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13 *Attorneys for Plaintiff Marcus Vaughn*
14 *and the Putative Class*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF ALAMEDA – UNLIMITED JURISDICTION**

19 MARCUS VAUGHN, individually and on
20 behalf of all others similarly situated,

21 Plaintiffs,

22 vs.

23 TESLA, INC. doing business in California as
24 TESLA MOTORS, INC.; and DOES 1
25 THROUGH 50, INCLUSIVE,

26 Defendants.

Case No. RG17882082

**DECLARATION OF MONICA
CHATMAN**

1 I, Monica Chatman, declare as follows:
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3 1. I am over the age of 18. If called upon to testify, I could and would testify competently as
4 to the facts set forth in this declaration.

5 2. I identify my race as Black.

6 3. I was employed at the Tesla factory in Fremont, California from approximately November
7 16, 2016 until approximately September 11, 2019. At the Tesla Fremont factory, I worked on the
8 factory production floor as a Forklift Operator. I worked on the General Assembly Line and the
9 Model 3 Line.

10 4. I was hired to work at Tesla by a staffing agency, West Valley Staffing. However, after I
11 was hired, everything about my job working at Tesla was controlled by Tesla and its managers. I
12 had almost no day-to-day interaction with my staffing agency at all, and my staffing agency
13 provided no supervision of my day-to-day work – they only issued my paychecks. Throughout
14 my employment at Tesla, I reported to Tesla supervisors. My Tesla Supervisor was Roger
15 Beltran. Mr. Beltran would control how I did my job every day, telling me what hours I would be
16 working, how to do my job duties when I was on the job, and when to take lunch and breaks. I
17 was trained to do my job at Tesla by a Tesla supervisor. I used only Tesla equipment in doing my
18 Tesla job.

19 5. To the best of my knowledge, while I was employed at Tesla through
20 West Valley Staffing, I did not sign an arbitration agreement.

21 6. On approximately March 8, 2017, I became a direct employee of Tesla. I stopped working
22 at Tesla on approximately September 11, 2019.

23 7. I have no recollection of signing an arbitration agreement with Tesla, though there may
24 have been something about that in my onboarding paperwork when I became a direct employee.

25 8. During my employment at Tesla, I heard the words “Nigger” and “Nigga” used in the
26 factory. I heard the terms “Nigger” and “Nigga” used approximately 25 times by coworkers in the
27 Tesla factory.
28

1 9. I was directly called “Nigger” by my Tesla supervisor, Roger Beltran, on two occasions at
2 the Tesla Fremont Factory. I have overheard Mr. Beltran use phrases like “I can’t stand her Black
3 ass,” and “tell her to get her Black ass over here,” when referring to me.

4 10. I have also heard the terms “monkey” and “dirty” used as racial slurs toward Black
5 workers by coworkers in the Tesla factory.

6 11. Along with racially harassing language, I observed a pattern of discriminatory treatment
7 against Black employees at the Fremont factory. Black employees, including myself, were not
8 given raises, and were promoted far less than non-Black employees, while being reprimanded,
9 disciplined, and written up more often than non-Black employees at Tesla.

10 12. My supervisor, Mr. Beltran, also segregated the Model 3 Line by race, and stationed
11 almost all of the Black employees together at the very back of the Line, out of sight.

12 13. I have heard both Black and non-Black employees refer to the Tesla Factory as “the
13 Plantation.” My understanding is that people refer to the Tesla factory as “the Plantation” because
14 Tesla treats its Black employees like slaves.

15 14. In 2018, I complained to Human Resources about Mr. Beltran’s behavior, including his
16 racist anti-Black behavior.

17 15. Tesla did not take immediate or appropriate action to stop the racist behaviors from
18 continuing after I complained.

19 16. Instead, after I complained about the racist behaviors I observed and experienced at the
20 factory, I was retaliated against. After I complained, I stopped receiving performance reviews
21 from Tesla, and stopped receiving stock in the company, and I felt that Tesla was looking for a
22 reason to terminate me. Ultimately, on approximately September 11, 2019, I was terminated for
23 hitting a sprinkler with a forklift. I know other employees who have hit objects with forklifts,
24 including sprinklers, equipment, and people, but who have not been terminated for their mistakes.

25 17. I am offended by the racist behaviors I observed and experienced at the Tesla Fremont
26 factory. The racism that I experienced altered my working environment, making it hostile.

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I declare under the penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct. Executed in Fremont , California.

Jan 20, 2021
DATED: _____

Monica Chatman
By: Monica Chatman (Jan 20, 2021 20:17 PST)

Monica Chatman






Dec_Monica Chatman

Final Audit Report

2021-01-21

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