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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOANNE STOCKWELL, an individual,

Plaintiff,

v.

AMAZON WEB SERVICES, INC., a
Delaware corporation; and **DOES 1 through
10**, inclusive,

Defendants.

CASE NO.:

COMPLAINT FOR DAMAGES:

- 1. Age Discrimination (Cal. Gov't. Code § 12940);**
- 2. Gender Discrimination (Cal. Gov't. Code § 12940);**
- 3. Retaliation (Cal. Gov't. Code § 12940(h));**
- 4. Retaliation (Cal. Lab. Code § 1102.5(b)); and**
- 5. Wrongful Termination in Violation Public Policy.**

DEMAND FOR JURY TRIAL

INTRODUCTION

Plaintiff Joanne Stockwell (herein "Plaintiff") brings this action against Amazon Web Services, Inc. (herein "Defendant") and DOES 1 through 10 (collectively "Defendants") for: 1) age discrimination; 2) gender discrimination; 3) retaliation pursuant to Cal. Gov't Code §

1 12940(h); 4) retaliation pursuant to Cal. Lab. Code § 1102.5; and 5) wrongful termination in
2 violation of public policy.

3 **JURISDICTION AND VENUE**

4 1. The amount in controversy in this action exceeds \$75,000 and the parties involved
5 are from different states, therefore, this Court has jurisdiction over this action pursuant to 28 U.S.C.
6 § 1332.

7 2. Venue is proper in the Northern District of California pursuant to 28 U.S.C. §
8 1391(b), because the events giving rise to Plaintiff's claims occurred in this District.

9 3. Pursuant to Northern District Local Rule 3-2 (c) & (d), this action should be
10 assigned to San Francisco or Oakland, as the actions giving rise to Plaintiff's claims took place in
11 the County of Contra Costa.

12 4. On March 14, 2025, Plaintiff properly notified the California Civil Rights
13 Department ("CRD") of her intent to sue Defendants and has received a "right-to-sue" notice prior
14 to filing this Complaint. A true and correct copy of Plaintiff's "right-to-sue" notice is attached
15 hereto as Exhibit A.

16 **NATURE OF THIS ACTION**

17 5. This is an action for relief from Defendant's violation of the California
18 Employment and Housing Act (herein "FEHA"), and the California Labor Code.

19 6. Defendant discriminated against Plaintiff during her employment by failing to
20 fulfill its obligations under the FEHA and the California Labor Code.

21 7. Plaintiff now seeks compensatory, general, and punitive damages, reasonable
22 attorneys' fees, and costs, as well as other appropriate relief as determined by this Court for
23 Defendant's violations of Plaintiff's rights.

24 Plaintiff hereby alleges as follows:

25 **THE PARTIES**

26 8. Plaintiff is a natural person who was employed by Defendant from January 11,
27 2021, to June 3, 2024.

28 9. Plaintiff is informed and believes, and based thereon, alleges that Defendant is,

1 and at all times mentioned in this complaint, has been a Delaware corporation, with its principal
2 headquarters at 410 Terry Avenue North, Seattle, Washington. On information and belief,
3 Plaintiff further alleges that Defendant is registered to do business in California under entity
4 number 3568304.

5 10. At all material times and for all purposes relevant to the claims made herein,
6 Plaintiff was an “employee” within the meaning of the California Government Code and
7 California Labor Code.

8 11. At all material times and for all purposes relevant to the claims made herein,
9 Defendant was an “employer” within the meaning of the California Government Code and
10 California Labor Code. Specifically, Defendant employs five or more employees in California.

11 12. Plaintiff is informed and believes, and based thereon, alleges that at all times
12 material hereto, each of the Defendants named herein (including the DOES) was/were the
13 ostensible agent, employee, alter ego and/or joint venturer of, or working in concert with each of
14 the other co-Defendants and was acting within the course and scope of such agency,
15 employment, joint venture, or concerted activity. To the extent said acts, conduct, and omissions
16 were perpetrated by certain Defendants, each of the remaining Defendants confirmed and ratified
17 said acts, conduct, and omissions of the acting Defendant.

18 **FACTUAL BACKGROUND**

19 13. Plaintiff began her employment with Defendant on or about January 11, 2021, as
20 “Product Manager.” Plaintiff performed her work remotely in the County of Contra Costa.

21 14. Plaintiff began her employment under the supervision of Gary Manalus.

22 15. Shortly thereafter, Plaintiff was assigned to a new manager, Irina Wolpert.

23 16. Under Ms. Wolpert’s supervision, Plaintiff performed her role successfully and
24 received only excellent performance ratings.

25 17. On or about February 14, 2022, as a result of Plaintiff’s positive performance,
26 Plaintiff was promoted to the role “Manager Product Management.”

27 18. Plaintiff continued to excel in her new role, as evidenced by a performance review
28 issued in or around March 2022, which rated her as having “exceeded Amazon’s high-

1 performance bar for [Plaintiff’s] role and level.”

2 19. In or around October 2022, Plaintiff was again promoted to the role of
3 “Senior Manager Product Management, L7.”

4 20. On or about November 16, 2022, Plaintiff was assigned to a new manager, Glen
5 Lally. Shortly thereafter, Plaintiff experienced a negative shift in her work environment,
6 characterized by Mr. Lally’s aggressive and micromanaging supervisory style.

7 21. Despite the negative shift in Plaintiff’s work environment under Mr. Lally,
8 Plaintiff performed beyond expectations which resulted in an increase in her team of direct
9 reports to ten people.

10 22. In or around March 2023, Plaintiff again received an exemplary performance
11 review, rating her specifically as having “met [Defendant’s] high-performance bar.”

12 23. On or about March 30, 2023, Mr. Lally, through a Team Change Announcement,
13 disclosed that Plaintiff and her female colleague, Tanya Seindel, would be reporting to his newly
14 recruited former male colleague, Matt Swearingen. Additionally, the announcement revealed that
15 Plaintiff’s female colleague, Sandi Sandiland, was instructed to report to Katherin Fan, a younger
16 and recently hired former colleague of Mr. Lally, while another colleague Carla Blickensderfer,
17 was expected to report to a male peer, Barney Brown.

18 24. On or about March 31, 2023, Plaintiff sent an email to Defendant’s General
19 Manager, Jerene Dekate, and Mr. Lally, to address her ongoing concerns with the discriminatory
20 impact and large reduction of women in leadership positions as a result of the layoffs that
21 occurred in or around the beginning of 2023. Specifically, Plaintiff shared her concerns of the
22 drastic reduction of women in leadership positions from 62.5 percent to only 28.6 percent.

23 25. In response, Mr. Lally, without discussing the content of Plaintiff’s concerns,
24 acknowledged the reduction cited by Plaintiff and asserted his commitment to “developing a
25 diverse leadership team,” and that he was nearing the finalization of hiring a single female leader
26 to lead Sales Process and Methodology.

27 26. On or about April 25, 2023, Plaintiff was officially assigned to a new manager,
28 Mr. Swearingen—a new hire of Defendant and Mr. Lally’s former male colleague. Despite

1 Plaintiff's longer tenure, greater familiarity with Defendant's current projects, and exceptional
2 performance record, she was assigned to report to Mr. Swearingen, a male colleague at her same
3 level (L7).

4 27. On or about July 12, 2023, Plaintiff was forced to forfeit and hand over her role as
5 the main liaison and contact for two of Defendant's Sales Operations teams, with whom Plaintiff
6 had previously cultivated relationships, to Mr. Swearingen, despite his inexperience with the
7 learning content development and communications with those teams. Simultaneously, Mr.
8 Swearingen reduced Plaintiff's direct reports from ten to four and prohibited Plaintiff from
9 conducting one-on-one meetings with leadership team members—a practice that had been
10 instrumental to her previous success.

11 28. On or about September 8, 2023, Plaintiff was informed that her role would
12 transition to a hybrid role beginning October 2023, requiring three in-person appearances at
13 Defendant's San Francisco office.

14 29. On or about December 12, 2023, Plaintiff was abruptly notified that she was
15 being placed on a Focus performance improvement plan.

16 30. Shortly after being placed on the plan, Plaintiff challenged her placement on the
17 performance improvement plan and reached out to Defendant's Human Resources (HR) to have
18 it removed from her employment record.

19 31. On or about January 16, 2024, Plaintiff met with Mr. Swearingen to discuss her
20 concerns about implementation of the Focus plan. During the meeting, Plaintiff and Mr.
21 Swearingen discussed areas for improvement while also agreeing that she was “highly effective
22 at executing” and that “customer obsession is a strength, which drives [Plaintiff's] leadership and
23 communication style.” Plaintiff also informed Mr. Swearingen of her intention to further contest
24 the implementation of the Focus plan, and that she had contacted Defendant's HR to remove the
25 plan from her record.

26 32. On or about February 12, 2024, Plaintiff met with Mr. Lally. During this meeting,
27 Mr. Lally commended Plaintiff and described her leadership as “bar raising” and “flawless.” Mr.
28 Lally's remarks echoed comments he had emailed in December 2023, where he recognized

1 Plaintiff's exceptional work with Defendant.

2 33. On February 19, 2024, Defendant's HR employee, Candice Ma, shared with
3 Plaintiff internal performance reviews about Plaintiff, authored by Mr. Swearingen.

4 34. The performance review by Mr. Swearingen included comments relating to
5 Plaintiff's age. Specifically, Mr. Swearingen labeled Plaintiff as being "closed off to new ideas
6 with [Plaintiff's] years of experience in product marketing'" and asserted that "Plaintiff had
7 previously been hesitant to accept suggestions due to [Plaintiff's] experience as an executive
8 comms writer."

9 35. On or about March 5, 2024, Plaintiff emailed Ms. Ma to request an update on her
10 request to remove the Focus plan from her AWS record. In the email, Plaintiff further outlined
11 why the Focus plan should be removed and cited the contradictory positive feedback she had
12 received from Mr. Lally, direct reports, and her peers.

13 36. On or about March 12, 2024, Ms. Ma notified Plaintiff that Mr. Swearingen and
14 Mr. Lally had agreed to Plaintiff's removal from the Focus plan as all conditions in the plan had
15 been met by Plaintiff. On or about March 15, 2024, despite being removed from the Focus plan,
16 Defendant's HR Partner, Brandon Dunaway, informed Plaintiff that the feedback underpinning
17 the Focus plan had been validated by HR and as a result, it could not be removed from Plaintiff's
18 permanent record.

19 37. On or about March 19, 2024, Mr. Swearingen delivered Plaintiff's first quarter
20 performance review for 2024. Notably, Plaintiff received a rating of meeting "Amazon's high-
21 performance bar" for the second time during her tenure at AWS.

22 38. On or around March 28, 2024, Plaintiff was once again recognized for her
23 outstanding performance when Mr. Lally awarded her the "All-Star" honor, citing her
24 exceptional leadership qualities and her successful efforts in launching the new Sales and
25 Marketing enablement project, AWSentral.

26 39. On or about April 3, 2024, Defendant announced a reorganization, purportedly to
27 "streamline" operations and "deliver maximum impact." On the same day, Plaintiff was
28 informed that she was among those being laid off, effective June 3, 2024—just days after

1 receiving high public praise for her leadership in successfully launching AWSentral.

2 40. A closer inspection of the employees affected by the layoff revealed that of the 75
3 employees terminated, forty-five (45) were aged forty or older. More significantly, among the
4 fifteen (15) employees offered severance packages—indicating their layoffs were not
5 performance-related—twelve (12) were over age forty.

6 41. Put another way, 60 percent of those laid off were aged forty or older, and of
7 those employees laid off for reasons other than performance issues, 80 percent were over the age
8 of forty.

9 42. Plaintiff's initial investigation further showed that at least seven women over forty
10 were targeted for termination.

11 43. Recognizing that the layoffs disproportionately impacted women and older
12 employees—similar to previous layoffs which Plaintiff had complaint to Defendant about—
13 Plaintiff filed a complaint with Defendant's Ethics Line, alleging that Mr. Swearingen and Mr.
14 Lally discriminated against her based on her gender and age in their decision to include her in the
15 layoffs.

16 44. Defendant concluded that after its investigation there were no "violations of
17 [Defendant's] policies or Standards of Conduct."

18 **CAUSES OF ACTION**

19 **First Cause of Action**
20 **Age Discrimination**
21 **(Violation of California Government Code § 12940(a))**

22 45. Plaintiff re-alleges and incorporates by reference all of the above paragraphs as if
23 they were set forth here in full.

24 46. California Government Code section 12940, subsection (a), prohibits an employer
25 from discharging a person from employment, or discriminating against a person in compensation
26 or in terms, conditions, or privileges of employment because of their age.

27 47. Plaintiff is a member of a group protected by the Fair Employment and Housing
28 Act (FEHA) and is protected by the FEHA's prohibition against age discrimination in California

1 Government Code section 12940, subsection (a). Specifically, Plaintiff was fifty-six (56) years
2 old when she was terminated by Defendant.

3 48. As noted above, Plaintiff was a successful, award-winning employee who
4 received two promotions in three years, and consistent praise for going above and beyond
5 Defendant’s expectations. Despite Plaintiff’s documented success, on or about March 30, 2023,
6 she was abruptly reassigned to report to Mr. Swearingen, a younger male peer who had only
7 recently joined Defendant’s organization.

8 49. Furthermore, on or about July 12, 2023, Plaintiff was directed to forfeit and hand
9 over her role as the main liaison and contact for two of Defendant’s Sales Operations with whom
10 Plaintiff had diligently cultivated relationships, to Mr. Swearingen, despite his lack of experience
11 and familiarity with these teams. Additionally, Mr. Swearingen reduced the number of Plaintiff’s
12 direct reports from ten to four, and prohibited Plaintiff from conducting one-on-one meetings
13 with Defendant’s leadership members.

14 50. On or about December 12, 2023, Plaintiff was unexpectedly placed on a Focus
15 improvement plan by Mr. Swearingen.

16 51. In addition, Plaintiff was made aware of an internal performance review authored
17 by Mr. Swearingen referencing Plaintiff’s age and experience, with Mr. Swearingen specifically
18 noting that Plaintiff was “closed off to new ideas with [Plaintiff’s] ‘years of experience in
19 product marketing’” and that Plaintiff had been “hesitant to accept suggestions due to
20 [Plaintiff’s] experience as an executive comms writer.”

21 52. On or about April 3, 2024, Plaintiff was terminated as part of Defendant’s
22 reorganization layoff. The layoff documents revealed that of the 75 employees terminated, forty-
23 five (45) were aged forty or older, and among the fifteen (15) employees offered severance
24 packages—indicating their layoffs were not performance-related—twelve (12) were over age
25 forty.

26 53. Additionally, Plaintiff’s investigation revealed that at seven women aged forty or
27 older were included in the layoff.

28

1 54. Plaintiff is informed and believes, and based thereon alleges, that her age was a
2 substantial motivating reason in Defendant's decision to diminish her role, place her on a Focus
3 improvement plan, and ultimately terminate her position.

4 55. As a direct and proximate result of Defendant's unlawful actions, Plaintiff has
5 suffered harm including lost wages and emotional distress, in an amount to be proven at trial.

6 56. On information and belief, in doing the acts herein alleged, Defendant acted with
7 oppression, malice, and in conscious disregard of Plaintiff's rights and she is therefore entitled to
8 exemplary damages in an amount according to proof at trial.

9 57. As a further proximate result of Defendant's conduct, Plaintiff was required to
10 and did retain attorneys and is therefore entitled to an award of attorneys' fees and costs
11 according to proof.

12 **Second Cause of Action**
13 **Gender Discrimination**
14 **(Violation of Cal. Gov't Code § 12940(a))**

15 58. Plaintiff re-alleges and incorporates by reference all of the above paragraphs as if
16 they were set forth here in full.

17 59. California Government Code section 12940, subsection (a), prohibits an employer
18 from discharging a person from employment, or discriminating against a person in compensation
19 or in terms, conditions, or privileges of employment because of their gender.

20 60. Plaintiff is a member of a group protected by the FEHA and is protected by the
21 FEHA's prohibition against gender discrimination in California Government Code section
22 12940, subsection (a).

23 61. On or about March 30, 2023, despite Plaintiff's history of excellent performance
24 throughout her tenure, Defendant reassigned her to report to Mr. Swearingen, a younger male
25 colleague who had only recently joined the organization.

26 62. Immediately following her reassignment, Plaintiff formally complained to her
27 supervisors about the significant gender disparity resulting from the recent organizational
28 changes. Specifically, Plaintiff noted that the recent reassignments, including her own, had

1 reduced female leadership representation by more than thirty percent (30%).

2 63. Following the reassignment, Plaintiff was forced to forfeit and hand over her role
3 as the main liaison and contact for two of Defendant's Sales Operations teams, with whom
4 Plaintiff had previously cultivated relationships, to Mr. Swearingen, despite his inexperience
5 with the learning content development and communications with those teams. Plaintiff's role
6 was further diminished by Mr. Swearingen's reduction of her direct report team from ten to four
7 and his prohibition on Plaintiff's ability to conduct one-on-one meetings with leadership
8 members—an integral part of her success.

9 64. On December 12, 2023, Defendant placed Plaintiff on a Focus improvement plan
10 despite her consistent performance. Plaintiff successfully challenged this action, with both of her
11 supervisors agreeing with her objections and approving the plan's removal. However,
12 Defendant's HR department subsequently undermined this resolution by informing Plaintiff that,
13 despite her supervisors' approval, the Focus plan would permanently remain in her employment
14 record.

15 65. On or about April 3, 2024, Plaintiff was informed that she was going to be part of
16 a group layoff intended to “streamline” operations and “deliver maximum impact.”

17 66. Plaintiff's initial investigation discovered that at least seven women over forty
18 were targeted for termination, suggesting a disproportionate impact on older female employees.

19 67. Plaintiff is informed and believes, and based thereon alleges, that her gender
20 was a substantial motivating reason in Defendant's decision to diminish her role, place her on a
21 Focus improvement plan, and ultimately terminate her position.

22 68. As a direct and proximate result of Defendant's unlawful actions, Plaintiff has
23 suffered harm including lost wages and emotional distress, in an amount to be proven at trial.

24 69. On information and belief, in doing the acts herein alleged, Defendant acted with
25 oppression, malice, and in conscious disregard of Plaintiff's rights and she is therefore entitled to
26 exemplary damages in an amount according to proof at trial.

27 70. As a further proximate result of Defendant's conduct, Plaintiff was required to
28 and did retain attorneys and is therefore entitled to an award of attorneys' fees and costs

1 according to proof.

2 **Third Cause of Action**
3 **Retaliation**
4 **(Violation of California Government Code §12940(h))**

5 71. Plaintiff re-alleges and incorporates by reference all of the above paragraphs as if
6 they were set forth here in full.

7 72. California Labor Code section 12940, subsection (h), prohibits employers from
8 discharging or discriminating against a person because they have opposed or complaint about
9 any practices forbidden under the FEHA.

10 73. On or about March 31, 2023, Plaintiff complained to her supervisors about
11 Defendant’s recent employee reassignments and layoffs that disproportionately impacted women
12 in leadership positions.

13 74. Plaintiff reasonably believed that Defendant’s conduct was discriminatory and
14 unlawful under the law.

15 75. On or about April 25, 2023, shortly after raising her concerns about Defendant’s
16 potentially discriminatory practice, Plaintiff was assigned to report to a younger, male, and
17 recent hire, Mr. Swearingen, who also held the same level as her (L7). In addition to Plaintiff’s
18 reassignment, Plaintiff was also compelled to transfer key stakeholder relationships that she had
19 “previously cultivated” to Mr. Swearingen, who lacked familiarity and experience with these
20 relationships. Moreover, Mr. Swearingen reduced Plaintiff’s number of direct reports from ten to
21 four and restricted her from holding one-on-one meetings with leadership members—an integral
22 part of her success.

23 76. On or about December 12, 2023, contrary to Plaintiff’s established stellar
24 performance record, Plaintiff was placed on a Focus improvement plan. While Plaintiff initially
25 succeeded in challenging the Focus plan, Defendant ultimately ruled that the Focus improvement
26 plan could not be removed from her permanent employment record.

27 77. On or about April 3, 2024, announced a reorganization that resulted in a mass
28 layoff including Plaintiff. Pursuant to the terms of the layoff, Plaintiff’s inclusion in the layoff

1 was not predicated by any performance issues.

2 78. Plaintiff is informed and believes, and based thereon, alleges that her complaint
3 about Defendant's discriminatory conduct towards women was a substantial factor in
4 Defendant's decision to diminish Plaintiff's role, place Plaintiff on a Focus performance
5 improvement plan, and ultimately terminate her employment.

6 79. As a direct and proximate result of Defendant's unlawful actions, Plaintiff has
7 suffered harm including lost wages and emotional distress, in an amount to be proven at trial.

8 80. On information and belief, in doing the acts herein alleged, Defendant acted with
9 oppression, malice, and in conscious disregard of Plaintiff's rights and she is therefore entitled to
10 exemplary damages in an amount according to proof at trial.

11 81. As a further proximate result of Defendant's conduct, Plaintiff was required to
12 and did retain attorneys and is therefore entitled to an award of attorneys' fees and costs
13 according to proof.

14 **Fourth Cause of Action**
15 **Retaliation**
16 **(Violation of California Labor Code § 1102.5)**

17 82. Plaintiff re-alleges and incorporates by reference all of the above paragraphs as if
18 they were set forth here in full.

19 83. Labor Code section 1102.5, subsection (b), prohibits an employer from retaliating
20 against any employee who makes an internal complaint about an issue which the employee
21 reasonably believes is a violation of state or federal statute, or noncompliance with a local, state,
22 or federal regulation.

23 84. Plaintiff reasonably believed that Defendant's employee reassignment process that
24 resulted in a drastic reduction of women in leadership positions was discriminatory to women
25 and thus constituted a violation of the law.

26 85. Consequently, on or about March 31, 2023, Plaintiff complained about
27 Defendant's discriminatory conduct to her supervisors. Instead of meaningfully engaging with
28 Plaintiff's concerns or discuss the content of her concerns, Defendant simply brushed her

1 concerns aside and subjected her to a series of adverse employment actions until the end of her
2 employment with Defendant.

3 86. Shortly after reporting what Plaintiff believed to be unlawful conduct, Plaintiff
4 was assigned to report to Mr. Swearingen, a male and relatively new hire who was also at the
5 same level (L7) as Plaintiff.

6 87. On or about July 12, 2023, Plaintiff was compelled to transfer ownership of two
7 stakeholder relationships which she had "previously cultivated" to Mr. Swearingen, who had
8 little to no familiarity and experience with said relationships; Plaintiff was forced to reduce the
9 number of her direct reports from ten to four; and Plaintiff was restricted from holding 1:1
10 meetings with members of the leadership team.

11 88. On or about December 12, 2024, Mr. Swearingen placed Plaintiff on a Focus
12 improvement plan, contrary to all of the positive feedback she had previously received, which
13 Plaintiff successfully challenged and was ultimately removed from after asserting the plan's
14 implementation lacked proper basis.

15 89. On or about April 3, 2024, Plaintiff was informed that she was going to be
16 included in a mass layoff. Importantly, and pursuant to the terms of the layoff, Plaintiff's layoff
17 was in no way related to any performance issues.

18 90. Plaintiff is informed and believes, and based thereon, alleges that her complaint
19 about Defendant's discriminatory conduct was a contributing factor in Defendant's decision to
20 diminish Plaintiff's role, place Plaintiff on a Focus performance improvement plan, and
21 ultimately terminate her employment.

22 91. As a direct and proximate result of Defendant's unlawful actions, Plaintiff has
23 suffered harm including lost wages and emotional distress, in an amount to be proven at trial.

24 92. On information and belief, in doing the acts herein alleged, Defendant acted with
25 oppression, malice, and in conscious disregard of Plaintiff's rights and he is therefore entitled to
26 exemplary damages in an amount according to proof at trial.

27 93. As a further proximate result of Defendant's conduct, Plaintiff was required to
28 and did retain attorneys and is therefore entitled to an award of attorneys' fees and costs

1 according to proof.

2 **Fifth Cause of Action**
3 **Wrongful Termination in Violation of Public Policy**

4 94. Plaintiff re-alleges and incorporates by reference all of the above paragraphs as if
5 they were set forth here in full.

6 95. It is the policy of the State of California to prevent employers from terminating an
7 employee because of their age.

8 96. It is the policy of the State of California to prevent employers from terminating an
9 employee because of their gender.

10 97. It is the policy of the State of California to prevent employers from retaliating
11 against an employee for complaints made related to unlawful behavior under the FEHA.

12 98. It is the policy of the State of California to prevent employers from retaliating
13 against an employee for complaints made related to unlawful behavior under the law.

14 99. As discussed above, Plaintiff complained about Defendant's discriminatory
15 conduct that disproportionately reduced women in leadership roles. From that point forward,
16 Plaintiff's employment with Defendant was subjected to a series of adverse actions that
17 diminished her role, unjustifiably placed her on a Focus improvement plan, and ultimately led to
18 her termination.

19 100. As a direct and proximate result of Defendant's unlawful actions, Plaintiff has
20 suffered harm including lost wages and emotional distress, in an amount to be proven at trial.

21 101. On information and belief, in doing the acts herein alleged, Defendant acted with
22 oppression, malice, and in conscious disregard of Plaintiff's rights and she is therefore entitled to
23 exemplary damages in an amount according to proof at trial.

24 102. As a further proximate result of Defendant's conduct, Plaintiff was required to
25 and did retain attorneys and is therefore entitled to an award of attorneys' fees and costs
26 according to proof.

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PRAYER


WHEREFORE, Plaintiff prays for judgment and the following specific relief against Defendant as follows:

1. Declaratory Judgment finding the Defendant’s conduct, as alleged herein, violated Plaintiff’s rights pursuant to the California Government Code and California Labor Code;
2. For injunctive relief requiring Defendant to conduct training for supervisors, and management on the requirements of the FEHA, the rights and remedies of those who alleges a violation of the FEHA, and to permanently prohibit Defendant from engaging in any future discriminatory or retaliatory acts against Defendant’s employees;
3. Award of general damages;
4. Award of special damages;
5. Award of exemplary damages;
6. Award of reasonable attorneys’ fees and costs; and
7. For such other and further relief as the Court deems proper.

Dated: March 19, 2025

Respectfully submitted,

QUINTANA HANAFI, LLP

By:  _____
Ramsey Hanafi
Gelian Belong
Attorneys for Plaintiff
Joanne Stockwell

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EXHIBIT A



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 14, 2025

Gelian Belong
1939 Harrison St., Ste. 202
Oakland, CA 94612

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202503-28524114
Right to Sue: Stockwell / Amazon Web Services, Inc.

Dear Gelian Belong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 14, 2025

RE: Notice of Filing of Discrimination Complaint
CRD Matter Number: 202503-28524114
Right to Sue: Stockwell / Amazon Web Services, Inc.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 14, 2025

Joanne Stockwell

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202503-28524114
Right to Sue: Stockwell / Amazon Web Services, Inc.

Dear Joanne Stockwell:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 14, 2025 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Joanne Stockwell

CRD No. 202503-28524114

Complainant,

vs.

Amazon Web Services, Inc.
410 Terry Avenue North
Seattle, WA 98109

Respondents

1. Respondent **Amazon Web Services, Inc.** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant **Joanne Stockwell**, resides in the City of , State of .

3. Complainant alleges that on or about **June 3, 2024**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sex/gender, age (40 and over) and as a result of the discrimination was terminated, laid off, demoted.

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment and as a result was terminated, laid off, demoted.

Additional Complaint Details:

1 VERIFICATION

2 I, **Gelian Belong**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based on
4 information and belief, which I believe to be true. The matters alleged are based on
5 information and belief, which I believe to be true.

6 On March 14, 2025, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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Oakland, California