

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

DR. SABINA BURTON,

Plaintiff,

v.

Case No. 14-CV-0274

BOARD OF REGENTS UNIVERSITY OF
WISCONSIN, et al.,

Defendants.

DECLARATION OF JANELLE A. CROWLEY

I, Dr. Janelle A. Crowley, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an adult resident of the State of Illinois. I make this declaration based on personal knowledge.
2. I am currently the Director of Human Resources and Affirmative Action at the University of Wisconsin-Platteville. I have held this position since July 1, 2015. Prior to that, I served as the Chief Human Resources Officer at Elgin Community College from January of 2012 through June of 2015.
3. As the Director of Human Resources and Affirmative Action, my job duties include strategic planning, administrative leadership, and oversight of the human resource functions for the University, including but not limited to recruitment, employee and labor relations, and administration of the human

resource information systems. My office also serves as the custodian of the applicable personnel files of the faculty of the University of Wisconsin-Platteville, including but not limited to employment contracts, salary letters, and requests for additional compensation for these individuals.

4. A true and correct copy of a summary of Sabina Burton's appointment and promotion dates, basic demographic information, and salary is attached as **EXHIBIT I**.
5. A true and correct copy of a July 28, 2009 salary letter from David Markee, Chancellor, to Dr. Burton is attached as **EXHIBIT J**.
6. A true and correct copy of a June 11, 2010 salary letter from Carol Sue Butts, Interim Chancellor, to Dr. Burton is attached as **EXHIBIT K**.
7. A true and correct copy of a July 1, 2011 salary letter from Dennis Shields, Chancellor, to Dr. Burton is attached as **EXHIBIT L**.
8. A true and correct copy of a June 8, 2012 salary letter from Dennis Shields, Chancellor, to Dr. Burton is attached as **EXHIBIT M**.
9. A true and correct copy of a June 8, 2012 letter from Dennis Shields, Chancellor, to Dr. Burton informing Dr. Burton of her promotion to Associate Professor is attached as **EXHIBIT N**.
10. A true and correct copy of a March 13, 2014 memo from Elizabeth Throop, Dean of the College of Liberal Arts & Education, to Mittie Den Herder, Provost, requesting a salary equity adjustment for Dr. Burton is attached as **EXHIBIT O**.

11. A true and correct copy of a March 26, 2014 letter from Dennis Shields, Chancellor, to Dr. Burton granting a base salary increase to \$56,000.00 per year is attached as **EXHIBIT P**.
12. A true and correct copy of an August 1, 2011 request by Dr. Burton for summer appointment in excess of two ninths of her annual salary signed by the department chair, dean, and provost is attached as **EXHIBIT Q**.
13. A true and correct copy of a request by Dr. Burton for additional payment for teaching a course in domestic terrorism for the spring semester of 2012 is attached as **EXHIBIT R**.
14. A true and correct copy of a May 11, 2012 memo from Laura Anderson, Dean of the College of Liberal Arts & Education, to Dr. Burton regarding payment for 2012 summer internships is attached as **EXHIBIT S**.
15. A true and correct copy of a request by Dr. Burton for additional payment for teaching a course in cybercrime in the spring of 2013 is attached as **EXHIBIT T**.
16. A true and correct copy of an authorization for additional payment for Dr. Burton for teaching a distance learning course in the spring of 2013 is attached as **EXHIBIT U**.
17. A true and correct copy of a summary of Aric Dutelle's appointment and promotion dates, basic demographic information, and salary is attached as **EXHIBIT V**.
18. A true and correct copy of a June 13, 2008 salary letter from David Markee, Chancellor, to Aric Dutelle is attached as **EXHIBIT W**.

19. A true and correct copy of a July 17, 2009 salary letter from David Markee, Chancellor, to Aric Dutelle is attached as **EXHIBIT X**.
20. A true and correct copy of the February 8, 2010 probationary faculty appointment letter to Aric Dutelle is attached as **EXHIBIT Y**.
21. A true and correct copy of the Position Search Form 5- Contract Request for Aric Dutelle is attached as **EXHIBIT Z**.
22. A true and correct copy of the July 1, 2011 salary letter from Dennis Shields, Chancellor, to Aric Dutelle is attached as **EXHIBIT AA**.
23. A true and correct copy of the June 8, 2012 salary letter from Dennis Shields, Chancellor, to Aric Dutelle is attached as **EXHIBIT BB**.
24. A true and correct copy of the May 3, 2012 letter from Mittie Nimocks Den Herder, Provost and Vice Chancellor, to Aric Dutelle regarding temporary salary adjustment due to a Prior Learning Assessment Grant is attached as **EXHIBIT CC**.
25. A true and correct copy of the March 15, 2013 salary letter from Mittie Nimocks Den Herder, Provost and Vice Chancellor, to Aric Dutelle is attached as **EXHIBIT DD**.
26. A true and correct copy of the August 28, 2013 letter from Mittie Nimocks Den Herder, Provost and Vice Chancellor, to Aric Dutelle, regarding a temporary salary adjustment for additional duties related to the Prior Learning Assessment grant is attached as **EXHIBIT EE**.
27. A true and correct copy of the September 24, 2013 salary letter from Dennis Shields, Chancellor, to Aric Dutelle is attached as **EXHIBIT FF**.

28. A true and correct copy of the December 13, 2013 salary letter from Mittie Nimocks Den Herder, Provost and Vice Chancellor, to Aric Dutelle, regarding an equity adjustment is attached as **EXHIBIT GG**.

29. A true and correct copy of the August 23, 2013 limited appointment letter for Aric Dutelle as Interim Director of Sponsored Programs is attached as **EXHIBIT HH**.

30. A true and correct copy of the August 23, 2013 letter from Dennis Shields, Chancellor, to Aric Dutelle offering him an appointment as an Interim Director of Sponsored Programs is attached as **EXHIBIT II**.

31. A true and correct copy of a May 19, 2014 letter from Dennis Shields, Chancellor, to Aric Dutelle accepting Dutelle's resignation is attached as **EXHIBIT JJ**.

32. A true and correct copy of Lorne Gibson's appointment and promotion dates, basic demographic information, and salary is attached as **EXHIBIT KK**.

33. A true and correct copy of the March 16, 2011 probationary faculty appointment letter for Lorne Gibson is attached as **EXHIBIT LL**.

34. A true and correct copy of the Position Search Form 5- Contract Request for Lorne Gibson is attached as **EXHIBIT MM**.

35. A true and correct copy of the June 8, 2012 salary letter from Dennis Shields, Chancellor, to Lorne Gibson is attached as **EXHIBIT NN**.

36. A true and correct copy of May 3, 2012 letter from Mittie Nimocks Den Herder, Provost and Vice Chancellor, to Lorne Gibson regarding a temporary

salary adjustment to the Prior Learning Assessment grant is attached as **EXHIBIT OO**.

37. A true and correct copy of the September 24, 2013 salary letter from Dennis Shields, Chancellor, to Lorne Gibson is attached as **EXHIBIT PP**.

38. A true and correct copy of the October 16, 2014 salary letter from Dennis Shields, Chancellor, to Lorne Gibson is attached as **EXHIBIT QQ**.

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY THAT THE STATEMENTS IN THIS DECLARATION ARE TRUE AND CORRECT AND BASED UPON MY PERSONAL KNOWLEDGE.

Dated November 9, 2015.

/s/Janelle A. Crowley, Ph.D.

Janelle A. Crowley