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UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

<b>OFFICE OF FEDERAL CONTRACT</b>	)	Case No.: 2017-OFC-00006
<b>COMPLIANCE PROGRAMS, UNITED</b>	)	
<b>STATES DEPARTMENT OF LABOR</b>	)	<b>DECLARATION OF KIRSTEN S.</b>
	)	<b>HANSON GARCIA</b>
Plaintiff,	)	
v.	)	
	)	
<b>ORACLE AMERICA, INC.</b>	)	
	)	
Defendant.	)	
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I, Kirsten S. Hanson Garcia, state and declare as follows.

1. I am providing this declaration pursuant to a request from the Department of Labor Office of the Solicitor.

2. I worked for Oracle America, Inc. for approximately 16 years. I began working for Oracle around 1998. I left Oracle around summer 2014. Sometime around the mid-2000s I transitioned into the human resources organization. I have personal knowledge of the matters stated herein and, if necessary, I could and would testify to the facts stated below.

3. I have a Doctorate of Education. I currently teach at the University of San Diego in the School of Business Administration. I also periodically teach at the University of San Diego Institute for Peace and Justice. I also have a Master's Degree in Learning Sciences from Northwestern University.

4. Around the summer of 2014, I left my employment with Oracle to pursue other opportunities. At that time, I held the position of Senior Director of Global Organization and Talent Development. This function was often referred to as OTD. I held this position from approximately the mid-2000s to 2014. At the time I left Oracle, I reported to Anje Dodson, who was a Human Resources Vice President. Anje Dodson reported to Joyce Westerdahl, who around that time held the position of Senior Vice President, in charge of Oracle's Human Resources globally.

5. Generally speaking in my capacity as Senior Director of Organization and Talent Development, I was responsible for creating leadership training and professional development training, advising executive leaders and managers when they wanted to develop their teams, overseeing and facilitating talent review processes, leading Oracle Women's

1 Leadership initiative, and special projects. My responsibilities covered all Oracle offices,  
2 including the Redwood Shores facility.

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4 6. In my capacity as Senior Director of Organization and Talent Development, I  
5 managed a team of approximately 70 employees. My responsibilities as a manager required  
6 that I use the Compensation Workbench tool. The Compensation Workbench tool only gave  
7 me a narrow window into Oracle's salary budget and the current salaries of my employees.  
8 For example, during a focal review, I could only view the narrow portion of the salary budget  
9 to be allocated to my reports and anyone underneath them. So, for example, I could not see  
10 the overall budget for salary increases at Oracle's headquarters, the budget for salary  
11 increases for all the managers and employees in the HR job function, the budgeted amounts  
12 for my peers under Anje Dodson, or the amounts budgeted for salary increases to the reports  
13 of managers outside the HR job functions. This tool did not allow me to see the pay of my  
14 counterparts' employees in similar positions. I did not know if my employees received the  
15 same salary amounts as other employees in similar functions on other teams and other  
16 geographies. The Compensation Workbench tool did not disclose the race of an employee. I  
17 am not aware of having access to another tool that would provide me with the race of an  
18 employee who reported to me.

19 7. I recall attending a Human Resources meeting in an office at Redwood  
20 Shores. At the meeting, Joyce Westerdahl, who was Oracle's head of Human Resources  
21 globally, advised a high-level executive that he should hire a woman because she will work  
22 harder for less money. I remember this comment because I was shocked to hear Oracle's  
23 head of Human Resources give such advice at a high-level meeting.

24  
25 8. On more than one occasion, in the early 2000s, I heard members of Oracle's  
26 Human Resources Organization comment that you could hire four Indians for the price of  
27 one. I assumed that this referred to hiring Indian employees in India.

1 you could hire four Indians for the price of one. I assumed that this referred to hiring Indian  
2 employees in India.

3  
4 9. While I worked at Oracle, I did not receive training or guidance as to how to  
5 ensure that men and women were paid equitably; or any training or guidance as to how to  
6 ensure that minorities and whites were paid equitably. I was not aware that Oracle had an  
7 Affirmative Action Plan. I was not aware of a budget or fund dedicated to ensuring pay  
8 equity or correcting pay disparities based on race or gender.

9 I declare under penalty of perjury under the laws of the United States that the  
10 foregoing is true and correct.

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12 Executed on September 20, 2019 in San Diego, California

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Kirsten S. Hanson Garcia

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