

# EXHIBIT A

STATE OF MINNESOTA	FILED PSL	DISTRICT COURT
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		Court File Number 27CV13-10188
	BY HENN CO. DISTRICT COURT ADMINISTRATION	Case Type

Gregoire Nleme,  
922 Wescott Trail, Apt 104  
Eagan, MN 55123

**Complaint**

Plaintif(s)

Vs.

Ford Motor Company  
1 American Rd  
Dearborn, MI 48126

Defendant(s)

PLAINTIFF, as and for its cause of action against the above-named defendant states and alleges follows

- 1) Defamation: Ford Motor Company has been providing damaging information about me to potential employers: Harassment of women in particular. It o I went to Honeywell in March of 2010 to follow-up on an application. I asked the receptionist to call Human Resources. It occurred to me that a security guard at Honeywell in Golden Valley, Minnesota went to the receptionist immediately after I spoke to her, asking her if she was all right. He then explained to her that asked her the question because he (referring to me) was harassing women at Ford.
- 2) Defamation. My termination from Ford on June 30, 2008 was communicated to the public. When I went many times at Walmart, Walmart's employees would talk about. They would claim that I promised to go back to Ford and that I wanted to date all the women there. Every time I heard those stories, I felt humiliated. Those incidents happened many time at the Walmart store on Duckwood Drive in Eagan, Minnesota and at the Walmart store located in Inver Grove Heights, Minnesota. At one point sometime in December 2012 at the Inver Grove Heights's store, I had to react and speak directly to the employees. I asked them if the store manager was there because I wanted to talk to the store manager. But the store manager was not there. I promised to go back to see the sore manager but I never went back.

- 3) Defamation and intimidation: Twice, when I was delivering newspapers (the Pioneer Press) from February 2010 to September 2010, As I was either purchasing newspapers at the gas station located at the corner of Pilot Knob Road and Diffley Road, the police also went to ask the cashier ( only when the cashier was a women) if she was alright. I went to Dakota County Sheriff asking them whether or not I had an investigation going on or an accusation of harassment. The clerk at the Dakota Sheriff in Hasting, Minnesota told me that there was no such accusation against me.

On the same charge of wrongly informing several people that I have harassed women, there is another proof: I was followed at Thermotech many times and often every time I went to the inspection room where all the inspectors on day and afternoon shifts were women.

- 4) Defamation: I started working forThermotech, Hopkins, Minnesota on November 1, 2011 as a Quality Manager. Dennis Schendel, Thermotech Plant Manager reported to Vasim Ahmed, Thermotech Information Technology Supervisor that nobody wanted to hire me because Ford Motor Company told them that I was person. I heard Dennis Schendel telling that storu to Vasim Ahmed on around March 10, 2012 by the Thermotech restroom. At Thermotech, I did not berate any employees but I will call many employees to testify and prove that there was a clear will to destroy not only my Character but also my competence. Dennis Schendel was the plant manager at Thermotech for my first four months there.

When I saw Thermotech HR Manager, the HR manager also told me in a sarcastic way that they did not want to hire someone. I thought she confirmed what Dennis Schendel was saying that Thermotech hired me after a request from Ford Motor Company.

- 5) Harassment and defamation because of information that were communicated by Ford to Thermotech. I was followed many times I went to talk to women quality inspectors and even when I when on the production line. At one instance, in December of 2011 or January of 2012 (we had a meeting on the first Saturn workstation next to the production office, Derek Hinrichs had a camera and talked to Brian Pearson that he had me on a camera looking at a woman. The woman was a production lady, black. I was called by Derek Hinrichs to look at a computer since we were looking for production data. When I looked at the 611 workstation, instead of a computer, there was a lady there turning her back. Derek Hinrichs said "I have him on Camera". The incident here cited was extremely similar to a similar incident at the Ford Twin Cities Assembly plant where the robot cell was stopped and I was called for a breakdown. When I arrived there was a female employee passing. A few minutes later, the Maintenance Manager (contacted to Ford) claimed they had everything on camera.

Many times when I went to the inspector rooms, In was also followed because many quality inspectors were women.

- 6) Harassment being perceived as someone who may harass women or just someone suspect of crimes. I was followed many times by vehicles. One sky blue Ford Escape, a dark blue Ford F150, a dark blue or white Ford Expeditions, many times when I went out driving. The lady in the Ford Escape did not bother to follow me in 2009, 2010, and 2011 when I went

sometimes looking for apartments. I appeared that I was also followed at the clinics. In fact twice at the Fairview clinic at the University of Minnesota, there were people warning: “that’s him”. Sometimes people would also say that: “He knows”, “Me too”, “that him”, “You are a foreigner”, “You are old”, “Psycho”, “Jerk”, “Ass hole”. . Recently on May 9, 2013, a person that followed me along with two other women said: “Asshole, consult”. “Consult” refers to that I was a consultant and should consult and not go back to Ford

- 7) At the DMR (defective material requisition) meetings, the plant manager kept referring to “No way”, “Never”, “not here” which was the same expression that many employees used across the hall talking with quality engineers stating that I would never be a manager there, or that we will see. I would often hear them explaining that I was not from the US but that I was stuck and cannot go anywhere. Derek Hinrichs would also talk about how I will be going back to Ford if I worked well at Thermotech, or call me “crazy”. Then there were many slogans: “Go ahead”, “never “we will see”. This happen almost every day, meaning I would never be a manager at Thermotech, Hopkins, Minnesota.
- 8) In April of 2012, I requested my employee file from Ford. I received an incomplete file. Many of the letters that I officially sent to Ford were not in it. In the file, Many of performance reviews were missing. Letter that I wrote to Ford while working there were also missing
- 9) I wrote to Ford many times. I wrote to them at least four times, they never agreed to discuss with me. Ford motor company wrongly fired me as reprisal (retaliation) for my complaints against discrimination (I have a whole file from the previous lawyer, Jenny Brown). I was fired on June 30, 2008. Normally, we are now beyond the statute of limitation but my complaint is still valid because Ford Motor Company Lawyer and attorney Jenny Brown were still working on an agreement. Jenny Brown kept postponing giving me feedbacks from Ford in terms of results of their investigation and resolution; claiming that Ford was still investigating. I still have not received any information about the result of their investigations and we still have to come to an agreement. I consulted three law firms after I decided that Jenny Brown must no longer defend my interests in the fall of 2010. One law firm decline to defend m claiming that the problem was beyond the statute of limitation. Another law firm reviewed my file and concluded that the issue was not of their expertise and that I should sue Jenny Brown or report her to the Minnesota Bar Association. The third lawyer agreed to mediate with Ford. His name is Mark Onstad. He asked me a modest fee of \$1250 but without a job and with little money. I was unable to afford his service. Because of absence of financial funds, I am filing this lawsuit myself.

## **Background**

The background needs to be understood I this story. Without reading the background, it will be difficult to understand why I decided to leave Thermotech, and why Dennis Schendel’s report to Vasim Ahmed (around March 10, 2012) that nobody wanted to hire me because Ford told them that I

was a person of trouble. He also told them that Thermotech hired me following a request by Ford Motor Company. I believe that Dennis Schendel's claim was true. My Point is that Ford (through their workers) asked Thermotech to hire me in order to destroy my character and in order for them to do everything they could to wrongly show that I was incompetent

Ford motor company wrongly fired me as reprisal (retaliation) for my complaints against discrimination (I have a whole file from the previous lawyer, Jenny Brown). I was fired on June 30, 2008. Normally, we are now beyond the statute of limitation but my complaint is still valid because Ford Motor Company Lawyer and attorney Jenny Brown were still working on an agreement. Jenny Brown kept postponing giving me feedbacks from Ford in terms of results of their investigation and resolution; claiming that Ford was still investigating. I still have not received any information about the result of their investigations and we still have to come to an agreement.

On June 30, 2008, I was terminated by Ford Motor Company. The reason given by Kirk Wurtzel, the plant manager on that morning through a note that he read was that Ford Motor Company was having difficult time and that the company had to downsize. I was also handed a form that had the number of people that were dislocated from the Ford Manufacturing Leadership Program with their age on it.

I worked for Ford for 7 years and I always delivered per standard required by the program otherwise, I would have been kicked out of the program at the end of 2005. My performance reviews can testify on my performance. Besides, my character and leadership was always rated far above the average.

The problem started in Michigan and continued here in Saint Paul while I was working for Ford, as well as after I left Ford. There was a plan to make me look bad meaning incompetent and with a poor character:

- 1) During the Strategy Rotation, I was surprised to be teamed up with a colleague who kept talking about executives and other Manufacturing Leadership employees in many gossips. I saw Labor Relation in Michigan (Livonia) at the time. I heard the manager said that nobody liked me. My question then was to ask what I have done. I can recall that when I sent Joe Hinrichs an email to congratulate him for being name head of Ford Canada, he replied to me that I should have supported my teammate (Dhaval who was my team mate at the powertrain strategy office). I then started thinking that Joe Hinrichs may have been the person who recommended that I be teamed up with Dhaval. Mr. Hinrichs was referring to disputes and disagreement between Dhaval and our direct supervisor, Rich Obermayer. I told Dhaval that I could only support what I saw or heard but he wanted me to report that I experienced the same treatment as he did, which I did not. I did not because he usually had one on one with our direct supervisor that I did not attend. I am now convinced that working with Dhaval was a setup and being associated with the other superintendent in the same office in Saint Paul, MN was a setup.

in fact, I was often followed by people sent by Ford who would start talking about Ford executives or would try to convince me to leave. An employee (manufacturing engineer) was one of them. Vic Startek tried to convince me to apply for a better position to Mona Rinehart (2008), a former Ford Twin Cities Assembly plant manager who was then supposedly a recruiter.

- 2) When I got to Saint-Paul, and after Joe Hinrichs was now the VP of manufacturing, he sent me note (email that he CC to Kirk Wurtzel) that he received from a dealer complaining about Ranger Quality. The tone of the email was accusatory. I took responsibility but I also felt singled out because Ranger quality for the exterior VRT (S07) was good compared to other vehicles.
- 3) The same thing happened in Saint Paul. I never judged anybody but I was asked by a plant manager if I did not talk badly about Kirk Wurtzel, then Lean Manufacturing manager in Saint-Paul. I then understood that there was a set-up game. I got a confirmation of my fear when Kirk Wurtzel told Vic Startek in Vic's office that Damon Bailey and another supervisor were unable to finish the work last Saturday. The work was to start talking badly about Kirk so that I say something. Unfortunately for them, I did not say anything bad about Kirk (September 2005). The same week another superintendent has come to tell me in my office that Kirk was doing all the work and the plant manager nothing. I told the superintendent that I could not comment on it. However, when I got to meet the Dearborn Truck plant manager who was my mentor until I left Michigan ( Rober Webber), he asked me straight about kirk. He asked me to tell him what I said about Kirk that was bad. I clearly explain to him that I said nothing and that I even defended Kirk Wurtzel.
- 4) Hossein Nivi then Director of Ford Leadership program basically told me that I acted like those of my type or those of where I came from after I asked him why I did not get any promotion based on the results that I had delivered on my assignment with data explaining the results . I was insulted and berated on a conference call.
- 5) When I went to see Rose Torelli, I pointed out what was happening at Twin Cities, I did not get any feedback. I never got any feedback.
- 6) I was then let go on June 30, 2008 claiming that it was because of the downsizing. I helped the Plant in improving productivity, quality, and morale. I also helped the plant reduce cost. I even went to help other plants. I prepared most of the work on VQR (Vehicle Quality Reviews) when the plant ran on two shifts, even preparing the material that the other superintendent should have been prepared. My work was presented by plant managers and colleague in from of Vice presidents and Directors at least once every year that I spent at the plant who were congratulated for outstanding work, and took credit.
- 7) I contacted Ford for the most critical incidents of discrimination. I have copies of those letters. My lawyer at the time, Jennie Brown was working with them to come to a resolution but she stop informing about the outcome and the complaint then passed the statute of limitation.
- 8) I hired a lawyer (Jenny Brown) that kept postponing the response, telling me that Ford was

still investigating until the claim got out the statute of limitation. I know believe that she was working against my person for Ford interest. She never communicated all the exchanges between the Ford lawyer and herself until that statute had expired and I have asked her to give me y file back.

#### **9) Other specific cacts**

Ford Motor Company needs to repair the damage done to my person. I have many letters and copies of communications between Ford Lawyer and Attorney Jenny Brown (who does no longer defend me).

During my tenure at the Ford Twin Cities Assembly Plant, I was clearly subject of discrimination and abuse. It happened many times, and when I concluded that it was beyond the acceptable, I contacted the HR department. I contacted Mark Alifata three times, talent Acquisition manager at Ford, Jeff Steigauff once, and Rose the MLP manager at the time. When I met with Jeff Steigauff, Neil Moses (he was an HR coordinator) was there. All those cases were case of clear discrimination where managers either asked me to go back where I came from, or claimed that I was not going to be a manager in the U.S., I should rather go to South Africa (said by the HR manager Bill Rooney as a joke), or the managers had false accusation of defects. When we verified those defects, we could not find any, and the manager in question, Rick Trok then claimed that he would not release the name of the person that told him. I wrote the first time when Rick Trok berated me for no reason, as I told him that all the assignments were covered.

At Ford Twin Cities Assembly Plant, I completed 90% of the work required in VQR (Vehicle Quality reviews) for the Trim department and associated variation reduction teams (VRT) even though we were two superintendents working on each shift. I did so even when I was on Night shift. I usually had to stay until 7 to 9 PM on day to make sure that assignment were communicated and covered on the afternoon shift. I had to do because many assignments were not completed on night shifts.

During my first month at the plant, I reviewed the Trim department downtime data and did a comparative analysis of downtime per shift. The analysis help determine bottleneck areas, variations that were operators dependent and those that were inherent to the process itself and that included process ergonomic , work sequences, work layout, and production equipment variation. It is that initial analysis that defined the tasks needed to remove production losses from the Trim Area. A critical task was the reduction of variations from the Instrument Panel line. Did I do that alone? No. I work with a team made of industrial engineers, production supervisors, maintenance, the working groups, quality leaders, ergonomic coordinators, union committee person, the and working groups.

When the Vice President of manufacturing of the time (Matt Demars) visited the plant, I prepared two of the presentations that he reviewed but I was not given the opportunity to present the work. The presentation made the plant and management look good. I made the plant manager look good again in 2006 and in 2007 as my work was presented. I never complained because I wanted the

team to succeed.

By October 2006, I volunteered to help in the launch of the Edge in Oakville, Ontario. The Launch Manager (Daniel Sanders, working under the director of manufacturing (Mr. Ohm) at Oakville Assembly) appreciated the work that I performed for them and sent a note by email testifying about the quality of my work. The truth is that I have strangely been victim of retaliation for standing for what was right.

I volunteered to complete project that were should under the responsibility of other department such as Engineering, Incoming Quality, or Chassis: I kicked off CBT quality meetings, I kicked off windshield meetings involving suppliers and other functional groups, I completed a full analysis of the weather-strip quality issues and issues reports with a plant of actions involving the supplier, engineering, production, and leadership support; I kick-off and ran bar code scanning quality improvement meetings where the primarily responsibility was under the Information technology department, I completed a full analysis of injuries of the whole trim department and issued a report to Final Area Manager and the HR Manager. I completed or coached on many Black Belt and Green Belt projects with elimination of defects: Airbag warning light, door panel misassemblies as example. By 2007, Trim had had the best improvement in quality, Safety, and Throughput.

All the instances of retaliation figure on letters that I sent to Ford Human resources. Ron Gray retaliated against me when I reported Rick Trok to HR. He directly claimed that he reported that I was not a team player on my performance appraisal form because I reported on Rick Trok to HR.

I had to report Rick Trok because he constantly looked for something wrong in Trim, and when he could not find it he became a bully with jokes such as : a foreigner is not going o make it here, or just plain insults, and threats. His most astonishing joke was on a night when we were celebrating employees with high seniority or employees that were retiring. Rich Trok would ask about anyone who remembered an English man who also came to Saint Paul in a rotation a few years ago. He then claimed that the English man could not make it even though he knew what he was doing because of his British accent. He would then joke that the English man went to Canada or Back to England. Someone would then answer that the English man went to Chrysler. I went to see Rick Trok in his office to ask him what I was doing wrong. I asked him face to face what I have done to him. He told me that he heard from people that I was not taking care of quality but he could not give me their names.

I was retaliated when I reported Vick Startek (he asked me to go where I came from on the radio). Afterwards, retaliations in form of rudeness became noticeable in the start-up meetings where Vic would ask me a question and as soon as I started answering he scream "Stop". I one of the meeting he asked me to explain why I was over by a few people, when I started explaining, he asked me to stop or I would send me to HR. I reported a few incidents to HR and reported a few incidents in them in the feedback reports. However, there were many incidents that I never reported, and I

know most people would have. For instance, Kirk came to me and clearly stated that I should have given the highest rating to my boss Ron Gray on the feedback survey. I then knew that although the feedback reports were communicated as anonymous, they were not. In fact Kirk knew everybody's answers a few days after the survey was completed.

Because of the numbers of instances when I was told to go where I came from and the number of times that I was discriminated against, the fact that the campaign of defamation continued after I was fired is understandable because the people involved at the Twin Cities Assembly plant and in Michigan had to intimidate me so I did not file a law suit. Their campaign of defamation if succeeded would have helped justify their decision to fire me. The big Ford Expedition trucks or Ford Escape that followed me were doing so to intimidate me. My house was listened to with a bug; my car was listened to until recently. They have tried to reduce me to a "nobody".

**Note:** The incident with Rick Trok (2006) and Vic Startek were missing from my employee file that I requested by April 2012. I sent it to Ford HR but none of the incident figured in my Ford employee file.

### Summary

The several discriminations that occurred at Ford Twin Cities from 2005 to 2008 resulting in my forced separation as a retaliation although my performance reviews showed that I was at least among the top 25% performers of Ford Motor Company. The discriminating acts were clearly and explicitly stated as because of my national origin, being often asked to go where I came from. More, after being separated, Ford represented by its employees informed other companies and authorities that I harassed women and that I was a person of trouble. All those negative unjustified attributes led to me having a wrong reputation which may not help me find a decent job after sending more than 3000 applications of employments. Worse, By setting up my hiring with Thermotech, Ford Motor Company created another opportunity of discrimination and self fulfillment prophecy where a selected Thermotech's employees and managers had to do everything to prove that I was incompetent and a "nobody". The damage to my life, and my family cannot be appraised. I need justice. I need the wrong done to be corrected.

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WHEREFORE. Plaintiff demands judgment against defendant as follows

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Dated: May 29, 2013

Signed: \_\_\_\_\_

Plaintiff's name

Gregoire Nleme

Print Name

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Eagan MN, 55123

Telephone Number

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