

020

Further, it is uncontroverted that discussions of Columbians and drugs occurred within Defendant's laboratory. Mr. Ron Swaller testified that while those discussions may have occurred on a regular basis, it was merely only a reflection of the current news topics. Despite the testimony of Mr. Paul Humburg that the name Jesus Alberto Cabal appeared to him to be that of a typical white American male, it is incredulous for Defendant to assert that everyone within Defendant's lab was not aware that the Plaintiff was of Columbian origin. Yet, Defendant, even if it was only discussing current events, constantly and intentionally ignored Plaintiff's rights, and feelings, sterotyped individuals from Columbian origin, and asserted that those individuals were "drug dealers" and "pot dealers".

Further, Plaintiff testified that on numerous occasions Defendant's employees, including supervisory personnel, asserted that Columbians were "gay", "weirdos", and "homosexuals". These statements, in and of themselves, and certainly in conjunction with Defendant's other activities, discriminated against Plaintiff because of his national origin and caused Plaintiff great harm, suffering, and emotional distress. Ultimately, Plaintiff was caused to leave his job and suffer great harm while being unemployed and often starving for food.

Lastly, Plaintiff cites to this Court's jury instructions whereby the Court recognized the difficulty in proving