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DEC 14 2017



CIVIL RIGHTS DIVISION  
PORTLAND OFFICE

**BUREAU OF LABOR AND INDUSTRIES**

Civil Rights Division Complaint of Unlawful Practice

COMPLAINANT:

PATRICIA MARTINEZ



Case #:

EEEMRC171214-71653

RESPONDENT:

G4S SECURE SOLUTIONS (USA) INC.  
DBA G4S USA  
DBA G4S SOLUTIONS  
800 CONNECT WAY  
PRINEVILLE, OR 97754

Contact:  
Human Resources

**Headquarters:**

G4S SECURE SOLUTIONS (USA) INC.  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

G4S USA  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

G4S SOLUTIONS  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

County: CROOK

Employees: 50+

ORS 659A.030 (1) (b)

I, Patricia Martinez, under penalty of perjury, do depose and say as follows:

Allegations: I allege unlawful employment practices based on my race and national origin in that Respondent subjected me to different terms and conditions and reduced my hours.

1. I became employed by Respondent on February 1, 2017 in security.
2. I am Hispanic American.
3. In 2017, supervisor Thomas Brieter hired new Caucasian employees.
4. On September 1, 2017, Mr. Brieter reduced my hours from full-time to part-time and changed my shift. Only employees with Hispanic last names were affected by these changes.

I believe Respondent subjected me to different terms and conditions and reduced my hours based on my race and national origin.

MM/17-06091\ 11.16.2017 / Revised: 12/5/17-MM

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**PORTLAND**

800 NE Oregon St., Suite 1045  
Portland, Oregon 97232-2180

**SALEM**

3865 Wolverine Ave. NE; E-1  
Salem, Oregon 97305-1268

**EUGENE**

1400 Executive Parkway, Suite 200  
Eugene, Oregon 97401-2158

I hereby declare under penalty of perjury that the above statement is true and correct to the best of my knowledge and belief, and that I understand it is made for use as evidence in an official proceeding.

I understand that the above statement is a public record and that the information herein may be disclosed to any person, at any time.

Your signature: *Patricia S. Marty*

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JAN 5 2018

BUREAU OF LABOR AND INDUSTRIES

Civil Rights Division Complaint of Unlawful Practice



CIVIL RIGHTS DIVISION  
PORTLAND OFFICE

COMPLAINANT:

RICKY HERNANDEZ

Case #:

EEEMRC180105-70025

RESPONDENT:

G4S SECURE SOLUTIONS (USA) INC.  
DBA G4S USA  
DBA G4S SOLUTIONS  
800 CONNECT WAY  
PRINEVILLE, OR 97754

Contact:  
Human Resources

HEADQUARTERS:

G4S SECURE SOLUTIONS (USA) INC.  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

G4S USA  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

G4S SOLUTIONS  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

County: CROOK

Employees: 50+

ORS 659A.030 (1) (b) (f)

I, Ricky Hernandez, under penalty of perjury, do depose and say as follows:

Allegations: I allege unlawful employment practices based on my race, national origin and reporting race discrimination in that Respondent subjected me to different terms and conditions and changed my schedule.

1. I became employed by Respondent in July 2016 as a security officer.
2. I am Hispanic American.
3. In 2017, area manager Thomas Brieter hired new Caucasian employees.
4. On or around August 15, 2017, my co-worker Scott Ferrell referred to all Hispanic workers as the "Mexican mafia."
5. On August 30, 2017, I reported Mr. Ferrell's derogatory statement to Mr. Brieter. Soon after, Respondent told me that I was no longer able to have a day shift.

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Eugene, Oregon 97401-2158

6. On August 30, 2017, I sent a complaint letter to Human Resources explaining Mr. Ferrell's derogatory statement and schedule changes. No one from human resources contacted me.
7. On September 1, 2017, I started working on a graveyard shift. I found out that only employees with Hispanic last names were affected by the schedule changes.
8. On September 29, 2017, I complained about the different treatment to Mr. Brieter. Respondent has not addressed my concerns.

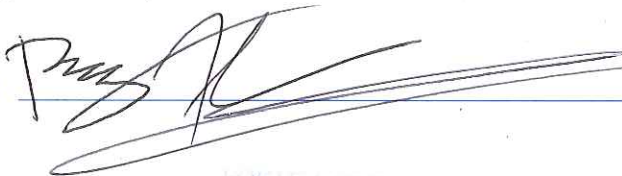
I believe Respondent subjected me to different terms and conditions and changed my schedule based on my race, national origin and for reporting race discrimination.

MM/17-06113\11.20.2017  
Revised: 12/5/17-MM

I hereby declare under penalty of perjury that the above statement is true and correct to the best of my knowledge and belief, and that I understand it is made for use as evidence in an official proceeding.

I understand that the above statement is a public record and that the information herein may be disclosed to any person, at any time.

Your signature:



A handwritten signature in blue ink, appearing to be 'D. M. S.', is written over a horizontal line. The signature is stylized and somewhat illegible.

WORKERS' COMPENSATION  
CLAIMS DIVISION

NOV 15 2017

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JAN 22 2018

CIVIL RIGHTS DIVISION  
PORTLAND OFFICE

## BUREAU OF LABOR AND INDUSTRIES

Civil Rights Division Complaint of Unlawful Practice

## COMPLAINANT:

NANCY GONZALEZ ORTIZ  
[REDACTED]

## Case #:

EEEMRC180122-70134

## RESPONDENT:

G4S Secure Solutions (USA) Inc. — Contact: Human Resources  
*dba* G4S  
 500 SW Connect Way  
 Prineville, OR 97754

## Headquarters:

G4S Secure Solutions (USA) Inc.  
 1395 University Drive  
 Jupiter, FL 33458

G4S Secure Solutions (USA) Inc.  
 4304 W 24<sup>th</sup> Avenue  
 Kennewick, WA 99338

County: Crook

# of Employees: 50+

ORS 659A.030 (1) (b) (f)

I, Nancy Gonzalez Ortiz, under penalty of perjury, do depose and say as follows:

Allegations: I allege unlawful employment practices based on my race and sex in that Respondent subjects me to a hostile work environment, and based on my opposition to unlawful employment practices, in that Respondent retaliated against me by demoting me.

1. I was hired by Respondent on or around February 1, 2017, my current position is SOC operator.
2. I am a Hispanic woman.
3. Beginning in or around late June 2017 through September 2017, I was subjected to racial comments by co-worker Scott Ferrell. Mr. Ferrell referred to me and other Hispanic co-workers as "The Mexicans," "The fucking Mexicans" and "The Mexican mafia."
4. Beginning in or around July 2017 through September 2017, co-workers Danny Hopper and David Pitts reported to operations manager Thomas Breiter that we, the Hispanic employees were being subjected to discriminatory treatment and a hostile work environment. Mr. Breiter ignored the reports and the matter was escalated to human resources.
5. In or around late August 2017, I was informed by Mr. Breiter that I needed to move to graveyard shift to maintain my supervisory position due to the fact that I was supervising family members during the day shift. There were several other supervisors that also worked day shift and were

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## EUGENE

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 Eugene, Oregon 97401-2158

available to handle any concerns with employees that were related to me and could be a conflict of interest.

6. I believe this schedule change was based on pretext, and was in retaliation for my reports of discrimination.
7. In or around late August 2017, I was demoted from my supervisory position and given a position as an SOC operator with less pay. When I questioned Mr. Breiter about the terms of my demotion he it was based on Respondent's nepotism policy and threatened me with termination.
8. After my demotion, I was replaced by a non-Hispanic male employee. Mr. Breiter has a pattern of only placing non-Hispanic male employees in supervisory positions.
9. To date, I have inquired multiple times about the reason for my demotion, but no one in human resources or management has been willing to give me a reason other than nepotism, which I deny.

I believe that Respondent is discriminating against me based on my race, sex and opposition to unlawful practices, in that Respondent subjects me to a hostile work environment, and retaliated against me by demoting me.

sr\17-04954\ 10.26.2017\Revised 1.3.2018

I hereby declare under penalty of perjury that the above statement is true and correct to the best of my knowledge and belief, and that I understand it is made for use as evidence in an official proceeding.

I understand that the above statement is a public record and that the information herein may be disclosed to any person, at any time.

Your signature:

A handwritten signature in blue ink, appearing to read "Ahmed Amzels Odeh", is written over a horizontal line.

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JAN 29 2018

BUREAU OF LABOR AND INDUSTRIES

Civil Rights Division Complaint of Unlawful Practice

CIVIL RIGHTS DIVISION  
PORTLAND OFFICE



COMPLAINANT:

LIZBETH ORTIZ

Case #:

EEEMRC180129-70178

RESPONDENT:

G4S SECURE SOLUTIONS (USA) INC.  
DBA G4S USA  
DBA G4S SOLUTIONS  
800 CONNECT WAY  
PRINEVILLE, OR 97754

Contact:  
Human Resources

Headquarters:

G4S SECURE SOLUTIONS (USA) INC.  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

G4S USA  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

G4S SOLUTIONS  
1395 UNIVERSITY BOULEVARD  
JUPITER, FL 33458

County: CROOK

Employees: 50+

ORS 659A.030 (1) (b) (f)

I, Lizbeth Ortiz, under penalty of perjury, do depose and say as follows:

Allegations: I allege unlawful employment practices based on my race, national origin and reporting race discrimination in that Respondent subjected me to different terms and conditions and retaliated against me.

1. I became employed by Respondent in February 2017 as a security officer.
2. I am Hispanic American.
3. On or around August 15, 2017, my co-worker Scott Ferrell referred to all Hispanic workers as the "Mexican mafia."
4. On or around August 30, 2017, I talked with site manager Thomas Brieter about Mr. Ferrell's racial statement.
5. On or around August 30, 2017, Mr. Brieter removed me from security duties and placed me to work at the office. My security hours were given to Caucasian employees.

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1400 Executive Parkway, Suite 200  
Eugene, Oregon 97401-2158

6. In or around September 2017, I complained about the differential treatment to administrator Jared Kiso. I explained that I had not applied for a job in the office. Respondent took no corrective action and told me that I have to do whatever I was told to do.
7. As of November 27, 2017, Respondent has me working in the office.

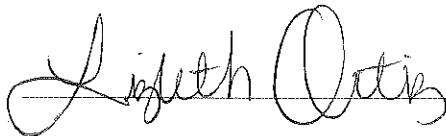
I believe Respondent subjected me to different terms and conditions and retaliated against me based on my race, national origin and for reporting race discrimination.

MM/17-06179\11.27.2017  
Revised: 1/23/18 - MM

I hereby declare under penalty of perjury that the above statement is true and correct to the best of my knowledge and belief, and that I understand it is made for use as evidence in an official proceeding.

I understand that the above statement is a public record and that the information herein may be disclosed to any person, at any time.

Your signature:

A handwritten signature in black ink, appearing to read "Lizabeth Ortiz", written over a horizontal line.



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MAR 06 2018

BUREAU OF LABOR AND INDUSTRIES

Civil Rights Division Complaint of Unlawful Practice



CIVIL RIGHTS DIVISION  
PORTLAND OFFICE

COMPLAINANT:

MARIA ORTIZ

Case #:

EEEMRC180306-70344

Attorney:

RESPONDENT:

G4S Secure Solutions  
500 SW Connect Way  
Prineville OR 97754

Contact: Human Resources

Headquarters:

1395 University Blvd.  
Jupiter, FL 33458

President:

John Kenning  
1395 University Blvd.  
Jupiter, FL 33458

County: Crook

# of Employees: 50,000+

ORS 659A.030 1(b)(f)

I, Maria Ortiz, under penalty of perjury, do depose and say as follows:

Allegations: I allege discrimination on the basis of race my reporting race discrimination in that Respondent failed to take corrective action, and subjected me to different terms and conditions of employment.

1. I was hired by Respondent in February 2017, as a security officer and receptionist.
2. I am Mexican/Hispanic.
3. Beginning in August and continuing until the end of September 2017, I was continually harassed by Officer Scott Farrell. He would refer to myself and coworkers as "those Mexicans" and "the Mexican Mafia". Officer Farrell would harass me on average 2 or 3 times a week.
4. Beginning in August and continuing until the end of September 2017, Officer Farrell would attempt to intimidate me by following me, and standing close to me when I was clocking in for my shift.
5. I reported the harassment to my Supervisor Danny Hopper, who reported it to my Manager Thomas ~~Rider~~, however during the time period the harassment continued.
6. I wrote three letters to human resources reporting the harassment, however I never heard back from human resources.

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7. I have knowledge that White employees are treated better than Hispanic employees, and are given the favorable shifts and hours.

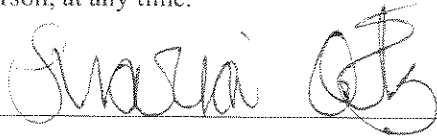
I believe that Respondent discriminated against me on the basis of my race, when Respondent subjected me to different terms and conditions of employment, and failed to take corrective action.

BB/17-06380\ 11.28.2017

I hereby declare under penalty of perjury that the above statement is true and correct to the best of my knowledge and belief, and that I understand it is made for use as evidence in an official proceeding.

I understand that the above statement is a public record and that the information herein may be disclosed to any person, at any time.

Your signature: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "Shasun", is written over a horizontal line. The signature is cursive and includes a large, stylized initial or flourish at the end.