

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

STELLA SOSA WOLF,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 21-cv-3273
	)	
SAINT ANTHONY HOSPITAL,	)	
an Illinois corporation,	)	Jury Trial Demanded
	)	
Defendant.	)	

**COMPLAINT**

Plaintiff Stella Sosa Wolf, by and through her attorneys Loftus & Eisenberg, Ltd., and for her cause of action against Defendant Saint Anthony Hospital states as follows:

1. Stella Sosa Wolf (“Wolf”) joined Saint Anthony Hospital (“SAH” or the “Hospital”) as its Chief Human Resource Officer (“CHRO”) and Vice President, Human Resources in 2016 prepared to lead and support the organization in fulfilling its vision “to inspire change through services that improve the overall health of our community.” Despite her outstanding performance and service to the Hospital, Wolf could not overcome SAH’s gender biased, politically corrupt, and retaliatory employment practices, which ultimately resulted in her termination from the Hospital following her complaints about the President and Chief Executive Officer (“CEO”) Guy Medaglia’s (“Medaglia”) inappropriate and illegal behavior towards women and insistence on hiring politically connected employees and vendors in a seeming exchange for state funding and other support. Wolf brings this

action to vindicate not only her own rights, but the rights of the Hospital's staff and patients as well as those of all Illinois residents to be free from political corruption.

### **Jurisdiction and Venue**

2. Wolf's claims arise under the Family Medical Leave Act ("FMLA"), 29 U.S.C. § 2601, *et seq.*; as well as the Illinois Whistleblower Protection Act ("Whistleblower Act"), 740 ILCS 174/1 *et seq.*; Illinois Human Rights Act ("IHRA"), 775 ILCS 5/1 *et seq.*; and common law. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1343.<sup>1</sup> This Court has supplemental jurisdiction over the state-law claims pursuant to 28 U.S.C. § 1367.

3. Venue is proper in the Northern District of Illinois pursuant to 28 U.S.C. § 1391(b). The Hospital is located in this District and maintains its hospital in this District, where the unlawful conduct alleged in this Complaint occurred in this District.

### **Parties**

4. Defendant SAH is an independent community hospital located on Chicago's southwest side. According to its most recently published Annual Report (2017), the Hospital employs over 1000 employees at its primary location as well as at five other satellite clinics and wellness centers.

5. Plaintiff Wolf resides in Oakbrook Terrace, Illinois. Wolf is a 66-year-old, Hispanic woman who worked for Defendant SAH from June 6, 2016,

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<sup>1</sup> Plaintiff cross filed her Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC"), No. 21BA 10769, which remains pending. Plaintiff intends to amend her Complaint to add claims under Title VII of the Civil Rights Act of 1964 ("Title VII"), 42 U.S.C. § 2000e, *et seq.*; the Age Discrimination in Employment Act ("ADEA"), 29 U.S.C. § 621 *et seq.*, the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 12112, after obtaining the Right to Sue from the EEOC.

until she was unlawfully terminated on June 18, 2020, as a part of a purported reduction in force (“RIF”).

### **Factual Allegations**

6. Wolf joined SAH as its CHRO on June 6, 2016, reporting directly to Medaglia, after the Hospital recruited her away from Exchange Services in Dallas, Texas, where she had served for five years as the Vice President, Human Resources. She brought with her three decades of experience as a human resource professional.

7. As her career progressed at SAH, Wolf began to observe Medaglia’s hostile behavior towards his female subordinates. Medaglia frequently subjected his female subordinates to explosive tirades and outbursts creating a work environment beset with fear and intimidation.

8. In addition, other female employees, especially those who worked closely with Medaglia, confided in Wolf about their experiences with his verbal abuse, requesting her confidentiality out of fear of losing their jobs.

### **Wolf Complains About the Hostile Work Environment For Women at SAH And Objects to Perceived or Actual Political Corruption**

9. Stunned by Medaglia’s hostility towards a female subordinate at an April 2019 executive committee meeting, Wolf called Medaglia to discuss his behavior. Wolf told Medaglia that his employees, in particular his female employees, were fearful of him as a result of his outburst. Medaglia cut Wolf off, making excuses for his behavior. Medaglia then told Wolf she was the “best HR person [he had] ever had,” and assured her he had a “great deal of respect for” her, and “didn’t want to lose her,” or words to that effect. Medaglia further told Wolf “not to take it

[his comments] from a sexual harassment perspective” but he found her “extremely attractive, smart, confident, and the kind of woman [he] would be interested in pursuing on a personal level,” or words to that effect. Shocked and extremely uncomfortable, Wolf attempted to ignore Medaglia’s comments.

10. Medaglia ended the call with a request for Wolf—he asked her to figure out how her “colleagues” could better prepare in order to avoid his wrath since he could not promise that his outburst would not happen again.

11. After their conversation regarding the April 2019 executive committee meeting incident, Medaglia and Wolf’s professional relationship deteriorated. Medaglia undermined, marginalized, and belittled Wolf. Medaglia often yelled at Wolf about business issues, blamed her for problems beyond her control, for example, the lack of state financial support, and began excluding her from HR-related decisions.

12. Nevertheless, Wolf continued to object to what she believed were Medaglia’s illegal actions. For example, Wolf opposed Medaglia’s June 2019 instruction to create two unnecessary positions for Senator Martin Sandoval’s two adult children and daughter’s boyfriend (Jennifer Sandoval, Martin Sandoval, Jr., (“Sandoval II”), and Matthew Castillo) in exchange for a \$5,500,000 state grant Sandoval secured for the Hospital. At the time, Sandoval was already under investigation for public corruption and has since pleaded guilty to federal charges before dying on December 5, 2020.

13. Faced with Wolf’s opposition, Medaglia circumvented her and ordered

a Director of HR to draft offer letters with salaries for Ms. Sandoval, Sandoval II, and Castillo, which were not consistent with their positions. SAH then employed all three.

14. SAH was awarded a second \$5,500,000 state grant that summer, which was paid out September 17, 2019.

15. Medaglia made frequent, publicly reported contributions to Sandoval family political campaigns.

16. Later that summer, Medaglia explained that then-Speaker of the Illinois House of Representatives Michael Madigan had requested that his son, Andrew Madigan, replace the Hospital's existing insurance broker. To that end, Medaglia instructed Wolf to share the Hospital's current rates with the younger Madigan so he could undercut them.

17. Wolf objected to the Madigan scheme, noting that their current broker had been providing exemplary service and significant savings. Despite Medaglia's insistence that in Chicago you "pay to play" and this was one of those times it was necessary to play, or words to that effect, Wolf insisted on securing three competitive bids. As a result of that process, Wolf recommended remaining with the Hospital's current broker.

18. Medaglia blamed Wolf for a lack of financial support from the State in a leadership meeting, noting that Senator Sandoval was by then under indictment for political corruption and Madigan was "not happy with us," or words to that effect.

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