

# EXHIBIT 30





**JORGE FEIJOO's EEOC PARTICULARS**

- 1.) Respondent, Costco Wholesale Corporation (“Respondent” or “Costco”), is an American multinational corporation which operates a chain of membership-only warehouse clubs.
- 2.) I began working for Respondent as a Forklift Operator on November 19, 1992. I was given numerous glowing reviews and raises during my 27+ year tenure at Costco. I was wrongfully terminated on April 14, 2020.
- 3.) I suffer from tinnitus, which significantly impairs my hearing. As a result of my condition, I am completely deaf in my right ear and 75% deaf in my left ear. Despite my disability, I was able to perform all the essential functions of my job with reasonable accommodations. I made Costco aware of my disability and notified my managers when I had doctors’ appointments, which were routinely scheduled on Fridays. Additionally, I informed my manager that I needed Fridays off because of my doctor’s appointments.
- 4.) Just a few months prior to my termination, I told Costco that I planned to retire when I turned 59 and a ½ years old during a performance evaluation meeting. As I continued to work looking forward to my future retirement, I realized that I was being subjected to increasingly negative treatment. Specifically, I was accused of being rude and was written up for that alleged behavior. However, in this instance, another employee was speaking to me, but I was unable to hear her because of my disability. Even though I explained this to my superiors, I was still written up. My schedule, that I had for more than ten (10) years, was also changed and I was put on a schedule that required me to work seven (7) days per week. I worked several weeks straight without one day off.
- 5.) I complained to Kim Brown, the District Manager, about the negative treatment I was experiencing at work. I also notified her that the change in my schedule interfered with my Friday doctor’s appointments where I received medical care relating to my disability. Costco did not engage in the interactive process to see if my requests to regain Fridays off for my doctor’s appointments could be accommodated. Instead, I was told by Mr. Polloreno, my store’s General Manager, that Costco did not care about my doctor’s appointments and I needed to just schedule them around my new work schedule. I even tried to present alternatives to try and get the accommodation that I needed, including offering to perform different jobs in the store so that I could regain my previous schedule. However, my efforts were not well received.
- 6.) Ultimately, I was wrongfully accused of getting into a physical altercation with a co-worker. In fact, I was the person who was physically assaulted by another co-worker. On April 3, 2020, a seasonal worker who was recently hired named Chris (last name unknown), confronted me while I was working. Part of my job duties included me



dropping merchandise to get stocked, using a forklift. I was performing this duty when Chris confronted me angrily and told me that I was dropping too much merchandise. I was in fact properly performing my job. Chris further repeatedly yelled and cursed at me, stating that he did not want to work anymore, and he was ready to go home. Chris was irate because I was dropping merchandise which he did not want to have to stock. Confused by Chris' belligerent yelling and cursing, I got down from my forklift to discuss the situation with Chris. Then, suddenly, and unexpectedly without provocation, Chris pushed me and then ran off as the manager approached. I never returned physical contact after I was assaulted. Unfortunately, I was still wrongfully accused of getting into a fight at work and was suspended and then terminated. Upon information and belief, Chris (who is outside of my protected classes based on age and disability) did not face such adverse action.

- 7.) I believe that I have been discriminated against on the basis of my age (at the time of my termination 58 years old) and disability/perceived disability (tinnitus) disability/perceived disability and retaliated against in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. Section 2000(e), The Americans with Disabilities Act of 1990 and/or Americans with Disabilities Amendments Act of 2008 (ADA, ADAA), Section 21 of the Texas Labor Code, and the Texas Commission on Human Rights Act and the Age Discrimination in Employment Act (ADEA) of 1967, 29 U.S.C. Sections 621-634.
- 8.) The information provided in this Charge of Discrimination is provided for the express purpose of assisting the Equal Employment Opportunity Commission and/or the Texas Commission on Human Rights with its investigation of this claim. This information is not meant to be exhaustive or all encompassing, but rather to give the respondent fair notice of the claims being asserted herein. This information is not being provided so that an attorney representing the Respondent at some later date in the defense of a trial stemming from this Charge can use it to insinuate that it is inclusive to the last detail of the sum of the allegations being advanced against the Respondent.