

Margaret Campbell,

Plaintiff,

**Findings of Fact, Conclusions of Law, and
Order for Judgment Following Jury Trial**

v.

Honor the Earth,

Court File No. 03-CV-19-266

Defendant.

On March 27-30, 2023, this matter came on for Jury Trial before the Honorable Gretchen D. Thilmony, Judge of District Court. Plaintiff, Margaret Campbell (“Campbell”), appeared with her attorney, Christy Hall. Attorney Frank Bibeau appeared on behalf of Defendant, Honor the Earth, with its Executive Director, Winona LaDuke.

The Court being duly advised after having considered all of the facts, testimony, exhibits, and proceedings herein, makes the following:

Findings of Fact

1. **Verdict for Count 1:** The Court adopts the findings as set forth in the Verdict Forms for “Verdict for Count 1” finding that the Defendant, Honor the Earth, is responsible for sexual harassment perpetrated by one of its employees against the Plaintiff, Margaret Campbell, in violation of the Minnesota Human Rights Act (MHRA), Minn. Stat. § 363A.08. The Court also adopts the Jury’s findings on the following damages awards:

- a. **Actual Damages:** The amount of actual damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$200,000.
- b. **Treble/Additional Damages:** The amount of treble damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$50,000.
- c. **Damages for Mental Anguish and Suffering** The amount of damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$100,000.

d. **Punitive Damages:** As to punitive damages, the Court adopts the Jury's finding that, *by clear and convincing evidence*, the Defendant, Honor the Earth, acted with deliberate disregard for the rights or safety of others. The amount of damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$25,000.

2. **Verdict for Count 2(A):** The Court adopts the findings as set forth in the Verdict Forms for "Verdict for Count 2(A)" finding that Defendant, Honor the Earth, retaliated against Plaintiff, Margaret Campbell, when it placed her on unpaid leave for opposing sexual harassment, in violation of the MHRA, Minn. Stat. § 363A.15. The Court also adopts the Jury's findings on the following damages awards:

a. **Actual Damages:** The amount of actual damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$100,000.

b. **Treble/Additional Damages:** The amount of treble damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$50,000.

c. **Damages for Mental Anguish and Suffering** The amount of damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$50,000.

d. **Punitive Damages:** As to punitive damages, the Court adopts the Jury's finding that, *by clear and convincing evidence*, the Defendant, Honor the Earth, acted with deliberate disregard for the rights or safety of others. The amount of damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$25,000.

3. **Verdict for Count 2(B):** The Court adopts the findings as set forth in the Verdict Forms for "Verdict for Count 2(B)" finding that Defendant, Honor the Earth, retaliated against Plaintiff, Margaret Campbell, when it caused her subsequent career harm for her opposition to sexual harassment. The Court also adopts the Jury's findings on the following damages awards:

a. **Actual Damages:** The amount of actual damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$50,000.

b. **Treble/Additional Damages:** The amount of treble damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$25,000.

c. **Damages for Mental Anguish and Suffering** The amount of damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$50,000.

d. **Punitive Damages:** As to punitive damages, the Court adopts the Jury's finding that, *by clear and convincing evidence*, the Defendant, Honor the Earth, acted with deliberate disregard for the rights or safety of others. The amount of damages that will fairly and adequately compensate Margaret Campbell for the harm caused to her is \$25,000.

Conclusions of Law and Order for Judgment

It is **ordered and adjudged** that Plaintiff, Margaret Campbell, is awarded \$750,000 from Defendant, Honor the Earth. The prevailing party on all respective claims is awarded costs and disbursements as allowed by law.

Let Judgment be entered accordingly.

Dated: April 4, 2023

BY THE COURT:

Gretchen D. Thilmony
Judge of District Court