



# BUREAU of LABOR & INDUSTRIES

Civil Rights Division Complaint of Unlawful Practice

Christina Stephenson | Labor Commissioner

<b>COMPLAINANT:</b> LEANN JOHNSON	<b>Case #:</b> EEEMRC231221-11659	<b>Attorney:</b>
<b>RESPONDENT:</b> State of Oregon OREGON HEALTH AUTHORITY 800 NE OREGON ST. PORTLAND, OR 97232	<b>Contact:</b>  Civil Rights Manager Office of Equity and Inclusion Oregon Health Authority 421 SW Oak Street, Suite 750 Portland, OR 97204  Madilyn Zike Chief Human Resources Office Dept of Administrative Services 155 Cottage St NE #U-30 Salem, OR 97301  Tessa M Sugahara Oregon Department of Justice Labor & Employment Section 1162 Court St NE Salem, OR 97301	<b>Headquarters:</b> State of Oregon Oregon Health Authority 500 Summer St NE E-20 Salem, OR 97301
<b>County:</b> Multnomah	<b># of Employees:</b> 500+	
ORS 659A.030(1)(b)(f); ORS 659A.199; ORS 659A.203		

KA/23-04995\ 11.27.2023

I, Leann Johnson, under penalty of perjury, do depose and say as follows:

**Allegations:** I allege unlawful employment practices based upon my race and sex and my reporting and opposing unlawful practices in that Respondent subjected me to different terms, conditions, or privileges of employment and to retaliation.

- Respondent is a state agency. I began working for Respondent in 2010 and remain employed with Respondent as of the date of the signing of this Complaint. My current and most recently held position with Respondent is as Director of the Equity and Inclusion Division for OHA.
- I am a Black woman.

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3. On multiple occasions during my employment, I raised concerns that other employees, including my own subordinates, were experiencing discrimination on the basis of race, national origin, and various other protected classes. Specifically, I either corresponded or met with Margaret Wilson, Oregon DOJ liaison to OHA, on January 26, 2023; with James Schroeder, interim OHA director, and Kris Kautz, OHA deputy director, on February 14, 2023; again with just Mr. Schroeder on February 17, 2023; and with Dave Baden, interim OHA Director, on April 19, 2023 and on May 3, 2023.
4. Following my first meeting with Ms. Wilson in January of 2023, I was blocked from participating in a disciplinary proceeding against one of my subordinates, about whom I had reported concerns of racially based discrimination. Upon information and belief, other directors are typically permitted to participate in disciplinary proceedings against individuals within their departments.
5. Also in January of 2023, I was not included in discussions about whether to reinstate another employee who had experienced performance concerns. I had previously expressed concerns that this particular employee, an Asian woman, not be reinstated after performance concerns were raised when a similarly situated Black man had not.
6. During my employment with Respondent, I have experienced gaslighting, scapegoating, and questioning of my competence, character, and honesty. I have also observed undermining of my management decisions and a lack of communication with me and my Division. Much of the aforementioned treatment of me exploited stereotypes of “angry Black woman” and other stereotypes imposed on Black women. Upon information and belief, other Directors who are not Black have not experienced this treatment.

Respondent subjected me to different terms, conditions, or privileges of employment and to retaliation based upon my race and sex and my reporting and opposing unlawful practices.

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

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

DocuSigned by:  
**Your signature:**

[Redacted Signature]

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**Date:**

12/21/2023