

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
AT COVINGTON

NANCY LEIDNER)
PLAINTIFF,)
vs.) CIVIL ACTION NO. 07-CV-197-DLB
)
JANET NAPOLITANO)
DEFENDANT,)

AFFIDAVIT OF FAM C.S. (name withheld from public)

- I, C.S, having been duly cautioned and sworn, states as follows:
1. That I currently live in Prospect, Kentucky.
 2. That I was employed as a Federal Air Marshal (“FAM”) at the Cincinnati Field Office from November, 2002, to the present, and I am a co-worker of Nancy Leidner.
 3. I was named a witness in her EEO case and gave a statement to TSA investigators in in early, 2007, which confirmed that Nancy Leidner was subject to rumors being circulated about her EEO filing.
 4. Since I have participated as a witness, I have been subject to ongoing Retaliation and intimidation from Cincinnati Field office management.
 5. I have been called into meetings with investigators at least six times to discuss my involvement with Nancy Leidner’s EEO case.
 6. On Tuesday, July 27, 2009, I was in a meeting at Cincinnati Field Office with my peers when my ATSAC came to publicly get me to meet with two TSA criminal investigators from Detroit Field Office to discuss Ms. Leidner.

7. During this meeting with Criminal investigators which lasted over three hours, I received pressure to change my testimony that I gave on behalf of Ms. Leidner, and received the following threats:
 - a. I was asked if I now wanted to change my statement about Ms. Leidner to match another Witness's negative statement against Ms. Leidner claim.
 - b. I was also threatened with criminal charges for any lies that I gave them about Nancy Leidner.
 - c. I was instructed to sign a statement that I did not write myself about Nancy Leidner's case.
 - d. I was asked whether I had a sexual relationship with Nancy Leidner.
 - e. I was informed by the TSA investigators in reference to something to the effect that after they were done with my interviewe they could go and meet with my wife and Family to discuss my alleged relationship or facts about FAM Leidner.
8. On Friday, August 21, 2009, while at the TSA Cincinnati Field office, I was once again, called publicly into a meeting with TSA criminal investigators to discuss issues related to FAM Nancy Leidner's EEO claim and Federal Lawsuit and was informed that I would be charged/faced with discipline with breaking a non-disclosure agreement that I was forced to sign and refused a copy of.
9. During this August 21st interrogation that lasted over an hour, I was asked what FAM Nancy Leidner promised me or held against me so that I

would testify in her lawsuit the way that I have and also threatened with discipline, up to termination.

10. On November 17, 2009, I truthfully gave my deposition in this matter and I have since filed my own EEO retaliation complaint with TSA.
11. I continue to face retaliation and intimidation from management in my field office. I was recently placed on a flight schedule require me to fly twelve days in row with rotating times and some extremely long shifts including some hours without pay. I believe that Cincinnati management is continuing and will continue to place to resign and/or change my statements.

_____(Signed-Original filed under Seal)_____
C.S.

STATE OF KENTUCKY)

COUNTY OF KENTON)

Subscribed and sworn to by
Notary Public, on this 11th day of January, 2010.

before me, a

_____(signed)_____
NOTARY PUBLIC
MY COMMISSION EXPIRES:
_____1-05-13_____