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10 LATOSHA WALKER

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

13 LATOSHA WALKER, an individual;

14 Plaintiff,

15 vs.

16 COUNTY OF LOS ANGELES, a political
17 subdivision of the State of California; and DOES
18 1-99, inclusive;

19 Defendants.

Case No.: 21STCV08300

FIRST AMENDED COMPLAINT FOR DAMAGES

- (1) FEHA DISPARATE TREATMENT DISCRIMINATION
- (2) FEHA WORK ENVIRONMENT HARASSMENT
- (3) FEHA SEXUAL FAVORITISM HARASSMENT
- (4) FEHA RETALIATION
- (5) FEHA FAILURE TO PREVENT HARASSMENT, DISCRIMINATION, OR RETALIATION
- (6) LAB. CODE § 1102.5 RETALIATION
- (7) PUBLIC ENTITY LIABILITY FOR FAILURE TO PERFORM MANDATORY DUTY (GOV'T CODE § 815.6)

[JURY FEE DEPOSIT POSTED]

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25 **COMES NOW THE Plaintiff** LATOSHA WALKER (“Plaintiff”), who heretofore alleges the
26 following facts in support of their First Amended Complaint for Damages and hereby respectfully
27 demands *a speedy jury trial* on all causes of action stated herein as against COUNTY OF LOS
28 ANGELES (“COLA”), who along with DOES 1-99, inclusive, is referred to herein as the “Defendants”.

FILED
Superior Court of California
County of Los Angeles
07/12/2021

Sherri R. Carter, Executive Officer / Clerk of Court
By: N. Osollo Deputy

Electronically Received 07/12/2021 06:41 PM

CASE SYNOPSIS

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2 1. Plaintiff is a decorated Los Angeles County Sheriff Deputy, born and raised in Compton,
3 who is presently assigned as a patrol Deputy at Compton Station.

4 2. Plaintiff is an unusually well-qualified patrol Deputy, as she had worked Operation Safe
5 Jails (gang intelligence) and had experience working with victims of human trafficking, had previously
6 been awarded and recognized for the consistently high quality of her work by both the Anti-Defamation
7 League and the Long Beach City Prosecutor’s Office.

8 3. Plaintiff was denied valuable promotional opportunities because of her race, gender, and
9 sexual orientation. Plaintiff was harassed and discriminated against on those bases.

10 4. Plaintiff was eventually assigned to the elite SAO team at Compton Station. However,
11 due to the fact that she is a gay, African-American female, she was involuntarily removed from SAO
12 under false pretenses in order to make available coveted SAO positions to members of the Executioners
13 gang and at least one female who was engaged in an extramarital affair with a key member of the
14 Executioners gang.

15 5. Plaintiff reported the discrimination and harassment she suffered to the Compton Station
16 command. In retaliation, Plaintiff was falsely accused of improper fraternization with a gang member
17 during the service of a warrant, an allegation that while entirely fabricated, provided her supervisors
18 with a pretext for her removal from the SAO team in furtherance of the Executioner’s exercise of control
19 over Compton Station.

20 6. Certain desirable positions at Compton Station were held open for Executioners
21 members, prospects, or females who were willing to have sex with Executioners leadership. Since the
22 Executioners do not allow African-American members and only give preferential assignments to
23 females who provide them with sexual favors, Plaintiff, a gay, African-American female was frozen out
24 of work opportunities at Compton Station that she was best qualified for.

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1 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

2 **Jurisdiction and Venue**

3 7. This Court has jurisdiction of the subject matter of Plaintiff's claims. Jurisdiction is
4 proper in this Court because the damages and claims alleged and demanded herein by Plaintiff exceeds
5 \$25,000, and Plaintiff herein does make a demand and prayer for damages, in excess, of the jurisdictional
6 limit of this Court.

7 8. This Court has personal jurisdiction over Defendant COLA in that it was, at all relevant
8 periods of time covered by this complaint, a political subdivision of the State of California maintaining
9 hundreds of places of business in the County of Los Angeles.

10 9. Venue in this Court is proper in that, upon information and belief, Defendants reside in
11 the County of Los Angeles.

12 10. All the harm suffered by Plaintiff took place within this judicial district.

13 **The Plaintiff**

14 11. Plaintiff is, and was, at all relevant periods of time covered by this complaint, a resident
15 of the City of Whittier, County of Los Angeles.

16 12. Plaintiff was an employee of Defendants, jointly and severally.

17 **The Defendants**

18 13. Defendant COLA is a public entity who maintains a place of business, where it employed
19 Plaintiff at: 301 S. Willowbrook Avenue, Compton, CA 90220.

20 **Relationship Between the Defendants**

21 14. Plaintiff is informed and believes, and thereupon alleges, that Defendants, and each of
22 them, were at all times mentioned herein the agents, servants, and employees of each other, or otherwise
23 were acting with the full knowledge and consent of each other. Plaintiff is further informed and believes,
24 and upon such basis and belief alleges, that in doing all of the things alleged in this complaint,
25 Defendants, and each of them, were acting within the scope and authority of their agency, servitude, or
26 employment, and were acting with the express and/or implied knowledge, permission, and consent of
27 one another. Plaintiff is further informed and believes, and upon such basis and belief alleges, that
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1 Defendants learned of, ratified, and/or approved the wrongful conduct of its agents and/or employees
2 identified in this Complaint as having engaged in wrongful conduct.

3 15. Plaintiff is informed and believes, and thereupon alleges, that at all relevant times,
4 Defendants, and each of them, were business entities or individuals who owned, controlled, or managed
5 the business which has damaged Plaintiff, and are each therefore jointly, severally, and individually
6 liable to Plaintiff.

7 16. Plaintiff is informed and believes, and thereupon alleges, that at all relevant times,
8 Defendants, and each of them, were in some fashion, by contract or otherwise, the successor, assignor,
9 indemnitor, guarantor, or third-party beneficiary of one or more of the remaining Defendants, and at all
10 relevant times to Plaintiff's claims alleged herein, were acting within that capacity. Plaintiff further
11 alleges that Defendants, and each of them, assumed the liabilities of the other Defendants, by virtue of
12 the fact that each to some degree, wrongfully received and/or wrongfully benefited from the flow of
13 assets from the other Defendants to the detriment of Plaintiff. Plaintiff further alleges that by wrongfully
14 receiving and/or benefiting from Defendants' assets, and in the consummation of such transactions, a *de*
15 *facto* merger of the Defendants, and each of them, resulted, such that Defendants, and each of them, may
16 be treated as one for purposes of this Complaint.

17 17. Plaintiff is informed and believes, and thereupon alleges, that at all relevant times
18 mentioned herein, Defendants, and each of them, were the partners, agents, servants, employees, joint
19 venturers, or co-conspirators of each other defendant, and that each defendant was acting within the
20 course, scope, and authority of such partnership, agency, employment, joint venture, or conspiracy, and
21 that each defendant, directly or indirectly, authorized, ratified, and approved the acts of the remaining
22 Defendants, and each of them.

23 **Factual Allegations**

24 18. Plaintiff is a decorated Deputy with the Los Angeles County Sheriff's Department, who
25 commenced her employment with the County of Los Angeles ("COLA") in October 2012. Plaintiff
26 grew up in the City of Compton, where she is now a Deputy at Compton Station ("CPT"). Plaintiff is a
27 model Deputy, whose meaningful and valuable contributions to her community have been formally
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1 recognized by the Anti-Defamation League and the Long Beach City Prosecutor's Office, among others.
2 Plaintiff is an open and out, masculine-presenting lesbian.

3 19. Plaintiff first arrived at CPT in August 2016, remaining in training until February 2017.
4 In March 2017, Plaintiff was involved in an on-duty traffic collision and was off of work recuperating
5 until approximately January 2018. Plaintiff was, and is, a highly motivated and hardworking Deputy
6 whose intent was to participate in the SAO Team while at CPT in order to shift to a position with the
7 CPT Detective Bureau as part of the natural career progression of a similarly situated patrol Deputy of
8 Plaintiff's caliber, work quality, and motivation. An assignment to SAO is highly desirable as it gives
9 Deputies additional experience with search warrants as part of the Detective career track. The CPT SAO
10 Team was tasked with dealing with human trafficking in the City of Compton, and this made Plaintiff
11 unusually well-qualified for the assignment, as she had worked Operation Safe Jails (gang intelligence)
12 and had experience working with victims of human trafficking, and as discussed above, had previously
13 been awarded and recognized for the consistently high quality of her work by both the Anti-Defamation
14 League and the Long Beach City Prosecutor's Office.

15 20. At approximately the time Plaintiff began to work at CPT, Jaime Juarez was the training
16 and scheduling deputy. Juarez is, and was at the time, the so-called shot caller for the deputy gang the
17 Executioners. The Executioners are an unlawful gang composed of sworn Sheriff's Deputies who violate
18 the rights of other Sheriff's Deputies, such as Plaintiff, and the public. The training and scheduling
19 deputy is responsible for determining patrol shifts and assignments at CPT, and has the power to assign
20 deputies to a traffic car or a crime car, and has the power to determine what shift a patrol deputy works,
21 what days off a deputy has, what training new hires at CPT are assigned, and if and when patrol deputies
22 are partnered with someone. Juarez abused his position as CPT training and scheduling deputy to dole
23 out preferential assignments to his fellow Executioners, and to relegate honorable deputies such as
24 Plaintiff, who are not associated with the Executioners, to undesirable shifts and assignments. The
25 Executioners have certain racial and sex requirements for membership: no Black people, and no women.
26 Women such as Plaintiff cannot become formal members of the Executioners, but they can become
27 favored associates only if they are receptive to the sexual advances of the Executioners or male
28 Executioners prospects. Because Plaintiff is an out, masculine-presenting lesbian, there was never any

1 possibility that she would, or would even be interested in, ingratiating herself to the Executioners in this
2 way. Plaintiff's possibility as a prospect for the Executioners was additionally barred by her race. The
3 Executioners, as set forth below, would abuse their control over shifts, schedules, assignments, training,
4 and partnerships, to favor women who they viewed as sexually attractive or meriting their prurient
5 interest, but who were comparatively unqualified as compared to Plaintiff, with promotions, prestigious
6 assignments, and professional opportunities that they were comparatively unqualified for, to the
7 exclusion and detriment of Plaintiff. The reason these women were promoted, while Plaintiff's career
8 was left to languish, was that the Executioners, who controlled assignments, shifts, and scheduling, were
9 sexually attracted to them, and made sexual advances to them that the women were receptive to,
10 permitted, or reciprocated.

11 21. On or about January 2018, Plaintiff was assigned to the PM Shift in a traffic car, where
12 she remained during the year. The traffic car is an undesirable assignment at CPT and is widely
13 understood by deputies at CPT to be a lowly, undesirable assignment. It is common for new patrol
14 deputies at CPT to spend some time in a traffic car; however, a year in a traffic car is a substantially
15 longer time in that lowly, undesirable assignment than other, heterosexual women deputies at CPT spent.
16 Deputies Samantha Cenicerros and Irma Sanchez, who are and present as heterosexual women, spent
17 approximately half as long in a traffic car as compared to Plaintiff. While in the Traffic Car, Plaintiff
18 was required to take crime calls in addition to her traffic calls. Since Plaintiff was not a member or
19 prospect of The Executioners group, which dominated the PM shift at CPT, Plaintiff was ostracized by
20 the group and spent the year eating by herself and with no socialization with her fellow Deputies.
21 Plaintiff later learned that prospects for Executioners membership, or female Deputies who agreed to
22 have sex with tattooed ("inked") members of The Executioners, were given preferential treatment when
23 given patrol assignments. Since Plaintiff is African American and is a gay woman, whose gender
24 identity/expression is masculine, these perks were foreclosed to Plaintiff, as The Executioners do not
25 allow Black members and the group only provides perks to females who engage in sexual relationships
26 with inked members of the group. This was the beginning of years of mistreatment of Plaintiff as a
27 result of her race and sexual orientation at CPT, with the tacit support and cooperation of her supervisors.
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1 22. During 2018, while Plaintiff was relegated to the Traffic Car, she was passed over for a
2 position she was qualified for in favor of a heterosexual female: Deputy Irma Sanchez, wife of former
3 CPT Field Training Officer Frank Montoya (now Master Field Training Officer at Cerritos Station).
4 Rather than Plaintiff, Deputy Sanchez was awarded a desirable transfer to the SAO Team. This was
5 improper in that Deputy Sanchez had just finished her training, while Plaintiff enjoyed seniority in peace
6 officer status, station time, and experience. In addition, the opening at the SAO Team was not publicly
7 announced at CPT before Deputy Sanchez was promoted to that position. There was no proper basis for
8 this preference demonstrated towards Deputy Sanchez over Plaintiff. This was the first instance of
9 Plaintiff being denied a position that was given to a less senior and less qualified Deputy as a result of
10 her race and sexual orientation. Soon after Plaintiff was reassigned from the Traffic Car, Sergeant Rene
11 Barragan offered to transfer Plaintiff to the Compton Town Center, but Plaintiff refused as this, too, was
12 an undesirable assignment. Plaintiff understood that the purpose of this prospective assignment was to
13 allow Sgt. Barragan to reassign two Executioners prospects, Deputies Miguel Vega, and Christopher
14 Hernandez, to a crime car.

15 23. In 2018, Plaintiff began to get very ill, and did not know the reason for her illness, and
16 was eventually diagnosed with a serious health condition. Plaintiff is able to perform the essential
17 functions of her job without accommodations. However, after learning of her diagnosis, Sgt. Barragan
18 accused Plaintiff of being unable to perform the job duties as a Deputy. Sgt. Barragan told Plaintiff that
19 he assumed that she would not be able to spend extended periods of time in the sun, but Plaintiff
20 corrected Sgt. Barragan by noting that she has spent every day as a Patrol Deputy at CPT in the sun, and
21 provided that she wears sunscreen, long sleeves, and a baseball cap, she will experience no ill effects as
22 a result of her work. Plaintiff did not miss any work after her health issue became medically controlled.
23 Plaintiff wears a baseball cap as part of her Class A uniform in order to control her medical condition.
24 She was singled out by Lt. Ruiz for doing so, and after she explained to Lt. Ruiz her medical need for
25 the cap, Lt. Ruiz directed Plaintiff to submit a memorandum so that her medical need could be
26 documented in her personnel file. Many deputies also wore hats with their uniforms, but none were
27 counseled or written up. The other deputies continued to wear baseball caps under Lt. Ruiz and after,
28 without any official intervention by LASD supervisors or management.

1 24. In September 2019, Plaintiff learned that a SAO Team position had become available for
2 which Plaintiff was the best and most qualified for. However, upon inquiring, Plaintiff learned that the
3 position had again been given to a less qualified and less experienced Deputy: Samantha Cenicerros, who
4 had arrived as a Patrol Deputy at CPT after Plaintiff. Sgt. Paulette Cain, on behalf of SAO, informed
5 Plaintiff that the basis for Cenicerros being offered the jobs was “stats,” which Plaintiff took to mean that
6 Deputy Cenicerros had superior arrest statistics to Plaintiff. This was absolutely false. Plaintiff is
7 informed and believes that Deputy Cenicerros was rewarded with the SAO position, which included a
8 better schedule, and being assigned to a “no call” car exempt from having to take crime calls for one
9 sole reason: she had agreed to have sex with Deputy Samuel Aldama, an influential member of The
10 Executioners. Further, Deputy Cenicerros was receptive to sexual advances from Sergeant Barragan.
11 Deputy Cenicerros was one of a number of female Deputies who had previously worked at Century
12 Regional Detention Facility (“CRDF”), where Sgt. Barragan had also previously worked, and had been
13 groomed by high-ranking members of The Executioners to come to CPT and to enjoy work “perks” if
14 they agreed to have sex with Executioners leadership. Another such female Deputy, Deputy Iliana
15 Vargas, enjoyed similar perks and preferential assignments, and exemption from discipline for an act of
16 on-duty cowardice captured on video that resulted in an Administrative Investigation against her. Vargas
17 and Jaime Juarez maintained a sexual relationship. Before Deputy Cenicerros joined the SAO team, she
18 remarked to Plaintiff in the locker room that she knew that she was going to the SAO team, at time
19 before Plaintiff knew about that opening, which was not announced at CPT. Sgt. Barragan, who at the
20 time was the SAO Sgt., was sexually interested in Cenicerros and had repeatedly expressed interest in
21 taking Cenicerros on a date.

22 25. On January 21, 2020, Plaintiff received an email from Sgt. Ford related to SAO Team
23 openings. Plaintiff was relieved to have finally been selected for the SAO position on February 10, 2020
24 along with Deputies Eric Sandoval (who was the brother of an influential member of The Executioners)
25 and his partner, Deputy Sonny Solumna. Plaintiff was thrilled to be able to apply her anti-human
26 trafficking expertise from Operation Safe Jails to her new assignment at CPT SAO. But this excitement
27 was short-lived.

1 26. In April 2020, Plaintiff learned that Deputy Cenicerros was slated to leave the SAO Team.
2 Plaintiff was surprised to see a schedule for May 2020 posted outside the Watch Sergeant’s office that
3 showed that Cenicerros was no longer on the SAO team, and was assigned to the PM patrol shift. Plaintiff
4 was surprised to learn about Deputy Cenicerros’s proposed reassignment in this way because neither
5 Cenicerros nor the SAO Team command mentioned Cenicerros’s departure to Plaintiff.

6 27. In May 2020, Plaintiff discovered that Deputy Cenicerros was not leaving the SAO team,
7 Plaintiff was. Plaintiff was advised that she was being removed from the SAO Team due to budget cuts.
8 Plaintiff did not believe this explanation and confronted the SAO Team Lieutenant Craig Walker about
9 the reason for her demotion. Plaintiff protested and pointed out the fact that less qualified and less senior
10 Deputies were being retained on the SAO Team. Plaintiff is informed and believes, and thereupon
11 alleges that the only reason she was dismissed from the SAO Team was that the other seven members
12 of the CPT SAO Team were Executioners, prospects, associates, or romantic partners of Executioners.
13 Of the three Deputies who had been most recently promoted to the SAO Team, only Plaintiff was being
14 removed. Plaintiff escalated her complaint to Station Captain La Tonya Clark. Captain Clark promised
15 Plaintiff the first pick for a future SAO Team position, and as an alternative, offered Plaintiff an
16 opportunity to transfer to the CPT Youth Activities League (“YAL”). Plaintiff considered the transfer
17 to YAL, but eventually refused, as YAL was a career dead-end for largely African American Deputies
18 who had been shut out of opportunities at CPT due to the domination of the Station by The Executioners
19 and their enablers. Notably, Deputies Eric Sandoval and Sonny Solumna, who had joined the SAO Team
20 at the same time as Plaintiff, were not removed from the SAO Team.

21 28. Plaintiff’s hopes of being restored to her SAO Team position were raised in June 2020,
22 when Deputies Edgar Cuevas (Executioner) and David Navarrete were removed from the SAO team
23 because of a use of force incident captured on video behind a Warehouse Shoe Store in Compton.
24 However, Plaintiff was again passed over, and less qualified and less senior Deputies were assigned to
25 the SAO Team despite the assurances by Captain Clark that this would not happen again. Deputies
26 Nestor Sandoval (the brother of an Executioner) and Charlie Garzon were promoted to the SAO Team
27 over Plaintiff. When Plaintiff confronted Captain Clark about this development, Captain Clark told an
28 incredulous Plaintiff that the Plaintiff “was not the best fit” for the SAO Team, and was perceived as

1 having a “standoffish” attitude. Both these allegations were false. As disappointing and frustrating as
2 this was, this conversation took a turn for the worse.

3 29. Captain Clark then accused Plaintiff of having knowingly permitted a gang member to
4 escape from custody during a warrant execution at an illegal marijuana dispensary while Plaintiff was
5 still attached to the SAO Team. The specific allegation was that Plaintiff instructed another Deputy to
6 release the purported gang member from the back of a patrol car because Plaintiff knew him. Not only
7 did this never happen, this attack on Plaintiff’s credibility and professionalism was a total fabrication
8 intended only to prevent her from taking an SAO Team slot that could be provided to an Executioner,
9 prospect, or girlfriend of an Executioner. Plaintiff was severely affected by this accusation, as she has
10 never fraternized with gang members as a Deputy, or before joining the Department and having grown
11 up in the City. Plaintiff’s reputation at the Station as a Deputy of unquestionable character had been
12 destroyed for no reason other than to allow The Executioners to continue to control SAO Team staffing.
13 Tellingly, this false accusation was never documented in an e-mail and was not investigated,
14 administratively or otherwise. This allegation was fabricated by an Executioner and related to Captain
15 Clark. During the conversation with Captain Clark, Captain Clark told Plaintiff that she believed it was
16 odd that someone came to her with this allegation when Plaintiff was already off the SAO team, and
17 stated that the person who related the accusation to her was a “supervisor” who was part of “that group,”
18 meaning the Executioners. Euphemisms aimed at minimizing and obscuring their subject matter are
19 common in the LASD, such as “officer-involved shooting” (which means when a police officer shoots
20 someone), and the terms “group,” “deputy subgroup,” and “clique” are frequently used by LASD
21 personnel to refer to the criminal gangs of deputies such as the Executioners. Eventually, two openings
22 in the SAO team became available, and were filled by the brother of an Executioner.

23 30. During the period of June to August 2020, Deputy Adrian Garcia came back to CPT after
24 having been assigned to the COPS Team. Deputy Garcia was assigned to assist the traffic office and
25 the YAL, both unfunded positions. It was at this time that Plaintiff realized that the story of her removal
26 from the SAO Team because of purported budget constraints was a lie.

27 31. Plaintiff estimates that the majority of women Deputies at CPT have sexual relationships
28 with their supervisors, management, or members of the Executioners, who control the assignment of

1 shifts, days off, work assignments, and partnerships at CPT. The following deputies have or had sexual
2 relationships with the Executioners or Executioners associates and/or prospects, and/or CPT
3 management, or are the objects of prurient interest by the same, and have been professionally rewarded
4 for it: April Avalos, who was given a preferential assignment of the Suspected Child Abuse Report
5 Deputy, and who was more recently asked to fill in as the court filing Deputy, a position held by a
6 detective; Irma Montoya nee Sanchez, who was promoted to the SAO Team over Plaintiff with
7 comparatively less experience and fewer qualifications; Deputy Samantha Cenicerros, who spent much
8 less time relegated to a traffic car than did Plaintiff, who was promoted to the SAO Team over Plaintiff
9 with comparatively less experience and fewer qualifications, and who was retained on the SAO team
10 while Plaintiff was fired in contradiction to a schedule posted outside the Watch Sergeant's office that
11 indicated that Cenicerros was to be removed from the SAO Team, not Plaintiff; Elizabeth Lopez, who
12 was recently given a preferential spot on the Summer crime suppression team. Meanwhile, Deputy Tara
13 Crutchfield, who is Black, like Plaintiff, has been subjected to hazing and discrimination, and Deputy
14 Jessica Barlow, who the Executioners and/or CPT management is not sexually interested in, was left to
15 languish in a traffic car for an inordinate amount of time, just like Plaintiff.

16 32. Plaintiff has been repeatedly harassed on the basis of her race, sex, and sexual orientation
17 at CPT, in addition to the foregoing. As a trainee, Plaintiff was approached by Samuel Aldama and
18 Mizrain Orrego, who told Plaintiff that the Black women who worked at CPT were "bucket" and
19 challenged Plaintiff, telling her that they heard about her, and they wanted to see if she was going to
20 "work Compton or be assigned to Compton." Deputies routinely refer to Black civilians they interact
21 with as "your people" to Plaintiff. When speaking about the Compton street gang the Santana Block
22 Compton Crips, a street gang composed of primarily Black members, Deputy Steven Vasquez referred
23 to the gangsters as "your boys" to Plaintiff. Deputy Vasquez's radio car partner Nick Baray is a
24 confirmed Executioner. Additionally, at one PM shift briefing, the deputies were discussing how people
25 who did not deserve certain positions were being selected over those with experience, Deputy Ortiz,
26 who is now a detective at CPT told Plaintiff, "don't trip, Walker, you're a female, you're Black, and
27 you're gay. You're like a unicorn! You're going to be Captain." Ortiz and other Executioners began to
28 laugh out loud at this. Additionally, Plaintiff was told by a coworker that she should try "penis from a

1 real man.” Additionally, Plaintiff learned about the perks afforded to women who the Executioners
2 and/or CPT management are sexually attracted to when Deputy Samuel Aldama and Deputy Del
3 Castillo, both Executioners, asked her to recruit “hot female deputies” from the CDRF to CPT. Deputy
4 Del Castillo grinned and told Plaintiff “it’s not what you know, it’s who you know.”

5 33. Most recently, Captain Clark repeated her admonition to Plaintiff that she should accept
6 the transfer to YAL. Again, for the reasons cited herein, Plaintiff and refused such a transfer.

7 34. The foregoing acts and omissions by LASD personnel communicated an unequivocal
8 message to Plaintiff: that the way for her to get ahead in the workplace is to engage in sexual conduct
9 with her supervisors or management. The women who were promoted to the SAO team over Plaintiff
10 lacked comparative experience and qualifications, but they would do one thing that Plaintiff would not:
11 be receptive to the sexual advances of Executioners and/or CPT supervisors, such as Rene Barragan.
12 Because Plaintiff is a masculine-presenting lesbian, that was never in the picture for her. This message,
13 which was reiterated when Plaintiff was removed from the SAO team, in contravention of a schedule
14 posted outside the Watch Sergeant’s office, rather than Deputy Cenicerros who was slated for removal
15 from the SAO Team, constituted a hostile work environment and sexual harassment.

16 **No Claims Arising from Privileged Conduct**

17 35. In the avoidance of doubt, Plaintiff does not herein allege any claim for damages as
18 against Defendants for any privileged action, such as the conducting of an investigation by a public
19 entity. Plaintiff, however, reserves the right to claim all damages arising out of *consequences or actions*
20 resulting from, or occasioned by, such a privileged investigation by a public entity.

21 36. Plaintiff expressly excludes from this Complaint any privileged act by any Defendant to
22 this action that would otherwise result in a Special Motion to Strike pursuant to Code Civ. Proc. §
23 425.16.

24 **Applicable Provisions of the County Charter and Civil Service Rules**

25 37. Los Angeles Civil Service Rule 25 states that: “*No person in the classified service or*
26 *seeking admission thereto shall be appointed, reduced or removed, or in any way favored or*
27 *discriminated against in employment or opportunity for employment because of race, color, religion,*
28 *sex, physical handicap, medical condition, marital status, age, national origin or citizenship, ancestry,*

1 *political opinions or affiliations, organizational membership or affiliation, or other non-merit factors,*
2 *any of which are not substantially related to successful performance of the duties of the position. "Non-*
3 *merit factors" are those factors that relate exclusively to a personal or social characteristic or trait and*
4 *are not substantially related to successful performance of the duties of the position. Any person who*
5 *appeals alleging discrimination based on a non-merit factor must name the specific non-merit factor(s)*
6 *on which discrimination is alleged to be based. No hearing shall be granted, nor evidence heard relative*
7 *to discrimination based on unspecified non-merit factors. "*

8 38. Section 30 of the Los Angeles County Charter states the following: *"The purpose of this*
9 *article is to establish a Civil Service System for the classified service which shall provide County*
10 *government with a productive, efficient, stable, and representative work force by: (1) Recruiting,*
11 *selecting, and advancing employees on the basis of their relative ability, knowledge, and skills relevant*
12 *to the work to be performed. (2) Retaining employees on the basis of the adequacy of their performance,*
13 *correcting inadequate performance, and separating employees whose inadequate performance cannot*
14 *be corrected."*

15 39. Further, Plaintiff's supervisors exercise of undue command influence violated the
16 following statutes and regulations: (1) Los Angeles County Policy of Equity, Policies, Procedures and
17 Guidelines § 910 on cooperation with administrative investigations; (2) Los Angeles County Board of
18 Supervisors Policy Manual 9.020 on employee accountability; (3) Los Angeles County Board of
19 Supervisors Policy Manual 9.010 on Equal Employment Opportunity and Non-Discrimination; (4) Los
20 Angeles County Civil Service Rule 25 on merit system employment; (5) Los Angeles County Code 5.08
21 on equal employment opportunity; (6) Los Angeles County Code 5.10 on the policy of diversity; (7) Los
22 Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/005.00 –
23 Accountability; (8) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule
24 No. 3-01/010.40 – Authority of Rank; (9) Los Angeles County Sheriff's Department Manual of Policies
25 and Procedures Rule No. 3-01/010.50 – Manner of Exercising Authority; (10) Los Angeles County
26 Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/010.62 – Managers and
27 Supervisors Orders; (11) Los Angeles County Sheriff's Department Manual of Policies and Procedures
28 Rule No. 3-01/020.05 – Extent of Supervision; (12) Los Angeles County Sheriff's Department Manual

1 of Policies and Procedures Rule No. 3-01/020.30 – Responsibility for Subordinate Supervisors; (13) Los
2 Angeles County Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/020.35 –
3 Organizational Control; (14) Los Angeles County Sheriff’s Department Manual of Policies and
4 Procedures Rule No. 3-01/020.55 – Manner of Giving Orders and Instructions; (15) Los Angeles County
5 Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/020.60 – Responsibility for
6 Subordinates; (16) Los Angeles County Sheriff’s Department Manual of Policies and Procedures Rule
7 No. 3-01/020.61 – Welfare of Subordinates; (17) Los Angeles County Sheriff’s Department Manual of
8 Policies and Procedures Rule No. 3-01/020.62 – Relationship with Subordinates; (18) Los Angeles
9 County Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/020.63 Evaluation of
10 Subordinates’ Work; (19) Los Angeles County Sheriff’s Department Manual of Policies and Procedures
11 Rule No. 3-01/020.70 – Responsibility for Conduct of Subordinates; (20) Los Angeles County Sheriff’s
12 Department Manual of Policies and Procedures Rule No. 3-01/020.80 – Conformance with Department
13 Manual of Policy and Procedures; (21) Los Angeles County Sheriff’s Department Manual of Policies
14 and Procedures Rule No. 3-01/030.07 – Immoral Conduct; (22) Los Angeles County Sheriff’s
15 Department Manual of Policies and Procedures Rule No. 3-01/030.05 – General Behavior; (23) Los
16 Angeles County Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/030.10 –
17 Obedience to Laws, Regulations, and Orders; (24) Los Angeles County Sheriff’s Department Manual
18 of Policies and Procedures Rule No. 3-01/030.13 – Relationships and Mentoring; (25) Los Angeles
19 County Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/030.23 – Workplace
20 Violence; (26) Los Angeles County Sheriff’s Department Manual of Policies and Procedures Rule No.
21 3-01/030.26 – Violation of Workplace Violence Policy; (27) Los Angeles County Sheriff’s Department
22 Manual of Policies and Procedures Rule No. 3-01/030.27 – Retaliation; (28) Los Angeles County
23 Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/030.28 – Reporting of
24 Workplace Violence and/or Retaliation; (29) Los Angeles County Sheriff’s Department Manual of
25 Policies and Procedures Rule No. 3-01/030.29 – Supervisor Responsibilities; (30) Los Angeles County
26 Sheriff’s Department Manual of Policies and Procedures Rule No. 3-01/030.34 – During the
27 Investigation; (31) Los Angeles County Sheriff’s Department Manual of Policies and Procedures Rule
28 No. 3-01/030.37 – Unnecessary/Inappropriate Interference in an Investigation; (32) Los Angeles County

1 Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/030.75 – Bribes, Rewards,
2 Loans, Gifts, Favors; (33) Los Angeles County Sheriff's Department Manual of Policies and Procedures
3 Rule No. 3-01/030.85 – Derogatory Language; (34) Los Angeles County Sheriff's Department Manual
4 of Policies and Procedures Rule No. 3-01/040.65 – Tampering with Evidence; (35) Los Angeles County
5 Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/040.69 – Honesty Policy; (36)
6 Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/040.70 –
7 Dishonesty/False Statements; (37) Los Angeles County Sheriff's Department Manual of Policies and
8 Procedures Rule No. 3-01/040.75 – Dishonest/Failure to Make Statements and/or Making False
9 Statements During Departmental Internal Investigations; (38) Los Angeles County Sheriff's Department
10 Manual of Policies and Procedures Rule No. 3-01/040.76 – Obstructing an Investigation/Influencing a
11 Witness; (39) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No.
12 3-01/040.90 – Reporting Information; (40) Los Angeles County Sheriff's Department Manual of
13 Policies and Procedures Rule No. 3-01/050.05 – Performance of Duty; (41) Los Angeles County
14 Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/050.10 – Performance to
15 Standards; and (42) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule
16 No. 3-01/050.15 – Duties of Deputy Personnel; (43) California Fair Employment and Housing Act; (44)
17 Veh. Code § 41602; (45) Los Angeles Civil Service Rule 25; (46) Section 30 of the Los Angeles County
18 Charter.

19 40. The facilitation, promotion of, and enabling of, and permitting to exist and to operate the
20 illegal Executioners gang by LASD violated Los Angeles County Sheriff's Department Manual of
21 Policies and Procedures Rule No. 3-01/050.83 – Employee Groups which Violate Rights of Other
22 Employees or Members of Public. This rule imposes a mandatory duty on the County of Los Angeles to
23 bar participation in deputy gangs like the Executioners. Specifically, this rule provides that "Department
24 personnel shall not participate or join in any group of Department employees which promotes conduct
25 that violates the rights of other employees or members of the public. Participation in these illicit groups,
26 herein referred to as "deputy cliques" or "subgroups" which often include an associated symbol and/or
27 tattoo, harms morale and erodes public trust. These groups undermine the Department's goals and can
28 create a negative public perception of the Department, increasing the risk of civil liability to the

1 Department and involved personnel. Any employee engaging in misconduct of any kind, including but
2 not limited to, the use of excessive force or mistreating or harassing others, will be subject to
3 discipline. If the misconduct involves criminal allegations, the matter may be referred to the District
4 Attorney's Office for possible prosecution. All personnel will be held accountable for this
5 policy. Failure to adhere to this policy may subject violators to discipline under the MPP, including
6 sections 3-01/030.05, General Behavior, 3-01/030.73, Hazing, and 3-01/050.10, Performance to
7 Standards" (emphasis added). In the avoidance of doubt, the Executioners gang is one of the ""deputy
8 cliques" or "subgroups"" referred to in the above rule, and the terms "deputy clique" and "deputy
9 subgroups" are euphemisms that the County of Los Angeles has adopted for the purpose of hiding,
10 obscuring, obfuscating, and minimizing the decades-old problem of illegal gangs composed of sworn
11 law enforcement officers existing within the Sheriff's Department, which have been widely publicized
12 despite the Department's best efforts to obfuscate and minimize them. Rule 3-01/050.83 is designed to
13 protect against the abuse of Sheriff's Department employees by other Sheriff's Department employees
14 who are associated with criminal gangs composed of Sheriff's Department employees. The existence of
15 deputy gangs is tolerated, and on information and belief is actually condoned, by the highest levels of
16 the Sheriff's Department. The Sheriff's Department has willfully refused to obey the mandate of its own
17 Rule No. 3-01/050.83. Rule No. 3-01/050.83 is aimed at preventing the kind of harm that Plaintiff
18 suffered as set forth in this Complaint. The Sheriff's Department breached The Sheriff's Department's
19 failure to heed the mandate of Rule No. 3-01/050.83 is the proximate cause of Plaintiff's harms.

20 41. Labor Code § 1102.5 provides in relevant part as follows: "An employer, or any person
21 acting on behalf of the employer, shall not retaliate against an employee for disclosing information, or
22 because the employer believes that the employee disclosed or may disclose information, to a government
23 or law enforcement agency, to a person with authority over the employee or another employee who has
24 the authority to investigate, discover, or correct the violation or noncompliance, or for providing
25 information to, or testifying before, any public body conducting an investigation, hearing, or inquiry, if
26 the employee has reasonable cause to believe that the information discloses a violation of state or federal
27 statute, or a violation of or noncompliance with a local, state, or federal rule or regulation, regardless of
28 whether disclosing the information is part of the employee's job duties." This duty is mandatory and is

1 aimed at preventing the kind of harm that Plaintiff complains of in this Complaint. LASD personnel at
2 CPT breached this duty by retaliating against Plaintiff for reporting violations of law to her superiors.
3 Such breach is a proximate cause of Plaintiff's harms.

4 42. Government Code section 12940 provides in relevant parts as follows "It is an unlawful
5 employment practice, unless based upon a bona fide occupational qualification, or, except where based
6 upon applicable security regulations established by the United States or the State of California: . . . For
7 an employer, because of the race, religious creed, color, national origin, ancestry, physical disability,
8 mental disability, medical condition, genetic information, marital status, sex, gender, gender identity,
9 gender expression, age, sexual orientation, or veteran or military status of any person, to refuse to hire
10 or employ the person or to refuse to select the person for a training program leading to employment, or
11 to bar or to discharge the person from employment or from a training program leading to employment,
12 or to discriminate against the person in compensation or in terms, conditions, or privileges of
13 employment. . . . For any employer, labor organization, employment agency, or person to discharge,
14 expel, or otherwise discriminate against any person because the person has opposed any practices
15 forbidden under this part or because the person has filed a complaint, testified, or assisted in any
16 proceeding under this part. . . . For an employer, labor organization, employment agency, apprenticeship
17 training program or any training program leading to employment, or any other person, because of race,
18 religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition,
19 genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual
20 orientation, or veteran or military status, to harass an employee, an applicant, an unpaid intern or
21 volunteer, or a person providing services pursuant to a contract. . . ." These duties are mandatory and
22 are aimed at preventing the kind of harm that Plaintiff complains of in this Complaint. LASD personnel
23 breached these duties by harassing, discriminating, and retaliating against Plaintiff. Such breaches are
24 proximate causes of Plaintiff's harms.

25 **Exhaustion of Administrative Remedies**

26 43. Plaintiff presented a Government Tort Claim to COLA on December 30, 2020. COLA
27 failed to approve or deny the claim within 45 days, and thus the claim was deemed denied by operation
28

1 of law on February 13, 2021, and this lawsuit has been brought within 2 years of the accrual of the tort
2 causes of action existing in favor of Plaintiff pursuant to Gov. Code § 945.6(a)(2).

3 44. A Right-to-Sue Letter was timely obtained from the Department of Fair Employment and
4 Housing on March 3, 2020 on behalf of Plaintiff. A true and correct copy of this Right-to-Sue Letter is
5 heretofore attached as “**EXHIBIT 1**”.

6 **FIRST CAUSE OF ACTION**

7 **FEHA DISPARATE TREATMENT DISCRIMINATION**

8 **Gov. Code § 12940(a)**

9 **(Against All Defendants)**

10 45. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
11 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
12 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

13 46. Defendants were employers for purposes of California law, and Plaintiff was an
14 employee of Defendants.

15 47. Defendants subjected Plaintiff to one or more of the following adverse employment
16 actions: (1) asked impermissible non-job-related questions; (2) demoted; (3) denied any employment
17 benefit or privilege; (4) denied hire or promotion; (5) denied or forced to transfer; (6) denied work
18 opportunities or assignments; (7) reprimanded.

19 48. Defendants’ substantial motivating reason(s) for taking these adverse employment
20 actions against Plaintiff was one or more of the following discriminatory bases which were applicable
21 to Plaintiff: (1) color; (2) gender identity or expression; (3) race; (4) sex/gender; (5) sexual harassment
22 (hostile environment); (6) sexual orientation.

23 49. Plaintiff was harmed as a result of these adverse employment actions.

24 50. Defendants’ decision to impose adverse employment actions upon Plaintiff was a
25 substantial factor in causing this harm to Plaintiff.

1 **SECOND CAUSE OF ACTION**

2 **FEHA WORK ENVIRONMENT HARASSMENT**

3 **Gov. Code § 12940(j)**

4 **(Against All Defendants)**

5 51. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
6 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
7 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

8 52. Defendants were employers for purposes of California law, and Plaintiff was an
9 employee of Defendants.

10 53. Plaintiff was subjected to unwanted harassing conduct arising out of the following
11 protected bases applicable to Plaintiff: (1) color; (2) gender identity or expression; (3) race; (4)
12 sex/gender; (5) sexual harassment (hostile environment); (6) sexual orientation.

13 54. The harassing conduct was severe or pervasive.

14 55. A reasonable person in Plaintiff's circumstances would have considered the work
15 environment to be hostile, intimidating, offensive, oppressive, or abusive.

16 56. Plaintiff considered the work environment to be hostile, intimidating, offensive,
17 oppressive, or abusive.

18 57. Supervisors engaged in the conduct. Defendants and/or their supervisors and agents
19 knew, or should have known, of the conduct and failed to take immediate and appropriate corrective
20 action.

21 58. Plaintiff was harmed, and Defendants' conduct was a substantial factor in causing
22 Plaintiff's harm.

23 //

24 //

25 //

1 **THIRD CAUSE OF ACTION**

2 **FEHA SEXUAL FAVORITISM HARASSMENT**

3 **Gov. Code §§ 12923 & 12940(j)**

4 **(Against All Defendants)**

5 59. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
6 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
7 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

8 60. Defendants were employers for purposes of California law, and Plaintiff was an
9 employee of Defendants.

10 61. There was sexual favoritism in the work environment, and the sexual favoritism was
11 severe or pervasive.

12 62. A reasonable individual in Plaintiff's circumstances, with the same FEHA protected
13 characteristics as Plaintiff, would have considered the work environment to be hostile, intimidating,
14 offensive, oppressive, or abusive because of the sexual favoritism.

15 63. Plaintiff considered the work environment to be hostile, intimidating, offensive,
16 oppressive, or abusive because of the sexual favoritism.

17 64. A supervisor engaged in the sexual favoritism, or the supervisors or agents of Defendants
18 knew or should have known of the sexual favoritism and failed to take immediate and appropriate
19 corrective action.

20 Plaintiff was harmed, and Defendants' conduct was a substantial factor in causing Plaintiff's harm.

21 **FOURTH CAUSE OF ACTION**

22 **FEHA RETALIATION**

23 **Gov. Code § 12940(h)**

24 **(Against All Defendants)**

25 65. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
26 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
27 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

1 66. Defendants were employers for purposes of California law, and Plaintiff was an
2 employee of Defendants.

3 67. Plaintiff was retaliated against on account of one or more of the following protected bases
4 applicable to Plaintiff: (1) participated as a witness in a discrimination or harassment complaint; (2)
5 reported or resisted any form of discrimination or harassment.

6 68. Defendants subjected Plaintiff to the following adverse employment actions as a result:
7 (1) asked impermissible non-job-related questions; (2) demoted; (3) denied any employment benefit or
8 privilege; (4) denied hire or promotion; (5) denied or forced to transfer; (6) denied work opportunities
9 or assignments; (7) reprimanded.

10 69. Defendants' decision to subject Plaintiff to these adverse employment actions was based
11 upon Plaintiff having engaged in one or more of the following protected activities: (1) participated as a
12 witness in a discrimination or harassment complaint; or (2) reported or resisted any form of
13 discrimination or harassment.

14 70. Plaintiff was harmed, as a result of these adverse employment actions.
15 Defendants' decision to subject Plaintiff to these adverse employment actions was a substantial factor
16 in causing this harm to Plaintiff.

17 **FIFTH CAUSE OF ACTION**

18 **FEHA FAILURE TO PREVENT HARASSMENT, DISCRIMINATION, OR RETALIATION**

19 **Gov. Code § 12940(k)**

20 **(Against All Defendants)**

21 71. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
22 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
23 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

24 72. Defendants were employers for purposes of California law, and Plaintiff was an
25 employee of Defendants.

26 73. Plaintiff was subjected to harassment, discrimination, or retaliation in the course of
27 employment.

28

1 74. Defendants failed to take all reasonable steps to prevent the harassment, discrimination,
2 or retaliation.

3 75. Plaintiff was harmed, and Defendants' failure to take all reasonable steps to prevent the
4 harassment, discrimination, or retaliation was a substantial factor in causing Plaintiff's harm.

5 **SIXTH CAUSE OF ACTION**

6 **UNLAWFUL RETALIATION**

7 **Lab. Code § 1102.5**

8 **(Against All Defendants)**

9 76. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
10 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
11 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

12 77. Lab. Code § 1102.5(b) provides, in pertinent part, "[a]n employer, or any person acting
13 on behalf of the employer, shall not retaliate against an employee for disclosing information, or because
14 the employer believes that the employee disclosed or may disclose information, to a government or law
15 enforcement agency, to a person with authority over the employee or another employee who has the
16 authority to investigate, discover, or correct the violation or noncompliance, . . . if the employee has
17 reasonable cause to believe that the information discloses a violation of state or federal statute, or a
18 violation of or noncompliance with a local, state, or federal rule or regulation, regardless of whether
19 disclosing the information is part of the employee's job duties." This statute reflects the broad public
20 policy interest in encouraging workplace whistleblowers to report unlawful acts without fearing
21 retaliation.

22 78. Defendants were employers for purposes of California law, and Plaintiff was an
23 employee of Defendants.

24 79. Defendants subjected Plaintiff to the following adverse employment actions: (1) asked
25 impermissible non-job-related questions; (2) demoted; (3) denied any employment benefit or privilege;
26 (4) denied hire or promotion; (5) denied or forced to transfer; (6) denied work opportunities or
27 assignments; (7) reprimanded.
28

1 80. Defendants subjected Plaintiff to the foregoing adverse employment actions in retaliation
2 for engaging in protected activities, including, but not limited to: (1) Los Angeles County Policy of
3 Equity, Policies, Procedures and Guidelines § 910 on cooperation with administrative investigations;
4 (2) Los Angeles County Board of Supervisors Policy Manual 9.020 on employee accountability; (3) Los
5 Angeles County Board of Supervisors Policy Manual 9.010 on Equal Employment Opportunity and
6 Non-Discrimination; (4) Los Angeles County Civil Service Rule 25 on merit system employment; (5)
7 Los Angeles County Code 5.08 on equal employment opportunity; (6) Los Angeles County Code 5.10
8 on the policy of diversity; (7) Los Angeles County Sheriff's Department Manual of Policies and
9 Procedures Rule No. 3-01/005.00 – Accountability; (8) Los Angeles County Sheriff's Department
10 Manual of Policies and Procedures Rule No. 3-01/010.40 – Authority of Rank; (9) Los Angeles County
11 Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/010.50 – Manner of Exercising
12 Authority; (10) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No.
13 3-01/010.62 – Managers and Supervisors Orders; (11) Los Angeles County Sheriff's Department
14 Manual of Policies and Procedures Rule No. 3-01/020.05 – Extent of Supervision; (12) Los Angeles
15 County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/020.30 – Responsibility
16 for Subordinate Supervisors; (13) Los Angeles County Sheriff's Department Manual of Policies and
17 Procedures Rule No. 3-01/020.35 – Organizational Control; (14) Los Angeles County Sheriff's
18 Department Manual of Policies and Procedures Rule No. 3-01/020.55 – Manner of Giving Orders and
19 Instructions; (15) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule
20 No. 3-01/020.60 – Responsibility for Subordinates; (16) Los Angeles County Sheriff's Department
21 Manual of Policies and Procedures Rule No. 3-01/020.61 – Welfare of Subordinates; (17) Los Angeles
22 County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/020.62 – Relationship
23 with Subordinates; (18) Los Angeles County Sheriff's Department Manual of Policies and Procedures
24 Rule No. 3-01/020.63 Evaluation of Subordinates' Work; (19) Los Angeles County Sheriff's
25 Department Manual of Policies and Procedures Rule No. 3-01/020.70 – Responsibility for Conduct of
26 Subordinates; (20) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule
27 No. 3-01/020.80 – Conformance with Department Manual of Policy and Procedures; (21) Los Angeles
28 County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/030.07 – Immoral

1 Conduct; (22) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No.
2 3-01/030.05 – General Behavior; (23) Los Angeles County Sheriff's Department Manual of Policies and
3 Procedures Rule No. 3-01/030.10 – Obedience to Laws, Regulations, and Orders; (24) Los Angeles
4 County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/030.13 – Relationships
5 and Mentoring; (25) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule
6 No. 3-01/030.23 – Workplace Violence; (26) Los Angeles County Sheriff's Department Manual of
7 Policies and Procedures Rule No. 3-01/030.26 – Violation of Workplace Violence Policy; (27) Los
8 Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/030.27 –
9 Retaliation; (28) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No.
10 3-01/030.28 – Reporting of Workplace Violence and/or Retaliation; (29) Los Angeles County Sheriff's
11 Department Manual of Policies and Procedures Rule No. 3-01/030.29 – Supervisor Responsibilities;
12 (30) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/030.34
13 – During the Investigation; (31) Los Angeles County Sheriff's Department Manual of Policies and
14 Procedures Rule No. 3-01/030.37 – Unnecessary/Inappropriate Interference in an Investigation; (32)
15 Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/030.75 –
16 Bribes, Rewards, Loans, Gifts, Favors; (33) Los Angeles County Sheriff's Department Manual of
17 Policies and Procedures Rule No. 3-01/030.85 – Derogatory Language; (34) Los Angeles County
18 Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/040.65 – Tampering with
19 Evidence; (35) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No.
20 3-01/040.69 – Honesty Policy; (36) Los Angeles County Sheriff's Department Manual of Policies and
21 Procedures Rule No. 3-01/040.70 – Dishonesty/False Statements; (37) Los Angeles County Sheriff's
22 Department Manual of Policies and Procedures Rule No. 3-01/040.75 – Dishonest/Failure to Make
23 Statements and/or Making False Statements During Departmental Internal Investigations; (38) Los
24 Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/040.76 –
25 Obstructing an Investigation/Influencing a Witness; (39) Los Angeles County Sheriff's Department
26 Manual of Policies and Procedures Rule No. 3-01/040.90 – Reporting Information; (40) Los Angeles
27 County Sheriff's Department Manual of Policies and Procedures Rule No. 3-01/050.05 – Performance
28 of Duty; (41) Los Angeles County Sheriff's Department Manual of Policies and Procedures Rule No. 3-

1 01/050.10 – Performance to Standards; and (42) Los Angeles County Sheriff’s Department Manual of
2 Policies and Procedures Rule No. 3-01/050.15 – Duties of Deputy Personnel; (43) California Fair
3 Employment and Housing Act; (44) Veh. Code § 41602; (45) Los Angeles Civil Service Rule 25; (46)
4 Section 30 of the Los Angeles County Charter.

5 **SEVENTH CAUSE OF ACTION**

6 **PUBLIC ENTITY LIABILITY FOR FAILURE TO PERFORM MANDATORY DUTY (Gov’t.**

7 **Code § 815.6)**

8 **(Against Defendant County of Los Angeles)**

9 81. Plaintiff realleges, and incorporates herein by their reference, each and every allegation
10 contained in the foregoing Paragraphs, inclusive, as though fully set forth herein. Further, all allegations
11 set forth in this cause of action are pled upon information and belief, unless otherwise stated.

12 82. The County of Los Angeles is liable as provided by Cal. Gov’t. Code § 815.6 for failure
13 to perform a mandatory duty.

14 83. Defendants violated the law by permitting a violent Deputy gang to control the day-to-
15 day affairs of Compton Station in violation of California law and Los Angeles County Sheriff’s
16 Department Manual of Policies and Procedures Rule No. 3-01/050.83 – Employee Groups which Violate
17 Rights of Other Employees or Members of Public, the California Fair Employment and Housing Act,
18 and Lab. Code § 1102.5.

19 Plaintiff was harmed, and Defendants’ failure to perform their duties were a substantial factor in causing
20 Plaintiff’s harm.

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EXHIBIT 1



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 3, 2021

Alan Romero
80 S. Lake Avenue, Suite 880
Pasadena, CA 91101

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 202103-12778103
Right to Sue: Walker / County of Los Angeles et al.

Dear Alan Romero:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, DFEH will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 3, 2021

RE: **Notice of Filing of Discrimination Complaint**
DFEH Matter Number: 202103-12778103
Right to Sue: Walker / County of Los Angeles et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

This matter may qualify for DFEH's Small Employer Family Leave Mediation pilot program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in DFEH's free voluntary mediation service. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in DFEH's free voluntary mediation service. A request for mediation must be made within 30 days of receipt of the Notice of Case Closure and Right to Sue. If mediation is requested, the employee is prohibited from filing a civil action until mediation is complete. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from DFEH's receipt of a mediation request under section 12945.21 until mediation is complete. To request DFEH Small Employer Family Leave Mediation, email DRDOnlineRequests@dfeh.ca.gov and include the DFEH matter number indicated on the Right to Sue notice.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 3, 2021

Latosha Walker
80 S. Lake Avenue, Suite 880
Pasadena, California 91101

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 202103-12778103
Right to Sue: Walker / County of Los Angeles et al.

Dear Latosha Walker:

This letter informs you that the above-referenced complaint filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 3, 2021 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

This matter may qualify for DFEH's Small Employer Family Leave Mediation pilot program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in DFEH's free voluntary mediation service. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in DFEH's free voluntary mediation service. A request for mediation must be submitted to the DFEH within 30 days of receipt of the Notice of Case Closure and Right to Sue. If mediation is requested, the employee is prohibited from filing a civil action until mediation is complete. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from DFEH's receipt of a mediation request under section 12945.21 until mediation is complete. To request DFEH Small Employer Family Leave Mediation, email DRDOnlineRequests@dfeh.ca.gov and include the DFEH matter number indicated on the Right to Sue notice.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
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Department of Fair Employment and Housing

1 **COMPLAINT OF EMPLOYMENT DISCRIMINATION**
2 **BEFORE THE STATE OF CALIFORNIA**
3 **DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**
4 **Under the California Fair Employment and Housing Act**
5 **(Gov. Code, § 12900 et seq.)**

6 **In the Matter of the Complaint of**

7 Latosha Walker

DFEH No. 202103-12778103

8 Complainant,

9 vs.

10 County of Los Angeles
11 301 S. Willowbrook Avenue
12 Compton, California 90220

13 Renee Barragan
14 301 S. Willowbrook Avenue
15 Compton, California 90220

16 La Tonya Clark
17 301 S. Willowbrook Avenue
18 Compton, California 90220

19 Respondents

20 **1. Respondent County of Los Angeles is an employer County of Los Angeles** subject to
21 suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et
22 seq.).

23 **2. Complainant is naming Renee Barragan** individual as Co-Respondent(s).
24 Complainant is naming **La Tonya Clark** individual as Co-Respondent(s).

25 **3. Complainant Latosha Walker, resides in the City of Pasadena, State of California.**

26 **4. Complainant alleges that on or about March 3, 2021, respondent took the**
27 following adverse actions:

28 **Complainant was harassed** because of complainant's race, color, sex/gender, gender
identity or expression, sexual orientation, sexual harassment- hostile environment.

Complainant was discriminated against because of complainant's race, color,
sex/gender, gender identity or expression, sexual orientation, sexual harassment- hostile

1 environment and as a result of the discrimination was denied hire or promotion,
2 reprimanded, demoted, asked impermissible non-job-related questions, denied any
3 employment benefit or privilege, denied work opportunities or assignments, denied or forced
4 to transfer.

5 **Complainant experienced retaliation** because complainant reported or resisted any form
6 of discrimination or harassment, participated as a witness in a discrimination or harassment
7 complaint and as a result was denied hire or promotion, reprimanded, demoted, asked
8 impermissible non-job-related questions, denied any employment benefit or privilege, denied
9 work opportunities or assignments, denied or forced to transfer.

10 **Additional Complaint Details:** Claimant is a decorated Deputy with the Los Angeles
11 County Sheriff's Department, who commenced her employment with the County of Los
12 Angeles ("COLA") in October 2012. Claimant grew up in the City of Compton, where she is
13 now a Deputy at Compton Station ("CPT"). Claimant is a model Deputy, whose meaningful
14 and valuable contributions to her community have been formally recognized by the Anti-
15 Defamation League and the Long Beach City Prosecutor's Office, among others.

16 Claimant first arrived at CPT in August 2016, remaining in training until February 2017. In
17 March 2017, Claimant was involved in an on-duty traffic collision and was off of work
18 recuperating until approximately January 2018.

19 On or about January 2018, Claimant was assigned to the PM Shift in a traffic car, where she
20 remained during the year. While in the Traffic Car, Claimant was required to take crime calls
21 in addition to her traffic calls. Since Claimant was not a member or prospect of The
22 Executioners group which dominated the PM shift at CPT, Claimant was ostracized by the
23 group and spent the year eating by herself and with no socialization with her fellow
24 Deputies. Claimant later learned that prospects for Executioners membership, or female
25 Deputies who agreed to have sex with tattooed ("inked") members of The Executioners,
26 were given preferential treatment when given patrol assignments. Since Claimant is African
27 American and is a gay woman, whose gender identity/expression is masculine, these
28 "perks" were foreclosed to Claimant, as The Executioners does not allow African-American
members and the group only provides "perks" to females who engage in sexual
relationships with inked members of the group. This was the beginning of years of
mistreatment of Claimant as a result of her race and sexual orientation at CPT, with the tacit
support and cooperation of her supervisors.

During 2018, while Claimant was relegated to the Traffic Car, she was passed over for a
position she was qualified for in favor of a heterosexual female. Deputy Irma Sanchez, wife
of former CPT Field Training Officer Frank Montoya (now MFTO at Cerritos Station), was
awarded a desirable transfer to the SAO Team. This was improper in that Deputy Sanchez
had just finished her training, while Claimant enjoyed seniority in peace officer status, station
time, and experience. There was no proper basis for this preference demonstrated towards
Deputy Sanchez over Claimant. This was the first instance of Claimant being denied a
position that was given to a less senior and less qualified Deputy as a result of her race and
sexual orientation. Soon after Claimant was reassigned from the Traffic Car, Sergeant

1 Renee Barragan offered to transfer Claimant to the Compton Town Center, but Claimant
2 refused as this was an undesirable assignment. Claimant understood that the purpose of
3 this prospective assignment was to allow Sgt. Barragan to reassign two Executioners
4 prospects, Deputies Miguel Vega, and Christopher Hernandez, to a Crime Car.

5 Claimant was, and is, a highly motivated and hardworking Deputy whose intent was to
6 participate in the SAO Team while at CPT in order to shift to a position with the CPT
7 Detective Bureau as part of the natural career progression of a similarly situated patrol
8 Deputy of Claimant's caliber, work quality, and motivation. An assignment to SAO is highly
9 desirable as it gives Deputies additional experience with search warrants as part of the
10 Detective career track. The CPT SAO Team was tasked with dealing with human trafficking
11 in the City of Compton, and this made Claimant unusually well-qualified for the assignment,
12 as she had worked Operation Safe Jails (gang intelligence) and had experience working
13 with victims of human trafficking, and as discussed above, had previously been awarded
14 and recognized for the consistently high quality of her work by both the Anti-Defamation
15 League and the Long Beach City Prosecutor's Office.

16 In September 2019, Claimant learned that a SAO Team position had become available for
17 which Claimant was the best and most qualified for. However, upon inquiring, Claimant
18 learned that the position had again been given to a less qualified and less experienced
19 Deputy: Samantha Cenicerros, who had arrived as a Patrol Deputy at CPT after Claimant.
20 Sgt. Paulette Cain, on behalf of SAO, informed Claimant that the basis for Cenicerros being
21 offered the jobs was "stats," which Claimant took to mean that Deputy Cenicerros had
22 superior arrest statistics to Claimant. This was absolutely false. Claimant is informed and
23 believes that Deputy Cenicerros was rewarded with the SAO position, which included a
24 better schedule, and being assigned to a "no call" car exempt from having to take crime calls
25 for one sole reason: she had agreed to have sex with Deputy Samuel Aldama, an influential
26 member of The Executioners. Further, Deputy Cenicerros was receptive to sexual advances
27 from Sergeant Barragan. Deputy Cenicerros was one of a number of female Deputies who
28 had previously worked at Century Regional Detention Facility ("CRDF") and had been
groomed by high-ranking members of The Executioners to come to CPT and to enjoy work
"perks" if they agreed to have sex with Executioners leadership. Another such female
Deputy, Deputy Iliana Vargas, enjoyed similar perks and preferential assignments, and
exemption from discipline for an act of on-duty cowardice captured on video that resulted in
an Administrative Investigation against her.

On January 21, 2020, Claimant received an email from Sgt. Ford related to SAO Team
openings. Claimant was relieved to have been finally been selected for the SAO position on
February 10, 2020 along with Deputies Eric Sandoval (who was the brother of an influential
member of The Executioners) and his partner, Deputy Sonny Solumna. Claimant was
thrilled to be able to apply her anti-human trafficking expertise from Operation Safe Jails to
her new assignment at CPT SAO. But this excitement was short-lived.

In May 2020, Claimant was advised that she was being removed from the SAO Team due to
"budget cuts." Claimant did not believe this explanation and confronted the SAO Team
Lieutenant Craig Walker about the reason for her demotion. Claimant protested and pointed
out the fact that less qualified and less senior Deputies were being retained on the SAO

1 Team. Claimant is informed and believes, and thereupon alleges that the only reason she
2 was dismissed from the SAO Team was that the other seven members of the CPT SAO
3 Team were Executioners, prospects, associates, or romantic partners of Executioners. Of
4 the three Deputies who had been most recently promoted to the SAO Team, only Claimant
5 was being removed. Claimant escalated her complaint to Station Captain La Tonya Clark.
6 Captain Clark promised Claimant the “first pick” for a future SAO Team position, and as an
7 alternative, offered Claimant an opportunity to transfer to the CPT Youth Activities League
8 (“YAL”). Claimant considered the transfer to YAL, but eventually refused, as YAL was a
9 career dead-end for largely African American Deputies who had been shut out of
10 opportunities at CPT due to the domination of the Station by The Executioners and their
11 enablers.

12 Claimant’s hopes of being restored to her SAO Team position were raised in June 2020,
13 when Deputies Edgar Cuevas (Executioner) and David Navarrete were removed from the
14 SAO team because of a use of force incident captured on video behind a Warehouse Shoe
15 Store in Compton. However, Claimant was again passed over, and less qualified and less
16 senior Deputies were assigned to the SAO Team despite the assurances by Captain Clark
17 that this would not happen again. Deputies Nestor Sandoval (the brother of an Executioner)
18 and Charlie Garzon were promoted to the SAO Team over Claimant. When Claimant
19 confronted Captain Clark about this development, Captain Clark told an incredulous
20 Claimant that the Claimant “was not the best fit” for the SAO Team, and was perceived as
21 having a “standoffish” attitude. Both these allegations were false. As disappointing and
22 frustrating as this was, this conversation took a turn for the worse.

23 Captain Clark then accused Claimant of having knowingly permitted a gang member to
24 escape from custody during a warrant execution at an illegal marijuana dispensary while
25 Claimant was still attached to the SAO Team. The specific allegation was that Claimant
26 instructed another Deputy to release the purported gang member from the back of a patrol
27 car because Claimant “knew him.” Not only did this never happen, this attack on Claimant’s
28 credibility and professionalism was a total fabrication intended only to prevent her from
taking an SAO Team slot that could be provided to an Executioner, prospect, or girlfriend of
an Executioner. Claimant was severely affected by this accusation, as she has never
fraternized with gang members as a Deputy, or before joining the Department and having
grown up in the City. Claimant’s reputation at the Station as a Deputy of unquestionable
character had been destroyed for no reason other than to allow The Executioners to
continue to control SAO Team staffing.

During the period of June to August 2020, Deputy Adrian Garcia came back to CPT after
having been assigned to the COPS Team. Deputy Garcia was assigned to assist the traffic
office and the YAL, both unfunded positions. It was at this time that Claimant realized that
the story of her removal from the SAO Team because of purported budget constraints was a
lie.

In 2018, Claimant began to get very ill, and did not know the reason for her illness, and was
eventually diagnosed with a serious health condition. Claimant is able to perform the
essential functions of her job without accommodations. However, after learning of her
diagnosis, Sgt. Barragan accused Claimant of being unable to perform the job duties as a

1 Deputy. Sgt. Barragan told Claimant that he assumed that she would not be able to spend
2 extended periods of time in the sun, but Claimant corrected Sgt. Barragan by noting that she
3 has spent every day as a Patrol Deputy at CPT in the sun, and provided that she wears
4 sunscreen, long sleeves, and a baseball cap, she will experience no ill effects as a result of
5 her work. Claimant did not miss any work after her health issue became medically
6 controlled.

7 Most recently, Captain Clark repeated her admonition to Claimant that she should accept
8 the transfer to YAL. Again, for the reasons cited herein, Claimant and refused such a
9 transfer.

10 The foregoing bad acts constitute a continuing violation of Claimant's rights under California
11 law that continues to the present day.

12 At all times relevant to the instant Claim, the accused COLA employees were working within
13 the course and scope of their employment as agents of the COLA, with a respondent
14 superior relationship existing as between the employee-agent and the employer-principals.
15 All bad acts alleged to have been undertaken by the bad actors against Claimant were
16 carried out under color of authority, that authority having been vested in them by COLA.
17 Had these bad actors not been employee-agents of COLA, the harms herein alleged would
18 not have transpired, and Claimant would not have been injured.

19 These acts constitute violations of California law, including, but not limited to: Lab. Code §
20 1102.5, and/or the Fair Employment and Housing Act (Gov. Code §§ 12900-12996).
21 Claimant has been damages in an amount to be determined at time of trial. Claimant has
22 experienced economic and non-economic damages in an amount set forth in this claim
23 form. Claimant's damages are ongoing.

1 VERIFICATION

2 I, **Alan Romero**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 3, 2021, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Pasadena, CA

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am a resident of the United States and employed in the County of Los Angeles, State of California, over the age of 18 and not a party to the within action or proceedings; my business address is 80 S. Lake Avenue, Suite 880, Pasadena, CA 91101. On July 12, 2021, I served the following document(s) described as: **FIRST AMENDED COMPLAINT FOR DAMAGES** on the interested parties and/or through their attorneys of record by depositing the original or true copy thereof as designated below, at Pasadena, California, addressed to the following as follows:

Avi Burkwitz, Esq. Gil Burkwitz, Esq. Christine Mardikian, Esq. PETERSON BRADFORD BURKWITZ 100 North First Street, Suite 300 Burbank, CA 91502	ABurkwitz@pbllp.com ahalloran@pbllp.com CMardikian@pbllp.com LKerekesh@pbllp.com CCollazo@pbllp.com khenderson@pbllp.com
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- HAND DELIVERY/PERSONAL SERVICE (C.C.P. §§1011, et seq.):** I caused said document(s) to be personally served on the addressee listed above.
- MAIL (C.C.P. §1013(a)):** I caused said document(s) to be deposited in the United States Mail in a sealed envelope with postage fully prepaid at Pasadena, California, following the ordinary practice at my place of business of collection and processing mail.
- FACSIMILE (C.C.P. §§1012.5, et seq.):** I caused said document(s) to be transmitted to the party or parties listed above at the facsimile number listed above.
- EXPRESS MAIL (C.C.P. §§1013(c)(d), et seq.):** I caused said document(s) to be deposited with an express service carrier in a sealed envelope designed by the carrier as an express mail envelope, with fees and postage prepaid.
- ELECTRONIC MAIL (C.C.P §§1010.6(a)(6)):** I caused said document(s) to be mailed electronically to the party or parties listed above at the email address listed above.
- (STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 12, 2021, at Pasadena, California.



Jennifer Sandoval