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8 Attorney for Plaintiff Alison N. Terry

9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

| | | | |
|----|-----------------------------------|---|--------------------------------------|
| 11 | ALISON N. TERRY, |) | CIVIL NO. 06-CV-1459 JAH(CAB) |
| 12 | |) | |
| 13 | Plaintiff, |) | |
| 14 | |) | DECLARATION OF SUMAIYAH |
| 15 | v. |) | ALAZZAWI SUPPORT OF |
| 16 | |) | PLAINTIFF'S OPPOSITION TO |
| 17 | CITY OF SAN DIEGO, and DOES 1-20, |) | DEFENDANT CITY OF SAN |
| 18 | |) | DIEGO'S MOTION FOR |
| 19 | Defendants. |) | SUMMARY JUDGMENT |
| 20 | |) | |
| 21 | |) | Judge: Hon. John A. Houston |
| 22 | |) | Courtroom: 11m 2 nd Floor |
| 23 | |) | Date: October 9, 2008 |
| 24 | |) | Time: 2:30 p.m. |
| 25 | |) | Complaint filed: June 20, 2006 |

26 I, Sumaiyah Alazzawi declare as follows:

27 1. I am a former employee of the City of San Diego ("City"). I have personal
28 knowledge of the matters stated herein and if called to do so could testify competently thereto.

29 2. I was employed by the City as a Lifeguard I from 2001 through 2005. I left
30 because I was sexually harassed by a male lifeguard supervisor, and then retaliated against by not
31 being scheduled for work. I was very, very, disappointed to leave my job because I wanted to
32 make a career of being a lifeguard.

33 3. Each year, all lifeguards receive a performance review and a performance rating.
34 Until 2003, the highest rating was "outstanding." In 2004, the highest rating was changed to

1 "commendation."

2 4. I was aware that receiving less than an outstanding rating would make promotion
3 difficult if not impossible. My Lifeguard I peers were also aware of this.

4 5. During my experiences as a lifeguard, I strongly believe female lifeguards do not
5 receive the same opportunities as men. Often times it is a difficult place to work because sexual
6 harassment by male lifeguards is not taken seriously. Females who complain, including me, are
7 retaliated against, and many females have left the lifeguard service for this reason.

8 6. I did not want to make a complaint regarding the sexual harassment I suffered
9 because I had observed how badly Erin Snow-Creagan had been retaliated against when she
10 complained.

11 7. However, after two years of repeated harassment by my male lifeguard
12 supervisor, I made a complaint in 2005. As a direct result of my complaint I was retaliated
13 against by not being allowed to work available after-season hours which I was entitled to work
14 because of my seniority.

15 8. Captain Wurts had personal knowledge of the retaliation and to my knowledge
16 did not do anything about it.

17 9. Although I was very interested in trying to promote to Lifeguard II, I was never
18 told about taking courses called PC832 or SRT1 or SRT2, and in fact I never even heard of them.

19 10. I subsequently filed a lawsuit against the City which settled for \$200,000 in
20 October, 2006. A portion of the settlement required the City to "institute mandatory annual
21 training for all lifeguards to reinforce policies prohibiting retaliation, with the training to be
22 conducted by an outside, neutral trainer."

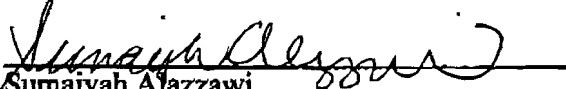
23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 Executed this 19th day of September, 2008, at Minneapolis, Minnesota.

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Sumaiyah Alazzawi