

AFFIDAVIT OF JO FREDERIKSEN

STATE OF TEXAS

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COUNTY OF HARRIS

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On this day, Jo R. Frederiksen, appeared before me, the undersigned notary public and after I administered an oath to her, upon her oath, she said:

“My name is Jo R. Frederiksen. I am over the age of 18 and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

I was hired by Halliburton/KBR and worked on the LOGCAP III (Logistics Civil Augmentation Program) project in Iraq from July 2003 to November 2007. I have never seen a more atrocious hostile working environment, and especially oppressive to women. I have reported and I have witnessed co-workers report sexual discrimination and harassment, retaliation, coercion and intimidation, and dangerous working conditions to Dispute Resolution Program (“DRP”), specifically through Gabe Andino, while he was manager over all Regional Project Managers, HR and/or Project Managers of the D&F Sites. These reports were not handled as promised under the DRP policies and procedures as presented to employees when hired. While employed by Halliburton/KBR, I witnessed and was exposed to an extreme sexually hostile environment and criminal acts that went without proper internal discipline or criminal prosecution encouraging a lawless work and living environment for KBR/Halliburton employees. Below is an example of only a select few of my experiences in the four years that I was in Iraq.

I arrived on BIAP (Baghdad International Airport) on September 7, 2003 via convoy at approximately 1330 hrs. I met several people at the site that day. The following morning I met with Johnny Kelly and he stated that he couldn’t believe how men reacted to me. He told me that someone had asked him the day before whether I preferred black men or white men.

On or about September 10, 2003, James Seaton, the QA/QC (Quality Assurance\Quality Control) manager asked me if I could take him and another person to Camp Victory. I requested that he drive since I was not familiar with the area. While James Seaton and I were alone in the vehicle, he reached over and clasped my hand and I attempted to disengage my hand. He asked me if it bothered me because it didn’t bother him. I told him that I was not interested in a romantic relationship and I assumed that this type of behavior would not occur again.

Days later, James Seaton and I were alone together while he was sitting at his desk talking. He was facing me with his legs apart and his hands resting on his inner thighs and groin area as he adjusted himself, similar to baseball players. Over the next several weeks, his behavior escalated to the point that he would curl his tongue and wiggle it in a disgusting manner while fondling and stroking his groin area when we were alone in the office area. He would also blow kisses at me, sometimes in the presence of others. I soon learned that several of the men that resided on the sixth floor of Hotel California, including Steve Young, the Operations Coordinator, referred to



James Seaton as "the pervert."

There were no locks on the doors to quarters and no way to secure our belongings or ourselves. There have been other instances wherein fellow employees have attempted to sexually intimidate me and/or cause me to feel very uncomfortable and fear for my safety. I reported these incidents verbally to management and told them of my fear. Nothing was ever done to provide a safer environment for me or other women. In fact, I was told by one manager "honey, you should just go on home" and was told by another, Daryl Johnson, to "play the game." This evidently meant that I should just accept all the wrongdoing, including sexual advances and intimidation by the male employees, as acceptable behavior.

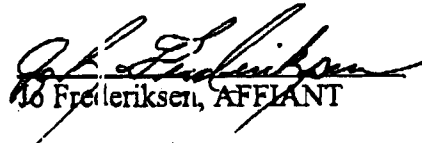
Employees were told to call the Ethics Hotline or the "800" number to file complaints of various improper behavior. Bruce Chirinko, Project Manager, stated that the "800" number essentially meant nothing and he was going to do things his way. Scott Moun, Area Manager and later became the D&F Sites Project Manager, threatened numerous employees that if they called the "800" number they would be terminated and shipped back to the United States.

On one evening, Bruce Chirinko discussed his plans for leaving on R&R with a group of people, including military personnel. He mentioned he was missing a family event that was taking place and laughed when he told everyone that he was going to have to explain to his nephew why going to Thailand was more fun than attending a family function. I felt uncomfortable and was both repulsed and embarrassed that a PM would discuss hiring a prostitute in front of me and the customer. In July of 2007 one of my subordinates came to me and told me about a conversation he had with Bruce. The employee mentioned that he and his wife were having some relationship problems and that when he mentioned this to Bruce he told him that he should go to his favorite place in Thailand and that the last time he (Bruce) was there he lined up 40 shots of alcohol and ended up upstairs with three women. As a result, I filed complaints against Bruce. In retaliation, I believe that Bruce started an improper investigation into my work and made false allegations against me as a result of my being vocal about his sexual discrimination and harassment which caused a sexually hostile environment.

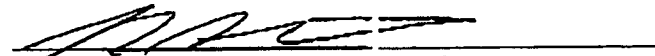
Management has threatened to fire me for reporting or telling my subordinates how to report inhuman and abusive behavior by management, including such acts as, transferring people to very dangerous jobs or locations in retaliation for reporting management's failure to maintain proper food rations which caused people to rummage through garbage cans for food. As recent as September 2007, I submitted a lengthy fact statement to Halliburton/KBR that highlighted some of the failures of the DRP and reporting of improper conduct to Halliburton/KBR management.

After four (4) years, I lost faith in the DRP and availability of corrective actions for improper and criminal conduct among employees. No one could get help with these issues and we did not know what to do, where to turn or any other means to get help especially being located overseas."

Further affiant sayeth not


J. Frederiksen, AFFIANT

sworn to and subscribed before me on the 10th day of JANUARY, 2008.


notary public in and for the state of texas
(seal)

