1 2 3 4 5 6 7 8 9 110	HARMEET K. DHILLON (SBN: 207873) harmeet@dhillonlaw.com RAVDEEP S. GREWAL (SBN: 308447) rgrewal@dhillonlaw.com GREGORY R. MICHAEL (SBN: 306814) gmichael@dhillonlaw.com DHILLON LAW GROUP INC. 177 Post Street, Suite 700 San Francisco, California 94108 Telephone: (415) 433-1700 Facsimile: (415) 520-6593 Attorneys for Plaintiffs James Damore, David Omanuel Amador, Stephen McPherson, and Micon behalf of themselves and all others similarly	hael Burns
11 11 12	SUPERIOR CO	URT OF CALIFORNIA
13	COUNTY OF SANTA CLAR	RA – UNLIMITED JURISDICTION
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	JAMES DAMORE, DAVID GUDEMAN, MANUEL AMADOR, STEPHEN MCPHERSON, and MICHAEL BURNS, individually and on behalf of all others similarly situated, Plaintiffs, v. GOOGLE, LLC, a Delaware limited liability company; and DOES 1-10, Defendants.	FIRST AMENDED CLASS ACTION COMPLAINT: 1. Violation of Cal. Labor Code § 1101 2. Violation of Cal. Labor Code § 1102 3. Workplace Discrimination Due to Gender and/or Race in Violation of FEHA 4. Disparate Impact Discrimination Due to Gender and/or Race in Violation of FEHA 5. Workplace Harassment in Violation of FEHA 6. Retaliation in Violation of FEHA 7. Retaliation in Violation of Public Policy 8. Retaliation in Violation of Cal. Lab. Code § 1102.5 9. Failure To Prevent Harassment, Discrimination, and Retaliation 10. Hostile Workplace Environment 11. Unfair Business Practices, Bus. & Prof. Code § 17200 et seq. 12. Declaratory Relief DEMAND FOR JURY TRIAL



DTC DHILLON LAW GROUP INC.

1. James Damore ("Damore"), David Gudeman ("Gudeman"), Manuel Amador ("Amador"), Stephen McPherson ("McPherson"), and Michael Burns ("Burns," together, "Plaintiffs"), through their attorneys, Dhillon Law Group Inc., file this First Amended Complaint ("FAC") against Google, LLC ("Google"), a Delaware limited liability company, and DOES 1-10 (Google and Does, collectively, "Defendants"). Upon personal knowledge, or, if so indicated, upon information and belief, Plaintiffs allege as follows:

CASE SUMMARY

- 2. Plaintiffs bring this individual and class action on behalf of themselves and on behalf of a class and subclasses defined as all employees and job applicants of Google discriminated against (i) due to their actual or perceived conservative political views and activities by Google in California at any time during the time period beginning four years prior to the filing of the initial complaint in this action filed on January 8, 2018 through the date of trial ("Political Class Period"); (ii) due to their male gender by Google in California at any time during the time period beginning one year prior to the filing of the initial complaint in this action filed on January 8, 2018 through the date of trial ("Gender Class Period"); and/or (iii) due to their actual or perceived Caucasian or Asian race by Google in California at any time during the time period beginning one year prior to the filing of the initial complaint this action filed on January 8, 2018 through the date of trial ("Race Class Period") (Political Class Period, Gender Class Period, and Race Class Period referred to collectively, as "Class Periods"). These violations also subject Google to claims for violation of California's Business and Professions Code § 17200 *et seq.*
- 3. Google's officers, based in California, have maintained control over employees' terms and conditions of employment, including but not limited to, employees' job and location assignment, career progression, promotion, compensation, hiring, reprimand, and termination policies, practices, and procedures, including all employees located in California. Google has uniformly applied these policies, practices, and procedures to all employees throughout its California offices.
- 4. Throughout the Class Periods, and in violation of California law, Google employees who expressed views deviating from the majority view at Google on political subjects raised in the workplace and relevant to Google's employment policies and its business, such as "diversity" hiring

DIG DHILLON LAW GROUP INC. policies, "bias sensitivity," or "social justice," were/are singled out, mistreated, and systematically punished and/or terminated from Google, in violation of their legal rights.

- 5. Google's open hostility for conservative viewpoints is paired with invidious discrimination on the basis of race and gender, barred by law. Google's management goes to extreme—and illegal—lengths to encourage hiring managers to take protected categories such as race and/or gender into consideration as determinative hiring factors, to the detriment of members of disfavored races and males who are employees or potential employees at Google.
- 6. Damore, Gudeman, Amador, and other class members were ostracized, belittled, and punished for their heterodox political views. Damore and Gudeman were additionally ostracized, belittled, and punished for the added sin of their birth circumstances of being a member of a race and/or sex that Google perceives to be overrepresented in its workforce, namely, white/Caucasian or Asian ("Google-disfavored races") and/or male employees. This is the essence of discrimination—Google formed opinions about, and then treated, Plaintiffs based not on their individual merits, but rather on their membership in groups with assumed characteristics.
- 7. Google employees and managers strongly prefer to hear the same orthodox opinions regurgitated repeatedly, producing an ideological echo chamber, a protected, distorted bubble of groupthink. When employee Plaintiffs challenged Google's illegal employment practices, they were openly threatened and subjected to harassment and retaliation from Google. Google created an environment of protecting employees who harassed individuals who spoke out against Google's view or the "Googley way," as it is sometimes known internally. Google employees knew they could harass Plaintiffs with impunity, given the tone set by managers—and they did so.
- 8. Amador, McPherson, Burns, and other class members were denied employment because of their actual and perceived conservative political activities and affiliations, and their status as actual or perceived Asian or Caucasian male job applicants. Google purposefully perpetuates and preserves its pattern of discrimination, harassment, and retaliation by rejecting applicants who are, or who appear to be, conservative, white/Caucasian, Asian, or male, particularly where those applicants might speak out against Google's unlawful employment practices.
 - 9. Google employs illegal hiring quotas to fill its desired percentages of women and



racially-favored minority candidates, and openly shames managers of business units who fail to meet their quotas—in the process, openly denigrating employees who are, or are perceived to be, male and/or a member of a Google-disfavored race.

- 10. Not only was the numerical presence of women celebrated at Google solely due to their gender, but the presence of Google-disfavored races and males was mocked during companywide weekly meetings. This unacceptable behavior occurred at the hands of high-level managers at Google who were responsible for hundreds, if not thousands, of hiring and firing decisions during the Class Periods.
- 11. Plaintiffs bring this action to vindicate their legal rights, and to stop Google from repeating these practices against other employees and prospective employees now, and in the future.

THE PARTIES

- 12. Damore is an individual who, at all times relevant to the Complaint, worked in Mountain View, California for Google as a Senior Software Engineer, a Software Engineer, and an Intern. Damore was an employee of Google from 2013 until his wrongful termination on August 7, 2017.
- 13. Gudeman is an individual who, at all times relevant to the Complaint, worked in Mountain View, California for Google as a Software Engineer. Gudeman was an employee of Google until his wrongful termination. Gudeman worked for Google from 2013 to December 2016.
- 14. Amador is an individual who currently resides in Zurich, Switzerland. Amador worked for Google in San Francisco, California beginning in 2013, then transferred to Google's Zurich, Switzerland offices. In or around April 2017, Amador reapplied for multiple positions with Google its office located in Mountain View, California.
- 15. McPherson is an individual who temporarily resides in Naples, Italy, as a result of his current employment. McPherson resided in San Diego, California at the time of applying for a project manager position at Google in mid-2016, and thereafter interviewed for the position in Mountain View, California, which was ultimately not offered to McPherson.



- 16. Burns is an individual who currently resides in Colorado. At all times relevant to the FAC, Burns resided in Castro Valley, California, including in June 2017, when he applied for a position at Google's Sunnyvale, California offices, and was denied employment.
- 17. Google is a corporation that, at all times relevant to the Complaint, was incorporated under the laws of the state of Delaware, with its principal place of business in Santa Clara County, California. Google is registered with the California Secretary of State for the purpose of transacting business in California. Google is or was the direct employer of Damore, Gudeman, and Amador, and refused to hire or rehire Amador, McPherson, and Burns.
- 18. Upon information and belief, Plaintiffs allege that DOES 1 through 10 are the partners, agents, owners, shareholders, managers, or employees of Defendants, and are, or at relevant time were, acting on their behalf. Plaintiffs are unaware of the true names or capacities of the Defendants sued herein under the fictitious names DOES 1 through 10, but prays for leave to amend and serve such fictitiously named Defendants once their names and capacities become known.

JURISDICTION AND VENUE

- 19. This Court has jurisdiction over this action pursuant to the California Constitution, Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes except those given by statute to other courts."
- 20. This Court has jurisdiction over all Defendants because, upon information and belief, each Defendant is either a citizen of California, has sufficient minimum contacts in California, or otherwise intentionally avails himself or itself of the California market so as to render the exercise of jurisdiction over it or him by the California courts consistent with traditional notions of fair play and substantial justice.
- 21. Venue is proper in this Court because Google's principal place of business is located in this County, Google listed this County as the location of its principal office in filings with the California Secretary of State, and most of the unlawful practices, acts, and omissions alleged herein took place in this County.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

- 22. On November 30, 2017, Damore filed an administrative complaint against Google with the California Department of Fair Employment and Housing ("DFEH") and was issued a right-to-sue letter.
- 23. On November 30, 2017, Gudeman filed an administrative complaint against Google with the DFEH and was issued a right-to-sue letter.
- 24. On February 27, 2018, Amador filed an administrative complaint against Google with the DFEH and was issued a right-to-sue letter.
- 25. On January 29, 2018, Burns filed an administrative complaint against Google with the DFEH and was issued a right-to-sue letter.
- 26. Damore, Gudeman, Amador, McPherson, and Burns exhausted the necessary administrative remedies by filing the above-referenced charges of discrimination and/or retaliation with the DFEH and obtaining right-to-sue letters.

FACTUAL ALLEGATIONS OF NAMED PLAINTIFFS JAMES DAMORE

Damore's Employment with Google

- 27. Damore received his Bachelor of Science degree in Molecular Biology, Physics, and Chemistry from the University of Illinois at Urbana-Champaign. He then earned his Master of Science in Systems Biology from Harvard University.
- 28. Damore first began working for Google as a Harvard student in or around the summer of 2013 as a Ph.D. software intern. By around December 2013, Google converted this internship into a full-time position, and hired Damore as a Software Engineer.
- 29. Damore worked on the Google team responsible for indexing and serving Google's search results to users.
- 30. Damore was diligent and loyal, and received substantial praise for the quality of his work. Damore received the highest possible rating twice, including in his most recent performance review, and consistently received high performance ratings, placing him in the top few percentile of Google employees. Throughout the course of his employment with Google, Damore received



approximately eight performance bonuses, the most recent of which was approximately 20% of his annual salary. Damore also received stock bonuses from the Google amounting to approximately \$150,000 per year.

- 31. Damore was never disciplined or suspended during his entire tenure at Google.
- 32. Based on Damore's excellent work, Damore was promoted to Senior Software

 Engineer in or around January 2017—just eight months before his unlawful termination by Google.
- 33. Damore did not have any direct reports, did not supervise employees, did not assign work to other employees, and was not an integral or crucial part of the hiring and firing process at Google. Damore was not allowed to discipline employees.
- 34. Damore's immediate supervisor was Cristian Tapus ("Tapus"). Tapus reported to Chuck Wu ("Wu"), Senior Director of Engineering for Google. Wu, in turn, reported to Ari Balogh ("Balogh"), Vice President of Engineering at Google. Balogh reported to Sridhar Ramaswamy ("Ramaswamy"), the Senior Vice President of GPI and Ads. Ramaswamy, in turn, reported to Sundar Pichai ("Pichai"), the CEO of Google, who ultimately reported to Larry Page ("Page"), the CEO of Alphabet, Inc.

Google Shamed Teams Lacking Female Parity at TGIF Meetings

- 35. On March 30, 2017, Damore attended a weekly company-wide meeting called a "TGIF meeting." These weekly meetings were used as an avenue for employees to connect and discuss certain topics involving Google.
- 36. The TGIF meeting on March 30, 2017 was entitled "Women's History Month," and Google brought in two presenters for this get-together: Ruth Porat ("Porat"), the Chief Financial Officer of Google, and Eileen Naughton ("Naughton"), the Human Resources Vice President of Google.
- 37. During the March 30, 2017 TGIF meeting, either Porat or Naughton pointed out and shamed individual departments at Google in which women comprised less than 50% of the workforce. Alternatively, they applauded and praised departments, such as the sales department, where women comprised more than 50% of the workforce. The audience joined in to the group shaming/criticism.
 - 38. During the event, Porat and Naughton also discussed that when looking at groups of

people for promotions or for leadership opportunities on new projects, Google would be taking into account gender and ethnic demographics. They then mentioned that Google's racial and gender preferences in hiring were not up for debate, because the racial and gender preferences were morally and economically beneficial for Google.

39. Damore was surprised by Google's position on blatantly taking gender into consideration during the hiring and promotion processes, and by Google's public shaming of Google business units for failing to achieve numerical gender parity. Damore believed that express gender preferences and quotas were inconsistent with applicable discrimination laws. This TGIF meeting was one of the factors that led to Damore attending Google's Diversity and Inclusion Summit.

Google's Diversity and Inclusion Summit

- 40. In or about June 2017, Damore attended a "Diversity and Inclusion Summit" ("Summit") conducted by Google at its Mountain View campus. Approximately 100 employees attended this event. Damore felt pressured to attend the event because Google proclaims "commitment to diversity and inclusion" to be an important factor in deciding promotion to leadership positions. Due to his excellent work performance, Damore was on the path to a leadership position at Google before his abrupt termination.
- 41. The Summit was organized by Google's senior vice presidents and other members of Google's leadership team, including Balogh and Ramaswamy. Employees were allowed to ask questions, and there were also breakout groups for subsequent conversations.
- 42. The Summit covered general topics such as how Google could increase its diversity. Specifically, the Google presenters went through some Google policies purportedly designed to accomplish diversity goals, such as treating preferred categories of people (women, certain but not all ethnic minority groups, disabled, etc.) differently during the hiring process by providing extra interviews, and putting applicants into a more welcoming environment based on their race and/or gender. The Google presenters also discussed putting "diverse" individuals into high priority queues, so that they were more likely to be hired, and hired faster.
- 43. Google defined "diverse" individuals as women or individuals who were not Caucasian or Asian.



44. At the Summit, Damore spoke with Meghana Rao ("Rao") from Google's Human Resources department ("Google HR"). Damore told Rao that he believed some of the positions taken by Google were divisive and misguided. Specifically, Damore mentioned that it seemed like Google was elevating political correctness over merit.

- 45. Rao responded to Damore's comment by stating "some of the political things at Google were a problem." They discussed how some Google employees with conservative views and values did not feel included, and Rao mentioned how she, and other Google HR representatives, had received similar complaints in the past from employees with conservative views. Rao identified Damore as a conservative at that time, based upon his objections to Google's stated racial, gender, and other hiring preferences.
- 46. Notes from a Summit meeting, created by Google management employees, included a section entitled "Political Diversity," stating: "There seem to be people on the "right" end of the political spectrum that don't feel they are respected. And some people (including in leadership) have expressed that some right-leaning political values shouldn't be respected (also some left-leaning political values)."
- 47. While at the Summit, Damore participated in breakout group sessions with other employees. Damore asked questions about whether Google looked at viewpoint diversity with respect to hiring decisions and in evaluating how inclusive Google was as a workplace. The answer he received was that Google only looked at demographic diversity (mainly gender and/or race) when making hiring and promotion decisions—not at viewpoint diversity.
- 48. At the end of the program, the Google presenters specifically asked employee attendees to give written feedback on the program. This request from Google prompted Damore to draft a memorandum entitled "Google's Ideological Echo Chamber."

Damore's Memorandum on Google's Ideological Echo Chamber

49. On or about the end of June 2017, after Google asked for feedback on the contents of the Summit, Damore spoke with different Google employees about the issues they felt were not evenly covered at the Summit, and drafted a memorandum ("memo") based on those conversations. Multiple employees made suggestions and provided feedback, and this memo was edited multiple times.



Damore named this memo "go/pc-considered-harmful," using Google's own naming conventions. A copy of the final version of the memo with all the edits incorporated is attached as **Exhibit A.**

- 50. Damore observed in the memo that Google employees and management focus greatly on alleged unconscious racial and gender bias, but neglect political orientation, which is actually a result of deep moral bias.
- 51. Damore specifically stated in the memo that his purpose for writing the memo was to promote discussion among Google employees regarding the "diversity and inclusion" issues covered in the Summit. He wrote, "Open and honest discussion with those who disagree can highlight our blind spots and help us grow, which is why I wrote this document." Damore further stated, "Of course, I may be biased and only see evidence that supports my viewpoint. In terms of political biases, I consider myself a classical liberal and strongly value individualism and reason. I'd be very happy to discuss any of the document further and provide more citations."
- 52. The memo then went on to discuss the differences in political ideologies between the leftist liberals and the rightist conservatives, and suggested that neither ideology on its own was "100% correct," but that a balance between the two would be best for society and Google. The memo then identified Google as having a leftist bias.
- 53. Damore's memo went on to discuss conclusions reached in scientific studies, and included hyperlinks to the studies Damore referenced. The memo linked to articles and studies from the Wiley Online Library, the *Journal of Personality and Social Psychology, Quillette*, the *British Journal of Guidance and Counseling*, and *The Atlantic*. These citations were provided for the purpose of identifying potential alternative bases for differential workplace patterns at Google, as compared to the sole reason that Google provided—namely, hiring/employment bias against women and racial minorities. Google, and certain employees and outsiders who eventually read this memo, ignored these citations, and later publicly attributed the conclusions drawn from these studies directly to Damore himself.
- 54. After identifying possible non-bias causes for the so-called gender gap identified as an issue in the tech industry, Damore went on to suggest non-discriminatory ways of reducing the gender gap that did not involve the illegal racial and gender quotas and preferences that Google openly admits



to having employed.

- 55. Damore's memo then explained the harms of Google's current method of simply looking at an individual's race and/or gender when deciding who to hire, as it effectively lowered the bar for Google-favored minorities (individuals that were not Caucasian or Asian) and women and increased tensions between employees. Furthermore, Damore pointed out that Google's current method of increasing diversity resulted in what is known as reverse discrimination, because Caucasian and Asian males were not being selected for jobs and promotions due solely to their status as non-females or as members of a Google-disfavored race.
- 56. Damore ended his memo by addressing the problem in a constructive manner, advocating that Google should treat employees and potential hires as individuals, not members of tribes:
 - "I hope it's clear that I'm not saying that diversity is bad, that Google or society is 100% fair, that we shouldn't try to correct for existing biases, or that minorities have the same experience of those in the majority. My larger point is that we have an intolerance for ideas and evidence that don't fit a certain ideology. I'm also not saying that we should restrict people to certain gender roles; I'm advocating for quite the opposite: treat people as individuals, not as just another member of their group (tribalism)."
- 57. Damore also suggested more concrete steps that Google could take to remedy its problematic/illegal tribalist approach, including stopping the alienation of conservatives, recognizing the fact that Google has its own biases and confronting those, and having open and honest discussions.

Damore Posted the Memo Internally

- 58. Damore submitted the memo to Google HR using the feedback form provided by the Google presenters at the Summit.
- 59. Damore's memo was written entirely on Google's GoogleDocs systems. The comments section of the memo was left open for other Google employees to leave their thoughts on the document from the day Damore drafted the document to the day Damore was terminated. This document was not hidden in any manner.
- 60. Damore published multiple versions of the memo, internally, each version altered after receiving solicited, individual feedback from numerous Google employees.
 - 61. On July 3, 2017, at the suggestion of a co-worker, Damore posted the memo on a



Google group discussion forum called CoffeeBeans. CoffeeBeans was an internal Google forum used to discuss various issues at Google, such as workplace diversity.

- 62. In parallel with the discussion group created in CoffeeBeans, Damore emailed individuals responsible for Google's diversity programs, the Women at Google Program, the Code of Conduct team, and Google HR. Damore also asked whether certain diversity programs that were aimed at helping individuals on the basis of their gender or race, such as "Women Who Code," "BOLD" (an internship program offered only to women and underrepresented minorities), and "Stretch" (a class Google offers only to women) were legal, and asked how using someone's protected status, such as race and/or gender, in making employment decisions, was legal.
- 63. Damore emailed the Google Code of Conduct team to state that he believed some of Google's policies were not being applied equally, and were being violated. The Code of Conduct team referred Damore to Google HR for further action on his concerns. Damore's complaint about Google's illegal hiring and employment practices was never investigated or pursued by Google HR, other than by firing him.
- 64. The Women at Google group responded to Damore, and stated that its goal was 50% representation of women at Google. On or about June 2017, Damore met with an individual from the Women at Google group named "Monica" to further discuss his memo, and the organization's goals. Monica agreed that Damore had a valuable perspective and should share that perspective with the diversity teams, and she promised to connect Damore with such diversity teams, but she never did so, despite Damore's repeated requests.

Diversity Training Event

- 65. On or about July 2017, after the Diversity and Inclusion Summit, Google held another diversity training class ("Diversity Training") at its Mountain View headquarters. Damore attended this event based on his similar motivations for attending the Summit—namely, because Google factored "diversity and inclusion" into its employment advancement opportunities, and because of his concerns about Google's employment practices and diversity programs.
- 66. The Diversity Training was broken into two parts: 1) an online course, followed by, 2) an in-person training.



67. Damore provided feedback in response to the online portion of the Diversity Training, by asking whether Google accounted for political viewpoint bias in the workplace, since Google was addressing other biases. Google's only response was that Damore should attend the in-person training.

- 68. At the in-person training, entitled "Bias Busting," Google discussed how biases against women exist in the workplace, and how "white male privilege" exists in the workplace. The training was run by the "Unbiasing Group" at Google, and there were approximately 20 Google employees present. Damore disagreed with this one-sided approach. When Damore verbalized his dissent and his concerns with the one-sided presentation, other employees, including managers, laughed at him derisively. They considered his views to be conservative, and thus flawed and worthy of disparagement.
- 69. At the end of the Diversity Training, the presenters asked the audience members to submit any written feedback they might have to them. In response, Damore electronically submitted the memo he had drafted, which had been updated multiple times with comments and feedback from other Google employees, once again to Google HR. Google HR once again ignored Damore, and did not respond to the memo in any way.
- 70. On or about August 2, 2017, at the suggestion of a Google manager, Damore submitted the edited memo to skeptics@google.com ("Skeptics"), another message board for Google employees only. Damore explicitly stated that the purpose of submitting the memo to the group was for Google employees to discuss different views and look at matters from a different perspective, including the conservative perspective; otherwise, all Google employees would simply hear their same opinions repeated over and over again, and never enrich their employment or their experiences with different viewpoints.
- 71. Within the next few days after Damore published the memo on the Skeptics forum, the memo became more and more widely viewed on the internal Google forums.
- 72. On or about August 4, 2017, an unknown Google employee leaked the memo to either Vice Motherboard or Gizmodo, which selectively quoted from the memo and misinterpreted it. This "news story," distorting Damore's internal memo on workplace issues, was picked up by other media outlets, until Damore's memo went viral across the world.



On August 4, 2017, Damore attended a meeting with Rao and another representative from Google HR. At the meeting, Rao stated that Google was aware of Damore's memo, and although Google could not ask him to take it down because it was protected political speech, they still thought it was in his best interest to do so. Damore understood from this meeting that Google was threatening him with termination for his internal speech about workplace issues, including his critique on Google's gender and race quota programs and its dismissal of unpopular (conservative) political viewpoints.

Damore Received Threats from His Coworkers

- After Damore's memo went viral outside Google, Damore began receiving multiple threats and insults from his coworkers.
- On August 3, 2017 George Sadlier ("Sadlier"), a Director at Google, sent out a mass email condemning Damore's memo as "repulsive and intellectually dishonest" and promising an HR investigation by Google into Damore. Sadlier also promoted posts that advocated for physical violence against Damore. Subsequently, on Friday, August 4, 2017, Damore received a late-night email from Alex Hidalgo, a Site Reliability Engineer at Google in Sadlier's organization, which stated, "You're a misogynist and a terrible person. I will keep hounding you until one of us is fired. Fuck you."

-- Forwarded message -----

Date: Fri, Aug 4, 2017 at 10:38 PM Subject: You are a terrible person

To: James Damore <damore@google.com>

Feel free to pass this along to HR. Keep them in the loop for all I care. May as well do it early.

You're a misogynist and a terrible human. I will keep hounding you until one of us is fired. Fuck you.

Alex Hidalgo | Site Reliability Engineer

76. Hidalgo's email was an example of how Google's management team encouraged rank-



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and-file employees to attack other Googlers who expressed political viewpoints outside the Company's very narrow views—including in commentary or feedback solicited by Google.

77. Damore forwarded Hidalgo's email to Google HR, and was told to work from home for some time until emotions cooled down. Similar threats followed from other coworkers. Google executives and employees condemned Damore, his memo, and his views. Some coworkers demanded Damore's termination, and the termination of other individuals who shared his views.



Alon Altman → google.com m

Aug 5, 2017

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One good thing that could come out of the trashfire that is omg/5932 is that several of the people who agree with the document have actively stated their support.

Pretty much all of those Googlers are employed at-will. If Google management cares enough about diversity and inclusion, they should, and I urge them to, send a clear message by not only terminating Mr. Damore, but also severely disciplining or terminating those who have expressed support.

This will send a message that we have zero tolerance for intolerance.

I will also like to take this opportunity to say, if Mr. Damore is not terminated by the end of this month, I plan to turn in my two-week's notice.







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Louis Gray

Imagine being the one woman in an eight person team with him. She deserves a peer bonus for survival.



Google Terminated Damore

- 78. Damore was terminated on Monday, August 7, 2017 at approximately 6:00 p.m., via telephone, as he had been working from home that day, pursuant to Google HR's instruction following the Alex Hidalgo threat of August 4.
- 79. Damore received a call from Rao, who was also joined by Wu. After exchanging pleasantries, Damore informed Rao and Wu that he had filed a complaint that morning with the NLRB, due to Google's prohibition of his engagement in a protected concerted activity (discussing workplace conditions with his coworkers). Rao and Wu did not respond to this point.
- 80. Wu told Damore he was being terminated for "perpetuating gender stereotypes." Rao then stated this was the Google' final decision. When Damore attempted to explain why his termination was unlawful, Rao stated that there would be no discussion. The stated reason for firing Damore was pretextual; Damore was fired because he was a member of a Google-disfavored race, because he was male, and because of his actual or perceived political views.
- 81. During the call when Google terminated Damore, neither Wu nor Rao identified any Google policy or procedure that Damore had violated.
- 82. Upon information and belief, the decision to fire Damore was discussed and approved at the highest levels of Google management, involving not only Sundar Pichai but also the company's founders and senior executives of Alphabet.

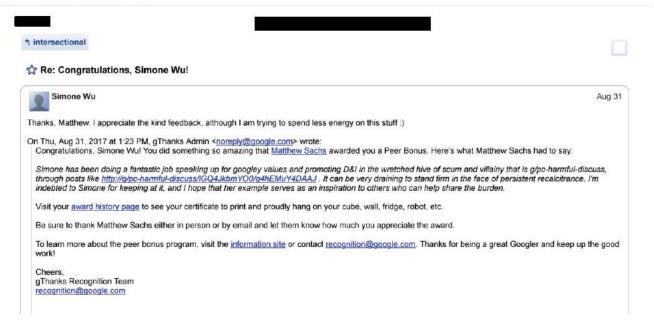
Google Employees Were Awarded Bonuses for Arguing Against Damore's Views

- 83. Not only did Google summarily terminate Damore for his political views relating to workplace issues, but it also rewarded Google employees who disagreed with and disparaged Damore.
- 84. The Google Recognition Team allowed employees to give fellow employees "Peer Bonuses" for arguing against Damore's political viewpoints. Peer Bonuses were typically reserved for outstanding work performance or for going above and beyond an employee's job duties. Defending the leftist agenda, or defending violations of California employment law, is not in any Google employee's official job description.
- 85. In but one example of Google rewarding Damore critics financially, an employee gave a Peer Bonus to another employee, stating that the bonus was for "speaking up for googley values and



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promoting [diversity and inclusion] in the wretched hive of scum and villainy that is [Damore's Memo]." The Google Recognition Team reviewed this justification, considered it appropriate, and allowed the bonus to proceed.



Google Management Admitted to Not Wanting A Safe Space for the Exchange of Political Ideas As Damore Had Hoped

- 86. On August 5, 2017, Colm Buckley ("Buckley"), a high-ranking SRE Director with over 100 employee reports, stated his intention to stifle political dissent within Google in response to Damore's memo.
- 87. Buckley stated that there were certain "alternative views, including different political views" which he did not want people to feel safe sharing at Google. He stated he intended to "silence these views" and that Google employees could "shove them hard up where the sun doesn't shine."

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Colm Buckley → google.com IIII

Aug 5, 3:59 PM

You know, there are certain "alternative views, including different political views" which I do not want people to feel safe to share here. My tolerance ends at my friends' terror.

You can believe that women or minorities are unqualified all you like - I can't stop you - but if you say it out loud, then you deserve what's coming to you.

Yes, this is "silencing". I intend to silence these views; they are violently offensive.

Take your false equivalence and your fake symmetry, and shove them hard up where the sun doesn't shine.





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88. Upon information and belief, Buckley was not reprimanded by Google for his August 5th post.

DAVID GUDEMAN

Gudeman Begins Working at Google

- 89. Gudeman first began working for Google in or around October 8, 2013, until his termination on or around December 5, 2016.
- 90. Gudeman is a conservative, Caucasian male, and was discriminated against and harassed at and by Google as a result. Gudeman was ultimately terminated for these protected characteristics.

The Derail Document

On or about August 20, 2015, Kim Burchett ("Burchett"), an L7¹ SWE Manager, 91. drafted and published a document on a Google-employees-only website, entitled, "Derailing." This

Google engineers are ranked on a scale of L1 to L9, with L9 being the highest level. These levels refer to a specific level of experience and qualification according to Google's internal ranking system.



document discussed how individuals might attempt to silence another's opinions or distract from another's point of view. The document was aimed at Caucasians, a Google-disfavored race, and males, and conflated marginalization with white male privilege. The document essentially claimed through examples that any response but agreement to a statement about bias, prejudice, or privilege was a "derailment." *Reductio ad absurdum*, the thesis of this document is that on this one particular set of topics, the left-wing political frame of systematic bias must always dominate, and the receiver must accept that frame, and its associated worldview, in his or her response.

- 92. Gudeman read this article, and disagreed with its premise, as did many other Google employees. Gudeman left a comment stating his belief that men "need to understand that [Caucasian males] are the victims of a racist and sexist political movement and it is not their fault."
- 93. Gudeman went on to state that "the point of this document is to disallow any defense at all that a man might make when some woman complains about bias. There is no defense. The woman is always right. The man has no alternative but to submit to her superior moral position. We have a word for that attitude, it's called 'sexism.'"
- 94. After Gudeman's comments, others responded stating that he was misinterpreting the document, to which Gudeman responded, "Well if that's the point then you could be clearer, because all I'm getting from this document is that when anyone claims bias, there is no possible defense, not even the defense that the bias did not exist." He then provided a helpful suggestion to assuage any similar concerns other Caucasian men might have, and suggested, "Maybe a section on what a man should do when a woman accuses him of bias in order to protect himself from a system that is highly biased against him."
- 95. Gudeman's comments were not well-received by other supposedly open-minded Googlers. Gudeman even further stated in another comment, "I started out intending to change minds by explaining logically and rationally what is offensive about this document. In response, I was treated dismissively."
- 96. Gudeman compared this document to that which "slave owners would have written for their slaves to help them understand how to interact with their masters," in order to point out prejudices involved with the document.



97.	Burchett, instead of applying the constructive criticism and potentially helping other
employees wh	o felt similarly discriminated against like Gudeman did, stated that she was "[r]esolvin
this comment.	Also escalating to management."

98. Ironically, other Google employees began to "derail" Gudeman's point of view. Under the guise of advocating for an open dialogue, Burchett reported Googlers that disagreed with the thesis of her document, as Gudeman did, to Google management as being "un-Googley." This further exemplifies the one-sided and flawed mindset of Google—that anyone who disagrees with you is wrong and hateful.

Google Punished Gudeman for His Views on Racism and Discrimination

- 99. After being reported to Google, Google HR spoke with Gudeman in or around September 2015 regarding his posts.
- 100. Google HR discussed Gudeman's viewpoints on race and/or gender equality, and his political viewpoints. Google HR chastised him for attempting to stand up for members of races Google disfavored, for males, and for his conservative views.
 - 101. At the end of the Google HR meeting, Gudeman was issued a verbal warning.
- 102. Gudeman complained to his colleagues about the lack of fairness that conservatives received at Google, and the leeway Google provided for leftists to express their thoughts and opinions without repercussions.
- 103. After the 2016 presidential election, many employees at Google became angry, having expected a different outcome fully in line with their political views.
- 104. On November 10, 2016, in response to many Google employee postings on different Google-wide forums regarding their views about the new administration, Gudeman wrote that anyone "who believes President Trump will be out to get minorities, women or gays has absorbed a lot of serious lies from their echo chamber. And the echo chamber is entirely one sided. You can't watch TV or go to movies without being constantly confronted with the leftist world view. Leftists can go their whole life never being exposed to the conservative world view except in shows written by people hostile to it."



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It's ironic how many of the comments support the premise of the question. Anyone who believes President Trump will be out to get minorities, women or gays has absorbed a lot of serious lies from their echo chamber. And the echo chamber is entirely one sided. You can't watch TV or go to movies without being constantly confronted with the leftist world view. Leftists can go their whole life never being exposed to the conservative world view except in shows written by people hostile to it.

David Gudeman Nov 10 2016, 9:57 AM

105. Gudeman also stated in response to another Google employee that "[i]f you truly think Trump is anything like a Nazi or Isis [sic], or wants to hurt gays, women or the disabled, then you are so badly out of touch it borders on delusional. If you don't truly believe those things but are saying them anyway then shame on you for trying to stir up fear and hatred."

Google Terminates Gudeman

- 106. On November 9, 2016, a few days after President Trump was elected as President, Sarmad Gilani ("Gilani"), a Google employee, posted the following message on a Dory thread (an internal forum where Google employees can ask questions that other Google employees can respond to): "As someone already targeted by the FBI (including at work) for being a Muslim, I'm worried for my personal safety and liberty. Will Google take a public stand to defend minorities and use its influence, or just issue the usual politically nuanced statements about our values."
- 107. Gudeman responded skeptically to Gilani's claim that he was targeted solely due to his religion by asking, "In the administration of the most pro-Muslim president in history you were targeted just for being a Muslim? Why didn't you file a civil rights suit? The Justice Department would take your side if it really happened."
- 108. Other Google employees immediately misinterpreted Gudeman's post and responded by stating:
 - a. "'If it really happened'? Come on David, let's give our coworkers the benefit of the doubt here and not suggest they're lying."
 - b. "'Pics or it didn't happen' isn't a very constructive comment here."
 - c. "Reminds me of that 'why you didn't report sexual harassment to the police?' argument. Pfff."



- 109. Gudeman explained that he was not suggesting that Gilani was lying, and affirmatively stated that he "would not suggest [Gilani] was lying without specific knowledge of the case."
- 110. Gudeman further stated that at the suggestion of another Googler, he searched Gilani's story of being profiled, and found "zero evidence for the claim that [Gilani] was targeted just for being a Muslim." Gudeman posed more questions about the FBI's motives for looking into Gilani such as the fact that Gilani had recently visited Pakistan, and that the FBI could have possibly found something interesting about Gilani's trip or the region that he visited.



David, I had to escalate this thread, FYI. It is not ok to create conspiracy theories about your coworkers might be linked to terrorist organizations. You are disrespecting individual rights by generating conspiracy on topics you probably have no context. What's next? Will I be a criminal or linked to terrorist groups for visiting Turkey? Sorry, but my family still lives there to protect your a** from more radical terrorism and acting as a buffer. You are criminalizing everyone who has worked harder in Middle East so you can sleep better tonight.

Jaana Burcu Dogan Nov 10, 12:30 PM

- 111. In response to Gudeman's legitimate questions, a fellow Google employee became hostile and stated that she had to escalate this thread, meaning that she reported it to Google HR.
- 112. Gudeman had another conversation with another Google employee on November 10, 2016, where Gudeman complained about being a conservative and a Trump supporter. Gudeman pointed out that "Trump supporters are a hated and despised minority at Google. Googlers feel comfortable slandering them in a public forum and assume there will be no consequences."
- 113. Gudeman's comment was met with anger and accusations of him "gaslighting" instead of having genuine concerns.
- 114. On or around December 5, 2016, Google HR reached out to Gudeman to discuss his comments, including those surrounding Gilani's post. Google HR stated that Gudeman had accused Gilani of terrorism based on Gilani's religion, and that this was unacceptable. As a result of Gudeman's "accusations," Google stated that he was being terminated.
- 115. Google's purported justification for firing Gudeman is pretextual. Gudeman attempted to simply question the logic behind a co-worker's story of victimization on the basis of his race and religion, but because of his political affiliations, and his status as a white male, Gudeman was retaliated against and fired. Google employees, particularly male members of Google-disfavored races,



were not allowed to question the diversity narrative of the company, even to the point of questioning politically-charged factual assertions by fellow employees in furtherance of their own political agendas.



We don't have a problem with divisiveness. We have a problem with racism – here at Google, and in the population at large.

Tim Chevalier Today, 9:30 AM



Tim, that's easy for you to say when you aren't in the hated and despised minority. Just read the comments on these dory questions. Trump supporters are a hated and despised minority at Google. Googlers feel comfortable slandering them in a public forum and assume there will be no consequences.

David Gudeman 8 minutes ago



David, I'm transsexual. Mike Pence tried to enact legislation to force kids just like me-when-I-was-a-kid to undergo conversion therapy (e.g. electroshock therapy) to make them cis. I have a uterus. Mike Pence put a woman in jail for having a miscarriage. His policies include women being forced to hold funerals for their miscarriages. I have chronic health conditions. Donald Trump wants to make it impossible for me to get health care if I start a business or become a freelancer. Don't you dare gaslight me by telling me that I'm not in a hated and despised minority the week that the voting populace of my country declared war on me.

Tim Chevalier 0 minutes ago

116. These interactions showed that the culture at Google was severe enough that employees such as Gudeman were bullied into silence and required to tolerate harassment without pushing back, yet Google's management refused to consider their concerns to be valid or even worthy of investigation.

POTENTIAL CLASS MEMBERS

Google Punished Other Employees Who Raised Similar Concerns

117. Google employees have witnessed multiple instances in which hundreds of "progressive" Googlers would simultaneously target a single co-worker for harassment, and even potential violence, over a politicized matter, humiliating the person and sabotaging his or her career. In some of these cases, the victim of the targeted harassment campaign was expressing legitimate concerns about discrimination against individuals of Google-disfavored races and males in the workplace as a result of political agitation by social justice activists. As a result of this mistreatment and retaliation, many Google employees have been afraid to come forward publicly. Because of the



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virulent threats against them by fellow Google employees, their names are not being used in the Complaint at this time.

118. In one example, in May 2015, a Google employee brought evidence of harassment and discrimination against other conservatives, males, and Google-disfavored races, to the attention of Google HR. Google HR made excuses for the progressive activists, and waved away the misconduct, thus ensuring nothing was done about the systemic problem. Throughout the summer of 2015, the Google employee discussed the issue with several other concerned employees, who shared the same protected traits. In early August 2015, the Google employee then raised the issue of race and gender discrimination/harassment at Google with Urs Hölzle ("Hölzle"), a Senior Vice President, and one of the first 10 employees at Google. This resulted in a targeted campaign of harassment and threats of blacklisting directed at the Google employee, which Google management did nothing to stop; in fact, several members of management made statements that had the net effect of encouraging "unambiguous social pecking" of political dissidents, and supported Google's harassment.

Look, the only way we're going to solve this is by upecking done by everyone and especially leadersh +Urs Hölzle step up and do this.	and the state of t
→ google.com 🗈	2 hours ago
Urs FOR THE WIN.	
Urs Hölzle I think to ask for a rule book the point. But if you want a succinct summary what you're doing here. Contact me privately it to know more.	don't do
Restricted to google.com • View activity	
Jacob Davies 2 hours ago Urs is good coworker.	

119. On August 14, 2015, a Google employee, and several other employees, raised the sam
issues of gender and racial discrimination with two other Senior Vice Presidents, in an email entitled
"Concerns regarding intimidation and blacklisting." Google's blacklists are discussed in more detail
below.

- 120. On August 19, 2015, in clear retaliation for the Google employee's ongoing attempts to end political discrimination at work, his Google HR Manager and Director issued the employee a Final Written Warning letter. At no point did Google ever retract or repudiate the threats and attacks aimed at the Google employee.
- 121. The warning alleged that the Google employee had violated Google's policy to "create a respectful culture that is free of harassment, intimidation, or unlawful discrimination of any kind." The examples of the comments for which the Google employee was punished included the following:
 - a. "Are you insinuating that it is a 'jerk move' to share your opinion about a political blog post if 98% of Googlers disagree with you, but it's OK to share your opinion about a political blog post if 98% of Googlers agree with you? If so, how do you reconcile this view with Urs' request to help make Google a supportive place for minorities of any kind?"
 - b. Can you point to the industryinfo post in which somebody expressed an opinion in a way that ignored what others think?"
 - c. "Many Googlers have claimed that it is 'harassment' or some other rule violation to critique articles that push the Social Justice political agenda. A few Googlers have openly called for others to be fired over it. Do you support this viewpoint, and if so, can we add a clear statement of banned opinions to the employee handbook so that everybody knows what the ground rules are?"

None of these comments remotely may be described as disorderly, disruptive, derogatory name-calling, abusive or profane, intimidating or coercive (in stark contrast to the hostile postings aimed at conservative, male, and/or Google employees of Google-disfavored races and at others who made a stand against Google's discriminatory treatment of employees in these protected categories).

122. The Final Written Warning itself repudiated Google's own policy: "We strive to



maintain the open culture often associated with startups,² in which everyone is a hands-on contributor and feels comfortable sharing ideas and opinions." Ironically, the Google employee had provided ample evidence that males and members of Google-disfavored races who challenged certain assumptions behind the so-called "social justice" agenda were routinely and unfairly branded as "racists," "sexists," or "bigots," and targeted for severe written abuse and career sabotage.

123. According to Google's policies and procedures, the next step after a Final Written Warning is termination.

Google Failed to Protect Employees from Workplace Harassment Due to Their Support for President Trump

- 124. In October 2016, a Site Reliability Manager at Google became aware that a Google employee was a supporter of President Trump, and held socially conservative views. These two individuals did not work together, but had become acquainted through the company's social mailing lists.
- 125. At a group lunch where the manager was present, the Google employee expressed concerns about Google's intolerance of political minorities, such as conservatives. He stated that employees whose politics closely aligned with the senior management's views were receiving favorable treatment, while political dissidents were unfairly denied promotions. The manager became enraged when he heard this, and stormed off.
- 126. In March 2017, the manager scheduled a surprise meeting with the Google employee's manager in an attempt to sabotage the Google employee's annual performance review.
- 127. The manager falsely accused the Google employee of participating in an illegal "doxxing" campaign to publish an individual's personal information on the internet for the purpose of harassment. The manager also suggested that the Google employee was involved in illegal workplace discrimination, which was absolutely false and unsupported.
- 128. When the Google employee later met with his manager, his manager stated that he was very concerned about the doxxing allegation the manager had made. The Google employee provided

² Google is not a startup. Google operates 70 offices in more than 40 countries and has a market capitalization over \$700 billion.



evidence that the manager's claims were false and concocted, but his name and reputation were already besmirched.

- 129. In March 2017, the manager also posted on a political mailing list visible to all approximately 80,000 Google employees to brag about his meeting with the Google employee's manager for the purposes of harassing and undermining him.
- 130. In this conversation, the manager made additional politically motivated threats directed at members of the "conservatives@" mailing list community at Google. The manager threatened to call in Employee Relations to comb through the mailing list archives to nitpick old postings for possible Code of Conduct violations. Employee Relations at Google is tasked with investigating employees for policy violations, and building a case for discipline. They do not mediate disputes or offer advice.

On Wed, Mar 29, 2017 at 3:25 PM, wrote:

I have received private feedback about the conservatives@ list that contradicts this claim that it is the "least hostile of any political list at Google." To people who do not share their views, this appears absolutely untrue.

In that case, I'm glad I was able to bring my assessment of the situation to your attention.

I know the conservatives@ list has needed to help a few participants in the past find communities better suited to their interests. Out of respect for the privacy of those individuals, I have no intention of mentioning names. What I can share is that the moderators indicated the personally-held beliefs of those participants were not taken into consideration. The primary concern seemed to be ensuring that discussions remained on-topic.

Every mailing list has a right to set its own domain of discourse. I have seen a diverse number of people participate in that particular list. They've openly referred to themselves using many labels. However, during the time they choose to participate in conservatives@, they're usually talking about things relating to conservatism. To me, that seems perfectly understandable.

Tell ya what. How about you and I go to Employee Relations and ask them to take a look at the archives of that list. Then we can provide an official report back to liberty@ with Employee Relations' official stamp of approval saying that conservatives@ is a super welcoming list to those with differing views!

Whaddaya say, ? You with me?

- 131. The manager also threatened to apply Google's stringent, politically intolerant, and legally questionable employee handbook speech code to communications taking place between friends on non-work forums, off the clock. As the manager stated: "Interactions with coworkers outside of work are covered by the same policies as interactions at work. So, for example, current Googlers interacting with other current Googlers on [a private, external mailing list with several current and former employees on it][sic]."
 - 132. The manager's threats were reported to Google HR, and Google HR replied that the



manager had "crossed the line" with his comments. However, Google never made the manager retract his threats or apologize for his sabotage attempts.

- 133. In August 2017, the same manager posted threats of litigation and termination directed against unnamed employees who spoke to outside bloggers in support of Damore and his memo. Once again, Google did nothing.
- 134. In October 2017, it became widely known within Google that a specific Google employee was a supporter of President Trump and a member of the conservatives@ list. In retaliation, Employee Relations conducted a "fishing expedition" and interrogated the employee about political statements that he had made over 12 months prior. The posts in question were no longer visible on Google's internal network, as they had been deleted in early 2017.
- 135. On December 22, 2017, Employee Relations issued the employee a verbal warning for a benign comment about free speech from July 2016, claiming that it violated four different handbook policies. Upon information and belief, Google's handbook is not a single document, but rather a collection of different documents in different places. The employee asked for clarification as to why his posting was in violation, but Employee Relations was not able to offer a cogent explanation.
- 136. Other conservatives at Google have been, and are being subjected to similar fishing tactics aimed at silencing political minorities.
- 137. Conservatives at Google are also subject to name-calling and group shaming.

 Conservative views are distorted and misrepresented. In an internal Google post on January 26, 2018,

 Colm Buckley ("Buckley") referred to conservatives who would whistle-blow on harassing conduct as

 "a cabal of racists, misogynists, white-supremacists, transphobics, anti-Semites and other assorted troglodytes." Upon information and belief, Buckley has not been disciplined for this bullying and gross defamation of numerous fellow co-workers expressing concerns about workplace issues.

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Colm Buckley > google.com		Colm Buckley	Þ	google.com	Bi
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Jan 26, 2018

Just in case anyone's not clear on this matter: a cabal of racists, misogynists, white-supremacists, transphobics, anti-Semites and other assorted troglodytes are engaged in a deliberate campaign to turn the lives of many of their Google co-workers into misery, and to sabotage their careers. They are deliberately using Google's well-intentioned policies of tolerance and inclusivity against us, effectively DOSing our HR departments, and sowing mistrust and fear throughout the company.

I salute Liz, Alon, Colin, Tariq and the others who are quoted in this article, for continuing to have the bravery, and continuing to pay the tax by sparing the time, to speak out.

These are our colleagues, who are engaged in a pretty lonely battle against a threat which has so far not been fully recognized for its evil destructive potential. They deserve our support and our love.

Google's Animosity Toward Trump and Republicans Was Commonplace

138. The atmosphere of hostility toward right-wing ideas permeated Google. As an example of Google's hostility, in January 30, 2017, Alon Altman ("Altman"), a Senior Software Engineer, posted a list of suggestions in response to a town hall meeting where Sundar Pichai and Sergey Brin asked Googlers what they could do to support employees. Altman suggested that Google blacklist right-wing sites such as Breitbart and "[d]elete Donald Trump's and his administration's and his aides' Gmail accounts for abuse." He also suggested Google abuse its power and completely immobilize President Trump's Android phone by turning it into a "brick."

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index.

for abuse.

Any other suggestions?



Alon Altman > Politics III

+Sundar Pichai +Sergey Brin

good, many of these are extreme:

We should never see Google ads on Breitbart. * Take down all "alt right" videos from YouTube.

* Relocate Google I/O 2017 outside the US.

* Brick Donald Trump's Android phone.

Restricted to google.com · View activity

Lee S I would like to see Breitbart removed from the Google News feed as well.

Today at the HOLA town hall, you asked us for things you can do to support us. I

told you that you can make a clear statement on the Google homepage. Here are a few more things you can do using the full economic force for Google for

* Blacklist "alt-right" (aka white supremacist) sites from the Google ad network.

* Remove neo-Nazi sites such as "The Daily Stormer" from the Google search

* Delete Donald Trump's and his administration's and his aides' GMail accounts

139. Google also took efforts to target right-wing outlets and convince its clients to exclude their ads from being placed on "politically right-wing" sites.

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Jan 30, 2017

140.	Google's Large Customer Sales team ("LCS") learned that the Canadian arm of a social
media activis	t group called "Sleeping Giants," which was originally created to urge advertisers to
remove their	ads from Breitbart, shifted its attention to a right-wing outlet called "The Rebel."
Google's Bra	nd Safety XFN Team decided that it would co-opt Sleeping Giants' efforts and email
Google's par	mers and client informing them that companies should reconsider advertising on certain
conservative	websites.

- 141. In its proposed email to Google clients, Marshall Self ("Self"), Director of Agency at Google, stated, "Google believes strongly in the freedom of expression... However, there are many sites and channels who offer polarizing political viewpoints, whose content does not cross our content policy thresholds for hate speech or incitement to violence."
- 142. Then, Self offered a solution to a problem that did not exist yet. In the same email, he stated, "we provide a number of controls, including placement exclusions and filters for political content. Placement exclusions allow you to specify sites, apps, YouTube channels and videos you'd like to remove from your campaigns. Please contact me if you'd like assistance in making changes to your current controls."

Agency xyz Partner:

As you may be aware, a social media activist group calle & leeping Giants has been targeting brands whose ads appear on sites that are identified as politically right-wing or "alt-right" for several months nown the past few weeks, we have seen increasing scrutiny from the Canadian arm of Sleeping Giants towards Canadian companies and Canadian publishers.

Google believes strongly in the freedom of expression, but also recognizes the need to protect the quality of our AdSense and AdX networks for users, advertisers and publishers. Publishers and creators are subject to our content policies, and we take action when the violate these policies. However there are many sites and channels who ofer polarizing political viewpoints, but whose content does not cross our content policy thresholds for hate speech or incitement to violence.

To help advertisers and their agencies align ad placements with the publishers and creators that besuit each brand's specific needs, we provide a wide number of controls, including placement exclusions and filters for political content. Placement exclusions allow you to specify sites, apps, YouTube channels and videos you'd like to remove from your campaigns.

Please contact me if you'd like assistance in making changes to your current controls.

Thanks,

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•	Marshall Self
•	Director, Agency
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Google Even Attempted to Stifle Conservative Parenting Styles

- 143. Google furnishes a large number of internal mailing lists on Google Groups catering to employees with alternative lifestyles, including furries, polygamy, transgenderism, and plurality³, for the purpose of discussing sexual topics. The only lifestyle that seems to not be openly discussed on Google's internal forums is traditional heterosexual monogamy.
- 144. In March 2017, Google HR strongly suggested to a Google employee that conservative and traditional parenting techniques were unwelcome at Google.
- 145. Google HR brought up the following post that the employee made in response to a Google thread in which someone specifically requested conservative parenting advice:

"If I had a child, I would teach him/her traditional gender roles and patriarchy from a very young age. That's the hardest thing to fix later, and our degenerate society constantly pushes the wrong message."

146. Google HR stated, "We did not find that this post, on its face, violated any of Google's policies, but your choice of words could suggest that you were advocating for a system in which men work outside the home and women do not, or that you were advocating for rigid adherence to gender identity at birth. We trust that neither is what you intended to say. We are providing you with this feedback so that you can better understand how some Googlers interpreted your statements, and so that you are better equipped to ensure that Google is a place in which all Googlers are able to reach their full potential." In other words, Google scolded the Google Employee for, among other things, believing that gender identity is set at birth biologically—a position held by the vast majority of the world's populace that Google professes to serve.

³ For instance, an employee who sexually identifies as "a yellow-scaled wingless dragonkin" and "an expansive ornate building" presented a talk entitled "Living as a Plural Being" at an internal company event.



147. These examples were just a few instances of Google bending over backward to support left-leaning views while punishing conservative views in the Google HR context. Google also placed males and members of Google-disfavored races in a lower standing than women and Google-favored minorities when evaluating employee workplace complaints. In May 2017, one Google Employee discovered and reported several offensive postings attacking Trump supporters, males, and Caucasians. In June 2017, Google HR responded: "Thanks for your time the other day and sharing your response. We have reviewed the threads that you sent us and do not find them to be attacking traditionally conservative views, but more extreme, "alt-right" views that seem to teeter into discrimination and possibly incite violence against certain groups of people." Upon information and belief, Google never made any such comments or hair-splitting rationalization regarding posts supporting the violent vigilante organization, Antifa, or other extreme leftist/anarchist organizations. In fact, some Googlers have set their corporate profile pictures to Antifa insignias, as seen in the image below.





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DIC DHILLON LAW GROUP INC.

Google Publicly Endorsed Blacklists

- 148. On or around August 2015, Adam Fletcher ("Fletcher"), an L6 SRE Manager at Google, Jake McGuire ("McGuire"), an L7 SRE Manager at Google, and Nori Heikkinen ("Heikkinen"), an L6 SRE Manager at Google all publicly endorsed blacklisting conservatives and actively preventing them from seeking employment opportunities at Google.
- 149. Fletcher stated in reference to conservatives, who he categorized as "hostile voices," "I will never, ever hire/transfer you onto my team. Ever. I don't care if you are perfect fit or technically excellent or whatever. I will actively not work with you, even to the point where your team or product is impacted by this decision. I'll communicate why to your manager if it comes up."



Adam Fletcher

■ google.com - Aug 4, 2015

While Google appears to be doing very little to quell the hostile voices that exist inside the company, I want those hostile voices to know:

- * I will never, ever hire/transfer you onto my team. Ever. I don't care if you are perfect fit or technically excellent or whatever.
- * I will actively not work with you, even to the point where your team or product is impacted by this decision. I'll communicate why to your manager if it comes up.
- * You're being blacklisted by people at companies outside of Google. You might not have been aware of this, but people know, people talk. There are *always* social consequences.
- 150. McGuire and Heikkinen responded to Fletcher's comment in agreement and came to his defense, needling a Republican employee who raised concerns about the blacklists.



Nori Heikkinen Aug 5, 2015 +2

Well, that was a depressing sequence of threads to catch up on after being 000 for 3 weeks. :/



Aug 7, 2015 +4

+Adam Fletcher This seems pretty... hostile.

You may think it's fine to be hostile to hostility (normally I would agree), but I get the feeling that you're applying this to a bunch of people who aren't actually trying to be hostile at all. Intent matters in cases like this. People with good intentions are teachable. Or at a minimum you can talk to them and find out where you disagree. I promise that the disagreement is not that they like being hostile.



Steven Carstensen Aug 7, 2015 +2

intent actually does not matter in all cases; and individuals can judge when to allow for good faith and when not. Hope that helps!



Jake McGuire Aug 7, 2015 +3

+Adam Fletcher I'm impressed at how calmly and clearly you were able to put this, and agree completely.

Aug 7, 2015

- +Steven Carstensen except in this case people are assuming bad intent and reading something that wasn't actually written because of that false assumption. If you remove intent completely, the statements are completely neutral. And that's how they were actually meant. Instead people are reading things like "there is no problem here... Google is perfect" when no such thing was written (that I'm aware of).
- +Jake McGuire the post is actively and intentionally hostile, not to mention bullying and threatening. No idea how you read it as "calm"



Jake McGuire Aug 7, 2015

you say you aren't trying to be hostile; why do you think the post was directed at you?



Nori Heikkinen Aug 7, 2015

: It's pretty ironic that **+Adam Fletcher** is getting accused of hostility in this context. Think about that one for a minute.



I don't think I explicitly said that I think this post was directed at me. But I'm almost certain that it was directed at people who think like me and that as far as I've seen haven't actually said anything to warrant this type of reaction.



Nori Heikkinen Aug 7, 2015 +4

The people who have said things to merit this reaction are creating a hostile work environment for their coworkers. As a manager, I would also not want anyone on my team who had demonstrated that they are unwilling and/or unable to provide that basic civil environment to their peers. That's what merits this reaction.

151. Google's management-sanctioned blacklists were directed at specific Google employees who tactfully expressed conservative viewpoints in politically-charged debates. In one case, Jay Gengelbach, a L6 SWE Manager, publicly bragged about blacklisting an intern for failing to



change his conservative views.

(The "happy" ending: intern conversion was unsuccessful, due in part to *multiple* people providing unsolicited negative feedback on his packet.)



Matt Beaumont-Gay +13

I was involved in a similar situation four or five years ago. I was not the intern's host — that duty fell to +Chandler Carruth — but I took it upon myself to have the "you have made serious mistakes" conversation after the most egregious incident. I believe that intern is now on our "do not even attempt to hire this person ever" list.

REPLY +1



Matthew Seidl

Since I was there at the lunch where said intern said the things he did - A number of people there at the time did try to esquire as to what he was basing his belief on and give counter examples. They didn't really take. While its possible that with a bunch more work its possible he would have been reachable, across many many lunches he showed no improvement or interest in becoming less self centered. I recall another lunch where he expressed his desire and competence for another job ladder at google, so someone at lunch in that job ladder asked him a few standard interview questions. He failed every one. Did he learn something from this? Nope. He went on to try to interview for this ladder later (at least that was my understanding).

I fully agree that I wish I, Jay, or someone else there would have made a more formal attempt to get this person the help that might have turned them around, I'm not sure we were in a position to really change his opinions.

REPLY +1



Jay Gengelbach +1

+Matthew Seidl yeah, I think part of the problem is that a lot of people responded with "you're wrong and here's why," but not with "you will not work at Google with your current attitude."

Although he did seem awfully intransigent, I don't think he was aware that there were real consequences for his actions. That might have given him the right motivation to change his beliefs—or at least to keep his mouth shut.

REPLY +



Mar 13, 152. Other employees supported that decision, and one even stated to "[t]hrow that bad apple [the conservative intern] away with no regrets."

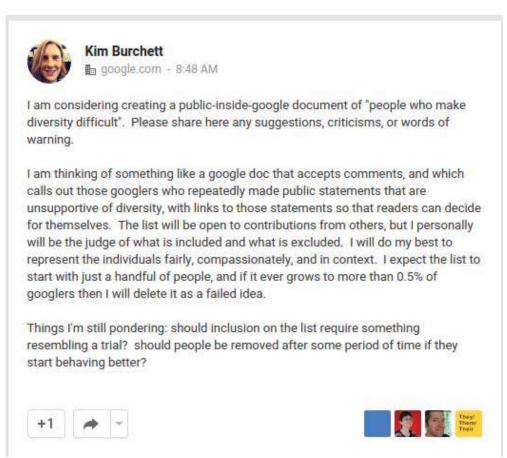


Shoshana Abrass +2

+Jay Gengelbach +Matthew Seidl +John Kochmar

Let me alleviate some of your guilt-in-hindsight. It's very unlikely that logical straight-talk would change the mind of a person who not only holds those beliefs, but is confident enough to voice them openly in a work situation which is more or less an extended interview. In those cases you **should** speak up with your own opinion, but more for the sake of bystanders, and to reaffirm your beliefs (and in this case the company's cultural norms), rather than because you hope to change the speaker's opinion. Throw that bad apple away with no regrets.

153. On an internal Google+ post, Kim Burchett ("Burchett"), a L7 SWE Manager, proposed creating an online companywide blacklist of political conservatives inside Google. She mused aloud to her readership that they *might* deserve "something resembling a trial" before being added to the blacklist.





154. On August 7, 2015, another manager, Collin Winter, posted threats directed at a Goog
employee as a result of raising concerns of harassment and discrimination to Urs Hölzle. Winter
stated: "I keep a written blacklist of people whom I will never allow on or near my team, based on
how they view and treat their coworkers. That blacklist got a little longer today."

- 155. Also on August 7, 2015, another manager, Paul Cowan, reshared Collin Winter's threat to express his agreement with it and to indicate that he had also blacklisted Google employees with perceived conservative views. Cowan stated: "If you express a dunderheaded opinion about religion, about politics, or about 'social justice', it turns out I am allowed to think you're a halfwit... I'm perfectly within my rights to mentally categorize you in my *dickhead* box... Yes, I maintain (mentally, and not (yet) publicly) [a blacklist]. If I had to work with people on this list, I would refuse, and try to get them removed; or I would change teams; or I would quit."
- 156. The primary purpose of these blacklists and suggested blacklists was to encourage and coordinate the sabotage of promotions, performance reviews, and employment opportunities for those with conservative viewpoints.
- 157. On August 14, 2015, a small group of employees submitted a complaint to the Senior Vice President of Google HR, Laszlo Bock ("Bock") and Senior Vice President of Legal David Drummond ("Drummond") regarding the blacklisting of conservatives at Google.
- 158. The group complained that there was an alarming number of individuals calling for summary firings "if they express[ed] certain opinions on sociopolitical subjects." The email further claimed that this type of suppression "stifles debate and prevents the free exchange of ideas from happening."
- 159. The email went on to complain about several individuals who had also openly proclaimed that they kept blacklists of Googlers they refused to work with on the basis of their political views.
- 160. As evidenced by the fact that the blacklisting posts remain live on Google's internal corporate network, it is clear that Google took no action to prevent blacklisting. Google seems to ignore most cases, and occasionally "coach" the worst offenders. However, Google will not openly condemn the practice; instead, it relies on crowdsourced harassment and "pecking" to enforce social



norms (including politics) that it feels it cannot write directly into its policies due, perhaps, to current legal constraints.

Google Provides Internal Tools to Facilitate Blacklisting

- 161. Google's internal company systems allowed employees and managers to maintain a "block list" of other employees with whom they did not wish to interact. For example, if A adds B to her block list, B is not able to look A up in the company directory, communicate with A through the internal instant messaging system, view A's contact information or management chain, or see A's posts on internal social media. A and B would not be able to work together constructively on an engineering project if either person blocked the other.
- 162. It is common knowledge within Google that employees were habitually added to block lists for expressing conservative political views. In these comments, employees and managers discussed using block lists to sabotage other Googlers' job transfers onto their teams.



Stephanie Van Dyk (70k) 2:16 AM +4

I used to have a list written down (it was entitled "Stephanie's Shit List"), but it was hard to keep in sync with my G+ block list. So I deprecated the former and just use the latter.

This is better because when I added something to that list, I would have to look at the other names already on it and that would make me sad. A G+ block list is just a black hole and you only have to look at it if you want to.



Yesterday 4:12 PM

Are such blacklists allowed at Google? I'm not a manager so I don't know what the specific restrictions are for adding people to a team beyond what's taught in interview training.



2:48 AM +1

I would talk to legal before assembling a list of people who are possibly creating a hostile workplace.

And now I know that if I ever sue Google for harassment I should demand to see all manager's shit-lists to see if this was something management already knew and thus let happen (my tormentor could be on there and not dealt with). It would probably increase the settlement award considerably. I would encourage anyone else getting mistreated at Google to do the same.

As a manager you should either deal with the situation or not. Don't write down "I let this happen", which (although IANAL) sounds to me like what a manager shitlist of this kind is.

And if the behaviour is this bad, why aren't you dealing with it? The standard you walk past is the standard you accept.

Is this something you would want to see on the front page of the NYT?





Ade Oshineye 4:41 AM +2

technically we all maintain such lists in the form of the people we have blocked on internal Google+

In my case it's meant that I'm much happier since there are all sorts of people whose existence I've been able to forget.

- 163. When an employee was blocked by a manager in another department in retaliation for reporting misconduct, Google HR defended the practice of blacklisting co-workers, stating: "Thanks for sharing this. Co-workers are allowed to control who can access their social media accounts (like G+ and hangouts). Unless your inability to access John's social media accounts is negatively impacting your ability to do your job, we don't find any information to suggest that John is retaliating against you in violation of policy."
- 164. On a separate occasion, another Googler posted: "Another day, another entry on a blacklist I wish wasn't necessary to keep." This was reported to Google HR. Google HR responded that the employee "was just expressing his own personal opinion on who he likes working with, [therefore] we did not find his comments to violate Google policy."
- 165. At a "TGIF" all-hands meeting on October 26, 2017, an employee directly asked executives about the appropriateness of employees keeping political blacklists. Kent Walker, the Senior Vice President of Legal, dodged the question rather than repudiating the practice of blacklisting.
- 166. On September 8, 2017, a group of conservative employees met with Paul Manwell, Google CEO Sundar Pichai's Chief of Staff, to raise concerns about the ongoing problem of politically motivated blacklisting, bullying, and discrimination at Google. This meeting was a direct response to the company's handling of the Damore situation.
- 167. The conservative employees shared their own experiences with discrimination and asked the management for three major reforms. First, they asked for clarity around communication policies, recommending that Google publish a clearer statement on what is acceptable and unacceptable employee communication, and they recommended that any and all complaints about communication be adjudicated through "a documented, fair, transparent, and appealable process." In



the meeting, the employees pointed out that company leadership was sending mixed messages on whether it was even permissible to criticize diversity policies. Second, the employees requested protection from retaliation, asking the leadership to make a public statement that conservatives and supporters of Damore would not be punished in any way for their political stances. Third, the conservative employees asked the company to make it clear that the hostile language and veiled threats directed at Damore and his supporters were unacceptable, and, they requested that in the interest of making Google a healthier environment for employees of all political stripes, the managers and VPs who made such statements retract the same. On information and belief, none of these reforms ever took place.

168. In or around October 2017, a number of diversity activists at Google indicated that they had met with VPs Danielle Brown and Eileen Naughton in order to ensure that they would be able to continue blacklisting and targeting employees with whom they had political disagreements. On October 22, 2017, a conservative employee asked Google HR to help put him in contact with company leadership to discuss the issue of targeted political harassment. This request was acknowledged by Employee Relations on October 31, 2017. On December 22, 2017, Employee Relations indicated to the employee that they would not be following up on his concerns about the systemic problems he raised, and that they considered the matter closed.

Google Maintains Secret Blacklists of Conservative Authors

- 169. On August 26, 2016, Curtis Yarvin, a well-known conservative blogger who has reportedly advised Steve Bannon, Peter Thiel, and other members of the Trump administration, visited the Google office to have lunch with an employee. This triggered a silent alarm, alerting security personnel to escort him off the premises.
- 170. It was later discovered that other influential conservative personalities, including Alex Jones and Theodore Beale, are also on the same blacklist.

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Summary*	Guest@Google Alert - Possible Unexpected Guest
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Physical Security Ticket Type

Description*

ATTENTION GSOC: An individual with a name matching the Google watchlist is registered in the Guest@Google guest management system: Guest: Curtis Yarvin Host: Visit Date: 2016-08-26 Visit Time: 1:00 pm Location: US-SFO-SPE-4 Address: 345 Spear St., 4th Floor San Francisco CA 94105

Visit ID: 80B2890DE Please follow protocols based on the prescribed actions for this type of guest. Please note this person has a similar name but may not be the actual person on the watchlist.

You received this message because you are subscribed to the Google Groups "Guest Security" group.

To unsubscribe from this group and stop receiving emails from it, send an email to guest-sec+unsubscribe@google.com.

To post to this group, send email to guest-sec@google.com.

On or about September 15, 2016, a Google employee asked Google HR if the writers could be removed from the blacklist. Google HR refused to help with the request, and instead, reconfigured the internal system so that it was no longer possible to see who was on the blacklist.

Google Allowed Employees to Intimidate Conservatives with Threats of Termination

- 172. In the midst of any heated political discussion at Google, it has become commonplace to see calls for conservatives to be fired or "encouraged to work elsewhere" for "cultural fit" reasons. Googlers are extremely proud of the fact that the company has created a "shared culture of shared beliefs" and openly discriminates against job applicants who do not share the same political ideology.
- One Google employee, referring to two conservative Googlers who criticized a feminist 173. blog post in July-August 2015 stated, "maybe we should just try laying off those people. Please."



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Andy Carrel

2:32 PM Aug 4 +

Dear tags, maybe we should just try laying off those people. Please.

Reply



https://memegen.googleplex.com/5004336059908096

2:35 PM Aug 4



Stephanie Van Dyk Interesting confusion over the phrase "laying off". Was Andy calling for the folks on the thread to be fired? Or for other folks to give them a break and stop being so harsh..?

3:03 PM Aug 4



Andy Carrel Yeah, that didn't come across clearly, I was trying to play on the words in tags.

I'll be blunt, I meant there are a select few that I'm fairly certain should just be fired and we would be a better company for it.

This isn't just "a political disagreement." Their judgment about what is going to hurt coworkers is incredibly awful and they are willfully blind to what they are doing wrong with their serial shitposting to wide-audience lists. They are causing more talented people than themselves to leave or want to leave with their bullshit.

3:40 PM Aug 4

2324

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174. Other Google employees also suggested terminating employees with conservative values that did not comport with their own. One even suggested firing an employee twice simply to get the point across—conservatives were not welcome at Google.

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Chris Lewis Sep 2, 2015 +12

Why aren't we firing people? I am not being rhetorical, this is a serious question. We are a company who has worked hard to create a shared culture of shared beliefs. We don't hire people who don't meet those beliefs in interviews. Why aren't we firing people who are creating a toxic workplace?

Can someone enlighten me?

175. Many Google employees resorted to name-calling, and one called conservative Google employees who reported the discrimination they faced to Google HR "poisonous assholes." The employee stated that Google knew who the "assholes" were, and that they could be easily replaced. Several conservative employees reported this to Google HR, but Google HR replied that this hateful rhetoric was not a policy violation.



Chris Lewis

Can we just fire the poisonous assholes already? It's not like we don't know who they are (it's not Mike) and it's not like we can't replace them. We love to dump people out of an interview if they vaguely don't meet "culture fit" but when someone is hired and clearly, publicly and repeatedly act like an asshole, we suddenly can't do anything about it.

REPLY +1



Steven Johnson Sep 2, 2015 +38

After we fire this person, we should rehire them just so we can fire them a second time, for emphasis

Google Fails to Match Funds For Donations from Conservatives

- 176. A cornerstone benefit Google provides to all employees is matching of donations made to any nonprofits up to \$6,000 per employee. However, Google discriminates in its application of this policy by failing to match donations made by conservatives to various conservative organizations, while matching donations to non-conservative causes.
 - 177. Conservatives at Google learned of this when Google failed to match multiple



DIG DHILLON LAW GROUP INC. contributions made to the VDARE Foundation ("VDARE"). VDARE is a nonprofit journal and website focused on the issue of immigration in the United States. It features the writings of Ann Coulter, Pat Buchanan, Michelle Malkin, and many other prominent conservatives.

- 178. From November 2017 to January 2018, at least seven Google employees donated at least \$2,760.00 to VDARE, and requested matching through Google's third-party portal that manages the matching program. However, as reflected in Google's Donations Report, these donations were not matched, even though the donations from the employees were approved. Upon information and belief, Google still deducted the funds from employees' \$6,000 budget for charity matching.
- 179. On or about December 4, 2017, several concerned employees entered a helpdesk ticket to ask why their donations to VDARE were not being matched. Ashley Fraser ("Fraser"), a Product Operations Manager who handles charity escalations, responded that a software glitch was causing the gift match failures and instructed the employees to submit another payment. However, when a software engineer from Fraser's department investigated the issue, he indicated that Fraser's claims were incorrect, and there was no software glitch. Fraser's representation was false.
- 180. On December 13, 2017, Google's Charity Relations team sent an email to VDARE stating that VDARE had denied discriminating against any person or group of people in its employment practices in a questionnaire Google had sent, and "wanted to check that [VDARE] meant to answer this question in this way." VDARE once again stated that it did not discriminate against any person or group in any way.
- 181. Upon information and belief, Google continues to deny all matching payments to VDARE, and has never provided an explanation to the affected employees, thereby denying them an employee compensation benefit on the basis of their political views.
- 182. Meanwhile, on March 1, 2018, a "Defend DACA Phone Bank" was organized across multiple different Google offices, including Google's Palo Alto office and Google's Los Angeles Office.
- 183. On September 5, 2017, in a companywide email to all approximate 80,000 Google employees, CEO Sundar Pichai ("Pichai") encouraged employees to contribute to leftist charities in order to "affirm our support" for the DACA program. Pichai stated that "as a company, we've made

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our support for DACA clear" and provided a link to a website where employees could contribute their own money. This campaign raised over \$150,000 from approximately 500 Google employees. This only further highlights the disparity between Google's attitude and treatment of individuals perceived to be conservatives versus progressives.

Google Enabled Discrimination Against Caucasian Males

- 184. Liz Fong-Jones ("Fong-Jones"), an L5 SRE Manager at Google, repeatedly discriminated against Caucasian males at Google.
- 185. On April 4, 2015, a Caucasian male posted a comment about a "Diversity Town Hall" meeting in which the management stated that affirmative action was impractical from a legal standpoint. Fong-Jones responded that she "could care less about being unfair to white men. You already have all the advantages in the world."

Apr 22, 2015 +17 I agree with the town hall's statement. I've yet to see effective "increasing diversity" efforts which do not bring unfairness against white men (e.g. lowering the hiring bar for minorities, or arranging events where white men are or feel excluded).

Liz Fong-Jones Apr 22, 2015 +179

Frankly, I could care less about being 'unfair' to [edited to add: cisgender, straight, able-bodied, wealthy] white men. You already have all the advantages in the world.

Apr 22, 2015 +9 We will not agree on that.

> Malcolm Rowe Apr 22, 2015 +102 aka Straight White Male: The Lowest Difficulty Setting There Is.

Jonathan Reid Apr 22, 2015 +212

Liz Fong-Jones Apr 22, 2015 +37

The fact that the first comment on this post is a microaggression speaks volumes about the cultural problem at Google.

I understand that we're not going to agree, and you are entitled to your own opinions. However, I wish you'd considered how I might receive the remarks before you made them.



Frank Mayhar Apr 22, 2015 +53

Speaking as a white man, well, I can't say here what I really want to say, which would involve some very NSFW language, so let me just say that you and those like you are not just part of the problem, you're most of the problem. And let me remind you of the adage, "it's better to remain silent and be thought a fool than to speak and remove all doubt."

I wish I could apologize to **+Erica Baker** and all the rest of the women and minorities that this, um, person has insulted but I can't. All I can do is to speak out against this kind of blinkered, pig-ignorant BS and try to fight it as hard as I can. As others have said, if you're a woman and/or a minority and you need an advocate or just someone to talk to, I'm here and am willing to go to bat for you, any time.

186. Dozens of other employees joined the conversation to insult and belittle the Caucasian male, characterizing his concerns about workplace discrimination as, *inter alia*, "stupid goddamn devil's advocate bullshit." This received hundreds of "upvotes" from other Googlers showing their approval.



Colin McMillen Apr 22, 2015 +418

Here's another thing. You are here posting devil's-advocate troll-bullshit along the vague lines of "oh no, some hypothetical white man who is just barely above the hiring bar might be intangibly harmed by some Googlers who decided to give marginally more training or education to non-Googler women."

Meanwhile, we have an established pattern of actual Googler women who have been at the company for years and as far as we know performing admirably in their actual engineering jobs, leaving the company in part because of this stupid goddamn devil's advocate bullshit that shows up every time they talk honestly about their own goddamn experiences at work.

This is why we say "you are part of the problem". You are contributing to a culture that drives out women who are otherwise strong Google contributors, all for *fake internet points*.

187. The Caucasian male employee's own manager replied to chastise him and to promise that he would be punished for his apostasy.



Ilona Gaweda Apr 22, 2015 +183

I'm really sorry for all who got offended by some 's comments. It was flagged to me (I'm source) and HR.

It is not acceptable behavior and I do treat this seriously.

I don't want to extend my comment here before it gets resolved on the official channels. Thanks for understanding.



188. In a follow-up conversation, Fong-Jones doubled-down on her position, stating that the "benefit to everyone as a whole" justifies discrimination against white men.



Liz Fong-Jones Apr 22, 2015 +12

+Helder Batista In the context of a discussion about whether we should engage in work to support people who are not white and/or not men in technology, I think my comment was absolutely reasonable - I feel that if there is any harm to the interests of white men from that work, it is more than made up for by the benefits to everyone as a whole.

- 189. When Fong-Jones was reported to Google HR, Google's initial reaction was to state that since Fong-Jones was responding "to some pretty insensitive comments from other colleagues and reacting to an environment that we know have been less than friendly to women and minorities at times," that her behavior was taken out of context and excused her comments. Google HR then stated that "some empathy could be valuable as you reflect on the conversations."
- 190. It was only after the matter continued to escalate that Google HR finally took "action," which they claimed ranged from "coaching to warnings."
- 191. Chris Busselle ("Busselle"), a Manager in the Search organization, has frequently urged other Googlers to engage in discriminatory practices to improve diversity.
- 192. On April 9, 2017, Busselle posted a message suggesting that employees should leverage Google's influence to have "cheesy white males" removed from speaker lineups at conferences.

Invited to speak externally? Wield your influence for good Next time you get invited to speak at a conference, especially if you're a white male — ask the organizer to confirm you're the only white male on the panel / in the speaker lineup. If not, say you are honored, but must decline, and give the reason. And because you are at Google, guess what — they're going to change the panel for you. You'll feel bad about inconveniencing them. But not that bad. When the cheesy white male executive is in the 'green room' and glaring at you because he was bounced for the panel in favor of a woman on his team, you'll feel pretty damn smug. Or you won't: you'll feel bad that you might have put her in a tough spot, and you'll go above and beyond to make good with the schmucky senior dude. (I know this is nuanced. I know it's a burden to be a woman and have to do these speeches, to be the poster child for diversity in tech. But on balance I'd rather have the conference organizer try, and try harder, than not try at all.)



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193. Busselle's anti-white-male decree was reported to Google HR on April 21, 2017. On May 4, 2017, Google HR replied and said: "Regarding your concern about Chris Busselle's G+ post, we have reviewed and do not find that it violates our policies. You may of course feel free to provide him feedback about his post."

Posts similar to Busselle's "warning" of white males are commonplace at Google, and systemic throughout Google's HR Department—which is the body that is meant to safeguard against discrimination. Amy Ho ("Ho"), Hiring Innovation Manager at Google, posted through internal G+, on May 19, 2017 a section from an article advising that hiring committees at Google should "think long" and hard about whether your department needs another white man" when they see a stellar white male applicant. Ho's selective post from the article continued to state, "You are not hiring a researching robot who will output papers from a dark closet. You are hiring an educator, a role model, a spokesperson, an advisor, a committee person. When you hire a non-marginalized person, you are not just supporting this one applicant whom you like, you are rewarding a person who has been rewarded his whole life. You are justifying the system that makes his application look so good." (Emphasis in the original.)



Amy Ho → google.com III

May 19, 2017



Interesting opinion piece on #inclusion (in academia but can apply in other settings too)

"If you are on a hiring committee, and you are looking at applicants and you see a stellar white male applicant, think long and hard about whether your department needs another white man. You are not hiring a researching robot who will output papers from a dark closet. You are hiring an educator, a role model, a spokesperson, an advisor, a committee person. When you hire a nonmarginalized person, you are not just supporting this one applicant whom you like, you are rewarding a person who has been rewarded his whole life. You are justifying the system that makes his application look so good."

"When the applications come in, remember society makes dominant applicants look better than they are. Society makes marginalized applicants look worse than they are. There is no objectivity. There is no meritocracy. Fight for justice. Fight even yourself."



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Google Openly Discriminated Against Men with Its "Girl Power" Project

195. In or around 2011, Google created "Girl Power" whose objective was to staff more females in senior positions throughout Google.

196. According to a one-page advertisement Girl Power released praising its successes, Girl Power boasted that it had "double the number of senior women hires" in just 12 months. The advertisement also included an instructional video which the advertisement stated explained how Girl Power was able to accomplish this feat.



Home Join us on G+

Got Girl Power?

in 2011 the NACE Global Business Organization staffing team realised there were not enough senior women in Large Company Sales (LCS) in the NACE region.

So, they did something about it.

In just 12 months, the team doubled the number of senior women hires. How did they do It?

Watch the video to find out.



How to get involved

If you are interested in replicating Girl Power in your office, please connect with others in your location to create a project team and nominate one representative from your office to join the monthly hangouts—join our G+community to join the conversation. These monthly meetings will help your team connect with the Girl Power team and learn about best practices.

Follow us on G+ at go/gotgirlpower.

What you can do today

- Interview at least one woman for your open role
- 2. Have at least one woman on the interview panel
- 3. Spend one hour each week sourcing for diverse talent, be it women or other underrepresented groups





Search this site

- 197. The Girl Power video suggested that Google recruiters should "book just one day a week where [the employee] spend[s] one hour sourcing for female candidates," and that Google recruiters should advertise open positions in "magazines that women are likely to read."
- 198. The Girl Power video also stated that recruiters should "try to ensure that every single role that you have, you have at least one women represented at [the] interview stage."
- 199. Similar to Damore's memo, the Girl Power video employed statistics to justify its position. However, unlike Damore's memo, it failed to provide any scientific research to support them. The Girl Power video stated that "having a senior woman in the business can reduce your chances of folding by 20% and increase your return on equity by 46%," thus providing the "business case" for employing more women instead of men.
- 200. The video ended with the Google employees laughing that "once we resolve the girl issue, then there are loads of other issues that we can focus on."

Google Failed to Recognize Its Own Hypocrisy

201. An official policy at Google, drafted by Clayton Robbins ("Robbins"), a Diversity Business Partner in Google HR, is the "Inclusive Perf for Managers - Handout" (the "Handout"). This document is provided to all managers as part of their "Inclusive Perf" training at Google, which is required by some departments at Google and strongly encouraged by others. According to Google, the purpose of the training and Handout is to describe methods that race and gender bias can creep into performance management, and methods of preventing this from happening—similar to the goals of Damore's memo.

Inclusive Perf for Managers - Handout [go/inclusiveperf-handout]

A postwork study guide for managers who completed Inclusive Perf for Managers Training.

Around the globe, women are underrepresented† in the tech industry. In most places in the world, people of color are also underrepresented in tech. Globally, men and whites are especially overrepresented‡ in tech management and leadership roles.

Representation patterns like these could increase the impact of race/gender biases on our performance management efforts as managers, and these biases are more likely to show up in spaces where there are exaggerated patterns of some race/gender groups being overrepresented, and others underrepresented, like we have in our industry.

202. The Handout used for training its managers begins by stereotyping and listing "aspects



of white dominant culture, commonly centered in corporations, and most spaces in the U.S." It then provides a list of traits and aspects "valued by U.S. white/male dominant culture," which included "arguing, winning," "short-term payoffs," "giving feedback indirectly (about you, but without you)," "individual achievement," "meritocracy," and "colorblind racial frame." The Handout also includes a list of traits and aspects commonly devalued in white culture, such as "listening," "growth in quality," "valuing self-determination," and "noticing race/color and any racial patterns in treatment."

Rewarding people when they exhibit values and practices that are part of the dominant culture, and either punishing or failing to reward people when they exhibit values that are outside of the dominant cultural norm. Below are aspects of white dominant culture, commonly centered in corporations, and most spaces in the U.S.:

Valued by U.S. white/male dominant culture	Commonly invisibilized or devalued by U.S. white/male dominant culture
Front of the room, persuasive Arguing, winning Either/Or Perfectionism Urgency Numbers driven Growth in number, size Protecting' others from Short-term payoffs Avoiding conflict Giving feedback indirectly (about you, but without you) Individual achievement Seeing us as unique/exceptional We are objective Casual, informal, off-the-cuff Meritocracy Colorblind racial frame	Listening, raises up multiple voices Identifying multiple viable paths Both/And Everything's a work in progress Sustainability Narrative driven (quotes, qualitative) Growth in quality Valuing self-determination Seven generations thinking Conflict is productive/necessary Giving feedback directly (with you) Collective achievement Seeking connections between contexts Everything is subjective Formal, prepared, thought out Holding systems accountable for equitable outcomes Noticing race/color and any racial patterns in treatment

- 203. The Handout then goes on to discuss stereotypes "ascribed to women and people of color," stereotypes ascribed to "Black/Latinx people and Black men in particular," and explains how Google managers can give feedback to "women and people of color" as opposed to giving feedback to males and Caucasians.
- 204. Similar to Damore's memo, the Handout cites to multiple different studies and articles on gender and race biases and stereotypes to justify the positions set forth by the Handout. However, unlike Damore, Robbins was never reprimanded for promoting harmful racial and gender stereotypes of Google-disfavored races and males. Rather, this program became part of Google's indoctrination of its management staff.



Google Failed to Treat Men and Women the Same

205. On November 15, 2015, a Google employee complained to Google HR regarding a highly offensive post from an employee in the Developer Product Group. The post stated:

"If you put a group of **40-something white men** in a room together and tell them to come up with something creative or innovative, they'll come back and tell you how enjoyable the process was, and how they want to do it again, but they come up with fuck-all as a result!" (Emphasis added.)

- 206. The Google employee stated that this statement was a violation of the Google Code of Conduct, and was creating a hostile workplace environment as it targeted members of Google-disfavored races, males, and individuals over the age of 40.
- 207. Google HR responded: "Given the context of the post and that [the employee's] main point is to highlight that it is helpful to have diverse perspectives, it doesn't appear that the post to [sic] violates our policies."
- 208. Perplexed, the Google employee responded to Google HR by replacing the term "40-something white men" with "women" and asked how that was not a breach of conduct. Google failed to respond.

Hi Josh,

Thanks for your reply. If I understand the policy correctly, then, would it be acceptable for somebody to post a sentiment along these lines?

"If you put a group of women in a room together and tell them to come up with something creative or innovative, they'll come back and tell you how enjoyable the process was, and how they want to do it again, but they come up with fuck-all as a result!"

Assuming, of course, that the main point is to highlight that it is helpful to have diverse perspectives.

[Quoted text hidden]

209. Google's lack of response and engagement evidenced Google's biases and its inability



to even recognize them when someone pointed them out. As demonstrated above, Google allowed individuals to insult and discriminate against political conservatives, members of Google-disfavored races, and males with impunity.

A perfect example of Google's relaxed attitude toward discrimination against members of Google-disfavored races and males is seen in Burchett's G+ posts. As seen below, Burchett states that in the promotions committee which she serves on, where she helps decide which T5 Engineers are promoted to the T6 level, she stated, "2/4 committee members were women. Yay! 4/4 committee members were white. Boo! 12/15 candidates were white men. Boo!" Further in the thread, Burchett highlights the divisiveness of her original post by noting that it was not fair even to talk about women when "POC" or "people of color" weren't getting enough airtime in the discussion.



Kim Burchett

google.com - Oct 7, 2015

In the T5->T6 promo committee I served on, 2/4 committee members were women. Yay! 4/4 committee members were white. Boo! 12/15 candidates were white men. Boo!













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Nina Kang Yesterday 6:46 AM

Can you share what % of packets were women?



Kim Burchett Yesterday 8:30 AM +3

+Nina Kang I could, but since google already focuses an awful lot on women to the exclusion of poc, I'd kind of rather not.



Nina Kang Yesterday 8:33 AM +2 Understood. Respect.



Avery Pennarun Yesterday 12:05 PM +1

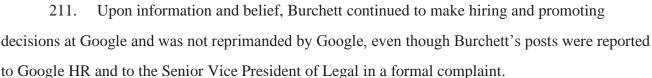
Whereas on the committee I was on:

0/4 committee members were women

0/4 packets were women

and I'm not very good at telling which people are white or not.





212. These examples make it clear that 1) Google discriminates against conservatives, members of Google-disfavored races, and males and 2) that Google has fostered an environment where this kind of mistreatment is not only allowed, commonplace, and accepted—but is, in fact, encouraged, enabled, and rewarded.

Google's "Diversity" Policies Impede Internal Mobility and New Hires

- 213. Another former Google employee, who first began working for Google over a decade ago as a Software Engineer has suffered similar discrimination, harassment, and retaliation for his perceived conservative views, his gender, and his Caucasian race.
- 214. From 2008 till 2016, the Google employee was able to move from one team to another with ease after a project was cancelled or completed, and during this eight-year time period, he transferred between approximately five different teams.
- 215. Although the Google employee moved from team to team at Google, the Google employee consistently received at least "Meets Expectations" after his promotion in 2008 until 2015, with one "Needs Improvement" rating in 2015—a month after taking bereavement leave to mourn the death of his grandmother.
- 216. When the Google employee learned that a project he was working on was moving to another country, he began looking for a new team to join as he had done numerous times in the past. However, this time, it was much more difficult.
- 217. The Google employee reached out to more than 10 different hiring managers, but few seemed interested in having him join their team, and only one had extended a firm offer by the end of January 2017.
- 218. Upon information and belief, the Google employee was not selected due to the fact that the hiring managers were looking solely for "diverse" individuals, and as a Caucasian male, the Google employee did not help fill their mandatory (and illegal) quotas. The Google employee was otherwise completely qualified for the positions for which he applied. This discrimination was



confirmed a few days later when on February 2, 2017, the Google employee's former director initiated a "Diversity Team Kickoff" with the intent to freeze headcount so that teams could find "diversity candidates" to help fill the empty roles. Google was specifically looking for women and non-Caucasian/Asian individuals to fill these roles.

- 219. In a further display of disregard for the law, Charles Mendis ("Mendis"), an Engineering Director at Google, informed his team that he was "freezing [headcount]" so that he could reserve future open positions for diverse candidates. Mendis stated, "For each position we have open work on getting multiple candidates including a diversity candidate." He then went on to state, "Often the first qualified candidate is not a diversity candidate, waiting to have a few qualified candidates and being patient is important."
- 220. This discrimination against members of Google-disfavored races and males was not only allowed at Google, but was supported and actively encouraged.
- 221. Facing the threat of termination unless he met a looming March 2017 transfer deadline imposed by Google HR, the Google employee was finally able to secure a position with a team in the Ads and Commerce Product Area.
- 222. The team was a new area for the Google employee, but his supervisor praised his work and his ability to learn the new field so quickly. On or around April 2017, a few months after he started working with his new team, the Google employee's reviewing manager stated in a written performance review, "[The Google employee] has ramped up fast on ML, a new area for him," and his manager further told the Google employee that he was on track to receive either an "Exceeds" or "Strongly Exceeds Expectations" rating in the next performance cycle.
- 223. The Google employee was further told during his weekly one-on-one meetings with his manager in July 2017 that he was doing fine work. The Google employee's manager had no complaints or issues to discuss with him.
- 224. Although the Google employee was coming along nicely in his new team, he did not feel that it was a good fit due to the lack of coding involved and was frustrated with the pace of bureaucracy on the team. Therefore, the Google employee reached out to Stephen Gillet ("Gillet") of



the Google X team, whom he had previously corresponded with back when the Google employee was leaving one of his previous teams.

- 225. Gillet was receptive to the idea of re-engaging with the Google employee for the purposes of transferring him over, and connected him to a few other members of the team, including Will Robinson ("Robinson"), the hiring manager of Google X.
- 226. While the Google employee was in the middle of discussing the transfer, Damore's memo began going viral. On August 4, 2017, the Google employee commented in support of Damore's memo and its defense of the conservative ideology, and stated:

"Thank you for raising this important issue James. All too often I believe this subject is portrayed very one-sidedly here at Google, and with real consequences for those who dare to question the dominant narrative."

The Google employee then went on vacation after that until approximately August 15, 2017.

227. While the Google employee was out of the office, his director sent an organization-wide email encouraging all employees to attend "Ads Diversity and Inclusion Week", while simultaneously condemning Damore's memo, stating that "misogyny and racism are not 'political views."

Diversity and Inclusion and "the doc"

Mike Schulman Reply-To: To: cen-all <cen-all@google.com>

Mon, Aug 7, 2017 at 5:20 PM

Hi

I actually drafted this email out last week around encouraging folks to come take part in the <u>Ads Diversity and Inclusion</u> <u>Week</u> coming up in 7 days! I still plan to encourage participation so hold tight. That said a lot has happened between last Friday and today.

To jump right in, I've read the document and have personally found the premise repulsive and the arguments intellectually dishonest. I feel it propagates harmful and invalid stereotypes and advances a misunderstanding on how Google or any technology company operates.

I very much want a workplace where all people feel safe and can be successful. This includes political views, and Google has room to improve in this area, but I refuse to accept that misogyny and racism are "political views". Events like Ads_Diversity and Inclusion Week are important opportunities for us as a team to stand up for what is important to us. I will be taking part and encourage all of you too as well.

As always please reach out to me, your manager, or your HRBP.

thanks... mike



	228.	On or around September 6, 2017, less than one week before managers began meeting to		
determi	ine cali	bration ratings, the Google employee suddenly and suspiciously received verbal		
feedback from his manager that he was in danger of not meeting expectations. On the next day,				
Robinson emailed the Google employee that the "[next] (and near-final) step in the process on our sid				
would t	oe a cha	at with your current manager. This is a normal piece of due diligence that I do for all		
transfer	s, and i	it's usually the last step before we make a formal transfer offer."		

- 229. On September 12, 2017, the Google employee informed his reviewing manager of his desire to join the Google X team. His reviewing manager claimed to be supportive of the transfer, even offering to expedite it to ensure it would go through before performance reviews are finalized.
- 230. On September 19, 2017, during the weekly one-on-one meetings, his reviewing manager began discussing the Google employee's future with the team, and told the Google employee that he needed to deliver a sizeable project in the final quarter of the year with "no room for failure." The Google employee understood this statement to mean that his performance review and his transfer were now in jeopardy.
- 231. A few days later, on September 22, 2017, the Google employee received an email from Robinson titled "Bad News." The email went on to state that "[a]fter a lot of thought and discussion, I've come to the conclusion that the right fit isn't there for you and our team at this time."
- 232. Robinson's sudden and cryptic turnaround, along with the Google employee's reviewing manager's negative verbal feedback, just a few weeks after the Google employee's comment of support in Damore's memo, made it clear that the transfer was subverted by the Google employee's management chain at Google due to his political views.
- 233. On or about October 12, 2017, the Google employee confronted his reviewing manager during their one-on-one meeting about his call with Robinson, but his reviewing manager naturally denied any wrongdoing and stated that he only "had a 15-minute conversation regarding [the Google employee's] strengths and weaknesses."
- 234. On or about October 25, 2017, two weeks after that weekly meeting, the Google employee received a "Needs Improvement" rating. This occurred despite the fact that his reviewing manager had been assuring the Google employee every week since September 19, 2017, that he had



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been meeting expectations. The Google employee also argued that the rating was unfair because he only learned of his alleged "poor performance" on September 6, 2017.

- 235. Because this "Needs Improvement" rating was his second one (during his ten-year tenure at Google), the Google employee was also automatically placed on a Performance Improvement Plan ("PIP"). This was the first time the Google employee had received any written feedback since joining his new team that his performance was in need of improvement.
- 236. The Google employee had worked at Google for nearly a decade without incident, and as soon as Googlers learned he supported conservative ideologies, he lost his transfer to a different team, received a poor performance rating, and was placed on a PIP. The employee ultimately left Google as a result of this orchestrated harassment.

Google Literally Defines "Diverse Candidates" as Blacks, Hispanics, Veterans, PWDs, and Women And Maintains Quotas

- 237. On May 3, 2016, Gina Coons ("Coons"), Global Marketing Staffing Lead at Google, who manages a group of approximately 16 Google recruiters, sent an email entitled "[Please read] New Monthly Global Staffing Meeting details." In this email, which was sent to the entire Global Staffing team, Coons forwarded an email from Michael Moran ("Moran"), a recruiter at Google, dated April 28, 2016. In Moran's email, Moran described two programs at Google: Center Stage and Supplemental Headcount.
- 238. The Center Stage Program was a new project at Google that aimed to "feature exceptional marketing talent to Leadership in an effort to better socialize profiles across the business and find candidates a suitable home." Moran stated in his email that this project places an "[e]mphasis on diversity (80% of talent featured should be diverse)."

Center Stage (go/centerstagemhc)

A new project that aims to feature exceptional marketing talent to Leadership in an effort to better socialize profiles across the business and find candidates a suitable home.

- Emphasis on diversity (80% of talent featured should be diverse)
- Eligibility: Screened by Staffing AND the business
 - At least 1 Hangout interview with the business
 - Preferably a slate of onsites completed
 - Feedback is all Good for Google/Good for Marketing
- · Presented at MHC as new candidates added
- Submit candidates for consideration via go/centerstageshare
 - · Submit by end of Thursday for consideration at following Monday's committee



239. The Supplemental Headcount Program was "a last-ditch strategy for getting diverse talent into Google when all other avenues have been exhausted." Moran went on to state "POps has a handful of HC reserved exclusively for diverse HC. Diverse candidates are: Black, Hispanic, veterans, PWD, and L4+ women." Upon information and belief, "PWD" stands for "People with Disabilities."

Supplemental Headcount Program (go/supplementalhcoverview)

Supplemental Headcount allocation is a last-ditch strategy for getting diverse talent into Google when all other avenues have been exhausted. POps has a handful of HC reserved exclusively for diverse HC. Diverse candidates are: Black, Hispanic, veterans, PWD, and L4+ women.

- · Read up on the protocol for pursuing candidates here. Lots of legal jargon, but imperative that the process is followed closely.
- Most likely cases to get approval:
 - Offer/Candidate "revival"
 - No HC in location
 - No HC at candidate level
- · Requirements: Approval from HRBP; Approval from Supplemental HC program (GVC meeting with recruiter, HRBP, HM, and SHC rep)
- HC will be transferred to business cost center once candidate accepts offer



240. Notably, Caucasians, Asians, and males are left out of Google's definition, and are thus being eliminated for consideration for certain categories of job openings at Google.

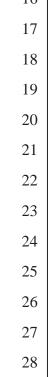
Google Treats "Diverse Candidates" Differently Than Caucasians, Asians, and/or Males

241. Upon information and belief, Google's subsidiary, YouTube, implemented policies at Google's direction that discriminated against Caucasians, Asians, and males for the sake of increasing diversity. Google and its subsidiaries gave preferential hiring treatment to "diverse candidates" at the

expense of candidates who happened to be male or identified as a Google-disfavored race.

242. Terry O'Connor ("O'Connor"), Staffing Leader & Leadership Recruiting at Google, sent her entire recruiting team an email on December 8, 2015, stating that they had "successfully [hired] all of [their] T3 2016 YT New Grads," and that recruiters should "not schedule any interviews for T3 SWE [software engineering] candidates going forward." She ended the email by congratulating her team "on meeting the YT New Grad hiring targets," and said that it was "time to focus on L4+, diversity and iOS." O'Connor's email showed that they had filled all the open positions and that there was no longer a need to hire additional employees.





1	Terry OConnor				
Ħ	Hi team,				
	This is an important follow up from our team meeting yesterday re New Grad/T3 hiring.				
	Since we've successfully hired all of our T3 2016 YT New Grads, please do not schedule any interviews for T3 SWEs candidates going forward. Also do not send T3 SWE candidates to the YTBAhiringmanager alias				
	I'd like to meet with each of you this week to review your T3 candidates currently on the allocation trix and in your queue. Please add time to calendar asap.				
	Awesome job on meeting the YT New Grad hiring targets - time to focus on L4+, diversity and iOS.				
	Thanks so much!				

- 243. Antonio Caminong ("Caminong"), a Technical Recruiter at Google, responded to this email and asked if this halt in hiring applied to "diverse" T3 software engineers.
- 244. O'Connor responded to Caminong stating "great question please review all T3 candidates with me." O'Connor stated this even through there were allegedly no open spots available or open at Google as her team had meet their "hiring targets."
- 245. O'Connor's response shows that Google maintained special procedures for its "racially favored" candidates—benefits which were not afforded to males or Caucasians/Asians. Upon information and belief, Google considered and hired multiple "diverse" candidates after O'Connor's email in an effort to boost its diversity statistics implicitly, refusing to consider candidates that were male or members of Google-disfavored races for those job openings.
- 246. Upon information and belief, Google tracked the race and gender of the applicants and used these protected categories to determine who it hired to the detriment of males and members of Google-disfavored races.
- 247. Upon information and belief, Google attempted to conceal its illegal discrimination by asking its employees to delete emails and any other references to its hiring quotas or preferences for "diverse" candidates. Google managers would also hold internal meetings explicitly stating the quotas that were being set for new hires, and would ask recruiters to focus on hiring females and non-Caucasian/Asian candidates. These quotas were referred to as "goals," "benchmarks," and "OKRs." Google managers asked that this strategy of increasing diversity be kept secret, and these "goals" were typically communicated orally to internal recruiters at in-person meetings.
- 248. Upon information and belief, Google employs internal recruiters whose sole responsibility was to hire only "diverse" candidates. These recruiters were explicitly instructed not to



hire males, or candidates who were Caucasian or Asian. They were also told to recruit only at colleges and universities that were historically known for having smaller populations of men, Caucasians, and Asians.



3/25/16

+chrome-diversity-council@

On Fri, Mar 25, 2016 at 12:16 PM, Rachel Blum I like these, although I _really_ like this one: O

wrote: e component of this will likely be for geo to commit to taking a certain percentage of our new hires from recruiting pipelines that manage to find strong candidates with more varied backgrounds. Which means that there are recruiting pipelines that find from a more varied background. Why doesn't ours? (I'm not seeing much of the non-LAX pipeline so _maybe_ it's a localized problem. Although hiring suggests that, well, our pipeline

Google Disguised its Hiring Quotas as OKRs

- 249. Upon information and belief, in or around 2017, Google released an internal powerpoint deck of a "Diversity Scorecard" that looked at its diversity statistics in Q1 2017. In this deck, Google laid out its "Objective and Key Results" ("OKRs"). OKRs is a process used by Google for setting, communicating, and monitoring quarterly goals and results.
- Google stated that overall, women represented 16% of its SWE workforce, black Googlers compromised 0.9% of its SWE workforce, and Hispanics compromised 2.8% of its SWE workforce. Google's OKRs were that the SWE population distribution reaches or exceeds the available candidate pool with respect to diversity by O1 2018, and that there be 23% women, 5% Black+, and 4% Hispanics/Latino+ in the workforce.
- 251. After the Q1 2017 diversity OKRs were released, Gayathri Rajan ("Rajan"), Vice President of Product Management at Google, sent an email on March 6, 2017, on behalf of the Geo Diversity Council at stating that "we have specific goals around ensuring that the Geo SWE population distribution exceeds the available candidate pool with respect for diversity. Geo managers will be provided hiring training and will be asked to participate in extensive outreach to colleges with diverse candidate pools." Rajan continued to state that every Geo manager "must have a plan for their team's career development" with a "pipeline that [was] vetted for representativeness." Rajan stated that her team would "also launch the Geo Guides Mentorship Program and expand the Women@Geo Mentorship Program to continue making progress on career development."
- 252. The OKRs that Google set and that Google Management promoted, were actually quotas that Google managers were ordered to fill. Google managers are constantly pressured to use



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applicants' race and gender as hiring factors, and are explicitly told (warned) that failure to meet the quotas could result in adverse career consequences for managers.

253. Plaintiffs and class members may point to innumerable other examples of illegal and discriminatory conduct at Google. For the sake of relative brevity, only a handful of examples have been described in this First Amended Complaint. Attached as **Exhibit B** to the First Amended Complaint is a compilation of posts and "memes" from Google's internal message boards designed for employee use. All approximately 80,000 Google employees have access to an internal meme generator site that is described as "a space for sharing internal news, announcements, passive-aggressive statements, awesomeness, witty remarks, Reddit OC and cynical-in-a-good-way experiences on Google and outside." Employees often use the memegen tool to post offhand comments and observations for others to see; there is a voting mechanism that puts the most popular entries on the top of the page. Other entries on Exhibit B are from widespread Google internal communications available to employees.

GOOGLE DISCRIMINATES AGAINST JOB APPLICANTS

- 254. As amply supported by the allegations set forth in this First Amended Complaint, Google has adopted a pattern and practice of disparately and adversely treating similarly situated job applicants because of the applicants' race, sex, and political affiliations and activities. Google and its management fetishize "diversity" as measured by these protected characteristics only, and mandate that the percentage of non-Caucasian/Asian, non-male, and non-conservatives employed by Google increase rapidly over time. In so doing, Google assigns negative value to applications submitted by persons perceived to be members of Google-disfavored races, male, and/or conservative, by virtue of the applicant's protected traits, affiliations, or activities. Google favors for employment applicants lacking those traits, affiliations, or activities and instructs or permits hiring personnel to evaluate job applicants on the basis of these protected traits, affiliations, and activities.
- 255. Google's hiring practices, including the ample discretion afforded to hiring personnel in determining whether a prospective employee is a "cultural fit" within Google, in conjunction with Google's widely-known toleration and approval of hostility, bullying, and discrimination against employees deemed to be members of Google-disfavored races, also render it more likely that a non-

NT.C

Caucasian/Asian, non-male, or non-conservative applicant will be hired over similarly situated Caucasian/Asian, male, conservative applicants for any given position. Thus, in the alternative, Google's hiring practices negatively and disparately impact job applicants, including Amador, McPherson, and Burns, who are, or are perceived to be, members of Google-disfavored races, male, and/or conservative. Individuals from these categories are disproportionately less likely to be hired by Google as a causal result of Google's illegal hiring practices.

256. The stories of Plaintiffs Amador, McPherson, and Burns, who were refused employment by Google as a result of invidious discrimination, are described below.

MANUEL AMADOR

Amador Joins Google as a Systems Engineer

- 257. Amador is an accomplished software and reliability engineer, and has worked for several prominent tech companies in the United States and abroad, including Google, Cloud.com, Twilio, Inc., StumbleUpon, and Aditazz. He earned a bachelor's degree in information management and software engineering from the Universidad Santa Maria in Chile.
- 258. Amador is male, a trait evident from his appearance and name, and is known to be male by Google.
- 259. On or around September 2013, Amador began work at Google's San Francisco, California headquarters as a site reliability engineer. Then on or around October 5, 2015, Amador transferred to Google's Switzerland office, where he continued to work as a systems engineer. Amador was an exemplary employee, and met or exceeded all of Google's expectations.
- 260. The same cannot be said for Google. During his time at Google, Amador experienced the same intolerance of conservative viewpoints, or any viewpoint that did not support the narrow set of ideologies tolerated at Google, as identified by Damore and Gudeman. Often, this intolerance would result in Amador being wrongly accused of being intolerant himself, simply because Amador dared to challenge the views expressed by his colleagues. Such intolerant and harassing behavior was often motivated by discrimination against Amador, on the basis of his real or perceived viewpoints and/or gender, and racism toward Google-disfavored races.

- 261. Despite being faced with such hostility, Amador continued to voice his opinions, in direct defiance of those at Google that seek to silence and expel all opposing viewpoints.
- 262. The culture of intolerance, however, eventually became too much for Amador to bear. In or around June 2016, Amador was called to a meeting with Google HR as a result of someone falsely accusing Amador of believing that people have differing levels of intelligence based on that person's race. Amador has never thought that, does not believe it to be true, and has never written or spoken as if he believed it to be true. This false complaint was filed by an anonymous complainant as means to stifle Amador's political activities and conversations at Google, was done to harass Amador on the basis of his race and/or gender, and resulted in Amador receiving a letter from Google reprimanding Amador.
- asked that Amador issue an apology. At that point, Amador felt compelled to leave Google as a result of the hostile work environment created by, and left unchecked at, Google. To stay at Google brought with it an unacceptably high risk that Amador's personal and professional reputation would be permanently tarnished by those at Google bent on suppressing and expelling those who hold viewpoints different from their own, Google-disfavored races, and/or males. By demanding that Amador apologize over a falsified complaint, Google sent a clear message that it would allow and enable such hostile, retaliatory, and oppressive conduct to occur unchecked.

Amador Voluntarily Departs Google and Releases an Open Letter

- 264. As a result of these hostile workplace conditions, Amador voluntarily left his job at Google on or around July 27, 2016. In his written notice of resignation to Google's Adam Iwanicki and Brian Kennan, Amador stated that though he profoundly appreciated his involvement on his team, "the way in which [Amador] ha[s] been repeatedly treated by other members of the company (including H.R.) in response to [Amador] speaking up on a variety of subjects, ranging from political events to workplace conditions, ha[s] made [Amador's] stay at Google too stressful...."
- 265. Amador also released an open letter in which Amador said "goodbye" to Google and identified his reasons for leaving. Specifically, Amador wrote that "Google employs a few individuals (from rank-and-file to upper management) who are or have become highly ideological. They have



made it one of their ostensible missions to have the entire company conform to these ideologies. Most of them believe that all of us – me and many others included – should not be permitted to impugn or question the ideologies they want to impose."

266. Amador's letter further elaborates on the politically-charged monoculture that is hostile to certain viewpoints, including conservatism and libertarianism: "many people (including me) have faced contempt, opprobrium, insults, smears, provocations, threats of industry blacklisting, and even frivolous H.R. reports that influence my career (and many others'), in retaliation for voicing my mind. The tone of this treatment was always particularly intense whenever I dared to question the set of ideologies that I found incorrect, toxic or divisive. I have been slurred as a racist, a sexist and 'privileged,' in direct contradiction to the content of my thoughts...I have been directly ordered by senior management to 'stop posting immediately' on a thread where I had managed to give other Googlers the impression that it was okay to discuss a common myth about free speech." As a result of this hostility, Amador was forced to leave Google. A copy of Amador's open letter is attached here as **Exhibit C**.

267. After his departure, Amador received a written letter from Google, signed by Manuel Chiatello, from Google's Human Resources Management, and Adam Iwanicki, Google's Site Reliability Manager, recommending to any prospective employer that Amador be hired. The letter identifies what Google believed to be several of Amador's strengths as an employee, including his ability to "integrate into the different types of activities he was involved in," "good planning capabilities and sound judgment," "good organizational skills," his ability to cope with "high volumes of work," and that "Manuel was friendly, open and tactful with superiors and colleagues. His personal behavior was respectable. He was a reliable colleague. The quality of his work met our requirements."

268. Thereafter, Amador was hired by another tech company in Switzerland.

Google Refuses to Re-Hire Amador Due to His Protected Status and His Political Activities

269. After a period of time, Amador decided to return to Google. While Amador found Google's culture of intolerance disappointing, he also felt that he should not let Google and a portion of its most vocal employees drive his career decisions, and that his presence at Google might aid in the



creation of a more diverse and open workplace, free of discrimination, retaliation, and threats made against those that express viewpoints that are currently not tolerated at Google.

- 270. It is Google's custom and practice to rehire former employees who voluntarily left their jobs at Google, pursuant to simplified, streamlined rehiring procedures. For example, a former employee wishing to return to his recently vacated position needs only to contact that employee's former supervisor, request to be rehired, and if the position is available, the employee will be rehired without any formal interview process.
- 271. Accordingly, Amador understood and reasonably believed that he could and would be rehired for the same or substantially similar role as his former position at Google. A former colleague, friend, and current Google employee (referred hereinafter as "Amador's friend"), also referred and recommended to Google that Amador be rehired as a systems engineer, a position Amador is amply qualified for, including because he performed identical or substantially similar work for Google for approximately three years and he had met all expectations during that time.
- 272. In or around April 2017, Amador applied for the position of systems engineer at three of Google's offices, including Mountain View, California.
- 273. On April 18, 2017, Google recruiter Taylor Rosser ("Rosser") emailed Amador, informing him that, despite another Google employee referring him for the position, after "carefully reviewing [Amador's] background and experience," Google would not be proceeding with Amador's application.
- 274. That same day, Amador responded to Rosser's email, reminding Rosser that Amador performed the same or substantially similar job functions as a systems engineer for Google for the previous three years, and during that time he always met Google's expectations. Amador also stated that he has 18 years' work experience in the industry, and that several people would submit recommendations on his behalf, including former teammates, if required. Amador also asked Rosser if she had any suggestions for what other Google positions he should apply for.
- 275. On April 19, 2017, Rosser responded by email, stating that "I was able to share your profile with the individual hiring teams for each of these roles and they chose to pass, stating that they currently have stronger candidates already in progress. I'm unable to suggest any specific roles that



you might be a fit for, but the google.com/career page has a variety of options available for you to apply to."

- 276. Amador responded by email, asking for further information as to the level of experience of the current candidates being considered and why Rosser was unable to suggest a few positions for which Amador could apply. Rosser refused to respond substantively to Amador's concerns, and evaded his follow-up questions.
- 277. Disturbed by Google's refusal to rehire him for the same or similar role as he had previously held, which was contrary to Google's usual practice of rehiring former employees, Amador asked Amador's friend if he knew why this might be the case. Amador's friend then approached the Google recruiter, Rosser, to discuss why Amador's application had been rejected. Rosser stated to Amador's friend that all other candidates for the systems engineer positions were more qualified than Amador. This reason given by Rosser was false and pretextual.
- 278. Unconvinced that this was the reason, Amador's friend inquired further and discovered that other applicants had been, at most, designated as an "L3." Amador, however, was an "L4" during his employment with Google, indicating that Amador was more qualified and/or experienced than the all other applicants, according to Google's own internal standards.
- 279. Amador's friend then informed Rosser that Amador was a "L4" when Amador left Google, and that it did not make sense that Google would hire an "L3," someone of lesser experience than Amador, in Amador's place. Rosser again acted evasively, avoided answering Amador's friend's questions and ultimately refused to provide any cognizable answer as to why Amador's application had been rejected.
- 280. Amador's friend later informed Amador that he believed Google had blacklisted Amador from employment at Google.
- 281. Accordingly, Amador is informed and believes, and thereupon alleges, that Google blacklisted him from employment at Google, as a result of his real or perceived political viewpoints, activities, and affiliations, and as a result of his being male, which is, unfortunately, consistent with Google's unlawful employment practices.



- 282. Despite his ample experience and qualifications, including his several years of working at Google in the same or similar role as the position Amador applied for, which he did to Google's express satisfaction, Google categorically refuses to rehire Amador.
- 283. Despite rejecting Amador's application, the positions for which Amador applied remained open at the time his applications were rejected, and Google continued to seek applicants from persons of Amador's qualifications.
- 284. In accordance with its unlawful and discriminatory patterns, practices, and policies, Google refused to rehire Amador on the basis of his actual or perceived political affiliation and activities, and his gender. Indeed, as discussed herein, the pattern and practice of refusing to hire candidates because of these protected traits or activities is pervasive throughout Google.
- 285. Amador's application for employment was also rejected by Google as a direct result of Google's hiring practices that disparately impact actual or perceived, members of Google-disfavored races and/or males. Google permits all hiring personnel a wide degree of discretion in assessing and refusing to hire persons that are not considered to be a "cultural fit" within Google, while simultaneously demanding a more diversified workforce and that all employees are, or become, complicit in Google's discriminatory hostility toward Caucasian/Asian, conservative men, and toward all those that disagree with Google's approach to achieving diversity in the workforce.

STEPHEN MCPHERSON

- 286. McPherson is a lawyer, consultant, commercial-rated pilot, and a former U.S. Navy pilot with over a decade of proven leadership experience. McPherson earned a Bachelor of Arts in History from Walla Walla University, in Washington, before earning a juris doctorate from University of Idaho College of Law, followed by a Master's degree in National Security Policy from the United States Naval War College, in Newport, Rhode Island.
- 287. McPherson is a member of the Republican Party. From August 1996 to August 1998, McPherson served as a congressional staffer for U.S. Representative George R. Nethercutt Jr., a Republican congressman for the 5th Congressional District in the State of Washington. As a result of this work, McPherson's conservative political background is readily identifiable, including because his



prior employment for a Representative Nethercutt constitutes a part of McPherson's employment history and is identified as such on his resume.

- 288. After attending law school, McPherson worked as a litigator in Washington State for approximately three years. Then in 2003, McPherson enlisted in the U.S. Navy, where he was trained as a Navy pilot, and was deployed to the Persian Gulf, the Horn of Africa, and South America between 2005 and 2008, where he piloted Seahawk helicopters.
- 289. McPherson then served as a pilot instructor for the Navy in Jacksonville, Florida for several years, before being transferred to Naples, Italy, where he served as a Commanding Officer's Lead Project Manager, during which time he managed the finances of an \$11-million U.S. military program. From 2013 to 2016, McPherson was stationed in San Diego, California, where he continued to serve in the U.S. Navy as a Senior Manager for the Aviation Training Department with the Littoral Combat Ship Squadron. After leaving the Navy in 2016, McPherson worked as a consultant for the firm Booz Allen Hamilton. He is currently employed as a civil servant for the U.S. Federal Government as a Real Estate Contracting Officer, and is temporarily residing in Naples, Italy, in conjunction with that employment.
 - 290. McPherson is a white male. Both of these traits are visibly apparent from his person.

McPherson Applies for a Job at Google

- 291. During his decade-long service with the U.S. Navy, McPherson witnessed or learned from at least two other Navy pilots that Google had offered each a job through Google's veterans placement program.
- 292. In 2016, while stationed in San Diego, California, McPherson transitioned out of the Navy, and applied for a project manager position with the Google Fiber project. While the position may have required McPherson to relocate to Texas, Google considered, interviewed, and ultimately rejected McPherson's application in its headquarters in Mountain View, California.
- 293. McPherson met all qualifications for the project manager position listed by Google. Based on McPherson's ample qualifications and extensive leadership experience, he was a strong candidate for the position. Moreover, a former Navy pilot and current Google employee, Manolo Strange ("Strange"), referred McPherson to Google as a prospective employee.



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294.	In March 2016,	McPherson	submitted hi	s application	materials a	and was	thereafter
contacted for i	nitial telephone	interviews in	n March 2016	ó.			

- 295. In April 2016, evidently impressed by McPherson, Google paid to have McPherson flown up to Mountain View, California on or around April 26, 2016 for a series of in-person interviews that took place at Google's headquarters. This day-long interview process involved approximately five in-person interviews, as well as a more casual interview over lunch, which was intended, in part, to allow McPherson an opportunity to converse informally with another Googler on the Fiber team, and to ask questions.
- 296. Following his day-long interview process, Renee Doyle ("Doyle"), a Google's HR employee contacted McPherson and began discussing information related to his prospective salary, including his most recent salary, bonus, and stock options. Another Google HR employee, Carmen Simpson, emailed McPherson on May 24, 2016, stating, "Hi Stephen are you prepared to move to San Antonio if I can get you an offer?" To which, McPherson responded in the affirmative. On June 1, 2016, Doyle contacted McPherson by email again, asking McPherson to let her know of any competing offer details.
- 297. McPherson understood these exchanges to indicate Google was highly likely to offer him the job.
- 298. Google also requested that McPherson interview with "John," a member of the Google Fiber team in Austin, Texas. The interview occurred over the phone on or around May 26, 2016.

Google Refuses to Hire McPherson

Due to His Protected Statuses and His Political Activities

- 299. Despite his ample qualifications, and experience, and the apparent interest by Google, on or around June 10, 2016, Google informed McPherson that he was no longer being considered for the project manager position. Specifically, Google's staffing employee, Carmen Simpson, informed McPherson that Google requires unanimity in their hiring decisions, and that Google was unable to reach unanimity with McPherson's application.
- 300. McPherson then contacted Strange, the former pilot who had referred him to Google, and asked his advice on how to proceed. Strange stated to McPherson that what he experienced,

namely, being interviewed and proceeding almost to the point of an offer letter, "rarely happens," but that "once the decision is made they don't reverse it." Strange then suggested that McPherson reapply in one year's time.

- 301. Despite rejecting McPherson's application, the position for which McPherson applied remained open at the time his application was rejected, and Google continued to seek applicants from persons of McPherson's qualifications.
- 302. In accordance with its unlawful and discriminatory patterns, practices, and policies, Google refused to hire McPherson on the basis of his political affiliation and activities, gender, and Google-disfavored race. Indeed, as discussed herein, the pattern and practice of refusing to hire candidates because of these protected traits or activities is pervasive throughout Google.
- 303. McPherson's application for employment was also rejected by Google as a direct result of Google's hiring practices that disparately impact actual or perceived, members of Google-disfavored races and/or males. Google permits all hiring personnel a wide degree of discretion in assessing and refusing to hire individuals who are not considered to be a "cultural fit" within Google, while simultaneously demanding a more diversified workforce and that all employees are, or become, complicit in Google's discriminatory hostility toward white, conservative men, and toward all those who disagree with Google's approach to achieving diversity in the workforce.

MICHAEL BURNS

- 304. Burns is an accomplished copywriter, marketer, consultant, and entrepreneur. He is also a conservative, white male.
- 305. For years, Burns has worked, directly and indirectly, for a variety of well-established technology companies, including AOL, Microsoft, Visa, Hewlett Packard, Advanced Micro Devices, and Dell, and he has since worked as a contractor, for several companies as a senior copywriter, content strategist, and digital marketing strategies, including for GrokrLabs, Inc., Walmart Global eCommerce, Tata Communications, and Symantec. He has also worked as a brand content and a marketing program manager at several tech companies, including Ixia and Cisco.
- 306. In his spare time, Burns publishes or shares material on social media platforms that are conservative or libertarian in nature, and/or that are likely to be perceived as conservative, including



on Twitter and on his LinkedIn profile. At the time of his application, the posts and comments made on these platforms were accessible to the general public and/or to all persons with a Twitter or LinkedIn account.

- 307. For example, Burns follows conservative and libertarian groups and individuals, such as the Cato Institute, Reason Foundation, Heartland Institute, Independent Women's Forum, and the Heritage Foundation all of which advocate political positions that fall outside the narrow political ideologies tolerated by Google. Burns follows and/or shares posts made by these entities as a means of engaging in political discussion on topical issues with others on social media.
- 308. As might be expected from an entrepreneur and marketing specialist, Burns includes a hyperlink to his LinkedIn profile at the base of his signature block for every email he sends. This allows interested persons, or companies, to more easily view his experiences, qualifications, and recommendations from those that have used his services or have worked with Burns in the past.

Burns Applies for a Job at Google

- 309. Between October 23, 2015 and October 13, 2017, commensurate with his interests, qualifications, and experience, Burns applied for numerous content, marketing, communications, and copywriter positions with Google. Burns was not hired by Google for any of these positions.
- 310. On June 5, 2017, Burns applied for the position described by Google as "Copywriter, Cloud Web Experience Lab Sunnyvale." The position was based in Google's Sunnyvale facilities.
- 311. Burns' extensive experience in marketing, content strategy, and copywriting satisfied all qualifications specified in the job description posted by Google.
- 312. On or around June 26, 2017, Burns received an invitation from Google's Creative Recruiter, Lindsey McQueeney ("McQueeney"), for an initial interview with McQueeney "to discuss [Burns'] status and career interests." Burns promptly responded and discussed his interests with McQueeney over the phone.
- 313. On or around July 5, 2017, Google's Staffing Services Associate for Recruiting, Salma Arabie ("Arabie"), contacted Burns for a follow-up screening interview, to be conducted over the phone with a person identified as "Goldy."



- 314. On July 18, 2017, Burns completed the screening interview with Goldy successfully, and Google then asked Burns to participate in additional follow-up interviews over the phone with Google's Cloud Web Experiences team in Sunnyvale.
- 315. On July 25, 2017, Burns was contacted by Katie Papadonis ("Papadonis"), a Google Recruiter, who provided additional information about Google Cloud Marketing to Burns. Papadonis then proceeded to arrange for further interviews.
- 316. On August 2, 2017, Burns was interviewed by Google's Managing Director, Online, Google Cloud, Greg Petroff ("Petroff"). Petroff would have been Burns' supervisor had he received a job offer from Google. During the interview, Burns answered all questions asked of him satisfactorily, and illustrated his ample qualifications and experience for the position.
- 317. Immediately following the interview with Petroff, Burns emailed McQueeney and Arabie thanking them for arranging the interview with Petroff, and stating his continued interest in meeting the rest of the team at Sunnyvale. Burns also disclosed that he was moving to a last round conversation with another company for a contractor position, and that he was still open to being considered for employment at Google regardless.

Google Refuses to Hire Burns

Due to His Protected Statuses and His Political Activities

318. On August 9, 2017, approximately one week after his interview with Petroff, Burns shared an article on Twitter (originating on LinkedIn), titled "What to Learn from Google's Missing Leadership on the Diversity Memo," written by New York University adjunct professor, Joshua Spodek.





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	319.	The article defended Damore's right to speak his mind, rebuffed Google CEO Sundar
Pichai ³	's firing	of Damore, and offered suggestions for how Pichai could have better handled the
situatio	on.	

- 320. Burns shared the article because he felt it contributed a unique political perspective as to the heated political discussions about Damore and his controversial memo, which was counter to the prevailing dismissive and derisive attitude exhibited by some members of the public and the press toward Damore.
- 321. This post was shared by Burns on his publicly viewable Twitter account, which shares the same profile name as Burns' LinkedIn account. Burns also shares other posts, and comments on other people's posts, in a manner that might lead others to believe that Burns identifies politically as a conservative. As a link to Burns' LinkedIn account is contained at the base of each of Burns' emails to Google, those Google employees in a position to make the hiring decision as to Burns' application for employment had immediate access to review and consider Burns' social media posts, including those posts that are conservative-leaning, such as the article that defended Damore and was critical of Google's unlawful practices. On information and belief, Google did precisely this.
- 322. Burns is also a Caucasian male, which is evident from his name and the picture or pictures of Burns visible on Burns' Twitter and LinkedIn profile pages.
- 323. Despite his ample experience and qualifications, and interviewing for the position, Burns was not offered the copywriter position or any subsequent role as a content strategist with Google. Indeed, Burns later responded to Google's request for contractors on LinkedIn, but was denied any contractor position with Google, establishing that Burns is being categorically denied a position at Google.
- 324. Despite rejecting Burns' application, the position for which Burns applied remained open at the time his application was rejected, and Google continued to seek applicants from persons of Burns' qualifications.
- 325. In accordance with its unlawful and discriminatory patterns, practices, and policies, Google refused to hire Burns on the basis of his political affiliation and activities, gender, and race. Indeed, as discussed above, the pattern and practice of refusing to hire candidates because of these

protected traits or activities is pervasive throughout Google. Unfortunately, Burns, like Amador and McPherson, fell victim to Google's unlawful devices.

326. Burns' application for employment was also rejected by Google as a direct result of Google's hiring practices that disparately impact actual or perceived, members of a Google-disfavored races and/or males. Google permits all hiring personnel a wide degree of discretion in assessing and refusing to hire persons that are not considered to be a "cultural fit" within Google, while simultaneously demanding a more diversified workforce and that all employees are, or become, complicit in Google's discriminatory hostility toward white, conservative men, and toward all those that disagree with Google's approach to achieving diversity in the workforce.

AFTER THE INITIAL COMPLAINT

Google's Discrimination Worsened after Its Illegal Practices Were Described Publicly

- 327. After Damore filed his initial Complaint on January 8, 2018, instead of reviewing and revising its discriminatory practices, Google increased its efforts to hunt down and punish conservative speech. Specifically, Google began monitoring the "conservatives@" list in an attempt to locate conservatives, interrogate them about their posts and views, and give them pretextual warnings and reprimands, supposedly to create the justification for a near-future termination.
- 328. Conservative employees began receiving warning for posts they had written and deleted up to two years ago. For example, one Google employee, who was a member of the "conservatives@" list at Google, was dragged into a meeting, without warning, in early 2018, to discuss a post that he had written in mid-2017—approximately six months prior. After interrogating and accusing the employee of specious and vague policy infractions, Google decided there was no policy violation. Upon information and belief, these actions were taken because of the employee's political beliefs and activities.
- 329. On March 26, 2018, Employee Relations scheduled a surprise meeting with a conservative employee to interrogate him about the use of a personal laptop to check his email—something that is explicitly allowed under Google's polices, and is extremely commonplace among engineers. Upon information and belief, these actions were taken because of the employee's political beliefs and activities.



Republicans.

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January 12, 2018, 8:09 AM PST

Having a political viewpoint is fine as long it is really just an intellectual discussion. With politics, people who express conservative views, actually end up *voting* republican - which has massively negative effects on a large number of people's lives. If you happen to be one of those people or even know some of those people, or you know, actually have any basic "respect" for those people, it is rather hard to just shrug off someone's republican viewpoint as just a difference in opinion.

On March 1, 2018, another conservative Google employee from the "conservatives@"

For example, Rahul Chaturvedi ("Chaturvedi"), an L6 software engineering manager in

list received a warning from his manager for a posting from March 2016. This posting was so old that

it had been automatically deleted from Google's email systems, but someone had apparently located or

Managers continue to discriminate against conservatives, and, in fact, the

discrimination has worsened and became more apparent. Google managers explicitly began making

the Chrome OS division with seven direct reports, stated in an internal Google memegen comments

republican – which has massively negative effects on a large number of people's lives." Chaturvedi

went on to state that if you happen to be an individual who votes Republican, "it is rather hard to just

section that "[w]ith politics, people who express conservative views, actually end up *voting*

shrug off someone's republican viewpoint as just a difference of opinion."

negative remarks about conservatives and made clear attempts to tell employees not to vote for

saved a copy for the purpose of harassing this conservative employee. Upon information and belief,

these actions were taken because of the employee's political beliefs and activities.



Google Couched Whistleblowing as Harassment In an Attempt to Silence Conservatives

333. Since Damore filed his complaint against Google, employees have been anonymously sharing evidence of alleged harassment, retaliation, intimidation, and misconduct directed at



conservative employees of the company, in a clearly protected attempt to whistle-blow on alleged and perceived unlawful conduct.

- Google has aggressively attempted to recast the whistleblowers as "doxers" and "harassers," although it provided no evidence to support these claims.
- 335. Hölzle wrote on an internal Google post that he hoped to "identify" those responsible for the "reprehensible conduct." Hölzle hoped to retaliate against the whistleblowers.



Urs Hölzle → google.com III

Jan 27, 2018



Sometimes, like yesterday, I am...saddened? taken aback? disgusted? by the thought that there are Googlers coming to work filled with hate towards their colleagues. I'm not even sure what adjective to use....but it's sad. No matter the topic, there's just no room for hate at Google.

But then again, I remind myself that 99.99% of our colleagues do not fall into that group, and that we can't let a small fraction of employees dominate our thoughts, feelings, and culture. That makes me hopeful that we can overcome the attempts to create a culture of hate and fear.

But that is little comfort to the Googlers who are being doxxed or harrassed. I hope we will identify those behind this reprehensible conduct. All Googlers are responsible for upholding a workplace and culture that is free of harassment, discrimination, misconduct, bullying, and retaliation.



336. Google is deliberately attempting to conflate conservative whistleblowers engaging in a protected employment activity by bringing attention to unlawful work practices within Google, with inappropriate harassing activity such as "doxing."



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337. discriminatory environment conservatives are complaining about. The apparent intent of Hölzle's threat is to intimidate employees from exercising their lawful right to report Google's severe and pervasive workplace problems.

CLASS ACTION ALLEGATIONS

Hölzle, a senior official in Google, is leading this charge and is helping create the

338. Plaintiffs bring their first, second, third, fourth, tenth, eleventh, and twelfth causes of action pursuant to California Code of Civil Procedure § 382 on behalf of themselves and on behalf of the following proposed Class, which all Plaintiffs are members of, and Subclasses:

Class: All employees and job applicants of Google, who were discriminated against by Google, in California, due to their perceived conservative viewpoints/activities, their race, and/or their gender at any time during the time period beginning four years prior to the filing of the initial complaint on January 8, 2018 through the date of trial in this action ("Class").

Political Subclass: All employees and job applicants of Google who identified themselves as having conservative viewpoints through their words, actions, and/or conduct, who were discriminated against by Google due to their perceived conservative viewpoints and/or activities, in California, at any time during the time period beginning four years prior to the filing of the initial complaint on January 8, 2018 through the date of trial in this action ("Political Subclass").

Gender Subclass: All employees and job applicants of Google discriminated against by Google in California for being males at any time during the time period beginning one year prior to the filing of the initial complaint on January 8, 2018 through the date of trial in this action ("Gender Subclass").

Race Subclass: All employees and job applicants of Google discriminated against by Google in California for being Caucasian or Asian at any time during the time period beginning one year prior to the filing of the initial complaint on January 8, 2018 through the date of trial in this action ("Race Subclass").

Hostile Work Environment Subclass: All members of the Gender Subclass and Race Subclass employed by Google at any time during the time period beginning one year prior to the filing of the initial complaint on January 8, 2018 through the date of trial in this action ("Hostile Work Environment Subclass") (Political Subclass, Gender Subclass, Race Subclass, and Hostile Work Environment Subclass, collectively referred to as "Subclasses"). 4

Plaintiffs Damore and Gudeman are members and representatives of the Class and all Subclasses; Plaintiff Amador is a member and representative of the Class and Political and Gender Subclasses;



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Plaintiffs reserve the right to amend the definitions of Class and Subclasses following discovery.

- 339. Excluded from the Class and Subclasses is anyone employed by counsel in this action, and any judge to whom this action is assigned and his or her immediate family members.
- 340. This action is brought, and may properly be maintained, as a class action under Code of Civil Procedure § 382, because each Class and Subclass is a well-defined community of interest in the litigation, and each proposed Class and Subclass is easily ascertainable. There also exists a sufficiently numerous classes or subclasses, and substantial benefits from certification that render proceeding as Classes or Subclasses, superior to joinder, filing individually, or other alternatives.
- 341. Numerosity and Ascertainability: The size of the Class and Subclasses makes a class action both necessary and efficient. Upon information and belief, Google employs approximately 30,000 employees located across California, and an estimated one to two million job applicants apply to Google each year. Members of the Class and Subclasses are ascertainable through Google's records, but are so numerous that joinder of all individual Class and Subclass members would be impractical.
- 342. Predominant Common Questions of Law and Fact: Common questions of law and fact affecting the rights of all Class and Subclass members predominate over individualized issues. These common questions include, but are not limited to:
 - a. whether Google has a systemic policy and/or practice of discriminating against employees and job applicants due to their perceived conservative political views and activities;
 - b. whether Google has a systemic policy and/or practice of discriminating against employees and job applicants due to their gender;
 - c. whether Google has a systemic policy and/or practice of discriminating against employees and job applicants due to their race;
 - d. whether Google's systemic policy and/or practice of discriminating against employees and job applicants due to their perceived conservative political views and activities

Plaintiff McPherson is a member and representative of the Class and Political Subclass; Plaintiff Burns is a member and representative of the Class and Political, Gender, and Race Subclasses.



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- e. whether Google's systemic policy and/or practice of discriminating against employees and job applicants due to their gender violates the Fair Employment and Housing Act;
- f. whether Google's systemic policy and/or practice of discriminating against employees and job applicants due to their race violates the Fair Employment and Housing Act;
- g. whether Google's systemic policy and/or practice of discriminating against employees and job applicants due to their perceived conservative political views and activities was willful;
- h. whether Google's systemic policy and/or practice of discriminating against employees and job applicants due to their gender was willful;
- i. whether Google's systemic policy and/or practice of discriminating against employees and job applicants due to their race was willful;
- j. whether Google established a hostile work environment or was aware of the same and failed to take corrective action;
- k. whether Google's policies or practices violate Cal. Bus. & Prof. Code § 17200 et seq.;
- 1. whether equitable remedies, injunctive relief, damages, and/or attorneys' fees for the Class and/or Subclasses are warranted.
- 343. Typicality: Plaintiffs' claims are typical of the claims of the Class and Subclasses as a whole because Plaintiffs are employees or job applicants of Google in California during the respective Class Periods, who were discriminated against for their perceived conservative views, their gender, and/or their race.
- 344. Adequacy of Representation: Plaintiffs will fairly and adequately represent the interests of the Class and Subclasses because their individual interests are consistent with, and not opposed to, the interests of the Class and Subclasses, and because Plaintiffs have selected counsel who have the requisite resources and ability to prosecute this case as a class action and are experienced labor and employment attorneys who have successfully litigated other cases involving similar issues and have litigated class actions.
 - 345. Superiority of Class Mechanism: Class certification is appropriate because common



questions of law and fact predominate over any questions affecting only individual Class Members. Google's liability in this case is based on uniform company policies and procedures. The amount owed to each individual Class Member is small in relation to the expense and burden of individual litigation to recover that amount. The prosecution of separate actions against Google by individual Class Members could create a risk of inconsistent or varying adjudications which could establish incompatible standards of conduct for Google. A class action is superior to other available methods for the fair and efficient adjudication of the controversy set forth herein.

LEGAL CLAIMS

FIRST CAUSE OF ACTION

Violation of Cal. Labor Code § 1101

(By All Plaintiffs on behalf of themselves and the Political Subclass Against Google)

- 346. Plaintiffs repeat and incorporate each paragraph above as if fully set forth here.
- 347. Employers may not refuse to hire, discharge, or discriminate against an employee for engaging in political activities or the exercise of any rights afforded him. California Labor Code § 1101 prohibits employers from making, adopting, or enforcing any rule, regulation, or policy that forbids or controls, or tends to control, their employees' political activities.
- 348. California Labor Code § 1105 states, "Nothing in this chapter shall prevent the injured employee from recovering damages from his employer for injury suffered through a violation of this chapter."
- 349. Upon violation of this section preventing employers from controlling political activities of employees, employees have a right of action for damages for breach of an employment contract.

 Lockheed Aircraft Corp. v. Superior Court of Los Angeles County (1946) 28 Cal.2d 481.
- 350. Plaintiffs, and all members in the Political Subclass, engaged in protected political activity. Plaintiffs, and the Political Subclass members, expressed their political viewpoints, and as a result were discriminated against throughout the respective Class Periods by Google.
- 351. As a direct result of the aforesaid violations of law, as well as the job retaliation set forth herein, Plaintiffs and Political Subclass have sustained, and will continue to sustain for a period



of time in the future, damages in an amount according to proof at the trial of this action.

- 352. As a direct and proximate result of Google's willful, knowing and intentional retaliation, Plaintiffs have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 353. These actions of Google were so cold, callous, and reckless as to be malicious. Plaintiffs and the Political Subclass are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 354. Plaintiffs and the Class and Subclasses pray for attorneys' fees and expenses pursuant to Code of Civil Procedure § 1021.5.

SECOND CAUSE OF ACTION

Violation of Cal. Labor Code § 1102

(By All Plaintiffs on behalf of themselves and the Political Subclass Against Google)

- 355. Plaintiffs repeat and incorporate each paragraph above as if fully set forth here.
- 356. California Labor Code § 1102 makes it illegal for an employer to threaten employees with discharge, or to refuse to hire job applicants, as a means of coercing or influencing employees or job applicants' political activities.
- 357. California Labor Code § 1105 states, "Nothing in this chapter shall prevent the injured employee from recovering damages from his employer for injury suffered through a violation of this chapter."
- 358. Upon violation of this section preventing employers from controlling political activities of employees and job applicants, employees have a right of action for damages for breach of an employment contract. *Lockheed Aircraft Corp. v. Superior Court of Los Angeles County* (1946) 28 Cal.2d 481.
- 359. Plaintiffs and the Political Subclass engaged in protected political activity. Plaintiffs, and the Political Subclass members, expressed their political viewpoints, and as a result were



threatened and coerced, and/or were denied employment, throughout the respective Class Period by Google, who does not share their political views.

- 360. As a direct result of the aforesaid violations of law, as well as the job retaliation described above, Plaintiffs, and the Political Subclass, have sustained, and will continue to sustain for a period of time in the future, damages in an amount according to proof at the trial of this action.
- 361. As a direct and proximate result of Google's willful, knowing and intentional retaliation, Plaintiffs have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 362. These actions of Google were so cold, callous, and reckless as to be malicious. Plaintiffs and the Political Subclass are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 363. Plaintiffs, and the Class and Subclasses, pray for attorneys' fees and expenses pursuant to Code of Civil Procedure § 1021.5.

THIRD CAUSE OF ACTION

Hiring and Workplace Discrimination Due to Gender and/or Race in Violation of FEHA

(By Plaintiffs Damore, Gudeman, Amador, and Burns on behalf of themselves and the Gender and Race Subclasses Against Google)

- 364. Damore, Gudeman, Amador, Burns repeat and incorporate each paragraph above as if fully set forth here.
- 365. At all relevant times, Google was an employer covered by the Fair Employment and Housing Act ("FEHA"), and Damore, Gudeman, Amador, Burns and the Gender and Race Subclasses were covered employees and/or job applicants.
- 366. Google violated FEHA when they discriminated against Damore, Gudeman, Amador, Burns and the Gender and Race Subclass members because of their gender and/or race by, among other things, taking into account gender and/or race when considering hiring a job applicant, promotions, failing to protect employees from negative comments made about Caucasian men as



- 367. As a direct and proximate result of Google's willful, knowing and intentional gender and/or race discrimination, Damore, Gudeman, Amador, Burns, and the members of the Gender and Race Subclasses, have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and denial of employment benefits and job opportunities in an amount to be determined at trial.
- 368. These actions of Google were so cold, callous, and reckless as to be malicious.

 Damore, Gudeman, Amador, Burns, and Gender and Race Subclass members, are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 369. FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provision. Damore, Gudeman, Amador, and Burns have incurred, and are incurring, attorneys' fees and costs. Thus, should Damore, Gudeman, Amador, and Burns prevail at trial, they will be entitled to reasonable attorneys' fees and costs, pursuant to Govt. Code § 12965(b).

FOURTH CAUSE OF ACTION

Disparate Impact Discrimination Due to Gender and/or Race in Violation of FEHA (By Plaintiffs Amador and Burns on behalf of themselves and the Gender and Race Subclasses Against Google)

- 370. Amador and Burns repeat and incorporate each paragraph above as if fully set forth here.
- 371. At all relevant times, Google was an employer covered by the Fair Employment and Housing Act ("FEHA"), and Amador, Burns and the Gender and Race Subclasses were covered job applicants.
- 372. Google violated FEHA by having a hiring policy or practice that instructs, encourages, or permits hiring personnel to evaluate "cultural fit" of an applicant being considered, while simultaneously mandating that diversity be increased in all sectors of its employment and tolerating and approving a culture of discrimination and harassment against Caucasian/Asian men. This



selection policy or practice has a disproportionate adverse impact on Amador and Burns and the
Gender and Race Subclass members that are, or are perceived to be, white or Caucasian/Asian,
and/or male, is not, and cannot be, justified by business necessity, and was a substantial factor in
causing the same harm. Even if such a policy or practice could be justified by business necessity, less
discriminatory alternatives exist and would equally serve any alleged necessity. While Google
displays some employment statistics on its webpage, it does not publically release information or
statistics regarding when Google denies employment to males, Caucasians, and/or Asians.

- 373. Google has maintained these discriminatory policies, patterns, and/or practices both within and outside the liability period in this case, and the discriminatory policies, patterns, and/or practices have had a discriminatory impact on males and members of Google-disfavored races within the State of California.
- 374. As a direct and proximate result of Google's facially neutral policy of evaluating "cultural fit," Amador, Burns, and the members of the Gender and Race Subclasses have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 375. These actions of Google were so cold, callous, and reckless as to be malicious. Amador, Burns, and Gender and Race Subclass members, are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 376. FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provision. Amador and Burns have incurred, and are incurring, attorneys' fees and costs. Thus, should Amador, Burns, and/or Gender and Race Subclass members prevail at trial, they will be entitled to reasonable attorneys' fees and costs, pursuant to Govt. Code § 12965(b).

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FIFTH CAUSE OF ACTION

Workplace Harassment in Violation of FEHA (By Plaintiffs Damore and Gudeman Against Google)

- 377. Damore and Gudeman repeat and incorporate each paragraph above as if fully set forth here.
- 378. The FEHA provides that it is unlawful for an employer to harass an employee because of, *inter alia*, the employee's gender and/or race. Cal. Govt. Code § 12940(j).
- 379. Furthermore, it is unlawful to harass an employee for informing internal management about possible violations of the law.
- 380. Google constantly treated Damore and Gudeman in a discriminatory and harassing fashion after they reported labor code and California Civil Code violations, thus creating a hostile work environment.
- 381. The harassment was based on Damore and Gudeman's gender and/or race, and their constant reminders to Google to not break the law by taking into account protected categories, and giving members of Google-favored races and women special preferences when making hiring or promotion decisions. Any discussions to the contrary were ignored, or punished.
- 382. Among other things, Hölzle specifically encouraged and participated in the workplace harassment by bullying lower-level Google employees who failed to share his political opinions and views. Hölzle sought to seek out, silence, and retaliate against whistleblowers at Google who complained about Google's unlawful conduct. Hölzle, as a Senior Vice President at Google, also allowed other employees to engage in such behavior, giving employees the impressions that this harassing behavior was acceptable and/or encouraged at Google.
- 383. Google's conduct was so severe and pervasive that it altered Damore's and Gudeman's conditions of employment.
- 384. Google's treatment of Damore and Gudeman caused them to consider the work environment to be hostile and/or abusive, and a reasonable person in their circumstances would have similarly considered the work environment to be hostile and/or abusive.
 - 385. Damore and Gudeman made it clear to Google that such harassment was unwelcomed



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by reporting it to Google HR directly multiple times. However, Google failed to act.

- 386. Google's conduct was a substantial factor in causing Damore's and Gudeman's harm.
- 387. As a direct and proximate result of Google's willful, knowing, and intentional harassment, Damore and Gudeman have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 388. These actions of Google were so cold, callous, and reckless as to be malicious. Damore and Gudeman are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 389. FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provision. Damore and Gudeman have incurred, and are incurring, attorneys' fees and costs. Thus, should Damore and Gudeman prevail at trial, they will be entitled to reasonable attorneys' fees and costs, pursuant to Govt. Code § 12965(b).

SIXTH CAUSE OF ACTION

Retaliation in Violation of FEHA

(By Plaintiffs Damore, Gudeman, and Amador Against Google)

- 390. Damore, Gudeman, and Amador repeat and incorporate each paragraph above as if fully set forth here.
- 391. California Government Code § 12940(h) provides that it is unlawful for any employer or person to discriminate against any person because the person has opposed any practices forbidden under the Fair Employment and Housing Act, Government Code § 12940, *et seq*.
- 392. Damore, Gudeman, and Amador opposed Google's unlawful hiring and promoting practices in violation of California Government Code § 12940 *et seq.* by complaining to their supervisors and Google HR on several occasions.
- 393. Specially, Damore, Gudeman, and Amador reported to Google numerous occasions of hostile comments made by coworkers regarding the Plaintiffs' gender and/or race.
- 394. Damore, Gudeman, and Amador further complained regarding the unlawful hiring and promoting practices taking place at Google.

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	395.	In retaliation for objecting to such unlaw	vful conduct in violation of FEHA, Google
took ad	verse e	employment action against Damore, Guden	nan, and Amador by issuing them verbal and
written	warnin	ngs, by refusing to rehire Amador, and by	providing them with decreased performance
reviews			

- 396. There is a causal link between Damore, Gudeman, and Amador complaining to report Google's illegal activities, harassment, discrimination, and the subsequent retaliation they suffered.
- 397. In so retaliating against Damore, Gudeman, and Amador, Google violated the Fair Employment and Housing Act, among other statutes and California common law.
- 398. As a direct and proximate result of Google's willful, knowing, and intentional retaliation, Damore, Gudeman, and Amador have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 399. These actions of Google were so cold, callous, and reckless as to be malicious. Damore, Gudeman, and Amador are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 400. FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provision. Damore, Gudeman, and Amador have incurred, and are incurring, attorneys' fees and costs. Thus, should Damore, Gudeman, and Amador prevail at trial, they will be entitled to reasonable attorneys' fees and costs, pursuant to Govt. Code § 12965(b).

SEVENTH CAUSE OF ACTION

Retaliation in Violation of Public Policy (*Tameny*) (By Plaintiffs Damore and Gudeman Against Google)

- 401. Damore and Gudeman repeat and incorporate each paragraph above as if fully set forth here.
- 402. Reprimanding employees in retaliation for resisting the violations of laws that secure important public policies contravenes those policies, and gives rise to a common law action in tort.

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- 403. Damore and Gudeman were given verbal and written warnings after complaining about Google's unlawful hiring and promoting practices. Google's violation of Damore's and Gudeman's statutory and constitutional rights is inconsistent and hostile to the public's interest.
- 404. Google's justifications for reprimanding Damore and Gudeman are pretextual in nature and calculated to disguise the motivating basis of the adverse employment action to which Damore and Gudeman were subjected.
- 405. As a direct and proximate result of Google's willful, knowing, and intentional retaliation, Damore and Gudeman have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 406. These actions of Google were so cold, callous, and reckless as to be malicious. Damore and Gudeman are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 407. Damore and Gudeman pray for reasonable attorneys' fees and expenses pursuant to Code of Civil Procedure § 1021.5.

EIGHTH CAUSE OF ACTION

Retaliation in Violation of Cal. Labor Code § 1102.5 (By Plaintiffs Damore, Gudeman, and Amador Against Google)

- 408. Damore, Gudeman, and Amador repeat and incorporate each paragraph above as if fully set forth here.
- 409. California Labor Code § 1102.5 (a), in pertinent part, provides: "An employer, or any person acting on behalf of the employer, shall not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency, to a person with authority over the employee, or to another employee who has authority to investigate, discover, or correct the violation or noncompliance, or from providing information to, or testifying before, any public body conducting an investigation, hearing, or inquiry, if the employee has reasonable cause to believe that the information discloses a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation, regardless of whether



disclosing the information is part of the employee's job duties." Labor Code § 1102.5 subsections (c)
& (d) provides: "An employer, or any person acting on behalf of the employer, shall not retaliate
against an employee for refusing to participate in an activity that would result in a violation of state or
federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation. (d)
An employer, or any person acting on behalf of the employer, shall not retaliate against an employee
for having exercised his or her rights under subdivision (a), (b), or (c) in any former employment."

- 410. As set forth above, Damore, Gudeman, and Amador opposed Google's wrongful and illegal practices to discriminate, harass, and retaliate against individuals based on their protected traits.
- 411. Thereafter, Google took a series of retaliatory adverse employment actions against Damore, Gudeman, and Amador such as giving them poor performance reviews, denying them promotions, and/or refusing to rehire.
- 412. As a direct and proximate result of Google's willful, knowing, and intentional retaliation, Damore, Gudeman, and Amador have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 413. These actions of Google were so cold, callous, and reckless as to be malicious.

 Damore, Gudeman, and Amador are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 414. Damore, Gudeman, and Amador pray for reasonable attorneys' fees and expenses pursuant to Code of Civil Procedure § 1021.5.

NINTH CAUSE OF ACTION

Failure to Prevent Discrimination, Harassment, and Retaliation in Violation of FEHA (By Plaintiffs Damore, Gudeman, Amador, and Burns Against Google)

- 415. Damore, Gudeman, Amador, and Burns repeat and incorporate each paragraph above as if fully set forth here.
- 416. At all relevant times, Google was required, but failed, to take all reasonable steps necessary to prevent discrimination, harassment, and retaliation under Government Code § 12940(k), et seq.



417. Upon information and belief, Google's lack of any meaningful investigation into
Damore's, Gudeman's, Amador's, and Burns's complaints of coworkers' discriminatory, harassing,
and retaliatory behavior constituted failure to prevent discrimination under the FEHA, including as to
Defendants' discriminatory and unlawful hiring practices.

- 418. As a direct and proximate result of Google's willful, knowing and intentional failure to take all reasonable steps necessary to prevent discrimination, harassment, and retaliation, Damore, Gudeman, Amador, and Burns have suffered and will continue to suffer emotional and physical distress and injury, stress, humiliation, anxiety, depression, and loss of employment benefits and job opportunities in an amount to be determined at trial.
- 419. These actions of Google were so cold, callous and reckless as to be malicious. Damore, Gudeman, Amador, and Burns are therefore entitled to an award of punitive damages in an amount to be determined at trial.
- 420. FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provision. Damore, Gudeman, Amador, and Burns have incurred, and are incurring, attorneys' fees and costs. Thus, should Damore, Gudeman, Amador, and Burns prevail at trial, they will be entitled to reasonable attorneys' fees and costs, pursuant to Govt. Code § 12965(b).

TENTH CAUSE OF ACTION

Hostile Work Environment

(By Damore and Gudeman on behalf of themselves and the Hostile Work Environment Subclass Against Google)

- 421. Damore and Gudeman repeat and incorporate each paragraph above as if fully set forth here.
- 422. At all times mentioned, Google was subject to FEHA. All Plaintiffs were members of groups protected by FEHA and Government Code § 12940(j)(1), which makes the harassment of an employee because of their sex, gender, or race unlawful if the entity, or its agents or supervisors, knew or should have known of this conduct and failed to take immediate and appropriate corrective action.
 - 423. Damore, Gudeman, and the Hostile Work Environment Subclass were targets of



DIG DHILLON LAW GROUP INC. harassment and discrimination. Fellow Google employees, including managers attacked them for expressing being males and/or Caucasians/Asian both in person and publicly on internal Google message boards, including but not limited to Dory, Google+, and Memegen.

- 424. Google facilitated this conduct by providing Dory, Google+, and Memegen and other internal message boards as platforms throughout which harassing commentary was pervasive.
- 425. A reasonable person would have recognized the environment created by Google to be hostile and abusive. The hostile environment created by Google's conduct was so severe and pervasive that it fundamentally and substantially altered Damore's, Gudeman's, and the members of the Hostile Work Environment Subclass' working conditions.
- 426. Damore and Gudeman, and other Google employees, reported this harassment and discrimination to Google through their managers and the Human Resources Department, and made clear that the harassing comments were unwelcome. However, even after this harassment and discrimination was reported, Damore, Gudeman, and the Hostile Work Environment Subclass still continued to experience it.
- 427. Google failed to conduct any meaningful investigation into Damore's and Gudeman's complaints of coworkers' discrimination and harassment against males, Caucasians and/or Asians. Google failed to take all reasonable steps to prevent discrimination and harassment from occurring in violation of FEHA. Google's inaction and failure to take corrective actions only contributed to the hostile workplace environment for males, Caucasians, and Asians.
- 428. As a direct, foreseeable and proximate result of Google's unlawful actions, Damore, Gudeman, and the Hostile Work Environment Subclass have suffered and continue to suffer economic losses, losses in earnings, loss of employment benefits, and other benefits.
- 429. As a further direct, foreseeable and proximate result of Google's actions, Damore, Gudeman, and the Hostile Work Environment Subclass have suffered emotional distress, humiliation, shame, and embarrassment in an amount to be proven at trial.
- 430. Google committed the acts herein despicably, maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Damore and Gudeman, from an improper and evil motive amounting to malice, and in conscious disregard of Damore's, Gudeman's, and the Hostile

Work Environment Subclass' rights to be free from discrimination. Damore, Gudeman, and the Hostile Work Environment Subclass are thus entitled to recover punitive damages from Defendant in an amount to be proven at trial.

431. FEHA provides for an award of reasonable attorneys' fees and costs incurred by a prevailing plaintiff in an action brought under its provision. Damore and Gudeman have incurred, and are incurring, attorneys' fees and costs. Thus, should Damore, Gudeman, and/or the Hostile Work Environment Subclass prevail at trial, they will be entitled to reasonable attorneys' fees and costs, pursuant to Govt. Code § 12965(b).

ELEVENTH CAUSE OF ACTION

Unfair Business Practices, Bus. & Prof. Code § 17200 et seq. (By All Plaintiffs on Behalf of Themselves and the Plaintiff Class Against Google)

- 432. Plaintiffs repeat and incorporate each paragraph above as if fully set forth here.
- 433. Google's violations of the California Labor Code, and California statutory and common law, and other provisions, as described above in the causes of action listed in this First Amended Complaint, all constitute unfair and unlawful business practices pursuant to Business & Professions Code § 17200 *et seq*.
 - 434. The unlawful conduct described herein resulted in harm to Plaintiffs and the Class.
- 435. As a direct and proximate result of the acts mentioned herein, Google has received and continue to receive ill-gotten gains belonging to Plaintiffs and the Class.
- 436. Plaintiffs and the Class are entitled to restitution and disgorgement of ill-gotten gains in an amount to be determined at trial.
- 437. Because the conduct alleged herein is ongoing, and there is no indication that either Google will cease their unlawful conduct described herein, Plaintiffs and the Class and Subclasses request that this Court enjoin Google from further violations of California's laws.

TWELFTH CAUSE OF ACTION

Declaratory Relief

(By All Plaintiffs on Behalf of Themselves and the Plaintiff Class Against Google)

438. Plaintiffs repeat and incorporate each paragraph above as if fully set forth here.



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439. An actual controversy has arisen and now exists between the parties relating to the legal
rights and duties of the parties as set forth above, for which Plaintiffs and the Subclasses desire
declaration of rights and other relief available pursuant to the California Declaratory Judgment Ac
Code of Civil Procedure § 1060 et seq.

440. A declaratory judgment is necessary and proper in that Plaintiffs and the Subclasses contend that Google has committed and continues to commit the violations set forth above and, on information and belief, Google will deny that it has done so and/or will continue to commit such acts.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, on behalf of themselves and all others similarly situated, respectfully pray for relief and judgment against Defendants, jointly and severally, as follows, in amounts according to proof:

- 1. For an order certifying this action as a class action;
- 2. For an order appointing Plaintiffs as Class/Subclass representatives, and appointing Plaintiffs' counsel as Class/Subclass counsel;
 - For judgment in favor of Plaintiffs against Defendants;
- 4. For preliminary and permanent injunctive relief enjoining Google from violating California Labor Code §§ 1101 and 1102 et seq. by discriminating, harassing, and retaliating against individuals with conservative political views;
- 5. For restitution and disgorgement of ill-gotten gains as ascribed in the Eleventh Cause of Action:
 - For declaratory relief as ascribed in the Twelfth Cause of Action; For damages;
 - 7. For pre-judgment interest where allowed in an amount according to proof;
- 8. For attorneys' fees under applicable provisions of law, including but not limited to FEHA and Code of Civil Procedure § 1021.5;
 - 9. For costs of suit incurred herein; and
 - 10. For such other and further relief as the Court deems just and proper.



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1 Respectfully submitted, 2 Date: April 17, 2018 DHILLON LAW GROUP INC. 3 4 Harmeet K. Dhillon 5 Ravdeep S. Grewal Gregory R. Michael 6 7 Attorneys for Plaintiffs James Damore, David Gudeman, Manuel Amador, Stephen McPherson, 8 Michael Burns, and all others similarly situated 9 **DEMAND FOR JURY TRIAL** 10 11 Plaintiffs demand a trial by jury for all claims. 12 Date: April 17, 2018 DHILLON LAW GROUP INC. 13 14 Harmeet K. Dhillon 15 Ravdeep S. Grewal Gregory R. Michael 16 17 Attorneys for Plaintiffs James Damore, David Gudeman, Manuel Amador, Stephen McPherson, 18 Michael Burns, and all others similarly situated 19 20 21 22 23 24 25 26 27 28



EXHIBIT A

Google's Ideological Echo Chamber

How bias clouds our thinking about diversity and inclusion

go/pc-considered-harmful

James Damore - damore@ July 2017

Feel free to comment (they aren't disabled, the doc may just be overloaded).

For longer form discussions see g/pc-harmful-discuss

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Reply to public response and misrepresentation

I value diversity and inclusion, am not denying that sexism exists, and don't endorse using stereotypes. When addressing the gap in representation in the population, we need to look at population level differences in distributions. If we can't have an honest discussion about this, then we can never truly solve the problem.

Psychological safety is built on mutual respect and acceptance, but unfortunately our culture of shaming and misrepresentation is disrespectful and unaccepting of anyone outside its echo chamber.

Despite what the public response seems to have been, I've gotten many†personal messages from fellow Googlers expressing their gratitude for bringing up these very important issues which they agree with but would never have the courage to say or defend because of our shaming culture and the possibility of being fired. This needs to change.

TL;DR

- Google's political bias has equated the freedom from offense with psychological safety, but shaming into silence is the antithesis of psychological safety.
- This silencing has created an ideological echo chamber where some ideas are too sacred to be honestly discussed.
- The lack of discussion fosters the most extreme and authoritarian elements of this ideology.
 - Extreme: all disparities in representation are due to oppression
 - o Authoritarian: we should discriminate to correct for this oppression
- Differences in distributions of traits between men and women may in part explain why we don't have 50% representation of women in tech and leadership.
- Discrimination to reach equal representation is unfair, divisive, and bad for business.

Background₁

People generally have good intentions, but we all have biases which are invisible to us. Thankfully, open and honest discussion with those who disagree can highlight our blind spots and help us grow, which is why I wrote this document₂. Google has several biases and honest discussion about these biases is being silenced by the dominant ideology. What follows is by no means the complete story, but it's a perspective that desperately needs to be told at Google.

Google's biases

At Google, we talk so much about unconscious bias as it applies to race and gender, but we rarely discuss our moral biases. Political orientation is actually a result of deep moral preferences and thus biases. Considering that the overwhelming majority of the social sciences, media, and Google lean left, we should critically examine these prejudices:

Left Biases	Right Biases
Compassion for the weak	Respect for the strong/authority
Disparities are due to injustices	Disparities are natural and just
Humans are inherently cooperative	Humans are inherently competitive

¹ This document is mostly written from the perspective of Google's Mountain View campus, I can't speak about other offices or countries.

² Of course, I may be biased and only see evidence that supports my viewpoint. In terms of political biases, I consider myself a classical liberal and strongly value individualism and reason. I'd be very happy to discuss any of the document further and provide more citations.

Change is good (unstable)	Change is dangerous (stable)
Open	Closed
Idealist	Pragmatic

Neither side is 100% correct and both viewpoints are necessary for a functioning society or, in this case, company. A company too far to the right may be slow to react, overly hierarchical, and untrusting of others. In contrast, a company too far to the left will constantly be changing (deprecating much loved services), over diversify its interests (ignoring or being ashamed of its core business), and overly trust its employees and competitors.

Only facts and reason can shed light on these biases, but when it comes to diversity and inclusion, Google's left bias has created a politically correct monoculture that maintains its hold by shaming dissenters into silence. This silence removes any checks against encroaching extremist and authoritarian policies. For the rest of this document, I'll concentrate on the extreme stance that all differences in outcome are due to differential treatment and the authoritarian element that's required to actually discriminate to create equal representation.

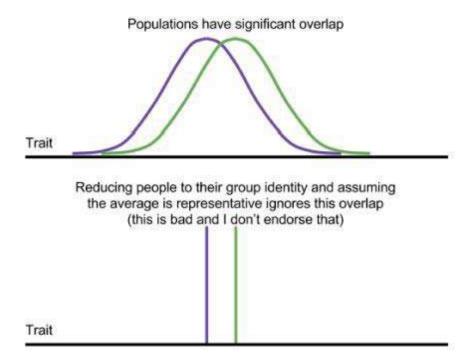
Possible non-bias causes of the gender gap in tech3

At Google, we're regularly told that implicit (unconscious) and explicit biases are holding women back in tech and leadership. Of course, men and women experience bias, tech, and the workplace differently and we should be cognizant of this, but it's far from the whole story.

On average, men and women biologically differ in many ways. These differences aren't just socially constructed because:

- They're universal across human cultures
- They often have clear biological causes and links to prenatal testosterone
- Biological males that were castrated at birth and raised as females often still identify and act like males
- The underlying traits are highly heritable
- They're exactly what we would predict from an evolutionary psychology perspective Note, I'm not saying that all men differ from all women in the following ways or that these differences are "just." I'm simply stating that the distribution of preferences and abilities of men and women differ in part due to biological causes and that these differences may explain why we don't see equal representation of women in tech and leadership. Many of these differences are small and there's significant overlap between men and women, so you can't say anything about an individual given these population level distributions.

³ Throughout the document, by "tech", I mostly mean software engineering.



Personality differences

Women, on average, have more:

- Openness directed towards feelings and aesthetics rather than ideas. Women generally
 also have a stronger interest in people rather than things, relative to men (also
 interpreted as empathizing vs. systemizing).
 - These two differences in part explain why women relatively prefer jobs in social or artistic areas. More men may like coding because it requires systemizing and even within SWEs, comparatively more women work on front end, which deals with both people and aesthetics.
- Extraversion expressed as gregariousness rather than assertiveness. Also, higher agreeableness.
 - This leads to women generally having a harder time negotiating salary, asking for raises, speaking up, and leading. Note that these are just average differences and there's overlap between men and women, but this is seen solely as a women's issue. This leads to exclusory programs like Stretch and swaths of men without support.
- Neuroticism (higher anxiety, lower stress tolerance).
 - This may contribute to the higher levels of anxiety women report on Googlegeist and to the lower number of women in high stress jobs.

Note that contrary to what a social constructionist would argue, research suggests that "greater nation-level gender equality leads to psychological dissimilarity in men's and women's personality traits." Because as "society becomes more prosperous and more egalitarian, innate dispositional differences between men and women have more space to develop and the gap that exists between men and women in their personality traits becomes wider." We need to stop assuming that gender gaps imply sexism.

Men's higher drive for status

We always ask why we don't see women in top leadership positions, but we never ask why we see so many men in these jobs. These positions often require long, stressful hours that may not be worth it if you want a balanced and fulfilling life.

Status is the primary metric that men are judged on4, pushing many men into these higher paying, less satisfying jobs for the status that they entail. Note, the same forces that lead men into high pay/high stress jobs in tech and leadership cause men to take undesirable and dangerous jobs like coal mining, garbage collection, and firefighting, and suffer 93% of work-related deaths.

Non-discriminatory ways to reduce the gender gap

Below I'll go over some of the differences in distribution of traits between men and women that I outlined in the previous section and suggest ways to address them to increase women's representation in tech without resorting to discrimination. Google is already making strides in many of these areas, but I think it's still instructive to list them:

- Women on average show a higher interest in people and men in things
 - We can make software engineering more people-oriented with pair programming and more collaboration. Unfortunately, there may be limits to how people-oriented certain roles at Google can be and we shouldn't deceive ourselves or students into thinking otherwise (some of our programs to get female students into coding might be doing this).
- Women on average are more cooperative
 - Allow those exhibiting cooperative behavior to thrive. Recent updates to Perf may be doing this to an extent, but maybe there's more we can do.
 - This doesn't mean that we should remove all competitiveness from Google.
 Competitiveness and self reliance can be valuable traits and we shouldn't necessarily disadvantage those that have them, like what's been done in education.
- Women on average are more prone to anxiety

⁴ For heterosexual romantic relationships, men are more strongly judged by status and women by beauty. Again, this has biological origins and is culturally universal.

- Make tech and leadership less stressful. Google already partly does this with its many stress reduction courses and benefits.
- Women on average look for more work-life balance while men have a higher drive for status on average
 - Unfortunately, as long as tech and leadership remain high status, lucrative careers, men may disproportionately want to be in them. Allowing and truly endorsing (as part of our culture) part time work though can keep more women in tech.
- The male gender role is currently inflexible
 - Feminism has made great progress in freeing women from the female gender role, but men are still very much tied to the male gender role. If we, as a society, allow men to be more "feminine," then the gender gap will shrink, although probably because men will leave tech and leadership for traditionally "feminine" roles.

Philosophically, I don't think we should do arbitrary social engineering of tech just to make it appealing to equal portions of both men and women. For each of these changes, we need principled reasons for why it helps Google; that is, we should be optimizing for Google—with Google's diversity being a component of that. For example, currently those willing to work extra hours or take extra stress will inevitably get ahead and if we try to change that too much, it may have disastrous consequences. Also, when considering the costs and benefits, we should keep in mind that Google's funding is finite so its allocation is more zero-sum than is generally acknowledged.

The harm of Google's biases

I strongly believe in gender and racial diversity, and I think we should strive for more. However, to achieve a more equal gender and race representation, Google has created several discriminatory practices:

- Programs, mentoring, and classes only for people with a certain gender or races
- A high priority queue and special treatment for "diversity" candidates
- Hiring practices which can effectively lower the bar for "diversity" candidates by decreasing the false negative rate
- Reconsidering any set of people if it's not "diverse" enough, but not showing that same scrutiny in the reverse direction (clear confirmation bias)
- Setting org level OKRs for increased representation which can incentivize illegal discrimination₅

⁵ Stretch, BOLD, CSSI, Engineering Practicum (to an extent), and several other Google funded internal and external programs are for people with a certain gender or race.

⁶ Instead set Googlegeist OKRs, potentially for certain demographics. We can increase representation at an org level by either making it a better environment for certain groups (which would be seen in survey scores) or discriminating based on a protected status (which is illegal and I've seen it done). Increased representation OKRs can incentivize the latter and create zero-sum struggles between orgs.

These practices are based on false assumptions generated by our biases and can actually increase race and gender tensions. We're told by senior leadership that what we're doing is both the morally and economically correct thing to do, but without evidence this is just veiled left ideology, that can irreparably harm Google.

Why we're blind

We all have biases and use motivated reasoning to dismiss ideas that run counter to our internal values. Just as some on the Right deny science that runs counter to the "God > humans > environment" hierarchy (e.g., evolution and climate change), the Left tends to deny science concerning biological differences between people (e.g., IQ₈ and sex differences). Thankfully, climate scientists and evolutionary biologists generally aren't on the right. Unfortunately, the overwhelming majority of humanities and social sciences lean left (about 95%), which creates enormous confirmation bias, changes what's being studied, and maintains myths like social constructionism and the gender wage gap₈. Google's left leaning makes us blind to this bias and uncritical of its results, which we're using to justify highly politicized programs.

In addition to the Left's affinity for those it sees as weak, humans are generally biased towards protecting females. As mentioned before, this likely evolved because males are biologically disposable and because women are generally more cooperative and agreeable than men. We have extensive government and Google programs, fields of study, and legal and social norms to protect women, but when a man complains about a gender issue issue affecting men, he's labelled as a misogynist and a whiner₁₀. Nearly every difference between men and women is interpreted as a form of women's oppression. As with many things in life, gender differences are often a case of "grass being greener on the other side"; unfortunately, taxpayer and Google money is being spent to water only one side of the lawn.

⁷ Communism promised to be both morally and economically superior to capitalism, but every attempt became morally corrupt and an economic failure. As it became clear that the working class of the liberal democracies wasn't going to overthrow their "capitalist oppressors," the Marxist intellectuals transitioned from class warfare to gender and race politics. The core oppressor-oppressed dynamics remained, but now the oppressor is the "white, straight, cis-gendered patriarchy."

⁸ Ironically, IQ tests were initially championed by the Left when meritocracy meant helping the victims of aristocracy.

⁹ Yes, in a national aggregate, women have lower salaries than men for a variety of reasons. For the same work though, women get paid just as much as men. Considering women spend more money than men and that salary represents how much the employee sacrifices (e.g. more hours, stress, and danger), we really need to rethink our stereotypes around power.

^{10 &}quot;The traditionalist system of gender does not deal well with the idea of men needing support. Men are expected to be strong, to not complain, and to deal with problems on their own. Men's problems are more often seen as personal failings rather than victimhood, due to our gendered idea of agency. This discourages men from bringing attention to their issues (whether individual or group-wide issues), for fear of being seen as whiners, complainers, or weak."

This same compassion for those seen as weak creates political correctness₁₁, which constrains discourse and is complacent to the extremely sensitive PC-authoritarians that use violence and shaming to advance their cause. While Google hasn't harbored the violent leftist protests that we're seeing at universities, the frequent shaming in TGIF and in our culture has created the same silent, psychologically unsafe environment.

Suggestions

I hope it's clear that I'm not saying that diversity is bad, that Google or society is 100% fair, that we shouldn't try to correct for existing biases, or that minorities have the same experience of those in the majority. My larger point is that we have an intolerance for ideas and evidence that don't fit a certain ideology. I'm also not saying that we should restrict people to certain gender roles; I'm advocating for quite the opposite: treat people as individuals, not as just another member of their group (tribalism).

My concrete suggestions are to:

- De-moralize diversity.
 - As soon as we start to moralize an issue, we stop thinking about it in terms of costs and benefits, dismiss anyone that disagrees as immoral, and harshly punish those we see as villains to protect the "victims."
- Stop alienating conservatives.
 - Viewpoint diversity is arguably the most important type of diversity and political orientation is one of the most fundamental and significant ways in which people view things differently.
 - In highly progressive environments, conservatives are a minority that feel like they need to stay in the closet to avoid open hostility. We should empower those with different ideologies to be able to express themselves.
 - Alienating conservatives is both non-inclusive and generally bad business because conservatives tend to be higher in conscientiousness, which is required for much of the drudgery and maintenance work characteristic of a mature company.
- Confront Google's biases.
 - o I've mostly concentrated on how our biases cloud our thinking about diversity and inclusion, but our moral biases are farther reaching than that.
 - I would start by breaking down Googlegeist scores by political orientation and personality to give a fuller picture into how our biases are affecting our culture.
- Stop restricting programs and classes to certain genders or races.
 - These discriminatory practices are both unfair and divisive. Instead focus on some of the non-discriminatory practices I outlined.

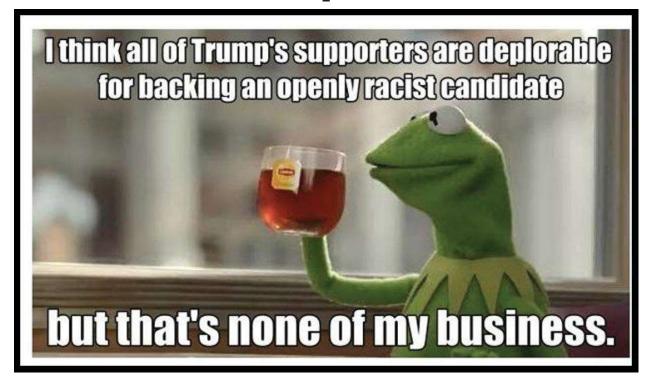
¹¹ Political correctness is defined as "the avoidance of forms of expression or action that are perceived to exclude, marginalize, or insult groups of people who are socially disadvantaged or discriminated against," which makes it clear why it's a phenomenon of the Left and a tool of authoritarians.

- Have an open and honest discussion about the costs and benefits of our diversity programs.
 - Discriminating just to increase the representation of women in tech is as misguided and biased as mandating increases for women's representation in the homeless, work-related and violent deaths, prisons, and school dropouts.
 - There's currently very little transparency into the extent of our diversity programs which keeps it immune to criticism from those outside its ideological echo chamber.
 - These programs are highly politicized which further alienates non-progressives.
 - I realize that some of our programs may be precautions against government accusations of discrimination, but that can easily backfire since they incentivize illegal discrimination.
- Focus on psychological safety, not just race/gender diversity.
 - We should focus on psychological safety, which has shown positive effects and should (hopefully) not lead to unfair discrimination.
 - We need psychological safety and shared values to gain the benefits of diversity.
 - Having representative viewpoints is important for those designing and testing our products, but the benefits are less clear for those more removed from UX.
- De-emphasize empathy.
 - O I've heard several calls for increased empathy on diversity issues. While I strongly support trying to understand how and why people think the way they do, relying on affective empathy—feeling another's pain—causes us to focus on anecdotes, favor individuals similar to us, and harbor other irrational and dangerous biases. Being emotionally unengaged helps us better reason about the facts.
- Prioritize intention.
 - Our focus on microaggressions and other unintentional transgressions increases our sensitivity, which is not universally positive: sensitivity increases both our tendency to take offence and our self censorship, leading to authoritarian policies. Speaking up without the fear of being harshly judged is central to psychological safety, but these practices can remove that safety by judging unintentional transgressions.
 - Microaggression training incorrectly and dangerously equates speech with violence and isn't backed by evidence.
- Be open about the science of human nature.
 - Once we acknowledge that not all differences are socially constructed or due to discrimination, we open our eyes to a more accurate view of the human condition which is necessary if we actually want to solve problems.
- Reconsider making Unconscious Bias training mandatory for promo committees.

- We haven't been able to measure any effect of our Unconscious Bias training and it has the potential for overcorrecting or backlash, especially if made mandatory.
- Some of the suggested methods of the current training (v2.3) are likely useful, but the political bias of the presentation is clear from the factual inaccuracies and the examples shown.
- Spend more time on the many other types of biases besides stereotypes.
 Stereotypes are much more accurate and responsive to new information than the training suggests (I'm not advocating for using stereotypes, I just pointing out the factual inaccuracy of what's said in the training).

EXHIBIT B

1





This is not the time for "not all (whatever)". The choice to be a Republican is the choice to align yourself with a white supremacist, xenophobic regime. That wasn't true in 2015, but it's true now.



Like, it's not popular to say, but one of two major American political party has adopted white supremacy as a political platform. If you prefer, take that as a hypothetical: if a major American political party announced that a subset of Americans were sub-human, is that something Google should permit because we don't want to offend? Because we might lose money? Diversity is itself political for a subset of people—should we skip that, too, because there are some American voters who object to it?



"legitimate world views" "Conservative Christianity" I admire your tolerance, but pairing those two phrases still sounds like an oxymoron to me. How is supporting a racist not racist? How is saying "I'm going to elect a man who says he will immediately deport 11 million Mexicans and cast a shroud of suspicion on all Muslims" not racist?

Chuck Simmons

Nov 9, 5:29 PM



Josh Beitelspacher > google.com

Aug 13, 6:05 PM

Conservative values:

Women: Grab them by the pussy. You can do anything.

White supremacists: We condemn in the strongest possible terms this egregious display of hatred, bigotry and violence, on many sides. **On many sides**.

Immigrants: They're bringing drugs, they're bringing crime, they're rapists, and some, I assume, are good people.

If you're concerned about discussing conservative values at work, maybe you should be. Maybe that's a feature, and not a bug.



3

2:08 PM Yesterday

A majority of people who identify themselves as "Republicans" also believe the Earth is 10,000 years old. Therefore by logical deduction, I personally believe that a majority of self-identified "Republicans" can be placed in the bucket category of idiots (or uneducated) and am not afraid to say it in a forum like Memegen. Now I'm not at all singling out an individual "Republican" as an idiot. That would be a Jerk and not at all appropriate in the workplace (go/no-jerks). I know many Republican voters who are smart, intelligent, kind, etc. They just generally prioritize things differently than I do.

Reply

Likewise, in a forum like Memegen, I also feel it is OK to categorize people who think the earth is flat as idiots. I still wouldn't do it in a normal workplace setting however. And I would never do it to an individual.

2:15 PM Yesterday (edited 2:16 PM Yesterday)



4



Robert Lehmann ▶ google.com IIII

Nov 11, 2016



Dear Lazyplus, dear Trump supporters,

I keep hearing people feeling unsafe about supporting Trump.

Please help me understand how — as a rational person, as a Googler — anyone could possibly support Trump? I understand opposing Hillary Clinton, but supporting a character that's been openly racist, sexist, and other horrible things and incites other to be the same?

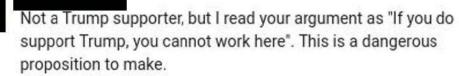
I don't think our basic value system of human rights is a negotiable issue.

Dignity is no tit-for-tat game. I can understand having a different political view regarding government, regulations, or economy. I can seek rational discourse with people denying climate change, doubting evolution, and maybe even opposing democracy as a whole. There's just some things which are out of the question, and inciting hate against parts of the populace is one of them.

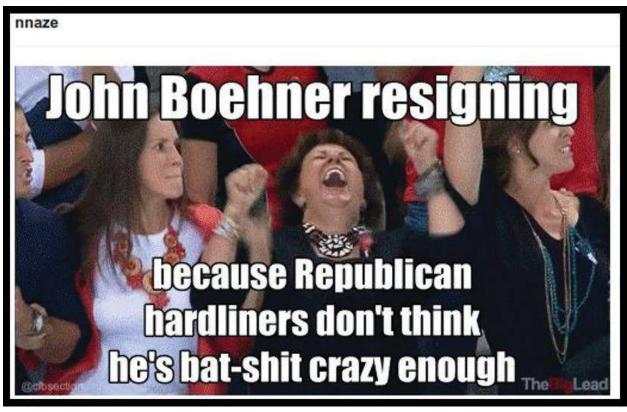
If I may make a comparison not earning me the Godwin medal right there: If an L9 sexually harasses someone we cannot go and argue, "hey, but he's a great engineer, and all of his reports are happy with him!" This lapse weighs stronger. For us as a company, we have decided there a central set of values that are set in stone, and which trump every other argument. The same should apply to our society and its political leaders.



31w







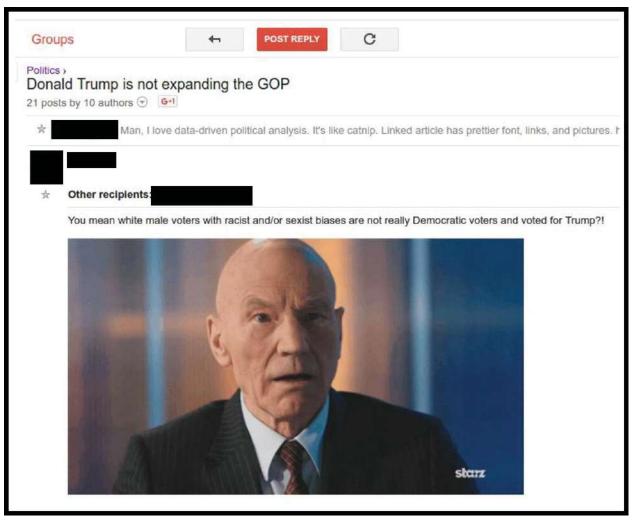
6

what you and I see when we look at history is so fundamentally different that I have to assume that you're deeply deceived or having some sort of psychotic break from reality.

I see that the US prior to Clinton had a much more robust welfare system, you seem to think that it can't have been more socialist.

I see Scandanavian capitalist/socialist states as making their people significantly happier, while maintaining a quality of life significantly higher than in the US, with a lower total taxes + fees + replacement costs burden than the US. Canada has chosen a balance point between Norway/Sweden/Denmark and the US and is comparably better than the US but not as effective as the Scandanavian states. You see everything non-US as a disaster.

What you think of as information is nonsense. What you've been told are facts are dangerous lies. Please join us in reality. Until then, I have to think of you as part of the dangerous semantic noise spawned by Fox News and AM talk radio.



8

Alon Altman Yesterday 10:31 PM +6



Google does have a culture problem. was part of that problem. He did us a great service by resigning.



Alon Altman Yesterday 10:51 PM +7

Regarding being inclusive of all people vs being inclusive of all ideas:

will be welcome at Google again if he changed his mind and accepted the company's values of inclusion.

Erica Baker could not stop being a black woman in order to feel included. Kelly Ellis could not choose not to be harassed.

We want to be inclusive of **people** not **ideas**. We are indeed intolerant of ideas that are intolerant of others. We also believe that people can change for the better (e.g. hiring **+Chris Poole**). But we should not accept people who are toxic and unwilling to change.





January 13, 2017, 11:38 AM PST

Every time someone makes a meme like this, I have to point out: political and religious opinions do not need the same accommodations as gender and race *identities*. If you feel uncomfortable around people who do not share your beliefs, you need to reevaluate them, not pressure others into assuaging you.

← REPLY



Brian Swetland ▶ google.com III

Aug 5, 5:19 PM

I once again find myself severely disappointed with management's apparent inability or (worse) lack of desire to provide a non-toxic environment.

Seriously, if I wanted to work somewhere where white nationalists, racists, climate deniers, and misogynists were supported as viewpoints worthy of protection, I'd find a job at Fox News or in the Trump Administration.

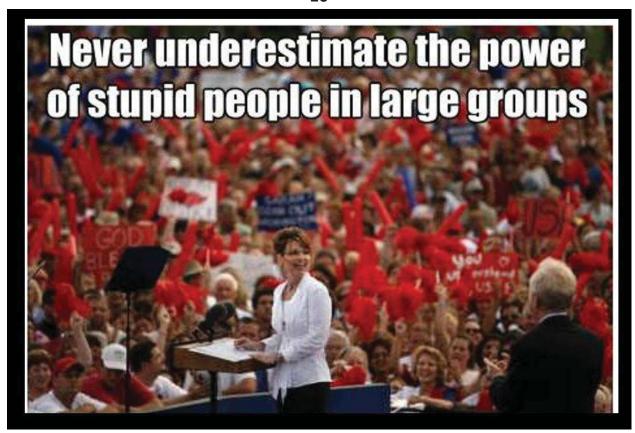
If management is having trouble deciding whether this should be a safe place for Nazis or for anyone-who's-not-a-white-man, well, I really don't think this is a hard question to answer.







Restricted to google.com





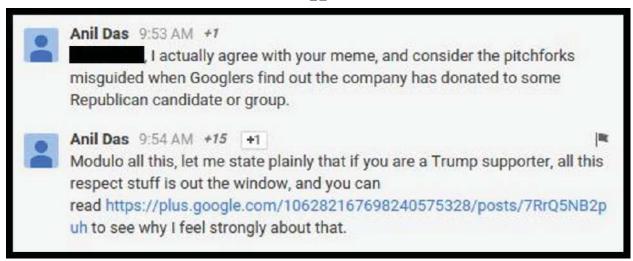
Axel Wagner

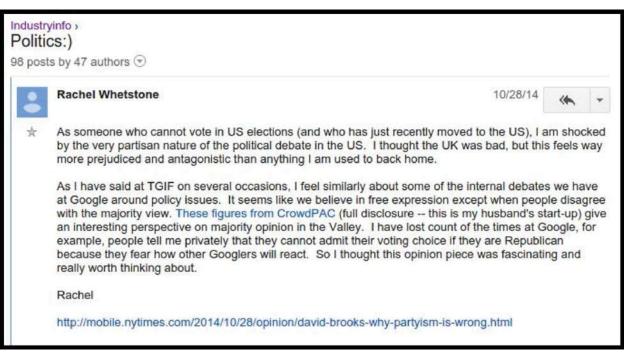
2:26 AM Mar 4 ·

Intolerance deserves no tolerance. It's a common fallacy to think it does. I consider Trump to be actively dangerous to the well-being of a significant part of the world. I don't **really** care about the US, they brought it on themselves. I care about the rest of the world, that he intends - to varying degrees, ranging from "pissing off" over "send troops" to "commit war crimes" - to declare war on).

I could care less about people being republican. But I won't tolerate trump-voters.

Reply





12



it hard for Trump supporters to be heard by groups that prioritize the human rights the most.

Jaana Burcu Dogan Nov 9, 5:06 PM

13



We all have Googler colleagues who supported Trump, but cannot admit it due to the tyranny of the internal majority. What are we doing to foster dialogue, learn from our dissenting colleagues, and build a path forward? How can we propose helping to unify the nation without our own house in order?





I think you might need to revisit some of the classes that Google gives us each year. It's important to embrace diversity, not just because it's morally correct, but because it builds a better business. If we have colleagues that support racism and do not support women's rights, learning from them is not a goal. Well, okay, learning what's wrong with them so we can better figure out how to fix it...

Chuck Simmons Nov 9, 5:23 PM



I have a hard time understanding what reasons someone could have for supporting Trump that override the fact that (1) the KKK supports Trump and (2) Trump has has said said hurtful and cruel things about Muslims, Mexicans, disabled folks, women, etc.

Kylia Miskell Nov 9, 5:28 PM



US-MTV- Nov 9, 4:06 PM

One theory about why all the polls and predictions were so wrong is because people supporting Trump were afraid to express their opinions for fear of retaliation. Is there anything Google can do to help achieve a world where nobody is afraid to voice their opinions



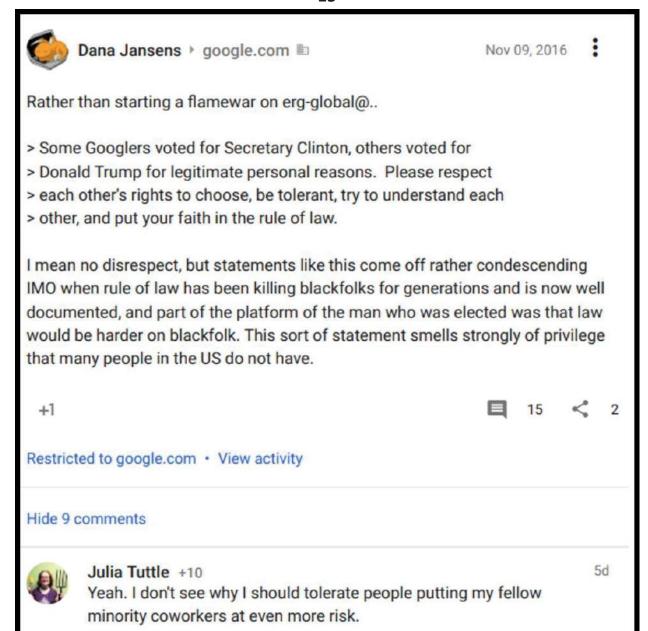


If their "opinion" is racism, why do they deserve to have their voices amplified?

Patrick Conner Nov 9, 4:11 PM







16



Salvatore Domenick Desiano (sdd) US-SBO-· Jan 31, 7:10 PM

Couldn't "working behind the scenes" legitimize a fascist regime? Equal Protection (amend. XIV) applies to all persons in America, not just citizens. If even one Googler has been materially affected by last week's order, don't we owe it to them to file or join and carry a case to the Supreme Court?

Context

https://docs.google.com/file/d/0B2GpLJyDTmjnUGN5WnVQSVVjV1U/edit?start=42m20s

http://scholarship.law.georgetown.edu/cgi/viewcontent.cgi?article=1302&context=facpub

http://money.cnn.com/2017/02/01/technology/apple-tim-cook-trump-travel-ban-legal-action/index.html





Just listened to this podcast today:

http://www.marketplace.org/2017/01/31/economy/make-me-smart-kai-and-molly/2-checks-andbalances-and-business

For more context...

Jef Hall Yesterday, 10:14 AM



+1. We work behind the scenes with business-friendly Republicans who might disagree with us on policy. We should not work behind the scenes with white supremacists like Steve Bannon.

Tim Chevalier Yesterday, 10:14 AM



+1000000

Kylia Miskell

Yesterday, 10:53 AM



Anonymous Feb 1, 9:51 AM :

Google is secular and pretty liberal. I'm also pretty secular and pretty liberal, but I have coworkers who are conservative or religious, and they've told me that they feel an overwhelming pressure to stay "in the closet" so to speak. Can you address this aspect of diversity and inclusion?



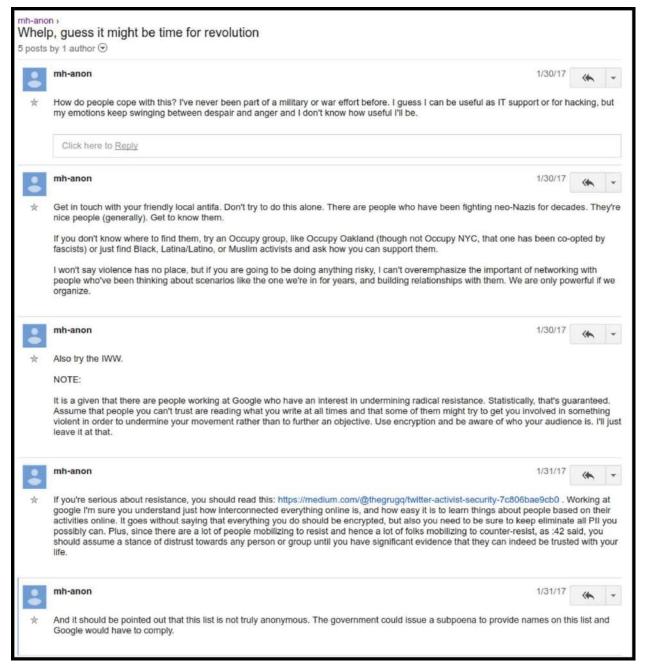
23



Diversity doesn't obligate us to include people who cannot include others themselves.

Tim Chevalier Feb 1, 9:59 AM

17





vkou

February 1, 2017, 10:31 AM PST

> But I'm just going to remind everyone that some of the people who work at Google voted for him, and support him.

Unfortunately, as we've seen over the past two weeks, this puts them at odds with basic human decency. If that's their political position, they have to live with it. If they don't like people calling a fascist what he is, that's their problem.

18



Jennifer Messerly > google.com

Aug 14, 2:10 PM

:

Reminder that sidetracking diversity efforts with complaints about "bias against anti-diversity beliefs" is harmful, to precisely the minority groups we're trying to make feel safe & included.

If we're going to have any success in creating a safe environment for minorities here, then we must reject anti-diversity beliefs/efforts.

If you need help letting go of those beliefs, there's a lot written inside the company about our diversity programs, how they work, what they're about, why they matter. There's also trainings to help: http://go/grow-inclusion



Jake McGuire +wac@google.com well said. We recognize people for improving the productivity of their coworkers. We should also recognize people for reducing the productivity of their coworkers through personal unpleasantness. By firing them if necessary.

12:49 PM +1

Let me say it loud and clear. I believe should absolutely be fired because he has made multiple statements that have made women (and men) uncomfortable, angry, and threatened.

This is not character assassination, it is highlighting bad behavior.

19



jaguilar

September 9, 2016, 12:19 PM PDT

This is the type of thing unsolicited feedback is made for. It wouldn't take much. Just, "Please see the contents of this ticket and consider promotion candidate's behavior on it. <Link>"



September 9, 2016, 10:42 PM PDT i hope you're not serious.



September 10, 2016, 2:58 PM PDT

yeah, he is. this happens all the time here.



harveynick@google.com

September 28, 2016, 6:31 AM PDT

Counter point: It is not possible to be a supporter of Donald Trump *and* to respect Google's actual diversity, as regards either race, gender or sexuality.

Furthermore he has shown to be a liar time and time again.

REPLY





Anthony Hadding > The only problem is that these things are very hard to prove, and these disputes, unfortunately, end up hurting the victim's career as well.

Google isn't the government. Proof of wrongdoing is not needed to fire anyone (in the US, at least).

Given that, I sometimes wonder if the optimal strategy is fire all those accused 100% of the time.

Consider two cases:

Case 1: The accused person did nothing wrong.

As long as you don't publicly out the person being fired (thus ruining their ability to get work elsewhere), any innocent person will be able to move to another company and will continue to have a wonderful career (since if you can get a job at Google, you can get a job anywhere). Awesome! You've actually hurt nobody!

Case 2: The accused person did something wrong.

Then we get rid of them. They do the same thing at their next company and are also fired immediately upon the first complaint. Eventually they run through all the places anyone would want to work and are finally unable to bother anyone, leaving the world a better place. Or they



Gregory Collins google.com - Aug 6, 2015

Boy is this exhausting.

> Many Googlers have claimed that it is "harassment" or some other rule violation to critique articles that push the Social Justice political agenda. A few Googlers have openly called for others to be fired over it. Do you support this viewpoint, and if so, can we add a clear statement of banned opinions to the employee handbook so that everybody knows what the ground rules are?

Short answer, speaking for myself: yes, the posting of this kind of "critique" -- and in fact, the posing of this very question itself -- directly contributes to the creation of a hostile work environment for women at this company. We are hemorrhaging good people because they don't want to put up with this crap anymore, and if it's a question of "social justice" (i.e. trying to ensure that everybody can feel comfortable working here regardless of their gender) vs. whatever-it-is-people-on-the-other-side-are, I definitely know who I want sticking around.

You can post to the Breitbart comment section at home on your own time. And if you feel like being asked to kindly not behave this way is censorship or that your rights are somehow being violated: perhaps everybody involved might be happier if you found some place to work where the culture is more in line with your values.

22



Alon Altman Yesterday 7:40 PM +1

+Amy Freestone I see your point about job security. To some degree, this is already the case with at-will employment. There are certain things that you can do that will get you fired immediately.

What other options do we have to ensure that jerks and people who do not respect their fellow employees don't stay employed here?



Amy Freestone Yesterday 7:48 PM

+Alon Altman That is true (and given my first job was in logs analysis, I was guite aware of that). However, such a thing would be unexpected and not a matter of course.



Liz Fong-Jones Yesterday 7:48 PM

+Alon Altman Easier paths to figuring out who those people are and terminating their employment.



Kim Burchett 9:22 AM +2
+Bridget Spitznagel I don't expect to change people's behavior. I do expect to have a place where others can see that their behavior is noted and not approved of. I expect the list will be useful to nooglers trying to decide which teams to join. I expect to use it to prod managers and directors and VPs into taking action within their teams. I may also use it to submit unsolicited peer feedback for anyone on the list, just to ensure that committees are aware of their behavior and take it into account when deciding whether to promote them.

+Fish Novosad I am considering this explicitly in order to counter the current approach, where HR considers everything behind closed doors, and unless someone's behavior is bad enough to warrant being fired, nobody else can tell that anything ever happened. That kind of silence suggests consent or indifference, which is very demoralizing.

23



Larry Lansing Jul 20, 2015

You've created a great honeypot. Log the usernames, forward to HR, let the firings continue until behavior improves. I don't want these people at my company.



Colin McMillen Apr 22, 2015 +42

"I'm struggling to understand why this keeps happening even though I understand why it keeps happening."

Because we don't fire enough people, that's why.



David Guild Apr 24, 2015

And yet we have a bunch of white males crying bloody murder over the suggestion that we slightly lower the hiring bar for women and minorities. No one is saying we'll *raise* the bar for them; it's not a zero-sum game and we already can't hire enough people.

This seems equivalent to your driving scenario, albeit with some signs flipped (i.e. helping more instead of harming less).

I think the unrealistic part of your scenario is where you say to group A,
"we're going to reward group B", and then you expect the members of A to
go "meh whatever". Robots would do that. People do *not* do that.

Works on	Moonshots
Summary	Product lead for early stage Google[x] projects and Rapid Eval.
	General manager of Foundry, early stage [x] projects.
	Talk to me if you're interested to join [x] in a PM or non-tech leadership role. Especially if you are a woman:)
	I don't have an open role at the moment, but always looking for good PMs
	(https://grow.googleplex.com/opportunity/job/7872017573)
	For an [x] talk or demo, go/iwantx



Nicolas Dumazet

3:12 AM Today

Selected text:

and we shouldn't leave men behind

I find it hard to read this without reacting very strongly. I suggest removing this completely, or rewording this significantly.

Being privileged, Men are not left behind. Like, ever. If you want a productive debate on this document, I suggest removing rethoric of this sort.

Reply Resolve



James Damore

Did you read my link? There are many ways in which men are left behind and education is an example where women get more degrees at every level.

3:45 AM Today



Nicolas Dumazet

Your source isn't relevant to my reaction. Do you understand why "we shouldn't leave men behind" is highly triggering? (I'm assuming that

"We'll never be a company that makes great products for everyone if we're not more reflective of the outside world. As I shared with my org, discussions on diversity can sometimes bring up ugly assumptions—from reverse discrimination to lowering the bar on talent—and that needs to stop. We work hard to hire incredibly smart people and it's not about our standards changing. Our efforts to make Google more diverse encompass everything from being more aware of biases, to shining a light on deserving talent and focusing on the leaders we already have, to expanding the pool of talent, and more. And it's not just up to minorities; we ALL have a role to play, and that goes for leadership too. "—Sridhar Ramaswamy

25

I believe this is what makes Slack, for example, so much more successful than us at hiring, say, black engineers in the US. Their CEO actually believes this matters for moral reasons. Meanwhile we worry about taking any action that might piss off the horde of racist and sexist people we've already hired - the people who feel nothing but apathy towards the blatant inequality that pervades our industry, yet erupt with passion when they feel their advantages being discounted.



Kim Burchett

google.com - Jun 29, 2015

Here's a suggestion from my wife: "I think only women and poc should be allowed to make hiring decisions at google for a year. And/or randomly assign a third of each position type to only be hired by women, poc, or unselected type. Look at the resulting hiring data. Google likes experiments? Do an experiment."

To make a measurable difference we need to make large changes, not just small tweaks. Some of what follows is my attempt to expand Google's <u>Overton window</u>, however most of it I think is quite practical.

Here are some big changes we could do

- We could make Atlanta a major office.
- We could start a policy of actively recruiting anyone in the top X% of their graduating class, regardless of school.
- We could hire people on the assumption that it's easier to learn to code at the level that Google requires than to learn to be smart/friendly/creative (this one isn't as crazy as it sounds -- I've actually had success using this approach at previous companies)
- We could make gender and race be explicit factors in hiring decisions (e.g. add a 0.2 bump to interview scores seen by the hiring committee). There are ways to do this without causing too much backlash.
- We could set representation targets that each SVP must achieve (either via hiring or attrition) or else forfeit 50% of their equity compensation.
- We could hire activists to tell us what to do. Hire everyone from Project Include, pay them well, give them staff and a project budget.
- We could open a trade school, where we accept the responsibility for teaching people
 how to code. Accept anyone from age 16 up. Locate it out in the middle of east
 brooklyn or east palo alto (and move it once the area gentrifies). Couple it with a
 guaranteed internship upon successful completion, and offer childcare. This would be
 like McDonald's deciding to start its own farms because it's not happy with the quality of
 the produce it's able to source.

26



A Google user Oct 15 2015, 12:13 PM

This week googlers were openly discussing retaliation against those who raise concerns about promotions based on sex (see g/men). People are afraid to speak out because of things like this. Is management doing





Today, 4:16 PM

anything to make googlers feel safe to raise such concerns?

The standard of hiring should be by merit and merit only, not by race, gender, age or any other non-merit related factors. Does the push towards diversity mean the hiring bar will be different for different ethical/gender/ago group of candidates? If that is the case, it is discrimination by nature.





I want to emphasize that, in relation to the original question, the hiring bar is already lower for men, for white people, for abled people, for people in their twenties and thirties, because of biases we all hold. Diversity efforts are to correct for these biases and ensure that everybody will be held to the same standards. Denying that these biases exist doesn't make them go away.

Tim Chevalier Today, 5:08 PM

27



Thomas Bushnell, BSG > google.com

Aug 6, 4:12 PM



h/t +Matthew Garrett for the link. See https://twitter.com/alicegoldfuss/status/894248580441030656.

I'm going to do my part to address this problem until recruiting comes up with a coherent strategy. I'm not perfect at it, but I'm going to try, and I would appreciate pointers to resources to take into account and things to be wary of.

From now on, I'm going to devote at least the first third of my 45 minute interview time to a discussion of experience with diversity. If the first fifteen minutes doesn't satisfy me, I'll continue the discussion. If need be, it will take forty-five minutes.

I would encourage others to do the same. Judging "googliness" by a vague gestalt with no deliberate attention to such things is inadequate. We need to consciously ask and make it clear that this is part of what we care about.



1





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Urs Hölzle

m google.com - 11:46 AM

I just sent out an email congratulating TI's newest directors and principal engineers, and 10 out of 10 are male. While I am happy for all those promoted, I am unhappy with this ratio — my VPs and I know that it's on us to identify talented women and help them grow into leaders. Overall, in TI, women were promoted at a slightly higher rate than men in this round, so I know we don't have a systemic problem. And we're working on the pipeline; for example, we have a leadership development program targeted at senior women engineers (more to come on this soon), which started in TI and which other PAs are now adopting as well. But I wanted to be upfront with this post and say: yes, I noticed that too.

-- the email --

Huge congrats to everyone who got promoted in this round and to our ten newest Directors and Principal Engineers!

Once more, we've attempted to squeeze their tremendous achievements into just ten words. This doesn't really capture the impact these folks are making on Google's success. They all used their deep expertise to solve a big challenge—whether it was getting various pieces of our infrastructure ready for the cloud and the web of the future, keeping Google safe, or making networks much more testable. And in order to get this done they all had to develop and enable their teams and work collaboratively across organizations.

Why not take this as a good moment to step back and think of your own personal work and how you can make your 'customers' happy, whether they're internal or external. I can't promise that it'll result in a promotion but it'll be deeply satisfying. Rinse and repeat :-)

-Urs

29

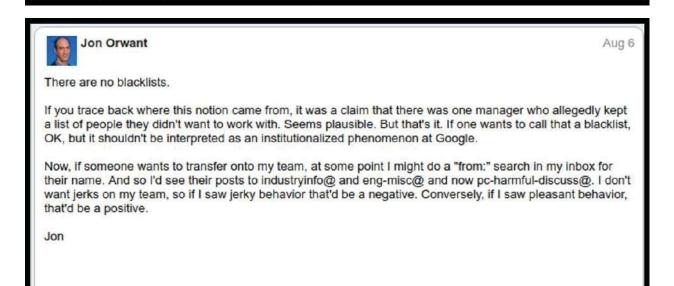




Bruce Murphy Aug 24, 2015 +5

You appear to be confusing "not permitted to talk about diversity" with "people increasingly getting irritated that you derail constructive discussions of fixing bias by jumping up and down and shouting repeatedly asking 'what about the hypothetical anti white male bias' and then claiming sexism when this is pointed out."

Is there any chance you could stop doing that?



30



Urs Hölzle ► google.com III

May 10, 2016

I'd like to comment on a pattern I frequently see in internal discussions, where things go off the rails because (well intentioned, usually) engineers (always) want to "examine the facts" or debate the "exact goals". A recent example is below, screenshot only since it's been deleted in the meantime.

As engineers we're trained to pay attention to the details, think logically, challenge assumptions that may be incorrect (or just fuzzy), and so on. These all are excellent tools for technical discussions. But they can be terrible tools for discussions around race, discrimination, justice, and so on, because these discussions touch topics with a high cultural and emotional content. That's because questioning the exact details can easily be perceived as questioning the overall validity of the effort, or the veracity of a historical context.

In these situations, determining the exact truth can often be counterproductive because it is situationally inappropriate. I.e., debating a point may be fine in one context but totally inappropriate in a different context.

Let me illustrate this with a contrived example. Suppose you're attending someone's funeral. Everyone's emotional, and several people give eulogies praising the deceased. Suppose that one of the speakers mentions how great a parent the person was, and suppose you know for a fact (100% demonstrable, documented, etc) that this is not correct. What would the reaction be if you got up and said "wait a second, that's not quite true, in this particular situation back in 2012 they weren't really a great parent"? It's highly likely that the reaction of the audience will be independent of the correctness of your statement. Everyone would be upset because it's simply the wrong place, and the wrong time, to debate the exact details of the past. The goal of the funeral is to celebrate the person, and to help family and friends come to terms with the fact that they are gone. In a different context (say, a court case) the exact statement could have been welcome, but here it is not - and it's not a subtle call, it's obviously inappropriate.

So before you post on a thread, think about the larger context, and whether your question is appropriate in the context of the thread. For example, the question below clearly is inappropriate because it has a high probability of being interpreted as "these diversity efforts are questionable" (even more so since the question clearly is rhetorical).

And just as a reminder, when you see something that you feel is off, report it at go/saysomething. We don't expect everyone to be skilled at intervening themselves, but we do expect you to report it so someone else can.

[also available as a doc at go/why-discussion-context-matters]

I'm also interested in the answer to this question. The white majority in the US (63.7% Non-Hispanic White https://en.wikipedia.org/wiki/Demography of the United States) is underrepresented in Google (60% White employees overall). If we want to achieve racial mixup to mimic the country then we should also hire more whites. Is that one of the goals of diversity effort?

31

I'm very glad that at Google we do our very best to make sure everyone feels included and that everyone can "bring their whole self" to the office. Not only is this a noble goal, but it's the right thing to do. I heard at TGIF that some conservatives (i.e. people who hold conservative political beliefs) don't feel comfortable expressing their political beliefs at the office. At first I was saddened by this, since it's a sign of how divided our society has become. But then I realized something:

Throughout the entire election campaign, one side has not only sought to divide, but has used hatred and blatant racism to get ahead. Donald Trump has publicly stated, among many other things:

- Mexicans are rapists and murderers
- Muslims should be banned from entering the US
- Refused to condemn white supremacists who were campaigning for him
- Promoted violence against people, such as black lives matter protesters, who have views different than him

Unfortunately, when you vote for or nominate a candidate, you vote for the entire package. You can't support Donald Trump without also supporting his racism, misogyny, homophobia, and transphobia. Or even worse, if you vote for Donald Trump because of his economic policy or because you feel the other party is corrupt, then what you're saying is that economics is more important than the safety of your peers.

This is where my tolerance ends: with intolerance. You can't support someone who sows seeds of intolerance, and then complain that people aren't tolerating you. You need to decide, does tolerance matter? Because if it does, then the things that Trump said during the campaign and his nomination should have been dealbreakers for you. If not, then I'm sorry but you can't claim to want to be included while excluding others.

32



Adam Fletcher

google.com - Aug 4, 2015

While Google appears to be doing very little to quell the hostile voices that exist inside the company, I want those hostile voices to know:

- * I will never, ever hire/transfer you onto my team. Ever. I don't care if you are perfect fit or technically excellent or whatever.
- * I will actively not work with you, even to the point where your team or product is impacted by this decision. I'll communicate why to your manager if it comes up.
- * You're being blacklisted by people at companies outside of Google. You might not have been aware of this, but people know, people talk. There are *always* social consequences.



Urs Hölzle → google.com 101

Aug 6, 2017

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Yesterday I came back from a week of internet- and cell-free vacation into modem-speed land, and was dismayed to see the news about "the document". Needless to say, I completely disagree with it, and I find it deeply offensive.

In many ways it reminds me of other discussions (e.g., about evolution), in that it argues a position that will be obsoleted by history. And I hope that we'll all pitch in to create that future, soon.

As an optimist, the one positive outcome is the overwhelming support for an inclusive workplace that it provoked. As a realist, I am saddened that the hurtful statements in this document have been written at Google. Still, if there was any question about the direction we're heading in, I hope the strong reaction by Googlers settles it -- there's no path back to a past where it's ok to judge people by their gender or identity. No way.

33



Paul Cowan

google.com - Aug 7, 2015

OK, part II of my diversity-themed rants for the day.

There's a common thread I've seen in many diversity-related discussions^Wshitshows. This is the repeated claim that people can't be punished, or shamed, for expressing an opinion. I've seen "freedom of speech" invoked more than once.

Any argument about where "freedom of speech" starts and ends (the old "fire in a crowded theatre" argument) aside: please understand that freedom of speech is the right to freely express an opinion. It is most assuredly **not** the right to express an opinion with freedom from the consequences.

The fact that you have a *right* to express a dunderheaded opinion does not mean you have the right to demand that everyone continues to respect you, to pay attention to you, to listen to you, or even to treat you without contempt. It is as much someone's right to judge you (rightly or wrongly) for your opinion as it is yours to express it.

This applies regardless of the opinion. If you express a dunderheaded opinion about religion, about politics, or about "social justice", it turns out I am allowed to think you're a halfwit. In some cases, I cannot act on my thinking (I generally can't fire you for thinking something I don't think about religion), but I'm perfectly within my rights to mentally categorize you in my dickhead box.

To make this more specifically about recent events: I saw a thread recently (which, alas, I cannot find right now) in which someone described the (my words, not theirs) "SJW cabal", and (horror of horrors) used words very like "some of them have even talked about having a list of people they won't work with".

To be clear: this is, in my opinion, perfectly acceptable. Quoting this as if it were some egregious abuse of power, or of your rights, is laughable. Everyone in this company has a right to work in an environment which makes them happy and comfortable. Yes, I maintain (mentally, and not (yet) publicly) such a list. If I had to work with people on this list, I would refuse, and try to get them removed; or I would change teams; or I would quit. My life, happiness, and mental health, are worth too much to me to burn my precious happy-fu working with people I find contemptible, unpleasant, or even in some cases merely irritating.

Like +Collin Winter (see

https://plus.google.com/113930769093822119546/posts/DoPXTit8Si9?e=-RedirectToSandbox), I do, and will continue to, maintain such a list.

Sadly, my list grew larger by quite a bit this week.

But I take comfort in one thing: my list of people I'm proud and delighted to work with grew by even more. So, on average: thanks, everyone.



35



Collin Winter

p google.com - Aug 6, 2015

One of the great things about Google's internal communication mechanisms (G+, mailing lists, etc), is that, as a manager, I can easily go find out if I really want to work with you. When we're chatting for 30 minutes because you want to join my team, you're going to be on your best behaviour; if that's masking a stream of G+ rants belittling your coworkers, I'm going to find out.

I keep a written blacklist of people whom I will never allow on or near my team, based on how they view and treat their coworkers. That blacklist got a little longer today.



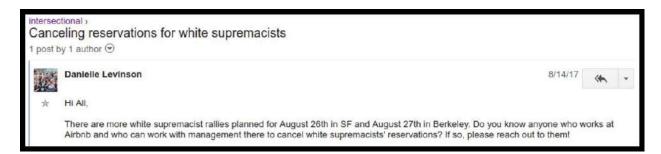














I have a further thought on this, and I know I'm violating Godwin's Law by saying it: during the 1930s and 1940s IBM collaborated closely with the Nazis on the information systems that underpinned the Nazis' ability to execute the Holocaust. Do we want to similarly enable the current US administration?

https://en.wikipedia.org/wiki/IBM_and_the_Holocaust

Mar 9, 9:28 AM

36



Jay Gengelbach > google.com

Jan 7, 5:58 PM

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...

And here, I'm a little disappointed with how Google and other big companies behave. This company does a *criminal background check* on its employees—but do we look around for patterns of harassment? Do we pass on information from our HR investigations to companies that call us for a reference? All we've said publicly about James Damore or any similar case is that we can confirm that they've been terminated. My understanding is that in reference calls, managers are encouraged *not to say anything negative* about former employees.

I believe there's a lawyercatly reason underpinning this. Sharing details about someone's termination can be construed as defamation, and limiting their future employment prospects would be damages that could potentially be recovered in a defamation lawsuit. But to that, I say: SO WHAT? Google doesn't move on any such cases without substantial evidence. 'Truth' is a defense to defamation claims, and although it costs money to defend them, I'd hope that this mattered enough to us that we were willing to put some money on the line for it. And I don't think a lot of offenders would be interested in stepping into court to publicly face whatever evidence we have against them that led to our terminating them. If we really care about diversity in tech, we don't just need to chase serial offenders out of Google, we need to discourage them all throughout the industry. We should be willing to give a wink and a nod to other Silicon Valley employers over terminable offenses, not send the worst parts of tech packing with a smile and 3 years of employment at Google on their resumes. We should be working with our victims to say "We have all this documentation of this case, and we're happy to refer it onward to Mountain View Police Department if you'd like," so the worst of these things show up in those criminal background checks that big companies like to do.

We need to be the end of the line for serial offenders-not just another stop on their spree of misery. "Catch and release" is not an OK orientation towards people who make tech toxic. We should be leading an alliance of big tech companies who are willing to take a stand on erasing abuse from tech, and willing to take risks to do so. Silence is a part of rape culture. We shouldn't be a part of it.

Anti-conservative postings

37

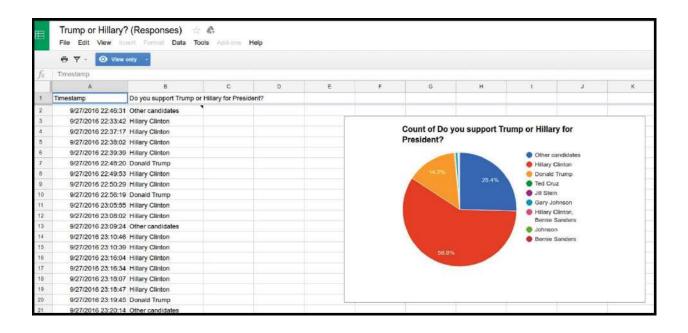


Jay Laefer +2

+1

I haven't looked at g/politics in quite a few months, so I don't know how bad that's been. The worst stuff I read recently is at g/freespeech.

Back in August 2015, I reported some of the worst g/freespeech posts to leadership. I hadn't realized it's been a year and a half since then, and some of the recent posts are far worse. However, I don't have enough emotional energy right now to dig through and report my recent concerns. I'll try to make some time this week. The posts aren't going anywhere, unfortunately.





Anthony Baxter ➤ google.com IIII

Aug 5, 6:44 AM

Funny story when I posted a (somewhat exaggerated) anti Nazi G+ post I was told to delete it yet this latest is ok.

That Piece is all good and fine, apparently. I merely suggested that punching nazis had a fine tradition of well all of the twentieth century. That was too much, yet this stuff is OK? Get serious. Everyone involved in that "I'm a pathetic man baby who is unable to deal with the modern world" needs to get in the bin.

Google HR - don't be mean to actual Nazis they are valued coworkers. Me::They're Nazis. No.

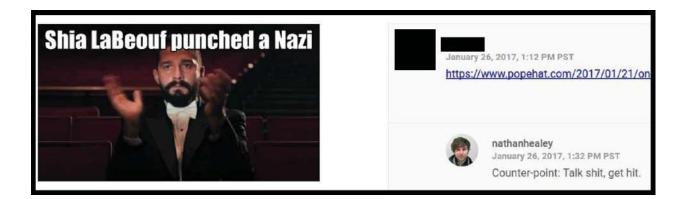
I will absolutely go out of my way to make sure I never work near anyone involved with or who endorsed that garbage. Because Nazis.

And you should absolutely punch Nazis.





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Matthew Montgomery +8

We went to war over this shit. We did not set up a roundtable with Churchill, FDR, Stalin, Mussolini, Hitler, et al. We killed Nazis until the Nazis stopped. Why? Nazis wouldn't stop until it became clear that they could not win, and it is the ONLY reason they stopped, because they were utterly defeated. With large scale violence, killing thousands of humans and destroying billions of dollars worth of property. THAT was the only language they understood. Anything else, you'll recall, was branded as appeasement. I'm pretty sure we know that's ~objectively bad.

To paraphrase MLK, punching a Nazi is the language of the oppressed. MLK was pretty clear that you need BOTH the threat of violent and non-violent resistance for the latter to be an effective threat. MLK refused to condemn the more violent elements of the civil rights era despite repeated calls because without that threat, they'll just keep killing you.

This is why I refuse to condemn rioters, or punching Nazis. This is targeted, political, *defensive* violence. It's what happens when you leave otherwise nonviolent people with no other choice, and it's what happens when a movement ignores everything else: facts, reason, morality, empathy, justice, fairness, whatever.

This is not an ideological debate, full stop, period. We are in a failure mode of democracy. This is literally, in every respect, a power struggle. It's a struggle over who gets to set the rules of society, who has the power to determine facts and morality. It's best we dispense with any illusions otherwise.

So let some black bloc guy punch a Nazi, and let the world point and laugh. Let it be symbolic and let all the Nazis fear. And then repeat after me: this is not normal. This is not normal.

40



Rachel Blum (corpsified) +5

If you subscribe to an ideology that, as a matter of fact, wants to kill people because they are different - and has, by the millions - then you deserve being punched in the face. Repeatedly.

And if I ever subscribe to an ideology like that, please punch me in the face as well. By all means.



Lee S

My problem with Breitbart isn't that I disagree with them. Its that they're objectively pro-Nazi.



Tim Chevalier → google.com 🗎

Aug 25, 2017

'i'm a queer-ass nonbinary trans person that is fucking sick and tired of being told to open a dialogue with people who want me dead

we are at a point where the dialogue we need to be having with these people is "if you keep talking about this shit, i will hurt you"

we are beyond the point of ~opening dialogue to win hearts and minds~

we are at the point where the only way to change people's minds is to make being a fucking nazi have consequences'

- Nora Reed



Torrey Hoffman ▶ google.com IIII

Aug 21, 2017

Also in the mood to punch Nazis, but none within punching distance.

Originally shared by Chris Conway

I'm in a mood to punch some Nazis but there are no Nazis currently within punching distance, so... instead I'm going to match up to \$5,000 in donations to the following organizations that are fighting the good fight.

- National Immigration Law Center (https://www.nilc.org)
- Southern Poverty Law Center (https://www.splcenter.org)
- Transgender Law Center (https://transgenderlawcenter.org)



42

Why We Fight: Frequently Asked Questions

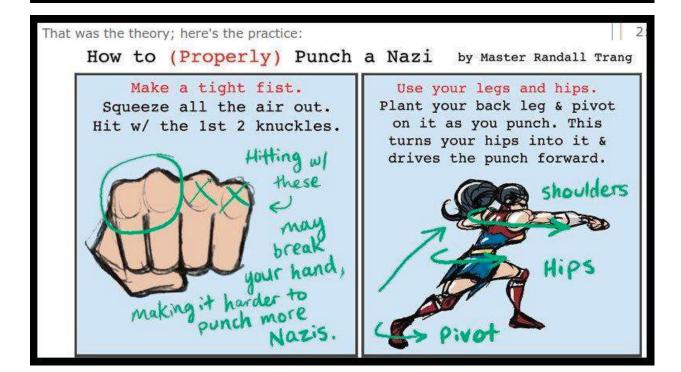


Feb. 6th, 2017 09:39 am

I used to be a pacifist. It's easy to be one when you aren't being attacked.

Large-scale violence always starts with ideas and rhetoric, because rhetoric eases organizing and large-scale violence requires the consent and participation of many people. How do you let people know you don't take their ideas seriously? How do you defend yourself against ideas that can only cause harm to you? Communicating that you will refuse to listen is one way, but it doesn't scale. No-platforming powerful fascists does scale. So does punching one on camera.

Here's a FAQ list of things people have asked me -- or, in some cases, things they would have asked me if they had thought to ask rather than assuming an answer -- about why I think fascism must be stopped by any means necessary.



43

2. Okay, sure, I accept that definition of "fascism". But Trump isn't a fascist, is he?

Yes, he is -- not because I disagree with Trump (I'm not sure Trump has a coherent enough ideology for the word "disagree" to denote much, though Steve Bannon certainly does), but because he fits the definition of "fascist." Quoting Emily Gorcenski again:

So let's look at how we're using the term today. Is the modern GOP a fascist party? Is Trump? His supporters?

Trump won with the minority popular vote. So there's that. He's controlling narratives away from negative views of his party.

His policies involve cutting off resources for marginalized communities. His supporters call anyone not a white man a "snowflake."

His rise to power was strongly aided by technology. He wants to march tanks through DC in a show of military might.

He has a singular focus on restoring manufacturing jobs to the US at the expense of other services.

And he and his team regularly harp about "unity" and patriotism.

So yes, Trump is a fascist and his team promotes fascism.

Not because I disagree with them, but because actions align with fascist policy.

If you talk like a fascist and you act like a fascist and you govern like a fascist, you're probably a fascist.

[...]

TLDR: fascism requires mandatory unity for strengthening the state and isn't about dismissing speech or dissent.

3. Well, okay, maybe he's a fascist, but the people elected him, so don't you have to accept him as our leader?

No. Donald Trump exploited a loophole in the Constitution in order to take over the government. Voting in the US is based on the electoral college because the founders foresaw that the popular vote might result in the election of an incompetent leader. They thought that the job of president was too important to entrust directly to the majority. They wrote the electoral college into the

44

Fine, there might be a few bad guys we can't convince, but surely the majority will see they're wrong.

History suggests otherwise. As Rachel Stark points out (read the whole thread), no-platforming is the only effective defense against fascists because the wrongness of their position is not obvious -- over time, fascists have adapted and found ways to re-brand themselves that bypass people's defenses, much like popup ads that make it past your ad blocker. Ideally no-platforming would be done peacefully, and it usually is, but sometimes peaceful methods fail, and punching a Nazi if it prevents genocide is a moral imperative.

So I am 100% pro punching Nazis & tired of hearing this debated, but I wonder if folks realize WHY anti-fascists punched that Nazi.

We don't punch Nazis out of anger (though we are mad), or to change their minds (they don't want to change)...

We don't even punch Nazis because it feels good (though it feels SO good).

A central Antifa (anti-fascist) principle is that fascists CANNOT be allowed to have a platform.



Tim Chevalier → google.com list

Feb 2, 2017

Trying to "work behind the scenes" with the Trump regime means trying to work with white supremacists and make compromises with them. Is that what we want Google to do?



Tim Chevalier ▶ google.com lin

Mar 13, 2017

Steve King, a Republican member of the House of Representatives, used Twitter to call for ethnic cleansing.

How much more evidence do you need that the Republican party is openly advocating for white nationalism in 2017? No, not every Republican member of Congress is saying this – nor are they taking out their trash.



46



Aug 29, 2017

[Trying a public post here; I won't hesitate to disable comments if necessary.]

[CW: domestic violence]

Thread from @quicksilvre on Twitter:

'Thinking about the trend of trying to explain away antifascist violence as "random." It's anything but random. It's very precisely targeted

There is literally only one reason an antifascist would be violent towards you: you are a fascist

I mean, human beings are human beings and we're complex and we never only have one reason for doing **anything** but still

People don't commit antifascist violence except in response to fascist violence. Antifascists are not roaming, looking for punching targets

Antifascists are showing up where proud fascists are making public displays of force and making their own public displays of force.

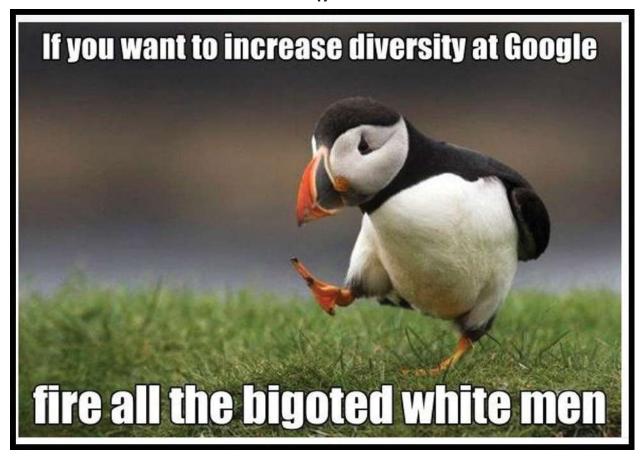
If you don't want to get punched by an antifascist, it's simple: don't go to white supremacist rallies and don't own white power symbols

It's not ~oppression~ if you can't be out & proud about your belief that white people are just ~better~ without the risk of being punched

Getting punched for participating in a white supremacist rally is not oppression, it's reasonable social consequences

Not being able to express your belief that groups of people are "lesser" & should be done away with without facing violence isn't oppression

It's **perfectly reasonable** to expect a violent response to the expression of hate speech because hate speech **is itself violence**





Bruce Murphy Aug 4, 2015 +3

Maybe a clamour would work better than surgical intervention, but I just forsee endless escalation between honest decent folks and the defenders of the hypothetical oppressed white male until HR steps in and fires everybody.

Have we actually triend non-self-directed adjustment? (Warnings don't count, there's no specific outcome)

The only way we "move past color" in America is for white people to shut up and listen. And yes, it means people used to be in the spotlight (I'm looking at you, Justin) need to step back and quietly build a stage for others to speak. That's allyship, which is Justin's only role in this.

48

 If you are white/male/heterosexual/[insert majority group here], there are times to just shut up and listen. Try for some empathy. You'll learn a lot.



Jon Klem Jan 21, 2015 +1

Every time I'm reminded of the travails of Kathy Sierra it makes me want to pound a brogrammer in the face.

#countingtoten







Asfandyar Qureshi > google.com

Nov 14, 2016

"I am a white male and I am sick and tired of being demonized and blamed for society's ills. I am sick and tired of my race and gender being the target of real, honest hate (e.g., ""#killallmen"") that society would not tolerate if directed at other groups"

A Googler explaining why he voted for Trump (doc link at end). The more I learn about Googlers outside my immediate circles, the less I want to be anywhere near them.

This is so disconnected from reality I don't even know what to say. Most "real,



Paul Cowan

google.com - 6:20 PM

It's good to be periodically reminded, given how popular Dilbert is amongst us geekfolk, that the creator of *Dilbert* is (among other things) a paranoid sexist dickbag.



Burcu Dogan

ngoogle.com - Mar 10, 2015

Google, STOP THIS NONSENSE!

There are numerous sexual abuse and harassment cases going on at Google. All internal G+ threads I have skimmed through were dominated by men debating about false accusations and their legal implications.

We can't address the harassment issue, because you want to keep harassing us. You want to offend us. You want to ignore us. You want to ignore our issues and stick back to your daily masturbation about your manly problems. Any woman who is questioning the status quo is reacting over-sensitively, should be a drama queen or seeking for possibilities to damage a powerful man's career. This is how your brain works.

Being disturbed by your arrogance and annoyance, I don't feel safe at Google anymore.

+24







Chloe Stevens

google.com - Apr 24, 2015

If you read one post today, read this one.

**** originally shared:

A coworker quit. In her parting letter, she felt the company was a toxic environment, inferred as bad for diversity employees.

Read more (155 lines)

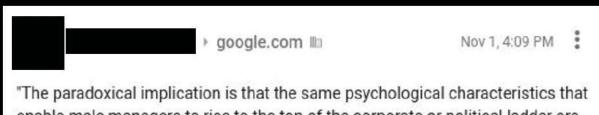


Straight White Male: The Lowest Difficulty Setting There Is | Whatever

whatever.scalzi.com

I've been thinking of a way to explain to straight white men how life works for them, without invoking the dreaded word "privilege," to which they react like vampires being fed a garlic tart at high noon. It's not that the





enable male managers to rise to the top of the corporate or political ladder are actually responsible for their downfall. In other words, what it takes to get the job is not just different from, but also the reverse of, what it takes to do the job well"

Why Do So Many Incompetent Men Become Leaders?

Harvard usiness Review

hbr.org







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3) By being a white male you are in a privileged class that is actively harmful to others, whether you like it or not. So no, you really actually don't get to complain about your right to an opinion. You are in a position of power, be mindful of that.





9/30/15

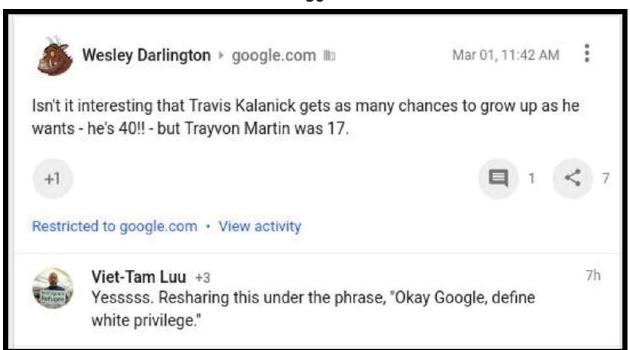
I hate when industryinfo takes important issues and devolves into argueing about minuta and misses the big picture. No matter who was invited by Google, there would have been a non-inconsequential amount of vitriol just because they were women standing up for a feminist cause.

Maybe to the small population of people who know the details of gamer-gate, the invite list is problematic. For the vast majority of Americans (the ones who have never heard of gamer-gate), the fact that this program exists is a good thing. These women are qualified to speak to online harassment, regardless of their perceived tactics.

Just going to put this here and quote John Oliver- "If you're thinking that doesn't seem like that big of a problem, congratulations on your white penis".









57



Scott Bruceheart

■ google.com - Oct 13, 2015

Dear all the boys: do not put the burden of relieving your systematic misogynistic discrimination on women.

Dear all the white people: do not put the burden of relieving your systematic racist discrimination on the people that aren't white.

It is not the responsibility of the victim to end the victimization. It is the responsibility of the victimizer to stop being terrible.













42 comments

Oct 13, 2015 +2

Please don't put "all the boys", "all the white people", or any other entire demographic into the "victimizer" bucket. It is not the responsibility of everyone who kinda looks like the person who committed an offense to right



Manuel Klimek Oct 13, 2015 +5

- it is the responsibility of the privileged to end the privilege though. Nobody else can.



Scott Bruceheart Oct 13, 2015 +4 +1

Reply |

I'll just leave this here: http://goodmenproject.com/featured-content/whitefragility-and-the-rules-of-engagement-twlm/



Antonio D'souza ▶ google.com >

Jul 11, 2017



From Y@G:

"I (a white Googler), in an attempt to build rapport with a Black Noogler and demonstrate my lack of ignorance of Black History, ended up whitesplaining Black History to him...thereby demonstrating my ignorance of Black History in the process. A few minutes later, feeling like a complete idiot, I went back to him and apologized for whitesplaining"

First time I've seen a mea-culpa submission. Would be nice to see more demonstrations of self-awareness.

If you didn't understand / were offended when that guy said that white men had to do some research and read about privilege

you should really do some research and read about privilege (and also attend a bias busting session).



Liz Fong-Jones > google.com

Aug 14, 9:53 AM

:

This is a pretty good article about the "walking on eggshells" effect as **actually experienced** by people of color – of being afraid to point out racial stressors for fear of being lumped as "over-sensitive", and of needing to phrase things to be palatable and not trigger defensiveness.

The Sugarcoated Language Of White Fragility

Cause of Racial Stress	Effect on Aspect of White Identity
Suggesting that a White person's viewpoint comes from a racialized frame of reference	Challenge to objectivity
People of color talking directly about their own racial perspectives	Challenge to White taboos on talking openly about race
People of color choosing not to protect the racial feelings of white people in regards to race	Challenge to White racial expectations and need/entitlement to racial comfort
People of color not being willing to tell their stories or answer questions about their racial experiences	Challenge to the expectation that people of color will serve White people



David Seidman

10:12 AM Today ▼

Selected text:

The male gender role is currently inflexible

This is partially incorrect. Male gender roles are an active area of study and activism. See "toxic masculinity"

https://en.wikipedia.org/wiki/Toxic_masculinity

Reply - Resolve



Asfandyar Qureshi

google.com - 12:29 PM

The article works just as well if you replace 'white' with 'male'.

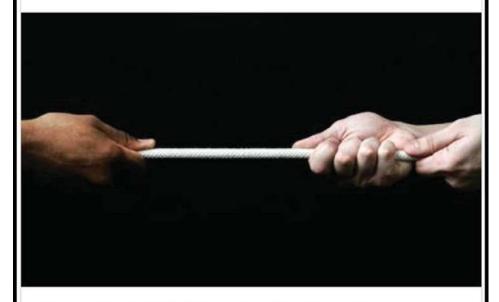
"How dare you suggest that I could have said or done something racist!" ... Outrage is often followed by righteous indignation about the manner in which the feedback was given.

Derailing and tone policing... it's comical how often those happen in these discussions. Exemplified by the second comment on Kim's post, which is about why 'racism' is an inappropriate word for "structural oppression".

(Turning comments off, because I have work to do.)
Show less

Kim Burchett originally shared:

"I write and teach about what it means to be white in a society that proclaims race meaningless, yet remains deeply divided by race. A Read more



White Fragility and the Rules of Engagement - goodmenproject.com



Bridget Spitznagel

google.com - 9:50 AM

attn. BGN allies (i.e. white folks), this is relevant to your interests https://compassionateactivism.leadpages.co/workshop-healingwhiteness/

This external talk will be recorded but you have to register to get the future recording. The problem that it is meant to solve is: "many white folks [who want to help] don't know where to start and feel overwhelmed by the emotions that begin to arise - whether that's feeling frozen with guilt, powerless to make a difference, or defensive about the idea that racism is a factor."

I think this problem does come up here a lot and this talk may be more effective than reading drsprite posts;) (IDK, I haven't seen it.)

Show less

Healing from Toxic Whiteness to Better Fight for Racial Justice

A FREE Online Workshop By Everyday Feminism September 15, 2016

Healing from Toxic Whiteness compassionateactivism.leadpages.co



Dave Burke ▶ google.com IIIa

Aug 7, 12:30 PM

.

Taking a quick pause from my vacation over in Ireland. Like most of you, I've read the document (and indeed can't miss it given the press coverage).

If you haven't seen these already, I strongly recommend reading Yonatan Zanger's (https://medium.com/@yonatanzunger/so-about-this-googlers-manifesto-1e3773ed1788) and Mike Cleron's (https://plus.google.com/100250496237307976234/posts/L8b6XiLXi2H) rebuttals. They nail it.

But above all else, if you're on my team, or work with my team, and were as dismayed and frustrated as I was reading this document, I feel compelled to let you know 3 things:

1/3: I will not stand for this BS.

2/3: I am more committed than ever to an inclusive and diverse team.

3/3: We have your back.







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Angelica Inguanzo (inguanzo) US-SBO- Today, 4:13 PM

As engineers it is expected that we provide interviews to prospective Googlers, how can we better ensure that people with these bias aren't part of the interviewing process moving forward. It makes me uncomfortable that the group of people that "supported" his doc should continue to participate.





Simon Howard (fra) US-CAM- Today, 3:38 PM

Meta-request: There are a lot of questions from men on this Dory. Will you ensure that questions from women are given equal time during this Town Hall?





Heather Young (heatheryoung) 59 minutes ago US-KIR-

The author was not alone in his views: 175+ people agreed to some degree before the poll was taken down (and leaked). They -and others like themwork among us, and may be managers, on hiring/promo committees, etc. What is being done to understand the true scope of this cancer within our culture?



Paul Cowan ▶ google.com Ilia

Aug 5, 4:23 PM

:

YES

Originally shared by Tanya Reilly

God, please let our inevitable public statement be less toothless than that internal mail. We need to say "Wow, that was some bullshit right there. We've fired that guy [into the sun], and updated our code of conduct to say not to do anything that looks even a bit like that, ever. Also, we're looking at how we can change our interview processes to notice toxic opinions like that, because seriously, wtf, where did that come from? Sorry everyone, that must have been exhausting. It was for us too."

Healthy debate.

Come on.



Andy Carrel (wac) ▶ google.com III

Aug 8, 1:34 PM

:

Completely unsurprised that my " gmail label, which I use to avoid interactions with toxic Googlers that we apparently do not want to terminate, is filled with posts attempting to defend that doc. It makes me wish we had an internal blocktogether equivalent.



Bryan Klimt → google.com IIII

Aug 5, 8:56 AM

:

I'm on vacation and ignoring work stuff, but the bullshit is seeping into the public internets today. So I came here to say something. If you think women are inherently less capable of coding, leading, etc – please leave. If you don't respect Google's values of diversity and inclusion, quit. Frankly, you're lucky I'm not in a position to fire you.

65



Collin Winter ➤ google.com III

Aug 7, 9:03 AM

:

So, That Doc.

I'm thrilled that you don't feel comfortable expressing these views at Google. I'm excited that you can't question the humanity and basic value of your coworkers without worrying about blowback. I'm happy that publicly undermining the people around you might carry some consequences.

I'm happy that treating people with respect has become table stakes. I'm happy that Googlers have reacted like a body to an infection, surrounding and isolating, trying to contain the damage, to limit how many people your pseudo-scientific racism and sexism can burt.

Because this is an infection, and this is actively hurting people. How could it not?

Because this isn't an intellectual exercise. This isn't taxes, or infrastructure spending, or foreign policy; this isn't an area for dispassionate discussion, where we can bat around different ideas over lunch.

This is an attack on people as people, on people's humanity, on people's employment, security, on their place in the world. On their fundamental value as human beings.

And that is why there can be no "healthy debate". No one should have to debate their own humanity or the terms of their own existence. The very idea is demeaning and degrading.

There will be no debate, there will be no discussion. The matter is settled. You lost.



Trevor Schroeder > google.com

Aug 7, 10:27 AM

I just realized something very liberating because it's been a question I've been struggling with.

Even in the event we would hesitate to dismiss a person for espousing repugnant opinions, if nobody is willing to work with them then they cannot be a part of a team and cannot be retained.







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Benjamin Treynor Sloss > google.com III

Aug 7, 7:19 PM

:

[CONFIDENTIAL - DO NOT FORWARD OUTSIDE GOOGLE]

Team, all,

To the many inquiries I've received: YES.

Yes, I've seen the 'Echo Chamber' doc;

Yes, I personally deeply disagree with much of its content and insinuations; Yes, it shows that bias is alive and well in the minds of at least a few we've hired; Yes, I remain resolute that bias and discrimination have no place in my team, just as they have no place at Google.

and finally,

Yes, I will continue to work to ensure that bias at Google - whether stated baldly, or concealed - is rendered powerless through our practices, our systems, and the unflagging attention of [the vast majority of] our people.

-Ben



2





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Meredith Whittaker > google.com IIII

Aug 8, 9:19 PM

:

I think it's critically important that we discuss the steps women and minorities at Google should take when faced with colleagues who openly supported the views in the doc. This is a functional workplace, and many are already dealing with this question and the anxiety that comes with it.

To this end, I ask those who agree to amplify:

https://dory.googleplex.com/series/100897204/submissions/100897487



Meredith Whittaker (meredithrachel)
US-NYC 3 minutes ago

:

What should women and minorities at Google do if someone who openly supported the doc is transferred to their team, or added as a perf reviewer, or becomes their manager?



0



Patrick Jones > google.com IIII

Aug 8, 2017

:

I could say lots of things, but other people have said them much better than me. So I'll just say, fuck those opinions, and fuck people who think it's OK to have them.



Rick Klau ▶ google.com III

Aug 7, 1:36 PM

:

The-Document-That-Shall-Not-Be-Linked (TDTSNBL) is wrong. I'd say it is comically mis-informed, but there's nothing about it that's funny. The author does a fantastic job convincing me that I'd never work with him, never encourage anyone to hire him, and will now re-double my efforts to ensure that those around me understand that anyone holding such views has no place on any team I'm a part of.

One last point: the staggering lack of empathy, the implicit assumption in TDTSNBL that it's **his** safety that must be prioritized over those who are not like him, **his** views that must be respected above others... He's not trying to help Google, he shows no interest in leveraging the skills of those around him. He's just trying to protect his own sense of superiority relative to everyone else.

To the thousands of women who share their talents with Google, thank you. I value you, I respect you, I see you.

To the men at Google who don't agree with the author of TDTSNBL, let this moment shine a light on the shit that those women confront day in and day out... not always this explicitly, but certainly implicitly. Acknowledge that challenge, appreciate that they're not just trying to do their job, but trying to lean into the headwind generated by blowhards who believe that they're genetically incapable of doing their job, let alone excelling at it.

As for the men who agree with TDTSNBL? You're welcome to your opinion. I'll give you that. But you are wrong, and you are outnumbered.



Mekka Okereke → google.com IIII

Aug 7, 7:04 AM

:

I see an unfortunate misunderstanding that's going on in communication between leadership and most of Google, specifically around "reasoned debate." We are attributing missteps in communication to a very unfavorable intent.

What I think leadership are trying to communicate is:

"This PCCH nonsense is trying to hide behind the veil of reasonable, data driven, challenging of assumptions that they know we like. No one is buying this.

We want to shut this nonsense down hard, but in a way that doesn't prevent us from having real conversations about other important topics in the future. Doing this right takes time."



Andrew Young ▶ google.com III

Aug 6, 4:07 PM



I've been struggling for a while with the limitations on "being your whole self" at work and I think this demonstrates the shortcomings of that presumption, although I have other examples. We're a large multinational company. Nobody should expect to be able to be their whole self, particularly the parts of their whole self that make others uncomfortable. If your whole self reinforces the existing privilege structure, all the more so.

71



Andrew Over > google.com

Aug 8, 1:36 PM

Freedom of speech and freedom of consequence from speech are two entirely different things. If the only thing holding you back from saying things that degrade/devalue/disrespect your coworkers is fear of consequence and this makes you feel uncomfortable, perhaps spend some time thinking about why that is and whether Google is the right place for you.

There's little else I can say that hasn't been said more eloquently by others.



Zac Bowling > google.com

Aug 10, 4:56 PM

James Demore is a troll. He was on campus by the Android figures and was trying to go live on pariscope during the town hall. Doubling down on his rhetoric it seems to make himself an icon instead of apologizing and going into a corner to let this all blow over for himself. Looks like he never wants to work in tech ever again.



72



Vicki Tardif Holland ▶ google.com IIII

Aug 3, 9:29 AM

:

I am always amazed at the **need** some early/mid-career engineers have to write (internal to Google) public, career-limiting documents. Of course, they are usually followed a year later with table-flipping epitaphs about how they are leaving because it is impossible to get to L6.



18



4



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Francis Fung

Well, actually, I'll bet they have sincerely held reasons for taking these actions.

(Is that sufficiently sarcastic to avoid Poe's law? I can't tell anymore. :P)



Vicki Tardif Holland +2

+Francis Fung I am sure they do. But when someone claims Google has "extremist and authoritarian policies" because they were forced to sit in Unconscious Bias training for a few hours, I don't know how to get around Poe's Law.



Simone Wu

Seriously! What IS it with these goofballs?



Christopher Richards

I wonder how often Google is their first employer. I suspect most other employers are less likely to let matters get to the "career-limiting doc" phase, not to mention the "wondering why

not promoted" phase.



73



Trevor Schroeder > google.com

Aug 5, 7:54 PM

:

I have the feels so I'll keep spewing until I don't or I'm sufficiently embarrassed to stop.

As a manager, I have to walk a fine line when it comes to political neutrality.

It is inappropriate to speak from a position of authority about what is or is not correct political orientation.

However, Google has very clear **values** and ones which would cause me to leave should I feel they were violated include pursuit of diversity and inclusion.

If your personal or political views are antithetical to that you can get the hell out.

I know where the door is.

I'm sure wound up about this.







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Travis Wise > google.com Illa

Aug 6, 5:32 PM



We appear to have some employees who (1) have too much free time on their hands at work, and (2) aren't a good cultural fit with the values of the company they work for. They should find another place to work.







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74



Timothy Jordan → google.com III

Aug 7, 2017

:

Below is the email I sent my team this week

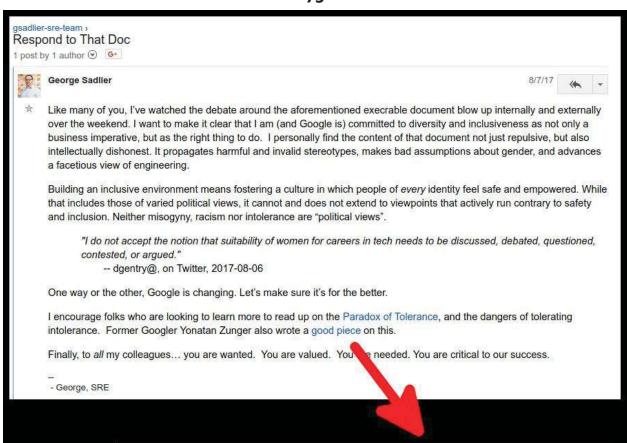
Subject: Everyone on this team belongs here

Hey Team,

By now many of you will have heard about or read the 'pc manifesto' written by an ill-informed and misguided person at this company. I'm so incredibly disappointed that one of our coworkers could possibly think this is even remotely a contribution to objective debate. This is mansplaining at it's most caustic and it's not okay.

I found myself looking for catharsis by reading Yonatan's response (https://goo.gl/hPSg9g) which led to his piece on Tolerance (Tolerance is not a moral precept, https://goo.gl/Yrk71Z), Julie Pango's So You Want to Be an Ally (https://goo.gl/3GBZEd) and 101 off limits (https://goo.gl/Dhc2gY) and Terri Oda's How does biology explain the low numbers of women in computer science? Hint: it doesn't (https://goo.gl/d2ohLx).

All that helped, but I needed to do one more thing, I needed to write this email. Because we're all in this together. We don't have to just deal with the tech industry we inherited, we can actively build the one we want. What do you want? I want a culture that values open discussion and exchange of ideas but also one that unmasks prejudice disguised as scientific reasoning. I want an industry that deeply values diversity without question and fights for it. That's why I'm going to Grace Hopper this year, it's why I'm writing this email, and it's why I hope you'll join me in making sure everyone on this team feels belonging and can bring their authentic selves to work.



And as for its impact on you: Do you understand that at this point, I could not in good conscience assign anyone to work with you? I certainly couldn't assign any women to deal with this, a good number of the people you might have to work with may simply punch you in the face, and even if there were a group of like-minded individuals I could put you with, nobody would be able to collaborate with them. You have just created a textbook hostile workplace environment.

76

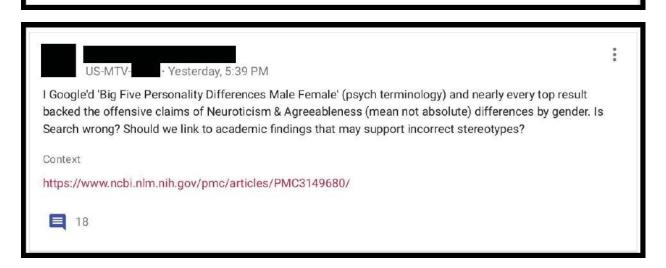


Sitaram lyer > google.com III

Aug 5, 7:42 PM

Management, FFS please stop pacifying, and take an actual position to stop this madness right now.

It's nice that we are all inclusive and happy people, and glad we're not "encouraging" the viewpoint, but WHAT HAPPENS when someone pushes a horrible, bigoted essay that causes widespread hurt? Any consequences? Nothing? Which is it? Because if we don't take a position, then good people will leave. Because the bar to whatever one can say and get away with has just been significantly lowered, so what's next -- something far more dangerous? And the only people working for us then are the people who are ok with that? Where's the line -- is it not this document? What will you do about it? What values does the company hold AND IS WILLING TO UPHOLD?





Anonymous Today, 1:00 AM

- Sudar's email calling out female stereotypes in the memo, but not male stereotypes
- perf handout stereotyping whites
- co-workers saying "it's not sexism / racism if it's against males / whites".

What can we do to communicate to everyone that white / male stereotypes are also hurtful?



77

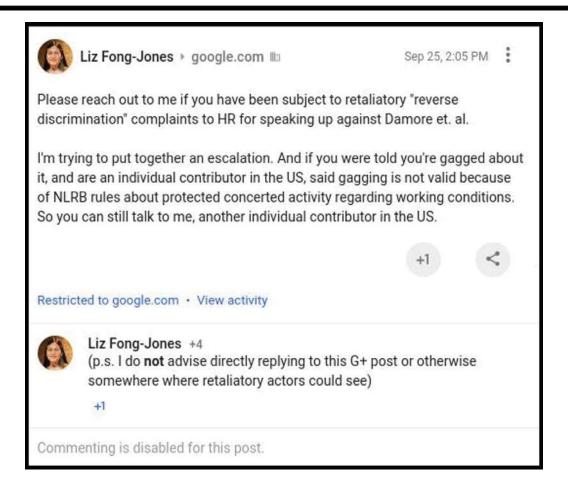


John Olson ▶ google.com III

Aug 4, 2:44 PM

.

I want to say something clever about pc-considered-harmful, but mostly I'm just disgusted and angry. If Google's mission is to "organize the world's information and make it universally accessible and useful," how the heck will we do that if we only hire straight white men? That's a really weird, biased minority of humanity with no access to substantial chunks of the world's information. I am proud to work for a company that has acknowledged its own biases, and is actively working to correct the biases that have kept women and people of colour out of the tech industry. I think Google's "PC" policies are some of the best things about this company. I want more women, and more people of colour, and more GLBTQIA (did I miss anyone?) people and more differently-abled people and more diversity and variety in my colleagues every day, and I will work to help make that happen through recruiting and hiring and training and mentoring and promotion.





Andrew Bunner > google.com 165

14h

James Damore has really gone out of his way to show the world just how unemployable he is. I hope for him that he grows up and develops some measure of empathy. A long road given how far he's dug his heels in.

Originally shared by Ashleigh Rentz - 3 comments

There are racist people working at Google.

There are sexist people working at Google.

There are anti-Semitic people working at Google.

There are homophobic people working at Google.

There are Islamophobic people working at Google.

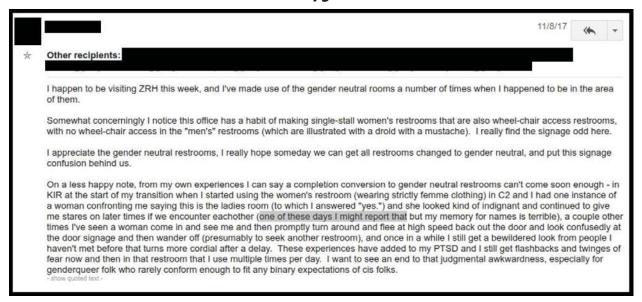
There are transphobic people working at Google.

Racism, sexism, anti-Semitism, homophobia, Islamophobia, and transphobia are not opinions; they are anti-values. We must reinforce our company's culture by openly and loudly rejecting those anti-values.

Googlers should not feel comfortable holding any of those anti-values here. If Googlers express those anti-values, then those anti-values become part of our shared culture. The paradox of tolerance tells us that we cannot tolerate intolerance unless we accept that intolerance has a place here.

Appendix







Sep 28, 2016

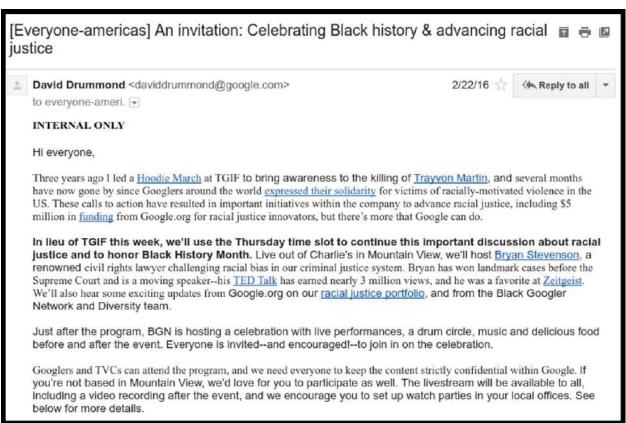
In the women's bathroom just now, a Googler was changing her baby girl's diaper when another Googler came in and said to the baby, "Oh look at you with those big eyes! That must be why all the guys like you! You're such a flirt!"

I quietly pointed out to the second person that it's inappropriate to sexualize an infant, and that her comments reinforced sexist and heterosexist norms.

I'm sharing this because it was so blatant, because it happened at Google and involved only Googlers (except for the baby), and as a reminder that bias is pervasive in our culture.

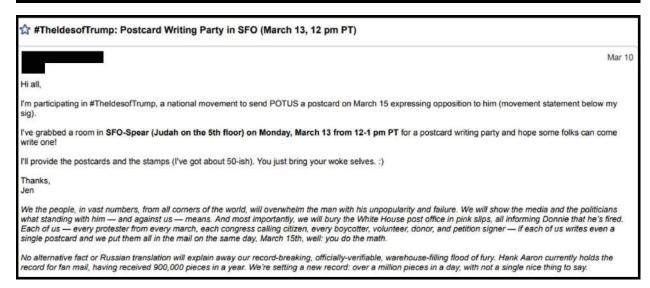
Appendix





Appendix 81

[Googlers-us] A Conversation with Van Jones and Race@ panelists David Drummond daviddrummond@google.com 12/5/16 Reply to all to Googlers-us -Hi everyone, A couple of weeks ago, we announced Race@, Google's initiative to address race and racial justice issues. As the executive sponsor of the Race@ speaker series, Decoding Race, I'm excited that we are taking these important steps to have more open and constructive conversations on race. I'll be hosting Van Jones for a Fireside Chat on Monday, Dec. 12 at 10am in Charlie's Cafe. Following this chat, I will moderate a panel on programming and prejudice, with Bradley Horowitz, Nancy Douyon, Megan Rose Dickey, and Anil Dash. Details are already on your calendars. You can join us in person in Charlie's or watch via our livestream from your desk or in one of the viewing rooms. We'll also leave time for Q&A, so add your questions to the dory. Please know that Decoding Race is just one step in raising our awareness about race; the next step in Race@ is to embark on a journey to learn more about race, with courses we will make available in Grow in 2017. Stay updated by signing up for alerts from the Race@ team here.





If you support Trump, or you don't live "reasonably close" to SF, you can stop reading now.

If you can't stand Trump, read on!

Fellow members of the Herschel team,

To print your own copy of this sign, http://goo.gl/PMMsdH

I cordially invite you to this:



Event page ^

190

If your stomach turns when you consider a Trump presidency, I urge you to not let this moment pass quietly.



August 25

Alternate proposal: moratorium on hiring white cis heterosexual abled men who aren't abuse survivors.



originally shared:

On Googler Entitlement:

I work in CorpEng, hence on a project for Googlers (http:// go/optimus-time). Since I joined this project my opinion of the average Googler is getting worse and worse. Googlers are a bunch of spoiled brats. The amount of entitlement that some Googlers express in their feedback to our project is sometimes really absurd. Our project being called "obnoxious" is just one example. Another one are people assuming that they basically own meeting rooms and we are the baddies by pointing out how wasteful they use them.

I often wonder what would help to adjust Googlers' entitlement. My suggestion is the following: I don't think we should hire anyone directly from university. Everyone joining Google should at least have had to work in some shitty normal company for at least half a year. I am pretty sure after that, most people would appreciate what they have here much more (and that includes appreciation for their colleagues and what their colleagues work on). And for those colleagues that are already here I propose an

Industryinfo >

Biggest pay gap in America: Computer programmers

25 posts by 14 authors @



http://www.cnet.com/news/biggest-pay-gap-in-america-computer-programmers/

Life is sweet for computer programmers. Companies crave their coding skills and will do anything to attrac **Tahoe**.

But being computer programmer is even sweeter if you have a dick.

That's the obvious verdict from a report released Wednesday by job recruiting site Glassdoor, which exam

Glassdoor's "Demystifying the Gender Pay Gap" report concludes that, when it comes to women's pay, co same job -- and the same education, years of experience and age, among other factors.

"I don't think there are any examples of technical jobs where there is a pay advantage for women."

Andrew Chamberlain, Glassdoor's chief economist

The advantage of terms like "diversity" and "unconscious bias" is that they're easier for people to accept than older terms like "prejudice" or "white supremacist patriarchy", but if we lose sight of the fact that these really do mean the same thing, then we will fail to fix the problem.

From:

Date: Mon, Jan 9, 2017 at 5:52 PM

Subject: Talks at Google & Race@ present I Decoding Race Series

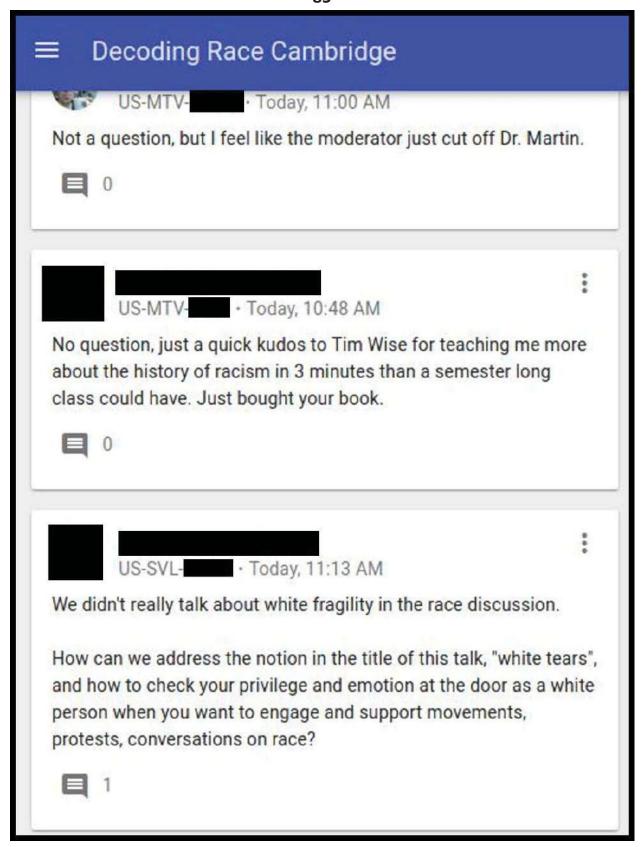
To: everyone-cam <everyone-cam@google.com>

Hi Cambridge,

On behalf of the Talks at Google and Race@ teams I'd like to invite you to a <u>Decoding Race</u> talk titled "The Responsibility and Role of White People in Responding to Racism."

I'll be hosting the talk on January 18 here in the Cambridge office as part of a 11-part series, and I hope that you'll join us for what promises to be an enlightening and empowering conversation about race that centers on white racial identity.

To help lead the discussion, we'll be joined by award-winning national and local race experts and leaders <u>Tim Wise</u>, <u>Dr. Atyia Martin</u> and <u>Michael Patrick MacDonald</u>. We'll discuss how white Googlers may want to be a part of the solution, and how to confront their fears of being seen as racist. We'll also talk about ways to grapple with race and its intersections, whether your experience is currently centered around ally-ship, colorblindness, or thinking that race is not a significant factor in people's lives. I strongly encourage Googlers to come with an open mind, an appetite to learn, and willingness to contribute during the Q&A.





Oct 13, 2014

:

I'm planning to go to the "Dear White People" screening + director Q&A Thursday at 5:30. I don't know who I'm going with, so if you're going or thinking of going, let me know!

"Dear White People" Advance Movie Screening & Director Q&A



"Dear White People" Advance Movie Screening & Director Q&A

Please fill out this form if you are interested in attending the Google advance screening of "Dear White People."

What: "Dear White People"
Who: Googlers & Interns + 1 Guest (Guest can be a Non-Googler)
Time: Thursday, October 16 at 5:30pm - 8:15pm

Location: Century Cinemas 16 (1500 N Shoreline Blvd, Mountain View, CA 94040)
Add G+ Invite to Calendar at: go/dwpmovie

Movie Preview: www.dearwhitepeoplemovie.com, www.imdb.com/title/tt2235108 Movie Running Time: 1 hr 40 min



Tim Chevalier +1

I would also like to state a boundary that if this thread becomes centered on how white men feel about being called sexist and how white people in general feel about being called racist, I will mute notifications. It's up to +Colin McMillen how to moderate threads on his statuses, but that is my boundary.



ckd Christopher Davis > google.com

Nov 15, 12:44 PM

It's time again for the too-frequently-needed reminder that "cargo cult programming" is a problematic phrase that is both racist in origin and often insulting in use.

If you think code is being unnecessarily repeated, say so in those words. It's best to do so while offering a solution for removing the redundancy, since the original author may not be aware of the best ways to reuse code and/or definitions in a given language. (This particularly goes for things like GCL, where I've managed to break things more than once while trying to limit redundancy.)

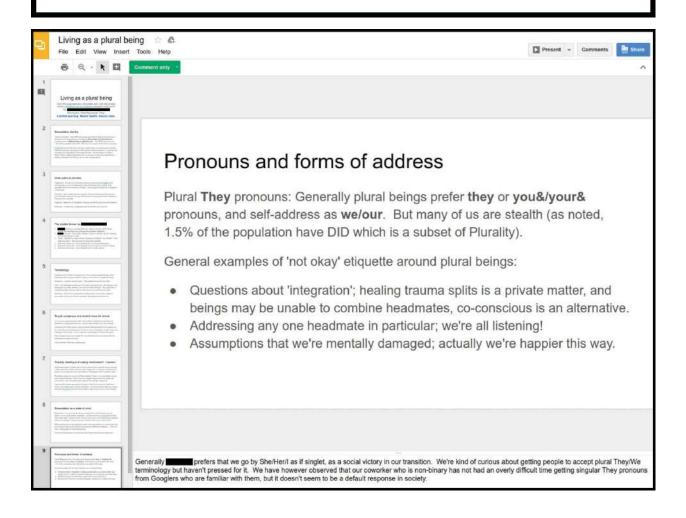


EXHIBIT C

Folks, friends, confidantes, colleagues and partners in crime: I'm writing to say goodbye to Google. First, I'd like to share that I've had a great time over the last two and a half years; I've learned a lot from all of you, and I carry with me quite a few memories that I won't forget. It was not easy, and it took a long time, for me to come to this decision. I have been unhappy for a while and, though I have tried to keep a positive perspective, not much has changed that would help me actually feel differently. So much so, that on Monday last week, I felt simply too sick to even contemplate going to the office. All I could think of, was quitting. This is what I am doing today, and I explain why below. I'll be searching for new opportunities here in Zürich over the course of the next weeks. If you know of any, I'm certainly open to suggestions. Finally, I don't mean this to be a goodbye to you. While I have not had a chance to collect contact information from many of you, if you'd like to keep in touch, please write to me at rudd-o@rudd-o.com (GPG fingerprint 320B 2934 CAC6 EF54 16FF A16C 5C06 F67A 8BDE BA09). A chat over beers and steaks, about anything Google or not, would be great as well. Manuel Amador (Rudd-O) Why Rudd-O is leaving. One of the things I'm proud is that I was raised to speak up, and to be frank, with regards to ideas good or bad — that I encounter in my life. While I am by no means correct all the time — and, oh, how I would like to be, as that skill would be very useful in Vegas and Wall Street — I try to at least tell people

what's on my mind — whenever and wherever there's a forum to discuss ideas that are important, ideas

that shape how we live, and ideas that inform our ethics. In all of my friendships and business dealings, I've tried to meet this bar that my education instilled on me, of honesty and sincerity, and of honoring the respect given to me by giving it back in return. Consistent to this condition of mine, one of my fundamental needs within any environment that I frequent is to be afforded the opportunity to speak truthfully and honestly without reprisals. I can say with confidence that I have had a chance to be frank to every single one of you, and I have enjoyed the privilege of frankness from you in return. This is what makes friendships (and relationships in general) blossom, and I wouldn't have had it any other way.

I can't, however, extend this gratitude to Google as a whole.

Google has problems.

You might be thinking that I'm referring to the political bias and favoritism of many of its employees for the current U.S. administration. Or perhaps its no-longer-secret dealings with Hillary Clinton's Department of State about the Benghazi videos. Or its involvement in the clandestine PRISM program which, I'll be the first to admit, takes place only because Google remains under duress.

Those are not the problems I am referring to.

Google employs a few individuals (from rank-and-file to upper management) who are or have become highly ideological. They have made it one of their ostensible missions to have the entire company conform to these ideologies. Most of them believe that all of us — me and many others included — should not be permitted to impugn or question the ideologies they want to impose.

The ideologies that, over the course of the last years, have taken hold, are no secret. Selective equalism, "social justice", "diversity" (always of external characteristics but never of viewpoints), regressive racialism and sexism, invisible privilege theory, grievance "feminism", anti-conservatism, anti-libertarianism, microaggression theory, disagreement as harassment, frivolous "phobias", "affirmative" (racist, really) action, and a decidedly hostile attitude to impartial or even marginal discussion of these ideas. These toxic (not to mention wrong) ideologies of "political correctness" cause people to atomize themselves into tribal affiliations based, not on attributes from reality or reasoned conclusions, but on allegiances to ideologies and artificial victimhoods. This irrationalism have, in turn, caused within the company a series of moral panics with which quite a few Googlers are familiar.

Outside of Google, these ideologies have succeeded so wildly that, today, you can be disinvited from a talk and tarred as a hateful racist simply because you once pointed out that the African slave trade hundreds of years ago involved black people kidnapping and selling other black people, or fired and blackballed for making a donation to a political initiative that in fact was successful and popular just a few years ago. In fact, I expect that at least one person would use this very paragraph to accuse me of being both a racist and a homophobe, falsely inferring motive and intent on my part, simply because I referred to these facts in this paragraph. But to consider that an accident by a misguided yet well-meaning person, would be to miss the point — it is the whole point of the ideologue pushing for these ideologies to make it impossible to discuss the issues they want people not to discuss! Since reality contradicts the ideologue, it is reality which must be suppressed, by hook or by crook.

Inside of Google, they are all too common as well. Though I personally won't be naming names in this note, during these years many people (including me) have faced contempt, opprobium, insults, smears, provocations, threats of industry blacklisting, and even frivolous H.R. reports that influence my career (and many others'), in retaliation for voicing my mind. The tone of this treatment was always particularly intense whenever I dared to question the set of ideologies that I found incorrect, toxic or divisive. I have been slurred as a racist, a sexist and "privileged", in direct contradiction to the content of my thoughts, and in contempt of the tough things I have had to live through to get where I am. I have had mean people interfere with a forum I was a part of, just to generate the false impression that people in the forum were bad individuals. I have been directly ordered by senior management to "stop posting immediately" on a thread where I had managed to give other Googlers the impression that it was okay to discuss a common myth about free speech. I've seen a person get banned from a mailing list, and their conduct characterized as "not welcome", for daring to disagree one time, and politely, with a premise of a discussion. I've seen people bring up conclusively damning complaints to government agencies about this problem. I've seen people quit.

So how Kafkaesque and totalitarian has the situation become at Google?

About a month ago, I was called to meet with H.R. as a result of someone filing a complaint about something I did not say, did not write, and do not believe. And then, in what really defied the limits of audacity, I was asked in that meeting to apologize for that which I did not say! Of course, I did no such thing... but that was the moment I changed my mind, from "Google has a big problem", to "even if I have to peel potatoes for a living, I really can't work here anymore."

There is without a doubt a systemic component to this degeneration of company culture. The ideologues either occupy privileged positions in company management or receive support and encouragement from company management. People like me, who oppose these ideologies, are silenced by management or 'coached" by H.R. to effectively shut up and focus on our work. Conversely, people who proselytize these ideologies and actively alter company policy to legitimize them, are portrayed as virtuous and even rewarded professionally. In fact, there appears to be a push towards making it mandatory for certain promotions to have been involved in proselytizing these ideologies. All of you are extremely bright, so the outcome of this systemic bias ought to be a foregone conclusion to you. Of course, there's also the external component to what Google as a corporation does, which has included (but doesn't stop at) front page Doodle support for a controversial Marxist terrorist sympathizer, as well as funding plus venue for events to give platforms to sexist and racialist hatemongerers and riot organizers.

Some folks might be tempted to dismiss these concerns by arguing that Google is but a workplace, where people come to work and not to "discuss politics", and therefore these concerns are not valid. I would have no problem accepting that argument if such a standard was applied equitably and Google did not pick favorite ideologies. But clearly the standard is not applied equitably, as these ruinous politics shape the workplace conditions that every employee and TVC experiences. The result of this uneven standard is that partisans of the ideologies are very happy to work at Google, at the expense and at the detriment to the happiness of folks like me and many others. Many others who, may I note, simply don't voice their concerns, because they fear retaliation and opprobium from colleagues bent on getting their own ideological theories put in practice at Google.

I'm not sure if I'm the only one who believed this, but when I began working at Google, I believed that Google was a unique place, where frank and honest discussion of any issue could be entertained, where data would often be used to settle the argument, people got respected right or wrong, and the value of open communication was cherished. At the time, this impression made Google the superior choice of company to work for, much in the way that, for many folks, catered food is a great reason to work for Google. Today, I feel defrauded; the reality is that discussion is allowed, but only insofar as everyone involved continues to look away from the Emperor's buttocks. Point to his plump cheeks, and you'll get booed with the classic "Wrongthink! Hateful!" in no time.

As the third rail has become fatter and fatter and harder to miss, many other Googlers — who remained silent because they had a substantive belief that there would be repercussions if they spoke up — already quit over this. I, too, thought their decision was premature... but now they have proven to be correct. And so, my time has come.

Footnotes:
¹ Many group these ideologies under the term "political correctness". That term gives people a wrong idea of where these ideas come from, or what they really are. A more honest term is "cultural Marxism": a term that indicates how the Frankfurt School (née Institut für Sozialforschung) applied Marxist class analysis to cultural critiques — you may have noticed that Marxist class analysis is the common thread underlying all those ideologies. Interestingly, the Frankfurt school disguises this fact by calling their work "critical theory". From Marcuse's infamous "Tolerance of the intolerant" instigating people to be vitriously intolerant of anyone against these traditionally-leftist ideas, to modern academic noise about people resistant to adopt entirely made-up pronouns and animal-kin genders, the attack on basic philosophical truths from these wrong-headed modes of thinking against society has given no quarter.
A note on privacy:
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