



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

March 09, 2017

Daniel Gilleon
1320 Columbia St Ste 200
San Diego California 92101

RE: Notice to Complainant or Complainant's Attorney

DFEH Matter Number: 864587-278355

Right to Sue: Ramos Campos / Alliance Of Californians For Community Empowerment Action

Dear Complainant or Complainant's Attorney:

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 or your attorney must serve the complaint. If you do not have an attorney, you must serve the complaint yourself. 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.

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



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March 09, 2017

RE: Notice of Filing of Discrimination Complaint

DFEH Matter Number: 864587-278355

Right to Sue: Ramos Campos / Alliance Of Californians For Community Empowerment Action

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. This case is not being investigated by DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

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



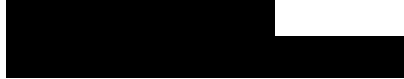
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DIRECTOR KEVIN KISH

March 09, 2017

Nohelia Ramos Campos



RE: Notice of Case Closure and Right to Sue

DFEH Matter Number: 864587-278355

Right to Sue: Ramos Campos / Alliance Of Californians For Community Empowerment Action

Dear Nohelia Ramos Campos,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 09, 2017 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

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.

To obtain a federal Right to Sue notice, you must visit 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 and Housing



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Enclosures

cc:

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 Nohelia Ramos Campos, Complainant.

DFEH No. 864587-278355

8
9 vs.

10 Alliance Of Californians For Community
11 Empowerment Action, Respondent.
12 384 H St #102
13 Chula Vista, California 91910

14 Complainant alleges:

15 1. Respondent **Alliance Of Californians For Community Empowerment Action** is
16 a **Private Employer** subject to suit under the California Fair Employment and
17 Housing Act (FEHA) (Gov. Code, § 12900 et seq.). Complainant believes
respondent is subject to the FEHA.

18 2. On or around **March 09, 2017**, complainant alleges that respondent took the
19 following adverse actions against complainant: **Discrimination, Harassment,**
20 **Retaliation Asked impermissible non-job-related questions, Denied a work**
21 **environment free of discrimination and/or retaliation, Other, Targeted with**
22 **unwarranted investigations..** Complainant believes respondent committed these
actions because of their: **Association with a member of a protected class, Color,**
Engagement in Protected Activity, Marital Status, National Origin - Including
language use restrictions, Race .

3. Complainant **Nohelia Ramos Campos** resides in the City of **San Diego**, State of
California. If complaint includes co-respondents please see below.

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Additional Complaint Details:

On or about January 5, 2017, Melody Godinez, a managing agent of SEIU Local 221, which provides funding to respondent, Alliance of Californians for Community Empowerment Action (ACCE), demanded that complainant and her husband (an employee of SEIU Local 221) express support for Mickey Kasparian (who also funded ACCE) and denounce the lawsuits filed against UFCW Local 135 and Kasparian by Sandy Naranjo and Isabel Vasquez. Complainant and her husband refused. Shortly thereafter, complainant`s husband was fired by SEIU Local 221. Also, complainant began experiencing her own harassment and unfair treatment at ACCE, such as Paola Martinez Montes, a managing agent, making demands to show support for Kasparian, explaining that Kasparian had threatened to pull funding to ACCE due to complainant`s comments on social media supporting Sandy Naranjo and Isabel Vasquez. Then, on March 6, 2017, complainant engaged in protected activity by providing a letter to respondent that opposed racism and national origin discrimination. The letter began, "As workers of color at ACCE we feel like there should be room to organizationally engage how white supremacy and other systems of oppression show up in the workplace." The letter also asserted, "As an institution, we believe that we are capable and do perpetuate white supremacy and systems of oppression in the workplace." Complainant`s letter complained of a "Culture in the organization where people of color do not feel safe speaking about their experiences and challenges as people of color." Her letter continued with further explanations, stated concerns, and proposals. Clearly, it was activity protected by FEHA. Nonetheless, respondent punished complainant for this letter and other protected activity, such as her and her husband`s refusal to support Mickey Kasparian, by launching an unwarranted, pretextual investigation that respondent informed complainant could result in her termination.

1 VERIFICATION

2 I, **Dan Gilleon**, am the Attorney for Complainant in the above-entitled complaint. I
3 have read the foregoing complaint and know the contents thereof. The same is true
4 of my own knowledge, except as to those matters which are therein alleged on
information and belief, and as to those matters, I believe it to be true.

5 On March 09, 2017, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **San Diego, CA**
8 **Dan Gilleon**

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