

Investigation Insights

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Analysis and Commentary From NFC's Investigations Practice Group - May 2026

Case Spotlight:

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***Meadows v. Delta Air Lines, Inc.*, No. 25-1346,
2026 WL 242884 (6th Cir. Jan. 29, 2026)**

Jacqueline Meadows (Meadows), a flight attendant with Delta Air Lines, was the subject of a complaint from a crew member, Lynnette Marshall (Marshall), after a verbal dispute over whether Meadows violated Delta policy regarding staffing levels during disembarkation. Marshall claimed that Meadows threatened her by saying she would “take [Marshall] down” if she stepped closer and requested that a Field Service Manager (FSM) meet with the crew the same day. The FSM interviewed Marshall and Meadows and prepared summaries of those conversations. According to the FSM, Meadows acknowledged that she made the “take her down” comment.

Marshall also reported the dispute through Delta’s internal complaint process, asserting that Meadows’s alleged comment violated Delta’s Workplace Violence Policy. A different FSM continued the investigation, including taking a written statement from Meadows and speaking to other witnesses, who reported that Marshall had instigated the dispute and yelled at Meadows. The FSM recommended that Meadows and Marshall receive verbal coaching.

The final decision regarding Marshall’s complaint rested with Delta’s Workplace Violence Committee, which was shielded from knowing Meadows’s race. The Committee considered the full investigation record and concluded that Meadows made the comment, in violation of Delta’s policy. The Committee determined that Meadows should receive a final warning and that Marshall should receive a lesser form of discipline for her role in the dispute.

When Meadows was informed of the outcome, she complained that the investigation and discipline constituted “racism, bullying, and sexism.” A director and an HR manager met with Meadows, who told them she had not made the “take her down” comment (or acknowledged making it to the FSM). The director and manager contacted the FSM, who reiterated that Meadows confirmed to him that she made the comment. The director and manager concluded there was no basis to change the Committee’s determination.



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Nearly two years later, Meadows sued, alleging that Delta discriminated against her by issuing the final warning and by failing to follow up on her complaint that the investigation was biased. The District Court granted summary judgment to Delta.

The Sixth Circuit affirmed. Regarding the final warning, the Court found there was no genuine dispute over whether Delta's proffered reason for issuing the warning—the "take her down" comment—had a basis in fact.

Citing the evidence from the investigation, the Court explained that even if Meadows disputed

making the comment, there could be no dispute that she was disciplined because of the Committee's "honest belief" that she did so.

The Court also noted that the Committee did not know Meadows's race. Finally, the Court rejected Meadows's claim that Delta failed to follow up on her complaint about the investigation, citing the fact that the director and HR manager spoke with her and the FSM whose report she disputed before confirming the Committee's decision.



Key Takeaways:

- The resolution of a workplace misconduct investigation can give rise to new, unintended claims (e.g., discrimination).
- Employers can reduce this risk by predicating decisions on solid factual findings from an investigation.
- Employers can further reduce this risk by, if practical, insulating the decisionmaker from unrelated information, like protected characteristics.
- If a participant claims that bias played a role in the outcome of the investigation, this claim should be evaluated, potentially investigated, and documented with the appropriate resolution.

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