

# WASHINGTON STATE HUMAN RIGHTS COMMISSION COMPLAINT

**Complainant:** Johnson, John

**Respondent:** Space Exploration Technologies Corp.  
1 Rocket Road  
Hawthorne, CA 90250

I charge the above-named Respondent with an unfair practice and/or aiding and abetting in the commission of an unfair practice as defined by the Washington State Law Against Discrimination Chapter 49.60 RCW. This complaint arises from discrimination in employment based on age and retaliation.

## **The following is a summary of my complaint:**

1. I am 62 years of age, and I opposed an unfair practice under RCW 49.60. Respondent has more than 15 employees. Respondent hired me as a Principal Manufacturing Engineer on August 13, 2018; in November 2021, my position was renamed Principal Materials Engineer.
2. During my tenure at Respondent, I was the premier authority on optics manufacturing at the company; however, starting from the time I was scheduled for back surgery due to a work-related injury in early 2020, Respondent progressively stripped my position of responsibilities, handing them over to younger, less qualified engineers, many of whom I was responsible to train. Despite efforts, supported by my direct supervisor, to recoup my former responsibilities or to carve out a similar role commensurate with my experience, knowledge and skill, Respondent managers continued to marginalize me, minimizing my contributions, limiting my visibility to upper management, and thereby curtailing my opportunities for professional recognition and advancement. Although I consistently received strong work-performance reviews and earned a stock award, a merit raise, and a long-term stock grant incentive, I was never offered a promotion, even though I had responded affirmatively when asked early on if I aspired to be a “people manager.” In the meantime, during my four-year tenure, Lead Engineers, an entry-level position, had ascended to Director positions.
3. In January 2022, I filed complaints reporting the ongoing age discrimination I was experiencing to Respondent President and HR. In a meeting, held on February 10, 2022, with Respondent HR about my complaint, Respondent gave me the choice of either leaving the company or assuming responsibilities outside of my area of expertise.
4. On two occasions at the end of May 2022, Respondent Supplier Development Engineer, who is decades young than I am, publicly questioned my technical knowledge and professional judgment in a meeting with suppliers who were attempting to renege on one of the terms of their contract. In a meeting held on May 31, 2022, Respondent Director, one of the people about whom I had complained to Respondent HR and President and who is also much younger than I am, publicly asserted, without citing any evidence in support of his stance, that he lacked confidence in my ability to deliver.
5. In the face of ongoing age discrimination, harassment, and a climate of hostility that Respondent HR failed to satisfactorily address, I felt I had no choice but to resign.

6. Therefore, I believe that Respondent discriminated against me based on age when it permanently reassigned my responsibilities to younger colleagues and blocked all pathways to professional advancement, avenues that were readily available to younger employees who were much less qualified and experienced. Further, I believe that Respondent Director retaliated against me for reporting his age-related discriminatory acts against me and that Respondent tolerated a hostile, discriminatory work environment that compelled me to undergo a constructive discharge.

**I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.**



Complainant's Signature

8/17/2022

Date

**I also allege violation of Title VII of the Civil Rights Act of 1964 and the Age Discrimination in Employment Act, and request that this complaint be dually filed with the U.S. Equal Employment Opportunity Commission.**

**This Box for Commission Use Only**

<b>HRC Case # :</b> _____
<b>EEOC Case #:</b> _____
<b>Date Filed:</b> _____ <b>Received by:</b> _____