

AFFIDAVIT

My name is Sharon Louise Mareello. I am submitting this statement freely and voluntarily, without any inducements, threats or promises of rewards, to Ms. Billie Garde, who has identified herself as an investigator for the Government Accountability Project of the Institute for Policy Studies. I am giving this statement because I am upset at the blatant disregard the Zack Company has shown toward public health and safety implications of its business practices. I personally cannot accept that practices like those I saw at Zack are tolerated in the nuclear power industry.

I am the mother of two daughters, aged 10 and 13. My husband and children and I live in a Chicago suburb. I grew up in Oak Park, Illinois where I graduated from high school. After high school I worked in two clerical positions until I stopped working to be home when my daughters were babies.

I was interviewed by Zack and hired in early fall -- beginning October 5, 1981 -- as a Documentation Control Clerk in the Chicago office.

My job was to log in all the mail, such as purchase orders, correspondence from the sites, Certified Material Test Reports ("CMTRs"), and certifications of compliance. I also added mail to the files, and kept purchase order packages up-to-date. Zack had contracts with the nuclear power plants at Midland, Clinton and LaSalle. I worked with document packages for all these projects.

Soon after I began working at Zack, I was charged with the responsibility of setting up the files in fireproof cabinets. Prior to my arrival there had not been a formal Quality Assurance Document Control function. I was told that for years Zack had one person handling Quality Assurance, but it did not have a documentation control department.

The document packages were three-tier folders that were supposed to be set up for every purchase order. The packages were supposed to contain all of the correspondence and information pertaining to each purchase. In this way it would be possible to pull a purchase order package and trace the entire history of the material concerned.

When I began work at Zack, the paperwork packages were put into manilla folders, then into two black file cabinets. I later learned that all of this information was supposed to be in locked, fire-proof cabinets.

One of my early jobs was to hunt for missing certifications or other material traceability records. The records were in disarray, to say the least. I had to look in desks, desk drawers, cabinets, "in" baskets and file drawers. in several different areas at Zack. Everywhere I looked I turned up paperwork, purchase orders, material certifications, and correspondence. Several weeks of hunting were needed before the papers could begin to be organized. Our department attempted to match up purchase orders with correspondence, material certifications with purchase orders, and place the information in the purchase order packages.

I also saw that there was no control over nuclear purchase orders, as opposed to commercial orders that had more lax quality verification requirements. Purchase orders were generated by a purchasing agent. When a purchase order was needed, it was taken off the top whether it was for nuclear or commercial use.

When I started working at Zack, Mr. Howard McGrane of the Midland Project Quality Assurance Department was our team supervisor. He showed all of us the requirements of the American National Standards Institute ("ANSI") standards N 45 2.9 and 2.11. ANSI standards are instructions on how to keep documented records. Howard McGrane introduced us to ASTM and 10 CFR 50. That was the only training we ever received, and it was more in the line of

"on-the-job training" than formal instruction.

There was a lot of interference with our department from several top level Zack management people. Although Zack had hired our department to do a job, it was as if we were an outside enemy. At one point one of the Vice-Presidents wrote a letter to Christine Zack DeZutel stating that our department was demanding too much documentation, and that our proposed traceability rules were too strict. After I saw a copy of the letter, I wrote a response, detailing instances where government regulations called for the very procedures the Vice-President was complaining were unnecessary. This type of management harrassment and/or intimidation was very demoralizing to our department. Our supervisor Terry Howard was extremely conscientious and helped build morale in our office.

By mid-November, we had succeeded in assembling most of the paperwork for the P.O. packages. Unfortunately, our team supervisor, Mr. McGrane left just at the point when we needed help in beginning actually to review all the documents. I have seen a letter from Christine Zack to Jim Cook at Consumers Power Co., thanking him for finishing a "complete audit" of the Zack quality assurance documentation. That was not true. To the best of my personal knowledge a complete audit is still not finished at Zack.

Our department was to do more than just collect and organize Quality Assurance documents. We were then to inspect each document for signs of improper alteration or tampering. My inspections revealed one very common alteration. More than 2,000 Purchase Orders were required to contain certification and specifications data from the manufacturer. A number of the CMTR's I inspected were altered. For instance, the required numbers had been passed on later with "stickers" and signed with the name of the original ordering individual from Zack. However, the signatures did not match. Apparently

the original CMTR's didn't have enough information on them, or the wrong information for them to be altered in this way.

I saw the stickers and corrections on the CMTR's soon after I started working at Zack. After I was fired, I learned that someone had panicked when Consumers Power Co. had been fined for Zack's failures. Someone had then gone into some of the files to "fix or correct" the various purchase order packages so that the NRC or the utilities would not discover the truth about Zack's handling of their nuclear site contracts.

We worked overtime, six days a week, on the documentation review for the Commonwealth Edison plant at LaSalle. In November, the clerks were told to start writing up non-conformance reports ("NCRs") on each discrepancy we could not account for. I objected to doing this because I knew that a NCR was an important document that was supposed to describe the deficiency in the material or the paperwork. I was not qualified to make a resolution or excuse for problems like missing certifications. In many cases engineering training was required to make a judgment. However, Zack was under pressure from Commonwealth Edison, and insisted that the LaSalle records be pushed through as quickly as possible.

Commonwealth Edison kept demanding a complete document audit, at first requesting that it be performed by December 1, 1981. A report of this size just couldn't be done that fast. Mr. Calkins had us do interim reports instead.

The pressure didn't come only from Commonwealth Edison. Martin Skates, newly appointed Quality Assurance manager, told us that we needed a final report for LaSalle by the end of February 1982. Terry Howard refused to give a final report. It was impossible for us fully to review 300 Purchase Orders on the LaSalle plant by the end of February. Instead, Mr. Howard wrote a fifth interim report for LaSalle. Commonwealth Edison wanted to load fuel by March 15,

and the pressure to finish our review was intense.

In early March, Andrea Crawley, a Quality Assurance Documentation employee from Clinton, was assigned to our department. After meeting with Mr. Howard, she stated to us that she wasn't familiar enough with our procedure to be able to help us. She also stated to us that Mr. Skates had told her that Christine DeZutel considered the department a mess and that Andrea should try to straighten it out.

Andrea Crawley stayed only one week before returning to Clinton. After she left, Mr. Howard told me that she had reported to Ms. DeZutel on our department, and that she had advised him that the report was favorable to us. Ms. Crawley also told me before she left that she was amazed at how much pressure we operated under.

Around this time the situation had an irreversible impact on my health. I became increasingly exhausted and listless, and often had short periods of "black outs" in my memory. After a particularly bad incident, my husband took me to the doctor and I was immediately hospitalized. Tests that were then taken showed that I had become hypoglycemic. I was ill and away from work for nearly a month. By the time I returned to work, I had greatly improved and felt nearly normal. But at the end of my first week back, I again began to suffer from a dramatic drop in my blood sugar count.

My doctor wanted me to quit my job because of the tremendous pressure I was under and the effect that it had on my health. I decided to try and "stick it out", hoping that things would get better because I needed the office experience for possible future employment in the nuclear field.

During mid-April, it became apparent that the Quality Assurance Department was losing control of its responsibilities. Management personnel, largely unauthorized to do Quality Assurance documentation reviews, increasingly were helping themselves to the files. Paperwork began to disappear from purchase order packages. When we refused to "sign some item off" as closed or insignificant, management would do it instead.

In late April we were informed that the Nuclear Regulatory Commission "demanded" all the nonconformance reports be closed out by the first of May for the Clinton plant. Baldwin Associates, the contractor for Clinton, began demanding the same type of detailed lists as Commonwealth Edison. The management pressure to overlook problems and rush through the alterations and identification of incorrect information on the purchase orders was extremely intense.

This really bothered all of us. We talked among ourselves about the potential dangers that using the wrong type of material could cause in a nuclear plant and the danger of not being able to establish the traceability of some shipments. We discussed the need to respect the codes developed for construction of nuclear power plants. The codes were established to ensure that plants are built safely.

Mr. Howard decided to pursue these concerns. On April 13, 1982, he called Hank Leonard of the Midland Project Quality Assurance Department. Although I did not hear the conversation, Mr. Howard later told me about it. We discussed the possible consequences if Mr. Leonard did not "come through" as he promised Mr. Howard he would. However, we believed that the personal consequences of telling the truth were much less than the consequences of a nuclear power plant built with shoddy material.

I knew that Mr. Howard already had represented the feelings of the entire department to David Calkins, Martin Skates and Ray Basiaga of Zack. Their response was only to listen and then drop it without investigating further.

I am also aware through departmental discussions and personal conversations that Mr. Ron Perry, a "job shopper" who had worked for us for a few months, had gone to Christine Zack DeZutel personally. In fact I pulled

several "questionable" files for Mr. Perry to show her. All of those contacts led to nowhere.

In April we obtained a copy of a letter to one of the Zack Vice-Presidents from a sub-tier vendor. This letter was to clear up missing certifications, or specifications. Instead of the vendor verifying information on material it had sent to Zack, the vendor attached a blank form. The letter, which I have read, told Zack to just "fill in the information" that Zack needed. That was the final straw.

I supported Mr. Howard's move to call Mr. Leonard because I believed that there was no other way to get the Zack management to accept the commitments that they had made. I hoped that by notifying the Midland Project Quality Assurance Department there would finally be a concerned and interested party reviewing the problems we had faced. Unfortunately, I was wrong.

Mr. Leonard came down from Midland following the April 15th official allegations of quality assurance breakdown and intimidation of Quality Assurance personnel.

Approximately a week and a half after the MPQAD visit, the entire Quality Assurance Department staff was dismissed or terminated. On Friday, April 30, 1982, at 2:30 P.M. we were all told that "our services were no longer needed."

To the best of my knowledge there was never an NRC investigation at the Zack site during my employment there. Although the various contractors and utilities are aware of the problems at Zack, none attempted to learn the full effects of problems of long-term quality assurance default.

I also believe there should be a review of Zack welder qualification records. I was told while employed at Zack that the company and the sites play this "little game". Zack says the site has the welder qualifications

and the site says Zack has them. I was told by Raymond Basiaga that the welder qualifications did not need to be kept in the files.

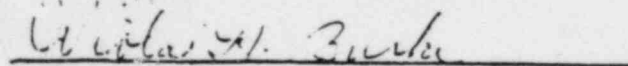
Although I was often told by management that HVAC systems were unimportant to the operation of a nuclear plant, my own research does not confirm that. I learned that the HVAC systems are responsible for filtering the radioactive material out of the air and for keeping the control room of the plant habitable in the event of an accident. Although I am not an engineer, I learned that many of the HVAC systems are safety related.

Further, I believe that much of the material is suspect because of many problems our Quality Assurance Department verified. I am giving this affidavit because I am concerned about the effects on safety for the plants built with Zack products. Further, I do not believe that the Nuclear Regulatory Commission -- which has had the evidence Mr. Howard gave to them since May 3, 1982 -- is going to do anything significant about this problem unless we speak out publicly. I came to this conclusion because they didn't act when Mr. Howard approached them privately. I am willing to speak to the Nuclear Regulatory Commission, the Justice Department, Congress, the press or any others who will work to see that the nuclear quality assurance and criminal laws are enforced at Zack.

I have read the above 8 page affidavit, and it is true, accurate and complete to the best of my knowledge and belief.


Sharon Louise Mareello

SUBSCRIBED AND SWORN TO ME
on this 26th day of July, 1982.


Notary Public

VIOLA H. BURKE
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires January 2, 1983

Perry

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies

1901 Que Street, N.W., Washington, D.C. 20009

(202) 234-9382

MEMORANDUM

TO: Thomas Devine, Legal Director
FROM: David Crow, Legal Associate
RE: Verification Statement from Witness Ron Perry

I contacted Ron Perry to discuss with him his experience as a member of the Quality Assurance Documentation Team at Zack Headquarters in Chicago, and to obtain his observations on a draft statement by Albert T. Howard, an associate of Mr. Perry's at Zack. I read Mr. Howard's affidavit to Perry, who confirmed every conclusion. He said he had worked closely with Perry and thoroughly respected both his integrity and reliability.

Position

Mr. Perry was employed at Zack from September 8, 1981 to February 19, 1982, to serve as part of a team responsible for reviewing purchase orders for equipment supplied by Zack to nuclear plants at Midland, Clinton, and La Salle. Mr. Perry was hired with the understanding that his position would be temporary, to last from three to six months.

Qualifications

Mr. Perry worked 14 years in the Air Force as a technician. His basic experience was in Quality Control ("QC") testing, and Non-destructive Examinations ("NDE") in particular. He also worked for Ebasco Services and later for Commonwealth Edison at the Byron nuclear plant doing audits and NDE field work. He began work at Zack through Quanteck company as a member of the documentation corrective action team.

Mr. Perry spoke with me at length and agreed to supply an affidavit, which I will prepare. He covered numerous topics during our two hour conversation. For example, to illustrate the uncontrolled access to documents, he discussed the wanderings of the owner's dog. Quality Assurance ("QA") documents were piled on the floor and the dog chewed some of them up. Highlights of the interview follow.

Management Attitude and Nature of Project

Throughout the time Mr. Perry was at Zack, management exerted tremendous pressure to finish their review of questionable QA documentation, especially at LaSalle. Interim reports were often assigned to assuage one of the utilities on particular problems. These interim reports pushed the completion dates for final reports even farther into the future. Always the result of a rush order, the interims regularly were inaccurate and in need of revisions. Despite the pace, deadlines were routinely missed, and pressure would intensify.

Particular Reports, Their Deadlines and Conclusions

On October 9, 1981, Dave Calkins sent a report to the utilities based on Mr. Perry's work. Problems cited included 1) "certifications altered", 2) "white

out used and retyped", and 3) "heat numbers altered to agree with certifications". Along with the report, Mr. Calkins promised a final report by October 26. This deadline was not met.

A "third interim report," dated October 23, 1981, accurately identified problems with material certifications, improper access to documents, and unauthorized modifications.

The third Interim Report reviewed 1,000 - 1,200 purchase orders ("P.O."). At least 2,000 remained to be done, and more were being discovered every day in desk drawers and odd corners. As Mr. Perry summarized, "God knows how many there are. We kept finding them." Because of the volume of unreviewed P.O.'s, a December 1 deadline promised by Mr. Calkins in response to a demand by the owner of LaSalle Commonwealth Edison ("Comm Ed"), that a report be ready November 13, passed unment.

Bechtel, the contractor at Midland, wrote on December 21 that it was satisfied that Zack had ordered correct materials, and that Zack vendors had intended to comply with Zack P.O. requirements. No report by Zack's QA department supported this conclusion, according to Mr. Perry. It was, however, in accord with opinions expressed by Mr. Calkins to Mr. Perry and others at Zack.

Specific QA Breakdowns

Mr. Perry worked with Terry Howard to compile lists of P.O. discrepancies in an effort to force management to begin filing Non-compliance Reports ("NCR"). A few examples drawn from Mr. Perry's experience will suffice.

- 1) Breakdown in QA for certifications that vendor steel met ASTM standards.
- 2) Document alteration through use of stickers on P.O.'s. Signatures on stickers appeared forged on several sets of U.S. Steel P.O.'s among others. Lists of these alterations were compiled for the Interim Reports.
- 3) Zack subtier vendors were requested to supply missing P.O. information. Mr. Perry sent out these requests, few of which had received replies by the date of his departure. Several vendors had gone out of business. U.S. Steel responded, stating that subject P.O.'s had not originally been designated safety-related; consequently, they had not received Verification and Testing required for such equipment. Audit of vendors by John O'Connell resulted in a purge of Edgcomb from the vendor list. This list of approved vendors was, however, inaccurate. Mr. Perry compiled a list of P.O.'s reviewed by Delta Screw Co. while Delta was not on the list.
- 4) Paperwork on small hardware like that supplied by Delta was in hopeless condition. Generally, the hardware did not have any specifications at all. As a result, chances of their meeting safety-grade specifications were slight.

- 5) When paper assurances failed, management resorted to material testing. Sample cutting and testing suffered from confusion and duplication of effort.

Internal and External Audits

Internal QA auditors were poorly trained and qualified. Ken Shaeffer received

page three
Verification
Ron Perry

only a one-week training seminar at Midland.

Outside audits were superficial. An October 9th Comm Ed audit was conducted while Mr. Perry was absent although he had been in a key role on the LaSalle project. Howard McGrane later told him the audit had been a farce. Terry Howard had been interviewed only briefly and few documents were reviewed. A Baldwin audit performed on February 16-18 confronted Mr. Howard with a promise made by Mr. Calkins by the auditors that a training program would be established by February 15. Mr. Howard admitted no such program had been established. Throughout Mr. Perry's tenure, no formal training program existed, Christine Zack DeZutel's promises to the contrary.

Persons Contacted by Mr. Perry About Problems at Zack

In January and February, Messrs. Howard and Perry met several times with Calkins and Martin Skates, who later succeeded him as QA manager. Nonconformances in P.O.'s and examples of unapproved vendors were met with management unconcern and inaction.

As a result, during Mr. Perry's final week at Zack, he contacted one his former Comm Ed superiors, Walter Shuski. In a phone conversation that was supposed to be confidential, Mr. Perry told Mr. Shewski about some of the problems at Zack. Mr. Perry's intent was simply to alert LaSalle informally. Mr. Shewski, however, relayed this conversation to Zack. This resulted in a week of intense recriminations for Mr. Perry.

Mr. Perry's exit interview was conducted with Christine Zack DeZutel, Joe DeZutel, Skates, Calkins, and Don Malzahn present. Mr. Perry stated his opinion on problems at Zack. Calkins demanded that Mr. Perry state who was responsible. Mr. Perry named Carl Eichstaedt, who he explained was too production-oriented, and ordered material delivered regardless of the adequacy of documentation.

Mr. Perry did not contact the Nuclear Regulatory Commission ("NRC"). Although Mr. Howard did contact the NRC with Mr. Perry's allegations, Mr. Perry has never been contacted by the NRC. Mr. Perry agreed to speak with whomever will effectively pursue Mr. Howard's allegations.

Dartley

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies

1901 Que Street, N.W., Washington, D.C. 20009

(202) 234-9382

July 25, 1982

MEMORANDUM

TO: Louis A. Clark, Executive Director

FROM: Billie P. Garde, Citizens Clinic Director

RE: Allegations against the Zack Company, Subcontract Supplier to the LaSalle/Midland/Clinton Nuclear Power Stations

SUBJECT: Verification Witness - Dean Dartey

GAP has been in contact with Dean Dartey, former Quality Confirmation (QC) Inspector for the Zack Company at Midland Nuclear Power Station, on numerous occasions over the last three months regarding the NRC investigation of charges against his former employer.

Over two years ago, in March 1980, Mr. Dartey had provided the NRC Region III Staff with twenty (20) allegations concerning the Zack Company, which was and is the Heating, Ventilating and Air Conditioning (HVAC) subcontractor at the Midland site. His allegations dealt with material traceability deficiencies, violations of procedures, falsification of documents, and inadequate training of QC inspectors.

The NRC investigation of Consumers Power Company's Quality Assurance (QA) Program relative to Zack's activities at Midland was conducted by seven NRC investigators during the period from March 6 to July 31, 1980. The results of the investigation substantiated twelve of the allegations provided by Mr. Dartey and three other individuals. Ten items of noncompliance were identified regarding Zack's activities, including numerous examples of failure to maintain material control and traceability and procedural violations. One item of noncompliance was identified showing failure of Consumers Power to promptly correct failures, deficiencies, deviations, defective materials and equipment and nonconformances regarding the HVAC work. The NRC investigation of Mr. Dartey's allegations led to the imposition of a \$38,000 fine against Consumers Power.

In addition to disclosures to the NRC, Mr. Dartey filed a Department of Labor (DOL) complaint against the Zack Company because after he spoke to the NRC he was suspended and then fired one month later. Mr. Dartey prevailed in his DOL action in June 1982. Zack had given six reasons for its personnel action against Mr. Dartey. The DOL administrative judge summarily dismissed three of the reasons for lack of substance. The judge found that two of the remaining reasons, based on the removal of original personnel documents from the company premises, may have been a valid basis for his dismissal, but did not base his decision on these reasons. Mr. Dartey maintained the position on these two counts that he had removed the personnel documents in order to

Memorandum to Louis A. Clark
July 25, 1982
Page Two

comply with the NRC investigators' expressed need for the documentation in order to substantiate the allegations. The judge rested his decision in favor of Mr. Dartey on the fact that the remaining reason given by Zack for dismissing Mr. Dartey was insufficient grounds for dismissal under DOL regulations. Mr. Dartey was awarded one month's back pay for the period between his suspension and firing. Zack is appealing the DOL decision.

Recently, Mr. Dartey gave an affidavit to GAP in reference to GAP's Midland probe. His affidavit was submitted to the NRC at the end of June 1982. His affidavit includes the following analysis of the NRC investigation of his charges two years ago:

In retrospect I would have a difficult time convincing a person in a similar situation that filing a complaint would be without great sacrifice. The task of convincing the NRC investigators and the subsequent in-house witch-hunt, coupled with the risk of inevitable financial trauma creates a situation which all too well accommodates the interests of the involved companies.

Until the NRC and the Department of Labor take a hard-line on the protection of whistleblowers, public exposure of safety problems will be very much the exception rather than the rule.

Mr. Dartey is aware of the new charges GAP is now bringing against his former employer, the Zack Company, and feels they confirm his on-site observations regarding hardware problems and the failure of Zack to honor QA/QC standards two years ago. He told me he is not surprised that the new charges are coming out now because he thinks the NRC investigation of his allegations over two years ago was not aggressive enough and failed to uncover the true scope of his charges. He said that the NRC improperly limited its investigation to check out only the specific examples he was able to provide them to support his allegations, rather than probing deeper into the full extent of the problems. In his opinion, if the NRC investigation had been as comprehensive as it should have been, the utility would have been fined much more than a modest \$38,000 and it is probable that Zack would have been shutdown as the subcontractor to the nuclear power stations two years ago. Now, instead of involving one nuclear plant in the probe of Zack's activities, three stations are implicated.

Mr. Dartey has also had occasion to view the documents supporting the current GAP probe of Zack's activities. He was shocked and appalled to find Purchase Order No. C-642 mentioned in a list, included in the March 1, 1982 LaSalle report, of nonconformances considered to have "a discrepancy that may possibly reflect on the integrity of the materials concerned." This particular purchase order was a key piece of documentation cited by the NRC as part of the evidence on which it based its January 7, 1981 Notice of Violation and fine against Consumers Power following the Region III investigation at Midland. He said it is incomprehensible that the NRC is now willing to accept this discrepant purchase order in the case of LaSalle when it would not accept it at the Midland site two years ago. He seriously questions the propriety of NRC's willingness to lower the standards by accepting a nonconforming condition because a plant is close to its operating deadline.

Memorandum to Louis A. Clark
July 25, 1982
Page Three

Mr. Dartey has talked to Arthur Howard about the current allegations against Zack. Although Mr. Dartey was involved with Zack's Quality Confirmation Program at Midland and not directly with quality assurance, he has been subjected to similar personal consequences now being faced by Mr. Howard for pointing out the truth to the NRC. He feels both he and Mr. Howard were fired for bringing problems to the attention of in-house and Consumers Power management. He questions whether two years ago the NRC investigated his disclosures properly since GAP is now coming forth with significant allegations that tend to show the NRC improperly did not investigate Mr. Howard's disclosures this year.

BPG/mcy

Protected
Witness

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies

1901 Que Street, N.W., Washington, D.C. 20009

(202) 234-9382

MEMORANDUM

July 25, 1982

TO: Thomas Devine, Legal Director
FROM: Billie Garde, Citizens Clinic Director
RE: Allegations Against Zack Company: Protected Witness

Date: July 12, 1982

The witness is a current employee of the Zack Company at the Midland site. He spoke with me on condition that he remain unnamed.

The witness said that he worked on the night shift at the Midland plant. He said that in October, 1981 he and another worker were in the Radwater Building lunchroom. The men were on break and they took a walk down a tunnel. No signs were posted outside or inside the tunnel. The witness said that after almost a minute and a half, they came upon Consumer Power employees x-raying welds. The witness said that he and his friend ran back out when they saw the x-raying.

The witness said that they were reprimanded for walking in an off-limits area. He stated that when they protested that neither Zack nor Consumer Powers had posted any signs, he and the other man were laid off for nine months. The witness asked what the exposure level had been and requested a physical examination. The witness was told that the exposure was equivalent to lying all day in the sun.

Both the witness and the other man are concerned about the situation but are unwilling to come forward as named witnesses. Since they already have lost nine months of work, both men fear for their job security.

Verifications

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies

1901 Que Street, N.W., Washington, D.C. 20009

(202) 234-9382

MEMORANDUM

July 25, 1982

TO: Thomas Devine, Legal Director

FROM: Billie Garde, Citizens Clinic Director

RE: Verification of Allegations in Sharon Mareello's July 26, 1982
Affidavit: Sue Hughes

Sue Hughes has been a friend and neighbor of Sharon Mareello for many years and worked with her for nine months at the Wishing Well restaurant.

Ms. Hughes described Ms. Mareello as a good friend and neighbor. She said that Ms. Mareello is an understanding person who cares a great deal about helping other people.

Ms. Hughes said that on several occasions Ms. Mareello had helped her with domestic and neighborhood crises, especially involving children. Ms. Hughes described Ms. Mareello as calm during a crisis. She said that Ms. Mareello generally handles problems well.

Ms. Hughes stated that Ms. Mareello is honest. She said that the job at Zack Company was difficult for Ms. Mareello because she was uncomfortable with the dishonesty at the plant. Ms. Hughes said that it would be unlike Ms. Mareello to ignore wrongdoing once she discovered it. She said that Ms. Mareello is idealistic in her honesty and her decision to expose the improper practices was wholly consistent with her character.

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Institute for Policy Studies

1901 Que Street. N.W., Washington, D.C. 20009

(202) 234-9382

July 25, 1982

MEMORANDUM

TO: Thomas Devine, Legal Director

FROM: Billie Pirner Garde, Citizens Clinic Director

RE: Verification of Allegations in Sharon Marello's Draft Affidavit

Verification Witness: ARNETTA SINACORE
Date of Verification: July 12, 1982

Arnetta Sinacore is an employee of the Wishing Well Restaurant in Cicero, Illinois, where she has worked for ten years. Ms. Sinacore was Sharon Marello's supervisor at the restaurant and has known Ms. Marello for four years.

Ms. Sinacore stated that she was totally satisfied with Ms. Marello's performance as a waitress. She said that Ms. Marello did consistently good work. Ms. Sinacore described Ms. Marello as a pleasant, easygoing woman who was generally well liked at the restaurant.

Ms. Sinacore considers Ms. Marello to be of highest personal integrity. She stated that she never had reason to doubt Ms. Marello's honesty under any circumstance. Ms. Sinacore said that overall Ms. Marello was the best waitress who had ever worked for her. She stated, "If Sharon said it happened, I believe it."

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