

September 19, 1977

Mr. Kevin D. Rooney
Director of Equal Employment Opportunity
U.S. Department of Justice
10th and Constitution Avenue, N.W.
Washington, D. C. 20530

Dear Mr. Rooney:

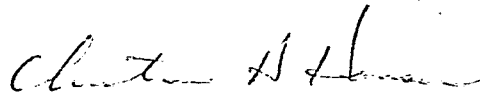
Attached hereto is a formal complaint of discrimination against the Federal Bureau of Investigation, on my own behalf and on behalf of the class of all women who have ever made application to the Federal Bureau of Investigation for the Special Agent position.

I am presently a Special Agent of the F.B.I., having been hired in November 1972 and am officially assigned to the Phoenix Division, but am on special assignment to F.B.I. Headquarters in Washington, D. C.

My representative in this matter is:

Mr. Alexander C. Ross
U.S. Department of Justice
Room 7724
10th and Pennsylvania Avenue, N.W.
Washington, D. C. 20530

Sincerely,



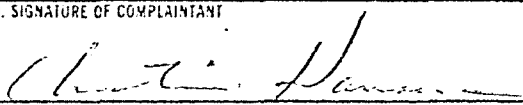
Christine A. Hansen

COMPLAINT OF DISCRIMINATION

1. AUTHORITY - The authority for this information is derived from 42 U.S.C. Section 2000e-15, 5 CFR Section 713.214, and 5 CFR Section 713.222.

2. PURPOSE AND USE - This information will be used to document the issues and allegations of a complaint of discrimination based on race, color, religion, sex, age, or national origin. The signed statement will serve as the record necessary to initiate an investigation and will become part of the complaint file.

3. EFFECTS OF NON-DISCLOSURE - Submission of this information is VOLUNTARY. Failure to furnish this information will result in the complaint being returned without action.

1. COMPLAINANT'S FULL NAME Christine A. Hansen		2. YOUR TELEPHONE NUMBER (including area code) HOME (202) 483-3598 WORK (202) 324-3559	
STREET ADDRESS, RD NUMBER, OR POST OFFICE BOX NUMBER 1325 Fern St., N.W. Washington, D.C. 20012			
CITY STATE ZIP CODE Washington, D.C. 20012			
3. WHICH DEPARTMENT OF JUSTICE OFFICE DO YOU BELIEVE DISCRIMINATED AGAINST YOU? (Prepare a separate complaint for each office.)		4. ARE YOU NOW WORKING FOR THE DEPARTMENT OF JUSTICE? ☐ YES (Answer A, B, C, and D below) ☐ NO (Continue with question 5)	
A. NAME OF OFFICE WHICH YOU BELIEVE DISCRIMINATED AGAINST YOU. Federal Bureau of Investigation		A. NAME OF AGENCY WHERE YOU WORK Federal Bureau of Investigation	
B. STREET ADDRESS OF OFFICE 9th and Pennsylvania Sts.		B. STREET ADDRESS OF YOUR AGENCY 9th and Pennsylvania	
C. CITY STATE ZIP CODE Washington, D.C.		C. CITY STATE ZIP CODE Washington, D.C.	
		D. TITLE AND GRADE OF YOUR JOB Special Agent GS 11	
5. DATE ON WHICH MOST RECENT ALLEGED DISCRIMINATION TOOK PLACE ongoing/daily -class individual: MO DY YR 6 29 77		6. CHECK BELOW WHY YOU BELIEVE YOU WERE DISCRIMINATED AGAINST. ☐ RACE OR COLOR (Give Race or Color) ☐ RELIGION (Give Religion) ☒ SEX (Give Sex) ☐ MALE ☒ FEMALE ☐ AGE (Give Age) ☐ NATIONAL ORIGIN (Give National Origin)	
7. EXPLAIN HOW YOU BELIEVE YOU WERE DISCRIMINATED AGAINST (Treated differently from other employees or applicants) BECAUSE OF YOUR RACE, COLOR, RELIGION, SEX, AGE, OR NATIONAL ORIGIN (You may continue your answer on another sheet of paper if you need more space). see attached			
8. WHAT CORRECTIVE ACTION DO YOU WANT TAKEN ON YOUR COMPLAINT? see attached			
9. DATE OF THIS COMPLAINT. MO DY YR 9 19 77		10. SIGNATURE OF COMPLAINANT 	

DOJ

FORMERLY DJ-201, WHICH IS OBSOLETE FORM DOJ-201A 5-24-75

INTRODUCTION AND SUMMARY

This is a class complaint, alleging discrimination in employment on the basis of sex, brought on behalf of myself, Christine A. Hansen, and the class of all women who have ever made application to the Federal Bureau of Investigation for the Special Agent position.

The first section of this complaint contains allegations of discrimination which have affected me personally, and the second section alleges discriminatory practices against the class as a whole at all levels, including specific examples (incidents affecting me and other women in the class).

The women included in the class complaint include:

(a) All women who are presently Special Agents of the FBI;

(b) All women who have been but are not now Special Agents of the FBI;

(c) All women who are rejected applicants for the position of Special Agent of the FBI, including those now or ever employed by the FBI in other capacities; and

(d) All women forced to resign from Special Agent training school, including those now or ever employed by the FBI in other capacities.

Prior to 1972, the FBI refused to accept applications from women for the Special Agent position. Until 1975, the Bureau had a 5'7" height requirement which likewise served to discriminate against women. From 1972 until the present the FBI has perpetuated its prior discrimination on the basis of sex through the use of intentionally discriminatory as well as arbitrary and irrational employment practices which make it more difficult for women than

men to become special agents or to remain as special agents and advance through careers in the FBI. In addition, discriminatory practices which have excluded women as special agents adversely affect incumbent female agents in that the low number of female agents (approximately 70 of 8,500) in itself fosters a climate in which discrimination against women flourishes.

Acts of discrimination against women engaged in by the FBI have included, but are not limited to:

Applicant recruitment

(a) Women have been and continue to be rejected for reasons of discrimination at the personal interview stage of the application process;

(b) Under the new applicant recruitment, a primary selection tool will be an agents test designed to hire agents whose personalities are most like those of present agents.

(c) None of the applicant testing or means of selection or rejection through personal interview has been validated for job-relatedness under approved validation guidelines.

(d) Background investigations under both old and new recruitment methods have been subjective and without measurable standards for acceptance or rejection.

Training

(a) Physical testing requires a higher standard of women and has never been correctly validated.

(b) Firearms testing requires a higher standard of women and has never been correctly validated.

Work situations

(a) Women are assigned to offices on the basis of sex, and transferred between offices on the basis of sex.

(b) Women have been systematically kept from assignments within offices which have higher prestige and generally assigned within an office on the basis of sex.

(c) Women have been denied promotional opportunities on the basis of sex.

MATTER GIVING RISE TO INSTANT ALLEGATION
AND DESCRIPTION OF RELEVANT PERSONNEL ACTION

I entered on duty with the FBI as a special agent on 11/20/72. I had an undergraduate and law degree from Drake University, Des Moines, Iowa and had been admitted on examination to the Iowa Bar. Upon successfully completing agent training at Quantico, Virginia, I was assigned to the Los Angeles office for two years, then to the Washington, D. C. office for nearly two years and then to the Phoenix, Arizona office since December 1976.

On June 29, 1977, I received a copy of my FBI headquarters personnel file upon proper request under the Freedom of Information Act. One page of my personnel file reflects that my transfer from the Washington, D. C. Field Office to the Phoenix Field Office was for the reason that I am a woman. Specifically, a transfer memo in my personnel file dated October 13, 1976, contains the following penciled note: "Per SAC N.F. Stames, WFO: He has 3 female Agts but feels only 2 are needed for office. SA Hansen has earliest EOD, has been in WFO longer than other 2, was in LA first office, changed OP to Alexandria, came to WFO but now carries LA as OP."

This transfer resulted in considerable unreimbursed expense (approximately \$1,200 in travel subsistence and upkeep of two residences since I could not lease my house in the District of Columbia), totally disrupted my life for no reason of government necessity (there was no particular need for one of my experience and background in Phoenix as my work assignment consisted of things

any agent with above average intelligence could handle), and terminated my schooling when I was one semester away from an LL.M. at Georgetown Law Center. Therefore, this personnel action adversely affected me in various ways.

GENERAL PATTERN OF DISCRIMINATION AGAINST WOMEN AS
A CLASS BY THE FEDERAL BUREAU OF INVESTIGATION

This discriminatory transfer policy is an explicit admission that women are treated separately and is indicative of a pattern and practice of discrimination against women agents and agent applicants which so completely permeates the Bureau that it is accepted and condoned from the highest level to the lowest level, from recruitment to advancement. The discrimination extends from overt discrimination such as my transfer to Phoenix and the forced resignation from training school of a disparate number of female agents, to the "more subtle, pervasive and institutionalized forms of bias" which the chairman of the Civil Service Commission spoke of eliminating from Federal employment in 1969. [50 Tex. L.Rev. 901, 924 (1972)].

While I believe that every woman who has applied to be an agent has suffered some form of discrimination based upon sex from the application time forward, there follow some specific instances of discrimination which are representative of the pervasive nature of this unequal treatment.

(1) Statistical Evidence of Disparate Treatment of Women

There are approximately 8,500 FBI special agents, of which 70 (or less than 1%) are women (all numbers are estimates based on my knowledge as the Bureau specifically refused to provide me with any of these figures. In telling me this, EEO specialist Ike Willis admitted such figures would be available to an agent who was not involved in a discrimination complaint, and, in fact, would be available to a citizen requestor -- in particular a Senator or Congressman). Approximately six women have resigned after having

successfully completed the agent training at Quantico. Approximately 25 -- one quarter of the total number of women ever hired by the Bureau -- have been "fired" during training at Quantico (all but one of these are formally recorded as "resignations" but all were told they were going to be fired and were given the "opportunity to resign" instead). While I was unable to obtain exact numbers for the men fired during training, it is my personal knowledge that it is not nearly a quarter of them, and is very likely not as high as even 10 percent.

These statistics reveal two easily discernible avenues of sex discrimination -- at the hiring stage and at the "training school" stage.

(2) Hiring Discrimination

Sex discrimination at the hiring stage is, from my personal but limited knowledge, of significant proportion. There are not, however, any statistics available as the Bureau does not monitor agent employment applications and has no idea how many women apply.

The Bureau is currently undergoing a revision of its hiring policy, but the new program has as much latitude for sex discrimination as the program employed for the instant group of discriminatees.

The former recruitment method involved four basic stages, with an applicant potentially rejected at any of the stages. First, an applicant was interviewed by an agent "applicant recruiter." If an applicant failed to make a good subjective impression on this agent, no further action was taken on the application. I know that the applicant recruiter for many years in the Los Angeles office told other agents he would never approve a woman. To my knowledge, no woman has ever been recruited from that office -- the second largest in the Bureau though I know excellent candidates applied. I do not know whether or not this claim was carried out; there were other persons who acted as applicant recruiter in the

Los Angeles office. I know that the applicant recruiter in the Washington, D. C. office turned a woman down because she was married. Because there are no reviewable standards, women can be eliminated at this initial stage without accountability.

The second applicant stage was testing -- a spelling test and a general intelligence test for applicants with a college degree -- or a law test for lawyer applicants. These were graded by the applicant recruiter and the results forwarded to the Bureau. The administration of these tests presented the opportunity for arbitrary and subjective selection of applicants; I have been told by various agents that they were "helped" with the spelling test by the applicant recruiter leaving the testing room during the test and leaving the spelling list within easy sight, or giving "hints" on difficult words.

The third stage of the applicant procedure was the interview with the Special Agent in Charge (SAC) of the office through which the applicant applied. An applicant could be rejected at this point if the SAC did not have a favorable impression. I know that SAC Startzell in the Los Angeles Office rejected a woman because she was married and that no more than one woman has survived this stage at the Los Angeles office.

The fourth stage (now the third) was the background investigation which can be as subjective as any of the other phases. For instance, my background investigation reveals that while all of my references recommended me highly, the three references interviewed by one particular agent are all recorded as having made the comment that I am "very feminine" and might have difficulty handling an extremely physical situation. Of course, it is obvious this interviewing agent dwelt upon this point with my references though it turns out that having the appearance of being able to handle a physical situation and actually handling such a situation are quite

different things -- and not at all related to the job of special agent. An applicant in a southern office (I believe it was Knoxville) was rejected on the basis of a background investigation interview with her doctor. The results were written to indicate that she had undiagnosed fainting spells in college, when her doctor had told the interviewing agents there was no specific cause for the fainting spells except fatigue and poor eating habits related to her having been on choir tour for several months.

If the background investigation is favorable, the applicant is cleared for a government physical. If this goes well, the applicant is placed on a waiting list for training school.

Under the new applicant procedure, to be instituted this fall, the steps are basically the same, but some of the subjectiveness is now codified in a new test which has not been validated.

The applicant is first given three tests -- an "agents test," a spelling test and an "achievement test" (or a law test for lawyers). The applicant's college grade point average is also taken into consideration to arrive at a total point value. The "agents test" carries half the weight in this overall score. This test is similar to the Minnesota Multiphasic Test. It was developed by the Bureau testing 1,000 present agents in selected small field offices (most women agents are assigned to large offices). An applicant gets a higher score on this test if the applicant answers in the same way as the majority of these present agents.

The effect of this test will be that the applicants scoring well will be those most like present agents, more than 99% of whom are male.

If the score from these tests is high enough, the applicant will be granted an interview with a three-agent applicant screening board. The team rates the individual and these results are forwarded to the Bureau. There is no SAC interview.

The applicant screening board consists of present applicant recruiters and agents specially trained in the recruitment interview technique. At the first training session for these agents in June 1977, the agent in charge of all training, M. A. McNerney, cautioned these agents that in selecting the best qualified applicants they must particularly screen out such persons as short women.

In the September 1977 issue of "Cosmopolitan" magazine a story about women agents notes that there is no longer a height requirement but concludes "physical stature is still taken into account." The writer quotes an unnamed "agent in charge of recruiting" as stating: "If the applicant is a woman and she's short, she'd better be plenty feisty. And willing to wait."

The background investigation and physical examination are done if the Bureau finds the applicant to rate highly as compared to other applicants.

(3) Training Discrimination

A second level of discrimination is shown by the disparate number of women who are fired during the training program at the Quantico, Virginia FBI Academy.

The training has three basic parts and a failure in any one will result in firing. The standards are facially neutral, but in the areas of physical training and firearms have a discriminatory result. The academic phase of training (consisting of law and Bureau procedure) can be quite subjective but I have no knowledge that it has been used to discriminate. The tests have in the past not been seen by the trainees after grading and I know that men in my training class were permitted to re-take tests as many as two

times to bring up their scores (the women in my class did not need assistance, so it is unknown whether aid would be provided to women).

The physical test was instituted when the Bureau began to hire women in 1972. Prior to that time agents were required to be in generally good physical condition, but were not rejected from training school for failure to meet some specific goal. I have been informed by many male agents that they could not have made it through training school if the post-1972 physical testing standards had been applied to them. These standards have changed slightly since 1972 in that points are now allotted to the various physical tasks and an agent must achieve a certain number of points, with a minimum acceptable performance for each task. (When I went through we were required to do the "maximum" in all items.) The tasks are: a 2-mile run, a shuttle run, 50 situps, 35 men's push-ups and 5 men's pull-ups (for pull-ups only, women are allowed to use a separate method and 15 women's pull-ups are required). There are physical differences between men and women which result in men having a different hip structure and body build. The center of gravity for women is much lower in the body, making men's push-ups extremely difficult for women. (Men's push-ups were termed dangerous for women by the physician of one woman agent due to the stress placed on a woman's sternum in doing this exercise.)

The difference in hip structure also accounts for a different running ability for women. There is simple source material for these statements. For instance, in Aerobics for Women (Mildred & Kenneth Cooper, M.D., pub. M. Evans & Co., Inc., and J. B. Lippincott Co., Philadelphia and New York, 1972, Library of Congress #77-164548) on page 28 states: "Another noticeable structural difference between women and men is, generally, our wider hips and the slightly different angle in the way the head of the femur (thigh bone) is set into the hip socket, giving our

walk a circular motion compared to the more straightforward action of a man's stride. Obviously, this affects our manner of running and our capacity for it." This text, a physical fitness program for both men and women, states on page 35: "... most women's total aerobic capacity is smaller than most men's in keeping with our generally smaller size." The author therefore concludes that women need only earn 24 points per week under this program to be as physically fit as the man who must earn 30 points per week to be physically fit. The result of the Bureau physical requirement is that women need to be in relatively better physical condition than men to become agents. As an example, one woman (who passed every other aspect of training) was forced to resign because she took 18 and one-half minutes for the two-mile run (30 seconds over the allotted 18-minute minimum).

In firearms training, women have also been subjected to different standards with a facially neutral test.

The firearms requirements have also undergone change: In 1972, when I went through training school, women did not train (nor were they tested) on the lighter weapon which was later issued to them for use in the field. We trained with the .38 with a four-inch barrel -- the weapon issued to all male agents. After training we were issued a 1-1/2 inch barrel, light weight weapon. Beginning in early 1973 women were trained with the lighter weapon and were required to achieve the same standard as males who used the heavier and thus easier weapon. It is more difficult to shoot accurately with a smaller weapon and the "kick" is much harder. Firearms instructors at Quantico say there is a 12 to 14 point disadvantage in a 100 point score if one is using the lighter weapon. Another weapon has since been issued to women which is relatively heavier, but still lighter and shorter than the revolver issued to males.

To my knowledge, all but one of the women fired from training school were fired for failure to achieve some part of the physical or firearms testing. To my knowledge these tests have never been validated. Based on my observations and experience as an agent for five years I do not believe these tests to be sufficiently job-related to justify their continued use to exclude otherwise qualified agents.

(4) Field Office Discrimination

In the day-to-day work of the Bureau, women suffer from a broad range of discrimination including: advancement, work assignment, and petty harassment from superiors.

Of the approximately 800 agents assigned as headquarters supervisors and above, only one is a woman. Few women are relief supervisors (the first step in Bureau advancement) and no women have been to the Bureau's Management Aptitude Program which is required for advancement to supervisor according to present standards.

My own case illustrates the difficulties women face in this area. Though I was interested in advancement and had expressed this interest to my supervisors, I was never considered for such. Until my last supervisor in Washington, all of my supervisors (after finishing my year probationary period) gave me excellent performance ratings and recommended me for administrative advancement. In December 1976 my WFO supervisor (Tony Booth) declined to recommend me for administrative advancement on the evaluation which is required just prior to a transfer. When asked the reason for this, Booth said I did not "get along" well enough with the men on the squad as I often worked alone (my work did not require a partner most of the time and my efficiency is higher when I work alone; in fact, most agent assignments do not require a partner) and did not appear to be friendly with many men on the squad (many spent hours each day sitting around talking about sports and women which topics I

found uninteresting and they also excluded me from their lunch meetings and private joking sessions -- after a while I got tired of always making the effort to ask to be included). Booth stated he had no complaint with my work and, in fact, found it to be quite good. But, he concluded no woman (he used the term "girl") could sit in his seat and supervise a squad of men -- and there will never be a squad of women so I'm not qualified to be a supervisor.

In terms of assignments within offices, there exists a pattern of discrimination exemplified by the Los Angeles office. Here, a comparison of assignments for first-office women agents and first-office men agents between 1973 (when I was assigned as the first woman in that office) and August 1977 shows that only one of the seven women had ever been assigned to a major criminal squad while 45 out of 63 men have worked major crimes. In response to the statistics gathered and presented by women agents, changes in assignments were made. The significance of this is that the prestige in the Los Angeles office (i.e., recognition, advancement, reward) comes from being a "case agent" on major criminal cases -- and if an agent is not assigned to a squad handling such matters, she cannot become a case agent.

In the Washington Field Office (WFO) the prime work is in the national security area. No woman has ever been assigned to any security squad. Both I and SA Claudia Rauch have been requested by security supervisors and demonstrated a desire for such assignment.

Both women presently assigned to WFO are serving on the applicant squad (widely considered to be the worst assignment in any office).

While I do not have statistics or assignments by sex for any other office, I believe examination of other offices would display similar patterns.

In addition to discrimination in advancement and assignment, women agents are subjected to petty harassments from officials because of sex. I will set forth some examples of which I have knowledge.

From my own experience, during the 1974 inspection of the Los Angeles office, my supervisor later told me, all of my cases for the year (usually only pending cases are examined for defects, not closed cases) were pulled for inspection. My supervisor (Harry Kerley) advised me they had found nothing wrong with any cases which could not be said if the same were done with other members of his squad. (During this year I was on special assignment on the Hearst case for about 3 months and still had one of the highest rates of conviction and arrest on the squad.)

After applying to be a Bureau legal instructor in 1974 and also indicating an interest in the Bureau language program (but not formally applying for it) SAC Startzell in Los Angeles told me (and then wrote a memo that is a permanent part of my personnel file) that he would never permit me to have specialized Bureau training as being a woman was my "specialty" and it would not serve the interests of the Bureau to have further specialty. (In 1976, I was trained as a Bureau legal instructor from WFO.)

It is my experience that much of our work can be most efficiently handled by one agent, but in some offices women have not been permitted to work alone. Yet, the pool of agents willing to work with women agents is small. The following example illustrates the hardship this situation works on female agents: During this year's inspection of the Kansas City office, SA Judy Brown was cited but not censured for missing an investigation deadline, despite her explanation that the delay was caused by her not being allowed to work by herself and being unable to locate another agent to assist.

Before SA Kay Kramer first arrived in the Cleveland office (1973), SAC Fehl had made it known he wanted no women in his office. She suffered a number of discriminations as a result of this, including her first supervisor telling the men on the squad not to take her along on arrests and SAC Fehl saying at an all-agent conference that if Kay could get three informants all of the rest of the agents should be able to get six.

A woman in one field office was given an official letter of censure from Director Kelley for having an abortion (the fact of which she had not attempted to hide).

- (5) Public Statements by Bureau Officials Down-Grading the Role of Women in Law Enforcement Foster Discriminatory Conduct Toward Women within the Organization

In August 1976 FBI Spokesman Edward Tulley told a group of southern sheriffs (according to the N.Y. Times, a copy of the article is attached) that they should refuse Federal LEAA funds since acceptance means "you have just tied your agency to federal (employment) standards" which require them to "haul in anybody" including women and minorities.

This speech, according to official Bureau statements had not been "approved" by headquarters. However, Tulley remains in his former position (instructor at the Quantico training academy), was not condemned by the Bureau, and continues to make the same kind of public statements. It was reported in the September 27, 1976 issue of the "Washington Post" that Tulley told a group of police chiefs: "One of the most destructive things in police work is male-female partners as far as breakups of families go." The fact that Tulley remains in this position implies that the Bureau has sanctioned his statements and this is a continued insult to women.

(6) Discrimination Against Women as a Class by the Bureau is
Compounded by the Bureau's Inadequate and Non-responsive
Equal Employment Opportunity Counselling Procedures

.My own experience shows the failings of these procedures.

On July 15, 1977, I contacted and made my complaint known in detail to the posted EEO counselor for my division -- Mrs. Jeanette Hite. She provided some initial counselling and said she would determine class action procedure in order to counsel in that area. (The Bureau had no posted class action counselor.) On July 20, 1977, I was called to the Bureau EEO office to meet with the head of that office, Wayne Davis, and Mrs. Hite. I again explained the basis of my complaint, and was told by Davis that Mrs. Hite could not be my counselor and the Bureau would select someone. I contacted the Bureau EEO office on July 22, 25, August 2, 3, 4 and 5 to inquire as to a counselor. On August 9, 1977, I was telephoned by Ray Burns of the personnel office that my counselor would be Wayne Davis and he would return from leave on August 15, 1977 and thereafter contact me. On August 10, 1977, Mr. Burns again telephoned me and advised that Deputy Assistant Director Pietsch would counsel me.

On August 11, 1977, Mr. Pietsch called me and we met for three hours that afternoon. It was my impression from that meeting that Mr. Pietsch had no real understanding of the counselling function and had as his entire aim the countering of my allegations.

I told him my problems, and the problems of the class of women who have applied for the special agent position, basically as I have laid them out in this complaint.

He countered various of my statements, though he had no knowledge of the facts. For instance, when I related SAC Fehl's comment to the Cleveland office about the man being able to have twice as many informants as the woman agent, Mr. Pietsch said Fehl was obviously saying new agents were not expected to have as many

informants as older agents (no mention of time in the Bureau was made by Fehl).

When the recent comment about screening out short women was mentioned, Mr. Pietsch said, "Well, no short women have made it through training." (The fact that the training discriminates against women was being used by him as justification to screen out short women.)

When the censure for the abortion was mentioned, Mr. Pietsch said that of course a man would be censured for "immoral" behavior also. However, he admitted this behavior was more easily detected in a woman.

When I discussed my old supervisor's unfavorable evaluation, Mr. Pietsch entered into a long discussion about how my refusal to sign the evaluation did not mean I disapproved of the evaluation and about how I had a remedy in this area by submitting a grievance concerning the evaluation.

When I mentioned the SAC who said I was already specialized as a woman and therefore could not be provided the opportunity to become a legal instructor, Mr. Pietsch said, "But you are a legal instructor now" thus dismissing the fact that I was not recommended to become a legal instructor while in the Los Angeles office.

In summary, my counselling experience provided no opportunity to resolve any of the problems I had raised on behalf of myself and other women; the procedure appears to hold no promise of obtaining equal employment opportunities for women within the Bureau.

REMEDY REQUESTED

I. Request for myself:

A. All travel expenses incurred in this discriminatory transfer; and

B. Expenses of mortgage and upkeep on my house in Washington,

D. C. which I had been trying for some time prior to leaving to

rent and which stood vacant for two months before I was able to get a tenant.

II. Request for the class:

A. An effective affirmative action program for women including hiring, job assignment and promotion goals;

B. Immediate discontinued use of all non-validated or incorrectly validated tests unless no sexually disparate impact is found to exist;

C. Immediate discontinued use of all non-validated selection procedures involving personal interviews unless it can be demonstrated that these procedures do not have an adverse impact on women as a class;

D. In the alternative, if validation of the new "agents test" or any objective test is obtained, the selection or rejection of applicants through personal interviews should be discarded or held in abeyance until either (a) it is determined that the personal interview procedure does not have an adverse impact on women or (b) the personal interview has been separately validated as an instrument of selection;

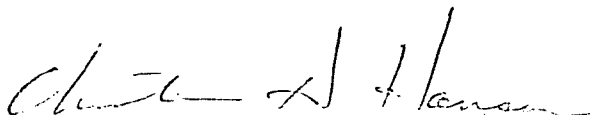
E. The development and implementation of non-discriminatory objective and reviewable hiring, training, assignment and promotion standards;

F. Hiring (or re-instatement), retroactive seniority and back pay for all members of the class who are qualified under the standards described in C. and who were denied employment opportunities for discriminatory reasons;

G. Restructuring of the Bureau EEO office (perhaps necessitating a transfer of the EEO office to the Department of Justice) so that there is no chilling effect on those desiring to file an EEO complaint. This restructuring must include a

record-keeping system to reflect the number of women applying for the special agent position and their progress through the applicant procedure, training, career advancement and work assignments.

Date: 9/17/77


CHRISTINE A. HANSEN