

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BARBARA ANN WILSON,)	
)	
)	2:10-cv-02386-KOB
Plaintiff,)	
)	
v.)	
)	
THE CITY OF BIRMINGHAM;)	
et al.,)	
)	
Defendants.)	

AFFIDAVIT OF BARBARA WILSON

1. My name is Barbara Wilson. I am over the age of 19 and make the following statement freely and voluntarily. I swear or affirm the following statements to be true, accurate and within my personal knowledge.
2. During the course of my employment at the library, I was subjected to numerous unwelcome, offensive sexually charged acts by library patrons.
3. The first time I was subjected to unwelcome, offensive sexually charged conduct by a patron while at work was in the fall of 2002, shortly after I began working at the library. During the first several years I worked at the library, patrons made sexual comments about my body such as "You have some big titties," "You have a nice ass" and "Look at you just shaking that ass." Patrons also looked at pornography on the computers on a daily basis. I was also required to print pornographic pictures at the request of patrons. When I complained to my department head, she said "If they pay for the printing, you have to print it."
4. During the six months before I filed my EEOC Charge, I was subjected to unwelcome and offensive, sexually charged comments, touchings or gestures by library patrons while at work many times. I was subjected to pornography on computers on a daily basis. I was subjected to patrons fondling or masturbating their genitals on at least two occasions. Patrons made advances on me, asking me out on dates dozens of times. I had one patron rub up against my buttocks with his erect penis. Other patrons would come in and stare at me.
5. After I filed my EEOC Charge, I continued to be subjected to unwelcome, offensive


sexually charged conduct by patrons, right up until I finally had to leave work because of how it affected me in late November, 2010. I continued to be subjected to pornography on the computers on a daily basis. I also was asked out by patrons on a regular basis. One patron made comments about how nice my body was and then asked me out. When I declined, he grabbed my hand and tried to hold me where I could not move. One patron came in almost every day for several months and sat at a desk near my desk and stared at me. He had been kicked out one day and then returned the very next day. He also followed me from floor to floor. On one occasion, a patron told me "You have pretty lips." Another told me "I want to paint your face" with a nasty look on his face. A few months before I left the library, I believe in June of 2010 or thereabouts, a patron turned in his laptop to me which still had pornographic images on the monitor. He stood there and stared at me as I looked at the laptop, even after I gave him his ID back.

6. On dozens of occasions, I have observed patrons who saw that I had seen pornographic pictures or video on the computers they were using. In those instances, I regularly observed the patrons make eye contact with me, smile, and stare at me while continuing to look at the pornography. It was clear they enjoyed making me uncomfortable.
7. As far as I can remember with one exception, the pornographic sites which were accessed by male patrons in my presence depicted only heterosexual sexual acts or nude pictures of females without depictions of males. They did not include pictures or videos depicting males without females. They included sites such as "watchmygf.com" and "teensexmania.com," among many others.
8. I have observed and made eye contact with patrons who saw that I had seen them masturbating or fondling their genitals. In those instances, I observed the patrons make eye contact with me, smile, and stare at me while continuing to fondle themselves.
9. Twenty or more times, male patrons would leer at me and follow me around the library. Several different patrons did this. One in particular kept doing this during my last year at the library. He would say things like "When are we going to go out?" "Are you going to marry me?" and "Stop calling me a man-whore."
10. All of the sexually charged acts directed at me or to which I was exposed during my employment were perpetrated by males.
11. For most of my career there, I worked on the third floor of the downtown library eight hours a day, five days a week. I never saw a patron continue to view pornography or masturbate after being caught engaging in that conduct by male employees.
12. I have never seen any patron ask one of my male co-workers for a date, say sexually

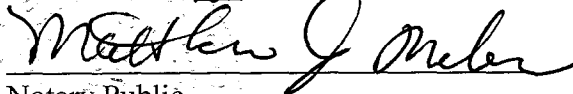
explicit things about their bodies, follow them around the library or touch them in any manner, let alone in the vicinity of their chest, buttocks or genitals.

13. Long after I had been complaining about patrons subjecting me to unwanted advances and pornography, I was required to check laptops which were returned by patrons after they had checked them out for use. We were told to check for and make a note of any pornographic sites which were accessed, so the IT department could add those sites to the filter. In order to do this, there were times when the only way to tell what the nature of the sites accessed was, was to look at the content of the site itself and be exposed again to pornography. I did this for several months. It made me feel very sick inside and anxious.
14. I complained many times about the sexually hostile work environment but nothing changed. Management made it very clear they did not care about the problem and I felt I was the one being blamed. One time when I made another report of the problem, Ms. Blaylock told me to "Get over it and stop living in the past." Ms. Blaylock said to me several times "If you don't like it, leave." Ms. Sirman and Ms. Lee also said the same thing to me. That attitude was part of the culture of the library.

Further affiant sayeth not.


Barbara Wilson

Sworn to and Subscribed Before
me on this the 16th day of August 2011.



Notary Public

My Commission Expires: 6-22-2014