

1 GLORIA ALLRED (SBN 65033)
gallred@amglaw.com

2 JOHN S. WEST (SBN 102034)
jwest@amglaw.com

3 **ALLRED, MAROKO & GOLDBERG**
4 6300 Wilshire Blvd., Suite 1500
5 Los Angeles, CA 90048
6 T: 323-653-6530
7 F: 323-653-1660

8 **Attorneys for Plaintiffs RICHARD COREY,**
9 **MATTHEW DAWSON, NICHOLAS**
10 **PETKAS**

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF ORANGE**

13 RICHARD COREY, an individual, and
14 MATTHEW DAWSON, an individual and
15 NICHOLAS PETKAS, an individual

16 Plaintiffs,

17 v.

18 CALIFORNIA DEPARTMENT OF PARKS
19 AND RECREATION, a governmental agency,
20 KEVIN PEARSALL, an individual, and DOES
21 1 through 100, inclusive,

22 Defendants.

Case No.

COMPLAINT FOR DAMAGES

1. Sexual Harassment in Violation of the
California Fair Employment and Housing
Act

2. Gender Discrimination in Violation of
the California Fair Employment and
Housing Act

3. Failure to Prevent Harassment and
Discrimination in Violation of the
California Fair Employment and Housing
Act

23 Plaintiffs hereby allege as follows:

PARTIES

24 1. Plaintiff RICHARD COREY is an individual and a resident of the County of Orange, State
25 of California. He is now and was at all relevant times an employee of the California Department of
26 Parks and Recreation. He joined the Department of Parks and Recreation in May of 2022, and is
27 now a Senior Park Aid assigned to Bolsa Chica State Beach Lifeguard Headquarters (“Bolsa
28 Chica”), which is located at 17851 Pacific Coast Highway, Huntington Beach, California 92648.

1 2. Plaintiff MATTHEW DAWSON is an individual and a resident of the County of Orange,
2 State of California. He is now and was at all relevant times an employee of the California
3 Department of Parks and Recreation. He joined the California Department of Parks and Recreation
4 in 2014 and is now a Senior Park Aid assigned to Bolsa Chica, which is located at 17851 Pacific
5 Coast Highway, Huntington Beach, California 92648.

6 3. Plaintiff MATTHEW DAWSON is an individual and a resident of the State of California.
7 He is now and was at all relevant times an employee of the California Department of Parks and
8 Recreation. He joined the California Department of Parks and Recreation in April of 2025 and is
9 now a Senior Park Aid assigned to Bolsa Chica, which is located at 17851 Pacific Coast Highway,
10 Huntington Beach, California 92648.

11 4. Defendant CALIFORNIA DEPARTMENT OF PARKS AND RECREATION (the
12 “Department”) is, and at all relevant times was, a public and governmental department organized
13 and existing under the laws of the State of California, and an “employer” within the meaning of
14 the California Fair Employment and Housing Act.

15 5. Plaintiffs are informed and believe, and based thereon allege, that defendant KEVIN
16 PEARSALL (“Pearsall”) is an individual and a resident of the State of California. At all times
17 alleged hereinafter, Pearsall was employed by the Department as a California State Parks
18 Superintendent, and served as a supervisor of the plaintiffs.

19 6. The wrongful acts and omissions alleged herein occurred in the County of Orange, State of
20 California, including at Bolsa Chica.

21 7. The true names, identities, or capacities of the defendants sued as DOES 1 through 100,
22 inclusive, are currently unknown to Plaintiffs, who have therefore sued those defendants by
23 fictitious names. Plaintiffs are informed and believe, and based thereon allege, that each of the
24 fictitiously named defendants is a person, corporation, partnership, joint venture, governmental
25 entity or other form of legal person who is responsible in some manner for the events, acts,
26 omissions, injuries, and damages alleged herein. Plaintiffs will seek leave of Court to amend this
27 Complaint to allege the true names, identities, and capacities of the fictitiously named defendants
28 when they are ascertained.

 8. Plaintiffs are informed and believe, and based upon such information and belief allege, that

1 at all relevant times, each defendant was the agent, servant, employee, partner, joint venturer,
2 representative, alter ego, and/or co-conspirator of each of the remaining defendants, and acted
3 within the course and scope of such agency, employment, relationship, or conspiracy, or with the
4 knowledge, consent, permission, authorization, and/or ratification of the remaining defendants.

5 **THE UNDERLYING FACTUAL EVENTS**

6 9. The harassment, discrimination and hostile work environment alleged hereinafter arose out
7 of the placement of concealed recording devices and/or the surreptitious recording of male
8 Department employees in the locker room/changing room area at Bolsa Chica by Pearsall, who
9 was then a Department Superintendent and a supervisor of the plaintiffs.

10 10. The locker room/changing room at Bolsa Chica was restricted to Department employees,
11 and included toilet and urinal facilities, showers, lockers, and areas for changing clothes. Plaintiffs
12 had a reasonable expectation of privacy and a reasonable expectation that they were not being
13 electronically recorded while using the locker room/changing room at Bolsa Chica.

14 11. Plaintiffs regularly used the men's employee locker room/changing room at Bolsa
15 Chica in connection with their employment. The plaintiffs were at times fully or partially
16 undressed while changing clothes in the locker room/changing room at Bolsa Chica. The plaintiffs
17 used that area for bodily functions.

18 12. Under the California Fair Employment and Housing Act (FEHA), employers have an
19 affirmative and mandatory duty to take all reasonable steps necessary to prevent and promptly
20 correct harassment and discrimination, thereby ensuring a workplace free of sexual harassment.

21 13. Defendant Pearsall, one of the Plaintiffs' supervisors, used his position of authority and his
22 access to facilities to create and maintain a sexually hostile work environment at Bolsa Chica.

23 14. Apart from his concealed recording activities, Pearsall instructed plaintiff Dawson on
24 where to shower and change clothes within the Bolsa Chica locker room/changing room, an
25 instruction which was perceived as intrusive with sexual overtones, and which is now understood
26 in the context of his surreptitious recording for sexual gratification.

27 15. In addition, plaintiffs were aware that Pearsall allowed offensive sexual banter in the
28 Bolsa Chica workplace.

16. Plaintiffs are informed and believe that Pearsall engaged in some related form of

1 surreptitious recording in Department facilities at Huntington State Beach, and that had the
2 Department acted reasonably, the recording at Bolsa Chica would have stopped or have been
3 prevented by discovery and/or an investigation of surreptitious recording at Huntington State
4 Beach,

5 17. Plaintiffs are informed and believe that the Department failed to promulgate or publish
6 rules barring electronic devices in private areas such as the Bolsa Chica men's locker
7 room/changing room.

8 18. Perhaps as far back as 2019, and on information and belief no later than approximately
9 August of 2024, defendant Pearsall placed one or more concealed camera devices in the men's
10 employee locker room/changing room areas at Bolsa Chica. Plaintiffs are informed and believe
11 and based upon such information and belief allege that Pearsall effectuated concealed recording
12 via a device that appeared to be a USB memory stick but contained a built-in hidden camera, and
13 that the device captured audio and video recordings of male employees, in states of undress and/or
14 engaged in bodily functions without the knowledge or consent of those employees.

15 19. Defendant Pearsall placed the concealed recording device(s) in the men's employee locker
16 room/changing room at Bolsa Chica because he sought to record males who were undressed for
17 purposes of his own sexual gratification. Plaintiffs are informed and believe, and based thereon
18 allege, that PEARSALL transmitted photographs of nude and partially nude male employees
19 captured by the device to at least two other individuals for the sexual gratification of those other
20 individuals.

21 20. Plaintiffs are informed and believe, and based thereon allege, that Plaintiffs were captured
22 without consent in states of undress and/or engaging in bodily functions on Pearsall's Bolsa Chica
23 recordings.

24 21. Plaintiffs were placed in reasonable fear of having been recorded in states of undress or
25 engaging in bodily functions.

26 22. Plaintiffs were not informed by Bolsa Chica or law enforcement officials that surreptitious
27 recordings had been made in the men's employee locker room/changing room at Bolsa Chica until
28 on or about June 24, 2026.

23. Upon learning of the surreptitious recordings, Plaintiffs each suffered significant physical

1 and emotional distress and continue to suffer such distress.

2 24. The outrageousness of Pearsall's conduct is emphasized by the criminal charges filed
3 against him. Plaintiffs are informed and believe that he was charged by the Orange County District
4 Attorney's Office with five felony counts of eavesdropping, 23 misdemeanor counts of secretly
5 filming another, and three misdemeanor counts of unlawful dissemination of private recordings.

6 25. As a direct and proximate result of the conduct of the defendants, Plaintiffs have suffered
7 and continue to suffer emotional distress, humiliation, shock, shame, betrayal, anxiety, ongoing
8 emotional damage illness, and other general and special damages in amounts according to proof in
9 an amount which, as to each plaintiff, exceeds the jurisdictional minimum of the Superior Court.

10 26. Plaintiffs timely exhausted their administrative remedies with the California Civil Rights
11 Department. A true and correct copy of Plaintiff MATTHEW DAWSON's right-to-sue letter is
12 attached hereto as Exhibit "A" and incorporated herein by reference. A true and correct copy of
13 Plaintiff RICHARD COREY's right-to-sue letter is attached hereto as Exhibit "B" and
14 incorporated herein by reference. A true and correct copy of Plaintiff NICHOLAS PETKAS'
15 right-to-sue letter is attached hereto as Exhibit "C" and incorporated herein by reference.

16 27. Plaintiffs have engaged counsel and are entitled to recover reasonable attorneys' fees and
17 costs according to law.

18 **FIRST CAUSE OF ACTION**

19 (Sexual Harassment in Violation of the California Fair Employment and Housing Act
20 Against All Defendants)

21 28. By this reference, Plaintiffs incorporate allegations of paragraphs 1 through 27 as though
22 fully set forth at this point.

23 29. At all relevant times, Plaintiffs were employees protected by the California Fair
24 Employment and Housing Act.

25 30. At all relevant times, defendant Department was Plaintiffs' employer within the meaning
26 of the California Fair Employment and Housing Act.

27 31. At all relevant times, defendant Pearsall acted as Plaintiffs' supervisor and as a California
28 State Parks Superintendent.

32. Defendants, through Pearsall, engaged in unwelcome sexual conduct by placing concealed

1 cameras and by secretly recording male employees while those employees were undressed or
2 partially undressed, and/or while engaged in bodily functions, in the private workplace male
3 locker room/changing room at Bolsa Chica. Pearsall's conduct was sexual in nature and directed at
4 Plaintiffs because of their sex and gender.

5 33. The above alleged conduct was severe and/or pervasive, and created a hostile and
6 offensive work environment based on gender or sex for Plaintiffs. A reasonable person in
7 Plaintiffs' position would find the surreptitious recording of employees in the locker
8 room/changing room to be hostile, abusive, offensive, and sexually humiliating.

9 34. As a direct and proximate result of Defendants' unlawful sexual harassment, Plaintiffs
10 have suffered and continue to suffer emotional distress, humiliation, shock, shame, betrayal,
11 anxiety, ongoing emotional damage illness, and other general and special damages in amounts
12 according to proof in an amount which, as to each plaintiff, exceeds the jurisdictional minimum of
13 the Superior Court.

14 35. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct
15 of Pearsall as described above was done with malice, fraud and oppression, conscious disregard
16 for the rights and feelings of the Plaintiffs and/or with the intent, design and purpose of injuring
17 them. As a result, plaintiffs are each entitled to punitive or exemplary damages from Pearsall in a
18 sum according to proof at trial.

19 36. As a further, direct and proximate result of Defendants' violation of California Government
20 Code § 12900, et. seq., as set forth above, Plaintiffs have been compelled to retain the services of
21 counsel in an effort to enforce the terms and conditions of their employment relationship and have
22 thereby incurred, and will continue to incur, legal fees and costs, the full nature and extent of
23 which are presently unknown. Plaintiffs request that attorneys' fees and costs be awarded pursuant
24 to California Government Code § 12965.

25 **SECOND CAUSE OF ACTION**

26 (Gender Discrimination in Violation of the California Fair Employment and Housing Act
27 Against All Defendants)

28 37. By this reference, Plaintiffs incorporate allegations of paragraphs 1 through 36 as though
fully set forth at this point.

1 38. Defendants discriminated against Plaintiffs because of the Plaintiffs' sex and gender by
2 subjecting them to non-consensual secret recording in a private men's employee locker
3 room/changing room based on gender.

4 39. The above alleged conduct was severe and/or pervasive, and created a hostile and
5 offensive work environment based on gender or sex for Plaintiffs. A reasonable person in
6 Plaintiffs' position would find the surreptitious recording of employees in the locker
7 room/changing room to be hostile, abusive, offensive, and sexually humiliating.

8 40. As a direct and proximate result of Defendants' unlawful sexual harassment, Plaintiffs
9 have suffered and continue to suffer emotional distress, humiliation, shock, shame, betrayal,
10 anxiety, ongoing emotional damage illness, and other general and special damages in amounts
11 according to proof in an amount which, as to each plaintiff, exceeds the jurisdictional minimum of
12 the Superior Court.

13 41. Plaintiff is informed and believes, and based thereon alleges, that the outrageous conduct
14 of Pearsall as described above was done with malice, fraud and oppression, conscious disregard
15 for the rights and feelings of the Plaintiffs and/or with the intent, design and purpose of injuring
16 them. As a result, plaintiffs are each entitled to punitive or exemplary damages from Pearsall in a
17 sum according to proof at trial.

18 42. As a further, direct and proximate result of Defendants' violation of California Government
19 Code § 12900, et. seq., as set forth above, Plaintiffs have been compelled to retain the services of
20 counsel in an effort to enforce the terms and conditions of their employment relationship and have
21 thereby incurred, and will continue to incur, legal fees and costs, the full nature and extent of
22 which are presently unknown. Plaintiffs request that attorneys' fees and costs be awarded pursuant
23 to California Government Code § 12965.

24 **THIRD CAUSE OF ACTION**

25 (Failure to Prevent Harassment and Discrimination in Violation of the California Fair
26 Employment and Housing Act Against Defendant California Department of Parks and Recreation
27 and Does 1 through 100)

28 43. By this reference, Plaintiffs incorporate allegations of paragraphs 1 through 42 as though
fully set forth at this point.

1 44. Defendant California Department Of Parks And Recreation had a duty to take all
2 reasonable steps necessary to prevent discrimination and harassment from occurring in the
3 workplace, which here consisted of Bolsa Chica.

4 45. The Department failed to take all reasonable steps necessary to prevent discrimination and
5 harassment from occurring. Its failures include but are not limited to, failing to detect Pearsall's
6 concealed recording device, failing to monitor private workplace locker room/changing room
7 areas for concealed surveillance devices, failing to promulgate and enforce rules prohibiting
8 electronic recording devices in locker room/changing room areas, failing to supervise Pearsall
9 adequately, failing to detect recording at Huntington and otherwise failing to provide a workplace
10 free from sexual harassment and gender discrimination. The Department had the means to detect
11 Pearsall's recording actions but failed to do so. Plaintiffs are informed and believe, and based
12 thereon allege, that the Department knew or should have known that Pearsall posed an
13 unreasonable risk of concealed recording. Had the Department taken reasonable steps to prevent
14 harassment and discrimination, Pearsall's recording activities would have been discovered,
15 stopped, and remedied sooner, and Plaintiffs would not have suffered the injuries and damages
16 alleged herein.

17 46. The above alleged conduct was severe and/or pervasive, and created a hostile and
18 offensive work environment based for Plaintiffs. A reasonable person in Plaintiffs' position would
19 find the surreptitious recording of employees in the locker room/changing room to be hostile,
20 abusive, offensive, and sexually humiliating.

21 47. As a direct and proximate result of Defendants' unlawful sexual harassment, Plaintiffs
22 have suffered and continue to suffer emotional distress, humiliation, shock, shame, betrayal,
23 anxiety, ongoing emotional damage illness, and other general and special damages in amounts
24 according to proof in an amount which, as to each plaintiff, exceeds the jurisdictional minimum of
25 the Superior Court.

26 48. As a further, direct and proximate result of Defendants' violation of California Government
27 Code § 12900, et. seq., as set forth above, Plaintiffs been compelled to retain the services of
28 counsel in an effort to enforce the terms and conditions of their employment relationship and have
thereby incurred, and will continue to incur, legal fees and costs, the full nature and extent of

1 which are presently unknown. Plaintiffs request that attorneys' fees and costs be awarded pursuant
2 to California Government Code § 12965.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them, as follows:

5 **On all Causes Of Action**

- 6 1. For general damages according to proof;
- 7 2. For compensatory damages according to proof;
- 8 3. For special damages according to proof;
- 9 4. For reasonable attorneys' fees and costs according to law;

10 **On the First and Second Causes of Action only**

- 11 5. For punitive and exemplary damages against defendant KEVIN PEARSALL according to
12 proof; and
- 13 6. For such other and further relief as the Court deems just and proper.

14 DATED: July 1, 2026

ALLRED, MAROKO & GOLDBERG
GLORIA ALLRED
JOHN S. WEST

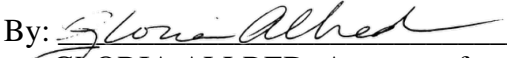
17 By: 
GLORIA ALLRED, Attorneys for
18 Plaintiffs MATTHEW DAWSON,
19 RICHARD COREY and
20 NICHOLAS PETKAS

EXHIBIT A



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 30, 2026

Matthew Dawson

c/o Allred, Maroko & Goldberg 6300 Wilshire Boulevard #1500
Los Angeles, CA 90048

RE: Notice of Case Closure and Right to Sue

CRD Matter Number: 202606-35947230

Right to Sue: Dawson / California Department of Parks and Recreation et al.

Dear Matthew Dawson:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 30, 2026 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 CRD's Small Employer Family Leave Mediation 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, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. 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 CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. 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 the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

KEVIN KISH, DIRECTOR

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

EXHIBIT B



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 30, 2026

Richard Corey
c/o Allred< Maroko & Goldberg 6300 Wilshire Boulevard #1500
Los Angeles, CA 90048

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202606-35944530
Right to Sue: Corey / California Department of Parks and Recreation et al.

Dear Richard Corey:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 30, 2026 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 CRD's Small Employer Family Leave Mediation 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, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. 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 CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. 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 the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

KEVIN KISH, DIRECTOR

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

EXHIBIT C



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

July 1, 2026

Nicholas Petkas

c/o Allred, Maroko & Goldberg, 6300 Wilshire Boulevard #1500
Los Angeles, CA 90048

RE: Notice of Case Closure and Right to Sue

CRD Matter Number: 202607-35964301

Right to Sue: Petkas / California Department of Parks and Recreation et al.

Dear Nicholas Petkas:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective July 1, 2026 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 CRD's Small Employer Family Leave Mediation 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, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. 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 CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. 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 the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department