

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE CENTRAL DISTRICT OF ILLINOIS**

**U.S. EQUAL EMPLOYMENT  
 OPPORTUNITY COMMISSION,**

Plaintiff,

v.

**RENT-A-CENTER EAST, INC.,**

Defendant.

No. 16-CV-2222

Judge Colin Stirling Bruce

Magistrate Judge Eric I. Long

**DEFENDANT’S RESPONSE TO PLAINTIFF’S MOTION TO QUASH  
 AND MOTION FOR PROTECTIVE ORDER**

**I. INTRODUCTION AND FACTUAL BACKGROUND**

The U.S. Equal Employment Opportunity Commission (“EEOC”) filed this suit complaining that RAC fired Megan Kerr because she is transgender or was transitioning her gender. Kerr was an assistant manager at RAC’s Rantoul store from July 2010 until July 2014, when RAC discovered she used a RAC delivery truck for personal use, without permission, on a Sunday (July 20, 2014), a day all RAC stores are closed. RAC has strict policies prohibiting personal use of the trucks, for liability and cost reasons. RAC ended her employment on July 21, 2014.

The EEOC alleges that Ms. Kerr was set up. More specifically, the EEOC claims that Jason Carnahan, the District Manager, did not approve of Ms. Kerr’s gender transition and ordered store managers (first Russell Kasper and then Jason Morris) to create a reason to fire her. Complaint [Doc. 1] at ¶¶ 14(e)-(x). (Kasper was fired in December 2013 and replaced by Jason Morris in early 2014.) According to the EEOC, in July 2014, Morris put a plan into action to manufacture a reason to discharge Kerr. The EEOC alleges that RAC regularly makes charitable

furniture donations on Sundays, which RAC denies, and that Morris granted express permission to Kerr to use the company's delivery truck on a particular Sunday "in connection with a project of a local civic organization," and then fired her on Monday by claiming that she did not have authorization to use the truck. Complaint [Doc. 1] at ¶¶ 14(n)-(o), (v).<sup>1</sup>

This case is not a simple misunderstanding and there are no subtleties to this lawsuit – someone is telling the truth and someone is lying. As with any such situation, the truth often lies in the details. While in any case the credibility of any witness (including a party) is highly relevant, the information sought by these subpoenas goes directly to the heart of the factual claims made by Kerr – and things that she may well testify to at trial including her damages. Defendant is entitled to evaluate her claims made in this lawsuit, including through subpoenas.

As part of its investigation of this case, RAC intends to serve eight subpoenas and a request for Kerr's U.S. Army records. The EEOC has moved to quash these subpoenas and for a protective order concerning Kerr's military records. In each case however, the records sought concern RAC's defense, Kerr's damages (including the mitigation of them), credibility – or all

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<sup>1</sup> In its First Supplemental Response to Defendant's First Set of Interrogatories, the EEOC provides a description of the alleged July 20, 2014 delivery that differs significantly from the assertion in its Complaint that the delivery was a *pro bono* "service to the community," and made "in connection with a project of a local civic organization." Complaint [Doc. 1] at ¶¶ 14(n) and (o). In its verified, supplemental interrogatory response, the EEOC now asserts that "the July 20, 2014 delivery involved a dislocated family that [sic] the Free Masons provided assistance in obtaining new housing and furniture—including involved [sic] the purchase of merchandise from the Rantoul Store that was kept in storage until the new housing was ready." (Ex. A, Plaintiff's First Supplemental Response to Interrogatory No. 4). The EEOC's description of the nature of the delivery that Kerr allegedly made on July 20, 2014 has evolved from its Original Complaint, where the delivery was described as a charitable donation, to its supplemental interrogatory responses, where the delivery is now described either as: (1) merely the completion of the delivery of furniture purchased from the Rantoul store by a customer (who happens to be a friend of Kerr) and which RAC has no record of such a purchase by this customer, and despite the fact that RAC is closed for business on Sundays; or (2) a "civic project" that centered around the use of a RAC truck to help Kerr's friend—one of whom was Kerr's boyfriend and a Mason—move.

three – and are necessary in order for RAC to defend itself. Further, these subpoenas impose **no** burden on Kerr. In essence, the EEOC is trying to skip past discovery and instead is asking this Court to grant a Motion in Limine not only from RAC using the information at trial but from even knowing the truth. Accordingly, the EEOC’s motion should be denied in full.

## **II. SPECIFICS OF SUBPOENAS AND ARGUMENT**

### **A. RAC’s Subpoena to Demon Dawgs**

Demon Dawgs is a hot dog restaurant where Kerr now admits she worked in July 2016 – during the period for which the EEOC is *still* seeking lost wages. See Motion to Quash [Doc. 28] at 3 & n.4 (EEOC dropping claim for front and back pay as of August 1, 2016). These records are directly relevant to her claims for back pay and RAC’s mitigation defense. See *United States EEOC v. Gurnee Inn Corp.*, 914 F.2d 815, 818 (7th Cir. 1990) (holding that subsequent employment records were relevant to calculation of damages and to defendant’s mitigation defense). The EEOC did not disclose Demon Dawgs as one of Kerr’s past employers in its verified response to RAC’s interrogatory requesting this information.<sup>2</sup> (See Ex. B, Plaintiff’s Response to Defendant’s Interrogatory No. 8). However, during her deposition, Kerr testified that she had indeed worked at Demon Dawgs after her employment at RAC ended. When asked in her deposition why Demon Dawgs was not listed in the interrogatory answer, Kerr’s response was that she only worked there for several weeks. This certainly implies that Kerr herself chooses to disclose what she believes is relevant, not what is required by law. (Ex. C, Kerr Depo. at 187:13-196:24).

In response to additional questioning at her deposition, Kerr testified that the reason she did not disclose this employment to the EEOC was because the Sixth Judicial Circuit Court

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<sup>2</sup> The interrogatory responses were oddly verified by one of the EEOC counsel. (See Ex. D, Verification).

Judge of Champaign County told her that “it was not acceptable employment,” and for that reason refused to order child support based upon the alleged Demon Dawgs employment. (Ex. C, Kerr Depo. at 189:5-191:16). In fact, the court’s records establish that this testimony is false. On July 6, 2016, the Sixth Circuit Court entered a Summary Order confirming that Kerr (aka Megan Vanna) earned net income of \$413.88 per pay period at Demon Dawgs, and ordering child support payments of \$115.88 based upon that income, effective immediately. Notably, this order followed a May 18, 2016 order that Kerr search for and find employment, and also noted that she had failed to produce proof of her income from Demon Dawgs and set the matter for another hearing on August 10, 2016. (Ex. E, July 6, 2016 court order, Bates-stamped RAC 000352-00357). On that date, the court noted that Kerr again failed to provide proof of her income, and set the matter for another hearing on October 5, 2016. (Ex. F, Bates-stamped RAC 000362-000363). In that October 5th hearing, Kerr advised the judge that she had left Demon Dawgs and become employed at Guitar Center, and the judge specifically noted that Kerr had been redacting the pay stubs that she had submitted to the court. (Ex. G, Bates-stamped RAC 000366-367).<sup>3</sup> Considering the evidence and Kerr’s testimony in the aggregate, RAC is entitled to get the actual records and not be left merely to take Kerr’s word for it as to the circumstances of her employment, including why she left. If it turns out that Kerr was not in fact employed at Demon Dawgs, as the EEOC’s interrogatory responses suggest, or even if she was, then Kerr’s fabrications to RAC during her deposition and to a state judge during her child-support hearing speak directly to her credibility, and this is a case where the jury must determine who is telling the truth and who is lying.

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<sup>3</sup> Of particular note in this sequence is the address for Demon Dawgs that Kerr provided the court: 200 Old Barn Road, Barrington, IL. (Ex. H, Bates-stamped RAC 000358). As it turns out, the sole Demon Dawgs restaurant is located in Alsip, Illinois at 11541 S. Pulaski. (Ex. I, available at <http://demondawgs.com/contact-us/>).

The EEOC argues that RAC's request for these records would harm Kerr by alerting her current and former employers that she has brought suit against another former employer. See Motion to Quash [Doc. 28] at 8. This position is insincere and surprising in light of the fact that the EEOC issued a press release which was picked up by several news organizations which then identified Ms. Kerr as being transgender.<sup>4</sup> Even were they sincere, they are not sufficient to prevent discovery. Illinois courts have previously and specifically rejected this argument in denying the EEOC's request to quash subpoenas to former subsequent employers where, as here, the EEOC has been unable to provide information concerning the employer in question. *United States EEOC v. AutoZone, Inc.*, No. 14 CV 3385, 2016 U.S. Dist. LEXIS 172999, at \*5-7 (N.D. Ill. 2016) ("Here, there is good reason for subpoenaing these particular records because the EEOC has not made the complete compensation information available to AutoZone and the records are directly relevant to AutoZone's mitigation defense."); see also *Langen v. Wells Fargo Bank, N.A.*, No. 11-cv-3369, 2012 U.S. Dist. LEXIS 138177 (C.D. Ill. 2012) (denying motion to quash subpoena to current employer on the grounds that "the information sought in the Subpoena is not a fishing expedition, but is reasonably calculated to produce information relevant to the issue of mitigation of damages" and distinguishing the *Woods* case relied upon by the EEOC here).

The EEOC's position that third-party subpoenas in this matter should be quashed out of an alleged concern that by their issuance Kerr might be embarrassed, or that private facts regarding her sexual orientation or gender identity might be made public, is specious in light of the EEOC's publicity campaign at the outset of this case – a campaign that was completely unnecessary, but was specifically designed to bring attention to its lawsuit. RAC's subpoena to

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<sup>4</sup> See <https://www.eeoc.gov/eeoc/newsroom/release/7-19-16.cfm> (last accessed Mar. 23, 2017)

Demon Dawgs relates directly to both RAC's mitigation defense and Kerr's credibility including to a tribunal, and accordingly should not be quashed.

**B. RAC's Request for Kerr's Military Records**

RAC's request to the U.S. military for Kerr's military records relates to Kerr's credibility – the central issue in this case – and also with dispelling testimony that she may provide the jury which may be very damaging to RAC, namely that Kerr is a decorated veteran whom the jury should believe and reward. It appears rather that Kerr may have “stolen valor.” With regard to Kerr's military records, Kerr's Discharge DD Form 214 Active Duty from the United States army reflects that her pay grade upon discharge was an E4 and that she had received an army service ribbon. (Ex. J, Certificate of Release or Discharge From Active Duty, Bates-stamped RAC 000172). However, the resumes Kerr herself has submitted to prospective employers since her termination by RAC reflects her military rank and pay grade as an E6, and represent not only that she was conferred an army service ribbon, but also an “army combat ribbon,” among other recognitions. (Ex. K, Kerr resume, Bates-stamped EEOC 0305-307; Ex. L, Kerr resume 2, Bates-stamped EEOC 00309-310). When confronted with these inconsistencies in her deposition, Kerr testified that she had attained the E6 rank by virtue of “field promotions,” which would not be reflected on her official discharge record, *and conceded that she had never received a combat award that she claimed on her resume*. Ms. Kerr testified that she was “field promoted” from an E-4 to an E-5 for a year, then “field promoted” to an E-6 for a year, then was demoted back down to an E-4 when she was discharged, but that there would be no “paperwork” by the Army to support her story. She testified that she received no extra pay or benefits even though she was allegedly wearing sergeant strips for two out of her four years in the military. (See Ex. C, Kerr Depo. at 161:13-172:11). Kerr also maintained that she was awarded three oak leaf clusters, on three occasions, by the army in recognition of her meritorious service, despite

there being no mention of those awards on her discharge certificate.<sup>5</sup> (See *id.* at 149:5-150:5). As Kerr has continued to represent that she attained a rank and pay grade of E6 (Sergeant First Class), her military records are necessary, at the very least, to confirm that she has misrepresented her military service and prevent her from doing the same in front of the jury, or at least allowing RAC to have a level playing field if she does.

### **C. RAC's Subpoena to the Village of Rantoul**

Likewise, RAC's subpoena to the Village of Rantoul goes directly to the key issue in this case of what Kerr used the truck for and also directly implicates Kerr's credibility. Not only is there evidence disproving the EEOC's contention that this was a preapproved charitable endeavor, there are other facts supporting that Kerr was having financial problems and may have been evicted from her personal or business (tattoo parlor) residence during this time and suggesting that she used the RAC vehicle to move her home or business. Records from Kerr's landlords indicate that Kerr abandoned her apartment in Paxton, Illinois in July 2014, and that the tattoo parlor that she owned and operated as a side business closed sometime that summer. (Ex. M, Kerr's residential rent payment records for June and July 2014, Bates-stamped RAC 00288-00289). Kerr's final rent payment for her tattoo business was in July 2014, and it appears as though the Village of Rantoul shut off power to her tattoo business for nonpayment of utility bills on August 8, 2014. (Ex. N, note from Kerr to landlord Mary Ann Kelly regarding late payment on rent, Bates-stamped RAC 000296; Ex. O, e-mail from Carla Toliver of City of Rantoul regarding date of disconnection of utility services, Bates-stamped RAC 000299). Despite these facts, the EEOC asserts in its sworn interrogatory responses that Kerr lived in her Paxton apartment until late-August or early-September 2014. (Ex. B, Plaintiff's Responses to

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<sup>5</sup> It should be noted that in the EEOC's Motion to Quash, the EEOC does not address the alleged "three Oak Leaf Cluster awards on three occasions."

Defendant's First Set of Interrogatories No. 22). Given this information, and the inconsistent information provided by the EEOC, Kerr may have used the company truck to: (1) move furniture for her friends; (2) move out of her tattoo parlor; and/or (3) move out of her apartment. This conclusion is supported by the evidence and RAC has a reasonable basis to pursue third-party discovery—namely the utility records for Kerr's tattoo business—in order to develop its defense and the facts of the case.

**D. RAC's Subpoena for Previous Academic and Employment Records**

On her resume, that Kerr claims to have used to seek jobs after being fired by RAC, Kerr claimed to have a Bachelor of Arts from Moraine Valley Community College (with a 4.0 GPA nonetheless). But Kerr admitted during her deposition that she had never finished *any* degree. (See Ex. C, Kerr Depo. at 164:6-13; see also Ex. K, Kerr resume). RAC is entitled to see if she attended this college at all. Likewise, Kerr claims she received an EMT and/or paramedic certificate from Grayson County College. (Ex. K, Kerr resume, Bates-stamped EEOC 0305-307; Ex. L, Kerr resume 2, Bates-stamped EEOC 00309-310). RAC seeks to investigate the veracity of this claim, in part to determine why, if Kerr did have an EMT/paramedic certificate, she did not seek work as an EMT during the period for which she now seeks back pay, particularly where such jobs are in high demand and pay higher wages than Kerr is currently receiving. It is also logical for a jury to conclude that any prospective employer may have discovered her dishonesty about her education, and that dishonesty served as a basis for a potential employer to pass her over – rather than her gender or having been fired by RAC.

RAC also seeks employment/ownership records for three previous employers/businesses of Kerr's: Enzo's Pizzeria, FX Game Exchange, and CGX Console Game X Change. For each of these businesses, Kerr claims to have been a co-owner or franchisee, yet can provide only the sketchiest details regarding these purported ownership interests. For example, with regard to

Enzo's Pizzeria, Kerr claimed that she was the co-owner and franchisee with a person named "Joe" – last name unknown – and that she was "working on" financing her alleged franchisee status by submitting portions of her weekly paycheck. (Ex. C, Kerr Depo. at 177:23-178:22). Most importantly, Kerr makes these representations on resumes that she presumably issues to prospective employers and, if as the evidence seems to indicate, Kerr was nothing more than a clerk and pizza cook at these establishments, her actions bear on why she may have difficulty finding a new job as well as her credibility. Given the hazy details concerning these alleged ownership situations, RAC seeks records from the companies to determine the true nature of Kerr's involvement with them. Again, it is also logical for a jury to conclude that any prospective employer discovered her dishonesty, and that served as a basis to pass her over – rather than her gender or having been fired by RAC. It is also relevant for the jury to consider the business experience of Kerr in assessing her mitigation efforts and her truthfulness in discussing them, particularly with prospective employers.

**E. RAC's Subpoena to Guitar Center**

The EEOC has expressly and without condition waived any claim to front and back pay for the period from August 1, 2016 forward. Motion to Quash [Doc. 28] at p. 3, n. 4. RAC appreciates this gesture (and notes that the EEOC purports it has nothing to do with the subpoena and instead is related to the fact that the pay differential is so small), but cannot withdraw the subpoena to Guitar Center without all issues related to it being addressed and resolved. The EEOC has not addressed how Kerr will testify regarding her *emotional distress* damages, much of which may be premised to the loss of career opportunities, benefits, income, and job satisfaction. Without these areas for damages being taken off the table, RAC cannot withdraw its proposed subpoena to Guitar Center, Kerr's employer since August 2016. RAC is entitled to information on salary, benefits, job performance, overtime opportunities, promotional

opportunities and the like. Unless the EEOC also drops claims for emotional distress damages, the subpoena is relevant to the primary issue of emotional damages related to her employment, financial stressors, and the like.

Though the EEOC has stated that Kerr would be harmed in some way if Guitar Center learned about this suit through the subpoena, it has not given anything to the Court to indicate that Guitar Center does not already know. Given the EEOC's press release and the resulting press coverage, and that Kerr has worked at Guitar Center for a nearly a year, it is just as likely to presume that Guitar Center knows of the lawsuit and will not retaliate against Kerr. Given the clear relevance of the information requested, and the lack of any harm presented factually to the Court (rather than by sheer speculation), the EEOC has not established harm.

### **III. CONCLUSION**

For the foregoing reasons, RAC respectfully requests that the Court deny Plaintiff's Motion to Quash and Motion for Protective Order, and for all other relief to which it may be entitled.

Respectfully submitted,

*/s/ J. Bradley Spalding*

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972.801.1465

Dated: March 24, 2017

**CERTIFICATE OF SERVICE**

I, **J. Bradley Spalding**, an attorney, certify that I served the attorney of record named below with a copy of **Defendant's Motion to Compel** via ECF (*Electronic Case Filing*) on March 24, 2017:

**Miles Shultz**  
**Justin Mulaire**  
**P. David Lopez**  
**James L. Lee**  
**Gwendolyn Young Reams**  
**John C. Hendrickson**  
**Gregory M. Gochanour**  
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[miles.shultz@eoc.gov](mailto:miles.shultz@eoc.gov)

U.S. Equal Employment Opportunity Commission  
131 M. Street, N.E.  
Washington, DC 20507

*/s/ J. Bradley Spalding*  
\_\_\_\_\_  
J. Bradley Spalding

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS****U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

**RENT-A-CENTER EAST, INC.,**

Defendant.

No. 16-CV-2222

Judge Colin Stirling Bruce

Magistrate Judge Eric I. Long

**DECLARATION OF COUNSEL J. BRADLEY SPALDING**

I, J. Bradley Spalding, hereby depose and state as follows:

1. I am over the age of 18 and am otherwise competent to testify to the facts set forth in this Declaration. I am an attorney with Littler Mendelson, P.C., and represent the Defendant, Rent-A-Center East, Inc., in the above-captioned matter. As such, I have personal knowledge of the facts set forth below and make this Declaration in support of Defendant's Response to Plaintiff's Motion to Quash and Motion for Protective Order.

2. Attached as Exhibits A through O to Defendant's Response to Plaintiff's Motion to Quash and Motion for Protective Order are true and correct excerpts from deposition testimony taken in this action, and true and correct copies of other documents which have been produced by the parties in this action. Specifically, the exhibits attached are as follows:

- Exhibit A Plaintiff's First Supplemental Response to Defendant's First Set of Interrogatories to Plaintiff, dated November 9, 2016;
- Exhibit B Excerpts from Plaintiff's Response to Defendant's First Set of Interrogatories to Plaintiff, dated October 21, 2016;
- Exhibit C Excerpts from the deposition transcript of Megan Vanna (Kerr), dated January 17, 2017;

- Exhibit D Plaintiff's Verification of Plaintiff's Response to Defendant's First Set of Interrogatories to Plaintiff, dated October 24, 2016;
- Exhibit E Summary Order of the Circuit Court of the Sixth Judicial Circuit, Champaign County, Illinois, dated July 6, 2016;
- Exhibit F Summary Order of the Circuit Court of the Sixth Judicial Circuit, Champaign County, Illinois, dated August 10, 2016;
- Exhibit G Summary Order of the Circuit Court of the Sixth Judicial Circuit, Champaign County, Illinois, dated October 5, 2016;
- Exhibit H Child Support Data Sheet of the Circuit Court of the Sixth Judicial Circuit, Champaign County, Illinois;
- Exhibit I Demon Dawgs contact information, available at <http://demondawgs.com/contact-us>;
- Exhibit J Certificate of Release or Discharge from Active Duty;
- Exhibit K MeganLynn Vanna (Kerr) Resume;
- Exhibit L MeganLynn Kerr Resume;
- Exhibit M Megan Kerr's residential rent payment records for June and July 2014;
- Exhibit N Note from Megan Kerr to landlord Mary Ann Kelly regarding late payment on rent;
- Exhibit O E-mail from Carla Toliver of City of Rantoul regarding date of disconnection of utility services.

I swear under penalty of perjury that the matters testified to herein are true and correct.

SIGNED this 28th day of March, 2017.

*J. Bradley Spalding*  
J. Bradley Spalding

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS  
URBANA DIVISION**

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**vs.**

**RENT-A-CENTER EAST, INC.,**

**Defendant.**

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**NO. 2:16-CV-02222**

**PLAINTIFF EEOC’S FIRST SUPPLEMENTAL RESPONSE TO  
DEFENDANT’S FIRST SET OF INTERROGATORIES TO PLAINTIFF**

Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) hereby makes the following response to the first set of interrogatories by Defendant Rent-A-Center East, Inc. (“RAC”).

**GENERAL OBJECTION & PRELIMINARY STATEMENT**

The EEOC hereby incorporates the General Objection and Preliminary Statement set forth in its Response to RAC’s First Set of Document Requests.

**RESPONSES**

**INTERROGATORY NO. 4**

Plaintiff asserts in Paragraph 14(n) of its Complaint that: “In or around [sic] 2014, the Rantoul Store occasionally made deliveries to or provided other services to or in connection with local civic or charitable organizations or events, as a service to the community. This occasionally included delivering merchandise on a Sunday, when the store was normally closed and normally did not make deliveries.” Please identify every civic or charitable organization to which the Rantoul store made charitable deliveries or provided free services of which Ms. Kerr is aware during her employment; the dates of those deliveries (including every Sunday on which such

deliveries were made while the store was closed for business); and the items delivered or services provided.

**ANSWER:**

EEOC objects to Interrogatory 4 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, the Commission states that in addition to the Sunday furniture delivery on July 20, 2014, the Rantoul store picked up chest freezers during the summer of 2013 from the Rantoul Air Museum. The Rantoul store also picked up equipment loaned to a church for a tractor show sometime in 2013 on a Sunday. This list is not exhaustive, and the investigation continues.

By way of further response, the July 20, 2014, delivery involved a dislocated family that the Free Masons provided assistance in obtaining new housing and furniture—including involved the purchase of merchandise from the Rantoul Store that was kept in storage until the new housing was ready. Kerr made the delivery to Amber Wilkerson (now Amber Shumate). Regarding contact information for other Sunday deliveries, pursuant to Fed. R. Civ. P. 33(d), the EEOC states: *see* EEOC0343.

**INTERROGATORY NO. 16**

If Ms. Kerr has ever been arrested or convicted of a crime, please state for each arrest or conviction the city and state where Ms. Kerr was arrested or convicted, the date of the arrest or conviction, the offense, and the court and case number.

**ANSWER:**

EEOC objects to Interrogatory No. 16 on the basis it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; is overly broad because it seeks information about criminal proceedings that did not result in a convictions, criminal proceedings resulting in convictions that are inadmissible pursuant to Fed. R. Civ. P. 609; and is unlimited as to time.

By way of further response, the Commission states Kerr has not had any convictions within the last ten years for felonies or crimes of dishonesty.

**INTERROGATORY NO. 19**

Please identify by name, address, phone number and e-mail address the landlord, property owner, leaseholder or property manager for each residence and for each business space (other than in connection with her employment with Defendant) used by Ms. Kerr in 2014.

**ANSWER:**

EEOC objects to Interrogatory 19 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, the Commission states: Frank (last name and contact information unknown) was Kerr's landlord at 101 E State Redacted, Paxton, IL.

By way of further response, pursuant to Fed. R. Civ. P. 33(d), the EEOC states: *see* EEOC0062, and EEOC0372 through EEOC0382.

**INTERROGATORY NO. 20**

Provide the date or date range within which Ms. Kerr underwent her gender transition and the date on which Ms. Kerr formally changed her name from Jason to Megan.

**ANSWER:**

EEOC objects to Interrogatory 20 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and is an unnecessary invasion of Kerr's privacy. Interrogatory 20 is also vague.

Subject to and without waiving these objections, the EEOC states: Kerr started presenting consistent with her gender identity at RAC in approximately March 2013. The Commission will supplement this response to include the date Kerr changed her name.

By way of further response, pursuant to Fed. R. Civ. P. 33(d), the EEOC states: *see* EEOC0365.

Respectfully Submitted,

Dated: November 9, 2016

s/ Miles Shultz  
Miles Shultz  
Trial Attorney  
U.S. Equal Employment  
Opportunity Commission  
500 W. Madison St., Ste. 2000  
Chicago, IL 60661  
312-869-8053

**CERTIFICATE OF SERVICE**

I hereby certify that on today's date, I caused the PLAINTIFF EEOC'S FIRST SUPPLEMENTAL RESPONSE TO DEFENDANT'S FIRST SET OF INTERROGATIRES to be served upon the following counsel of record by electronic mail:

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Dated: November 9, 2016

s/ Miles Shultz  
Miles Shultz

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
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Plaintiff, )  
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v. )  
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RENT-A-CENTER EAST, INC. )  
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Defendant. )  
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Case No. 16-cv-2222

**VERIFICATION**

I, Miles Shultz, being duly sworn, depose and say that I am an authorized Trial Attorney of the U.S. Equal Employment Opportunity Commission (“EEOC”), and in that capacity I assisted in the preparation of EEOC’s First Supplemental Responses to Defendant’s First Set of Interrogatories to EEOC for and on behalf of the EEOC and I am duly authorized to do so. Certain of the matters stated therein are not within my personal knowledge; however, to the best of my knowledge, information and belief, the answers were true at the time that I drafted them. To the extent, if at all, that any of these Answers differ from the charging party’s deposition testimony, taken after the Answers were provided, EEOC incorporates by reference the testimony of the charging party.

Dated: November 9, 2016

s/ Miles Shultz  
Miles Shultz  
EEOC Trial Attorney

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS  
URBANA DIVISION

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

RENT-A-CENTER EAST, INC.,

Defendant.

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NO. 2:16-CV-02222

**PLAINTIFF EEOC’S RESPONSE TO  
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Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) hereby makes the following response to the first set of interrogatories by Defendant Rent-A-Center East, Inc. (“RAC”).

**GENERAL OBJECTION & PRELIMINARY STATEMENT**

The EEOC hereby incorporates the General Objection and Preliminary Statement set forth in its Response to RAC’s First Set of Document Requests.

**RESPONSES**

**INTERROGATORY NO. 1**

Identify all persons from whom you or Megan Kerr have received statements, either orally or in writing, sworn or unsworn, regarding any of the allegations made by you in Plaintiff’s Complaint.

**ANSWER:**

EEOC objects to Interrogatory No. 1 to the extent it seeks information protected from disclosure by the attorney client privilege, the attorney work product doctrine, the government deliberative process privilege, and/or Section 706(b) of Title VII, 42 U.S.C. § 2000e-5(b). EEOC does not have an obligation to identify every person with whom its attorneys have decided to communicate about the case.

Plaintiff asserts in Paragraph 14(h) of the Complaint that “[Jason] Carnahan informed [Russell] Kasper that he disapproved of Kerr’s gender transition, and Carnahan instructed Kasper to find a way to discharge Kerr or induce her to quit. Carnahan instructed Kasper to find infractions to document in order to create a basis for terminating Kerr’s employment—that is, to create a pretext for discharging Kerr.” Please identify the specific dates on which Mr. Carnahan issued these instructions to Mr. Kasper and all witnesses to the alleged conversation between Mr. Carnahan and Mr. Kasper.

**ANSWER:**

EEOC objects to Interrogatory 6 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, the Commission states that Carnahan issued these instructions to Kasper sometime after March 2013. The Commission is not aware if there are any witnesses to these instructions. Investigation continues.

**INTERROGATORY NO. 7**

Identify every oral or written communication the EEOC contends supports its position that it conciliated Ms. Kerr’s claim as required by Title VII.

**ANSWER:**

EEOC objects to Interrogatory 7 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and to the extent it seeks information protected from disclosure by the attorney client privilege, the attorney work product doctrine, the government deliberative process privilege, and/or Section 706(b) of Title VII, 42 U.S.C. § 2000e-5(b). EEOC further objects to Interrogatory No. 7 to the extent it calls for information protected by the government deliberative process privilege, the attorney work product doctrine, and/or the attorney-client privilege. EEOC further objects to this interrogatory as the parties have not agreed to waive Title VII’s confidentiality provisions regarding conciliation, and due to the fact that conciliation proceedings are not admissible in any subsequent proceeding. 42 U.S.C. § 2000e-5(b).

Subject to and without waving these objections, the Commission states that the Commission sent Defendant conciliation correspondence on the following dates: February 17, 2016, March 6, 2016, March 8, 2016, and March 29, 2016. Further defendant sent the Commission conciliation correspondence on the following dates: March 6, 2016, March 8, 2016, and March 21, 2016.

**INTERROGATORY NO. 8**

Identify all employers, including periods of self-employment, for whom Ms. Kerr has ever worked or performed work or services of any kind, by stating the following:

- a. the name and address of each employer;
- b. the dates she was employed by such other employers (including working for herself);
- c. her positions with such employers;
- d. all earnings, compensation and/or other benefits she received during such employment; and
- e. the reasons for her separation from the employment, if any.

**ANSWER:**

EEOC objects to Interrogatory 8 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is also overly burdensome in temporal scope.

Subject to and without waiving these objections, the Commission states that prior to working for RAC, Kerr was in the U.S. Army from approximately June 1997 through approximately June 2001. Kerr was a soldier who worked in explosive ordinance disposal. Kerr's rank at the time of her honorable discharge was E-4. After her service in the Army, Kerr was a co-owner and mechanic at Zombie Fish Cycles in Sherman, Texas from approximately February 2001 through approximately September 2005. Zombie Fish Cycles designed and manufactures custom motorcycles. Kerr then worked as a store manager for FX/CGX (a game exchange store), located in Waco and Sherman Texas from approximately June 2001 through approximately 2006 when she quit after FX was sold. Kerr next worked for RAC from approximately September 2005 through July 2014. Kerr currently works for Guitar-Center in Bedford Park, IL. Kerr earns \$10.50 per hour and averages 20 to 24 hours per week. Additionally, from approximately February 2010 through the present Kerr has worked as a tattoo artist. Kerr has tattooed in various locations, and had a tattoo store called Ink's Mistress on South Central Boulevard in Rantoul, IL from approximately February 2014 through approximately August 2014. Investigation continues.

**INTERROGATORY NO. 9**

Identify all businesses that have ever been owned or operated by Ms. Kerr, by stating the following for each:

**ANSWER:**

EEOC objects to Interrogatory 20 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and is an unnecessary invasion of Kerr's privacy. Interrogatory 20 is also vague.

Subject to and without waiving these objections, the EEOC states: Kerr started presenting consistent with her gender identity at RAC in approximately March 2013. The Commission will supplement this response to include the date Kerr changed her name.

**INTERROGATORY NO. 21**

Provide every date on which any EEOC representative engaged in a substantive communication, whether in person, in writing, via e-mail or over the telephone, with Russell Kasper regarding the facts of this case.

**ANSWER:**

EEOC objects to Interrogatory 21 because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible. Subject to and without waiving these objections, pursuant to Rule 33(d), EEOC directs Defendant to the relevant, non-privileged portions of EEOC's administrative file and other documents produced herewith.

**INTERROGATORY NO. 22**

List each of Ms. Kerr's residential addresses for the past 10 years including the dates she lived at each address.

**ANSWER:**

EEOC objects to this interrogatory on the grounds that it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to this discovery of admissible evidence. Subject to and without waiving these objections, EEOC states that Kerr lived at the following addresses in 2014: 101 E State Apt. Redacted, Paxton, IL through late August or early September 2014; Redacted Redacted, Palos Hill, IL; and Redacted, Alsip, IL.

Respectfully Submitted,

Dated: October 21, 2016

s/ Miles Shultz  
Miles Shultz  
Trial Attorney  
U.S. Equal Employment  
Opportunity Commission  
500 W. Madison St., Ste. 2000  
Chicago, IL 60661  
312-869-8053

**CERTIFICATE OF SERVICE**

I hereby certify that on today's date, I caused the PLAINTIFF EEOC'S RESPONSE TO DEFENDANT'S FIRST SET OF INTERROGATIRES to be served upon the following counsel of record by electronic mail:

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Dated: October 21, 2016

s/ Miles Shultz  
Miles Shultz

# Exhibit C

Megan Vanna  
January 17, 2017

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24

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff, No. 16-CV-2222

vs.

RENT-A-CENTER EAST, INC.,

Defendant.

The videotaped deposition of MEGAN VANNA,  
called for examination pursuant to the Rules of  
Civil Procedure for the United States District  
Courts pertaining to the taking of depositions,  
taken before CHERYL L. SANDECKI, Certified  
Shorthand Reporter for the State of Illinois, at  
321 North Clark Street, Chicago, Illinois, on  
January 17, 2017, at the hour of 9:00 a.m.

REPORTED BY: CHERYL L. SANDECKI, CSR, RPR  
LICENSE NO.: 084-03710  
JOB NO.: 548721

Megan Vanna  
January 17, 2017

2

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26 RENT-A-CENTER, INC., by  
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31 andy.trusevich@rentacenter.com

32 Representing the Defendant.

33 Also Present: Mr. Jason Morris  
34 Ms. Christine Nikolich,  
35 Videographer

36

Megan Vanna  
January 17, 2017

3

INDEX		
1	WITNESS	EXAMINATION
2		
3	MEGAN VANNA	
4	EXAMINATION BY MR. TRUSEVICH	5
5		
6	EXHIBITS	
7	NUMBER	MARKED FOR ID
8	RAC Deposition Exhibit	
9	Exhibit 1	Lawsuit 9
	Exhibit 2	Interrogatory Responses 11
10	Exhibit 3	Supplemental Interrogatories 13
11	Exhibit 4	Verification 77
	Exhibit 5	Charge of Discrimination 79
12	Exhibit 6	Resumés 124
	Exhibit 7	Job Applications 125
13	Exhibit 8	EEOC Intake Questionnaire 234
	Exhibit 9	E-mail 248
14	Exhibit 10	Investigator Notes 251
	Exhibit 11	E-mail 308
15	Exhibit 12	Shumate Interview Notes 313
	Exhibit 13	Investigator Notes 338
16	Exhibit 14	Handbook Excerpts 341
	Exhibit 15	Rent-A-Center Policy 345
17	Exhibit 16	Handbook Acknowledgement Form 354
18	Exhibit 17	WebHire Info 361
	Exhibit 18	Assistant Manager Description 401
19	Exhibit 19	E-mail 403
20	Exhibit 20	Lease 405
	Exhibit 21	Receipts 407
21	Exhibit 22	Ledger 412
	Exhibit 23	E-mail 418
22		
23		
24		

Megan Vanna  
January 17, 2017

149

1 listing of those, correct, that the EEOC  
2 produced to us?

3 A. A partial listing of the jobs I've  
4 applied to, yes.

5 Q. Okay. By the way, I may have asked you  
6 this. What years were you in the military?

7 A. It would have been 2000 -- '96 to 2001.

8 Q. '97 to '01, does that sound right?

9 A. It does.

10 Q. And then we know you were an E4, right?

11 A. Correct.

12 Q. Did you get any awards when you were in  
13 the military?

14 A. Yes.

15 Q. What awards?

16 A. Okay. Oak Leaf Clusters. I got three  
17 of those. Army Service Ribbon.

18 Q. Hold on. Oak Leaf Cluster Okay. Three  
19 of those. What else?

20 A. And that's it.

21 Q. Army Service Ribbon; is that right?

22 A. Yes.

23 Q. What's the Oak Leaf Cluster, three of  
24 those? What is that?

Megan Vanna  
January 17, 2017

150

1           A.    On three separate occasions, I  
2 performed meritorious duties.

3           Q.    And you got those while you were in the  
4 service then?

5           A.    Yes.

6           Q.    Is that similar to like a combat award?

7           A.    No.

8           Q.    Did you ever get a combat award?

9           A.    No.

10          Q.    Did you ever hear the term "stolen  
11 valor"?

12          A.    Yes.

13          Q.    And -- and I was in the military too,  
14 by the way.

15                And the stolen valor for people like  
16 you and me, the former service, it's people  
17 saying that they got awards that they never got,  
18 correct?

19          A.    Correct.

20          Q.    And you would agree with me that being  
21 former military like myself and like yourself,  
22 if you meet an ex-soldier that says they got  
23 awards that they really didn't get, that that's  
24 pretty bad, right?

Megan Vanna  
January 17, 2017

161

1 Q. Okay. And you were never a district  
2 general manager at Rent-A-Center, correct?

3 A. No.

4 Q. [As read]: Helping to grow the store  
5 to over a million dollars in revenue.

6 Right?

7 A. Correct.

8 Q. You are saying that's correct. Then  
9 co-owner of mechanic, project designer at Zombie  
10 Fish Cycles February '01 to '05, four years and  
11 eight months you owned that, correct?

12 A. Correct.

13 Q. Soldier U.S. Army, '97 to '01. Do you  
14 see that?

15 A. Correct.

16 Q. That's EOD, explosive ordinance  
17 disposal, right?

18 A. Correct.

19 Q. Basic training. Then what rank do you  
20 tell the people you got out at?

21 A. E6.

22 Q. That's not true, is it?

23 A. There is an issue of field promotion.

24 Q. So were you field promoted to an E6?

Megan Vanna  
January 17, 2017

162

1 A. Yes, for a short time.

2 Q. And that would be reflected on your  
3 discharge papers, field promotion, correct?

4 A. No.

5 Q. Because it's not, is it?

6 A. Because I was demoted. It wasn't an  
7 actual promotion, hence field promotion.

8 Q. So when you say here you're an E6, did  
9 you get out an E6 or were you an E5 -- or, I  
10 mean, an E4?

11 A. I was an E4.

12 Q. So you were saying you were promoted  
13 field promotion. So your military records would  
14 show that you went from an E4 to an E6 and then  
15 back down to an E6 -- E4. That's what you're  
16 testifying under oath, right?

17 MR. SHULTZ: Objection. Foundation.

18 THE WITNESS: No.

19 BY MR. TRUSEVICH:

20 Q. Then how are you an E6?

21 A. Field promotions do not show on your  
22 records. They are given through your command.

23 Q. And I will disagree with you as a  
24 former military, but we'll see what your

Megan Vanna  
January 17, 2017

163

1 military records say. You are telling us  
2 that --

3 A. My --

4 Q. When were you field promoted to an E6?

5 A. When I worked at Fort Hood.

6 Q. So what year would that have been?

7 A. I don't remember.

8 Q. And you were getting E6 pay, right?

9 A. No.

10 Q. Well, what were you getting as an E6,  
11 just a hat to wear with an E6?

12 A. Yes.

13 Q. Anything else?

14 A. No.

15 Q. No benefits as an E6?

16 A. No.

17 Q. Let me ask it this way. There is not a  
18 record on the face of this planet that would  
19 corroborate that you were ever an E6 because you  
20 never were, isn't that true, Megan?

21 MR. SHULTZ: Objection. Form. Foundation.

22 BY MR. TRUSEVICH:

23 Q. Isn't that true?

24 MR. SHULTZ: Objection. Form. Foundation.

Megan Vanna  
January 17, 2017

164

1 THE WITNESS: Not officially, no.

2 BY MR. TRUSEVICH:

3 Q. Franchisee at Enzo's, '94 to '96. Do  
4 you see that?

5 A. Yes.

6 Q. Okay. Then it says under education,  
7 Moraine Valley Community College, bachelor of  
8 arts, BA, grade 4.0. Do you see that?

9 A. Yes.

10 Q. You do not have a BA degree?

11 MR. SHULTZ: Objection. Foundation.

12 THE WITNESS: I do not. It is just something  
13 I was working on.

14 BY MR. TRUSEVICH:

15 Q. Let's go to 310. And, by the way, you  
16 don't have any objection with us asking for your  
17 military records about that E -- to corroborate  
18 that you were ever an E6? You have no objection  
19 to that, do you?

20 MR. SHULTZ: Objection. Form.

21 THE WITNESS: I do, actually.

22 BY MR. TRUSEVICH:

23 Q. What would your objection be?

24 MR. SHULTZ: Objection.

Megan Vanna  
January 17, 2017

165

1 THE WITNESS: It's completely irrelevant to  
2 this.

3 BY MR. TRUSEVICH:

4 Q. Okay. But just so we're clear, you are  
5 testifying under oath, under penalty of perjury  
6 that you would a field promotion from an E4  
7 skipping an E5 and got to an E6, correct?

8 MR. SHULTZ: Objection. Form.

9 THE WITNESS: No. I worked from E4 to E5.

10 BY MR. TRUSEVICH:

11 Q. All right. And again --

12 A. I was not given the board. And then  
13 from E5 was promoted to E6 and still was not  
14 given a board. And then I was discharged  
15 through -- due to my ETS, and I was not  
16 allowed -- I was barred from reenlistment for  
17 being transgender.

18 Q. Okay. So what you're saying is the  
19 military discriminated against you?

20 MR. SHULTZ: Objection. Foundation.

21 BY MR. TRUSEVICH:

22 Q. Right?

23 A. I'm not saying that the military  
24 discriminated against me. I'm saying that due

Megan Vanna  
January 17, 2017

166

1 to the military's policies, I was not allowed to  
2 reenlist.

3 Q. And so you got out?

4 A. Yes.

5 Q. And when you were -- according to you,  
6 when you were promoted from this -- going from  
7 an E4 to an E5, you didn't get paid as an E5,  
8 correct?

9 A. No.

10 Q. How many stripes did you get as an E5?

11 A. Three.

12 Q. And where did you wear those?

13 A. On my shoulder cart.

14 Q. And who was your commanding officer  
15 that gave you this field promotion? Let me  
16 guess, you can't remember.

17 A. Captain Halloran.

18 Q. Captain what?

19 A. Halloran.

20 Q. Halloran?

21 A. Uh-huh.

22 Q. Is that a "yes"?

23 A. Yes.

24 Q. And he gave you a field promotion from

Megan Vanna  
January 17, 2017

167

1 an E4 to an E5, correct?

2 A. Yes.

3 Q. And -- but you didn't get paid for an  
4 E5, right?

5 A. Right.

6 Q. You didn't get any benefits as an E5,  
7 correct?

8 A. Correct.

9 Q. Then you got another -- how long did  
10 you remain as an E5, by the way?

11 A. About a year.

12 Q. So out of the four years you were in,  
13 one year was an E5?

14 A. Yes.

15 Q. And then -- I mean as an E4, correct?

16 A. One -- it would have been about a year  
17 as an E4 and less than a year as an E5 and less  
18 than a year as an E6.

19 Q. And what was an E6 called?

20 A. Staff sergeant.

21 Q. And -- but you didn't get paid as a  
22 staff sergeant, correct?

23 A. No.

24 Q. You got no benefits as a staff

Megan Vanna  
January 17, 2017

168

1 sergeant, correct?

2 A. No.

3 Q. So why would they give you a field  
4 promotion?

5 MR. SHULTZ: Objection. Foundation.

6 THE WITNESS: They needed staff.

7 BY MR. TRUSEVICH:

8 Q. Are you aware that there is military  
9 regs that said in field promotions, that you  
10 have to pay them as that?

11 MR. SHULTZ: Objection. Form. Foundation.

12 BY MR. TRUSEVICH:

13 Q. Did you ever get any backpay?

14 A. No.

15 MR. SHULTZ: Objection. Form. Foundation.

16 BY MR. TRUSEVICH:

17 Q. Did you think maybe the military owes  
18 you some backpay?

19 A. No.

20 Q. If those are military regs that in  
21 field promotions you get paid, do you think that  
22 you ought to get that backpay from the  
23 government?

24 A. No.

Megan Vanna  
January 17, 2017

169

1 MR. SHULTZ: Objection. Foundation.

2 THE WITNESS: I neither want nor desire that  
3 backpay.

4 BY MR. TRUSEVICH:

5 Q. What kind of discharge did you get?

6 A. Honorable.

7 Q. And on that discharge paper, what's it  
8 going to say as far as your rank?

9 MR. SHULTZ: Objection. Foundation.

10 THE WITNESS: E4 because that was my official  
11 documented rank.

12 BY MR. TRUSEVICH:

13 Q. So why did Captain Halloran demote you  
14 from an E6 to an E4 then?

15 A. He didn't demote me.

16 MR. SHULTZ: Objection. Form. Foundation.

17 THE COURT REPORTER: Wait.

18 BY MR. TRUSEVICH:

19 Q. Who did?

20 A. Sorry.

21 Q. Who did demote you?

22 A. I wasn't demoted.

23 Q. Okay. Well, then how did you get from  
24 an E6 to an E4?

Megan Vanna  
January 17, 2017

170

1 A. I ETS'd.

2 Q. Well, if you left as and E6,  
3 wouldn't --

4 A. I didn't leave as an E6, I left as an  
5 E4.

6 Q. Right.

7 A. The field promotions, like you stated,  
8 didn't have any benefits with them. I simply  
9 filled a hole.

10 Q. And that's your testimony, correct?

11 A. Yes.

12 Q. Let's look at next what you got in the  
13 military, according to your resumé, Army Service  
14 Ribbon, right? Do you see that?

15 A. Yes.

16 Q. A combat service ribbon; do you see  
17 that?

18 A. That was misstated.

19 Q. You never got a combat service ribbon,  
20 did you?

21 A. No.

22 Q. In fact, you never got a meritorious  
23 service ribbon either, did you?

24 A. No, I did not.

Megan Vanna  
January 17, 2017

171

1 Q. And, in fact, what you just testified  
2 to the judge and jury under oath just 15 minutes  
3 ago about getting three Oak Leaf Cluster  
4 awards -- do you remember that under oath?

5 A. Yes.

6 Q. And let me just ask you one more time  
7 giving you a chance. You're still saying that  
8 you got three Oak Leave Cluster awards, correct?

9 A. To my knowledge, yes.

10 Q. Okay. And the reason you say to your  
11 knowledge, is you know where I'm going with  
12 this, Megan. Isn't it true that on your  
13 discharge papers and my discharge papers, and I  
14 don't know if the fine gentlemen from the EEOC  
15 serviced in the service, but if they get out, it  
16 lists every single award that anybody got during  
17 the service, doesn't it?

18 MR. SHULTZ: Objection. Foundation.

19 THE WITNESS: Under certain circumstances,  
20 yes. There are some awards that are presented  
21 that are not on your discharge.

22 BY MR. TRUSEVICH:

23 Q. Okay. And if we look at yours, what's  
24 it going to say?

Megan Vanna  
January 17, 2017

172

1           A.    I do not know.  I haven't looked at  
2 mine.

3           Q.    And -- but according to you under oath,  
4 you got three Oak Leaf Cluster awards while you  
5 were in the military, correct?

6           A.    To my knowledge, from what I remember.

7           Q.    And just so we are clear, there is no  
8 Army Meritorious Service Ribbon?

9           A.    No.

10          Q.    There is no Combat Service Ribbon?

11          A.    No.

12          MR. SHULTZ:  Objection.  Form.

13          MR. TRUSEVICH:  All right.  I'm curious,  
14 what's your objection on the form to asking her  
15 whether or not she got a Combat Service Ribbon  
16 when it's on her resumé?

17          MR. SHULTZ:  Asked and answered.  But I  
18 thought you didn't want me --

19          MR. TRUSEVICH:  If I ask, that's why I'm  
20 curious.

21          MR. SHULTZ:  It's your deposition.

22          MR. TRUSEVICH:  All right.

23          MR. SHULTZ:  Objection.  Objection to form  
24 was asked and answered.  You have already asked

Megan Vanna  
January 17, 2017

177

1 BY MR. TRUSEVICH:

2 Q. So as a franchisee, you would have been  
3 on the all the paperwork of the state,  
4 correct --

5 MR. SHULTZ: Objection. Foundation.

6 BY MR. TRUSEVICH:

7 Q. -- as a co-owner?

8 A. As a co-owner?

9 Q. Uh-huh.

10 A. Again, I assume so, yes.

11 Q. Okay. And how long were you the  
12 co-owner or franchisee of FX/CGX Games?

13 A. A couple months.

14 Q. Only a couple months?

15 A. Yes.

16 Q. And why is that?

17 A. I ended up leaving that business.

18 Q. And how long were you a co-owner and  
19 franchisee of a -- of Enzo's Pizza?

20 A. About six months.

21 Q. So as co-owner, did you hire and fire?

22 A. Of which company?

23 Q. Any of -- let's take Enzo's Pizza, as  
24 co-owner and franchisee, did you do all the

Megan Vanna  
January 17, 2017

178

1 hiring and firing for that location?

2 A. I didn't need to. The staff was  
3 already there.

4 Q. So did you have to buy in?

5 A. I was working on that, yes.

6 Q. Well, in order to become a franchisee,  
7 don't you have to plop money down to become a  
8 franchisee?

9 A. Sure.

10 MR. SHULTZ: Objection. Foundation.

11 THE WITNESS: You do.

12 BY MR. TRUSEVICH:

13 Q. And how much money did you plop down?

14 A. Again, it was portions of my paycheck I  
15 was paying in.

16 Q. And that was your agreement with Vinny?

17 A. With Joe.

18 Q. Joe what?

19 A. I don't remember his last name.

20 Q. Okay. So Joe, who you can't remember,  
21 but you were his business partner, right?

22 A. Yes.

23 Q. Is there a single document on the face  
24 of this planet that you have in your possession

Megan Vanna  
January 17, 2017

187

1 Q. In other words, so you don't get to,  
2 like, get a windfall. Do you understand that?

3 A. Correct.

4 Q. Does that make sense?

5 A. Okay.

6 Q. All right. And when Miles Shultz  
7 verified one of the answers in the  
8 interrogatories of where you worked, he was  
9 relying on you, correct?

10 MR. SHULTZ: Objection. Form. Foundation.

11 THE WITNESS: I wouldn't know.

12 BY MR. TRUSEVICH:

13 Q. Okay. Ma'am, isn't it true that you  
14 had a custody hearing in May of this year and  
15 the judge told you you need to find a job?

16 A. Correct.

17 MR. SHULTZ: Objection. Foundation.

18 BY MR. TRUSEVICH:

19 Q. And then the judge said in August -- in  
20 July, he was actually holding a hearing and said  
21 you better come in July and you better have a  
22 job, correct?

23 MR. SHULTZ: Objection. Foundation.

24 THE WITNESS: Not true.

Megan Vanna  
January 17, 2017

188

1 BY MR. TRUSEVICH:

2 Q. And she -- in fact, in the May order,  
3 she gave you -- she made you apply for five jobs  
4 a day and keep a log, correct?

5 MR. SHULTZ: Objection. Form. Foundation.

6 THE WITNESS: First of all, it was not a  
7 female judge. And I was ordered to keep a job  
8 log, yes.

9 BY MR. TRUSEVICH:

10 Q. And -- and he told you that in July you  
11 better have a job, correct?

12 MR. SHULTZ: Objection. Form. Foundation.

13 THE WITNESS: No.

14 BY MR. TRUSEVICH:

15 Q. And then you had that hearing in July,  
16 correct?

17 A. Yes.

18 MR. SHULTZ: Objection. Form. Foundation.

19 BY MR. TRUSEVICH:

20 Q. And do you remember what you told a  
21 sitting state of Illinois judge of where you  
22 were working in July of 2016?

23 MR. SHULTZ: Objection. Foundation.

24 THE WITNESS: It would have been the

Megan Vanna  
January 17, 2017

189

1 restaurant.

2 BY MR. TRUSEVICH:

3 Q. What restaurant?

4 A. Demon Dogs.

5 Q. Demon Dogs. Let's look at what  
6 Mr. Shultz said where you worked. Let me turn  
7 your attention to Exhibit 2, interrogatory  
8 answer Number 8. And please tell the ladies and  
9 gentlemen of the jury and the judge where does  
10 it show that you worked for Demon Dogs?

11 MR. SHULTZ: Objection. Form.

12 BY MR. TRUSEVICH:

13 Q. Take your time.

14 A. Okay. Demon Dogs isn't listed on this  
15 one. My term of employment there was extremely  
16 short, along with the judge did not accept that  
17 as an acceptable employment for child support.

18 Q. Okay. And so my question was: Is  
19 Demon Dogs anywhere listed on this answer?

20 MR. SHULTZ: Objection. Form.

21 THE WITNESS: No.

22 BY MR. TRUSEVICH:

23 Q. And why was your employment short at  
24 Demon Dogs?

Megan Vanna  
January 17, 2017

190

1           A.    Because I was told it was not  
2 acceptable employment.

3           Q.    And who told -- who told you that?

4           A.    The judge.

5           Q.    Are you saying under oath that at the  
6 July 2016 hearing, the judge told you Demon Dogs  
7 was not a proper place to work and you had to  
8 leave that position?

9           MR. SHULTZ:  Objection.  Foundation.

10          BY MR. TRUSEVICH:

11          Q.    Is that what you're saying a state  
12 judge said?

13          A.    No.

14          MR. SHULTZ:  Objection.  Foundation.

15          THE WITNESS:  I'm saying that neither the  
16 state nor the judge accepted Demon Dogs as  
17 employment, as satisfactory employment.

18          BY MR. TRUSEVICH:

19          Q.    In fact, didn't the judge order child  
20 support based on the Demon Dogs information that  
21 you provided to the state?

22          A.    Not at all.

23          MR. SHULTZ:  Objection.  Foundation.

24

Megan Vanna  
January 17, 2017

191

1 BY MR. TRUSEVICH:

2 Q. In fact, wasn't the state's attorney  
3 also present --

4 A. She was.

5 Q. -- at the hearing? And you told the  
6 state's attorney and the judge that you worked  
7 for Demon Dogs, correct?

8 MR. SHULTZ: Objection. Foundation.

9 THE WITNESS: Yes.

10 BY MR. TRUSEVICH:

11 Q. And the judge at that July 2016  
12 hearing, based on what you said you were making  
13 biweekly at Demon Dogs ordered child support,  
14 correct?

15 MR. SHULTZ: Objection. Foundation.

16 THE WITNESS: No.

17 BY MR. TRUSEVICH:

18 Q. And what was the Demon Dogs location  
19 you worked at?

20 A. There's only one.

21 Q. And what is that location?

22 A. It's in Alsip.

23 Q. In what?

24 A. Alsip.

Megan Vanna  
January 17, 2017

192

1 Q. Alsip. And so whatever address you put  
2 down representing to the state district judge  
3 and to the state's attorney, that would be the  
4 address of where you worked at?

5 MR. SHULTZ: Objection. Foundation.

6 THE WITNESS: Correct.

7 BY MR. TRUSEVICH:

8 Q. And were there -- I mean, this is a  
9 restaurant -- four walls and they must have --  
10 if they are selling hot dogs, they must have an  
11 oven, right?

12 A. Yes.

13 Q. So how big of a place was this?

14 A. I don't have the square footage.

15 Q. Bigger than this conference room?

16 A. Yes.

17 Q. And what -- there was a sign out front  
18 saying "Demon Dogs"?

19 A. Yes.

20 Q. Do you know how long Demon Dogs has  
21 been in business there at that address?

22 A. I have no idea.

23 Q. And you got paid from Demon Dogs,  
24 correct?

Megan Vanna  
January 17, 2017

193

1 A. Correct.

2 Q. So there would be employment records  
3 with Demon Dogs. How long did you work there?

4 MR. SHULTZ: Objection. Foundation.

5 THE WITNESS: Couple weeks.

6 BY MR. TRUSEVICH:

7 Q. All right. So for at least a couple  
8 weeks, there would be employment records at  
9 Demon Dogs, correct?

10 MR. SHULTZ: Objection. Foundation.

11 THE WITNESS: Correct.

12 BY MR. TRUSEVICH:

13 Q. And what was your job title?

14 A. Help.

15 Q. I mean --

16 A. No job title.

17 Q. Well, what would you do all day you  
18 were getting paid for?

19 A. Take money, take orders.

20 Q. Did you have a uniform?

21 A. I had -- not an official uniform. I  
22 had a T-shirt.

23 Q. Okay. What do they wear there at Demon  
24 Dogs?

Megan Vanna  
January 17, 2017

194

1 A. Clothes.

2 Q. And what kind of clothes?

3 A. Clean clothes.

4 Q. Any specific uniform at Demon Dogs?

5 A. T-shirt.

6 Q. And would the T-shirt say Demon Dogs on  
7 it?

8 A. Yes.

9 Q. And you wore that every day?

10 A. Yes.

11 Q. For at least, what, two weeks?

12 A. Thereabout, yes.

13 Q. And what were you getting paid an hour?

14 A. 8.50.

15 Q. All right. So you were getting 8.50 an  
16 hour and working how many hours a week?

17 A. Less than 20.

18 Q. Okay. And at that one Demon Dogs  
19 location in Alsip, Illinois, correct?

20 A. Correct.

21 Q. And that would have been in what, July  
22 of Illinois -- I mean, excuse me, July of 2014  
23 -- 2016?

24 A. Perhaps.

Megan Vanna  
January 17, 2017

195

1 Q. Well, when do you recall working at  
2 Demon Dogs?

3 A. I don't have a specific date. I didn't  
4 keep track of the dates that I worked there.

5 Q. But you are as positive about working  
6 at Demon Dogs as you are about test --  
7 everything else you testified today, correct?

8 MR. SHULTZ: Objection. Form.

9 THE WITNESS: Yes.

10 BY MR. TRUSEVICH:

11 Q. And Demon Dogs would have a record  
12 of -- Demon Dogs would have a record of you  
13 working for them, correct?

14 MR. SHULTZ: Objection. Foundation.

15 THE WITNESS: Correct.

16 BY MR. TRUSEVICH:

17 Q. And you have no doubt about that?

18 MR. SHULTZ: Objection. Foundation.

19 THE WITNESS: Absolutely.

20 BY MR. TRUSEVICH:

21 Q. And can you explain why that money  
22 wasn't listed in that interrogatories?

23 MR. SHULTZ: Objection. Form. Foundation.

24 THE WITNESS: Because it was extremely

Megan Vanna  
January 17, 2017

196

1 minimal money.

2 BY MR. TRUSEVICH:

3 Q. Is there -- let me ask you this, Megan.  
4 Is there any other minimal money that the EEOC  
5 has not told us about?

6 A. No.

7 MR. SHULTZ: Objection. Foundation.

8 BY MR. TRUSEVICH:

9 Q. But we know they didn't tell us about  
10 Demon Dogs, right?

11 A. Correct.

12 MR. SHULTZ: Objection. Form. Foundation.

13 BY MR. TRUSEVICH:

14 Q. Any idea why they didn't tell us?

15 (Untranscribable Cross-talk.)

16 THE COURT REPORTER: Wait. One at a time.  
17 Can you repeat your last question?

18 MR. TRUSEVICH: Sure.

19 BY MR. TRUSEVICH:

20 Q. Do you have any idea why the EEOC did  
21 not tell us about Demon Dogs when we are  
22 entitled to an offset? Do you have any idea?

23 MR. SHULTZ: Objection. Form and foundation.

24 THE WITNESS: Because I didn't bring it up.

Megan Vanna  
January 17, 2017

422

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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

No. 16-CV-2222

vs.

RENT-A-CENTER EAST, INC.,

Defendant.

I, MEGAN VANNA, being first administered an  
oath, say that I am the deponent in the aforesaid  
deposition taken on January 17, 2017; that I have  
read the foregoing transcript of my deposition,  
and affix my signature to same.

MEGAN VANNA

Subscribed and sworn to  
before me this            day  
of                            , 2017.

Notary Public

Megan Vanna  
January 17, 2017

1 STATE OF ILLINOIS )  
 ) SS:  
2 COUNTY OF COOK )  
3

4 I, CHERYL L. SANDECKI, a Certified  
5 Shorthand Reporter within and for the State of  
6 Illinois, do hereby certify that heretofore,  
7 to-wit, on January 17, 2017, personally appeared  
8 before me, at 321 North Clark Street, Chicago,  
9 Illinois, MEGAN VANNA, in a cause now pending and  
10 undetermined in the United States District Court,  
11 wherein U.S. EQUAL EMPLOYMENT OPPORTUNITY  
12 COMMISSION is the Plaintiff, and RENT-A-CENTER  
13 EAST, INC., is the Defendant.

14 I further certify that the said  
15 MEGAN VANNA was first administered an oath to  
16 testify the truth, the whole truth and nothing but  
17 the truth in the cause aforesaid; that the  
18 testimony then given by said witness was reported  
19 stenographically by me in the presence of the said  
20 witness, and afterwards reduced to typewriting by  
21 Computer-Aided Transcription, and the foregoing is  
22 a true and correct transcript of the testimony so  
23 given by said witness as aforesaid.

24 I further certify that the signature to the

Megan Vanna  
January 17, 2017

424

1 foregoing deposition was reserved by counsel for  
2 the respective parties and that there were present  
3 at the deposition the attorneys hereinbefore  
4 mentioned.

5 I further certify that I am not counsel for  
6 nor in any way related to the parties to this  
7 suit, nor am I in any way interested in the  
8 outcome thereof.

9 IN TESTIMONY WHEREOF: I certify to the  
10 above facts this 26th day of January, 2017.

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Redacted

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CHERYL L. SANDECKI, CSR, RPR  
LICENSE NO.: 084-03710

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
RENT-A-CENTER EAST, INC. )  
 )  
Defendant. )  
\_\_\_\_\_ )

Case No. 16-cv-2222

**VERIFICATION**

I, Miles Shultz, being duly sworn, depose and say that I am an authorized Trial Attorney of the U.S. Equal Employment Opportunity Commission (“EEOC”), and in that capacity I assisted in the preparation of EEOC’s Answers to Defendant’s First Set of Interrogatories to EEOC for and on behalf of the EEOC and I am duly authorized to do so. Certain of the matters stated therein are not within my personal knowledge; however, to the best of my knowledge, information and belief, the answers were true at the time that I drafted them. To the extent, if at all, that any of these Answers differ from the charging party’s deposition testimony, taken after the Answers were provided, EEOC incorporates by reference the testimony of the charging party.

Dated: October 24, 2016

s/ Miles Shultz  
Miles Shultz  
EEOC Trial Attorney

# Exhibit E

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS on behalf )  
OF ILLINOIS DEPARTMENT OF HEALTHCARE AND )  
FAMILY SERVICES ex rel. MEGAN KERR, )  
Petitioner, )  
vs. )  
KELLEY A. SHAFFER I/W/a CORNWELL-KERR, )  
Respondent. )

Case: 13-D-97  
IV-D No. C03072697

**FILED**  
SIXTH JUDICIAL CIRCUIT  
JUL 06 2016

*[Signature]*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS

**SUMMARY ORDER**  
 Default  Agreed

This cause having come for hearing before the court on the following matters:

- Complaint/Petition to/for \_\_\_\_\_ filed \_\_\_\_\_.
- Motion to \_\_\_\_\_ filed \_\_\_\_\_.
- Petition for Adjudication of Indirect Civil Contempt filed \_\_\_\_\_; Respondent \_\_\_\_\_ been arraigned on the petition on \_\_\_\_\_.
- Petition to Determine the Existence of the Father and Child Relationship filed \_\_\_\_\_.
- Employment Search Order entered May 18, 2016.
- Order of Indirect Civil Contempt entered \_\_\_\_\_.
- Petition to Set Child Support filed \_\_\_\_\_.
- Petitioner's Petition to Modify, Suspend, or Abate Orders for Support filed \_\_\_\_\_.
- Proof of Income.
- Uniform Order for Support entered \_\_\_\_\_.
- Petition to Intervene filed \_\_\_\_\_.
- Establishment of the Petitioner's child support, child support arrearage and support arrearage payment.
- Application of Petitioner's bond to child support arrearage

The Plaintiff, the Illinois Department of Healthcare and Family Services, appearing by:  Gail Rogers  
 Susan McGrath  \_\_\_\_\_; and the Petitioner, Megan Vanna, appears/does not appear  pro se  
 and by attorney \_\_\_\_\_; and the Respondent, Kelley Shaffer appears/does not appear  pro se  
 in custody  with an interpreter  and by attorney \_\_\_\_\_; and the Court having heard the  
evidence, and being fully advised in the premises, **DOES HEREBY FIND:** *Petitioner's obligation*

- Petitioner is served in open Court on this date with Petition for Adjudication of Indirect Civil Contempt filed in this cause on \_\_\_\_\_.
- Petitioner's net income is \$ 413.88 weekly  biweekly  twice/month  monthly.

**AND THE COURT HAVING HEARD THE EVIDENCE, DOES HEREBY ORDER:**

- Uniform Order of Support is to enter with support set at \$ 115.88 per biweekly effective 7/6/16 and arrearage payment of \$ revised per \_\_\_\_\_. Petitioner is/is not ordered to maintain dependent health insurance. Petitioner is/is not ordered to reimburse for dependent medical insurance in the amount of \$ \_\_\_\_\_ per \_\_\_\_\_.
- Court reserves the issues of support, arrears and dependent health insurance.
- Order of Abatement is to enter effective \_\_\_\_\_ with arrearage \_\_\_\_\_ reserved for the next hearing date \_\_\_\_\_ established in the amount of \$ \_\_\_\_\_ in principal and \$ \_\_\_\_\_ in interest as of \_\_\_\_\_. Arrearage payment is \_\_\_\_\_ reserved for next hearing date \_\_\_\_\_ established in the amount of \$ \_\_\_\_\_ per \_\_\_\_\_ effective \_\_\_\_\_.
- Petitioner's arrearage is \$ \_\_\_\_\_ as of \_\_\_\_\_.
- Petitioner's unpaid purge is \$ \_\_\_\_\_ as of \_\_\_\_\_.
- Employment Search Order is entered continued/suspended/vacated/reinstated 53 jobs/day. Petitioner is ordered to apply for the employment search programs at the unemployment

Last revised: February 2016

- office (Illinois Job Link), and the Salvation Army, and to provide proof of said application and continuing compliance at the next hearing date. On this date Petitioner is not in compliance with the Illinois Job Link/Salvation Army.  For Petitioners/Respondents who live outside of the State of Illinois, seek employment by applying for \_\_\_\_\_ jobs per day, and producing detailed, written records to enable verification of Petitioner/Respondent's efforts to obtain employment at every hearing date.
- The Petitioner is to supply paystubs or other proof of income, from all sources (including self-employment and cash income), for the period starting with this court date, and continuing to the next court date.
  - The Petitioner is to supply a complete Financial Affidavit at the next court date.
  - The Petitioner is to supply a copy of his/her \_\_\_\_\_ tax return together with all schedules, attachments, W-2s and 1099s by the next court date. Petitioner did/did not provide his/her \_\_\_\_\_ tax return Scanned
  - The  Respondent  Petitioner is to provide proof of residency of the minor child/children.
  - The Petitioner is to provide documentation detailing any medical condition that prevents the Petitioner from working on a daily basis and his/her prognosis, diagnosis and treatment. Petitioner did/did not provide documentation.
  - The Petitioner is to provide documentation and status of any application for Social Security benefits.
  - The Petitioner is ordered not to disburse Social Security back pay awards without prior Court approval.
  - The Petitioner is to provide documentation and status of any application for Worker's Compensation, personal injury, financial aid and tuition, and proof of enrollment. Petitioner did/did not provide documentation.
  - The Petitioner is not to disburse Worker's Compensation, personal injury awards, lawsuit proceeds, from probate (inheritance) matters, or any gambling proceeds, without prior Court approval.
  - All other pending issues are reserved.
  - State is to order an accounting.
  - The \_\_\_\_\_ Petitioner's \_\_\_\_\_ Respondent's Petition to Modify is \_\_\_\_\_ granted \_\_\_\_\_ denied \_\_\_\_\_ set for further hearing to the next court date.
  - Other: Respondent Petitioner did not provide proof of income 5/22/16  
7/6/16.
  - Other: The \_\_\_\_\_ Petitioner's \_\_\_\_\_ Respondent's address is protected.

Petitioner and Respondent must report all changes of addresses in writing to the Circuit Clerk, State's Attorney's Office Support Enforcement Division and Illinois Healthcare and Family Services within 7 days.

- The Petitioner and child must appear for genetic testing on \_\_\_\_\_ at \_\_\_\_\_ a.m.
- That this cause is continued to 8/12/16 at 10:30 a.m. before the Honorable Brian L. McPheters, Courtroom J, 101 E. Main St., Urbana, Illinois 61801.

THE  PETITIONER  RESPONDENT MUST APPEAR AT THE ABOVE DATE AND TIME. FAILURE TO APPEAR AS ORDERED BY THE COURT MAY RESULT IN A BODY ATTACHMENT BEING ISSUED FOR YOUR ARREST. IF YOU FAIL TO APPEAR, THE RELIEF REQUESTED MAY BE GRANTED BY DEFAULT.

**Petitioner's Information:**

Address: Redacted  
City, State, Zip: Redacted  
Phone: \_\_\_\_\_

**Petitioner's Employer Information:**

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
Phone: \_\_\_\_\_

Redacted

DATED: July 6, 2016 ENTER: \_\_\_\_\_ JUDGE

Prepared by:  Gail Rogers  Susan McGrath  \_\_\_\_\_: Child Support Division, Champaign County State's Attorney's Office, 101 E. Main St., P.O. Box 127, Urbana, IL 61803-0127; SupportEnforcement@co.champaign.il.us; Tel: (217) 384-3850 Fax (217) 384-3851

Last revised: February 2016

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS, )  
 ex rel. Megan Kerr, )  
 Petitioner, ) No. 13-D-97  
 vs. ) IV-D No. C3072697  
 )  
Kelley A. Shaffer f/k/a Cornwell-Kerr, )  
 Respondent. )

**FILED** *Processed*  
SIXTH JUDICIAL CIRCUIT

JUL 06 2016

*Shirley M. Anderson*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS

**UNIFORM ORDER FOR SUPPORT**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Agreed        | <input checked="" type="checkbox"/> Temporary |
| <input checked="" type="checkbox"/> Initial Order | <input type="checkbox"/> Permanent            |
| <input type="checkbox"/> Modification             | <input type="checkbox"/> Amended              |
| <input type="checkbox"/> Default                  |   |

**Definitions:**

*Obligor*- An individual who owes a duty to make support payments pursuant to an order for support.  
*Obligee*- An individual to whom a duty of support is owed or the individual's legal representative.  
*Payor*- Any payor of income to an Obligor.  
*Unallocated Support*- A total amount for maintenance and child support and not a specific amount for either.

**The Court finds:**

- a)  The net income of the Obligor as of the date of this order is \$413.88 biweekly.
- b)  The amount of child support arrearage is reserved.
- c)  The amount of child support cannot be expressed exclusively as a dollar amount because all or a portion of the Obligor's net income is uncertain as to source, time of payment, or amount.

It is ordered that Megan Vanna, Obligor, is to provide:

**MAINTENANCE** OR  **UNALLOCATED SUPPORT**

Payment Amount:

Current Maintenance or  
Unallocated Support Payment: \$ \_\_\_\_\_  
 Arrearage Payment: \$ \_\_\_\_\_

Payment Frequency:

- every week
- every other week
- monthly
- twice each month on \_\_\_ & \_\_\_ (date)
- every year
- other \_\_\_\_\_

Payments Begin: \_\_\_\_\_ (date)

**CHILD SUPPORT** (Do not complete this section if Unallocated Support is ordered.)

Payment Amount

Current Child Support Payment: \$115.88  
 Current Medical Support Payment: \$ \_\_\_\_\_  
 Arrearage Payment: \$ \_\_\_\_\_

Payment Frequency:

- every week
- every other week
- monthly
- twice each month on \_\_\_ & \_\_\_ (date)
- every year
- other \_\_\_\_\_

Payments Begin: July 6, 2016 (date)

**PERCENTAGE AMOUNT OF CHILD SUPPORT**

(Complete this section only if finding c) is checked above.)

In addition to the specific dollar amount of support ordered above, current child support shall be paid in the amount of \_\_\_\_\_% of Obligor's \_\_\_\_\_ payable \_\_\_\_\_. The Obligor is further ordered to provide income records sufficient to determine and enforce the percentage amount of child support, within 7 days of receipt of income subject to this percentage assessment, to the  Obligee and  Clerk of the Court.

**PAYMENT ARRANGEMENTS**

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Check only One

(Payments must be sent to the STATE DISBURSEMENT UNIT if this box is checked.) A Notice to Withhold Income shall issue immediately and shall be served on the employer at the address listed in this Order. Payments shall be made payable to the State Disbursement Unit and sent to the State Disbursement Unit at P.O. Box 5400, Carol Stream, IL 60197-5400. Payments must include CASE NUMBER, COUNTY of the Court issuing this Order, and Obligor's name and social security number. Any subsequent employer may be served with a Notice to Withhold Income without further order of Court.

The parties have entered into a written agreement providing for an alternative arrangement for the payment of support that is approved by the Court and attached to this Order, meeting all requirements of, and consistent with, applicable law. An income withholding notice is to be prepared and served only if the Obligor becomes delinquent in paying the order for support. Payments shall be made in accordance with the written agreement of the parties attached hereto. In the event the income withholding notice is served, payments shall be made to the State Disbursement Unit as set forth above.

State law does not require payment to the State Disbursement Unit and the parties have not entered into a written agreement as provided above. Payments shall be made payable to \_\_\_\_\_ and sent to THE CLERK OF THE CIRCUIT COURT at 101 E. Main Street, Urbana, IL 61801. Payments must include CASE NUMBER and COUNTY of the Court issuing this Order.

In addition to and separate from amounts ordered to be paid as maintenance or child support, the Obligor shall pay a \$36 per year Separate Maintenance and Child Support Collection Fee. This sum shall be paid directly to the Clerk of the Circuit Court of Champaign County at 101 E. Main Street, Urbana, IL 61801 and not to the State Disbursement Unit.

**DELINQUENCY**

If the Obligor becomes delinquent in the payment of support after the entry of this Order for Support, the Obligor must pay, in addition to the current support obligation, the sum of (a) \$23.18 for child support per the payment frequency ordered above for child support, and (b) \$\_\_\_\_\_ for maintenance or unallocated support per the payment frequency ordered above for maintenance or unallocated support, until the delinquency is paid in full. (This additional amount, the total of (a) and (b), shall not be less than 20 percent of the total of the current support amount and the amount to be paid periodically for payment of any arrearage stated in the order for support.) A support obligation, or any portion of a support obligation which becomes due and remains unpaid for 30 days or more shall accrue interest at the rate of 9% per annum. Any portion of a support obligation that remains unpaid at the end of a month, excluding the support that came due for that month, shall accrue interest provided in Section 12-109 of the Code of Civil Procedure.

**TERMINATION**

This obligation to pay child support terminates on May 31, 2023 (date) unless modified by written order of the Court. (Insert a date no earlier than the date that the youngest child reaches the age of 18 or is expected to graduate from high school, whichever comes later.) **This termination date does not apply to any arrearage that may remain unpaid on that date.**

The child/children covered by this order is/are: Redacted and Redacted

**INSURANCE**

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The  Obligor,  Oblige,  Obligor and Oblige, shall provide health insurance for the child(ren) by enrolling them in any health insurance coverage available through the  Obligor's,  Oblige's,  Obligor's and Oblige's, employment; or, securing a private health insurance policy, accepted by the Obligor and Oblige or approved by the Court, which names the child(ren) as beneficiary.

Both the Obligor and the Oblige shall be provided a copy of the insurance policy and the insurance card. The name of the health insurance provider and the number of the insurance policy regarding dependent benefits/coverage on the date of this order are as follows:

Name of Health Insurance Provider (s):

Policy No.(s):

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**It is further ordered that:**

The Obligor shall give written notice to the Clerk of the Court, and if a party is receiving child and spouse services under Article X of the Illinois Public Aid Code, to Healthcare and Family Services, **within 7 days**, of:

- any new residential, mailing address or telephone number;
- the name, address and phone number of any new employer, and;
- the policy name and identifying number(s) of health insurance coverage available.

The Obligor shall submit a written report of termination of employment and of new employment, including name and address of the new employer, to the Clerk of the Court and the Oblige **within 10 days**. Obligor and Oblige shall advise each other of a change of residence **within 5 days** except when the Court finds that the physical, mental or emotional health of a party or that of a minor child, or both, would be seriously endangered by disclosure of the party's address. An Oblige receiving payments through income withholding shall notify the Clerk of the Court and the State Disbursement Unit **within 7 days**, of a change in residence. The Obligor and Oblige shall report to the Clerk of the Court any change of information included in the Child Support Data Sheet (Exhibit 1) **within 5 business days** of such change.

**DEVIATION**

- Child Support payment amount deviates from the amount required by statutory minimum guidelines. The amount of support that would have been required under the guidelines is \$ \_\_\_\_\_.

Reasons for deviation: \_\_\_\_\_

**ADDITIONAL CONDITIONS OR FINDINGS:**

The Obligor *must* notify the Illinois Department of Healthcare and Family Services within 7 days of any new residential or mailing address or phone number. If a health insurance provider is named in this order it is only as a statement of the insurance in effect at the time of the entry of this order, not as a limitation of coverage. The Obligor is required to continue insurance according to the terms of the order even if the name of the insurance provider available changes. If an arrearage is stated the failure to include a calculation of the interest due does not operate as a waiver of interest required by law. If on the termination date of this order there is an unpaid arrearage or delinquency equal to at least one month's support obligation, then the periodic amount required to be paid for current support shall automatically continue to be an obligation, not as current support but as a periodic payment toward satisfaction of the unpaid arrearage or delinquency. This periodic payment shall be in addition to any periodic payments previously required for satisfaction of the arrearage or delinquency.

- This order has been entered  upon evidence,  by default,  by agreement.
- The Obligor has appeared  personally,  not,  by counsel.
- The Obligee has appeared  personally,  not,  by counsel.
- The Illinois Department of Healthcare and Family Services provides IV-D services in this case and has appeared by counsel.
- Any monies retained by the Clerk of the Circuit Court shall be remitted through the State Disbursement Unit to:  the Obligee,  Healthcare and Family Services.
- The arrearages are to be distributed pursuant to PRWORA.
- The issue of any child support arrearage due by the Obligor is reserved.
- The issue of any medical support or medical support reimbursement due by the Obligor is reserved.
- It is unknown if the Obligor has insurance available at this time because the Obligor did not appear for hearing.
- The Obligor does not have insurance available through employment or at reasonable cost.
- The issues of child support prior to filing and birthing expenses are reserved
- The Obligor is ordered to pay \$93.00 by certified funds to the Illinois Department of Healthcare and Family Services to pay for genetic testing.
- There is no just reason to delay enforcement or appeal of this order.
- Other: \_\_\_\_\_

The "Child Support Data Sheet" attached hereto, as Exhibit I, is part of this Order.  
 It is ordered that the Circuit Clerk impound Exhibit I until further order of this Court.

DATED: July 6, 2016 ENTER: Redacted  
JUDGE

**FAILURE TO OBEY ANY OF THE PROVISIONS OF THIS ORDER MAY RESULT IN A FINDING OF CONTEMPT OF COURT**

Prepared by:  
Susan W. McGrath  
Senior Assistant State's Attorney  
Office of the Champaign County State's Attorney  
101 E. Main St., P. O. Box 127  
Urbana, IL 61803-0127  
(217) 384-3850

# Exhibit F

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS on behalf )  
OF ILLINOIS DEPARTMENT OF HEALTHCARE AND )  
FAMILY SERVICES ex rel. MEGAN KERR, )  
Petitioner, )  
vs. )  
KELLEY A. SHAFFER f/k/a CORNWELL-KERR, )  
Respondent. )

Case: 13-D-97  
IV-D No. C03072697

**FILED**  
SIXTH JUDICIAL CIRCUIT  
AUG 10 2016  
*Shane A. Robinson*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS

**SUMMARY ORDER**

Default  Agreed

This cause having come for hearing before the court on the following matters:

- Complaint/Petition to/for \_\_\_\_\_ filed \_\_\_\_\_.
- Motion to \_\_\_\_\_ filed \_\_\_\_\_.
- Petition for Adjudication of Indirect Civil Contempt filed \_\_\_\_\_; Respondent \_\_\_\_\_ been arraigned on the petition on \_\_\_\_\_.
- Petition to Determine the Existence of the Father and Child Relationship filed \_\_\_\_\_.
- Employment Search Order entered May 18, 2016.
- Order of Indirect Civil Contempt entered \_\_\_\_\_.
- Petition to Set Child Support filed \_\_\_\_\_.
- Petitioner's Petition to Modify, Suspend, or Abate Orders for Support filed \_\_\_\_\_.
- Proof of Income.
- Uniform Order for Support entered July 6, 2016.
- Petition to Intervene filed \_\_\_\_\_.
- Establishment of the Petitioner's child support, child support arrearage and support arrearage payment.
- Application of Petitioner's bond to child support arrearage

The Plaintiff, the Illinois Department of Healthcare and Family Services, appearing by:  Gail Rogers  
 Susan McGrath  Michael Chang; and the Petitioner, Megan Vanna, appears/does not appear  pro se   
and by attorney \_\_\_\_\_; and the Respondent, Kelley Shaffer, appears/does not appear  pro se   
in custody  with an interpreter  and by attorney \_\_\_\_\_; and the Court having heard the  
evidence, and being fully advised in the premises, **DOES HEREBY FIND:** *Michelle is obligor*

- Petitioner is served in open Court on this date with Petition for Adjudication of Indirect Civil Contempt filed in this cause on \_\_\_\_\_.
- Petitioner's net income is \$ \_\_\_\_\_ weekly \_\_\_ biweekly \_\_\_ twice/month \_\_\_ monthly.

**AND THE COURT HAVING HEARD THE EVIDENCE, DOES HEREBY ORDER:**

- Uniform Order of Support is to enter with support set at \$ \_\_\_\_\_ per \_\_\_\_\_ effective \_\_\_\_\_ and arrearage payment of \$ \_\_\_\_\_ per \_\_\_\_\_. Petitioner is/is not ordered to maintain dependent health insurance. Petitioner is/is not ordered to reimburse for dependent medical insurance in the amount of \$ \_\_\_\_\_ per \_\_\_\_\_.
- Court reserves the issues of support, arrearage and dependent health insurance.
- Order of Abatement is to enter effective \_\_\_\_\_ with arrearage \_\_\_\_\_ reserved for the next hearing date \_\_\_\_\_ established in the amount of \$ \_\_\_\_\_ in principal and \$ \_\_\_\_\_ in interest as of \_\_\_\_\_. Arrearage payment is \_\_\_\_\_ reserved for next hearing date established in the amount of \$ \_\_\_\_\_ per \_\_\_\_\_ effective \_\_\_\_\_.
- Petitioner's arrearage is \$ \_\_\_\_\_ as of \_\_\_\_\_.
- Petitioner's unpaid purge is \$ \_\_\_\_\_ as of \_\_\_\_\_.
- Employment Search Order is entered/continued/suspended/vacated/reinstated \_\_\_\_\_ jobs/day. Petitioner is ordered to apply for the employment search programs at the unemployment

office (Illinois Job Link), and the Salvation Army, and to provide proof of said application and continuing compliance at the next hearing date. On this date Petitioner is/is not in compliance with the (Illinois Job Link/Salvation Army).  For Petitioners/Respondents who live outside of the State of Illinois, seek employment by applying for \_\_\_\_\_ jobs per day, and producing detailed, written records to enable verification of Petitioner/Respondent's efforts to obtain employment at every hearing date.

The Petitioner is to supply paystubs or other proof of income, from all sources (including self-employment and cash income), for the period starting with this court date, and continuing to the next court date.

The Petitioner is to supply a complete Financial Affidavit at the next court date.

The Petitioner is to supply a copy of his/her \_\_\_\_\_ tax return together with all schedules, attachments, W-2s and 1099s by the next court date. Petitioner did/did not provide his/her \_\_\_\_\_ tax return scanned

The  Respondent  Petitioner is to provide proof of residency of the minor child/children.

The Petitioner is to provide documentation detailing any medical condition that prevents the Petitioner from working on a daily basis and his/her prognosis, diagnosis and treatment. Petitioner did/did not provide documentation.

The Petitioner is to provide documentation and status of any application for Social Security benefits.

The Petitioner is ordered not to disburse Social Security back pay awards without prior Court approval.

The Petitioner is to provide documentation and status of any application for Worker's Compensation, personal injury, financial aid and tuition, and proof of enrollment. Petitioner did/did not provide documentation.

The Petitioner is not to disburse Worker's Compensation, personal injury awards, lawsuit proceeds, from probate (inheritance) matters, or any gambling proceeds, without prior Court approval.

All other pending issues are reserved.

State is to order an accounting.

The \_\_\_\_\_ Petitioner's \_\_\_\_\_ Respondent's Petition to Modify is \_\_\_\_\_ granted \_\_\_\_\_ denied set for further hearing to the next court date.

Other: Petitioner did (did not) provide proof of income 7/6/16 - 8/10/16

Other: The \_\_\_\_\_ Petitioner's \_\_\_\_\_ Respondent's address is protected.

Petitioner and Respondent must report all changes of addresses in writing to the Circuit Clerk, State's Attorney's Office Support Enforcement Division and Illinois Healthcare and Family Services within 7 days.

The Petitioner and child must appear for genetic testing on \_\_\_\_\_ at \_\_\_\_\_ a.m.

That this cause is continued to 10/5/16 at 10:30 a.m. before the Honorable Brian L. McPheters, Courtroom J, 101 E. Main St., Urbana, Illinois 61801.

THE  PETITIONER  RESPONDENT MUST APPEAR AT THE ABOVE DATE AND TIME. FAILURE TO APPEAR AS ORDERED BY THE COURT MAY RESULT IN A BODY ATTACHMENT BEING ISSUED FOR YOUR ARREST. IF YOU FAIL TO APPEAR, THE RELIEF REQUESTED MAY BE GRANTED BY DEFAULT.

**Petitioner's Information:**

Address: Redacted  
City, State, Zip: Redacted  
Phone: \_\_\_\_\_

**Petitioner's Employer Information:**

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
Phone: \_\_\_\_\_

DATED: Capital 10 2016 ENTER: \_\_\_\_\_  
Redacted  
JUDGE

Prepared by:  Gail Rogers  Susan McGrath  \_\_\_\_\_; Child Support Division, Champaign County State's Attorney's Office, 101 E. Main St., P.O. Box 127, Urbana, IL 61803-0127; SupportEnforcement@co.champaign.il.us; Tel: (217) 384-3850 Fax (217) 384-3851

Last revised: February 2016

# Exhibit G

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS on behalf )  
OF ILLINOIS DEPARTMENT OF HEALTHCARE AND )  
FAMILY SERVICES ex rel. MEGAN KERR, )  
Petitioner, )  
vs. )  
KELLEY A. SHAFFER f/k/a CORNWELL-KERR, )  
Respondent. )

Case: 13-D-97  
IV-D No. C03072697

**FILED**  
SIXTH JUDICIAL CIRCUIT

OCT 05 2016

*Shirley M. Alderman*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS  
SECRET

**SUMMARY ORDER**

Default  Agreed

This cause having come for hearing before the court on the following matters:

- Complaint/Petition to/for \_\_\_\_\_ filed \_\_\_\_\_.
- Motion to \_\_\_\_\_ filed \_\_\_\_\_.
- Petition for Adjudication of Indirect Civil Contempt filed \_\_\_\_\_; Respondent \_\_\_\_\_ been arraigned on the petition on \_\_\_\_\_.
- Petition to Determine the Existence of the Father and Child Relationship filed \_\_\_\_\_.
- Employment Search Order entered May 18, 2016.
- Order of Indirect Civil Contempt entered \_\_\_\_\_.
- Petition to Set Child Support filed \_\_\_\_\_.
- Petitioner's Petition to Modify, Suspend, or Abate Orders for Support filed \_\_\_\_\_.
- Proof of Income.
- Uniform Order for Support entered July 6, 2016.
- Petition to Intervene filed \_\_\_\_\_.
- Establishment of the Petitioner's child support, child support arrearage and support arrearage payment.
- Application of Petitioner's bond to child support arrearage

The Plaintiff, the Illinois Department of Healthcare and Family Services, appearing by:  Gail Rogers  
 Susan McGrath  Michael Chang; and the Petitioner, Megan Vanna, appears/does not appear  pro se   
and by attorney \_\_\_\_\_; and the Respondent, Kelley Shaffer, appears/does not appear  pro se   
in custody  with an interpreter  and by attorney \_\_\_\_\_; and the Court having heard the  
evidence, and being fully advised in the premises, **DOES HEREBY FIND:**

- Petitioner is served in open Court on this date with Petition for Adjudication of Indirect Civil Contempt filed in this cause on \_\_\_\_\_.
- Petitioner's net income is \$ \_\_\_\_\_ weekly \_\_\_\_\_ biweekly \_\_\_\_\_ twice/month \_\_\_\_\_ monthly.

**AND THE COURT HAVING HEARD THE EVIDENCE, DOES HEREBY ORDER:**

- Uniform Order of Support is to enter with support set at \$ \_\_\_\_\_ per \_\_\_\_\_ effective \_\_\_\_\_ and arrearage payment of \$ \_\_\_\_\_ per \_\_\_\_\_. Petitioner is/is not ordered to maintain dependent health insurance. Petitioner is/is not ordered to reimburse for dependent medical insurance in the amount of \$ \_\_\_\_\_ per \_\_\_\_\_.
- Court reserves the issues of support, arrearage and dependent health insurance.
- Order of Abatement is to enter effective \_\_\_\_\_ with arrearage \_\_\_\_\_ reserved for the next hearing date \_\_\_\_\_ established in the amount of \$ \_\_\_\_\_ in principal and \$ \_\_\_\_\_ in interest as of \_\_\_\_\_. Arrearage payment is \_\_\_\_\_ reserved for next hearing date \_\_\_\_\_ established in the amount of \$ \_\_\_\_\_ per \_\_\_\_\_ effective \_\_\_\_\_.
- Petitioner's arrearage is \$ \_\_\_\_\_ as of \_\_\_\_\_.
- Petitioner's unpaid purge is \$ \_\_\_\_\_ as of \_\_\_\_\_.
- Employment Search Order is entered/continued/suspended/vacated/reinstated \_\_\_\_\_ jobs/day. Petitioner is ordered to apply for the employment search programs at the unemployment

Last revised: February 2016

office (Illinois Job Link), and the Salvation Army, and to provide proof of said application and continuing compliance at the next hearing date. On this date Petitioner is/is not in compliance with the Illinois Job Link/Salvation Army.  For Petitioners/Respondents who live outside of the State of Illinois, seek employment by applying for \_\_\_\_\_ jobs per day, and producing detailed, written records to enable verification of Petitioner/Respondent's efforts to obtain employment at every hearing date.

The Petitioner is to supply paystubs or other proof of income, from all sources (including self-employment and cash income), for the period starting with this court date, and continuing to the next court date.

The Petitioner is to supply a complete Financial Affidavit at the next court date.

The Petitioner is to supply a copy of his/her \_\_\_\_\_ tax return together with all schedules, attachments, W-2s and 1099s by the next court date. Petitioner did/did not provide his/her \_\_\_\_\_ tax return

The  Respondent  Petitioner is to provide proof of residency of the minor child/children;

The Petitioner is to provide documentation detailing any medical condition that prevents the Petitioner from working on a daily basis and his/her prognosis, diagnosis and treatment. Petitioner did/did not provide documentation.

The Petitioner is to provide documentation and status of any application for Social Security benefits.

The Petitioner is ordered not to disburse Social Security back pay awards without prior Court approval.

The Petitioner is to provide documentation and status of any application for Worker's Compensation, personal injury, financial aid and tuition, and proof of enrollment. Petitioner did/did not provide documentation.

The Petitioner is not to disburse Worker's Compensation, personal injury awards, lawsuit proceeds, from probate (inheritance) matters, or any gambling proceeds, without prior Court approval.

All other pending issues are reserved.

State is to order an accounting.

The \_\_\_\_\_ Petitioner's \_\_\_\_\_ Respondent's Petition to Modify is \_\_\_\_\_ granted \_\_\_\_\_ denied set for further hearing to the next court date.

Other: Petitioner is not to redact future paystubs.

Other: The \_\_\_\_\_ Petitioner's \_\_\_\_\_ Respondent's address is protected.

Petitioner and Respondent must report all changes of addresses in writing to the Circuit Clerk, State's Attorney's Office Support Enforcement Division and Illinois Healthcare and Family Services within 7 days.

The Petitioner and child must appear for genetic testing on \_\_\_\_\_ at \_\_\_\_\_ a.m.

That this cause is continued to 11/30/16 at 10:30 a.m. before the Honorable Brian L. McPheters, Courtroom J, 101 E. Main St., Urbana, Illinois 61801.

THE  PETITIONER  RESPONDENT MUST APPEAR AT THE ABOVE DATE AND TIME. FAILURE TO APPEAR AS ORDERED BY THE COURT MAY RESULT IN A BODY ATTACHMENT BEING ISSUED FOR YOUR ARREST. IF YOU FAIL TO APPEAR, THE RELIEF REQUESTED MAY BE GRANTED BY DEFAULT.

**Petitioner's Information:**

Address: Redacted  
City, State, Zip: Redacted  
Phone: \_\_\_\_\_

**Petitioner's Employer Information:**

Name: Greater Center 21092c  
Address: Redacted  
City, State, Zip: Redacted  
Phone: \_\_\_\_\_

Redacted

DATED: October 5, 2016 ENTER: \_\_\_\_\_ JUDGE

Prepared by:  Gail Rogers  Susan McGrath  \_\_\_\_\_; Child Support Division, Champaign County State's Attorney's Office, 101 E. Main St., P.O. Box 127, Urbana, IL 61803-0127; SupportEnforcement@co.champaign.il.us; Tel: (217) 384-3850 Fax (217) 384-3851

Last revised: February 2016

# Exhibit H

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS, )  
 on behalf of HEALTHCARE AND FAMILY SERVICES, )  
 ex rel. MEGAN KERR, (Obligor) )  
 Petitioner, ) No: 13-D-97  
 vs. ) IV-D No: C03072697  
KELLEY A. SHAFFER *f/k/a* CORNWELL-KERR, )  
 Respondent. )

Scanned

**CHILD SUPPORT DATA SHEET**

Pursuant to Circuit Administrative Order 99-2, Sixth Judicial Circuit, the following form must be completed by both parties within 15 days and submitted to the Circuit Court:

PETITIONER INFORMATION

Last Name: Yanna  
 First Name: Megan

Residential Address:  
Redacted  
Redacted

Mailing Address:  
Same As Above

Date of Birth: Redacted  
 Soc. Sec. Number: Redacted  
 Driver's License No: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_

Employer & Employer Address:  
Demon Dawgs of Chicago LLC  
200 Old Barn Rd  
Barrington, IL 60010  
 Work Phone Number: \_\_\_\_\_  
 Employer ID Number: \_\_\_\_\_

RESPONDENT INFORMATION

Last Name: Shaffer  
 First Name: Kelley

Residential Address:  
Redacted

Mailing Address:  
Same As Above

Date of Birth: Redacted  
 Soc. Sec. Number: Redacted  
 Driver's License No: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_

Employer & Employer Address:  
 \_\_\_\_\_  
 \_\_\_\_\_  
 Work Phone Number: \_\_\_\_\_  
 Employer ID Number: \_\_\_\_\_

CHILD/CHILDREN INFORMATION

Last Name	First Name	D.O.B.
_____	<u>Redacted</u>	_____
_____	<u>Redacted</u>	_____

Exhibit '1'

# Exhibit I



we are also active on social media...." to Check us out on facebook

Have a question or a comment? Looking for catering information? Need anything else? Please fill out the form and we will get back to you.

f (https://www.facebook.com/DemonDawgsChicago?fref=ts)

Your Name (required)



Demon Dawgs, 11541 S Pulaski, Alsip, IL 60803  
United States

Your Email (required)



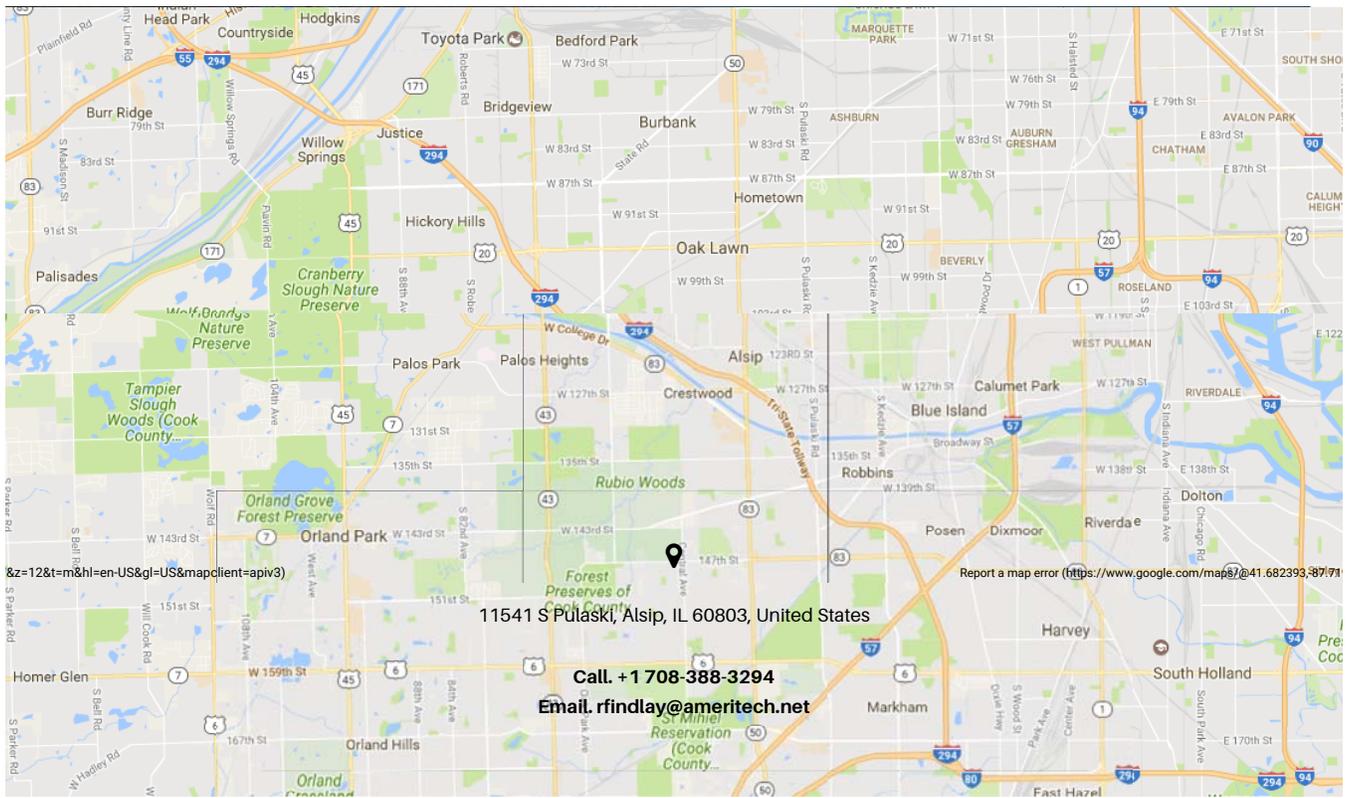
Hour  
Sun - Thu **11:00 AM - 9:00 PM**  
Fri & Sat **11:00 AM - 10:00 PM**

Subject

Call. **708-388-3294**  
Email. **rfindlay@ameritech.net**

Your Message

**SEND**



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# Exhibit J

CAUTION: NOT TO BE USED FOR IDENTIFICATION PURPOSES

THIS IS AN IMPORTANT RECORD. SAFEGUARD IT.

ANY ALTERATIONS IN SHADED AREAS RENDER FORM VOID

CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY						
1. NAME (Last, First, Middle) KERR, JASON MICHAEL		2. DEPARTMENT, COMPONENT AND BRANCH ARMY/RA		3. SOCIAL SECURITY NUMBER Redacted		
4.a. GRADE/RATE/ORB/RANK SPC	4.b. PAY GRADE E4	5. DATE OF BIRTH (YYYYMMDD) Redacted		6. RESERVE OBLIG. TERM. DATE Year 2005 Month 04 Day 27		
7.a. PLACE OF ENTRY INTO ACTIVE DUTY ST LOUIS, MO		7.b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) RANTOUL, IL 61866				
8.a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND 664TH OD CO FC		8.b. STATION WHERE SEPARATED FORT HOOD, TX 76544-5056				
9. COMMAND TO WHICH TRANSFERRED USAR CON GP (REINF) AR-PERSCOM, 9700 PAGE BLVD, ST LOUIS, MO 63132			10. SGLI COVERAGE <input type="checkbox"/> None Amount: \$ 200,000.00			
11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) 55B10 00 AMMUNITION SPECIALIST--3 YRS-6 MOS //NOTHING FOLLOWS		12. RECORD OF SERVICE				
		a. Date entered AD This Period	1997	06	04	
		b. Separation Date This Period	2001	06	03	
		c. Net Active Service This Period	0004	00	00	
		d. Total Prior Active Service	0000	00	00	
		e. Total Prior Inactive Service	0000	00	00	
		f. Foreign Service	0000	00	00	
		g. Sea Service	0000	00	00	
		h. Effective Date of Pay Grade		1999	12	04
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) ARMY LAPEL BUTTON//ARMY SERVICE RIBBON//NOTHING FOLLOWS						
14. MILITARY EDUCATION (Course title, number of weeks and month and year completed) AMMUNITION SPECIALIST PHASE I COURSE, 2 WEEKS, 1997//AMMUNITION SPECIALIST PHASE II COURSE, 8 WEEKS, 1997//NOTHING FOLLOWS						
15.a. MEMBER CONTRIBUTED TO POST-VIETNAM ERA VETERAN'S EDUCATIONAL ASSISTANCE PROGRAM		Yes	No	15.b. HIGH SCHOOL GRADUATE OR EQUIVALENT		
			X	Yes		
				16. DAYS ACCRUED LEAVE PAID 60		
17. MEMBER WAS PROVIDED A COMPLETE DENTAL EXAM AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
18. REMARKS DATA HEREIN SUBJECT TO COMPUTER MATCHING WITHIN DOD OR WITH OTHER AGENCIES FOR VERIFICATION PURPOSES AND DETERMINING ELIGIBILITY OR COMPLIANCE FOR FEDERAL BENEFITS//SUBJECT TO ACTIVE DUTY RECALL, MUSTER DUTY AND/OR ANNUAL SCREENING//BLOCK 6, PERIOD OF DELAYED ENTRY PROGRAM: 19970428-19980601//MEMBER HAS COMPLETED FIRST FULL TERM OF SERVICE//NOTHING FOLLOWS						
19.a. MAILING ADDRESS AFTER SEPARATION (Include Zip Code) Redacted			19.b. NEAREST RELATIVE (Name and address - include Zip Code) Redacted			
20. MEMBER REQUESTS COPY BE SENT TO (City, State or Ven. Affairs) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			22. OFFICIAL AUTHORIZED TO SIGN (Typed name, rank, title and station) Redacted			
21. SIGNATURE OF MEMBER BEING SEPARATED Redacted			W.C. ADDINGTON, GSO, LEAD CLERK, TRANS. GEN.			

DD-Form 214-AUTOMATED, NOV 88

Previous editions are obsolete.

MEMBER - 1

COPY

# Exhibit K

# MeganLynn Vanna

Artist/Owner

Redacted

---

## Summary

Observe, Engineer, Overcome.

---

## Experience

### **Project Manager at Hellfire Club**

December 2015 - Present (11 months)

independent local musician.

### **artist/Owner at InksMistress Tattoo**

February 2010 - Present (6 years 9 months)

Apprentised under bombshell tattoo in Sherman Tx and continued there as an artist after bombshell became The Yellow Rose Under new management and continued to work as an artist till it closed.

I moved to Illinois for family reasons and opened Ink's Mistress in Rantoul IL early 2013.

### **District General Manager at Rent-A-Center**

September 2005 - July 2014 (8 years 11 months)

Highered mid year in Sherman tx as a Customer Account Representative I vary quickly gained customer accounts tripling my Accounts with in a year.

Under new store management I was promoted to Assistant store manager Credit

Helping to growing the store to over a millinion dollars in revinue I was again promoted Assistant Manager Sales

continueing to maintain momentom I was promoted to Store Manager of a failling store in Sherman Tx

After increasing that stores revinue to just under 1 million dollars i was again promoted to District Manager. I moved to Illinois.

During my transition the former district manager did not vacate his position. And i was offered a temporary posion as a sales leader.

Till a District Manager position opened up.

I left to run my own business.

### **Co Owner, Mechanic, project manager, designer at Zombie Fish Cycles**

February 2001 - September 2005 (4 years 8 months)

Custom motercycle/ Racing Company

**Soldier at U.S.Army**

June 1997 - June 2001 (4 years 1 month)

Explosive Ordinance Disposal

Basic training: Fort Jackson S.C.

AIT: Egland AFB Fl, Red stone Arsenal Md.

Home location: Fort Hood, Tx -1st cavalry/4th Id

64th Ordnance Corps.

Rank E-6

Description of duties: To disarm commercial and private ordinance.

To maintain millitary and civilian safty.

**Franchisee at Enzo's**

October 1994 - June 1997 (2 years 9 months)

Restaurant Owner and Executive Chef.

---

**Skills & Expertise**

**Management**

**Microsoft Office**

**Photography**

**Graphic Design**

**Sales**

**Art**

**Social Networking**

**Customer Service**

**Illustrator**

**Painting**

---

**Education**

**Moraine Valley Community College**

Bachelor of Arts (B.A.), Fine/Studio Arts, General, 2014 - 2015

Grade: 4.0

**Grayson County College**

medical sciences, Emergency Medical Technology/Technician (EMT Paramedic), 2004 - 2005

---

**Volunteer Experience**

**Project Coordinator at The Modified Dolls**

December 2014 - November 2015

**Meal preparation, Confidant at The Crib**

December 2015 - Present

Prepare food for homeless kids.

---

# Exhibit L

## MeganLynn Kerr

I started early with a small paper route. And grew it in to a big paper route covering the town I grew up in back when newspapers were still the best way to get daily news. Then, I moved in to a small business of my own. That carried me in to high school. I moved on to owning a franchise store. But, I wanted to see the world so I joined the military. And was not disappointed. I took a job with a billion dollar corporation I excelled to a point but became frustrated with my inability to continue to move forward. So now I'm looking for that opportunity in your company.

I choose to peruse a career and in doing so I did not finish high school in the traditional sense. I grew up in a small town with no options for alternative education so I choose to get a G.E.D. While in the military, I received an extensive education in what would in translate to mechanical engineering and medical sciences. When I returned to being a civilian I continued to cultivate my medical sciences education in to an EMT certificate issued by Grayson county college in Denison, TX. I am currently continuing my education at Moraine Valley and planning to transfer to Worsham College.

In summery I am a motivated person. I have set lofty goals for myself and I have strived to achieve them. I want a career that will not only help me set new goals. But, allow me grow as a person. And as a professional.

## *Work History*

## 2001-2004

### United States Army Explosive Ordinance Disposal Technician.

Skills: discipline, self-respect, and leadership.

Experience: Medical triage, First Aid, Mechanical Engineering,

Achievements/ Accolades:

Army service ribbon

Combat service ribbon

Meritorious service ribbon

E.O.D. service pin

## 2004-2014

### Rent-A-Center sales manager

Skills: installation, repair, and service of merchandise. Management of credit standards, Management of sales goals. Management of customer service, management of day to day store operations

Experience: Accounts Manager, Credit Manager, Sales Manager. Assistant store Manager, Store Manager Assistant District Manager. Personnel management

Achievements/ Accolades:

Grew multiple stores from 300 to 800 accounts in one year.

Maintained credit and sales standards through entire employment will maintaining positive customer report.

Reduced repair / service costs by doing on sight repairs \$10,000 in one year.

## 2014-2015

### Tattoo Artist Ink's Mistress Tattoo self employed

Skills: create and design original art work.

Experience: Owner artist

Certifications: blood borne pathogens.(current till 2016)

Achievements/ Accolades: Extensive portfolio

# Exhibit M

**R.J. FLAT'S - 105 E. STATE**

**RENT COLLECTION FOR MONTH OF** JUNE 2014

<u>UNIT</u>	<u>AMOUNT</u>	<u>COLLECTED</u>
Redacted	<u>400.<sup>00</sup></u>	<u>500.<sup>00</sup> (OK)</u>
<u>APT. #2</u> MEGAN	<u>395.<sup>00</sup></u>	<u>400.<sup>00</sup> (OK)</u>
Redacted	<u>400.<sup>00</sup></u>	<u>400.<sup>00</sup> (OK)</u>
Redacted	<u>350.<sup>00</sup></u>	<u>350.<sup>00</sup> (OK)</u>
Redacted	<u>375.<sup>00</sup></u>	<u>375.<sup>00</sup> (OK)</u>
Redacted	<u>340.<sup>00</sup></u>	<u>300.<sup>00</sup> NEED 40.<sup>00</sup> (OK)</u>
Redacted	<u>250.<sup>00</sup></u>	<u>250.<sup>00</sup> (OK)</u>
Redacted	<u>400.<sup>00</sup></u>	<u>NEED 400.<sup>00</sup></u>
Redacted	<u>300.<sup>00</sup></u>	<u>300.<sup>00</sup> (OK)</u>

NEED  
200.<sup>50</sup>  
(OK)

**R.J. FLATS - 105 E. STATE**

**RENT COLLECTION FOR MONTH OF** July 2014

<u>UNIT</u>	<u>AMOUNT</u>	<u>COLLECTED</u>
Redacted	<u>400.<sup>00</sup></u>	<u>300.<sup>00</sup> (ok)</u>
<u>APT. #2 MEGAN</u>	<u>395.<sup>00</sup></u>	<u>No RENT</u>
Redacted	<u>400.<sup>00</sup></u>	<u>400.<sup>00</sup> (ok)</u>
Redacted	<u>350.<sup>00</sup></u>	<u>350.<sup>00</sup> (ok)</u>
Redacted	<u>375.<sup>00</sup></u>	<u>375.<sup>00</sup> (ok)</u>
Redacted	<u>340.<sup>00</sup></u>	<u>340.<sup>00</sup> (ok)</u>
Redacted	<u>250.<sup>00</sup></u>	<u>250.<sup>00</sup> (ok)</u>
Redacted	<u>400.<sup>00</sup></u>	<u>NEED 500.<sup>00</sup></u>
Redacted	<u>300.<sup>00</sup></u>	<u>300.<sup>00</sup> (ok)</u>

NEED  
400.<sup>00</sup> +  
100  
300  
-----  
100 +  
NEED  
500.<sup>00</sup>

# Exhibit N

11-10-10

I am sorry 400 today  
I will send 400 on 7/3 and again on  
7/10.

Sorry for the delay

Redacted

MONEYGRAM PAYMENT SYSTEMS, INC. DRAWER P.O. BOX 5476 MINNEAPOLIS, MN 55480	
PLEASE READ REVERSE SIDE <a href="http://www.moneygram.com/moneyorder">www.moneygram.com/moneyorder</a> DATE/AMOUNT	
20554603181	116/24/2010
134	400.00
<b>RECEIPT</b>	
60528109341093	00
<b>RECIBO</b>	
R205546031812	EMPLOYEE 688 (12/12) 503/5000 M 71901-U
▼ DETACH HERE ▼	

# Exhibit O

Redacted

All Search

Search Mail

Search Web

Home

Redacted



Compose

Archive Move Delete Spam More

Inbox (1)

116 s century Blvd

Drafts

Sent

Carla Toliver Redacted Today at 10:04 AM

Archive

To Redacted

Spam

Under the name of Ink's Mistress Tattoo located at 116 s Century was disconnect for power on August 8, 2014. There service dates were from 2-28-14 until 11-12-14. We serviced there electricity and water. Please let me know if you need any further information regarding this address. Thank You

Trash

Smart Views

Important

Unread

Starred

People

Social

Shopping

Travel

Finance

Folders

Drafts

NWSRA Folder

Outbox

Saved Folder

Synced Messages

Volunteering

Recent

**Equifax Complete™**  
 See How Your Credit Stacks Up  
 \$4.95 with 30-Day Trial  
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800  
789  
795

**START TODAY**

**EQUIFAX**



Redacted

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS**

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

**RENT-A-CENTER EAST, INC.,**

Defendant.

No. 16-CV-2222

Judge Colin Stirling Bruce

Magistrate Judge Eric I. Long

**ORDER DENYING PLAINTIFF'S MOTION TO QUASH  
AND MOTION FOR PROTECTIVE ORDER**

Before the Court is Plaintiff's Motion to Quash and Motion for Protective Order. Having considered the motion, Defendant's response, and applicable authority, the Court DENIES Plaintiff's motion.

IT IS ORDERED that Plaintiff's Motion to Quash and Motion for Protective Order is DENIED.

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_ 2017.

\_\_\_\_\_  
JUDGE PRESIDING