

# Exhibit C

## CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

☐ FEPA  
☒ EEOC

AMENDED

361A00154

Texas Human Rights Commission

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

HOME TELEPHONE (Include Area Code)

Ms. Stephanie Odle

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

3707 37th Street, Lubbock, TX 79412

10/26/1971

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

Sam's Club

Cat D (501 +)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

4304 W. Loop 289, #8270, Lubbock, TX 79407

303

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE☐ COLOR☒ SEX☐ RELIGION☐ NATIONAL ORIGIN☒ RETALIATION☐ AGE☐ DISABILITY☐ OTHER (Specify)DATE DISCRIMINATION TOOK PLACE  
EARLIEST LATEST

05/14/1999 10/29/1999

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s))

I. A. On May 14, 1999, I was suspended for five days pending an investigation concerning a refund I had made to a customer.  
B. On May 20, 1999, I was given the most severe form of discipline at Sam's Club even though management was aware that I did, in fact, give a \$250.00 refund to the customer at no loss to Sam's Club.  
C. On May 20, 1999, I was forced to move from Sherman, Texas to the Lubbock, Texas Store.  
D. On May 20, 1999, I was denied a promotion as Co-manager of the Tulsa, Oklahoma store.  
E. On October 16, 1999, I was suspended and placed on administrative leave with pay, following a charge against me by the male managers that I violated company policy when I misrunc a \$13.74 amount while I was instructing three hourly employees in a new procedure.  
F. On October 19, 1999, I was terminated by the General Manager of the store, Duke Parish and Larry Alderson, the Director of Operations, to whom Mr. Parish reports for the region. A few days later I was reinstated by Gregg Spragg, Regional Vice President, pending further investigation.  
G. On October 29, 1999, I was discharged from my job of Assistant Manager for Sales and Marketing and was replaced by an existing male manager who transferred from an Arizona Sam's Club.  
H. The "glass ceiling" has been the common experience of all women throughout Wal-Mart who want to or apply to become a manager, due want to or apply to advance within management, due

JOHN HIGBONBOTTOM  
Cleveland County  
Notary Public in and for  
State of Oklahoma

\*\* Text is Continued on Attached Sheet(s) \*\*

☐ I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY (When necessary, See State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Stephanie Odle

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

(year)

Date

Charging Party (Signature)

EEOC FORM 5 (Rev. 06/99)



FILE COPY

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Equal Employment Opportunity Commission  
Form 5 - Charge of Discrimination, Additional Text  
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longstanding practice of not treating women equally with regard to promotions to management positions.

II. A. through D.-- No reason given for this treatment.  
E. I was discharged by Greg Spragg, Regional Vice President. I was told that it was for "violation of company policy."

III. I believe that I was discriminated against because of my gender, female in violation of Title VII of the Civil Rights Act of 1964, as amended, when I was subjected to adverse terms and conditions of employment, denied a promotion, disciplined and discharged.

I also believe that I was retaliated against by being discharged after I complained of gender discrimination to the main office, in violation of Title VII, Section 704(a), of the Civil Rights Act of 1964, as amended.

Women are discriminated against because of their gender, female, in violation of Title VII of the Civil Rights Act of 1964, as amended, and are subjected to adverse terms and conditions of employment.

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U.S. DEPT. OF JUSTICE