

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MICHAEL G. OLIVERI,**

**Plaintiff,**

**v.**

**SHELL OIL COMPANY,**

**Defendant.**

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**Civil Action No. 4:17-cv-01970**

**DECLARATION OF ANDREW MAYNOR**

1. “My name is Andrew Maynor. I am over eighteen years of age, of sound mind, have never been convicted of a felony, and am competent in all respects to make this declaration. The facts stated herein are within my personal knowledge or based upon a review of business records, and are all true and correct.

2. I am currently employed by Shell Oil Company as a Human Resources Account Manager.

3. Shell Oil Company is a leading U.S. energy company headquartered in Texas with operations around the globe.

4. Shell Oil Company publishes policies against discrimination, harassment, and retaliation on an annual basis. Additionally, Shell Oil Company’s Code of Conduct outlines expectations for ensuring equal employment opportunity in hiring and selection decisions. The Code of Conduct specifically outlines that discrimination on the basis of race, color, religion, age, gender, sexual orientation, gender identity, marital status, disability, and ethnic origin or nationality is prohibited.

5. Shell Oil Company has a strong commitment to creating a diverse and inclusive workplace. As part of its diversity and inclusion efforts, Shell Oil Company encourages managers to consider a diverse slate of qualified candidates when recruiting new talent. Consistent with its Equal Employment Opportunity policy, Shell Oil Company expects managers to select the most qualified candidate, without regard to any protected characteristic, when making the decision to hire new talent.

6. As a global employer, Shell Oil Company recognizes that, to the extent that there may be a conflict between laws in other countries, Shell Oil Company’s human resources and legal departments will closely monitor and provide advice and counsel to its supervisors and managers to ensure that a violation of its policies and any laws does not occur.

7. In the second interview process for the U.S. Security Advisor position, the two female candidates in the prior interview process, Susan Pletz and Veronica Washington, did not reapply for the position.

8. As a Human Resources Account Manager, I am a custodian of records for Shell Oil Company. Attached to this declaration are true and correct copies of:

- **Ex. A:** The Purchase Order between Shell Oil Company and G4S Secure Solutions (USA) for a Special Event Coordinator
- **Ex. B:** Special Event Coordinator Announcement
- **Ex. C:** August 5, 2015 Email Correspondence between Michael Dixon and Crockett Oaks
- **Ex. D:** August 22, 2013 Email Correspondence between Michael Oliveri and Crockett Oaks
- **Ex. E:** Jasper Smidtman Business Integrity Department Investigation Report for Project Vireo
- **Ex. F:** August 23, 2013 Email Correspondence between Crockett Oaks and Michael Oliveri
- **Ex. G:** October 1, 2013 Email Correspondence between Crockett Oaks and Michael Oliveri
- **Ex. H:** September 5, 2013 Email Correspondence between Crockett Oaks and Peter Lininger
- **Ex. I:** August 5, 2015 Email Correspondence between Dana Croft and Crockett Oaks
- **Ex. J:** December 11, 2013 Email Correspondence between Crockett Oaks and Michael Oliveri
- **Ex. K:** June 6, 2014 Email Correspondence between Crockett Oaks and Michael Oliveri
- **Ex. L:** June 11, 2014 Email Correspondence between Crockett Oaks and Michael Oliveri
- **Ex. M:** Excerpts from Shell Code of Conduct
- **Ex. N:** Shell Equal Opportunity Policy
- **Ex. O:** September 28, 2016 – Crockett Oaks Conflict of Interest Form
- **Ex. P:** July 7, 2016 Email Correspondence between Crockett Oaks and James Hall

- **Ex. Q:** October 20, 2016 Email Correspondence between James Hall and Jasper Smidtman
- **Ex. R:** September 9, 2016 Email Correspondence between Crockett Oaks and Robert Schoen
- **Ex. S:** September 14, 2016 Email Correspondence between James Hall and Crockett Oaks
- **Ex. T:** August 26, 2016 Panel Instruction Emails
- **Ex. U:** September 14, 2016 Email Correspondence between James Hall and Dana Croft
- **Ex. V:** September 14, 2016 Email Correspondence between Crockett Oaks and James Hall
- **Ex. W:** September 14, 2016 Email Correspondence between Dana Croft and Crockett Oaks
- **Ex. X:** September 16, 2016 Email Correspondence between Crockett Oaks, James Hall, Klara Smits, and Dana Croft
- **Ex. Y:** September 27, 2016 Email Correspondence between James Hall and Dana Croft
- **Ex. Z:** Anonymous Complaint
- **Ex. AA:** Thomas Hutt Complaint
- **Ex. BB:** January 16, 2017 Email Correspondence between Kathy Long and Michael Oliveri
- **Ex. CC:** January 17, 2017 Job Posting and Application
- **Ex. DD:** September 12, 2016 Email Correspondence between Crockett Oaks and Michael Oliveri
- **Ex. EE:** 2017 Interview Documents
- **Ex. FF:** May 2, 2017 Email Correspondence between Michael Oliveri and Ana Chevez
- **Ex. GG:** January 20, 2017 Email Correspondence between James Hall and Gonny Alblas
- **Ex. HH:** Excepts from the Framework Agreement between G4S Global Holdings Limited and Shell International Limited
- **Ex. II:** January 4, 2016 – Crockett Oaks Conflict of Interest Form

These records are kept by Shell Oil Company in the regular course of business, and it was the regular course of business of Shell Oil Company for an employee or representative of Shell Oil Company with knowledge of the acts, events, opinions, and/or conditions recorded in the record to make the record or to transmit information to be included in the record, and the record was made at or near the time of the acts, events, and/or conditions recorded. The sources of information of, and the method and circumstances of the preparation of, the attached records were in all respects trustworthy. The records attached are exact duplicates of the originals.

9. I declare under penalty of perjury that the foregoing is true and correct. Executed on July 6, 2017.



Andrew Maynor