



## PRIVACY ACT STATEMENT

(This form is covered by the Privacy Act of 1974, Public Law 93-579: Authority for requesting the personal data and the uses are given below.)

1. FORM NUMBER/TITLE/DATE. EEOC Form 5, CHARGE OF DISCRIMINATION, March 1984.
2. AUTHORITY. 42 U.S.C. § 2000e-5(b), 29 U.S.C. § 211, 29 U.S.C. § 626.
3. PRINCIPAL PURPOSE (S). The purpose of the charge, whether recorded initially on this form or in some other way reduced to writing and later recorded on this form, is to invoke the jurisdiction of the Commission.
4. ROUTINE USES. This form is used to determine the existence of facts which fall within the Commission's jurisdiction to investigate, determine, conciliate and litigate charges of unlawful employment practice. Information provided on this form will be used by Commission employees to guide the Commission's investigatory activities. This form may be disclosed to other State, local and federal agencies as may be appropriate or necessary to carrying out the Commission's functions. A copy of this charge will ordinarily be served upon the person against whom the charge is made.
5. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL FOR NOT PROVIDING INFORMATION. Charges must be in writing and should identify the parties and action or policy complained of. Failure to have a charge which identifies the parties in writing may result in the Commission not accepting the charge. Charges under Title VII must be sworn to or affirmed. Charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to provide the requested information.
6.  Under Section 706 of Title VII of the Civil Rights Act of 1964, as amended, this charge will be deferred to and will be processed by the State or local agency indicated. Upon completion of the agency's processing, you will be notified of its final resolution in your case. If you wish EEOC to give Substantial Weight Review to the agency's findings, you must send us a request to do so, in writing, within fifteen (15) days of your receipt of the agency's finding. Otherwise, we will adopt the agency's finding as EEOC's and close your case.

## NOTICE OF NON-RETALIATION REQUIREMENTS

Section 704(a) of the Civil Rights Act of 1964, as amended, and Section 4(d) of the Age Discrimination in Employment Act of 1967, as amended, state:

It shall be an unlawful employment practice for an employer to discriminate against any of his employees or applicants for employment, for an employment agency to discriminate against any individual, or for a labor organization to discriminate against any member thereof or applicant for membership, because he has opposed a practice made an unlawful employment practice by this title or because he has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this title.

The Equal Pay Act of 1963 contains similar provisions. Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made.

## ATTACHMENT A to Jacqueline Dost's EEOC Charge of Discrimination

1. My name is Jacqueline Dost (female), and I am currently employed by the Carroll County Board of Commissioners (the "CCBC").
2. I have worked for Carroll County since July 2021 and began as the Manager of Solid Waste for the CCBC. In early 2022, I became Director of Solid Waste.
3. Current CCBC Chairman Michelle Morgan is the first ever female Chairman of CCBC.
4. All six CCBC Commissioners are men.
5. District 5 Commissioner Ernest ("Ernie") Reynolds has a problem with women, specifically women in positions of power. Many women and other men have also noticed that Mr. Reynolds has a problem with women being in charge.
6. Every County employee received a raise this past fiscal year, in July 2022, and some department heads, including myself, received higher raises at that time. I received a raise because I became a Director and received additional responsibilities.
7. At a June 13 CCBC meeting, Mr. Reynolds publicly called out the fact that I, along with Communications Director Ashley Hulsey (female) and another woman, received an additional raise above that received by all County employees.
8. He stated that it wasn't fair, that we took away money from the other 600-plus County employees, that it was a "waste," and that he did not understand why we received higher raises. He falsely claimed we did not take on additional responsibilities justifying the raises. I became a Director and took on more responsibilities when I received the raise.
9. He called the raises "inequity in salary increases" and "favoritism," which he blamed on the (female) Chairman. He indicated that we were given money that was not earned.
10. He then made similar comments at CCBC meetings, in the local newspaper, and on the Community Voice on the WLBB radio station.
11. However, he did not say anything about the three male department heads who also received higher raises.
12. He also did not ask about the salary budgets for constitutional officers but only targeted the female Chairman and female employees in her office for criticism. Mr. Reynolds and some of the other male Commissioners try to undermine the Chairman and take control away from her because she is a powerful woman.
13. His comments were also strange because the raises were implemented during the prior fiscal year, not as part of the budget being actively discussed at the time. My raise was implemented in the previous year but was referred to as if it was occurring in July 2023.
14. My colleague, Ms. Hulsey, approached Mr. Reynolds and asked him why he thinks we are not worth the money we are making and why he did not call out the men who received more money, and he simply said, "That's different." He did not explain why male department heads receiving raises is "different."
15. Because of Mr. Reynolds' false and biased narrative, we have been ostracized, glared at, and whispered about by the other County employees, who now believe we are the only

- employees that received higher raises. I have noticed a significant change in my coworkers' attitudes toward me.
16. Chairman Morgan ordered jackets featuring the County logo for the Commissioners, Department heads, and other employees to wear on official occasions. In response to this, Mr. Reynolds derogatorily referred to the CCBC as a college "sorority."
  17. In response to an email about the logo jackets, Mr. Reynolds said, "you can put lipstick on a pig, but it's still a pig."
  18. The County has two County attorneys, one male and one female, but Mr. Reynolds will only communicate with the male attorney on a regular basis.
  19. Mr. Reynolds berates and harshly, unfairly criticizes female CCBC employees, including in public CCBC meetings and in emails which include constituents.
  20. Mr. Reynolds publicly blames, criticizes, and undermines Chairman Morgan (female), implying she is not competent. For example, he notified constituents via email that he was required to go through Chairman Morgan regarding issues with public roads, stating "this is not the way I want things to happen and it is not best for our constituents – but it is what the Chairman now requires."
  21. He also sends extremely condescending and belittling internal emails to Chairman Morgan, to the County Clerk Lynda Bingham, to Ms. Hulseley, and to me, but not to men.
  22. I have been afraid to ask for needed equipment for my department because I fear being interrogated and unfairly scrutinized by him because I am a woman trying to do my job.
  23. My Solid Waste department has to use old equipment, while Public Works, which has a male director, gets new equipment.
  24. In late 2022, a twenty-year-old piece of equipment belonging to Public Works caught fire and needed to be replaced. When Public Works appeared before the CCBC to ask to replace the piece of equipment, Mr. Reynolds put all of the blame on Solid Waste.
  25. When E-911 Director Felicia Rowland (female) requested one vehicle for her department, Mr. Reynolds condescendingly questioned her despite that funds for the vehicle were available.
  26. In contrast, Community Development Director Ben Skipper (male) faced no resistance when he requested a vehicle for his department.
  27. In March 2021, the Public Works Director (male) faced no resistance when he requested a dump truck for his department, after two trucks were wrecked.
  28. In November 2022, the Public Works Director asked for \$1.3 million to purchase vehicles and faced no resistance. Mr. Reynolds did not ask any questions.
  29. Mr. Reynolds has criticized and belittled Animal Shelter Director Christy Owens (female), publicly and in emails.
  30. Mr. Reynolds has criticized and belittled Carroll County constituent and business owner Becky Preston (female), sending her condescending emails.
  31. In contrast, he often praises male employees and Commissioners.

32. In August 2023, Mr. Reynolds praised a male colleague and his department at a public meeting for all of their hard work on a project, even though my colleague Ashley Hulsey (female) was the head coordinator for the project.
33. On September 28, 2023, I appeared before the CCBC regarding a request to replace a piece of equipment for my department.
34. My written request made it clear that I had held off on asking for this needed equipment because I feared being unfairly subjected to a grueling inquisition, because of the turmoil within CCBC during the budget process, and because of my health. I had conferred with the Chairman about holding off.
35. Nevertheless, when I appeared before the CCBC regarding the request, Mr. Reynolds took the opportunity to berate me and the Chairman for making the request after the budget process concluded.
36. One Commissioner brought up the Public Works equipment that had caught fire and again wrongly placed the blame on Solid Waste, asking if the equipment I needed to replace was the same one that caught fire.
37. Though they and the CCBC agreed that my department needed the equipment, Mr. Reynolds and another male Commissioner took the opportunity to attack me, question my competence and integrity, and retaliate against me.
38. Ms. Hulsey and I have each filed internal grievances regarding Mr. Reynolds' treatment of us and of our female colleagues.
39. Since I spoke up about the gender disparities, my colleagues have retaliatorily ostracized me, isolated me, and cast me out.
40. I believe that Mr. Reynolds wants to get rid of me and have my employment terminated. There has been discussion of eliminating my position and Ms. Hulsey's from the budget.
41. CCBC has done nothing to prevent or correct the gender discrimination and retaliation to which Mr. Reynolds and other men at CCBC have subjected us.
42. The gender discrimination and retaliation have robbed me of my confidence and enthusiasm in performing my job. The experience has been extremely distressing.
43. Particularly because I am a woman in a male-dominated industry and my office is in Public Works, where many men work, this has created a very uncomfortable work environment for me.
44. Because of District 5 Commissioner Ernest Reynolds' and other male Commissioners' discriminatory and retaliatory treatment of me, the Carroll County Board of Commissioners has subjected me to (1) discrimination and (2) a hostile work environment based on my gender (female), (3) retaliation, and (4) a retaliatory hostile work environment, all in violation of Title VII of the Civil Rights Act of 1964, as amended.