

DECLARATION OF [REDACTED] PURSUANT TO 28 U.S.C. § 1746 UNDER THE PENALTY OF PERJURY

1. I am [REDACTED] I am over the age of 18 and make this Declaration based on personal knowledge.
2. I worked with Doretha Steeples at BAE from May 2018 to about December 2018. I have worked at BAE from 2013 to present.
3. In the winter of 2017, co-worker Tracy called me the “N” word at least three times. She said “I understand why you act like a n[REDACTED]er”. I told her after each incident I did not appreciate her using that language and speaking to me this way. I also made a written complaint to Amanda in HR, Amanda said she'd investigate. I never heard back from Amanda and Tracy continues working there.
4. In February/March 2018, during a conversation with co-worker [REDACTED] and Tracy, Tracy again used the “N” word describing an argument she had with her husband. Mr. [REDACTED] asked her not to use such offensive language, Tracy repeated the story two more times to us. I went to HR that same day again reporting her deeply offensive racial slurs. Again, nothing happened to address the issue.
5. Late June 2019 Tracy was talking to a Caucasian male co-worker and said “they are definitely hiring too many n[REDACTED]ers in the Shop”. I didn't bother to complain because I knew HR/management would do nothing.
6. I have made several written and verbal complaints to HR/management since 2017 about Tracy's continued use of racially motivated comments and slurs. BAE has done nothing to address this ongoing problem.
7. I declare under penalty of perjury that the foregoing is true and correct.

Pavlov J. [REDACTED] =

[REDACTED]

8-17-19

Date

DECLARATION OF Christopher [REDACTED] PURSUANT TO 28 U.S.C. § 1746 UNDER THE
PENALTY OF PERJURY

1. I am [REDACTED] I am over the age of 18 and make this Declaration based on personal knowledge.
2. I have worked with Doretha Steeples at the BAE from May 2018 to December 2018. I have worked there from January 2018 to presesnt.
3. In February/March 2018 I heard co-worker Tracy use the "N" word three times during one incident/interaction between myself, co-worker [REDACTED] and Tracy. This occurred at 7:15 am during breakfast where she told us that during an argument with her husband she called him a "ni [REDACTED] r". She repeated the story a second and third time again using the "N" word. I asked her to "stop using that word". When she said she didn't mean it "that way", I took her aside and told her "black people find the "N" word very offensive regardless of how it's used. There are consequences to your words, you should choose them carefully and wisely". Tracy responded by telling me it was her right to use the "N" word due to freedom of speech.
4. The same day, I was called down to HR as a witness after [REDACTED] complained to HR about Tracy using the "N" word repeatedly that morning. I reported to HR word for word Tracy's comments, as well as my asking her to stop using this offensive language. To my knowledge, she was not disciplined for using this racist and offensive language.
5. I declare under penalty of perjury that the foregoing is true and correct.



8/19/19

Date

[Quoted text hidden]

DECLARATION OF Mr. [REDACTED] PURSUANT TO 28 U.S.C. § 1746 UNDER THE PENALTY
OF PERJURY

1. My name is [REDACTED] I am over the age of 18 and make this Declaration based on personal knowledge.
2. I worked with Doretha Steeples at the BAE Shipyard from May 2018 to about November/December 2018. I have worked at BAE off and on from 2001 to the present.
3. I heard co-worker Tracy use the "N" word to Ms. Steeples to her face on one occasion. I heard Tracy use the "N" word about Ms. Steeples and other African American male co-workers behind their backs on several occasions. During a conversation with Ms. Steeples, myself, co-worker [REDACTED] (Firewatch Supervisor), and Tracy, Tracy said "these fucking niggers get on my effin nerves". This occurred around June/July 2018.
4. I worked alongside Tracy at BAE for fifteen months and I heard her use this offensive racist language on several occasions, even after I said to her directly "watch your mouth, I don't like to hear you talk like that". She laughed it off, and said it was her First Amendment right to talk like that.
5. Ms. Steeples told me she made complaints to management and HR about Tracy's ongoing racist attacks against her. I continued to hear Tracy use the "N" word after Ms. Steeples reported this to management and HR.
6. I declare under penalty of perjury that the foregoing is true and correct.


[REDACTED]

9-3-19

Date

DECLARATION OF [REDACTED] PURSUANT TO 28 U.S.C. § 1746 UNDER THE
PENALTY OF PERJURY

1. My name is [REDACTED] I am over the age of 18 and make this Declaration based on personal knowledge.
2. I worked with Doretha Steeples at BAE during her employment from May 2018 to about December 2018. I worked there from January 2018 to June 2019.
3. At work in the Pipe Shop, I heard co-worker Tracy use the "N" word and other racially charged language about African American female and male co-workers. Ms. Steeples told me directly that Tracy used the "N" word toward her several times, and that she was extremely upset and stressed out by this.
4. Ms. Steeples told me she asked Tracy several times not to speak to her this way. When it didn't stop, she reported Tracy's continued racial harassment to our supervisor Tony Featherstone. Ms. Steeples told me she asked him to separate her from Tracy, because working with Tracy was causing her so much stress. Mr. Featherstone ignored her request initially.
5. I heard Tracy use the N word about a female co-worker named K [REDACTED] about a male co-worker named Mr. C [REDACTED] as well as about S [REDACTED]
6. Management was not at all sympathetic to Ms. Steeples ongoing complaints about Tracy's continued use of racial slurs/language and harassment. To my knowledge, Tracy never changed and continued to use racially charged language well after management was aware this was going on.
7. I declare under penalty of perjury that the foregoing is true and correct.

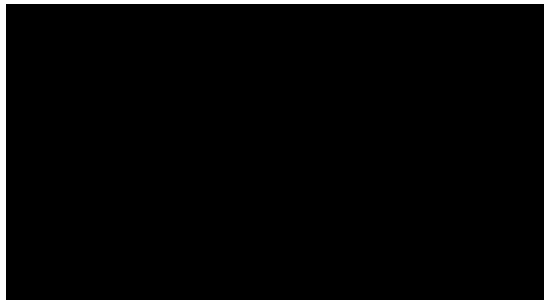
W. [REDACTED] 8-16-19

[REDACTED]
Date



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This document was signed by:



Date

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IP Address

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Confirmation

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DECLARATION OF [REDACTED] PURSUANT TO 28 U.S.C. § 1746 UNDER THE
PENALTY OF PERJURY

1. I a [REDACTED] I am over the age of 18 and make this Declaration based on personal knowledge and in addition to the Declaration I made on August 17, 2019.
2. I noticed in the last couple weeks that Tracy Coleman¹ is working again at the Pipe Shop, on night shift. I try to avoid her, given the past encounters I have experienced with her, when she called me the “N” word repeatedly.
3. However, a few days ago, on or around July 5, 2020, as I was clocking out, Tracy was clocking in. I said goodbye to some of my co-workers, but did not say anything to her. She then said to me that I was “rude as shit.” I ignored her, but as I was leaving about two minutes later, she said something to the effect of, “You don’t have to be in here being rude like that.” I responded, “I’m not being rude. Ain’t nothing for me to say to you and nothing for you to say to me.”
4. The next morning, I was called into Human Resources. Amanda from HR was there, as well as our union representative, Mike. Amanda stated that Tracy had complained that I was causing a hostile environment for her. Amanda asked me what happened with Tracy the day before. I told Amanda about the brief, unprompted exchange that I had with Tracy, in which she called me “rude as shit.”
5. The union representative Mike then said to Amanda something to the effect of, “Tracy has a dirty mouth. I have personally heard her say, ‘I hate working with all these n*****s.’” He added, “She is a white woman working at a shipyard. She gets away with anything.”
6. I did not have any personal conversations with the union representative concerning Tracy outside of my meeting with Human Resources.

¹ I am unclear as to the spelling of her last name.

7. I feel like I am being treated unfairly because of Tracy's repeated, racially harassing behavior. I do not feel like I needed to be called into Human Resources based on Tracy's false accusation that I caused a hostile work environment.
8. There is supposed to be zero tolerance of racial harassment at BAE. But the fact that Tracy has repeatedly used the "N" word directed at me and others in the past and is still allowed to come into work and harass me, accusing *me* of causing a hostile work environment, makes me feel like the policy does not work and is being used against me.
9. If BAE's zero tolerance policy means anything, Tracy should not be at the shipyard.
10. I declare under penalty of perjury that the foregoing is true and correct.

P.

7/13/2020

Date