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13 UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

14 **OFFICE OF FEDERAL CONTRACT**) Case No.: 2017-OFC-00006
15 **COMPLIANCE PROGRAMS, UNITED**)
16 **STATES DEPARTMENT OF LABOR**) **DECLARATION OF CHRISTINA J.**
17) **KOLOTOUROS**

17 Plaintiff,
18 V.)
19)

19 **ORACLE AMERICA, INC.**)
20)

20 Defendant.)
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I, Christina J. Kolotouros, 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. at the Redwood Shores facility from approximately 1994 to 2018. I have personal knowledge of the matters stated herein and, if necessary, I could and would testify to the facts stated below.

3. At the time of my separation from employment with Oracle, I held the position of Senior Director of Customer Experience User Experience, which was sometimes referred to as CX UX. I held this position for at least three years. My “level” was M5. When I moved to this position, I reported to Killian Evers, who at that time held the position of Senior Director of Oracle Applications User Experience, which was sometimes referred to as OAUX.

4. Prior to becoming a Senior Director, I held multiple directing positions, including: Business Intelligence Product Management Director from approximately 2005 to 2008; E2.0 Product Management and Curriculum Director from approximately 2008 to 2011; and Oracle WebCenter Product Management Director from approximately 2011 to 2016. Prior to holding a director position, I held the Senior Manager Business Intelligence Product Management, which was an M3 position. I held a lower-level manager position prior to becoming a Senior Manager.

5. In my capacity as Senior Director of Customer Experience User Experience, I managed a team of approximately 7 to 9 employees. I had almost 40 employees reporting to me while I was the Business Intelligence Product Management Director. My responsibilities as a manager required that I be familiar with and use the cost centers designated for members of my team. In my final role at Oracle, even though I had only one team of employees

1 reporting to me, some of those employees worked on deliverables for more than one product.
2 For example, designers in CX UX worked sometimes worked on multiple products at a time,
3 and sometimes worked on different products from each other. When I assigned work to my
4 employees it was generally based on an employee's availability and his or her experience.

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6 6. When I took over the CX UX team they had different cost centers. I do not
7 recall the date, but at some point, I was instructed to bring my team under the same cost
8 center. I believe that cost center was CW17. I did not choose this cost center, I believe
9 Finance choose the cost center number I was supposed to use. It was my understanding that
10 the team of employees that I inherited had different cost centers because of "legacy data,"
11 that is to say their cost centers were not updated after a reorganization or a transfer. This
12 was not the first time I had a team of employees who had different cost centers. It had
13 happened in the past as well.

14 7. In my experience, the cost center associated with an employee did not relate to
15 an employee's skills, abilities, or experience. An employee's skills, abilities, or experience
16 was supposed to be represented by job code. In my experience, the cost center in which an
17 employee was located was not a factor in determining an employee's compensation, such as
18 the employee's salary range, bonus grants, or stock options and RSU awards. In my
19 experience, cost centers were used for tracking expenses such as travel and entertainment,
20 and expenses do not determine how much an employee is paid. It was my understanding
21 that the salary band for employees was based on job code and geography.

22 8. In my capacity as a Director and Senior Director, I was required to be familiar
23 with the Workbench Compensation tool. This tool allowed me to view the pay of my
24 employees. However, this tool did not allow me to see the pay of my counterparts'
25 employees in similarly leveled positions. I did not know if my employees received the same
26 salary amounts as other similarly leveled employees on other teams. This tool did not
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1 disclose the race of an employee. I did not have access to another tool that would provide me
2 with the race of an employees who reported to me. This tool only gave me access to the
3 salary band information of the employees already on my team, which made determining the
4 proposed salary of new hires and promotions difficult. I would only know this information if
5 I had someone on my team with the same jobcode and in the same geographic area.

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7 9. At no point was I ever informed by Oracle that the product an employee
8 worked on determines an employee's compensation. An employee can work on multiple
9 products throughout their career, but that would not determine their compensation.
10 Employees can work on different products due to market changes, internal transfers, or
11 reorganizations. If an employee transferred teams to work on a different product his or her
12 salary would not be changed.

13 10. While I worked at Oracle, I did not receive training or guidance as to how to
14 ensure that men and women were paid equitably; I was not given any training or guidance as
15 to how to ensure that minorities and whites are paid equitably.

16 11. I declare under penalty of perjury under the laws of the United States that
17 the foregoing is true and correct.

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19 Executed on September 19, 2019, in Woodside, California,

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22 Christina J. Kolotouros
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