UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

ANNE POPE, et al.,

Plaintiffs,

VS. :

COUNTY OF ALBANY, et al.,

Defendants.

No. 11-cv-0736 (LEK) (DRH)

DECLARATION OF KATHY SHEEHAN

- I, Kathy Sheehan, hereby declare the following:
- I am a Caucasian woman over the age of eighteen residing in Albany City, New York. I give this declaration based upon personal knowledge.
- 2. I am currently serving as the Treasurer for the City of Albany (the "City"), a position that I have held since January 1, 2010. As the City Treasurer, I am responsible for the payment of all vouchers, claims, payroll and other authorized disbursements.
- 3. In May 2010, the Albany Common Council, which is the legislative body responsible for setting the governing policies of the City, asked me to produce a report showing, among other things, a breakdown of the City's employees by demographic and department, and their respective payroll figures.
- 4. My findings showed payroll disparities among minorities and whites in the City's workforce.
- 5. In 2009, Blacks constituted 16% of the City's total employees, and 11% of its total payroll. Whites constituted 81% of the City's total employees and 87% of its total payroll.

- 6. In 2009, Blacks constituted 15% of the City's Police Department, and 10% of its total payroll. Whites constituted 82% of the Police Department's total employees, and 88% of its total payroll.
- 7. In 2009, Blacks constituted 27% of the City's Department of General Services and 23% of its total payroll. Whites constituted 69% of General Services' total employees, and 73% of its total payroll.
- 8. In 2009, Blacks constituted 29% of the City's Department of Recreation, and 21% of its total payroll. Whites constituted 69% of Recreation's total employees, and 76% of its total payroll.
- 9. In 2009, Blacks constituted 17% of the City's Department of Youth & Workforce Services, and 13% of its total payroll. Whites constituted 79% of Youth & Workforce Services' total employees, and 83% of its total payroll.
- 10. In 2009, the City's Water and Fire Departments were the only departments without a payroll-to-workforce population disparity of more than 2% for Blacks. These departments employ the lowest percentages of Blacks of all major department workforces, at 13% and 5% respectively.
- 11. In 2009, Blacks constituted 16% of all departments in the City other than those aforementioned (consistently of mostly administrative positions at City Hall), and 12% of its total payroll. Whites constituted 81% of the total employees in all departments in the City other than those aforementioned, and 86% of its total payroll.
- 12. In July 2010, I presented a report of my findings to the Albany Common Council, pursuant to their request. A true and correct copy of this report is attached as Exhibit 1.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 15, 2011

Kathy Sheehan