. Scott Theobald (HR Director and Sr. Recruiter, CSSS.NET)

From: Mr. William F. Slater, III (Program Manager, CSSS.NET)

CC: Ms. Lisa Wolford, President of CSSS.NET  
Mr. Lawrence Carver, VP of CSSS.NET Business Development  
Mr. McIntosh Ewell, Manager of CSSS.NET Business Development  
Mr. Anthony Slatton, Senior Systems Engineer, CSSS.NET

Subject: Notes Regarding Chris Cynowa's Insubordination while employed by  
CSSS.NET

Greetings from the Hines VA OIFO, Scott,

Per your request, these are my detailed recollections about Chris Cynowa's insubordinate behavior that led to his termination from CSSS.NET on January 18, 2007. Specifically, this memo details a serious discussion that Mr. Anthony Slatton and I had with Mr. Cynowa on January 10, 2007.

Please advise if you have any questions or comments.

Thanks.

Regards,

Bill  
William F. Slater, III, PMP  
Program Manager  
Department of Veterans Affairs  
OI&T - Enterprise Technology Management  
Hines OIFO, Building 20, Hines, IL 60141  
Office Phone: (708) 410-4098  
Mobile Phone: (312) 758-0307  
FAX: (708) 786-5940  
Office e-mail: [william.slateriii@va.gov](mailto:william.slateriii@va.gov)

## Notes Regarding Chris Cynowa's Subordination while Working at CSSS.NET

---

### Background:

During my brief tenure at the Hines VA OIFO in Hines, IL as the new Program Manager on the EMS contract, I had numerous public and private conversations with Mr. Chris Cynowa. There was always a recurring theme of negativity, especially where CSSS.NET and Lisa Wolford, the CSSS.NET President and Founder are concerned. Disrespectful and negative remarks were made, sometimes multiple times, regarding the following:

- Limitations of 3% on pay raises, per Larry McKeehan
- The Holiday Party Policies regarding alcoholic beverages
- The Holiday Party alcoholic beverage consumption by the CSSS.NET employee from the Railroad Retirement Board who didn't get the word about the Holiday Party Policies.
- The \$10-off, Build-A-Bear coupon he received as a gift at the Holiday Party (this was mentioned in a very tacky way by Dan McDonald in his complaint e-mails to you and Lisa, when he resigned. In fact he even did something tasteless and brought in a Quinoas sandwich coupon for a free sandwich to be given to Ms. Lisa Wolford, in order to mock the coupon she gave him at the Holiday Party.
- The new requirement for Diversity Training because of his off-color remarks at the Holiday Party.
- How he despised Lisa Wolford and didn't respect her or her abilities as a manager and as the President of CSSS.NET.
- Being asked to remove this tag line from his e-mail signature block:
  - "Of all the things I've lost, I miss my mind the most."
- An open opportunity to provide Performance Review Input for his own performance.

Recognizing the detrimental effects on coworkers in the VA workplace, as well as the potential for negative impacts with CSSS.NET's reputation, this repeated negativity led me and Anthony Slatton to initiate a meeting with Mr. Cynowa to discuss his negative workplace behavior.

## The Meeting

On Wednesday afternoon, January 10, 2007 between 1:45 PM and 2:45 PM, Anthony Slatton and myself sat down with Mr. Chris Cynowa in my office at the Hines VA OIFO in Hines, IL, to discuss his repeated displays of bad attitude and snide remarks regarding CSSS.NET, which our employer, and Ms. Lisa Wolford. Our purpose was to admonish you about the inappropriateness of this behavior, to discuss it at length, and to inform you that this negative workplace behavior needs to cease and desist immediately.

During this meeting I started by telling Mr. Cynowa the following:

1. This verbal discussion was an attempt to help him and help us, so we would be able to help him correct his negative behaviors we had been seeing in the workplace, and that we hoped we could accomplish this before his negative behaviors led to the required implementation of a Performance Improvement Plan.
2. I specifically emphasized that my purpose was to help him change your behavior, but not your personality or character.
3. I explained that it was reported to me that during the early hours when he comes into the office, he was reported to have been seen reading novels and other non-work related printed material that is totally unrelated to your job. I explained that this behavior, if actually occurring, was seen as unfavorable to CSSS.NET as well as himself. I asked for it to stop immediately if that is the case.
4. I explained that effective immediately, he needed to cease in making negative and sarcastic remarks about CSSS.NET and especially our President, Ms. Lisa Wolford. In fact, I called it "Boss Bashing", and told him that Lisa was aware of it and that it must stop.
5. I also explained that these negative and sarcastic remarks were seen by myself, CSSS.NET management and others as a disruptive, negative influence in the workplace here at the Hines VA OIFO in Hines, IL.
6. I also cautioned him that his reputation was one of his most important assets, and that his ability to have an employer value him and his work, and then pay him for it on a regular basis is like "a sacred trust" that he needed to be thankful for.

These points were further discussed and elaborated upon by Anthony Slatton.



## The Response

Mr. Cynowa's response, especially in its intensity and negativity, was an unfortunate and an unexpected surprise to us. In a heated, upset, defiant tone, he explained the following:

1. That when he arrives in the morning, he was not on the clock for an hour, so he had time to engage reading novels and other non-work related printed material that is totally unrelated to your job.
2. That he still felt like Lisa Wolford was a jerk and a fool, who didn't care about her employees.
3. That just like the jester in a King's Court, no one had to point out that Lisa was the fool in all this.
4. That he was not worried because Lisa needs him more than he needs her, and that she was driving the company into the ground.
5. That he didn't blame me, because the *shit* flows down hill, starting with Lisa and that her CSSS.NET consultants were the ones at the bottom that had to catch the *shit*.
6. In the past, he had always gotten away with this behavior because the former Program Manager, Larry McKeehan also engaged in this behavior, and that this negative behavior with putting down CSSS.NET and Lisa were considered to be "normal behavior."
7. That he felt sorry for me because I was a good guy, but that I didn't have a chance because Larry McKeehan "got screwed," and so would I.
8. That he weren't worried about leaving CSSS.NET or the VA, and that if he needed to get another job, he wouldn't be worried about getting a negative reference because he would rely on others who would give him good references.

Nevertheless, on January 10, 2007, we gave him a chance to hear our concerns, take it to heart, do some introspection, and in a sincere act of contrition, correct his negative workplace behaviors, for your own benefit, for the benefit of CSSS.NET and the workplace there at Hines VA OIFO in Hines, IL. In our opinion, with Mr. Cynowa's defiant reactions during this meeting, he squandered that chance.

## The Management Response

So, after some careful review and consideration between me, Anthony, CSSS.NET's Scott Theobald, and CSSS.NET's President, Ms. Lisa Wolford, we decided that we regarded Mr. Cynowa's reactions to our admonitions and discussion on January 10, 2007 to be defiant, audacious, belligerent, insubordinate and uncalled for. In fact, the insubordination we witnessed while trying to verbally admonish him about his negative workplace behaviors is, in itself, also forbidden by another CSSS.NET Policy, regarding employee workplace behavior and insubordination:

Indeed, it was determined that due to the open negativity and hostility we witnessed during this January 10, 2007 meeting led us to believe that a more substantive, measurable solution was required at this point in time. Therefore, when, after careful deliberation, the senior management of CSSS.NET elected to terminate Mr. Cynowa's employment, I was not surprised, and I did what I needed to do as his supervisor, which was to make the arrangements with the VA, Hines Security, and to write the termination notification letter. After all the coordination with the VA, CSSS.NET senior management, and the CSSS.NET HR Director, I arranged the termination meeting with Mr. Anthony Slatton and Mr. Cynowa on January 18, 2007, and he was terminated from CSSS.NET at that time. A separate report I have written covers the events of that meeting, as well as the events that occurred in the days that followed.

I would like to also state that this was a very unpleasant experience for me as well. If there had been anything I could have personally done as his supervisor to help change Mr. Cynowa's repeated negative behaviors here at the VA so that he could have remain employed here, I would have done it. But I would also like to report that three weeks after Mr. Cynowa's departure, the end result is that the workplace here at the VA is a better, more positive, more productive environment without his negative, disruptive behavior. So I believe that the outcome of this difficult, unpleasant action turned out to have the positive results intended by the leadership of CSSS.NET when the decision was made to terminate Mr. Cynowa's employment for insubordination and negative workplace behaviors.

If there are any questions or comments, please feel free to contact me for a clarification.

Regards,

William F. Slater, III, PMP  
Program Manager, CSSS.NET

# **EXHIBIT H**

From: "Randy Padal" <ripadal@hotmail.com>

To: ccynowa@yahoo.com

Subject: Job Reference for Hines

Date: Thu, 18 Jan 2007 13:23:49 -0600

Chris,

Nobody really knows 100% what happened but rest assured that your coworkers will miss you here at Hines.

I personally appreciated the hard work you did during the migrations. Not many men would work 84 hour weeks for 3 weeks straight and offer not to take a day off at Thanksgiving too. I could always depend upon you to get something done when I needed it done.

I am certain you will use Larry as a reference for your time here at Hines. Feel free to also list me as a reference as you will always get a good one from me. I also noted to Mr. George Jackson that you were available for hire if he had any contracts needing a dedicated hard working Systems Engineer.

Take care of yourself and your family,

Randy Padal  
819 Erie Drive  
Romeoville, IL 60446  
ripadal@hotmail.com  
Cell 815-685-6158

**EXHIBIT** 8  
**Cynowa v. CSSS**

**PLAINTIFF'S  
EXHIBIT**  
H

LAW OFFICE OF THERESA V. JOHNSON  
FEB 07 2007  
BY: JVJ  
**R E C E I V E D**

# **EXHIBIT I**

DEPARTMENT OF EMPLOYMENT SECURITY  
30 DUPAGE COURT  
ELGIN, IL 60120

DATE: 01-23-2007 SSN: 356-64-8091

CHRISTOPHER S CYNOWA  
2043 LEeward LN  
HANOVER PARK, IL 60133

NOTICE OF LOCAL OFFICE INTERVIEW  
IMPORTANTE NOTICIA DE UNA ENTREVISTA EN LA OFICINA LOCAL

A question has been raised regarding your eligibility for unemployment insurance benefits for the period beginning 01-21-2007. To resolve this question, it will be necessary for you to be interviewed and to supply information regarding your discharge for misconduct connected with work. Section 602A of the Illinois Unemployment Insurance Act applies to your eligibility in this case. This interview is requested because YOU WERE TERMINATED FROM CLIENT SERVER SOFTWARE SOLUTIONS INC. WE WILL CALL YOU ON THE DATE SHOWN BELOW. At the time of your interview, you should be prepared to present any information you have regarding your case.

YOU HAVE BEEN SCHEDULED TO BE INTERVIEWED BY TELEPHONE ON: 02-05-2007 at 10 00 AM. We will telephone you at this time or within ten minutes after this time at 6305461191, the contact telephone number which you provided to us. If this number is incorrect, contact the Claims Adjudicator whose name and phone number appear at the bottom of this letter and correct the number. If a questionnaire is enclosed with this Notice, please complete it and be prepared to answer the questions when we call. If you have witnesses who can provide information helpful to your case, you should have them available when we telephone you.

If you wish to be interviewed in person rather than by telephone, CONTACT THE ILLINOIS DEPARTMENT OF EMPLOYMENT SECURITY AT THE TELEPHONE NUMBER LISTED BELOW.

This notice is for your protection and is not a denial of benefits. A final determination regarding your eligibility for benefits will not be made until after you have had an opportunity to discuss this matter with our office. Failure to make yourself available at the time stated above will result in a determination being made on the basis of information then available to the Claims Adjudicator. YOUR BENEFITS MAY BE SUSPENDED, TERMINATED OR RECOUPED.

IF YOU EXPECT TO BE WORKING, OR FOR ANY OTHER GOOD REASON, YOU WILL NOT BE AVAILABLE FOR THE INTERVIEW, COMPLETE THE ENCLOSED FORM AND MAIL IT TO THIS OFFICE TO RESCHEDULE YOUR INTERVIEW.

Esta noticia es para avisarle que hay una duda sobre su elegibilidad para seguro de desempleo. Para aclarar esta duda usted puede hablar por telefono a la hora y el dia antes mencionados o presentarse a esta oficina para una entrevista en la fecha y la hora indicada. Faltar a entrevistarse por telefono o en persona resultara en una determinacion basada en la informacion al corriente y puede afectar sus beneficios de desempleo. Sus beneficios pueden ser suspendidos, terminados o devueltos en base lo indicado arriba. Si Ud. esta trabajando en la fecha y la hora indicada, complete esta trajeta y enviela por correo a la oficina tan pronto le sea posible.

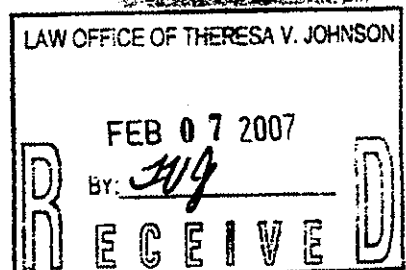
- 150

ES Service Representative  
Phone 847-888-7900 Ext.

Fax 847-888-5547

FORM NBR: Bis-307AR  
MIS REF NBR: 00934

(304)



H

# **EXHIBIT J**

DEPARTMENT OF VETERANS AFFAIRS  
VA POLICE  
UNIFORM OFFENSE REPORT  
UOR# 07-01-18-0915

Date/Time Printed  
JAN 31, 2007@10:53

Facility  
EDWARD HINES, JR HOSPITAL  
Automated VA Form 10-1393

DATE/TIME RECEIVED: JAN 18, 2007@09:15  
DATE/TIME OF OFFENSE: JAN 18, 2007@09:15  
ENDING DATE/TIME OF OFFENSE: JAN 18, 2007@10:47  
LOCATION: Bldg 20  
WEAPON USED:

INVESTIGATING OFFICER: ADROWSKI, BOB  
METHOD OF OPERATION:

A employee requested that the police standby while another employee was terminated.

CLASSIFICATION CODE: NON-CRIMINAL/INFORMATION

\*\*\*\*\* COMPLAINANT DATA \*\*\*\*\*

COMPLAINANT NAME: [REDACTED]  
STATUS: EMPLOYEE  
HOME ADDRESS:  
HOME PHONE:  
WORK ADDRESS:  
WORK PHONE: X25804

\*\*\*\*\* COMPLAINANT DATA \*\*\*\*\*

COMPLAINANT NAME: [REDACTED]  
STATUS: EMPLOYEE  
HOME ADDRESS:  
HOME PHONE:  
WORK ADDRESS:  
WORK PHONE:

\*\*\*\*\* OFFENDER DATA \*\*\*\*\*

OFFENDER NAME: [REDACTED]  
SSN: --  
SEX:  
WEIGHT:  
SKIN TONE:  
STATUS: EMPLOYEE  
DRIVER'S LICENSE & STATE:  
PERSONAL DESCRIPTION:

DOB:  
RACE:  
HAIR COLOR:  
SCARS/MARKS:  
AGE:  
HEIGHT:  
EYE COLOR:

HOME ADDRESS:  
HOME PHONE:  
WORK ADDRESS:  
WORK PHONE:

WAS CIP WEAPON USED?  
WAS POLICE BATON USED?

PLAINTIFF'S  
EXHIBIT  
J





DEPARTMENT OF VETERANS AFFAIRS  
VA POLICE  
UNIFORM OFFENSE REPORT  
UOR# 07-01-18-0915

Facility  
EDWARD HINES, JR HOSPITAL  
Automated VA Form 10-1393

Date/Time Printed  
JAN 31, 2007@10:53

OTHER AGENCY NOTIFIED

U.S. ATTORNEY NOTIFIED

\*\*\*\*\* NARRATIVE \*\*\*\*\*

ORIGIN:

Per [REDACTED], I was dispatched to bldg 20 to standby during the termination of an employee.

INITIAL OBSERVATION:

None

INVESTIGATION:

On January 18, 2007 at 0915hrs, I was dispatched to go to bldg 20 around 50 to standby while an employee is given termination papers. I met with Mr [REDACTED] and he brought me to Mr [REDACTED] office.

I waited in Mr [REDACTED] office while he was completing some phone calls. Mr [REDACTED] during this time stated "that [REDACTED] has a temper and has had a few verbal confrontations with the staff. He also said that Mr [REDACTED] mentioned having an AK-47 assault rifle." Mr [REDACTED] was nervous about how Mr [REDACTED] would react to receiving the termination papers.

Mr [REDACTED] and myself walked to the conference room and waited for Mr [REDACTED]. Mr [REDACTED] and Mr [REDACTED] walked in and Mr [REDACTED] handed Mr [REDACTED] the termination paper. He appeared to be slightly mad and suprised. He did remain under control and professional. He did ask some questions of Mr [REDACTED] and then walked to his desk. He retrieved all his belongings and then handed his badge over to Mr [REDACTED]. We then walked to his car and got his parking pass. Before entering his car, I did ask him if he had any weapons in the car. He replied "No, I don't have any weapons in the car and I'm not going to go POSTAL". We walked back upstairs to check if anything was forgotten and then he handed the parking pass over. We then walked back downstairs and he departed the facility. This was around 1047hrs.



# **EXHIBIT K**

LYNDIA CHRISTOPHER  
 07/02/58 M  
 ADCT# 9129919  
 SSN

Patient Name  
 Chief Complaint  
*Siberus depression*

DOB *7/2/58* Time In: *PCU* Date: **FEB 18 2007**  
 Allergies  
 T *76* P *76* BP *140/90* BP2.  
 R *22* Wt *222.0* HR *71*

Location:  
 Onset:  
 Timing (Worse when..., Better when...)  
 List related symptoms:  
 How severe - on a scale of 1-10? \_\_\_\_\_  
 Additional Description  
 Was this the result of an injury?  no  yes  
 If yes, was injury work-related?  no  yes  
 Describe:

Const	
Neuro	
ENT	
Eyes	
Skin	
Musc	
Cardio	
Resp	
GI	
GU	
Endo	
Psych	
Heme	
Altry	

For ROS, check Normal if no complaints, or add comment if abnormal. If area was not addressed, leave blank.

History Narrative:  
*Re depression.*  
*Was fired from job*  
*months ago*

Medical Problems:  
 See History Form

Medications (prescribed, OTC, Supplements, etc.)  
 See History Form

Past Surgeries (list type of surgery and date)  
 See History Form

Family History: Diseases occurring before age 65  
 See History Form  
 Father  none  
 Mother  none

Pregnant?  Yes  No  Unsure  N/A Last Menses: / /  
 Nursing?  Yes  No  N/A  
 Tobacco  none  PPD  Pack Years  N/A  
 Alcohol  none  Drinks per Day  N/A

PLAINTIFF'S  
 EXHIBIT  
**K**

EXHIBIT **33** p. 1 of 3  
 Cynowa v. CSSS et al - Response to MTD

Patient Name / Label

Exam Narrative / Abnormal Findings:

Pt. very depressed and appears not recent events. states he was accused of driving AK47 and having it in the back seat of his car. Pt. states he does not even own a gun.

DOB

CONV

EYE

R

L

ENT

R

L

NECK

RESP

CARD

LYMPH

CHEST

ABD

GEN

GU

MISC

NEUR

PSYC

- 2 Vials (above)
- General Appearance
- Conjunctivae & Lids
- Pupils & IOP
- Extraocular Muscles, etc.
- Visual - eyes & nose
- Oral and nasal, Cerebellum / TM
- Thyroid examination
- Heart: Mucosa, apical, S1, S2
- Lungs, Trachea, Gurgles
- Diaphragm (heaves, crackles)
- Abdomen: epigastric, umbilical
- Rectal: guaiac, occult blood
- Genitalia: testis, prostate
- Extremities: strength, sensation, reflexes
- Neurological: cranial nerves, cerebellum, deep tendon reflexes
- Behavior: affect, thought, insight
- Speech: fluency, content
- Orientation: person, place, time
- Mood & affect
- Judgment / insight

Today's Lab Results (UA, Rapid Strep, etc.)

Assessment / Plan

311 / 300.00

200pts sample CD  
see me in 1 month  
Summer plan JW

Discharge Instructions / Follow-Up:

Patient / Parent expressed understanding and agreement with plan  
Return to clinic 2-6 days if new or worsening symptoms  
Patient advised to use back-up contraceptive with an alternate  
Other (specify)

DATE	TIME	STATUS	REASON	REMARKS	DATE	TIME	STATUS	REASON	REMARKS

NURSE VISIT

CVT - location, duration, quality, severity, timing, current, modifying factors, associated symptoms  
 DDG - Constitutional, Eyes, ENT, Cardio, Resp, Musculoskeletal, GI, GU, Psych, Skin, Neuro.  
 Allergy/Immune, Endocrine, Hemat/Lymph  
 PAST - Past Family Social - medication, allergies, medical, surgical, occupation, tobacco, alcohol  
 If cancelling this continuation of care > 30% of visit, list last face-to-face time and subsequent contact.

I certify that I have reviewed all of the data on all pages of this form.

Provider: JW

Date: 2-12-07

LEGAL ILLICIT  
MICHAEL VORSEY, D.D.  
MICHAEL VORSEY, D.D.

LEGAL ILLICIT  
MICHAEL VORSEY, D.D.  
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LEGAL ILLICIT  
MICHAEL VORSEY, D.D.  
MICHAEL VORSEY, D.D.

EXHIBIT 3.3  
Cynowa v. CSSS  
page 3 of 3

Confidential Patient Information

Prescription Period  
 01/01/2007 through 07/08/2008

Patient Info: CHRISTOPHER CYROWA  
 2643 LAWRENCE LN  
 HANOVER PARK, IL 60133

Store Info: 2040 ARMY TRAIL RD  
 HANOVER PARK, IL 60133  
 (630)830-8558

Patient Phone: (630)837-9036  
 Date of Birth: 07/02/1968  
 Gender: M  
 Allergy Conditions:  
 Health Conditions: None on file

Prescription Number	Medication	NDC	RPh	Prescriber	Ins. Plan(s) Claim Ref(s)	Date of Service	Quantity	Price
0080933-09638	SERTRALINE 50MG TABLETS You saved \$17.00 by using the generic	59762-4900-05	WVY VALKUTIS, J.		CASH /	02/13/07	30.000	77.99
0080933-09638	SERTRALINE 50MG TABLETS You saved \$17.00 by using the generic	59762-4900-05	WVY VALKUTIS, J.		CASH /	03/14/07	30.000	77.99
0080933-09638	SERTRALINE 50MG TABLETS You saved \$17.00 by using the generic	59762-4900-05	JED VALKUTIS, J.		CASH /	04/21/07	30.000	72.99

Total Fillings: 3 Subtotal: 30.000 228.97

CASH / 02/21/08 20.000 13.39

Total Fillings: 1 Subtotal: 20.000 13.39

1727045-09638 MICROCRONE/BRP 3MG/500MG TABS 00891-0349-05

You saved \$24.00 by using the generic

**PLAINTIFF'S EXHIBIT**

**EXHIBIT**  
 Cyrowa v. BSS et al. - Response to BMD