

April 11, 2017

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Re: Request for Investigation into Sexual Harassment and Retaliation at Fox News

Dear Mr. Powell and Ms. Yearwood-Drury:

I am a civil rights attorney admitted to practice in California and New York. I have represented and conferred with a number of women alleging sexual harassment and retaliation at Fox News, owned by parent company 21st Century Fox. Under the unusual facts presented below, I respectfully request that the State Division of Human Rights (“SDHR”), upon its own motion, open an investigation.

I. INTRODUCTION

New York has the proud distinction of being the first state to enact a Human Rights Law, affording every citizen “an equal opportunity to enjoy a full and productive life.”¹ This law prohibits discrimination in employment, housing, and education, as well as discrimination based

¹ New York Executive Law §290

on gender, age, race, sex, sexual orientation, marital status, disability, and other specified classes. Sexual harassment is a form of discrimination and every employee in the State of New York is entitled to a working environment free from improper words and conduct. Retaliation against an employee who has complained of sexual harassment is unlawful. The SDHR has the power “upon its own motion” “to initiate investigations” into discrimination or harassment.² We ask that it do so now given the deeply disturbing publicly known facts about Fox News.

Fox News is a television cable network and New York City employer of hundreds of workers. Over the last thirteen years, dozens of women have reported egregious sexual harassment and retaliation at Fox News, with new claims constantly coming to light. As is outlined below, the company frequently pays women to remain silent and leave the company while the perpetrators and enablers keep their jobs. Others are scared into silence by the company’s well documented intimidation tactics, including using its giant media platform to smear their reputations. **Nearly all of the victims were not only driven out of Fox News, but the television industry entirely.**

Since many of the victims live under strict confidentiality agreements, they cannot bring their claims to the SDHR. Others, like our client Dr. Wendy Walsh, have claims that are likely time barred, and so would be rejected by the SDHR. (Dr. Walsh is happy to cooperate.)

Fox News cannot be allowed to so openly and blatantly violate New York law. This wrong cries out for a remedy. We therefore respectfully request that the SDHR initiate, upon its own motion, a prompt, thorough investigation into Fox News. Subpoena the confidentiality agreements. Interview witnesses. Make findings. Require compliance. Show this company that it is not above the law.

² NY Human Rights Law Section 295(6)(b).

II. BACKGROUND: DOZENS OF WOMEN ARE SEXUALLY HARASSED AND RETALIATED AGAINST AT FOX NEWS, YEAR AFTER YEAR

The following information is alleged upon information and belief based upon witness statements, court documents, and reports from multiple reputable media sites. Fox News and the individuals accused of wrongdoing deny the claims.

A. FOX NEWS' WORKPLACE IS A CESSPOOL OF SEXUAL HARASSMENT, INTIMIDATION AND RETALIATION

1. For twenty years, Fox News was run by a predator, Roger Ailes

Roger Ailes, arguably the most powerful man in American media during his 1996-2016 run as CEO of Fox News, was also the most predatory. During his twenty years there, Mr. Ailes' treatment of female employees created a hostile environment of rampant sexual harassment, sexual assault, overt misogyny, and retaliation. Mr. Ailes propositioned dozens of female employees to have sex with him, promising that doing so would further their careers and that denying him would be ruinous.³ In at least one case, Mr. Ailes threatened an employee into having sex with him, making a video of the event and then blackmailing her into years of sexual relations with the threat that otherwise he would release the video.⁴ Mr. Ailes normalized the practice of senior male executives and anchors preying on subordinate female employees.

Fox News over-sexualized and policed the appearance of on-air female "talent" (those who appear on camera). Mr. Ailes insisted on hiring only female talent who were sexually appealing to him, requiring them to "do the twirl" before him so he could examine their figures, front and back, and strictly enforced the dress code of brightly colored, short, tight dresses and

³ http://www.huffingtonpost.com/entry/roger-ailes-accusers-list_us_57a9fa19e4b06e52746db865

⁴ *Id.*

high heels for them.⁵ Mr. Ailes created the “leg cam” to linger on “upskirt” shots of female talent’s legs and mandated against females wearing boots on-air.⁶ Women were rarely allowed to have short hair. This mandatory hypersexualization of female journalists, lawyers and experts (but not their male counterparts) continues to date.

To maintain this hostile and sexist work environment, Mr. Ailes hired consultants, political operatives, and private detectives to carry out his well-known vendettas of retribution against his enemies and accusers. From his “Black Room”⁷ on the fourteenth floor of Fox News, Mr. Ailes operated his authoritarian Mafia-like workplace riddled with corruption and surveillance, smear campaigns and hush money. Fox News’ PR machine swiftly and publicly smeared women who opposed him.

2. Fox News Hired Roger Ailes Despite Knowing

His History of Abusive, Intimidating Behavior

Mr. Ailes was driven out of his previous position as President of cable network CNBC (1993-96) for engaging in bullying behavior. A report prepared by NBC’s attorneys noted Mr. Ailes’ “history of abusive, offensive, and intimidating statements/threats and personal attacks.”⁸

Shortly after Mr. Ailes’ termination from CNBC, Mr. Murdoch created Fox News and appointed Mr. Ailes as CEO of the new conservative network. Given Mr. Ailes’ history, Fox News and its predecessor, successor, parent and affiliated entities (collectively, “Fox News”) knew or should have known that Mr. Ailes regularly and openly flouted federal, state and local

⁵ http://www.huffingtonpost.com/entry/roger-ailes-accusers-list_us_57a9fa19e4b06e52746db865

⁶ <http://www.npr.org/2016/07/06/484987329/gretchen-carlson-sues-fox-news-roger-ailes-for-sexual-harassment>

⁷ <http://nymag.com/daily/intelligencer/2016/08/ailes-used-fox-budget-to-finance-campaigns-against-enemies.html>

⁸ <http://nymag.com/daily/intelligencer/2016/09/how-fox-news-women-took-down-roger-ailes.html>

civil rights laws. At a minimum, Fox News should have closely monitored Mr. Ailes and the workplace he created, advised employees of their rights, and provided appropriate avenues for redress of complaints. Instead, senior executives failed to investigate reports of sexual misconduct, and protected the powerful men who perpetrated it.

3. Fox News Executives Create a Hostile Work Environment, Sexually

Harass and Retaliate Against a Long List of Female Employees

Mr. Ailes' outrageous behavior not only continued, but worsened over the course of twenty years at the helm of Fox News. Recent reports reveal that Mr. Ailes sexually harassed more than two dozen women at Fox News.⁹ The actual number is likely far higher.

Journalist Rudi Bakhtiar claims she was sexually harassed in 2006, not only by Mr. Ailes, but also by a former Fox News Washington Bureau chief, who requested to “see the inside of her hotel room” before making her a full-time correspondent. When she declined his request for sex, she was promptly removed from the prestigious Washington bureau. Ms. Bakhtiar also claims that Mr. Ailes asked her to stand so he could see her legs and insisted that she wear miniskirts rather than pants to work.

In February of 2007, Ms. Bakhtiar contacted a Fox News executive and informed him of Mr. Wilson's request for sex and her subsequent reassignment. The executive touted Fox News' purported zero-tolerance policy for sexual harassment and promised her a thorough investigation. However, instead of investigating her claims, a Fox News attorney badgered Ms. Bakhtiar. By March of 2007, Ms. Bakhtiar was assigned frivolous stories and tabloid assignments,

⁹ *Id.*

diminishing her career at Fox News. Ms. Bakhtiar states Fox News management's attitude about sexual harassment is, "it's only a problem if you complain about it."¹⁰

Soon after she reported the sexual harassment, Ms. Bakhtiar was terminated. Fox News paid out the remainder of her three-year contract, plus her legal fees. In exchange, she was required to sign a confidentiality agreement to prevent other women from knowing her story.

Ms. Bakhtiar is no longer working in television, her chosen profession.

This quickly became a pattern and practice.

Fox News anchor Laurie Dhue claims that Mr. Ailes sexually harassed her around 2006 and that when she complained, she was terminated. Her broadcast journalism career suffered significantly thereafter.

Perhaps the most disturbing story is that of Fox News' former Director of Booking, Laurie Luhn, who says that Mr. Ailes sexually abused her for more than twenty years.¹¹ She reports that Fox News executives and attorneys knew about the abuse and covered it up. She recalls the harassment as "psychological torture" that ruined her life. Ms. Luhn said she could not escape Mr. Ailes' grip because he threatened to publicly release a sex tape he made of her if she denied him sex.¹²

Ms. Luhn also claims that Mr. Ailes told her to "find [him] whores," referring to female employees to hire at Fox News.¹³ Ultimately, the stress of working at Fox News under these appalling conditions resulted in her suffering a mental breakdown while en route to Mexico.

Although a psychiatrist recommended Ms. Luhn return home, a Fox News executive arranged

¹⁰ <https://www.nytimes.com/2016/07/24/business/at-fox-news-kisses-innuendo-propositions-and-fears-of-reprisal.html>

¹¹ <http://nymag.com/daily/intelligencer/2016/07/fmr-fox-booker-harassed-by-ailes-for-20-years.html>

¹² *Id.*

¹³ *Id.*

for Ms. Luhn to remain at a hotel for several days in Houston, thereby preventing her from speaking to friends and family. Fox News then flew her to New York, where Mr. Ailes kept Ms. Luhn to monitor her, and even required approval of all her outgoing emails.

In late 2010 or early 2011, Ms. Luhn wrote a letter to Fox News in house counsel to report that Mr. Ailes sexually harassed her for twenty years. The attorney did not acknowledge receipt of the letter.

In 2011, Mr. Ailes ordered a Fox News attorney to work out a settlement agreement with Ms. Luhn. Ms. Luhn signed a \$3.15 million severance agreement. In exchange, Fox required a strict confidentiality clause to prevent other women from knowing her story. After journalists discovered and reported on her story, she was publicly branded a “whore.”¹⁴

Ms. Luhn is no longer working at Fox News, and she is no longer working in television, her chosen profession.

Fox News host Gretchen Carlson claims that for a decade (2006-16), Mr. Ailes made sexually inappropriate comments about her legs and told her to wear tighter fitting clothes at work.¹⁵ In response to Ms. Carlson’s complaints of cohost Steve Doocy’s on-air condescension, Mr. Ailes called Ms. Carlson a “man hater” and told her she “needed to get along with the boys.”¹⁶ After she complained, Ms. Carlson’s role was diminished, and she was moved to a lower rated time slot.

¹⁴ <http://www.nydailynews.com/news/national/stasi-roger-ailes-whore-not-innocent-article-1.2732431>

¹⁵ <https://www.nytimes.com/2016/09/07/business/media/fox-news-roger-ailes-gretchen-carlson-sexual-harassment-lawsuit-settlement.html>

¹⁶ <https://www.nytimes.com/2016/07/07/business/media/gretchen-carlson-fox-news-roger-ailes-sexual-harassment-lawsuit.html>

Ms. Carlson subsequently recorded conversations in Mr. Ailes' office, in which he said, "I think you and I should have had a sexual relationship a long time ago, and then you'd be good and better," in addition to other predatory remarks.¹⁷

In May of 2016, Ms. Carlson filed a sexual harassment and retaliation lawsuit against Mr. Ailes. The Fox News PR machine immediately went into attack mode against Ms. Carlson. Senior executives reportedly encouraged well-known Fox News personalities to publicly discredit her. Television host and Senior Vice President of Fox Business, Neil Cavuto, penned a lengthy essay in support of Mr. Ailes, calling the allegations sick and nonsensical. On air hosts Geraldo Rivera and Greta Van Susteren also attacked Ms. Carlson. After journalists unearthed dozens of women who claimed Roger Ailes had sexually harassed them as well, and after being publicly disgraced, Fox News paid Ms. Carlson \$20 million in severance, but required her to sign a confidentiality agreement.

Ms. Carlson is no longer working in television, her chosen profession.

Fox News host Andrea Tantaros stated that she and her agent complained multiple times to a Fox News executive and attorney that Mr. Ailes sexually harassed her.¹⁸ Ms. Tantaros says that they never investigated her claims, but rather sidelined her and ultimately took her off the air. Mr. Shine reportedly told her that "Roger [Ailes] is a very powerful man" and that she "should not fight this."¹⁹ Ms. Tantaros describes Fox News as a "sex-fueled, Playboy-Mansion-like cult."²⁰

¹⁷ *Id.*

¹⁸ <http://www.thedailybeast.com/articles/2016/08/23/andrea-tantaros-sues-fox-news-ensnares-bill-o-reilly-scott-brown-and-dean-cain.html>

¹⁹ *Id.*

²⁰ *Id.*

Ms. Tantaros also complained of sexual harassment by Fox News anchor Bill O'Reilly, claiming that he asked her to come stay with him on Long Island, where it would be "very private" and told her that he could see her "as a wild girl" with a "wild side."²¹ After Ms. Tantaros complained to a Fox News attorney, she was no longer invited to appear on Mr. O'Reilly's highly rated prime time show.

After filing a sexual harassment and retaliation lawsuit, Ms. Tantaros no longer appears on the network, her career stalled. She has not been seen working elsewhere in the television industry.

Fox News anchor Megyn Kelly states that Mr. Ailes made unwanted sexual advances towards her about ten years ago, and that Mr. Ailes promised to advance her career in exchange for sexual favors. She claims he grabbed her and tried to kiss her. When she shoved him away, he asked her "When is your contract up?" before trying to kiss her again.²²

Ms. Kelly did not complain about these incidents due to fear of retaliation. Only *after* Mr. Ailes was terminated for multiple acts of sexual harassment, did she publicly speak in November of 2016 about her experience of sexual harassment. Despite Mr. Ailes' departure, Ms. Kelly experienced retaliation by the Fox PR machine for speaking out. She was called "selfish" and subject to unwarranted attacks on her character and integrity. She says Fox News was "set up to isolate and silence" sexual harassment victims.²³

4. Six Women Accuse Bill O'Reilly of Sexual Harassment and Improper Conduct

After Roger Ailes, Bill O'Reilly appears to be the most prolific predator at Fox News, preying on women workers, threatening and inflicting career damage on those who do not

²¹ *Id.*

²² <http://www.businessinsider.com/megyn-kelly-harassment-allegations-roger-ailes-kiss-2016-11>

²³ Kelly, Megyn. (2016) *Settle for More*. New York, NY: HarperCollins

comply with his sexual demands. The primetime host of Fox News' #1 show, Mr. O'Reilly is well known for his hot temper and vindictiveness over minor workplace inconveniences.²⁴ In 2002, Mr. O'Reilly stormed into the newsroom and screamed at a young producer, Rachel Bernstein. Ms. Bernstein left the network bound by a confidentiality agreement. **She does not appear to have worked in television since.**

Enabled by an employer that kept him on and apparently failed to punish him, Mr. O'Reilly's behavior escalated.

Andrea Mackris filed a lawsuit against Mr. O'Reilly in 2004, in which she detailed his multiple telephone calls to her while he masturbated to orgasm, his frequent explicit talk of his sexual fantasies, and his many efforts to have sex with her, all while she was a producer on his show. She reportedly had several audio recordings. To intimidate her, before Ms. Mackris filed suit, Fox News and Mr. O'Reilly surprised her with a pre-emptive suit of their own, asserting she was seeking to extort \$60 million in return for not going public with "scandalous and scurrilous" claims about him.²⁵ A public relations firm was hired to smear Ms. Mackris. A private investigator, Bo Dietl was retained to dig up information consistent with O'Reilly's claims that Ms. Mackris was promiscuous, deeply in debt and trying to take advantage of him. (Mr. Dietl is so shady he's called for the public assassination of someone he disagrees with.²⁶) The parties reportedly settled for \$9 million, with a strict confidentiality clause. Notwithstanding Mr. O'Reilly's egregious misconduct which would have gotten anyone else at any other company fired, Fox News stood by Mr. O'Reilly, who remains at the network.

²⁴ https://www.youtube.com/watch?v=O_HyZ5aW76c

²⁵ <https://www.nytimes.com/2017/04/01/business/media/bill-oreilly-sexual-harassment-fox-news.html>

²⁶ <https://www.youtube.com/watch?v=qK4T6Odnlco>

Ms. Mackris, however, was driven out of Fox News. She has not worked in the television industry since.

Just this past September, Fox News reached a settlement with Juliet Huddy, a regular on Mr. O'Reilly's show, after he aggressively pursued a sexual relationship with her in 2011 and made calls to her while he was apparently masturbating, just as he was alleged to have done with Andrea Mackris seven years earlier.²⁷ However, before Ms. Huddy reached an agreement with Fox News, Mr. O'Reilly's lawyer sent Ms. Huddy's lawyer a letter threatening to reveal embarrassing personal issues if she continued to pursue a claim against Mr. O'Reilly. The letter also threatened that should Ms. Huddy continue he would pursue legal action "to hold Ms. Huddy, and all who have assisted her, personally liable for any damage suffered by him or his family."²⁸

Ms. Huddy was driven out of Fox News, and out of the entire television industry.

Also in 2016, Mr. O'Reilly privately settled a suit in which Rebecca Gomez Diamond, a former host on the Fox Business network who reportedly recorded lewd conversations with O'Reilly, just as Ms. Mackris had.²⁹ Clearly Mr. O'Reilly had learned nothing from the Mackris lawsuit twelve years earlier, and Fox News had failed to take effective disciplinary action to protect women workers, allowing his egregious behavior to continue unabated.

Ms. Diamond was driven out of Fox News, and of the entire television industry.

Despite a statement that Fox News issued after Ailes' departure stating that "the company [does] not tolerate behavior that disrespects women or contributes to an uncomfortable work

²⁷ https://www.nytimes.com/2017/04/01/business/media/bill-oreilly-sexual-harassment-fox-news.html?_r=0

²⁸ *Id.*

²⁹ *Id.*

environment,”³⁰ it has continued to tolerate it, enable it, pay out claims, silence women, and destroy their careers. Mr. O’Reilly and Fox News have reportedly paid out over \$13 million for his sexual harassment alone. Yet Mr. O’Reilly’s contract was just renewed. Fox News has had the power to prevent the sexual harassment of any new victims by firing Bill O’Reilly. Its choice to keep him, year after year, makes it complicit in his continued, outrageous victimization of women. Apparently, the network thinks multimillion dollar payouts to victims is just a routine cost of doing business, and as long as it can continue to do so, it can continue to flout the laws against workplace misconduct.

I am proud to represent Dr. Wendy Walsh, who alleges that she was denied a promised contributor job at Fox News after she refused to go to Mr. O’Reilly’s hotel room with him in 2013. She is not suing Mr. O’Reilly, nor is she asking for any money. However, Dr. Walsh has recently phoned in a complaint to Fox News’ complaint hotline and is fully cooperating with that investigation.³¹ (The problem is, the investigation is conducted by attorneys for Fox News, who are ethically obligated to represent the company, and have no obligations to Dr. Walsh – an inherent conflict of interest.)

Dr. Walsh is willing to fully cooperate with any investigation by the SDHR or any other agency.

Just last week, Fox News contributor Julie Roginsky filed a sexual harassment lawsuit against Fox News. The suit claims that Fox News, Mr. Ailes and others “unlawfully harassed, discriminated against, and retaliated against Ms. Roginsky and sabotaged her career.”³²

³⁰ <https://www.nytimes.com/2017/04/01/business/media/bill-oreilly-sexual-harassment-fox-news.html>

³¹ <https://www.youtube.com/watch?v=IkIkIFdhu0Q>

³² <https://www.nytimes.com/2017/04/03/business/media/fox-news-roger-ailes-harassment-suit.html>

The suit alleges that Mr. Ailes made unwanted sexual advances on Ms. Roginsky, repeatedly calling her into his office for one-on-one meetings where he required that she “bend down to kiss him hello” while he sat in a low armchair so that he could look down her dress.³³ He also would encouraged her to “engage in sexual relationships with ‘older, married, conservative men.’”³⁴ Ms. Roginsky also alleges that Mr. Ailes would often make sexist comments about other Fox News employees, and that she faced retaliation for refusing Mr. Ailes’s advances and for refusing to disparage Gretchen Carlson, resulting in the denial of a permanent position as a host on the program “The Five.” Ms. Roginsky said that Fox News never investigated her complaints, and that other network executives were aware of her harassment and retaliation claims.

Discrimination at Fox News is not limited to gender. Last month, two African American women, Tabrese Wright and Tichaona Brown, filed a discrimination lawsuit against Fox News, claiming that were subjected to multiple instances of racial harassment in the Fox News payroll department.

Ms. Brown and Ms. Wright allege that the Fox News controller made numerous offensive comments, harassed employees of color, making fun of the Black Lives Matter movement and referring to the payroll department as the “urban” or “Southern” payroll department.³⁵ She also suggested that black men were “women beaters” and that black people wanted to physically harm white people, and asked Ms. Wright if her three children “were fathered by the same man,” and mocked her hair and credit score.³⁶

³³ *Id.*

³⁴ *Id.*

³⁵ <https://www.nytimes.com/2017/03/28/business/media/fox-news-racial-discrimination-lawsuit-slater.html>

³⁶ *Id.*

A third African American employee, Monica Douglas, promptly joined the racial discrimination lawsuit brought by Ms. Wright and Ms. Brown, alleging that she too was subjected to racial slurs and harassment.

For years, plaintiffs claim, the company tolerated Ms. Slater’s behavior of subjecting minority employees to “a racially hostile work environment without fear of punishment or reprisal.”³⁷ The lawsuit names four other black employees who left or were forced out, citing similar accusations of discrimination.

My office is constantly fielding calls from others alleging harassment, discrimination and/or retaliation at Fox News. I believe that these complainants would cooperate with your investigation if they could be promised confidentiality.

B. ONLY AN SDHR INVESTIGATION CAN REMEDY THE CONTINUED ILLEGAL CONDUCT AT FOX NEWS

Last summer, in response to public outcry about its sexual harassment scandal, Fox News announced it was undertaking an “independent investigation.”³⁸ This was false. It did not. Instead, it hired the giant corporate law firm, Paul Weiss, to represent its interests. Any investigation by Paul Weiss was limited to women who complained, and conducted by a law firm ethically obligated to zealously represent the interests *only* of Fox News. Information gathered by Paul Weiss was used against the women, in an attempt to discredit and diminish their claims. And while the Securities and Exchange Commission appears to be investigating the

³⁷ <https://www.usatoday.com/story/money/2017/03/29/2-black-women-sue-fox-news-network-alleged-racial-discrimination/99797718/>

³⁸ <http://money.cnn.com/2016/07/27/media/fox-news-internal-review-paul-weiss/>

company's financial treatment of its many settlement payouts, that has no bearing on its treatment of women in its workplace.³⁹

While it is more common for the SDHR to investigate complaints brought to it by complainants, SDHR's authority to file a complaint on its own motion is authorized by statute⁴⁰ and has previously been upheld by statute and case law. As the Appellate Division, Fourth Department said in *State Div. of Human Rights v. Kilian Mfg. Corp.*, 42A.D.2d 391 (1973):

We recognize that in many cases before the division there have been individual complainants, or complaints from the Attorney General or the Commissioner of Labor. A fair reading of the quoted statutory language "to make, sign and file complaints" compels the conclusion, however, that **the division has authority to act upon its own motion regardless of the existence of any individual complainant or complaint.** Indeed, the Legislature intended to provide the division with sufficient authority to implement its long-range goals without requiring it to rely on individual complainants, recognizing that the power of affirmative action in the area of human rights is a proper government function.

This finding was reaffirmed in *Town of Oyster v. Kirkland*, 978 N.E.2d 1237 (N.Y 2012) (SDHR may bring action on its own volition).

³⁹ <https://www.nytimes.com/2017/02/15/business/media/fox-news-sexual-harassment-payments.html>

⁴⁰ NY Human Rights Law Section 295(6)(b).

CONCLUSION

The purpose of the New York Human Rights law is set forth in the law itself:

The legislature hereby finds and declares that the state has the responsibility to act to assure that every individual within this state is afforded an equal opportunity to enjoy a full and productive life and that the failure to provide such equal opportunity, whether because of discrimination, prejudice, intolerance . . . not only threatens the rights and proper privileges of its inhabitants but menaces the institutions and foundation of a free democratic state and threatens the peace, order, health, safety and general welfare of the state and its inhabitants. A division in the executive department is hereby created to encourage programs designed to . . . eliminate and prevent discrimination in employment . . . and to take other actions against discrimination as herein provided; and the division established hereunder is hereby given general jurisdiction and power for such purposes.⁴¹

Equality of opportunity is a civil right.⁴² For the women of Fox News, year after year, this right has been abrogated. The world knows about it, but press reports are not enough. Women's careers must be protected. We therefore respectfully request that the SDHR conduct a prompt, thorough investigation of the toxic culture at Fox News.

⁴¹ New York Human Rights Law Sec. 290.

⁴² New York Human Rights Law Sec. 291

Dr. Walsh will fully cooperate with any investigation. We as her attorneys offer to assist in any way we can. We believe that the many women who signed confidentiality agreements would welcome subpoenas from you so that they can share their stories.

Please do not hesitate to contact us.

RESPECTFULLY SUBMITTED,

Lisa Bloom

LISA BLOOM
FOR THE BLOOM FIRM