

Rights on all charges on January 30 2015. (Ex. 1, 2, 3, 4) Plaintiff filed Complaint on April 30 2015 within 90 days of receipt of Notice of Suit Rights.

11. On May 5 2014, Robert submitted letter to the City of South Bend Board of Public Safety (BOPS), COSB Human Resources Department and the office of the Mayor alleging employment discrimination based on race and unfair treatment against black COSB police officers, perpetrated by Chief Teachman. The letter requested that an immediate investigation.

12. Robert received no response from the parties to whom the letter directed.

13. On May 21 2014, Robert submitted a similar letter to the same entities requesting an investigation.

14. On June 6 2014, Robert and several other COSB black police officers presented a formal complaint of misconduct against Chief Teachman and Mayor Buttigieg to the Citizens of South Bend and the COSB City Council members during a formal city council meeting.

15. On June 10 2014, Robert and other COSB black police officers presented four (4) separate complaints to Mayor Buttigieg, Cadotte, and the COSB City Council members. The complaints requested an investigation by the Legal Department, or an outside agency into the allegations of racial discrimination by Buttigieg and Teachman. The letter also requested that Teachman be placed on administrative leave until the investigation completed.

16. Robert and the other black police officers did not receive a response to the June 10 2014 complaints.