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March 11, 1994

Nancy Duff, Co-President
National Women's Law Center
1616 P St., NW
Washington, DC 20036

Re: Sexual Attack by Choctaw Chief
on female employees

Encl: (1) Complaint
(2) Defendant Roberts Motion to Dismiss

Dear Ms. Duff:

I am writing in reference to an outrage that may interest your organization. I represent Kobi Dawn Russ, who was sexually attacked by her boss at work. Ms. Russ' boss is Hollis Roberts, the longtime Chief of the Choctaw Nation.

Let me briefly explain the facts of this controversy. On July 15, 1992, Ms. Russ became employed with the Choctaw Tribe. The employment was paid exclusively by federal funds for a particular program. During Ms. Russ' employment she was in part accountable to Mr. Roberts.

In September of 1992, Roberts and Ms. Russ were at a meeting in Durant, Oklahoma. Roberts called Ms. Russ outside when they were alone. Roberts patted Ms. Russ' rear and said, "You take care of me and I'll take care of you." Roberts continued his sexual harassment of Ms. Russ throughout the remainder of her employment. Roberts called Ms. Russ on the phone, making sexually explicit comments. Roberts eventually became so bold as to grab physically and sexually assault Ms. Russ in tribal offices.

Ms. Russ complained to her immediate supervisor. Instead of support, Ms. Russ was told not to pursue her claims.

During my involvement in this case, I have uncovered evidence of a separate series of sexual attacks committed by Roberts against another female employee. This employee was actually the victim of an attempted rape by Chief Roberts. This other woman even complained to the F.B.I., but was stonewalled at every turn.