

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**LATOYA WATSON**

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Plaintiff,

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v.

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Civil Action No. 1:21-cv-02251-TJK

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**CNN AMERICA INC**

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**TARA YOUNG**

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Defendants.

**ANSWER TO COMPLAINT**

COMES NOW Defendant CNN America Inc. and Defendant Tara Young (collectively “Defendants”) by and through undersigned counsel, and present this Answer to the Complaint.

1. This is a civil action arising out of discrimination and retaliation on the basis of race, specifically the creation and maintenance of a discriminatory, retaliatory and hostile working environment, by Defendants CNN America Inc. and Tara Young, in the course of the employment of Plaintiff Latoya D. Watson.

**ANSWER:** Defendants admit that Plaintiff brings this action alleging discrimination and retaliation. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 1 of the Complaint.

2. This action is brought under the District of Columbia Human Rights Act, D.C. Code § 2-1401.01 et seq., and under the common law of the District of Columbia.

**ANSWER:** Defendants admit that Plaintiff brings this action alleging violations of the District of Columbia Human Rights Act and under the common law of the District of Columbia. Except as specifically admitted Defendants deny each and every remaining allegation contained in Paragraph 2 of the Complaint.

### **PARTIES**

3. Plaintiff Latoya D. Watson (“Ms. Watson”) is a resident and citizen of the District of Columbia. At all times relevant hereto, Ms. Watson was employed by CNN America Inc. in the District of Columbia as the Supervisor , and then Manager, of Hair & Makeup in the D.C. Hair & Makeup Division of CNN America Inc.

**ANSWER:** Upon information and belief, admitted.

4. Defendant CNN America Inc. (“CNN”) is a foreign corporation registered to do business and in good standing in the District of Columbia, and which maintains an agent for service of process in the District of Columbia.

**ANSWER:** Admitted.

5. Defendant Tara Young (“Ms. Young”) is a resident and citizen of the State of Georgia. At all times relevant hereto, Ms. Young was (and is) the Director of CNN Hair & Makeup, with direct supervisory authority over Ms. Watson in the District of Columbia.

**ANSWER:** Admitted.

**JURISDICTION AND VENUE**

6. This Court has jurisdiction over Ms. Watson's claims under the common law of the District of Columbia.

**ANSWER:** The allegations in Paragraph 6 of the Complaint are legal conclusions to which no response is required. To the extent any further response is required, denied.

7. The amount in controversy exceeds the jurisdictional minimum amount for this Court.

**ANSWER:** The allegations in Paragraph 7 of the Complaint are legal conclusions to which no response is required. To the extent any further response is required, denied.

8. CNN is an "employer" within the meaning of D.C. Code § 2-401.02(10).

**ANSWER:** Admitted.

9. CNN is present in and conducts business in the District of Columbia, and is subject to the personal jurisdiction of this Court.

**ANSWER:** Admitted.

10. CNN is Ms. Watson's "employer" within the meaning of D.C. Code § 2-1401.02(10).

**ANSWER:** Admitted.

11. At all times relevant hereto, CNN was (and is) present in, and conducted business in, the District of Columbia, and therefore is subject to the personal jurisdiction of this Court.

**ANSWER:** Admitted.

12. Defendant Tara Young was (and is) employed as a managerial and supervisory employee of CNN, and at all times relevant hereto, was Ms. Watson's direct supervisor.

**ANSWER:** Admitted.

13. The tortious acts alleged in this Complaint were committed in the District of Columbia.

**ANSWER:** Defendants admit that the allegations Plaintiff makes in the Complaint purportedly occurred in the District of Columbia, but deny that any tortious acts actually occurred. Except as specifically admitted, denied.

14. Jurisdiction and venue are proper in this Court.

**ANSWER:** Admitted.

### **BACKGROUND**

15. Ms. Watson is African-American (black).

**ANSWER:** Upon information and belief, admitted.

16. Ms. Watson was hired by CNN in May, 2004 as a freelance Hair & Makeup artist in Atlanta, Georgia. In 2006, Ms. Watson was hired as a full time CNN hair and makeup artist

based in Los Angeles, California. In 2007 Ms. Watson was promoted to Senior Hair & Makeup Artist, and in 2011, she relocated back to CNN Atlanta in the same role.

**ANSWER:** Denied.

17. In the Spring of 2016, Ms. Watson applied for, and received a promotion to the Supervisor Hair & Makeup role based in Washington, D.C. In July 2019, Ms. Watson was promoted to Manager, Hair & Makeup. Ms. Young was the hiring manager for all roles held by Ms. Watson.

**ANSWER:** Admitted.

18. At all times throughout her employment Ms. Watson performed her job in an exemplary manner, as evidenced by her track record of promotions, and her performance reviews.

**ANSWER:** Denied.

19. Ms. Watson's 2016, Performance Recap stated, "2016 was an exceptional year for you and CNN. You transitioned from an artist to a supervisor with ease, needing little direction. . . . You're committed to excellence and go above and beyond to meet the business demands and achieve success both personally and professionally." Other comments that year included, "you have an innate desire to improve," "[y]ou are a great listener," "[y]ou wholeheartedly address each situation that needs attention immediately," "[y]ou offer smart solutions," and [y]ou have built great relationships."

**ANSWER:** Admitted that Plaintiff received a performance evaluation and that Paragraph 19 purports to quote to portions of that document. The content of the document speaks for itself.

Defendants deny the remaining allegations in Paragraph 19 of the Complaint to the extent they attempt to misstate, mischaracterize, or misquote the language of the document.

20. Ms. Watson's 2017 Performance Recap stated, "2017 was your 1st full year in the supervisory role and it was outstanding, for you and the DC H&MU team." Other comments included, "You ... have the team performing at a remarkably higher level. Your energy, work ethic, and clear direction has transformed the team , a true reflection of your positive, influential coaching skills. The H&MU team overall had one of the brightest, encouraging results in the Cultural Survey, a good reflection of your contribution and leadership in D.C.... You are the voice of your team and have raised the bar for DC and will be a valued partner in 2018."

**ANSWER:** Admitted that Plaintiff received a performance evaluation and that Paragraph 20 purports to quote to portions of that document. The content of the document speaks for itself. Defendants deny the remaining allegations in Paragraph 20 of the Complaint to the extent they attempt to misstate, mischaracterize, or misquote the language of the document.

21. Ms. Watson's stellar performance continued into 2018 , with comments including, "2018 was another great year for you, and accordingly the DC H&MU Team. Your relentless commitment to managing performance...was rewarding. Your ability to mediate peer to peer conflict to improve working relations and productivity is admirable."

**ANSWER:** Admitted that Plaintiff received a performance evaluation and that Paragraph 21 purports to quote to portions of that document. The content of the document speaks for itself. Defendants deny the remaining allegations in Paragraph 21 of the Complaint to the extent they attempt to misstate, mischaracterize, or misquote the language of the document

22. Ms. Watson's performance continued to shine in 2019. "2019 started with a bang and the momentum never stopped.... [y]ou were able to hire, train, and retain an additional 14 talented artists, a big win for DC....With you at the helm, the on-air product was exceptional and our department contributions were seamless. You have continued to build your brand as a leader. Your leadership skills and ability to connect with your partners, created the opportunity to become an advisor on the newly established DC chapter of Turner Women."

**ANSWER:** Admitted that Plaintiff received a performance evaluation and that Paragraph 22 purports to quote to portions of that document. The content of the document speaks for itself. Defendants deny the remaining allegations in Paragraph 22 of the Complaint to the extent they attempt to misstate, mischaracterize, or misquote the language of the document

23. Before accepting the position as Supervisor Hair & Makeup for the D.C. bureau, Ms. Watson attempted to negotiate a higher salary than the one being offered, to compensate for the significant cost of living in the D.C. area as compared to Atlanta. Her request was denied. Ms. Watson also requested relocation package and short term temporary housing while she looked for a place to live, and that request was also denied. Ms. Watson was given two weeks to relocate and start her new role.

**ANSWER:** Denied.

24. On information and belief, Ms. Watson's Caucasian counterpart Julie Meads ("Ms. Meads"), CNN Hair & Makeup Manager in New York, was hired in 2012 at a higher salary than Ms. Watson was receiving at the time. When Ms. Watson and Ms. Meads were both promoted by

Ms. Young (who is Caucasian) from Supervisor to Manager of their respective Hair & Makeup departments, Ms. Watson commented on a conference call that she was excited to finally receive a pay bump after asking for (and not receiving) one quarterly from 2016-2020. Ms. Meads stated that she was not getting much of an increase because she was “already there.”

**ANSWER:** Admitted that Ms. Meads was promoted to Manager of her respective Hair & Makeup department. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 24 of the Complaint.

25. Unlike Ms. Watson, Ms. Meads is not actually a hair and makeup artist - in other words, Ms. Meads does not “do” hair or have hair experience, and she did not have media experience prior to being brought on as Supervisor. Ms. Watson was paid less than Ms. Meads, despite being more qualified and having more experience, because of her race.

**ANSWER:** Admitted that Ms. Meads does not “do hair”. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 25 of the Complaint.

26. In her position as Manager, Ms. Watson inherited a team of five Black artists, and two Latino artists.

**ANSWER:** Admitted.

27. During the time frame mid-2017 - October 2019, on several occasions, Ms. Young stated during phone conferences and in person that Ms. Watson needed to “hire some white girls” in D.C. and “change the D.C. culture.” Ms. Young repeated this statement on HMU management



meeting calls with Ms. Meads (Ms. Watson's NY counterpart) present, and in person at a work dinner.

**ANSWER:** Denied.

28. Ms. Watson was completely taken aback and offended by Ms. Young's extremely discriminatory statement, which she repeated on numerous occasions. Ms. Watson shared Ms. Young's remarks with a work colleague, Tiffany Bullock (DC Senior Hair & Makeup Artist).

**ANSWER:** Defendant is without knowledge or sufficient information to admit or deny Plaintiff's feelings. To the extent a further response is required, denied.

29. Ms. Watson also shared this statement with Boz Ul-Haque (Senior HR Business Partner) while at the Sugar Factory for an after work meet up.

**ANSWER:** Denied.

30. During the Spring of 2018, while at lunch with Ms. Young, Ms. Meads, and Maureen Dumond (HR), Ms. Watson brought up Ms. Young's statements about Ms. Watson needing to hire "white girls", pointing out that all other bureaus had the reverse demographic (in other words, predominantly white/Caucasian staff) but no one had questioned or requested that demographic be changed.

**ANSWER:** Denied.

31. In or around June 2018, Ms. Young arranged for a Caucasian artist (a former employee and former hire of Ms. Young), Michelle Smith ("Ms. Smith"), to relocate to D.C. as a

freelance artist. Ms. Young then pressured Ms. Watson to hire Ms. Smith for a full-time role, which she did in October 2018 when a position became available.

**ANSWER:** Admitted that Ms. Smith was freelance and in 2018, she worked in Washington, D.C. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 31 of the Complaint.

32. Then, when a Senior Artist role opened in February 2019, Ms. Young pressured Ms. Watson on several occasions, including on calls with Ms. Meads, to promote Ms. Smith into the position. After Ms. Watson informed Ms. Young that she intended to promote Tiffany Bullock (black/African American) to the position, Ms. Young attempted to persuade Ms. Watson to promote Ms. Smith, stating that she had solicited “professional input” from her friend/life coach, Haleh Gianni, regarding who should receive the promotion, and that Ms. Gianni could make certain determinations about people “just by looking at them.”

**ANSWER:** Denied.

33. Ms. Young then texted Ms. Watson and suggested restructuring to create a job share position for Ms. Smith. This was the first, and only, time such an arrangement had ever been discussed during Ms. Watson’s time in a management role.

**ANSWER:** Denied.

34. Despite the fact that Ms. Watson is responsible for hiring in D.C., in addition to pressuring Ms. Watson to hire Ms. Smith, Ms. Young also pressured and intimidated Ms. Watson into hiring another Caucasian artist, Emily Oldham (“Ms. Oldham”).

**ANSWER:** Denied.

35. In May 2019, Ms. Young told Ms. Watson about an Atlanta based freelancer (Emily Oldham) that she was attempting to persuade to move to D.C. Ms. Young further said that on May 24, 2019, Ms. Oldham was visiting D.C. at CNN's expense. This is in stark contrast to how Ms. Watson was treated when relocating to D.C.

**ANSWER:** Admitted that Ms. Oldham was a freelancer. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 35 of the Complaint.

36. After Ms. Oldham relocated to the D.C. area in October 2019, Ms. Young pressured Ms. Watson to hire Ms. Oldham for a permanent role when one opened in January 2020.

**ANSWER:** Denied.

37. In January 2020, Ms. Young increased Ms. Smith's salary significantly more than other non-white artists despite Ms. Watson's requests to evenly increase all salaries. Ms. Young expressed concern and interest in Ms. Smith's salary more than others, and even followed up to check to see if "Michelle and others" received an increase.

**ANSWER:** Denied.

38. Two other hair and makeup artists, both African-American/Black (Latavia Lewis & Ebony McGee), both earned less than Ms. Smith, and did not receive comparable increases even though their performance was similar and, in some areas, stronger.

**ANSWER:** Denied.

39. On or around March 23, 2020, with the worldwide emergence and spread of the Covid-19 pandemic, CNN closed its offices. At that time, the entire staff transitioned to working remotely from home, on projects created and assigned by Ms. Watson, Ms. Young and Ms. Meads.

**ANSWER:** Admitted.

40. During August 2020, Ms. Watson, Ms. Meads, and Ms. Young had numerous conversations centering on assessments to determine which artists would be laid permanently off as a result of the Covid-19 pandemic. Ms. Young challenged Ms. Watson's choices and asked about bringing Ms. Smith back, and inquired as to how Ms. Smith ranked compared to others.

**ANSWER:** Admitted that Ms. Watson, Ms. Meads, and Ms. Young had conversations regarding possible lay-offs due to COVID-19. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 40 of the Complaint.

41. Ultimately, Ms. Smith was laid off, but Ms. Young has commented that she will hire Ms. Smith back when/if given the chance. Ms. Young has not made similar comments about any other artist who was laid off. Ms. Smith was the only Caucasian artist from Ms. Watson's team to be laid off.

**ANSWER:** Admitted that Ms. Smith was laid off. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 41 of the Complaint.

42. Ms. Young did not treat Ms. Meads in a similar manner, did not second guess Ms.

Meads' hiring/lay off decisions, or pressure Ms. Meads to hire certain individuals for the New York bureau.

**ANSWER:** Denied.

43. Since the time Ms. Watson became Supervisor in 2016, and continuing throughout her tenure as Manager, Ms. Watson was frequently asked to report to work and do hair and makeup for Erin Burnett and others. Actually performing hair and makeup service is not part of Ms. Watson's job description; she is responsible for managing the artists that provide the hair and makeup services for the on-air talent.

**ANSWER:** Defendants admit that Ms. Watson is responsible for managing the artists that provide hair and makeup services for on-air talent. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 43 of the Complaint.

44. Significantly, Ms. Watson's Caucasian counterpart, Ms. Meads, has never been asked to or required to provide hair and makeup services.

**ANSWER:** Denied.

45. Throughout the 2018-2020 time period, Ms. Young openly made comments about the fact that her bi-racial daughter only identifies as black. Ms. Young stated on several occasions that she had to remind her daughter that "she's white, too." Ms. Young made these comments in the presence of Ms. Watson, Ms. Meads and others, including at work dinners - and most recently in Atlanta at Barcelona restaurant with Stephanie Bennett (former CNN Atlanta Senior Artist) and

once at Farmer's and Distillers in Washington, D.C. with her daughter and her daughter's two friends present.

**ANSWER:** Denied.

46. On June 2, 2020, during a conference call between with Ms. Young, Ms. Meads, and Roland Tram, Ms. Watson asked, on behalf of her team, about the policy regarding posting #BLACKLIVESMATTER on social media- if her team was permitted to participate in the protests. Ms. Young immediately responded , “no,” stating that “black lives matter” is “an opinion,” which is “controversial,” and which constitutes a “political statement.” Ms. Watson was shocked, and extremely offended, by Ms. Young’s statement that “black lives matter” is a controversial, political opinion. Ms. Watson pointed out that as a company, CNN has supported human rights by sponsoring gay rights initiatives and asked why this was any different. Mr. Tram interceded in the discussion, promising to find out the official policy for posting/participating in protests, and would let us know.

**ANSWER:** Admitted that Plaintiff inquired about policies related to the Black Lives Matter movement. Admitted that CNN supports human rights initiatives. Admitted that Mr. Tram told Plaintiff he would provide CNN’s policy. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 46 of the Complaint.

47. On August 14, 2020, Ms. Young notified Ms. Watson and Ms. Meads that they would be required to create “attributes” to be used to assess their team members in order to identify the top performers who would be brought back to work. The remaining employees would be laid off. Together, Ms. Watson and Ms. Meads developed the “attributes” to be used for assessment.

Ms. Young made a few adjustments, submitted the plan to HR, and then returned the approved “attributes” plan to Ms. Watson and Ms. Meads for use in ranking their team members. Ms. Watson was told that her top three performers would return to CNN.

**ANSWER:** Admitted that on or about August 14, 2020, Ms. Young notified Ms. Watson and Ms. Meads that they would need to assess their team members in order to determine who would be brought back to work. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 47 of the Complaint.

48. On August 26, 2020, Ms. Young informed Ms. Watson and Ms. Meads that they would likely be returning to their respective bureaus soon, and should start preparing in anticipation of returning.

**ANSWER:** Admitted.

49. On August 28, 2020, Ms. Watson was instructed to provide hair and makeup services to Senior White House Correspondent Pamela Brown (“Ms. Brown”) in bureau prior to approval being received for staff to return to the bureau offices - the hair and makeup studios had been closed since March 23, 2020 due to Covid.

**ANSWER:** Denied.

50. Although the studios did not reopen until September 8, 2020, Ms. Watson was still required to report to the bureau premises to provide hair and makeup services for Pamela Brown. No one else within the department was asked to do the same.

**ANSWER:** Denied.

51. On that same day, Ms. Young announced that Ms. Watson and Ms. Meads would officially be reopening their respective studios with the top performers as previously identified. Ms. Young further told Ms. Watson that she should personally plan to do the hair and makeup for Ms. Brown during the week of August 31 since they had not received final approval from HR for the official re-opening. Performing hair and makeup services was not part of Ms. Watson's job description as a Manager, and was not asked of any other manager, particularly Ms. Watson's Caucasian counterpart, Ms. Meads.

**ANSWER:** Admitted that, during the week of August 31, Ms. Young told Plaintiff to plan to do the hair and makeup for Ms. Brown. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 51 of the Complaint.

52. During the week of August 31, 2020, Ms. Watson was in the bureau preparing for the reopening. She scheduled appointments for the week with Ms. Brown for hair and makeup.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the facts contained in Paragraph 52 of the Complaint, and accordingly deny the same.

53. On Tuesday, September 1, 2020, staff received an email announcing the limited reopening of the studios, and that those receiving the email would not be returning to the bureau but would continue to work from home.

**ANSWER:** Admitted that on Tuesday, September 1, 2020, staff received an email related to the reopening of the studios. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 53 of the Complaint.



54. That evening, Ms. Watson received a text message from Anchor Brianna Keilar (“Ms. Keilar”) (Caucasian) stating that she had heard that the hair and makeup artists were returning to the bureau.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 54 of the Complaint, and accordingly deny the same.

55. On Wednesday, September 2, 2020, after CNN on-air talent was notified of the limited re-opening, when Ms. Watson spoke by phone to Ms. Keilar, Ms. Keilar asked if Valeska Williams (“Ms. Williams”) (Caucasian/Swedish) (Ms. Keilar’s and Ms. Brown’s friend and personal hairstylist, who is also a staffed hair & makeup artist with CNN) was returning. Ms. Watson told Ms. Keilar that Ms. Williams would not be returning at that time. When Ms. Keilar asked why, Ms. Watson informed her that many factors went into the decision, but that she could not discuss the details. Ms. Watson told Ms. Keilar that Latavia Lewis (“Ms. Lewis”), a returning CNN hair & makeup artist, would be accommodating her hair and makeup needs going forward. Ms. Lewis is black/African American.

**ANSWER:** Defendants deny that Ms. Williams is Caucasian/Swedish. Defendants are without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 55 of the Complaint, and accordingly deny the same. Except as specifically admitted, denied.

56. When Ms. Keilar emphasized how healthy her hair had been since she had been doing it herself during Covid, Ms. Watson assured her that Ms. Lewis would maintain the health

of her hair and that she was fully equipped to deliver both hair and makeup equally. Ms. Keilar said she understood and stated that Ms. Lewis “does a mean blowout.” She agreed to having Ms. Lewis do hair and makeup at the onset of the reopen and to give her a try.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 56 of the Complaint, and accordingly deny the same.

57. On September 3 and 4, 2020, while Ms. Watson was providing hair and makeup services to Ms. Brown, Ms. Brown asked if Ms. Williams would be returning. When Ms. Watson responded that Ms. Williams would not be returning at that time, Ms. Brown expressed her desire for Ms. Williams to return. She asked how the decisions were made to determine who returned, and Ms. Watson said she made decisions based on the needs of the business and would not go into further detail.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 57 of the Complaint, and accordingly deny the same.

58. On September 4, 2020, as Ms. Watson was doing Ms. Brown’s makeup, Ms. Brown received a phone call from Virginia Mosely (“Ms. Mosely”). Ms. Watson could only hear one side of the conversation, but heard Ms. Brown say, “Valeska [Williams]... yes, I agree.. Latoya ... I’m here and she’s doing me now...”

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 58 of the Complaint, and accordingly deny the same.

59. On Monday, September 7, 2020, Ms. Watson texted Ms. Keilar to confirm her appointment time for the next day. Ms. Keilar said she needed time to “think about” whether she wanted Ms. Lewis to do her hair and makeup.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 59 of the Complaint, and accordingly deny the same.

60. The next day, Ms. Keilar called Ms. Watson and requested to have Ms. Williams for her hair and makeup. She said it was a “matter of comfort” since she knew, “for a fact” that Ms. Williams was not around people other than those in her home. Ms. Keilar made this statement despite the fact that Ms. Williams was at the time, working three to four days in a salon with clients. Ms. Keilar said she would continue to do her own hair and makeup if Ms. Williams was not brought back. Ms. Keilar again questioned how Ms. Watson had determined who would be brought back, and Ms. Watson again responded that she made her decisions based on business needs and would not go into detail.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 60 of the Complaint, and accordingly deny the same.

61. On Thursday, September 10, 2020, Ms. Watson received an email from Shawn Giangeruso (“Mr. Giangeruso”), the Director of Talent Recruitment and Dev. Recruiting asking if she had time to speak. When they spoke later that day, Mr. Giangeruso questioned Ms. Watson as to how she had decided which artists to bring back. He asked specifically, “who works with Pamela Brown and Brianna Keilar?” As Manager of her department, with staffing and hiring responsibilities, Ms. Watson again stated that her decisions were made based on business needs

and that she would not go in to detail. Ms. Watson later learned that Mr. Giangeruso had first contacted Ms. Meads to get information about D.C.'s staffing, despite the fact that Ms. Watson managed D.C., and not Ms. Meads.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 61 of the Complaint, and accordingly deny the same.

62. On Tuesday, September 15, 2020, Ms. Young sent a text message instructing Ms. Watson and Ms. Meads to create Excel spreadsheets indicating which of their team members were staying or being let go, and the justifications for each decision. Ms. Young texted, "Entelis [Executive VP for Talent and Content Development] is meddling."

**ANSWER:** Denied.

63. Later that day, during a call, Ms. Young shared that Paul Crum ("Mr. Crum") (Vice President - News Operations, Business Administration & Affiliate Services,) was due to meet with Amy Entelis ("Ms. Entelis") to discuss why Ms. Williams had not been brought back. Ms. Young assured Ms. Watson that Mr. Crum had explained to Ms. Entelis that he trusted his management teams' decisions and that they were final.

**ANSWER:** Denied.

64. On Wednesday, September 16, 2020, Ms. Young texted Ms. Watson and Ms. Meads, "Hot off the press - Greene is now questioning why Valeska is not returning. Looks like Entelis wasn't happy with Paul's explanation." "Greene" refers to Lisa Greene, Executive Vice President and Chief Human Resources Officer, Warner Media News & Sports.

**ANSWER:** Denied.

65. Ms. Young also shared that Ms. Williams had filed a complaint against Ms. Watson, alleging favoritism. Ms. Watson vehemently denied the accusations, assured Ms. Young the claims were false, and stated that she felt she was being retaliated against for not bringing Ms. Williams (a personal friend of Ms. Keilar and Ms. Brown) back.

**ANSWER:** Denied.

66. Ms. Young stated said that she was not supposed to have told Ms. Watson about the complaint, and asked her not to mention to anyone that she shared those details.

**ANSWER:** Denied.

67. In mid-September, during a phone conversation with Ms. Meads, Ms. Watson expressed her frustration with Ms. Young pressuring her to retain Michelle Smith (Caucasian), the freelancer she was pressured to hire, who did not have the same skill level as the top performers.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 67 of the Complaint, and accordingly deny the same.

68. On Tuesday, September 22, 2020, Ms. Young informed Ms. Watson that Ms. Williams would be returning with the group of non-impacted employees. She said Jeff Zucker (President CNN) personally reversed the decision made by Ms. Watson, “it is what it is,” and that Ms. Williams needed to be trained, “ASAP.”

**ANSWER:** Admitted that Ms. Young informed Ms. Watson that Ms. Williams would be returning. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 68 of the Complaint.

69. Ms. Watson objected, and told Ms. Young that the action was unethical, unfair, and against company protocol and further, opened CNN up to liability claims since Ms. Williams, who is white, ranked lower than two other artists per the assessment.

**ANSWER:** Denied.

70. At this point, Ms. Watson was extremely disappointed and frustrated that she was being prevented from doing her job, and that her management decisions, which were based on measurable criteria, were being second guessed, scrutinized and overturned.

**ANSWER:** Denied that Ms. Watson was being “prevented from doing her job” or that her management decisions were being “second guessed, scrutinized and overturned.” Defendants are without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 70 of the Complaint, and accordingly deny the same.

71. Other Managers, who are not black/African American, were not treated in this same manner.

**ANSWER:** Denied.

72. Ms. Watson had previously been touted in her performance reviews as “the voice of the D.C. team,” whose clear direction “transformed the team, a true reflection of your positive,

influential coaching skills,” with a relentless commitment to managing performance” and an “admirable ability” “to mediate peer to peer conflict to improve working relations and productivity.” And, as recently as 2019, “With you at the helm, the on-air product was exceptional.”

**ANSWER:** Admitted that Plaintiff received performance reviews and that Paragraph 72 purports to quote to portions of those documents. The content of the document speaks for itself. Defendants deny the remaining allegations in Paragraph 72 of the Complaint to the extent they attempt to misstate, mischaracterize, or misquote the language of the document.

73. Based on the disparate and unfair treatment she was being subjected to, and because she was now being prevented from doing her job, Ms. Watson requested to be provided with the same severance package that the impacted (laid off) employees were receiving. Ms. Young said she “understood,” conceded that Ms. Watson was correct, and that the actions of CNN in disregarding and overturning her management decisions, and returning Ms. Williams - a Caucasian employee with an inferior skill set than the artists being let go - were “indefensible.” Ms. Young indicated her intent to discuss the matter with Mr. Crum and be back in touch.

**ANSWER:** Admitted that Ms. Watson requested a severance package. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 73 of the Complaint.

74. Ms. Young reiterated her hope that Ms. Watson would not mention that Ms. Young had shared the fact of the HR complaint /investigation with Ms. Watson.

**ANSWER:** Denied.

75. Ms. Watson told Ms. Young that the entire situation had an “undercurrent of race” which has always been present, but which Ms. Watson had not previously raised. Ms. Young conceded, “I can see how you would feel that way.” Ms. Watson told Ms. Young she felt devalued, and that she was not being treated with respect, dignity or integrity - that as the only black Manager in the Division, she was the only manager whose decisions were questioned, and especially at such high levels - reaching Jeff Zucker the President of CNN, which undoubtedly would impact Mr. Zucker’s perception of Ms. Watson as a Manager in his organization.

**ANSWER:** Denied.

76. Ms. Watson expressed that her professional reputation was at risk, and that the work environment had become hostile and intolerable, and that she was constantly undermined, rendering her incapable of fully performing her job.

**ANSWER:** Denied.

77. About 15 minutes after that conversation, Mr. Crum and Ms. Young “group Facetimed” Ms. Watson. Ms. Watson shared the same issues and feelings with Mr. Crum. Mr. Crum called it a “bump in the road” and pledged his support of Ms. Watson “to manage Valeska out.” He asked Ms. Watson to “think about it.”

**ANSWER:** Admitted that Ms. Watson spoke to Mr. Crum. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 77 of the Complaint.



78. Several hours later, Ms. Watson reiterated her request to Ms. Young for a severance package. Ms. Watson emphasized that she was no longer able to do her job without the interference, scrutiny and undermining by several parties, and there was no guarantee that it would not reoccur, since her decisions had been ignored and /or reversed.

**ANSWER:** Admitted that Ms. Watson requested a severance package. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 78 of the Complaint.

79. Ms. Meads called Ms. Watson later that day and offered her full support, stating that she did not want Ms. Watson to leave. Ms. Meads suggested Ms. Watson speak directly to Jeff Zucker. Ms. Watson was taken aback by the level of Ms. Meads' knowledge since Ms. Watson had never had a conversation with her about it, and Ms. Meads had not been a participant on any calls with Ms. Watson about these issues.

**ANSWER:** Admitted that Ms. Meads called Ms. Watson. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 79 of the Complaint.

80. On the morning of September 23, 2020, Ms. Watson spoke with Ms. Young, who shared that Mr. Crum was working on a severance package for Ms. Watson, and that he would share the details with her when it was complete. Ms. Young further stated that she and Ms. Meads would split managing the D.C. bureau, that she hoped to back-fill the position at some point mid next year, and asked if Ms. Watson would consider coming back at that time.

**ANSWER:** Admitted that Ms. Watson and Ms. Young spoke on or about September 23, 2020. Except as admitted, Defendants deny each and every remaining allegation contained in Paragraph 80 of the Complaint.

81. Ms. Young also asked Ms. Watson to create a folder in the shared drive with specific bullets for her and Ms. Meads to reference relating to management of the D.C. studio.

**ANSWER:** Admitted.

82. Shortly thereafter, at around 9:00 a.m., Mr. Crum contacted Ms. Watson via FaceTime and informed her that she was ineligible for severance benefits because he intended to backfill the position at some point in the future. He then shared that he was working on a separation package for Ms. Watson, but that it would be “less robust.” He promised to work to get Ms. Watson “the best package possible” and cautioned that if Ms. Watson had anything negative to say about the situation or the people involved, to “call [him] and [him] only.”

**ANSWER:** Defendants admit that Mr. Crum and Ms. Watson had a conversation about a separation package. Except as specifically admitted, Defendants deny each and every remaining allegation in Paragraph 82 of the Complaint.

83. Mr. Crum reiterated, “Do not to speak to anyone else otherwise you will fuck this up. Do not fuck this up.” In other words, if Ms. Watson voiced her complaints about race discrimination, hostile work environment or retaliation, she would not receive a separation package, having already been denied the same severance package other employees were receiving.

**ANSWER:** Denied.

84. Mr. Crum said he needed a day or two to prepare the package and have it approved, and instructed Ms. Watson to proceed as planned with the upcoming conversations that day regarding layoffs. Ms. Watson agreed, to which Mr. Crum replied, “You’re a real pro and I have so much more respect for you for standing up for what you believe to be right, and your way of operating with integrity.” He further said, “I don't want to lose you, but I support you if you feel it's your time to leave.”

**ANSWER:** Denied.

85. That day, Ms. Watson spoke with all impacted and non-impacted employees, as instructed, sticking to the talking points and telling the artists that decisions on who returned were based on skill level and the business needs.

**ANSWER:** Admitted that on September 23, 2020, Ms. Watson spoke with all impacted and non-impacted employees. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 85 of the Complaint.

86. Anderson Cooper and Cristiane Amanpour requested to have their preferred artist, Yoko Fumoto (Asian), return to Ms. Meads and Roland Tram’s team, but their request was not honored.

**ANSWER:** Defendants admit that Anderson Cooper and Cristiane Amanpour inquired about Yoko Fumoto. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 86 of the Complaint.

87. Ms. Watson was the only black/African American Manager in the Hair & Makeup Division. Everyone who questioned and/or undermined her decisions, or had a role in reversing the decision respecting Ms. Williams, is Caucasian.

**ANSWER:** Defendants admit that Ms. Watson was the only black/African American Manager in the Hair & Makeup Division. Except as specifically admitted, Defendants deny each and every remaining allegation in Paragraph 87 of the Complaint.

88. On September 23, 2020, Ms. Watson sent an email to Jason Kilar (CEO, Warner Media) stating her belief that she was being treated differently based on her race. She included in her complaint that she was often asked to perform hair and makeup services, while other managers were not. Ms. Watson's complaint was forwarded to an outside law firm (Littler) to conduct a third party investigation.

**ANSWER:** Admitted that on or about September 23, 2020, Ms. Watson sent an email to Jason Kilar and that Ms. Watson's email was forwarded for investigation. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 88 of the Complaint.

89. On Friday, September 25, 2020, as Tiffany Bullock (Senior Artist in the D.C. bureau) was styling Ms. Brown's hair, Ms. Bullock sent an email to Amy Entelis and Briana Keilar (directly in Ms. Bullock's line of sight). The subject line was "Valeska" and Ms. Bullock could easily see the text, which read, "We won. Valeska is back and that is a win not only for us but for the entire company."

**ANSWER:** Denied.

90. On Monday, September 28, 2020, Ms. Young told Ms. Watson that her proposed separation package was on “legal and HR’s desks.”

**ANSWER:** Denied.

91. On Monday, October 5, 2020, while on a call with Ms. Young and Ms. Meads, Ms. Watson pointed out that her laptop could be repurposed/reassigned once she departed. They both laughed aloud, and Ms. Young said, “We’re just pretending that that’s not happening.” Ms. Meads said, “You’re not going anywhere, where are you going, on PTO?” Ms. Watson was saddened and disappointed by their reactions, which belittled, and refused to acknowledge, the experience that Ms. Watson was having, and negated and ignored the very real fact that the second guessing, undermining and reversing of Ms. Watson’s management decisions was racially motivated, created an intolerable and hostile environment for Ms. Watson, prevented her from doing her job, and made her feel degraded, devalued and disrespected.

**ANSWER:** Admitted that Ms. Young stated that “we’re just pretending that that’s not happening” and that Ms. Meads shared a similar sentiment. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 91 of the Complaint.

92. On October 9, 2020, Ms. Watson shared her complaint about the layoff process with third party investigator, Josh Bortnick (“Mr. Bortnick”).

**ANSWER:** Admitted that on or about October 9, 2020, Ms. Watson met with Mr. Bortnick. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 92 of the Complaint.

93. On Wednesday, October 21, 2020, Ms. Watson learned from one of her direct reports (Ebony McGee, CNN hair & makeup artist) about a company-wide virtual Town Hall meeting that had been facilitated by Jeff Zucker. Ms. McGee praised the meeting, and said that Jeff Zucker had discussed the layoffs in hair and makeup. Ms. Watson then called Tiffany Bullock (Senior Hair and Makeup Artist), who confirmed that the town hall had taken place, and shared the details of when the invite went out and from whom. Ms. Watson, who had received notifications of town hall meetings in the past, did not receive any communications regarding this particular town hall, even though each of her direct reports did.

**ANSWER:** Defendants are without sufficient knowledge or information to admit or deny the allegations in Paragraph 93 of the Complaint, and accordingly deny the same.

94. Ms. Watson sent a follow-up email to Mr. Bortnick, the third party investigator, to add to her complaint, stating that she felt her exclusion from the town hall was intentional and retaliatory.

**ANSWER:** Defendants admit that Ms. Watson sent an email to Mr. Bortnick. Except as specifically admitted, Defendants deny each and every allegation in Paragraph 94 of the Complaint.

95. On October 26, 2020, Ms. Bullock shared that an appointment request had come through to the distribution list. Ms. Watson had not received the request, and discovered she had been removed from two distributions lists/email chains. Ms. Watson immediately emailed Ms. Young, who claimed she did not know how it had happened.

**ANSWER:** Admitted that Ms. Watson emailed Ms. Young. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 95 of the Complaint.

96. On Tuesday, November 3, 2020, Ms. Watson told Ms. Young that she had reached out to all anchors for appointment needs for election week and that everyone with the exception of Brianna Keilar had responded. Instead, Ms. Keilar had circumvented Ms. Watson and requested her appointments through Ms. Williams, which Ms. Williams then submitted to Ms. Watson. Ms. Watson told both Ms. Young and Mr. Bortnick that this was a further act of retaliation, and was a blatant attempt to prevent her from successfully doing her job.

**ANSWER:** Admitted that Ms. Watson reached out to Ms. Young and Mr. Bortnick. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 96 of the Complaint.

97. On Tuesday, November 17, 2020 during a conference call between Ms. Watson, Ms. Young and Ms. Meads, Ms. Young remarked that Abby Phillip, an African-American, DC based political correspondent, had received a lot of press regarding her coverage of the 2020 election. Ms. Young commented, “She is good, I like her, she’s a cute girl. I’d much rather listen to her than, let’s say, Nia - her voice is kind of annoying.” Despite the fact that Ms. Young could have referenced any one of tens of correspondents, she intentionally chose the only other African-American correspondent to compare to Ms. Phillip - signaling that in her mind, a comparator to Ms. Phillip had to also be African-American in order to qualify as a comparator.

**ANSWER:** Denied.

98. On November 18, 2020, during a conference call between Ms. Watson, Ms. Young, Ms. Meads, and Senior Artists - Jackie Donnelly (NYC), Tiffany Bullock (DC), Sarah Wood (Bleacher Report, NYC), and Ximena Rolfe (LA), Ms. Young brought up that staff would begin hair trainings using mannequin heads, and that everyone needs to get stronger with “ethnic” hair. Ms. Young and Ms. Meads used the term “ethnic” hair repeatedly throughout the call. The correct term is “textured” hair, as any person from any race can have any texture of hair.

**ANSWER:** Defendants admit that during a conference call about mannequin heads the term “ethnic hair” was used. Except as specifically admitted, Defendants deny each and every allegation in Paragraph 98 of the Complaint.

99. Notably, all of the top performers that were brought back to the D.C. bureau were black/African American.

**ANSWER:** Admitted that the top performers in the D.C. bureau hair and makeup department that were brought back were black/African American. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 99 of the Complaint.

100. During Ms. Watson’s tenure as Manager, despite inheriting a staff comprised of only black/African American and Latino members, as of August 2020, Ms. Watson’s team had six black/African American artists, two Caucasian artists, and one Latino artist, making it one most (if not the most) diverse team of any department. She hired fairly and based on experience.



**ANSWER:** Admitted that Ms. Watson’s department was diverse. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 100 of the Complaint.

101. Nevertheless, Ms. Watson, the only black manager, was the only manager questioned about her judgment and decisions. In both New York and Atlanta, all returning staffed artists are Caucasian: Claudia Pedala (NYC); Merrell Daly (NYC); Jackie Donnelly; (NYC); Laura Gattini (NYC) ; Nadia Sobh (ATL); Heather Spann (ATL); and Amanda Alexander (ATL).

**ANSWER:** Admitted that Ms. Watson is the only black manager in the Hair and Makeup Department. Admitted that in both New York and Atlanta that all returning staffed artists were Caucasian. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 101 of the Complaint.

102. On December 1, 2020, Ms. Watson received an email from Roland Tram, advising her that the investigation into her complaints of discrimination and retaliation had been closed, and that the “investigation could not substantiate” her claims of differential treatment based on her race.

**ANSWER:** Admitted that on December 1, 2020, Ms. Watson received an email from Roland Tram and that Paragraph 102 purports to quote to portions of that document. The content of the document speaks for itself. Defendants deny the remaining allegations in Paragraph 102 of the Complaint to the extent they attempt to misstate, mischaracterize, or misquote the language of the document.

103. Ms. Watson is currently still employed, and is on PTO until December 17, 2020, as a result of the work environment.

**ANSWER:** Admitted that Ms. Watson is currently still employed by CNN. Except as specifically admitted, Defendants deny each and every remaining allegation contained in Paragraph 103 of the Complaint.

**COUNT ONE-  
DISCRIMINATION IN THE COURSE OF EMPLOYMENT  
IN VIOLATION OF THE DISTRICT OF COLUMBIA HUMAN RIGHTS ACT  
(Against CNN America Inc.)**

104. The allegations of the foregoing paragraphs are incorporated as if re-alleged herein.

**ANSWER:** In response to Paragraph 104, Defendants incorporate their responses to paragraphs 1-103 and deny the allegations contained in Paragraph 104 of the Complaint.

105. Ms. Watson was an employee of CNN within the meaning of D.C. Code§ 2-1401.02(9).

**ANSWER:** Admitted.

106. CNN is an employer within the meaning of D.C. Code§ 2-1401.02(10).

**ANSWER:** Admitted.

107. CNN through its agents, officers and employees, and in particular, Ms. Young, discriminated against Ms. Watson on account of her race, African-American (black) in the course

of her employment. This discrimination was with respect to the terms, conditions, and privileges of Ms. Watson's employment, in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

108. As set out above in this Complaint, the acts of discrimination included:

- Ms. Young/CNN hiring Ms. Meads at higher salary than Ms. Watson was paid in the same position, despite the fact that Ms. Watson had actual hair & makeup and media experience, and Ms. Meads did not;
- Requiring Ms. Watson to report to work and perform hair and makeup services for Erin Burnett and others - something which was not part of Ms. Watson's job description as Manager, while not requiring Ms. Watson's Caucasian counterpart, Ms. Meads, to do so;
- Requiring Ms. Watson (and no one else within the department) to report to the bureau premises to provide hair and makeup services for Pamela Brown before the bureau officially reopened during the pandemic;
- Ms. Young instructing Ms. Watson to "hire some white girls and change the D.C. culture" which, at the time the comment was made, was comprised of five black artists, and two Latino artists;
- Ms. Young pressuring Ms. Watson to hire a Caucasian freelancer, Michelle Smith, for full time role in Ms. Watson's department;
- Ms. Young pressuring Ms. Watson to promote Michelle Smith to Senior Artist role and, when Tiffany Bullock (black) was promoted instead, suggesting restructuring for job to create a job share arrangement - something which had never been suggested before;
- Ms. Young/CNN increasing Ms. Smith's salary significantly more than other non-white artists despite Ms. Watson's requests to evenly increase all salaries;
- Ms. Young challenging Ms. Watson's choices and management decisions, and when Michelle Smith was not determined to be one of the top three performers to return to work, asking about bringing Ms. Smith back, and inquiring as to how Ms. Smith ranked compared to others (the top performers were black/African American);
- Ms. Young pressuring and intimidating Ms. Watson in to hiring another Caucasian artist, Emily Oldham;

- CNN paying the expenses for Ms. Oldham to visit the Washington, D.C. studio at CNN's expense (in contrast to refusing Ms. Watson's requests for a cost of living increase, moving expenses, or short term living expenses while looking for a place to live, when she was relocating from CNN Atlanta to CNN D.C. for her job);
- Ms. Young commenting that her bi-racial daughter only identifies as black, and stating on several that she had to remind her daughter that "she's white, too;" and
- Ms. Young stating that "black lives matter" is controversial, political opinion and that Ms. Watson's team could not post on social media in support of the #BlackLivesMatter movement, notwithstanding the fact that CNN as a company has sponsored gay rights initiatives in the past.

**ANSWER:** Denied.

109. CNN, through its agents, officers and employees, and in particular, Ms. Young, engaged in the discriminatory conduct set forth above and throughout this Complaint based on Ms. Watson's race, African-American (black), in violation of D.C. Code § 2-1402.11(a)(1).

**ANSWER:** Denied.

110. This discrimination involved and affected the terms, conditions, and privileges of Ms. Watson's employment in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

111. The actions of CNN had the effect and consequence of violating the provisions of the D.C. Human Rights Act, D.C. Code § 2-1401, et seq., in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

112. The discriminatory actions of CNN were intentional, were actuated by malice, spite, and ill-will, were willful and wanton, and evinced a conscious and reckless disregard for the rights of Ms. Watson.

**ANSWER:** Denied.

113. As a direct and proximate result of CNN's conduct, Ms. Watson has suffered, and will in the future suffer, great damage including loss of past and future income, loss of career and business opportunities and advancement, past pecuniary expenses, future pecuniary expenses, great anxiety, headaches, insomnia, weight gain, digestive issues, a loss of confidence, embarrassment, humiliation, inconvenience, a sense of betrayal, isolation and profound injustice, damage to her reputation, mental anguish, stress, pain and suffering.

**ANSWER:** Denied.

114. As a direct and proximate result of CNN's discrimination, Ms. Watson is entitled to recover damages pursuant to D.C. Code § 2-1403.16, as described in D.C. Code §2-1403.13 and the Code of D.C. Municipal Regulations, Title 4, Chapter 2, 4-200 CDCR, et seq.

**ANSWER:** Denied.

115. Due to the character and severity of the actions of CNN, and consistent with its intentional discrimination, Ms. Watson is also entitled to punitive damages.

**ANSWER:** Denied.

**COUNT TWO –  
AIDING AND ABETTING DISCRIMINATION IN THE COURSE OF EMPLOYMENT  
IN VIOLATION OF THE DISTRICT OF COLUMBIA HUMAN RIGHTS ACT**

**(Against Tara Young)**

116. The allegations of the foregoing paragraphs are incorporated as if re-alleged herein.

**ANSWER:** In response to Paragraph 116, Defendants incorporate their responses to paragraphs 1-115 and deny the allegations contained in Paragraph 116 of the Complaint.

117. Through her individual actions, Tara Young, aided and abetted the discrimination against Ms. Watson, as described in more detail in Count I above and throughout this Complaint, in violation of D.C. Code§ 2-1402.11.

**ANSWER:** Denied.

118. Ms. Young aided and abetted the discrimination because of his bias against black employees /employees of color in the workplace.

**ANSWER:** Denied.

119. Acts of discrimination aided and abetted by Ms. Young in supporting condoning and failing to bring an end to acts of discrimination by CNN include those set forth below, and throughout the Complaint, and her condoning the discriminatory behavior and maintaining and ratifying the discriminatory work environment where such behavior was allowed to occur:

- Ms. Young hiring Ms. Meads at higher salary than Ms. Watson was paid in the same position, despite the fact that Ms. Watson had actual hair & makeup and media experience, and Ms. Meads did not;
- Requiring Ms. Watson to report to work and perform hair and makeup services for Erin Burnett and others - something which was not part of Ms. Watson's job description as Manager, while not requiring Ms. Watson's Caucasian counterpart, Ms. Meads, to do so;

- Requiring Ms. Watson (and no one else within the department) to report to the bureau premises to provide hair and makeup services for Pamela Brown before the bureau officially reopened during the pandemic;
- Ms. Young instructing Ms. Watson to “hire some white girls and change the D.C. culture” which, at the time the comment was made, was comprised of five black artists, and two Latino artists;
- Ms. Young pressuring Ms. Watson to hire a Caucasian freelancer, Michelle Smith, for full time role in Ms. Watson's department;
- Ms. Young pressuring Ms. Watson to promote Michelle Smith to Senior Artist role and, when Tiffany Bullock (black) was promoted instead, suggesting restructuring for job to create a job share arrangement - something which had never been suggested before;
- Ms. Young increasing Ms. Smith’s salary significantly more than other non-white artists despite Ms. Watson’s requests to evenly increase all salaries, and then following-up to be certain Ms. Smith’s salary increase was done;
- Ms. Young challenging Ms. Watson’s choices and management decisions, and when Michelle Smith was not determined to be one of the top three performers to return to work, asking about bringing Ms. Smith back, and inquiring as to how Ms. Smith ranked compared to others (the top performers were black/African American);
- Ms. Young pressuring and intimidating Ms. Watson in to hiring another Caucasian artist, Emily Oldham; and
- Ms. Young commenting that her bi-racial daughter only identifies as black, and stating on several that she had to remind her daughter that “she’s white, too.”

**ANSWER:** Denied.

120. The discriminatory conduct of Ms. Young was intentional, and it evinced ill will, recklessness, and willful disregard for the rights of Ms. Watson, as well as wantonness, oppressiveness, maliciousness, and a spirit of mischief.

**ANSWER:** Denied.

121. The discriminatory conduct of Ms. Young had the effect and consequence of violating the provisions of the D.C. Human Rights Act, D.C. Code § 2-1401.1, et seq., in violation of D.C. Code §§ 2-1402.68 and 2-1402.62.

**ANSWER:** Denied.

122. As a direct and proximate result of Ms. Young's conduct, Ms. Watson has suffered, and will in the future suffer, great damage including loss of past and future income, loss of career and business opportunities and advancement, past pecuniary expenses, future pecuniary expenses, great anxiety, headaches, insomnia, weight gain, digestive issues, a loss of confidence, embarrassment, humiliation, inconvenience, a sense of betrayal, isolation and profound injustice, damage to her reputation, mental anguish, stress, pain and suffering.

**ANSWER:** Denied.

123. As a direct and proximate result of the discrimination aided and abetted by Ms. Young, Ms. Watson is entitled to recover damages pursuant to D.C. Code § 2-1403.16, as described in D.C. Code § 2-1403.13 and the Code of the D.C. Municipal Regulations, Title 4, Chapter 2, 4-200 CDCR, et seq.

**ANSWER:** Denied.

124. Because of the character and severity of Ms. Young's conduct as set forth above, Ms. Watson is also entitled to punitive damages.

**ANSWER:** Denied.



**COUNT THREE -  
RETALIATION IN VIOLATION OF THE  
DISTRICT OF COLUMBIA HUMAN RIGHTS ACT  
(Against CNN America Inc.)**

125. The allegations of the foregoing paragraphs are incorporated as if re-alleged herein.

**ANSWER:** In response to Paragraph 125, Defendants incorporate their responses to paragraphs 1-124 and deny the allegations contained in Paragraph 125 of the Complaint.

126. Ms. Watson was an employee of CNN within the meaning of D.C. Code § 2-1401.02(9).

**ANSWER:** Admitted.

127. CNN is an employer within the meaning of D.C. Code § 2-1401.02(10).

**ANSWER:** Admitted.

128. CNN through its agents, officers and employees, and in particular, Ms. Young, retaliated against Ms. Watson on account of her race, African-American (black), and because she complained about the discrimination to which she was subjected, and insisted that CNN properly investigate and address the discrimination. This retaliation was with respect to the terms, conditions, and privileges of Ms. Watson's employment in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

129. As set out above in this Complaint, the acts of retaliation included:

- After Ms. Watson determined not to return Ms. Williams (Caucasian) to the studio, based on the attributes and measurable criteria established for making the decisions, Ms. Watson's decisions were questioned and complained about by Caucasian, on-air talent personalities;
- Brianna Keilar (Caucasian), who was aware that Ms. Williams was not one of the artists returning to the studio called Ms. Watson and requested to have Ms. Williams for her hair and makeup anyway, stating it was a "matter of comfort;"
- Ms. Keilar stating that she would continue to do her own hair and makeup if Ms. Williams was not brought back, instead of allowing one of the three top performing artists (all black/African American) to do her hair and makeup;
- CNN allowing and condoning others (Brianna Keilar, Pamela Brown, Shawn Giangeruso, Amy Entelis - all Caucasian) to question and overturn management decisions made by Ms. Watson, while not treating Ms. Meads (Ms. Watson's Caucasian counterpart) in the same manner;
- Overturning Ms. Watson's decision not to return Ms. Williams to work, and informing Ms. Watson that Ms. Williams would be returning anyway, and that Ms. Watson needed to train her as soon as possible;
- Allowing Ms. Keilar to circumvent Ms. Watson and request her appointments through Ms. Williams, despite Ms. Watson's complaints to Ms. Young and Mr. Bartnick that this was a further act of retaliation, and was a blatant attempt to prevent her from successfully doing her job;
- Excluding Ms. Watson from a town hall meeting, despite her entire department receiving notification; and
- Declaring Ms. Watson ineligible for the severance packages other employees were receiving;
- Mr. Crum telling Ms. Watson not to complaint to anyone at CNN (aside from him) because if she did, she would "fuck up" her chances of receiving a separation package.

**ANSWER:** Denied.

130. CNN, through its agents, officers and employees, and in particular, Ms. Young, engaged in the retaliatory conduct set forth above and throughout this Complaint based on Ms. Watson's race, African-American (black), and because she complained about the discriminatory

treatment she was being subjected to, and insisted that CNN take action, in violation of D.C. Code § 2-1402.1 l(a)(l).

**ANSWER:** Denied.

131. This retaliation involved and affected the terms, conditions, and privileges of Ms. Watson's employment, in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

132. The actions of CNN had the effect and consequence of violating the provisions of the D.C. Human Rights Act, D.C. Code § 2-1401, et seq., in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

133. The retaliatory actions of CNN were intentional, were actuated by malice, spite, and ill-will, were willful and wanton, and evinced a conscious and reckless disregard for the rights of Ms. Watson.

**ANSWER:** Denied.

134. As a direct and proximate result of CNN's conduct, Ms. Watson has suffered, and will in the future suffer, great damage including loss of past and future income, loss of career and business opportunities and advancement, past pecuniary expenses, future pecuniary expenses, great anxiety, headaches, insomnia, weight gain, digestive issues, a loss of confidence, embarrassment, humiliation, inconvenience, a sense of betrayal, isolation and profound injustice, damage to her reputation, mental anguish, stress, pain and suffering.

**ANSWER:** Denied.

135. As a direct and proximate result of CNN's retaliation, Ms. Watson is entitled to recover damages pursuant to D.C. Code § 2-1403.16, as described in D.C. Code §2-1403.13 and the Code of DC. Municipal Regulations, Title 4, Chapter 2, 4-200 CDCR, et seq.

**ANSWER:** Denied.

136. Due to the character and severity of the actions of CNN, and consistent with its intentional retaliation, Ms. Watson is also entitled to punitive damages.

**ANSWER:** Denied.

**COUNT FOUR-  
AIDING AND ABETTING RETALIATION IN VIOLATION  
OF THE DISTRICT OF COLUMBIA HUMAN RIGHTS ACT  
(Against Tara Young)**

137. The allegations of the foregoing paragraphs are incorporated as if re-alleged herein.

**ANSWER:** In response to Paragraph 137, Defendants incorporate their responses to paragraphs 1-136 and deny the allegations contained in Paragraph 137 of the Complaint.

138. Through her individual actions, Tara Young, aided and abetted the retaliation against Ms. Watson, as described in more detail in Count III above and throughout this Complaint, in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

139. Ms. Young aided and abetted the discrimination because of her bias against black employees/employees of color in the workplace and because Ms. Watson complained about,

opposed and resisted Ms. Young's discriminatory conduct towards herself and others, and because Ms. Watson refused to acquiesce to Ms. Young's pressure and demands to retain, hire and/or promote individuals who were not the most qualified for the positions in question.

**ANSWER:** Denied.

140. Acts of retaliation aided and abetted by Ms. Young included:

- Overturning Ms. Watson's decision not to return Ms. Williams to work, and informing Ms. Watson that Ms. Williams would be returning anyway, and that Ms. Watson needed to train her as soon as possible;
- Allowing Ms. Keilar to circumvent Ms. Watson and request her appointments through Ms. Williams, despite Ms. Watson's complaints to Ms. Young that this was a further act of retaliation, and was a blatant attempt to prevent her from successfully doing her job, and Ms. Young refusing to advocate for Ms. Watson on this issue despite Ms. Watson's request that she do so;
- Refusing to acknowledge or address the seriousness of Ms. Watson's complaints of discrimination, hostile work environment, and retaliation, by making jokes (with Ms. Meads) about Ms. Watson's request for a severance package, based on the fact that the work environment had become intolerable and because she was being prevented from successfully performing her job.

**ANSWER:** Denied.

141. Ms. Young engaged in the retaliatory conduct set forth above and throughout this Complaint based on Ms. Watson's race, African-American (black), and because she complained about the discriminatory treatment she was being subjected to, and because she specifically complained about, opposed and resisted Ms. Young's discriminatory treatment of herself and others, in violation of D.C. Code § 2-1402.1 l(a)(l).

**ANSWER:** Denied.

142. This retaliation involved and affected the terms, conditions, and privileges of Ms. Watson's employment, in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

143. Ms. Young's actions had the effect and consequence of violating the provisions of the D.C. Human Rights Act, D.C. Code § 2-1401, et seq., in violation of D.C. Code § 2-1402.11.

**ANSWER:** Denied.

144. Ms. Young's retaliatory actions were intentional, were actuated by malice, spite, and ill-will, were willful and wanton, and evinced a conscious and reckless disregard for the rights of Ms. Watson.

**ANSWER:** Denied.

145. As a direct and proximate result of Ms. Young's conduct, Ms. Watson has suffered, and will in the future suffer, great damage including loss of past and future income, loss of career and business opportunities and advancement, past pecuniary expenses, future pecuniary expenses, great anxiety, headaches, insomnia, weight gain, digestive issues, a loss of confidence, embarrassment, humiliation, inconvenience, a sense of betrayal, isolation and profound injustice, damage to her reputation, mental anguish, stress, pain and suffering.

**ANSWER:** Denied.

146. As a direct and proximate result of Ms. Young's retaliation , Ms. Watson is entitled to recover damages pursuant to D.C. Code § 2-1403.16, as described in D.C. Code § 2- 1403.13 and the Code of D.C. Municipal Regulations, Title 4, Chapter 2, 4-200 CDCR, et seq.

**ANSWER:** Denied.

147. Due to the character and severity of Ms. Young's actions , and consistent with his intentional retaliation , Ms. Watson is also entitled to punitive damages.

**ANSWER:** Denied.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff LATOYA D. WATSON, by counsel, jointly and severally, requests that this Court enter judgment in her favor, and against the Defendants, CNN AMERICA INC. and TARA YOUNG, jointly and severally, on the above counts as applicable to each, and further:

(a) Award Ms. Watson compensatory damages on each of the above-stated Counts; and in addition

(b) Award Ms. Watson punitive and exemplary damages on each of the above-stated Counts; and in addition

(c) Award injunctive relief consisting of an order prohibiting Defendant CNN America Inc. from engaging in further employment practices that create or tolerate a hostile, discriminatory or retaliatory work environment based on race; and in addition

(d) Declare that the Defendants have violated the District of Columbia Human Rights Act; and in addition

(e) Enjoin the Defendants from further violations of the District of Columbia Human Rights Act; and in addition,

(f) Award Ms. Watson reasonable attorneys' fees and the costs of this action, including expert witness fees; and in addition

(g) Award Ms. Watson such other and further relief as may be appropriate under the circumstances.

**ANSWER:** Defendants deny that Plaintiff is entitled to the relief sought in the section entitled "Prayer for Relief" and further deny that Plaintiff is entitled to any relief whatsoever.

**JURY DEMAND**

**PLAINTIFF LATOYA D. WATSON DEMANDS A TRIAL BY JURY.**

**ANSWER:** Admitted that Plaintiff demands a trial by jury.

**FURTHER DENIALS AND DEFENSES**

Defendants further respond to Plaintiff's Complaint by stating that any allegation not specifically admitted herein is denied and, without assuming any burden of proof that would otherwise rest with Plaintiff, Defendants state the following further defenses:

**FIRST DEFENSE**

The Court lacks jurisdiction over the subject matter of the Complaint to the extent that Plaintiff has failed to satisfy each and every procedural and/or administrative prerequisite of her claims.

**SECOND DEFENSE**

Plaintiff fails to state a claim for which relief can be granted.

**THIRD DEFENSE**

Plaintiff's claims are time-barred in whole or in part by applicable statutes of limitations.

**FOURTH DEFENSE**



Plaintiff's claims are barred by the doctrines of waiver, estoppel, laches, and/or unclean hands.

#### **FIFTH DEFENSE**

To the extent Plaintiff's claims are based on or arise out of events alleged to have occurred outside the statutory time period for filing a charge of discrimination with the Equal Employment Opportunity Commission, they are barred as untimely.

#### **SIXTH DEFENSE**

Plaintiff's claims are barred to the extent such claims differ from or exceed the scope of any timely filed charge of discrimination.

#### **SEVENTH DEFENSE**

Any award of compensatory or punitive damages claimed herein is subject to the statutory caps applicable to such claims.

#### **EIGHTH DEFENSE**

All actions of Defendants in this matter were taken in good faith and for legitimate, non-discriminatory and non-retaliatory reasons.

#### **NINTH DEFENSE**

If any improper, illegal, or discriminatory acts were taken by any person against Plaintiff, it was outside the course and scope of that employee's employment, contrary to Defendants' policies, and was not ratified, confirmed, or approved by Defendants. Thus, any such actions cannot be attributed or imputed to Defendants.

#### **TENTH DEFENSE**

Although Defendants deny that they discriminated or retaliated against Plaintiff in any way, to the extent that it is determined that an impermissible motive may have been a factor in any

decision regarding Plaintiff, which is denied, the same decision would have been reached based upon legitimate, non-discriminatory, and non-retaliatory business reasons.

**ELEVENTH DEFENSE**

Plaintiff did not suffer any adverse employment actions.

**TWELFTH DEFENSE**

There can be no inference of discrimination where Plaintiff was hired and promoted multiple times by Defendant Young.

**THIRTEENTH DEFENSE**

Defendant Young did not engage in any discriminatory or retaliatory conduct.

**FOURTEENTH DEFENSE**

Defendant Young did not aid, abet, invite, compel, or coerce, or attempt to aid, abet, invite, compel, or coerce any discriminatory or retaliatory conduct.

**FIFTEENTH DEFENSE**

Defendant Young did not know, nor should she have known, about any alleged discriminatory or retaliatory conduct.

**SIXTEENTH DEFENSE**

Defendants did not intentionally, deliberately, or knowingly engage in any conduct in violation of any federal or local statute, nor did Defendants exhibit reckless disregard for the requirements of any law or act with malice toward Plaintiff.

**SEVENTEENTH DEFENSE**

Defendants are not liable for punitive damages because neither Defendants nor any of their employees committed any act with actual malice, evil motive, or reckless indifference to Plaintiff's

rights as protected by federal or local law, or approved, authorized or ratified such, or had actual knowledge of any such acts.

**EIGHTEENTH DEFENSE**

Defendants acted in good faith and had reasonable grounds for believing that their conduct and actions were lawful and in compliance with federal and local law.

**NINETEENTH DEFENSE**

Defendants deny that they violated any federal or local laws or damaged Plaintiff and denies that Plaintiff is entitled to any damages in this case. Nonetheless, to the extent Plaintiff may be entitled to damages, those damages must be reduced because of her failure to mitigate some or all of her damages.

**TWENTIETH DEFENSE**

Plaintiff's damages may be barred, in whole or in part, by the doctrine of after-acquired evidence.

WHEREFORE, having answered Plaintiff's Complaint, Defendants respectfully request that the Court enter judgment in favor of Defendants, dismiss all claims against Defendants with prejudice, award Defendants their costs and reasonable attorneys' fees, and allow Defendants such other and further relief as the Court may deem just and proper.

Dated: August 31, 2021

Respectfully submitted,

/s/ Denise E. Giraudo

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2021 I caused a true and correct copy of the foregoing ANSWER TO COMPLAINT to be served via first-class mail, postage prepaid on the following:

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