

**ELECTRONICALLY FILED**  
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County of Alameda  
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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **FOR THE COUNTY OF ALAMEDA**

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JEREMY KEITH, an Individual; DENNIS HURTS, an Individual; MARLIN MARTIN, an Individual; JUSTIN DANTE, an Individual; BRITTANY ALLEN, an Individual; JOSEPH JOHNSON, an Individual; JUSTIN MORROW, an Individual; MICHAEL TURNER, an Individual; MICHAEL GUESS, an Individual; JAMES COPELAND, an Individual; BRANDON VEGAS, an Individual; DAVID PIERCE ROBERTS, an Individual; CHRISTOPHER BYES, an Individual; DEVAN EDMONDS, an Individual;

Plaintiffs,

v.

TESLA, INC., doing business in California as TESLA MOTORS, INC., a Delaware Corporation; JONATHAN DOE, an Individual; CATHY DOE, an Individual; BRISTOL DOE, an Individual; RAZEL DOE, an Individual; RIPPEL PATEL, an Individual; JESUS DOE, an Individual; MUHAMMAD DOE, an Individual; AMY DOE, an Individual; LUPE GONSALVA, an Individual; an Individual; VICTOR DOE, an Individual; CHRIS DOE, an Individual; NELSON PEREZ, an Individual; THOMAS DOE, an Individual; JAMES NUEVO, an Individual; ROSS DOE, an Individual; MOHAMMAD KAHN, an Individual; SINGH DOE, an Individual; JAVIER DOE, an Individual; ALEXANDRIA DOE, an Individual; MARY DOE, an Individual; RICH DOE, an Individual; ANNA CHO, an Individual; JEREMY JONES, an Individual; JACEK DOE, an Individual; BRANDON DOE, an Individual; EMMANUEL DOE, an Individual; JAMIE DOE, an Individual;

Defendants.

CASE NO. 24CV080046

COMPLAINT FOR DAMAGES:

1. RACIAL DISCRIMINATION (Govt Code §§12940 et. seq.)
2. RACIAL DISCRIMINATION (Unruh Civil Rights Act)
3. RACIAL HARASSMENT – HOSTILE WORK ENVIRONMENT (Govt Code §§12940 et. seq.)
4. SEXUAL HARASSMENT – HOSTILE WORK ENVIRONMENT (Govt Code §§ 12923; 12940 et. seq.)
5. RETALIATION (Cal. Labor Code §1102.5)
6. RETALIATION (Unruh Civil Rights Act)
7. RETALIATION (Cal. Govt Code 12940 (h))
8. INTERFERENCE WITH CONSTITUTIONAL RIGHTS
9. FAILURE TO PREVENT DISCRIMINATION AND HARASSMENT
10. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
11. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
12. NEGLIGENT HIRING, RETENTION AND SUPERVISION
13. WRONGFUL TERMINATION
14. CONSTRUCTIVE TERMINATION

Judge:

Dept:

Complaint Filed:

Trial Date:

COME NOW, PLAINTIFFS, who complain and allege as follows:

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**I. BACKGROUND**

1. This is a case of racially motivated harassment and intimidation in which the Tesla factories have been systemically turned into, and continues to be, a racially hostile work environment. The Defendants have not only refused to take the necessary steps to prevent and eliminate such racial harassment and intimidation but rather, have affirmatively obstructed attempts to remedy the harassment which is rampant in Tesla’s factories. Each Plaintiff named herein has been harmed by Tesla’s environment of perpetual discrimination, harassment, retaliation, and hostility.

**II. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

2. PLAINTIFFS have each fully and timely exhausted his/her/their statutory administrative remedies. A true and correct copy of each PLAINTIFF’s Right-to-Sue Notice is attached to this Complaint as Exhibit “A”.

**III. PARTIES**

3. Plaintiff JEREMY KEITH (hereinafter “KEITH”) was at all relevant times a resident of the State of California, and an employee of Defendant TESLA, INC., doing business in California as TESLA MOTORS, INC. (hereinafter “TESLA”).

4. Plaintiff DENNIS HURTS (hereinafter “HURTS”) was at all relevant times a resident of the State of California, County of Contra Costa, and an employee of Defendant TESLA.

5. Plaintiff MARLIN MARTIN (hereinafter “MARTIN”) was at all relevant times a resident of the State of California, and an employee of Defendant TESLA.

6. Plaintiff JUSTIN DANTE (hereinafter “DANTE”) was at all relevant times a resident of the State of California, County of Solano, and an employee of Defendant TESLA.

7. Plaintiff BRITTANY ALLEN (hereinafter “ALLEN”) was at all relevant times a resident of the State of California, County of San Joaquin, and an employee of Defendant TESLA.

8. Plaintiff JOSEPH JOHNSON (hereinafter “JOHNSON”) was at all relevant times a resident of the State of California, and an employee of Defendant TESLA.

1           9.       Plaintiff JUSTIN MORROW (hereinafter “MORROW”) was at all relevant  
2 times a resident of the State of California, and an employee of Defendant TESLA.

3           10.       Plaintiff MICHAEL TURNER (hereinafter “TURNER”) was at all relevant  
4 times a resident of the State of California, and an employee of Defendant TESLA.

5           11.       Plaintiff MICHAEL GUESS (hereinafter “GUESS”) was at all relevant times  
6 a resident of the State of California, County of Sacramento, and an employee of Defendant  
7 TESLA.

8           12.       Plaintiff JAMES COPELAND (hereinafter “COPELAND”) was at all relevant  
9 times a resident of the State of California, and an employee of Defendant TESLA.

10          13.       Plaintiff BRANDON VEGAS (hereinafter “VEGAS”) was at all relevant times  
11 a resident of the State of California, County of Solano, and an employee of Defendant  
12 TESLA.

13          14.       Plaintiff DAVID PIERCE ROBERTS (hereinafter “ROBERTS”) was at all  
14 relevant times a resident of the State of California, and an employee of Defendant TESLA.

15          15.       Plaintiff CHRISTOPHER BYES (hereinafter “BYES”) was at all relevant  
16 times a resident of the State of California, County of Contra Costa, and an employee of  
17 Defendant TESLA.

18          16.       Plaintiff DEVAN EDMONDS (hereinafter “EDMONDS”) was at all relevant  
19 times a resident of the State of California, County of Stanislaus, and an employee of  
20 Defendant TESLA.

21          17.       Plaintiffs KEITH, HURTS, MARTIN, DANTE, ALLEN, JOHNSON,  
22 MORROW, TURNER, GUESS, COPELAND, VEGAS, ROBERTS, BYES, and EDMONDS  
23 are sometimes collectively referred to herein as “PLAINTIFFS” or “Plaintiffs”.

24          18.       Defendant TESLA, INC. doing business in California as TESLA MOTORS,  
25 INC. is now and was at all times relevant to this complaint, a Delaware corporation operating  
26 in and under the laws of the State of California and conducting business throughout  
27 California. Up until December 1, 2021, TESLA’s corporate headquarters were located at  
28 3500 Deer Creek Road, Palo Alto, California 94304. TESLA designs, manufactures, and

1 sells electric vehicles and solar panels.

2 19. As of this filing, TESLA operates out of numerous factories in California,  
 3 including multiple electric vehicle manufacturing factories located in Fremont and Lathrop,  
 4 California. The Fremont factory, located at 45500 Fremont Blvd., Fremont, California  
 5 94538, and the Lathrop factory, located at 18280 S. Haran Road, Lathrop, CA 95330, are the  
 6 sites of TESLA’s electric vehicle production. The harassing conduct at issue took place at  
 7 the Tesla factories. Due to TESLA’s ownership of the production facilities, its day-to-day  
 8 managerial role in such factory, its right to hire, fire and discipline the employees, and its  
 9 control of all terms and conditions of PLAINTIFFS’ employment, TESLA is PLAINTIFFS’  
 10 FEHA employer, or alternatively, a joint employer, which provides employment pursuant to  
 11 contract.

12 20. At all times relevant to this Complaint, TESLA was an “employer” subject to  
 13 the California Fair Employment and Housing Act (“FEHA”) and all other applicable statutes.

14 21. Upon information and belief, and Plaintiffs therefore allege, Defendant  
 15 JONATHAN DOE was at all relevant times a resident of the State of California, and a  
 16 managing agent of Defendant TESLA. Defendant JONATHAN DOE was at all relevant  
 17 times a supervisor to Plaintiff KEITH.

18 22. Upon information and belief, and Plaintiffs therefore allege, Defendant  
 19 CATHY DOE was at all relevant times a resident of the State of California, and a managing  
 20 agent of Defendant TESLA. Defendant CATHY DOE was at all relevant times a supervisor  
 21 to Plaintiff KEITH.

22 23. Upon information and belief, and Plaintiffs therefore allege, Defendant  
 23 BRISTOL DOE was at all relevant times a resident of the State of California, and a managing  
 24 agent of Defendant TESLA. Defendant BRISTOL DOE was at all relevant times a supervisor  
 25 to Plaintiff KEITH.

26 24. Upon information and belief, and Plaintiffs therefore allege, Defendant  
 27 RAZEL DOE was at all relevant times a resident of the State of California, and a managing  
 28 agent of Defendant TESLA. Defendant RAZEL DOE was at all times relevant a lead to

1 Plaintiff HURTS.

2 25. Upon information and belief, and Plaintiffs therefore allege, Defendant  
3 RIPPEL PATEL was at all relevant times a resident of the State of California, and a managing  
4 agent of Defendant TESLA. Defendant RIPPEL PATEL was at all times relevant a  
5 supervisor to Plaintiff HURTS.

6 26. Upon information and belief, and Plaintiffs therefore allege, Defendant JESUS  
7 DOE was at all relevant times a resident of the State of California, and a managing agent of  
8 Defendant TESLA. Defendant JESUS DOE was at all times relevant a supervisor to Plaintiff  
9 MARTIN.

10 27. Upon information and belief, and Plaintiffs therefore allege, Defendant  
11 MUHAMMAD DOE was at all relevant times a resident of the State of California, and a  
12 managing agent of Defendant TESLA. Defendant MUHAMMAD DOE was at all times  
13 relevant a supervisor to Plaintiff MARTIN.

14 28. Upon information and belief, and Plaintiffs therefore allege, Defendant AMY  
15 DOE was at all relevant times a resident of the State of California, and a managing agent of  
16 Defendant TESLA. Defendant AMY DOE was at all times relevant a supervisor to Plaintiff  
17 MARTIN.

18 29. Upon information and belief, and Plaintiffs therefore allege, Defendant LUPE  
19 GONSALVA was at all relevant times a resident of the State of California, and a managing  
20 agent of Defendant TESLA. Defendant LUPE GONSALVA was at all times relevant a  
21 supervisor to Plaintiff DANTE.

22 30. Upon information and belief, and Plaintiffs therefore allege, Defendant  
23 VICTOR DOE was at all relevant times a resident of the State of California, and a managing  
24 agent of Defendant TESLA. Defendant VICTOR DOE was at all relevant times a supervisor  
25 to Plaintiff ALLEN.

26 31. Upon information and belief, and Plaintiffs therefore allege, Defendant CHRIS  
27 DOE was at all relevant times a resident of the State of California, and a managing agent of  
28 Defendant TESLA. Defendant CHRIS DOE was at all relevant times a Senior HR

1 representative to Plaintiffs ALLEN and JOHNSON.

2 32. Upon information and belief, and Plaintiffs therefore allege, Defendant  
3 THOMAS DOE was at all relevant times a resident of the State of California, and a managing  
4 agent of Defendant TESLA. Defendant THOMAS DOE was at all relevant times a lead to  
5 Plaintiff JOHNSON.

6 33. Upon information and belief, and Plaintiffs therefore allege, Defendant  
7 NELSON PEREZ was at all relevant times a resident of the State of California, and a  
8 managing agent of Defendant TESLA. Defendant NELSON PEREZ was at all relevant times  
9 a supervisor to Plaintiff JOHNSON.

10 34. Upon information and belief, and Plaintiffs therefore allege, Defendant  
11 JAMES NUEVO was at all relevant times a resident of the State of California, and a  
12 managing agent of Defendant TESLA. Defendant JAMES NUEVO was at all relevant times  
13 a lead to Plaintiff MORROW.

14 35. Upon information and belief, and Plaintiffs therefore allege, Defendant ROSS  
15 DOE was at all relevant times a resident of the State of California, and a managing agent of  
16 Defendant TESLA. Defendant ROSS DOE was at all relevant times a lead to Plaintiff  
17 TURNER.

18 36. Upon information and belief, and Plaintiffs therefore allege, Defendant  
19 MOHAMMAD KAHN was at all relevant times a resident of the State of California, and a  
20 managing agent of Defendant TESLA. Defendant MOHAMMAD KAHN was at all relevant  
21 times a manager to Plaintiff TURNER.

22 37. Upon information and belief, and Plaintiffs therefore allege, Defendant  
23 SINGH DOE was at all relevant times a resident of the State of California, and a managing  
24 agent of Defendant TESLA. Defendant SINGH DOE was at all relevant times an associate  
25 manager to Plaintiff TURNER.

26 38. Upon information and belief, and Plaintiffs therefore allege, Defendant  
27 JAVIER DOE was at all relevant times a resident of the State of California, and a managing  
28 agent of Defendant TESLA. Defendant JAVIER DOE was at all relevant times a lead to

1 Plaintiff TURNER.

2 39. Upon information and belief, and Plaintiffs therefore allege, Defendants DOES  
3 51 - 60 were at all relevant times residents of the State of California, and a managing agent  
4 of Defendant TESLA. Defendants were at all relevant times managers and/or supervisors to  
5 Plaintiff GUESS.

6 40. Upon information and belief, and Plaintiffs therefore allege, Defendant  
7 ALEXANDRIA DOE was at all relevant times a resident of the State of California, and a  
8 managing agent of Defendant TESLA. Defendant ALEXANDRIA DOE was at all relevant  
9 times a lead to Plaintiff COPELAND.

10 41. Upon information and belief, and Plaintiffs therefore allege, Defendant MARY  
11 DOE was at all relevant times a resident of the State of California, and a managing agent of  
12 Defendant TESLA. Defendant MARY DOE was at all relevant times a TESLA HR  
13 representative to Plaintiff COPELAND.

14 42. Upon information and belief, and Plaintiffs therefore allege, Defendant RICH  
15 DOE was at all relevant times a resident of the State of California, and a managing agent of  
16 Defendant TESLA. Defendant RICH DOE was at all relevant times a manager to Plaintiff  
17 VEGAS.

18 43. Upon information and belief, and Plaintiffs therefore allege, Defendant ANNA  
19 CHO was at all relevant times a resident of the State of California, and a managing agent of  
20 Defendant TESLA. Defendant ANNA CHO was at all relevant times a TESLA HR  
21 Representative to Plaintiff VEGAS.

22 44. Upon information and belief, and Plaintiffs therefore allege, Defendant  
23 JEREMY JONES was at all relevant times a resident of the State of California, and a  
24 managing agent of Defendant TESLA. Defendant JEREMY JONES was at all relevant times  
25 a manager to Plaintiff VEGAS.

26 45. Upon information and belief, and Plaintiffs therefore allege, Defendant  
27 JACEK DOE was at all relevant times a resident of the State of California, and a managing  
28 agent of Defendant TESLA. Defendant JACEK DOE was at all relevant times a supervisor



1 to Plaintiff VEGAS.

2 46. Upon information and belief, and Plaintiffs therefore allege, Defendant  
3 BRANDON DOE was at all relevant times a resident of the State of California, and a  
4 managing agent of Defendant TESLA. Defendant BRANDON DOE was at all relevant times  
5 a supervisor to Plaintiff ROBERTS.

6 47. Upon information and belief, and Plaintiffs therefore allege, Defendant  
7 EMMANUEL DOE was at all relevant times a resident of the State of California, and a  
8 managing agent of Defendant TESLA. Defendant EMMANUEL DOE was at all relevant  
9 times a supervisor to Plaintiff BYES.

10 48. Upon information and belief, and Plaintiffs therefore allege, Defendant JAMIE  
11 DOE was at all relevant times a resident of the State of California, and a managing agent of  
12 Defendant TESLA. Defendant JAMIE DOE was at all relevant times a lead to Plaintiff  
13 EDMONDS.

14 49. DEFENDANTS DOES 1 through 100, inclusive, are sued herein pursuant to  
15 Code of Civil Procedure §474. PLAINTIFFS are ignorant of the true names or capacities of  
16 the DEFENDANTS sued herein under the fictitious names DOES 1 through 100, inclusive.  
17 PLAINTIFFS will amend this Complaint to allege their true names and capacities when the  
18 same are ascertained. PLAINTIFFS are informed, believe, and allege that each of the  
19 fictitiously named Defendants are legally responsible for the occurrences, injuries, and  
20 damages herein.

21 50. TESLA, its managing agents identified in the aforementioned paragraphs<sup>1</sup> of  
22 this Complaint, and DOES 1 through 100, inclusive, are collectively sometimes referred to  
23 herein as “DEFENDANTS”.

24 51. PLAINTIFFS are informed, believe, and allege that at all relevant times, each  
25 Defendant is, and was, the director, agent, employee, and/or representative of every other

26 \_\_\_\_\_

27 <sup>1</sup> The full names of these Defendants are currently unknown to Plaintiffs. Plaintiffs will amend this  
28 Complaint to reflect the full name of each named Defendant once the full name is discovered and  
known.

1 Defendant and acted within the course and scope of their agency, service, employment,  
2 and/or representation, and that each Defendant herein is jointly and severally responsible and  
3 liable to the PLAINTIFFS for damages hereinafter alleged. At all relevant times, there  
4 existed a unity of ownership and interest between or among two or more of the Defendants  
5 such that any individuality and separateness between or among those Defendants ceased, and  
6 Defendants are the alter egos of one another. Defendants exercised domination and control  
7 over one another to such an extent that any individuality or separateness of Defendants does  
8 not, and at all times herein mentioned did not, exist. All of the acts and failures to act alleged  
9 herein were duly performed by and attributed to all Defendants, each acting as the joint  
10 employer as Defendants jointly supervised and controlled workers' conditions of  
11 employment, determined assignments, rate of pay or method of payment, had authority to  
12 hire or fire workers, and maintained employment records. All actions of all Defendants were  
13 taken by workers, supervisors, executives, officers, and directors during employment with  
14 all Defendants, were taken on behalf of all Defendants, and were engaged in, authorized,  
15 ratified, and approved by all other Defendants.

#### 16 **IV. GENERAL FACTUAL ALLEGATIONS**

17 52. TESLA stands as the largest and highest-profile electric car company in the  
18 world, however, its standard operating procedures include blatant, open and unmitigated race  
19 discrimination, racial and sexual harassment, and retaliation. Racial and sexual harassment  
20 and discrimination have run rampant and continue to do so at TESLA despite  
21 DEFENDANTS' knowledge of the harassment and/or discrimination, and DEFENDANTS  
22 have done little to nothing to reasonably prevent or stop this toxic behavior and work  
23 environment.

24 53. DEFENDANTS have a practice of creating and/or failing to prevent a hostile  
25 work environment at TESLA. PLAINTIFFS, who are African-American, Hispanic, and/or  
26 Latinx employees, have been subjected to offensive racist comments and offensive racist  
27 behavior and discipline by colleagues, leads, supervisors, managers, and/or Human  
28 Resources personnel on a daily basis.

1           54. Throughout their employment with TESLA, PLAINTIFFS were targeted for  
 2 harassment on the basis of their race. The racial harassment to PLAINTIFFS who were  
 3 African-American included being called “N\*\*\*\*\*”, “N\*\*\*\*\*”, “Boy” and other racially  
 4 derogatory terms on a regular basis as well as observing other employees enduring the same  
 5 treatment.

6           55. PLAINTIFFS were confronted with racist writings while working at TESLA,  
 7 including racist graffiti, including but not limited to “N\*\*\*\*\*/N\*\*\*\*,” “n\*\*\*\*\* boy,”  
 8 “KKK,” and swastikas written on TESLA restroom walls, restroom stalls, lockers, benches,  
 9 workstations, breakrooms, and tables. These racial slurs were apparent to all who walked  
 10 by, were left up for months at a time, without TESLA bothering to remove them or address  
 11 the issue.

12           56. PLAINTIFFS were further retaliated against when voicing out and reporting  
 13 to higher authorities at TESLA regarding the racial and/or sexual harassment and  
 14 discrimination PLAINTIFFS experienced. Retaliation tactics suffered by PLAINTIFFS  
 15 included, but were not limited to, disciplinary actions, bullying, being transferred to more  
 16 labor-intensive positions, receiving unreasonable write-ups (usually unbeknownst to  
 17 PLAINTIFFS), working in an even-more hostile environment, and/or wrongful termination.

18           **PLAINTIFF JEREMY KEITH**

19           57. At all times relevant herein, Plaintiff KEITH was an employee of TESLA  
 20 beginning approximately 2020 until his ultimately termination on June 27, 2023. Plaintiff  
 21 was hired and worked as a production associate throughout his employ. Plaintiff is an  
 22 African American man.

23           58. The racial harassment towards Plaintiff KEITH began almost immediately after he  
 24 began working at TESLA and continued until the day of his leave of absence and ultimately, his  
 25 termination, where he was racially harassed by coworkers, leads, and supervisors alike.

26           59. KEITH found his employment at TESLA increasingly difficult to enjoy due to the  
 27 daily racist epithets and harassment that he had to endure through his shifts, including but not  
 28 limited to TESLA’s supervisors and managers, including Defendant JONATHAN DOE, CATHY

1 DOE, AND BRISTOL DOE, who discriminated against Plaintiff HURTS based on his race and  
2 color.

3 60. During Plaintiff KEITH'S employ with TESLA, he was addressed continuously  
4 targeted him on the basis of his race. Employees and supervisors alike make racially demeaning  
5 comments including using the word "N\*\*\*\*" to address Plaintiff, and calling him a "good boy"  
6 in a demeaning and racially motivated way. When Plaintiff reported these instances of harassment  
7 and discrimination to his supervisor, JONATHAN DOE, nothing was done, and Plaintiff was  
8 forced to continue working with his harasser.

9 61. TESLA and its supervisors and managers also presumed Plaintiff KEITH, an  
10 African-American man, as the aggressor in many situations, despite evidence showing otherwise.  
11 For example, one day, as Plaintiff KEITH was walking across the TESLA factory, a female  
12 employee suddenly and loudly threatened Plaintiff's wellbeing and job security. Instead of  
13 controlling the aggressive employee's behavior, Plaintiff KEITH was disciplined and blamed for  
14 "being the aggressor." Plaintiff KEITH pled his innocence and when TESLA finally looked for  
15 the video recordings within the TESLA factory, it revealed that Plaintiff KEITH was not acting  
16 aggressive towards the employee. Plaintiff alleges that TESLA's assumptions and resulting  
17 actions are racially motivated and discriminatory.

18 62. The disparate treatment based on race is apparent at TESLA. For example,  
19 African-American employees, including KEITH, were given harder, more labor-intensive  
20 tasks and were rotated to other labor-intensive positions more as compared to employees of  
21 who were non African-American. In fact, when African-American employees, including  
22 Plaintiff guess, requested to be rotated to other positions, they were often denied. Rather,  
23 non-African-American employees' requests were often promptly granted without any  
24 question or barriers.

25 63. Furthermore, African American employees, including KEITH, were  
26 disciplined or threatened for disciplinary actions that non-African-American employees in  
27 the same position would not be disciplined or threatened disciplinary actions for. For  
28 example, non-African-American employees were allowed to sit down and play games on

1 their cellphones. However, Plaintiff KEITH would be written up by TESLA managers and/or  
 2 supervisors for taking his legally mandated breaks or leave of absence.

3 64. TESLA managers and/or supervisors, including JONATHAN DOE, CATHY  
 4 DOE, AND BRISTOL DOE, targeted Plaintiff KEITH based on his race.

5 65. KEITH was forced to endure TESLA’s racial harassment and discrimination,  
 6 and unfair treatment, against him until he could no longer tolerate it. Plaintiff KEITH went  
 7 on personal leave until he was ultimately terminated by Tesla on or about June 27, 2023.

8 66. Plaintiff KEITH alleges that the aforementioned actions and/or omissions by  
 9 Defendants were retaliatory, racially harassing and discriminatory.

10 **PLAINTIFF DENNIS HURTS**

11 67. At all times relevant herein, Plaintiff HURTS was hired as a materials handler  
 12 beginning October 2022 until he was laid off on or about April 15, 2024. Plaintiff HURTS  
 13 is an African American man.

14 68. The racial harassment towards Plaintiff HURTS began immediately after he began  
 15 working at TESLA and continued until the day of his resignation, where he was racially harassed  
 16 by coworkers, leads, and supervisors alike.

17 69. HURTS found his employment at TESLA increasingly difficult to enjoy due to the  
 18 daily racist epithets and harassment that he had to endure through his shifts, including but not  
 19 limited to TESLA’s supervisors and managers, including RAZEL DOE, inclusive, who addressed  
 20 Plaintiff GUESS as “monkey,” and “n\*\*\*\*\*”. GUESS’s leads, supervisors, and managers  
 21 continuously targeted him on the basis of his race.

22 70. Upon reporting the racial discrimination and harassment, Plaintiff HURTS  
 23 experienced retaliation, including being transferred to a different department

24 71. The disparate treatment based on race is apparent at TESLA. For example,  
 25 African-American employees, including HURTS, were given harder, more labor-intensive  
 26 tasks and were rotated to other labor-intensive positions more as compared to employees of  
 27 who were non African-American. In fact, when African-American employees, including  
 28 Plaintiff guess, requested to be rotated to other positions, they were often denied. Rather,

1 non-African-American employees’ requests were often promptly granted without any  
 2 question or barriers.

3 72. Furthermore, African-American employees, including HURTS, were  
 4 disciplined or threatened for disciplinary actions that non-African-American employees in  
 5 the same position would not be disciplined or threatened disciplinary actions for. For  
 6 example, non-African-American employees were allowed to sit down and play games on  
 7 their cellphones. However, Plaintiff HURTS would be written up by TESLA managers  
 8 and/or supervisors simply for taking his legally mandated breaks.

9 73. When it came time for Plaintiff HURTS to be promoted, Defendants, and  
 10 each of them, concocted and devised a scheme to intentionally prevent HURTS’ ascension  
 11 up the TESLA promotional ladder for reasons not related to merit or ability to perform the  
 12 job, but for illegal, discriminatory and retaliatory reasons that included:

- 13 a. Despite Plaintiff HURTS being clearly qualified to be promoted as  
 14 Lead, TESLA repeatedly refused to promote HURTS. HURTS has  
 15 applied to approximately 4 lead positions and 6 other positions.  
 16 HURTS did not get a response to his applications. Rather, TESLA  
 17 contacted HURTS demanded that he stopped applying to the different  
 18 promoted positions.
- 19 b. Even when picked for an interview, the interview was done as a  
 20 “formality.” Plaintiff HURTS was advised during his interview that  
 21 TESLA was “not actually considering him but must meet interview quotas  
 22 for minority candidates.”

23 74. When Plaintiff HURTS reported to his managers regarding another employee’s  
 24 drug use, he was further retaliated against. TESLA retaliated by further micromanaging Plaintiff  
 25 HURTS and harassing him, placing suspicion on Plaintiff HURTS that he was using drugs.  
 26 Plaintiff HURTS alleges that Defendants’ actions are racially motivated, discriminatory and  
 27 retaliatory.

28 75. Despite reporting racial harassment and discrimination to TESLA and Defendant

1 RIPPEL PATEL, Defendants refused to act on the complaints and further subjected Plaintiff  
2 HURTS to continuous racial discrimination and harassment.

3 76. Plaintiff was forced to endure this mistreatment, harassment and discrimination  
4 until he was ultimately laid off by TESLA on April 15, 2024.

5 77. Plaintiff HURTS alleges that the aforementioned actions and/or omissions by  
6 Defendants were retaliatory, racially harassing and discriminatory.

7 **PLAINTIFF MARLIN MARTIN**

8 78. At all times relevant herein, Plaintiff MARTIN was hired as a production  
9 associate beginning approximately September 26, 2022. As of the filing of this complaint,  
10 Plaintiff MARTIN is employed with TESLA and is a production associate. Plaintiff  
11 MARTIN is an African American man.

12 79. Plaintiff MARTIN noticed the racial inequality and harassment at TESLA  
13 almost as soon as he began working. Although he was first excited to work for TESLA,  
14 Plaintiff MARTIN began to find his employment at TESLA difficult to enjoy due to the daily  
15 racist epithets and harassment that he had to endure through his shifts. Plaintiff MARTIN's  
16 leads, supervisors, and managers continuously targeted him on the basis of his race.

17 80. The disparate treatment based on race is apparent at TESLA. For example,  
18 African-American employees, including MARTIN, were given harder, more labor-intensive  
19 tasks and were rotated to other labor-intensive positions more as compared to employees of  
20 who were non African-American. In fact, when African-American employees, including  
21 Plaintiff guess, requested to be rotated to other positions, they were often denied. Rather,  
22 non-African-American employees' requests were often promptly granted without any  
23 question or barriers.

24 81. Furthermore, African-American employees, including MARTIN, were  
25 disciplined or threatened for disciplinary actions that non-African-American employees in  
26 the same position would not be disciplined or threatened disciplinary actions for. For  
27 example, non-African-American employees were allowed to sit down during their shifts and  
28 use their cellphones. However, Plaintiff MARTIN would be written up or threatened

1 disciplinary actions for doing the same.

2 82. Similarly, Plaintiff MARTIN would be blamed or punished for other  
3 employees', or even robots', mistakes or malfunctions, and provided with no opportunity to  
4 explain that he was uninvolved. Plaintiff MARTIN alleges that these actions were racially  
5 motivated and discriminatory.

6 83. On or about February 2023, while Plaintiff MARTIN was working, he  
7 experienced an episode of high blood pressure and collapsed at the workplace. TESLA  
8 managers and supervisors, including JESUS DOE, automatically assumed that Plaintiff  
9 MARTIN was drunk or used drugs. Immediately Plaintiff MARTIN was placed on  
10 administrative leave pending an investigation – a sham drug use investigation which is  
11 wholly unrelated to Plaintiff MARTIN's health condition. At the same time, Defendants  
12 confiscated Plaintiff MARTIN's keycard to enter the TESLA factory. Plaintiff MARTIN  
13 alleges that Defendants' assumptions and resulting actions were racially motivated and  
14 discriminatory.

15 84. While placed of administrative leave, Plaintiff MARTIN continued to contact  
16 TESLA HR regarding the unjustified investigation and his return date. Plaintiff MARTIN was  
17 simply given the run around. Plaintiff MARTIN was not allowed to return to work until  
18 approximately two weeks after the administrative leave.

19 85. Only a few months later, in June 2023, Plaintiff MARTIN suddenly received a call  
20 from TESLA's HR representative regarding his background check. Without additional  
21 information, TESLA placed Plaintiff MARTIN on unpaid leave of absence until further notice.  
22 Plaintiff MARTIN had been working with TESLA for nine months at this point. Plaintiff  
23 MARTIN was desperate for answers however, TESLA HR did not provide additional information  
24 relating to the investigation. One month later, TESLA HR finally contacted Plaintiff MARTIN,  
25 requesting that he return to work immediately. When Plaintiff MARTIN asked about the  
26 investigation and why he was put on unpaid leave for the one-month period, TESLA HR refused  
27 to provide additional information. Plaintiff MARTIN alleges that Defendants actions are racially  
28 motivated, discriminatory, and retaliatory.



1           86. As of the date of this complaint, Plaintiff MARTIN has not been promoted despite  
2 being clearly qualified to be a lead. Plaintiff MARTIN is repeatedly asked by managers and  
3 supervisor of TESLA to train new employees and take on additional supervisory tasks. However,  
4 other non-African-American employees are instead promoted in his place.

5           87. Throughout his employ, Plaintiff MARTIN reported the incidents of  
6 discrimination to Defendant MUHAMMAD DOE and AMY DOE, who were managers and leads  
7 of TESLA. Plaintiff MARTIN reported experiencing disparate treatment and discrimination but  
8 received no response.

9           88. Plaintiff MARTIN continues to be forced to endure the racial harassment and  
10 discrimination which is running rampant at TESLA simply because he needs the job.

11           89. Plaintiff MARTIN alleges that the aforementioned actions and/or omissions  
12 by Defendants were retaliatory, racially harassing and discriminatory.

13           **PLAINTIFF JUSTIN DANTE**

14           90. At all times relevant herein, Plaintiff DANTE was employed by TESLA at its  
15 Fremont factory as a production associate beginning December 2019 until his ultimate  
16 termination on or about March 30, 2023. Plaintiff DANTE is an African American man.

17           91. The racial harassment towards Plaintiff DANTE began shortly after he began  
18 working at TESLA and continued until the day of his termination, where he was racially harassed  
19 by coworkers, leads, and supervisors alike. Defendant GONSALVA was a supervisor at TESLA.

20           92. DANTE found his employment at TESLA increasingly difficult to enjoy due to  
21 the daily racist epithets and harassment that he had to endure through his shifts. DANTE's leads,  
22 supervisors, managers, and coworkers continuously targeted him on the basis of his race.

23           93. The disparate treatment based on race is apparent at TESLA. For example,  
24 African-American employees, including DANTE, were not provided with the same  
25 opportunities and were held to different standards. For example, TESLA requires certain  
26 certifications for certain positions. These positions requiring certification are generally more  
27 relaxed and require less physical labor than Plaintiff DANTE's position as a production  
28 associate. However, in TESLA's day-to-day, non-African-American employees, even

1 without certification, were promoted into those positions. On the other hand, Plaintiff  
2 DANTE, who was previously certified for this position, was not only not similarly promoted  
3 into the position, but was also requested to get recertified. Despite this unfair standard,  
4 Plaintiff DANTE repeatedly requested the opportunity to obtain re-certification for the  
5 position. Time after time, TESLA and/or Defendant GONSALVA ignored Plaintiff DANTE.

6 94. Further, African-American employees, including Plaintiff DANTE, were  
7 disciplined or threatened for disciplinary actions that non-African-American employees in  
8 the same position would not be disciplined or threatened disciplinary actions for. For  
9 example, Plaintiff DANTE's initial certification was voided by Defendant GONSALVA after  
10 Plaintiff DANTE was involved in a minor incident that did not cause any injuries or  
11 significant damage. Non-African-American employees on his team were not similarly  
12 punished for these, or even worse, incidents. As mentioned above, many non-African-  
13 American employees who were not certified were also allowed to continue working in  
14 positions requiring certification. However, DANTE, as an African-American employee, was

15 95. Moreover, Plaintiff DANTE received writeups and threats for disciplinary  
16 actions, including termination, for taking authorized leave of absence. Other employees are  
17 not similarly reprimanded for taking authorized leave.

18 96. Plaintiff DANTE was repeatedly harassed by his coworkers and supervisors on the  
19 basis of his race, and have witnessed other African-American employees experience the same.  
20 One day at a team meeting at TESLA, a non-African-American employee was screaming and  
21 yelling at several African-American employees, alluring to her African-American employees as  
22 "less" and "not as good." Plaintiff DANTE could not tolerate this behavior and asked Defendant  
23 GONSALVA to control that behavior. The next day, Plaintiff DANTE placed on administrative  
24 leave for "being hostile", and ultimately, Plaintiff DANTE was terminated for "workplace  
25 violence."

26 97. Plaintiff DANTE alleges that the aforementioned actions and/or omissions by  
27 Defendants were retaliatory, racially harassing and discriminatory.

28 **PLAINTIFF BRITTANY ALLEN**

1           98.     At all times relevant herein, Plaintiff ALLEN was employed by TESLA at its  
 2 Fremont factory as a production associate. Plaintiff ALLEN was employed from December  
 3 13, 2021 until August 20, 2022 and again on January 8, 2024 until her ultimate termination  
 4 on June 9, 2023. Plaintiff ALLEN is an African American woman.

5           99.     Plaintiff ALLEN was excited to be working as one of TESLA’s employees.  
 6 However, Plaintiff ALLEN found her employment intolerable when a male employee began  
 7 taking photos of her body parts, including her buttocks. Plaintiff ALLEN confronted the  
 8 male employee, who did not take her seriously.

9           100.    Plaintiff ALLEN reported the sexual harassment incident to Defendant  
 10 VICTOR DOE, the supervisor overseeing Plaintiff ALLEN and the male employee. As  
 11 Plaintiff ALLEN was reporting the incident to VICTOR DOE, the male perpetrator was  
 12 nearby and heard Plaintiff’s complaints. Defendant VICTOR DOE was similarly aware that  
 13 the male perpetrator was aware of Plaintiff’s complaints. Despite this, Defendant VICTOR  
 14 DOE simply delayed addressing the matter and told Plaintiff ALLEN that they would “have  
 15 a conversation about it later.”

16           101.    The male perpetrator overheard Plaintiff ALLEN and VICTOR DOE’s  
 17 conversation and escalated his harassment towards her. He began aggressively yelling at her  
 18 and calling her names, including racial slurs and comments, in the TESLA factory.  
 19 Defendant VICTOR DOE witnessed this but simply chose to ignore it by looking away.

20           102.    Plaintiff ALLEN began crying hysterically due to the harassment she was  
 21 forced to endure, with no help in sight.

22           103.    As Plaintiff ALLEN was crying, Defendant VICTOR DOE walked up to her and  
 23 requested that she go back to work. Defendant VICTOR DOE once again refused to address and  
 24 ratified the harassment that was occurring before his eyes.

25           104.    The racial and sexual harassment, and retaliation, did not stop there. When  
 26 Plaintiff ALLEN had her menstrual period during work, she kindly requested for accommodations  
 27 or to go home. Defendant VICTOR DOE requested Plaintiff ALLEN to “show him the blood  
 28 between her thighs” for him to let her go. Defendant VICTOR DOE further threatened her job

1 security, asking her whether she “wants a job or wants to be homeless.” Plaintiff ALLEN reported  
2 the incident to TESLA HR. Instead of addressing the harassment done to Plaintiff ALLEN,  
3 TESLA HR did nothing and allowed Plaintiff ALLEN and VICTOR DOE, as well as the male  
4 perpetrator, to continue working together.

5 105. Plaintiff continued to report to TESLA HR representatives, including CHRIS  
6 DOE, regarding the sexual and racial harassment and hostile work environment she had been  
7 experiencing and was forced to continue to experience. Once again, nothing was done.

8 106. Ultimately, on or around June 9, 2023, Plaintiff ALLEN was terminated by  
9 TESLA for her ability to provide a doctor’s note as specified by VICTOR DOE.

10 107. Plaintiff ALLEN alleges that the aforementioned actions and/or omissions by  
11 Defendants were retaliatory, racially harassing and discriminatory

12 **PLAINTIFF JOSEPH JOHNSON**

13 108. At all times relevant herein, Plaintiff JOHNSON was employed by TESLA, at  
14 its Fremont factory as a paint repair technician, beginning July 2021 until his ultimate  
15 resignation in or around January 2023. Plaintiff is an African American man.

16 109. The racial harassment towards Plaintiff JOHNSON began shortly after he began  
17 working at TESLA and continued until the day of his resignation, where he was racially harassed  
18 by coworkers, leads, and supervisors alike.

19 110. JOHNSON found his employment at TESLA increasingly difficult to enjoy due to  
20 the daily racist epithets and harassment that he had to endure through his shifts. JOHNSON’s  
21 leads, supervisors, managers, and coworkers continuously targeted him on the basis of his race.

22 111. The disparate treatment based on race is apparent at TESLA. For example,  
23 African-American employees, including JOHNSON, were not provided with the same  
24 training as employees who were non-African American. In fact, non-African American  
25 employees who began working on the same day as JOHNSON, and in the same position, have  
26 received significantly more training from TESLA’s leads, supervisors, and managers.

27 112. Defendant THOMAS DOE repeatedly harassed Plaintiff about his “lack of  
28 ability” to complete his tasks, despite knowing that Plaintiff JOHNSON did not have

1 sufficient training to carry out his assigned tasks.

2 113. Plaintiff JOHNSON could no longer stand the harassment and disparate  
 3 treatment. Accordingly, Plaintiff JOHNSON escalated his complaints of the hostile  
 4 environment and harassment to Defendant THOMAS DOE’s supervisor, Defendant  
 5 NELSON PEREZ. Plaintiff JOHNSON repeatedly made complaints about the ongoing racial  
 6 discrimination occurring within TESLA. Five months after Plaintiff JOHNSON’s initial  
 7 reporting to Defendant NELSON PEREZ, Defendant NELSON PEREZ replied by simply  
 8 brushing off Plaintiff JOHNSON’s reports.

9 114. When reports to Defendant NELSON PEREZ seemed futile, Plaintiff escalated  
 10 his reporting to TESLA HR, including to Defendant CHRIS DOE. However, nothing was  
 11 done by TESLA HR to address Plaintiff’s complaints.

12 115. Instead, after Plaintiff JOHNSON’s reporting of racial discrimination,  
 13 harassment, and hostile environment, he began experience significant retaliation, including  
 14 but not limited to:

- 15 a. Being denied overtime shifts;
- 16 b. Being written up or disciplined for absences which occurred one year  
 17 prior;
- 18 c. Being written up or disciplined for absences despite taking medical  
 19 leave;
- 20 d. Being micromanaged;
- 21 e. Receiving unjustified or a low review score without basis.

22 116. Plaintiff JOHNSON requested to transfer to other departments. However, due  
 23 to the unjustified retaliation and write ups, he was restricted from any transfers per TESLA  
 24 policies.

25 117. JOHNSON was forced to endure TESLA’s racial harassment and  
 26 discrimination, and unfair treatment, against him until he could no longer tolerate it. On or  
 27 about January 2023, he resigned.

28 118. Plaintiff JOHNSON alleges that the aforementioned actions and/or omissions

1 by Defendants were retaliatory, racially harassing and discriminatory.

2 **PLAINTIFF JUSTIN MORROW**

3 119. At all times relevant, Plaintiff MORROW was employed by TESLA, at its Fremont  
4 factory as a Battery Function Tester, beginning November 04, 2021 until his ultimate termination  
5 on or about November 2022. Plaintiff MORROW is an African American man.

6 120. The racial harassment towards Plaintiff MORROW began shortly after he began  
7 working at TESLA and continued until the day of his termination, where he was racially harassed  
8 by coworkers, leads, and supervisors alike.

9 121. The disparate treatment based on race is apparent at TESLA. For example,  
10 African-American employees, including MORROW, were disciplined or threatened for  
11 disciplinary actions that non-African-American employees in the same position would not be  
12 disciplined or threatened disciplinary actions for. For example, non-African-American  
13 employees were allowed to sit down and take a quick break during their shifts. However,  
14 Plaintiff MORROW was not allowed to take the same or similar break. In fact, Plaintiff  
15 MORROW and other African American employees were requested to end their legally  
16 mandated breaks early to return to their positions.

17 122. MORROW found his employment at TESLA increasingly difficult to enjoy due to  
18 the daily racist epithets and harassment that he had to endure through his shifts. TURNER's leads,  
19 supervisors, managers, and coworkers continuously targeted him on the basis of his race.

20 123. One day, Nicole, who worked in the same department, aggressively and loudly  
21 called Plaintiff MORROW a "N\*\*\*\*\*". Many employees of TESLA, including managers and  
22 managers alike. Immediately after Nicole's blatant racial harassment and discrimination,  
23 Plaintiff TURNER reported the incident to Defendant JAMES NUEVO, the department lead.  
24 Defendant JAMES NUEVO simply told him to "write a statement." Plaintiff TURNER complied.

25 124. Defendant JAMES NUEVO did not act on Plaintiff MORROW's reporting.  
26 Plaintiff TURNER was required to continue working side-by-side with Nicole despite her  
27 harassment to him.

28 125. When reporting to Defendant JAMES NUEVO seemed futile, Plaintiff TURNER

1 escalated his complaints to TESLA HR. Plaintiff MORROW gave statements to numerous HR  
2 representatives. However, nothing was done.

3 126. Plaintiff MORROW was forced to endure TESLA's racial harassment and  
4 discrimination, and unfair treatment, against him until he could no longer tolerate it. On or  
5 about September 2022, he took a personal leave of absence from TESLA's hostile  
6 environment.

7 127. Shortly after Plaintiff MORROW took his personal leave of absence, TESLA  
8 placed him on administrative leave. Ultimately, in or around November 2022, TESLA  
9 terminated Plaintiff MORROW on the basis that he "intimidated" Nicole and that Plaintiff  
10 TURNER was the aggressor.

11 128. Plaintiff MORROW alleges that the aforementioned actions and/or omissions  
12 by Defendants were retaliatory, racially harassing and discriminatory.

13 **PLAINTIFF MICHAEL TURNER**

14 129. At all times relevant, Plaintiff TURNER was employed by TESLA, at its Fremont  
15 factory as a production associate, beginning November 21, 2021 until his ultimate termination in  
16 or around June 2022. Plaintiff TURNER is an African American man.

17 130. The racial harassment towards Plaintiff TURNER began immediately after he  
18 began working at TESLA and continued until the day of his termination, where he was racially  
19 harassed by coworkers, leads, and supervisors alike.

20 131. The disparate treatment based on race is apparent at TESLA. For example,  
21 African-American employees, including TURNER, were disciplined or threatened for  
22 disciplinary actions that non-African-American employees in the same position would not be  
23 disciplined or threatened disciplinary actions for. For example, non-African-American  
24 employees were allowed to sit down and take a quick break during their shifts. However,  
25 Plaintiff TURNER was not allowed to take the same or similar break. In fact, Plaintiff  
26 TURNER and other African American employees were requested to end their legally  
27 mandated breaks early to return to their positions.

28 132. TURNER found his employment at TESLA increasingly difficult to enjoy due to

1 the daily racist epithets and harassment that he had to endure through his shifts. TURNER’s leads,  
 2 supervisors, and managers continuously targeted him on the basis of his race. In fact, ROSS DOE,  
 3 the lead of Plaintiff TURNER’s department, addressed Plaintiff TURNER by “N\*\*\*\*\*”, loudly  
 4 in front of the other employees. Defendant ROSS DOE’s actions were followed by others. The  
 5 hostile environment and harassment caused significant distress to Plaintiff TURNER.

6 133. Plaintiff TURNER reported the incidents of racial harassment and discrimination  
 7 to Defendant ROSS DOE’s supervisors and managers, including Defendant MOHAMMED  
 8 KAHN, SINGH DOE, and JAVIER DOE, who wholly ignored Plaintiff TURNER’s complaints.  
 9 Time passed and nothing was done.

10 134. Plaintiff TURNER escalated his complaints of hostile environment, racial  
 11 harassment and discrimination to TESLA’s HR personnel. Plaintiff TURNER complained about  
 12 ROSS DOE’s racially motivated and discriminatory treatment to TESLA HR personnel.

13 135. However, within one week of Plaintiff TURNER’s reporting, Plaintiff was  
 14 suddenly terminated without reason or justification.

15 136. Plaintiff TURNER alleges that the aforementioned actions and/or omissions  
 16 by Defendants were retaliatory, racially harassing and discriminatory.

17 **PLAINTIFF MICHAEL GUESS**

18 137. At all times relevant, Plaintiff GUESS was employed by TESLA, at its Fremont  
 19 factory as a production associate, beginning January 10, 2021 until his resignation in February  
 20 2021. Plaintiff GUESS is an African American man.

21 138. Upon joining TESLA, Plaintiff GUESS immediately noticed the racially biased  
 22 and hostile environment at TESLA.

23 139. The racial harassment towards Plaintiff GUESS began immediately after he began  
 24 working at TESLA and continued until the day of his resignation, where he was racially harassed  
 25 by coworkers, leads, and supervisors alike.

26 140. GUESS found his employment at TESLA increasingly difficult to enjoy due to the  
 27 daily racist epithets and harassment that he had to endure through his shifts, including but not  
 28 limited to TESLA’s supervisors and managers, including DOES 1 through 100, inclusive, who



1 addressed Plaintiff GUESS as “monkey,” and “n\*\*\*\*\*”. GUESS’s leads, supervisors, and  
2 managers continuously targeted him on the basis of his race.

3 141. The disparate treatment based on race is apparent at TESLA. For example,  
4 African-American employees, including GUESS, were given harder, more labor-intensive  
5 tasks and were rotated to other labor-intensive positions more as compared to employees of  
6 who were non African-American. In fact, when African-American employees, including  
7 Plaintiff guess, requested to be rotated to other positions, they were often denied. Rather,  
8 non-African-American employees’ requests were often promptly granted without any  
9 question or barriers.

10 142. Furthermore, African-American employees, including GUESS, were  
11 disciplined or threatened for disciplinary actions that non-African-American employees in  
12 the same position would not be disciplined or threatened disciplinary actions for. For  
13 example, non-African-American employees were allowed to sit down and play games on  
14 their cellphones. However, Plaintiff GUESS would be written up by TESLA managers and/or  
15 supervisors, including DOES 1 through 100, inclusive, simply for getting water or taking his  
16 legally-mandated breaks.

17 143. TESLA managers and/or supervisors, including DOES 1 through 100,  
18 inclusive, targeted Plaintiff GUESS based on his race. Plaintiff GUESS heard many racially  
19 charged comments at TESLA, including Plaintiff GUESS being told that “Black people are  
20 just supposed to work hard.”

21 144. One day, Plaintiff GUESS suffered a serious allergic reaction at work. Instead  
22 of providing immediate assistance or care, TESLA’s supervisor, including DOE 1 through  
23 100, inclusive, said, “you’re always doing this, trying to get out of work.” Plaintiff GUESS  
24 alleges that this harassment is racially motivated and discriminatory.

25 145. GUESS was forced to endure TESLA’s racial harassment and discrimination,  
26 and unfair treatment, against him until he could no longer tolerate it. On or about February  
27 2021, he resigned.

28 146. Plaintiff GUESS alleges that the aforementioned actions and/or omissions by

1 Defendants were retaliatory, racially harassing and discriminatory.

2 **PLAINTIFF JAMES COPELAND**

3 147. At all times relevant, Plaintiff COPELAND was employed by TESLA, at its  
4 Lathrop factory as a Materials Handler, beginning approximately January 2021 until his ultimate  
5 resignation in approximately August 2021. Plaintiff COPELAND is an African American man.

6 148. The racial harassment towards Plaintiff COPELAND began shortly after he began  
7 working at TESLA and continued until the day of his termination, where he was racially harassed  
8 by coworkers, leads, and supervisors alike.

9 149. COPELAND found his employment at TESLA increasingly difficult to enjoy due  
10 to the daily racist epithets and harassment that he had to endure through his shifts. COPELAND's  
11 leads, supervisors, and managers continuously targeted him on the basis of his race.

12 150. The disparate treatment based on race is apparent at TESLA. For example,  
13 Plaintiff COPELAND was not given the same training as other non-African-American  
14 employees in the same position and within the same department. Plaintiff COPELAND did  
15 not receive the same in-person training and was further disciplined for failing to perform his  
16 duties (due to the lack of training) by his supervisor, ALEX DOE, despite ALEX DOE's  
17 knowledge and decision to not provide Plaintiff COPELAND with proper training. Plaintiff  
18 COPELAND alleges that Defendant ALEX DOE's actions are racially motivated and  
19 discriminatory.

20 151. Defendant ALEX DOE continuously disciplined Plaintiff COPELAND,  
21 including negative write ups, due to the lack of training provided to Plaintiff COPELAND.  
22 Many times, Plaintiff COPELAND received write ups which were justifiable and completely  
23 unrelated to his actions. Despite Plaintiff COPELAND's repeated requests to get properly  
24 trained, TESLA and Defendant ALEX DOE refused and continued to subject Plaintiff  
25 COPELAND to unfair and disparate treatment. Plaintiff COPELAND felt that he was simply  
26 "set up for failure."

27 152. Plaintiff COPELAND escalated his complaints about the hostile work  
28 environment and racial discrimination to TESLA HR and its representatives, including

1 Defendant MARY DOE. However, nothing was done.

2 153. COPELAND was forced to endure TESLA’s racial harassment and  
 3 discrimination against him until he could no longer tolerate it. On or about August 2021, he  
 4 resigned.

5 154. Plaintiff COPELAND alleges that the aforementioned actions and/or  
 6 omissions by Defendants were retaliatory, racially harassing and discriminatory.

7 **PLAINTIFF BRANDON VEGAS**

8 155. At all times relevant, Plaintiff VEGAS was employed by TESLA, at its Fremont  
 9 factory, beginning July 6, 2021, as a carpenter for TESLA, until his termination on or about April  
 10 14, 2024. Plaintiff VEGAS is an African American man.

11 156. The racial harassment towards Plaintiff VEGAS began shortly after he began  
 12 working at TESLA and continued until the day of his termination, where he was racially harassed  
 13 by coworkers, leads, and supervisors alike.

14 157. VEGAS found his employment at TESLA increasingly difficult to enjoy due to the  
 15 daily racist epithets and harassment that he had to endure through his shifts. VEGAS’ leads,  
 16 supervisors, and managers continuously targeted him on the basis of his race.

17 158. At Plaintiff VEGAS’ review, Defendant RICH DOE, superintendent at TESLA,  
 18 gave Plaintiff VEGAS a low score without further reason or feedback. Other Non-African-  
 19 American employees who received disciplinary actions received higher scores than Plaintiff  
 20 VEGAS, who did not have any disciplinary actions or warnings against him. Plaintiff VEGAS  
 21 alleges that these actions are racially motivated and discriminatory.

22 159. Plaintiff VEGAS did not understand why he received a low review score and asked  
 23 Defendant RICH DOE whether there were any areas he needed improvement on. Defendant  
 24 RICH DOE simply told Plaintiff VEGAS that “he is fine” without any recommendations for  
 25 improvement or justification for the low review score. Plaintiff VEGAS alleges that Defendant  
 26 RICH DOE’s review of Plaintiff VEGAS was racially motivated and discriminatory.  
 27 Accordingly, Plaintiff VEGAS complained to RICH DOE regarding the disparate treatment.  
 28 However, Defendant RICH DOE simply brushed off Plaintiff VEGAS’ reporting.

1           160. Further, Defendant JACEK targeted Plaintiff based on his race and harassed  
 2 Plaintiff while Plaintiff VEGAS was working. He reported the incidents to TESLA HR, which  
 3 advised Plaintiff VEGAS that “that’s the way [Defendant JACEK] works.”

4           161. As reporting to Defendant RICH DOE became futile, Plaintiff VEGAS moved  
 5 forward to report the racially discriminatory experiences and circumstances to TESLA’s HR,  
 6 including Defendant ANNA CHO. Plaintiff VEGAS began reporting instances of racial  
 7 discrimination and disparate treatment to Defendant ANNA CHO and TESLA HR. Similar to  
 8 Defendant RICH DOE, TESLA’s HR and Defendant ANNA CHO also simply ignored the  
 9 circumstances Plaintiff VEGAS was working under.

10          162. After Plaintiff VEGAS’ reporting about the racial discrimination and harassment  
 11 he was experiencing at TESLA, he began to experience retaliation.

12          163. After Plaintiff VEGAS’ reporting, he began receiving even lower review scores  
 13 despite an increased workload and enhanced performance. However, TESLA, its supervisors and  
 14 managers, including Defendant RICH DOE, have either refused or failed to justify the  
 15 unfavorable reviews and scores, and have not advised Plaintiff VEGAS how he may improve at  
 16 work. Rather, each time Plaintiff VEGAS requests for advice Plaintiff VEGAS alleges that the  
 17 retaliation is racially motivated and discriminatory.

18          164. Further, Plaintiff VEGAS was passed over for a promotion in his department even  
 19 though he was clearly qualified for the promotion. In fact, Plaintiff VEGAS was repeatedly  
 20 requested by leads and managers and did train many other employees. Plaintiff VEGAS also  
 21 worked on tasks that were generally assigned to leads and managers. Despite Plaintiff VEGAS’  
 22 qualifications, abilities and assignments, TESLA has repeatedly failed to promote him or give  
 23 him the same benefits, bonuses, equity, and raises as other non-African-American workers who  
 24 were doing the same tasks as Plaintiff VEGAS, but rather, promoted others who were much less  
 25 qualified or experienced. The individuals promoted in place of Plaintiff VEGAS were non-  
 26 African-American individuals.

27          165. Plaintiff VEGAS alleges that the aforementioned actions and/or omissions by  
 28 Defendants were retaliatory, racially harassing and discriminatory.

1           166. Ultimately, on or about April 14, 2024, Plaintiff VEGAS received an email from  
 2 TESLA notifying him that he had been laid off.

3                   **PLAINTIFF DAVID PIERCE ROBERTS**

4           167. At all times relevant, Plaintiff ROBERTS was employed by TESLA, at its Fremont  
 5 factory, beginning approximately August 2022, as a production associate, until his resignation in  
 6 or around September 2022. Plaintiff ROBERTS is an African American man.

7           168. The racial harassment towards Plaintiff ROBERTS began almost immediately  
 8 after he began working at TESLA and continued until the day of his resignation, where he was  
 9 racially harassed by coworkers, leads, and supervisors alike.

10          169. ROBERTS found his employment at TESLA increasingly difficult to enjoy due to  
 11 the daily racist epithets and harassment that he had to endure through his shifts. ROBERTS’  
 12 leads, supervisors, and managers continuously targeted him on the basis of his race.

13          170. The majority of African-American employees working at TESLA are hired s  
 14 production associates, working labor-intensive assignments. Due to this racist hiring practice,  
 15 many African American individuals working at TESLA are *automatically assigned* to be  
 16 production associates, regardless of what position they applied for. Plaintiff ROBERTS had  
 17 interviewed and applied to be a forklift operator at TESLA, and despite his qualifications to do  
 18 so, TESLA placed Plaintiff ROBERTS on the assembly line as a production associate. Plaintiff  
 19 ROBERTS alleges that the assignment was racially motivated and discriminatory.

20          171. Plaintiff ROBERTS was assigned to the most physically demanding posts in  
 21 TESLA as compared to non-minority workers who were given more technical, less physical tasks.

22          172. The disparate treatment based on race is apparent at TESLA. African-  
 23 American employees, including ROBERTS, were given harder, more labor-intensive tasks  
 24 and remained at the labor-intensive positions more (without rotation) as compared to  
 25 employees of who were non African-American. In fact, when African-American employees,  
 26 including Plaintiff ROBERTS, requested to be rotated to other positions, they were often  
 27 denied. Rather, non-African-American employees’ requests were often promptly granted  
 28 without any question or barriers.

1 173. Throughout ROBERTS' employment with TESLA, he was targeted for  
2 harassment on the basis of his race. The harassment included the use of the terms "N\*\*\*\*"  
3 on a regular basis, and he observed other African-American employees enduring the same  
4 treatment. These racial remarks against ROBERTS were made in front of, or by, TESLA's  
5 leads, supervisors, and managers.

6 174. ROBERTS was forced to endure TESLA's racial harassment and  
7 discrimination against him until he could no longer tolerate it. On or about September 2022,  
8 he resigned.

9 175. Plaintiff ROBERTS alleges that the aforementioned actions and/or omissions  
10 by Defendants were retaliatory, racially harassing and discriminatory.

11 **PLAINTIFF CHRISTOPHER BYES**

12 176. At all times relevant Plaintiff BYES was employed by TESLA, at its Fremont,  
13 California factory, beginning approximately November 2019, as a production associate, until his  
14 ultimate resignation in approximately April 2023. Plaintiff BYES is an African American man.

15 177. The racial harassment towards Plaintiff BYES began shortly after he began  
16 working at TESLA and continued until the day of his resignation, where he was racially harassed  
17 by coworkers, leads, and supervisors alike.

18 178. Once excited about a obtaining a position at TESLA, BYES found his employment  
19 at TESLA increasingly difficult to enjoy due to the daily racist epithets and harassment that he  
20 had to endure throughout his shifts. BYES' coworkers, leads, supervisors, and managers  
21 continuously targeted him on the basis of his race.

22 179. Further, as of the filing of this Complaint, Plaintiff BYES had worked at  
23 TESLA's Fremont, California factory as a production associate for nearly 4 years without  
24 promotion and/or equal raises in pay. Plaintiff BYES alleges that the failure of promotion  
25 or equal raises in pay are racially motivated and discriminatory.

26 180. When it came time for the employees in the department to get a raise or bonus,  
27 BYES, the only African American employee at the department at the time, was not selected  
28 to receive the raises or bonuses. Employees who were non-African-American, despite having

1 negative reviews on their personnel files, would receive the raises.

2 181. Plaintiff BYES reported the discrimination and disparate treatment to Defendant  
3 EMMANUEL DOE, supervisor at TESLA. Instead of conducting any necessary investigations  
4 to ensure a safe and fair environment, Defendant EMMANUEL DOE simply brushed off BYES'  
5 concerns. When Plaintiff BYES asked whether there was anything he needed to do to improve  
6 his work so that he would receive a raise or bonus, Defendant EMMANUEL DOE simply  
7 responded, "you're fine," despite knowing that Plaintiff BYES had not been receiving the raises  
8 or bonuses.

9 182. BYES was forced to endure TESLA's racial harassment and discrimination  
10 against him until he could no longer tolerate it. On or about April 5, 2022, he resigned.

11 183. Plaintiff BYES alleges that the aforementioned actions and/or omissions by  
12 Defendants were retaliatory, racially harassing and discriminatory.

13 **PLAINTIFF DEVAN EDMONDS**

14 184. At all times relevant, Plaintiff EDMONDS was employed by TESLA, at its  
15 Fremont, California factory, beginning approximately October 2021, as a production associate,  
16 until his ultimate resignation on April 5, 2022. Plaintiff EDMONDS is a Native- and African-  
17 American man.

18 185. The racial harassment towards Plaintiff EDMONDS began shortly after he began  
19 working at Tesla and continued the day until his resignation, where he, along with other African-  
20 American employees, were racially harassed by coworkers, leads and supervisors of TESLA.

21 186. Plaintiff EDMONDS found his employment at TESLA increasingly difficult to  
22 enjoy due to the daily racist epithets and harassment that he had to endure throughout his shifts.  
23 Plaintiff EDMONDS' coworkers, leads, supervisors, and managers continuously targeted him on  
24 the basis of his race, as well as his association with his race.

25 187. Plaintiff EDMONDS, along with other African American employees of his  
26 department, were generally assigned to the "back section" of the department. All the employees  
27 assigned to the "back section" were African American. Employees of the "back section",  
28 including Plaintiff EDMONDS, were constantly mocked, harassed, and treated differently.

1 Plaintiff EDMONDS and employees of the “back section” were constantly called “lazy,” and “not  
 2 doing anything,” despite the fact that the back section has completed their tasks.

3 188. Plaintiff EDMONDS and the employees assigned to the “back section” were  
 4 unjustifiably disciplined and/or admonished for doing the same actions as other employees,  
 5 including but not limited to taking breaks and lunch breaks. When Plaintiff EDMONDS takes a  
 6 mandated rest break or lunch break at TESLA, Plaintiff EDMONDS is requested and rushed by  
 7 his leads, supervisors and/or managers, including Defendant JAMIE DOE, to return to his position  
 8 before his break ends. However, non-African-American employees are not requested the same.

9 189. Plaintiff EDMONDS can no longer endure the harassment and discrimination he  
 10 and his coworkers experienced. Plaintiff EDMONDS reported the disparate treatment and racial  
 11 harassment and discrimination to Defendant JAMIE DOE, his supervisor. As Plaintiff  
 12 EDMONDS explained the circumstances of TESLA’s hostile environment he and his coworkers  
 13 have been subjected to, Defendant JAMIE DOE simply rolled her eyes and disregarded his plead  
 14 for help. To Plaintiff EDMONDS’ best knowledge and belief, Defendant JAMIE DOE did not  
 15 investigate his reporting.

16 190. Plaintiff EDMONDS was passed up for promotions despite the fact that he was  
 17 clearly qualified for a promotion as a Lead. In fact, Defendant JAMIE DOE had advised  
 18 Plaintiff EDMONDS that he would be promoted next. When it came time for Plaintiff  
 19 EDMONDS to be promoted, Defendants, and each of them, concocted and devised a scheme  
 20 to intentionally prevent EDMONDS’ ascension up the TESLA promotional ladder for reasons  
 21 not related to merit or ability to perform the job, but for illegal, discriminatory and retaliatory  
 22 reasons that included:

- 23 a. EDMONDS is clearly qualified for a promotion as a Lead. In fact,  
 24 EDMONDS was repeatedly requested by supervisors and managers,  
 25 and had trained many other employees who have since became Leads,  
 26 Supervisors, and/or Managers at TESLA. Despite EDMONDS’ hard  
 27 work, qualifications and abilities, TESLA has repeatedly failed to  
 28 promote him but rather, promoted others who were less qualified. The



1 individuals promoted in place of EDMONDS were non-African-  
2 American individuals.

3 b. EDMONDS was further subjected to discipline that other non-African-  
4 American individuals would not be subjected to for the same actions.

5 191. EDMONDS was forced to endure TESLA’s racial harassment and  
6 discrimination against him until he could no longer tolerate it. On or about April 5, 2022, he  
7 resigned.

8 192. Plaintiff EDMONDS alleges that the aforementioned actions and/or omissions  
9 by Defendants were retaliatory, racially harassing and discriminatory.

10 **FIRST CAUSE OF ACTION**

11 **RACIAL DISCRIMINATION (Cal. Govt. Code §12940 et. seq.)**

12 **(As to all Plaintiffs; Against all Defendants)**

13 1. Plaintiffs incorporate by reference each and every allegation set forth above as  
14 though fully set forth herein.

15 2. At all times relevant to this action, Plaintiffs were employees of Defendant  
16 TESLA.

17 3. At all times relevant to this action, Defendant TESLA was an employer at  
18 defined under the California Fair Employment and Housing Act (“FEHA”).

19 4. At all times relevant to this action, Plaintiffs were covered by FEHA,  
20 Government Code §§12940(a) and (j), which prohibits an employer from discriminating  
21 against an employee on the basis of race and color.

22 5. Defendant TESLA knew or should have known of the racial discrimination  
23 that was rampant in its factories.

24 6. Defendant TESLA consistently and continuously failed to take any action to  
25 address, prevent, remedy, correct, eliminate or alleviate the racial discrimination against  
26 Plaintiffs.

27 7. Defendant TESLA’s violations of FEHA caused Plaintiffs to suffer harm.

28 8. Defendant TESLA’s consistent and continuous failure to take any action in

1 response to complaints of racial discrimination was a substantial factor in causing Plaintiffs’  
2 harms.

3 9. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs  
4 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
5 to reasonable attorney’s fees and litigation costs, including expert witness fees and costs,  
6 incurred in bringing this action.

7 10. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
8 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
9 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
10 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
11 to be determined at the time of trial and in accordance with proof.

12 **SECOND CAUSE OF ACTION**

13 **RACIAL DISCRIMINATION IN VIOLATION OF THE UNRUH CIVIL RIGHTS**

14 **ACT (Cal. Civ. Code §51)**

15 **(As to all Plaintiffs; Against all Defendants)**

16 11. Plaintiffs incorporate by reference each and every allegation set forth in above  
17 as though fully set forth herein.

18 12. At all times relevant to this action, Plaintiffs were employees of Defendant  
19 TESLA.

20 13. Each Plaintiff is a minority, specifically of African- American or Hispanic  
21 descent.

22 14. Defendant TESLA is a business establishment for the purposes of the Unruh  
23 Civil Rights Act.

24 15. Defendant TESLA intentionally acted in discriminatory manners in its  
25 business establishment against Plaintiffs. Defendant TESLA’s supervisors, managers, leads,  
26 employees and agents used racist slurs, epithets, and imagery to discriminate, harass and  
27 intimidate Plaintiffs; ignored repeated complaints and reports regarding the discrimination,  
28 harassment, and intimidation; and prevented Plaintiffs from accessing full and equal

1 accommodations, advantages, and privileges in retaliation for reporting and complaining  
 2 about the discrimination, harassment and intimidation.

3 16. Defendant TESLA’s violation of the Unruh Civil Rights Act caused Plaintiffs  
 4 to suffer harm as set forth herein.

5 17. As a result of Defendants’ unlawful acts, Plaintiffs are entitled to recover  
 6 statutory damages of a maximum of three times the amount of actual damages, or a minimum  
 7 of \$4,000.00.

8 18. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs  
 9 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
 10 to reasonable attorney’s fees and litigation costs, including expert witness fees and costs,  
 11 incurred in bringing this action.

12 19. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
 13 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
 14 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
 15 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
 16 to be determined at the time of trial and in accordance with proof.

17 **THIRD CAUSE OF ACTION**

18 **RACIAL HARRASMENT – HOSTILE WORK ENVIRONMENT (Cal. Govt. Code**  
 19 **§12940 et. seq.)**

20 **(As to all Plaintiffs; Against all Defendants)**

21 20. Plaintiffs incorporate by reference each and every allegation set forth in above  
 22 as though fully set forth herein.

23 21. At all times relevant to this action, Plaintiffs were employees of Defendant  
 24 TESLA.

25 22. At all times relevant to this action, Defendant TESLA was an employer as  
 26 defined under the California Fair Employment and Housing Act (“FEHA”).

27 23. At all times relevant to this action, Plaintiffs were covered by FEHA,  
 28 Government Code §§12940(a) and (j), which prohibits an employer from discriminating

1 against and harassing an employee on the basis of race and color.

2 24. Defendant TESLA and its managers, supervisors, leads and employees acted  
3 in manners that constitute racial harassment and discrimination in violation of FEHA.  
4 Plaintiffs were subjected to working in a racially hostile work environment which led to  
5 interferences with their work performances, were denied employment privileges, and were  
6 adversely affected relating to the terms and conditions of their jobs on the basis of race.

7 25. The harassment to which Plaintiffs were subjected was so severe, widespread  
8 and/or persistent that a reasonable African-American or Hispanic person in Plaintiffs' shoes  
9 would have considered the work environment to be hostile and/or abusive.

10 26. Plaintiffs believed and considered the work environment to be hostile and/or  
11 abusive.

12 27. Defendant TESLA knew or should have known of the racial harassment that  
13 ran rampant in its factories.

14 28. Defendant TESLA consistently and continuously failed to take any action to  
15 address, prevent, remedy, correct, eliminate or alleviate the racial harassment against  
16 Plaintiffs.

17 29. Defendant TESLA's violations of FEHA caused Plaintiffs to suffer harm.

18 30. Defendant TESLA's consistent and continuous failure to take any action in  
19 response to complaints of racial harassment was a substantial factor in causing Plaintiffs'  
20 harms.

21 31. As a result of Defendant TESLA's conduct as alleged herein, Plaintiffs  
22 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
23 to reasonable attorney's fees and litigation costs, including expert witness fees and costs,  
24 incurred in bringing this action.

25 32. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
26 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
27 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
28 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount

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to be determined at the time of trial and in accordance with proof.

**FOURTH CAUSE OF ACTION**

**SEXUAL HARASSMENT (GOVT CODE §§12940 et seq.)**

**(As to Plaintiff ALLEN Against Defendants TESLA; VICTOR DOE; CHRIS DOE and DOES 1 through 100, Inclusive)**

33. Plaintiffs incorporate by reference each and every allegation set forth in above as though fully set forth herein.

34. At all times mentioned herein, Government Code § 12940 *et seq.*, was in full force and effect and fully binding upon Defendants. Plaintiff was a member of a group protected by the statute, in particular section 12940(j), prohibiting gender harassment in employment.

35. Government Code § 12923 explains “that harassment creates a hostile, offensive, oppressive, or intimidating work environment and deprives victims of their statutory right to work in a place free of discrimination when the harassing conduct sufficiently offends, humiliates, distresses, or intrudes upon its victim, so as to disrupt the victim’s emotional tranquility in the workplace, affect the victim’s ability to perform the job as usual, or otherwise interfere with and undermine the victim’s personal sense of well-being.”

36. During Plaintiff’s employment, Defendants, through their employees, engaged in actions that constituted harassment by creating a hostile work environment for Plaintiff. All of these actions were done against Plaintiff’s will and desire and over their protests.

37. Defendant TESLA and its managers, supervisors, leads and employees acted in manners that constitute sexual harassment and discrimination in violation of FEHA. Plaintiff was subjected to working in a sexually hostile work environment which led to interferences with her work performances and were adversely affected relating to the terms and conditions of her job on the basis of sex.

38. The harassment to which Plaintiff was subjected to was so severe, widespread and/or persistent that a reasonable person in Plaintiff’s shoes would have considered the work

1 environment to be hostile and/or abusive.

2 39. Plaintiff believed and considered the work environment to be hostile and/or  
3 abusive.

4 40. Defendant TESLA knew or should have known of the sexual harassment that  
5 ran rampant in its factories.

6 41. Defendant TESLA consistently and continuously failed to take any action to  
7 address, prevent, remedy, correct, eliminate or alleviate the sexual harassment against  
8 Plaintiff.

9 42. Defendant TESLA's violations of FEHA caused Plaintiff to suffer harm.

10 43. Defendant TESLA's consistent and continuous failure to take any action in  
11 response to complaints of sexual harassment was a substantial factor in causing Plaintiff's  
12 harms.

13 44. As a result of Defendant TESLA's conduct as alleged herein, Plaintiff  
14 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
15 to reasonable attorney's fees and litigation costs, including expert witness fees and costs,  
16 incurred in bringing this action.

17 45. In perpetrating the above-described actions, the Defendants and each of them and  
18 or their agents/employees engaged in a pattern and practice of unlawful sexual harassment in  
19 violation of California Fair Employment and Housing Act of California Government Code  
20 §12940. Defendants and each of them and/or their agents/employees discriminated Plaintiff  
21 and/or failed to take immediate and appropriate corrective action. The harassment was  
22 sufficiently pervasive and severe as to alter conditions of employment and to create a hostile  
23 and/or abusive work environment.

24 46. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff  
25 suffered and will continue to suffer injuries, pain and suffering, and extreme and severe mental  
26 anguish and emotional distress. Plaintiff incurred and will continue to incur medical expenses  
27 for treatment for physicians, psychiatrists and other health professionals, and for other incidental  
28 medical expenses; and Plaintiff suffered other employment benefits. Plaintiffs thereby entitled

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to general and compensatory damages in amounts to be proven at trial.

47. The conduct of individual Defendants and each of them including DOES 1 through 100 and/or their agents/employees as described herein was malicious, fraudulent, and/or oppressive, and done with a willful and conscious disregard for Plaintiff’s rights and for the deleterious consequences of individual Defendants’ actions. Individual Defendants and each of them, and their agents/employees or supervisors, authorized, condoned and ratified the unlawful conduct of each other. Consequently, Plaintiffs are entitled to punitive damages against each of said individual Defendants.

48. Defendants’ conduct, as alleged, violated the FEHA, Cal. Govt. Code Sections 12900 et seq. and Defendants committed unlawful employment practices, including, without limitation, by the following, separate bases for liability:

- (a) Harassing Plaintiff, based, in whole or in part, based on Plaintiff’s gender in violation of Cal. Govt. Code Sections 12923 and 12940(j).
- (b) Failing to take all reasonable steps to prevent discrimination, harassment, and/or retaliation based on gender in violation of Cal. Govt. Code Section 12940(k). Defendants discriminated against Plaintiff to the extent of terminating Plaintiff.

49. As a proximate result of Defendants’ willful, knowing, and intentional harassment against Plaintiffs’ gender, Plaintiffs has sustained the loss of other employment benefits.

50. As a proximate result of Defendants’ willful, knowing, and intentional harassment against Plaintiffs, Plaintiffs suffered and continues to suffer humiliation, emotional distress, and physical and mental pain and anguish, all to their damages in a sum according to proof.

51. As a direct and proximate cause of the acts alleged above, Plaintiffs had to hire the services of an attorney. Plaintiff has incurred and continues to incur legal expenses, costs, and attorneys’ fees, and is entitled to an award of attorneys’ fees and costs. Plaintiffs are presently unaware of the precise amount of these expenses and fees and prays leave of court to amend this Complaint when the amounts are more fully known.







1 and Defendants retaliated against each of them.

2 69. Plaintiffs were engaged in protected activities when he/she/they reported  
 3 instances of racial and/or sexual harassment and discrimination to TESLA’s managing  
 4 personnel and human resources department.

5 70. Without justification or basis in fact, Defendants failed to investigate  
 6 harassment or discrimination complaints, and further disciplined, reprimanded, or  
 7 constructively terminated or terminated Plaintiffs.

8 71. In doing so, Defendant TESLA ratified the discriminatory and harassing  
 9 behavior of its managers, supervisors, leads and other employees toward Plaintiffs.

10 72. Defendants’ violations of the Unruh Civil Rights Act caused Plaintiffs to suffer  
 11 harm.

12 73. As a result of Defendants’ unlawful acts, Plaintiffs are entitled to recover  
 13 statutory damages of a maximum of three times the amount of actual damages, or a minimum  
 14 of \$4,000.00.

15 74. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs  
 16 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
 17 to reasonable attorney’s fees and litigation costs, including expert witness fees and costs,  
 18 incurred in bringing this action.

19 75. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
 20 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
 21 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
 22 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
 23 to be determined at the time of trial and in accordance with proof.

24 **SEVENTH CAUSE OF ACTION**

25 **RETALIATION (Cal. Govt. Code §12940(h))**

26 **(As to All Plaintiffs against All Defendants)**

27 76. Plaintiffs incorporate by reference each and every allegation set forth in the  
 28 above as though fully set forth herein.



**(As to all Plaintiffs; Against all Defendants)**

86. Plaintiffs incorporate by reference each and every allegation set forth in the above as though fully set forth herein.

87. Defendants interfered with Plaintiffs’ constitutional right entitling them to equal protection.

88. Defendant TESLA adopted the conduct, through its officers, directors, managing agents and/or supervisory employees. Defendant TESLA further ratified the conduct by failing to take appropriate corrective or remedial action.

89. A substantial motivating reason for Defendants’ conduct was Plaintiffs’ race.

90. Defendants interfered with Plaintiffs’ right to be free from discrimination on the basis of race as set forth herein and permitted working conditions and a workplace environment that denied Plaintiffs their constitutional right to equal protection.

91. Defendants’ conduct caused Plaintiffs to suffer, and continue to suffer, damages as set forth herein.

92. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled to reasonable attorney’s fees and litigation costs, including expert witness fees and costs, incurred in bringing this action.

93. Defendants acted maliciously, fraudulently, and oppressively, and/or with the wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice. Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount to be determined at the time of trial and in accordance with proof.

**NINTH CAUSE OF ACTION**

**FAILURE TO PREVENT DISCRIMINATION AND HARASSMENT**

**(Cal. Govt. Code §12940 et. seq.)**

**(As to all Plaintiffs; Against all Defendants)**

94. Plaintiffs incorporate by reference each and every allegation set forth the in

1 paragraphs above as though fully set forth herein.

2 95. At all times relevant to this action, Plaintiffs were employees of Defendant  
3 TESLA.

4 96. At all times relevant to this action, Defendant TESLA was an employer as  
5 defined under the California Fair Employment and Housing Act (“FEHA”).

6 97. At all times relevant to this action, Plaintiffs were covered by FEHA,  
7 Government Code §§12940 et. seq.

8 98. Defendant TESLA and its managers, supervisors, leads and employees acted  
9 in manners that constitute racial and/or sexual harassment and discrimination in violation of  
10 FEHA. Plaintiffs were subjected to working in a racially and sexually hostile work  
11 environment which led to interferences with their work performances, were denied  
12 employment privileges, and were adversely affected relating to the terms and conditions of  
13 their jobs on the basis of race.

14 99. The harassment to which Plaintiffs were subjected was so severe, widespread  
15 and/or persistent that a reasonable African-American or Hispanic person in Plaintiffs’ shoes  
16 would have considered the work environment to be hostile and/or abusive.

17 100. Plaintiffs believed and considered the work environment to be hostile and/or  
18 abusive.

19 101. Defendant TESLA knew or should have known of the racial and/or sexual  
20 harassment that ran rampant in its factories.

21 102. Defendant TESLA consistently and continuously failed to take any action to  
22 address, prevent, remedy, correct, eliminate or alleviate the racial and/or harassment against  
23 Plaintiffs.

24 103. Despite being on notice of Defendant TESLA’s employees’ propensity to  
25 engage in harassing conduct, Defendant TESLA failed to act to prevent employees from  
26 harassing and/or discriminating against Plaintiffs.

27 104. Defendant TESLA failed to enact an anti-discrimination policy and/or failed  
28 to distribute it appropriately and failed to effectively train its employees on racial and sexual

1 harassment and discrimination.

2 105. Defendant TESLA’s violations of FEHA caused Plaintiffs to suffer harm.

3 106. Defendant TESLA’s consistent and continuous failure to take any action in  
 4 response to complaints of racial and/or sexual harassment was a substantial factor in causing  
 5 Plaintiffs’ harms.

6 107. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs  
 7 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
 8 to reasonable attorney’s fees and litigation costs, including expert witness fees and costs,  
 9 incurred in bringing this action.

10 108. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
 11 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
 12 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
 13 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
 14 to be determined at the time of trial and in accordance with proof.

15 **TENTH CAUSE OF ACTION**

16 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

17 **(As to all Plaintiffs; Against all Defendants)**

18 109. Plaintiffs incorporate by reference each and every allegation set forth in the  
 19 paragraphs above as though fully set forth herein.

20 110. At all times relevant to this action, Plaintiffs were employees or contractors of  
 21 Defendant TESLA.

22 111. As employees and contractors of Defendant TESLA, Plaintiffs were owed a  
 23 duty of due care by Defendants, and each of them, to ensure that Plaintiffs were not exposed  
 24 to foreseeable harms.

25 112. Defendants, and each of them, knew or should have known, that Plaintiffs were  
 26 being subjected to racial harassment, discrimination and retaliation, and that, by failing to  
 27 exercise due care to prevent racially and/or sexually harassing, discriminatory and retaliatory  
 28 conduct, Plaintiffs could and would suffer serious emotional distress.

1 113. Defendants, and each of them, failed to exercise their duty of due care to  
2 prevent their employees, managers, leads, supervisors and/or officers from racially harassing,  
3 discriminating and retaliating against Plaintiffs.

4 114. As a direct and proximate cause of the acts and omissions of the Defendants,  
5 Plaintiffs suffered, and continue to suffer emotional distress and psychological damage. This  
6 includes, but is not limited to: humiliation, mental anguish, stress, grief, fear, depression and  
7 anxiety.

8 115. Defendants' actions have also resulted in past wage and benefit loss, and are  
9 expected to lead to additional economic loss in the future.

10 116. Defendants' acts were malicious and oppressive, and intended to vex, injure,  
11 annoy, humiliate, and embarrass Plaintiffs, and with conscious disregard of the rights and  
12 safety of Plaintiffs and other minority employees of Defendants. Plaintiffs are informed and  
13 therefore believe, and based thereon allege, that managing agents ratified the wrongful  
14 conduct of the Defendants' employees, because they were aware of this conduct and failed  
15 to take immediate remedial action, and retained the errant employees after Plaintiffs' reports  
16 of the oppressive conduct.

17 117. Plaintiffs allege that Defendants are responsible for the harms they suffered.

18 **ELEVENTH CAUSE OF ACTION**

19 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

20 **(As to all Plaintiffs; Against all Defendants)**

21 118. Plaintiffs incorporate by reference each and every allegation set forth in the  
22 paragraphs above as though fully set forth herein.

23 119. Defendant TESLA was aware of the complaints regarding constant racial  
24 abuse, sexual and/or racial discrimination and harassment in its facilities and toward  
25 Plaintiffs. Plaintiffs informed Defendants that the discrimination and harassment caused  
26 them distress, humiliation, and suffering.

27 120. Defendants knew that, by failing to take corrective and/or remedial action,  
28 Plaintiffs would continue to suffer extreme emotional distress and harm as a result of

1 Defendants' failure to act.

2 121. As a direct and consequential result of Defendants' actions and inactions,  
3 Plaintiffs have suffered severe emotional distress to their persons including, but not limited  
4 to, pain, anxiety, humiliation, anger, frustration, shame, embarrassment and fear.

5 122. Plaintiffs allege that Defendants are responsible for the harm they suffered.

6 123. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
7 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
8 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
9 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
10 to be determined at the time of trial and in accordance with proof.

11 **TWELFTH CAUSE OF ACTION**

12 **NEGLIGENT HIRING, RETENTION AND SUPERVISION**

13 **(As to all Plaintiffs; Against all Defendants)**

14 124. Plaintiffs incorporate by reference each and every allegation set forth in the  
15 paragraphs above as though fully set forth herein.

16 125. Upon information and belief, Defendants, by and through its agents and  
17 employees, knew, or reasonably should have known through reasonable investigation, of  
18 some of its agents and/or employees' propensity for unlawful racially and/or sexually  
19 harassing and discriminatory behavior.

20 126. Defendants had a duty not to hire or retain these employees/agents given their  
21 wrongful, dangerous, and racially and/or sexually offensive propensities, and to provide  
22 reasonable supervision of these employees/agents.

23 127. Defendants negligently hired, retained, and/or failed to adequately supervise  
24 these employees/agents in their positions where they were able to commit the wrongful acts  
25 against Plaintiffs as alleged herein. Defendants failed to provide reasonable supervision of  
26 these employees/agents despite knowing of their propensities and complaints made against  
27 them.

28 128. As a direct and proximate cause of the acts and omissions of the Defendants,



1 Plaintiffs suffered, and continue to suffer emotional distress and psychological damage. This  
 2 includes, but is not limited to humiliation, mental anguish, stress, grief, fear, depression and  
 3 anxiety.

4 129. Defendants’ actions have also resulted in past wage and benefit loss, and are  
 5 expected to lead to additional economic loss in the future.

6 130. Defendants’ acts were malicious and oppressive, and intended to vex, injure,  
 7 annoy, humiliate, and embarrass Plaintiffs, and with conscious disregard of the rights and  
 8 safety of Plaintiffs and other minority employees of Defendants. Plaintiffs are informed and  
 9 therefore believe, and based thereon allege, that managing agents ratified the wrongful  
 10 conduct of the Defendants’ employees, because they were aware of this conduct and failed  
 11 to take immediate remedial action, and retained the errant employees after Plaintiffs’ reports  
 12 of the oppressive conduct.

13 131. Plaintiffs allege that Defendants are responsible for the harms they suffered.

**THIRTEENTH CAUSE OF ACTION**

**WRONGFUL TERMINATION**

**(As to Plaintiffs KEITH; DANTE; ALLEN; JOHNSON; MORROW; TURNER;**  
**Against Defendant TESLA; JONATHAN DOE; CATHY DOE; BRISTOL DOE;**  
**LUPE GONSALVA; VICTOR DOE; CHRIS DOE; THOMAS DOE; NELSON**  
**PEREZ; JAMES NUEVO; ROSS DOE; MOHAMMAD KAHN; SINGH DOE;**  
**JAVIER DOE; and DOES 1-50)**

21 132. Plaintiffs incorporate by reference each and every allegation set forth in the  
 22 paragraphs above as though fully set forth herein.

23 133. At all times relevant to this action, Plaintiffs were employees or contractors of  
 24 Defendant TESLA.

25 134. Defendant TESLA punished Plaintiffs by terminating their employment.

26 135. Plaintiffs KEITH, DANTE, ALLEN, JOHNSON, MORROW, and TURNER  
 27 were engaged in protected activities when he/she/they reported the rampant racial and/or  
 28 sexual harassment and discrimination, mistreatment, retaliation, and/or hostile environment

1 at TESLA.

2 136. Without justification or basis in fact, Defendant TESLA terminated Plaintiffs  
3 KEITH, DANTE, ALLEN, JOHNSON, MORROW, AND TURNER’s employment at  
4 TESLA.

5 137. Defendants’ decision to terminate Plaintiffs’ employment based on  
6 discriminatory motives and retaliation were contrary to the policies, rules, regulations and  
7 laws of the State of California which are in substantial part designed to protect employees  
8 from discriminatory, harassing, retaliatory and otherwise harmful or unlawful conduct.  
9 These policies are included in the Constitution of the State of California and California  
10 Government Codes.

11 138. Defendants’ violations of these constitutional and statutory provisions caused  
12 Plaintiffs to suffer harm as set forth herein.

13 139. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs  
14 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
15 to reasonable attorney’s fees and litigation costs, including expert witness fees and costs,  
16 incurred in bringing this action.

17 140. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
18 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
19 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
20 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
21 to be determined at the time of trial and in accordance with proof.

22 **FOURTEENTH CAUSE OF ACTION**

23 **CONSTRUCTIVE TERMINATION**

24 **(As to Plaintiffs GUESS; COPELAND; ROBERTS; BYES; EDMONDS Against**  
25 **Defendant TESLA; ALEXANDRIA DOE; MARY DOE; BRANDON DOE;**  
26 **EMMANUEL DOE; JAMIE DOE and Does 51-100)**

27 141. Plaintiffs incorporate by reference each and every allegation set forth in the  
28 paragraphs above as though fully set forth herein.

1           142. At all times relevant to this action, Plaintiffs were employees or contractors of  
2 Defendant TESLA.

3           143. Plaintiffs GUESS, COPELAND, ROBERTS, BYES, EDMONDS were  
4 engaged in protected activities when he/she/they reported the rampant instances of racial  
5 discrimination and harassment, mistreatment, retaliation, and/or hostile environment at  
6 TESLA.

7           144. Without justification or basis in fact, Defendant TESLA refused to investigate  
8 reports and complaints of racial discrimination and harassment, mistreatment, retaliation,  
9 and/or hostile environment made by Plaintiffs, refused to address the instances of racism,  
10 discrimination and harassment, retaliation, mistreatment, and/or hostile environment and  
11 continuously made his/her/their work environment unbearable. Ultimately, Plaintiffs had no  
12 choice but to take leave and/or quit.

13           145. In doing so, Defendant TESLA ratified the discriminatory and harassing  
14 behavior of its managers, supervisors, leads and other employees toward Plaintiffs.

15           146. Defendant TESLA constructively terminated Plaintiffs employment by  
16 permitting a racist, hostile work environment to ensue and flourish at Defendant TESLA's  
17 facilities where Plaintiffs were continuously subjected to harassment and discrimination.

18           147. Plaintiffs complained of the racially-charged discrimination and harassment to  
19 Defendant TESLA. Despite these complaints, the discrimination and harassment not only  
20 continued, but escalated.

21           148. No reasonable person would have or could have borne the constant harassment,  
22 discrimination, or intimidation directed at Plaintiffs.

23           149. Despite complaints, Defendant TESLA refused to intervene to prevent the  
24 harassment and discrimination. Consequently, Plaintiffs had no choice but to take leave  
25 and/or quit.

26           150. Defendants' failure to intervene and stop or prevent the racial harassment and  
27 discrimination was contrary to the policies, rules, regulations and laws of the State of  
28 California which are in substantial part designed to protect employees from discriminatory,

1 harassing, retaliatory and otherwise harmful or unlawful conduct. These policies are  
 2 included in the Constitution of the State of California and California Government Codes.

3 151. Defendants’ violations of these constitutional and statutory provisions caused  
 4 Plaintiffs to suffer harm as set forth herein.

5 152. As a result of Defendant TESLA’s conduct as alleged herein, Plaintiffs  
 6 necessarily retained attorneys to prosecute the instant action. Plaintiffs are therefore entitled  
 7 to reasonable attorney’s fees and litigation costs, including expert witness fees and costs,  
 8 incurred in bringing this action.

9 153. Defendants acted maliciously, fraudulently, and oppressively, and/or with the  
 10 wrongful intention of injuring Plaintiffs, and/or with the conscious disregard of the rights  
 11 and safety of Plaintiffs, and/or with an improper and evil motive amounting to malice.  
 12 Plaintiffs are, therefore, entitled to recover punitive damages from Defendants in an amount  
 13 to be determined at the time of trial and in accordance with proof.

**PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiffs request judgment against Defendants as follows:

- 15 1. General damages according to proof and in an amount no less than the
- 16 jurisdictional limit of this court;
- 17
- 18 2. Special damages in amounts according to proof, together with prejudgment
- 19 interest;
- 20 3. Exemplary and punitive damages in amounts according to proof;
- 21 4. Civil penalties pursuant to *California Civil Code* §§52(a), 52(b)(2), and 52.1,
- 22 and *California Labor Code* §1102.5;
- 23 5. Attorneys’ fees and costs pursuant to *California Civil Code* §§52(a), 52(b)(3),
- 24 and 52.1(h), and California Government Code §12965(b);
- 25 6. Interest as allowed by law;
- 26 7. Costs of suit incurred herein;
- 27 8. Injunctive relief requiring Defendants to provide better training and
- 28 enforcement of prevention of racial and sexual harassment, discrimination and retaliation;

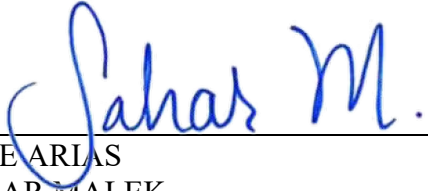
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development of effective policies and procedures to ensure that effective remedial measures are taken upon reporting of harassment; and

9. Such other and further relief that the court deems just and proper.

Dated: June 14, 2024

**ARIAS SANGUINETTI WANG & TEAM LLP**

By:   
MIKE ARIAS  
SAHAR MALEK  
BRENDA WONG  
*Attorneys for Plaintiff*

# EXHIBIT A



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 4, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202310-22221005  
Right to Sue: Hurts / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 4, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202310-22221005

Right to Sue: Hurts / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department





## Civil Rights Department

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October 4, 2023

Dennis Hurts

C/O Arias Sanguintti Wang & Torrijos, LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202310-22221005

Right to Sue: Hurts / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Dennis Hurts:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 4, 2023 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.

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



1 a member of a protected class, disability (physical, intellectual/developmental, mental  
2 health/psychiatric), race (includes hairstyle and hair texture).

3 **Complainant was discriminated against** because of complainant's ancestry, color, genetic  
4 information or characteristic, medical condition (cancer or genetic characteristic), other,  
5 association with a member of a protected class, disability (physical,  
6 intellectual/developmental, mental health/psychiatric), race (includes hairstyle and hair  
7 texture) and as a result of the discrimination was denied hire or promotion, reprimanded,  
8 denied equal pay, suspended, demoted, asked impermissible non-job-related questions,  
9 denied any employment benefit or privilege, other, denied work opportunities or  
10 assignments, denied or forced to transfer, denied accommodation for a disability, denied  
11 employer paid health care while on family care and medical leave (cfra).

12 **Complainant experienced retaliation** because complainant reported or resisted any form  
13 of discrimination or harassment, requested or used a disability-related accommodation,  
14 participated as a witness in a discrimination or harassment complaint and as a result was  
15 denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked  
16 impermissible non-job-related questions, denied any employment benefit or privilege, other,  
17 denied work opportunities or assignments, denied or forced to transfer, denied  
18 accommodation for a disability, denied employer paid health care while on family care and  
19 medical leave (cfra).

20 **Additional Complaint Details:**

1 VERIFICATION

2 I, **Brenda Wong**, 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 October 4, 2023, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **Los Angeles, CA**

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Date Filed: October 4, 2023

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## Civil Rights Department

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October 4, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

**RE: Notice to Complainant's Attorney**  
CRD Matter Number: 202310-22220405  
Right to Sue: Keith / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 4, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202310-22220405

Right to Sue: Keith / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
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October 4, 2023

Jeremy Keith

C/O Arias Sanguintti Wang & Torrijos, LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202310-22220405

Right to Sue: Keith / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Jeremy Keith:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 4, 2023 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.

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





1 4. Complainant alleges that on or about **June 27, 2023**, respondent took the  
2 following adverse actions:

3 **Complainant was harassed** because of complainant's ancestry, color, other, association  
4 with a member of a protected class, family care and medical leave (cfra) related to serious  
5 health condition of employee or family member, child bonding, or military exigencies, race  
6 (includes hairstyle and hair texture).

7 **Complainant was discriminated against** because of complainant's ancestry, color, other,  
8 association with a member of a protected class, family care and medical leave (cfra) related  
9 to serious health condition of employee or family member, child bonding, or military  
10 exigencies, race (includes hairstyle and hair texture) and as a result of the discrimination  
11 was terminated, denied hire or promotion, reprimanded, denied equal pay, suspended,  
12 demoted, asked impermissible non-job-related questions, denied any employment benefit or  
13 privilege, other, denied work opportunities or assignments, denied or forced to transfer,  
14 denied employer paid health care while on family care and medical leave (cfra), denied  
15 family care and medical leave (cfra) related to serious health condition of employee or family  
16 member, child bonding, or military exigencies.

17 **Complainant experienced retaliation** because complainant reported or resisted any form  
18 of discrimination or harassment, participated as a witness in a discrimination or harassment  
19 complaint, requested or used family care and medical leave (cfra) related to serious health  
20 condition of employee or family member, child bonding, or military exigencies and as a result  
21 was terminated, denied hire or promotion, reprimanded, denied equal pay, suspended,  
22 demoted, asked impermissible non-job-related questions, denied any employment benefit or  
23 privilege, other, denied work opportunities or assignments, denied or forced to transfer,  
24 denied employer paid health care while on family care and medical leave (cfra), denied  
25 family care and medical leave (cfra) related to serious health condition of employee or family  
26 member, child bonding, or military exigencies.

27 **Additional Complaint Details:**  
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1 VERIFICATION

2 I, **Brenda Wong**, 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 October 4, 2023, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **Los Angeles, CA**

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Date Filed: October 4, 2023

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## Civil Rights Department

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October 4, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

**RE: Notice to Complainant's Attorney**  
CRD Matter Number: 202310-22218104  
Right to Sue: Justin / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 4, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202310-22218104

Right to Sue: Justin / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 4, 2023

Dante M. Justin

C/O Arias Sanguintti Wang & Torrijos, LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202310-22218104

Right to Sue: Justin / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Dante M. Justin:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 4, 2023 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.

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



1 **Complainant was discriminated against** because of complainant's ancestry, color, genetic  
2 information or characteristic, other, association with a member of a protected class, race  
3 (includes hairstyle and hair texture) and as a result of the discrimination was terminated, laid  
4 off, denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked  
impermissible non-job-related questions, denied any employment benefit or privilege, other,  
denied work opportunities or assignments, denied or forced 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 terminated, laid off, denied hire or promotion, reprimanded,  
8 denied equal pay, suspended, demoted, asked impermissible non-job-related questions,  
denied any employment benefit or privilege, other, denied work opportunities or  
assignments, denied or forced to transfer.

9 **Additional Complaint Details:**  
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1 VERIFICATION

2 I, **Brenda Wong**, 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 October 4, 2023, 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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**Los Angeles, CA**





## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 13, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202406-25081213  
Right to Sue: Martin / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 13, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202406-25081213

Right to Sue: Martin / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 13, 2024

Marlin Martin

C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202406-25081213

Right to Sue: Martin / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Marlin Martin:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 13, 2024 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.

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

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

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

7 Marlin Martin

CRD No. 202406-25081213

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, CA 78725

14 Jesus Unknown  
15 45500 Fremont Blvd.  
16 Fremont, CA 94538

17 Muhammad Unknown  
18 45500 Fremont Blvd.  
19 Fremont, CA 94538

20 Amy Unknown  
21 45500 Fremont Blvd.  
22 Fremont, CA 94538

23 Respondents

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24 1. Respondent **TESLA, INC. doing business in California as TESLA MOTORS, INC.** is an  
25 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
26 Code, § 12900 et seq.).

27 2. Complainant is naming **Jesus Unknown** individual as Co-Respondent(s).  
28 Complainant is naming **Muhammad Unknown** individual as Co-Respondent(s).  
Complainant is naming **Amy Unknown** individual as Co-Respondent(s).

3. Complainant **Marlin Martin**, resides in the City of **Los Angeles**, State of **CA**.

1 4. Complainant alleges that on or about **June 13, 2024**, respondent took the  
2 following adverse actions:

3 **Complainant was harassed** because of complainant's ancestry, national origin (includes  
4 language restrictions), color, other, association with a member of a protected class, criminal  
5 history, race (includes hairstyle and hair texture).

6 **Complainant was discriminated against** because of complainant's ancestry, national  
7 origin (includes language restrictions), color, other, association with a member of a protected  
8 class, race (includes hairstyle and hair texture) and as a result of the discrimination was  
9 denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked  
10 impermissible non-job-related questions, denied any employment benefit or privilege, other,  
11 denied work opportunities or assignments, denied or forced to transfer.

12 **Complainant experienced retaliation** because complainant reported or resisted any form  
13 of discrimination or harassment, requested or used a disability-related accommodation,  
14 participated as a witness in a discrimination or harassment complaint and as a result was  
15 denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked  
16 impermissible non-job-related questions, other, denied work opportunities or assignments,  
17 denied or forced to transfer.

18 **Additional Complaint Details:**  
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1 VERIFICATION

2 I, **Brenda Wong**, 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 June 13, 2024, 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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**Los Angeles, CA**



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202310-22221305  
Right to Sue: Allen / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202310-22221305

Right to Sue: Allen / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department





## Civil Rights Department

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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

Brittany Allen

C/O Arias Sanguintti Wang & Torrijos, LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202310-22221305

Right to Sue: Allen / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brittany Allen:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 5, 2023 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.

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

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

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

7 Brittany Allen

CRD No. 202310-22221305

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, TX 78725

14 Victor Unknown  
15 45500 Fremont Blvd  
16 Fremont, CA 94538

17 Daniel Ushiyama  
18 45500 Fremont Blvd  
19 Fremont, CA 94538

20 Chris Unknown  
21 45500 Fremont Blvd  
22 Fremont, CA 94538

23 Respondents

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24 1. Respondent **TESLA, INC. doing business in California as TESLA MOTORS, INC.** is an  
25 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
26 Code, § 12900 et seq.).

27 2. Complainant is naming **Victor Unknown** individual as Co-Respondent(s).  
28 Complainant is naming **Daniel Ushiyama** individual as Co-Respondent(s).  
Complainant is naming **Chris Unknown** individual as Co-Respondent(s).

3. Complainant **Brittany Allen**, resides in the City of **Los Angeles**, State of **CA**.

1 **4. Complainant alleges that on or about June 9, 2023, respondent took the following**  
2 **adverse actions:**

3 **Complainant was harassed** because of complainant's ancestry, national origin (includes  
4 language restrictions), color, sex/gender, genetic information or characteristic, medical  
5 condition (cancer or genetic characteristic), other, sexual harassment- hostile environment,  
6 association with a member of a protected class, disability (physical,  
intellectual/developmental, mental health/psychiatric), family care and medical leave (cfra)  
related to serious health condition of employee or family member, child bonding, or military  
exigencies, race (includes hairstyle and hair texture).

7 **Complainant was discriminated against** because of complainant's ancestry, color,  
8 sex/gender, genetic information or characteristic, medical condition (cancer or genetic  
9 characteristic), other, sexual harassment- hostile environment, association with a member of  
10 a protected class, disability (physical, intellectual/developmental, mental health/psychiatric),  
11 family care and medical leave (cfra) related to serious health condition of employee or family  
12 member, child bonding, or military exigencies, race (includes hairstyle and hair texture) and  
13 as a result of the discrimination was terminated, denied hire or promotion, reprimanded,  
14 denied equal pay, suspended, demoted, asked impermissible non-job-related questions,  
15 denied any employment benefit or privilege, other, denied work opportunities or  
16 assignments, denied or forced to transfer, denied accommodation for a disability, denied  
17 employer paid health care while on family care and medical leave (cfra), denied family care  
18 and medical leave (cfra) related to serious health condition of employee or family member,  
19 child bonding, or military exigencies.

20 **Complainant experienced retaliation** because complainant reported or resisted any form  
21 of discrimination or harassment, requested or used a disability-related accommodation,  
22 participated as a witness in a discrimination or harassment complaint, requested or used  
23 family care and medical leave (cfra) related to serious health condition of employee or family  
24 member, child bonding, or military exigencies and as a result was terminated, denied hire or  
25 promotion, reprimanded, denied equal pay, suspended, demoted, asked impermissible non-  
26 job-related questions, denied any employment benefit or privilege, other, denied work  
27 opportunities or assignments, denied or forced to transfer, denied accommodation for a  
28 disability, denied employer paid health care while on family care and medical leave (cfra),  
denied family care and medical leave (cfra) related to serious health condition of employee  
or family member, child bonding, or military exigencies.

**Additional Complaint Details:**

1 VERIFICATION

2 I, **Brenda Wong**, 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 October 5, 2023, 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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**Los Angeles, CA**



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202310-22226405  
Right to Sue: Johnson / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202310-22226405

Right to Sue: Johnson / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

Joseph Johnson  
C/O Arias Sanguintti Wang & Torrijos, LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**  
CRD Matter Number: 202310-22226405  
Right to Sue: Johnson / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Joseph Johnson:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 5, 2023 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.

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

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

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

7 Joseph Johnson

CRD No. 202310-22226405

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, TX 78725

14 Nelson Perez  
15 45500 Fremont Blvd  
16 Fremont, CA 94538

17 Thomas Unknown  
18 45500 Fremont Blvd  
19 Fremont, CA 94538

20 Burojaiye Unknown  
21 45500 Fremont Blvd  
22 Fremont, CA 94538

23 Jean Paul Rodi  
24 45500 Fremont Blvd  
25 Fremont, CA 94538

26 Ricardo Nevarez  
27 45500 Fremont Blvd  
28 Fremont, CA 94538

Chris Unknown  
45500 Fremont Blvd  
Fremont, CA 94538

Respondents



1 **1. Respondent TESLA, INC. doing business in California as TESLA MOTORS, INC.** is an  
2 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
Code, § 12900 et seq.).

3 **2. Complainant is naming Nelson Perez** individual as Co-Respondent(s).  
Complainant is naming **Thomas Unknown** individual as Co-Respondent(s).  
4 Complainant is naming **Burojaiye Unknown** individual as Co-Respondent(s).  
5 Complainant is naming **Jean Paul Rodi** individual as Co-Respondent(s).  
6 Complainant is naming **Ricardo Nevarez** individual as Co-Respondent(s).  
Complainant is naming **Chris Unknown** individual as Co-Respondent(s).

7 **3. Complainant Joseph Johnson**, resides in the City of **Los Angeles**, State of **CA**.

8 **4. Complainant alleges that on or about October 5, 2023**, respondent took the  
9 following adverse actions:

10 **Complainant was harassed** because of complainant's ancestry, national origin (includes  
11 language restrictions), color, genetic information or characteristic, other, association with a  
member of a protected class, race (includes hairstyle and hair texture).

12 **Complainant was discriminated against** because of complainant's ancestry, national  
13 origin (includes language restrictions), color, other, association with a member of a protected  
class, race (includes hairstyle and hair texture) and as a result of the discrimination was  
14 denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked  
impermissible non-job-related questions, denied any employment benefit or privilege, other,  
15 denied work opportunities or assignments, denied or forced to transfer.

16 **Complainant experienced retaliation** because complainant reported or resisted any form  
of discrimination or harassment, participated as a witness in a discrimination or harassment  
17 complaint and as a result was denied hire or promotion, reprimanded, denied equal pay,  
suspended, demoted, asked impermissible non-job-related questions, denied any  
18 employment benefit or privilege, other, denied work opportunities or assignments, denied or  
forced to transfer.

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20 **Additional Complaint Details:**  
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1 VERIFICATION

2 I, **Brenda Wong**, 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 October 5, 2023, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **Los Angeles, CA**

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Date Filed: October 5, 2023

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## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

**RE: Notice to Complainant's Attorney**  
CRD Matter Number: 202310-22219604  
Right to Sue: Guess / TESLA, INC. doing business in California as TESLA  
MOTORS, INC.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202310-22219604

Right to Sue: Guess / TESLA, INC. doing business in California as TESLA  
MOTORS, INC.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 5, 2023

Michael Guess

C/O Arias Sanguintti Wang & Torrijos, LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202310-22219604

Right to Sue: Guess / TESLA, INC. doing business in California as TESLA  
MOTORS, INC.

Dear Michael Guess:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 5, 2023 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.

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



1 **Complainant experienced retaliation** because complainant reported or resisted any form  
2 of discrimination or harassment, participated as a witness in a discrimination or harassment  
3 complaint and as a result was forced to quit, denied hire or promotion, reprimanded, denied  
4 equal pay, suspended, demoted, asked impermissible non-job-related questions, denied any  
employment benefit or privilege, other, denied work opportunities or assignments, denied or  
forced to transfer.

5 **Additional Complaint Details:**

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1 VERIFICATION

2 I, **Brenda Wong**, 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 October 5, 2023, 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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**Los Angeles, CA**





## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 22, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

**RE: Notice to Complainant's Attorney**  
CRD Matter Number: 202403-24065622  
Right to Sue: Roberts / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 22, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202403-24065622

Right to Sue: Roberts / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 22, 2024

David Roberts

C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202403-24065622

Right to Sue: Roberts / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear David Roberts:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 22, 2024 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.

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

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

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

7 David Roberts

CRD No. 202403-24065622

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, TX 78725

14 Brandon Unknown  
15 45500 Fremont Blvd  
16 Fremont, CA 94538

17 Respondents

18 **1. Respondent TESLA, INC. doing business in California as TESLA MOTORS, INC. is an**  
19 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
20 Code, § 12900 et seq.).

21 **2. Complainant is naming Brandon Unknown individual as Co-Respondent(s).**

22 **3. Complainant David Roberts, resides in the City of Los Angeles, State of CA.**

23 **4. Complainant alleges that on or about September 30, 2022, respondent took the**  
24 **following adverse actions:**

25 **Complainant was harassed** because of complainant's ancestry, color, genetic information  
26 or characteristic, other, association with a member of a protected class, race (includes  
27 hairstyle and hair texture).

28 **Complainant was discriminated against** because of complainant's ancestry, color, other,  
association with a member of a protected class, race (includes hairstyle and hair texture)  
and as a result of the discrimination was forced to quit, denied hire or promotion, denied  
equal pay, demoted, asked impermissible non-job-related questions, denied any

-1-

*Complaint – CRD No. 202403-24065622*

Date Filed: March 22, 2024

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or  
2 forced to transfer.

3 **Additional Complaint Details:**

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1 VERIFICATION

2 I, **Brenda Wong**, 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 22, 2024, 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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**Los Angeles, CA**



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 22, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202403-24066022  
Right to Sue: Copeland / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 22, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202403-24066022

Right to Sue: Copeland / TESLA, INC. doing business in California as TESLA MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department





## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 22, 2024

James Copeland  
C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**  
CRD Matter Number: 202403-24066022  
Right to Sue: Copeland / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear James Copeland:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 22, 2024 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.

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

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

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

7 James Copeland

CRD No. 202403-24066022

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, TX 78725

14 Alexandria Unknown  
15 192 Lathrop Road  
16 Lathrop, CA 95330

17 Mary Unknown  
18 192 Lathrop Road  
19 Lathrop, CA 95330

20 Respondents

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21 1. Respondent **TESLA, INC. doing business in California as TESLA MOTORS, INC.** is an  
22 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
23 Code, § 12900 et seq.).

24 2. Complainant is naming **Alexandria Unknown** individual as Co-Respondent(s).  
25 Complainant is naming **Mary Unknown** individual as Co-Respondent(s).

26 3. Complainant **James Copeland**, resides in the City of **Los Angeles**, State of **CA**.

27 4. Complainant alleges that on or about **August 1, 2021**, respondent took the  
28 following adverse actions:

**Complainant was harassed** because of complainant's ancestry, national origin (includes language restrictions), color, other, association with a member of a protected class, race (includes hairstyle and hair texture).

1 **Complainant was discriminated against** because of complainant's ancestry, national  
2 origin (includes language restrictions), color, other, association with a member of a protected  
3 class, race (includes hairstyle and hair texture) and as a result of the discrimination was  
4 forced to quit, denied hire or promotion, reprimanded, denied equal pay, demoted, asked  
impermissible non-job-related questions, denied any employment benefit or privilege, other,  
denied work opportunities or assignments, denied or forced to transfer.

5 **Complainant experienced retaliation** because complainant reported or resisted any form  
6 of discrimination or harassment and as a result was forced to quit, denied hire or promotion,  
7 reprimanded, denied equal pay, asked impermissible non-job-related questions, other,  
denied work opportunities or assignments, denied or forced to transfer.

8 **Additional Complaint Details:**  
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1 VERIFICATION

2 I, **Brenda Wong**, 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 22, 2024, 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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**Los Angeles, CA**



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-888-519-5917 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 10, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202406-25025410  
Right to Sue: Vegas / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-888-519-5917 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 10, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202406-25025410

Right to Sue: Vegas / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-888-519-5917 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 10, 2024

Brandon Vegas  
C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**  
CRD Matter Number: 202406-25025410  
Right to Sue: Vegas / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brandon Vegas:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 10, 2024 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.

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





1 **3. Complainant Brandon Vegas, resides in the City of Los Angeles, State of CA.**

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3 **4. Complainant alleges that on or about April 14, 2024, respondent took the**  
4 **following adverse actions:**

5 **Complainant was harassed** because of complainant's ancestry, color, other, association  
6 with a member of a protected class, race (includes hairstyle and hair texture).

7 **Complainant was discriminated against** because of complainant's ancestry, color, other,  
8 association with a member of a protected class, race (includes hairstyle and hair texture)  
9 and as a result of the discrimination was terminated, laid off, denied hire or promotion,  
10 reprimanded, denied equal pay, suspended, demoted, asked impermissible non-job-related  
11 questions, denied any employment benefit or privilege, other, denied or forced to transfer.

12 **Complainant experienced retaliation** because complainant reported or resisted any form  
13 of discrimination or harassment, requested or used a disability-related accommodation,  
14 participated as a witness in a discrimination or harassment complaint, requested or used  
15 family care and medical leave (cfra) related to serious health condition of employee or family  
16 member, child bonding, or military exigencies and as a result was terminated, laid off,  
17 denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked  
18 impermissible non-job-related questions, denied any employment benefit or privilege, other,  
19 denied work opportunities or assignments, denied or forced to transfer, denied  
20 accommodation for a disability, denied employer paid health care while on family care and  
21 medical leave (cfra).

22 **Additional Complaint Details:**

1 VERIFICATION

2 I, **Brenda Wong**, 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 June 10, 2024, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **Los Angeles, CA**

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Date Filed: June 10, 2024

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## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 10, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202406-25041311  
Right to Sue: Byes / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 10, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202406-25041311

Right to Sue: Byes / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 10, 2024

Christopher Byes  
C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**  
CRD Matter Number: 202406-25041311  
Right to Sue: Byes / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Christopher Byes:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 10, 2024 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.

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



1 demoted, asked impermissible non-job-related questions, denied any employment benefit or  
2 privilege, other, denied work opportunities or assignments, denied or forced to transfer.

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

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**Additional Complaint Details:**

1 VERIFICATION

2 I, **Brenda Wong**, 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 June 10, 2024, 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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**Los Angeles, CA**





## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 15, 2023

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202306-20994615  
Right to Sue: Edmonds / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 15, 2023

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202306-20994615

Right to Sue: Edmonds / TESLA, INC. doing business in California as TESLA MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 15, 2023

Devan Edmonds

c/o Arias Sanguinetti Wang & Torrijos, LLP - 6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202306-20994615

Right to Sue: Edmonds / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Devan Edmonds:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 15, 2023 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.

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

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

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

7 Devan Edmonds

CRD No. 202306-20994615

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, TX 78725

14 Jamie Unknown  
15 45500 Fremont Blvd  
16 Fremont, CA 94538

17 Respondents

18 **1. Respondent TESLA, INC. doing business in California as TESLA MOTORS, INC. is an**  
19 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
20 Code, § 12900 et seq.).

21 **2. Complainant is naming Jamie Unknown individual as Co-Respondent(s).**

22 **3. Complainant Devan Edmonds, resides in the City of Los Angeles, State of CA.**

23 **4. Complainant alleges that on or about April 5, 2022, respondent took the following**  
24 **adverse actions:**

25 **Complainant was harassed** because of complainant's ancestry, national origin (includes  
26 language restrictions), color, genetic information or characteristic, other, association with a  
27 member of a protected class, race (includes hairstyle and hair texture).

28 **Complainant was discriminated against** because of complainant's ancestry, national  
origin (includes language restrictions), color, genetic information or characteristic, other,  
association with a member of a protected class, race (includes hairstyle and hair texture)  
and as a result of the discrimination was forced to quit, denied hire or promotion,

-1-

*Complaint – CRD No. 202306-20994615*

Date Filed: June 15, 2023

1 reprimanded, denied equal pay, suspended, demoted, asked impermissible non-job-related  
2 questions, denied any employment benefit or privilege, other, denied work opportunities or

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

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**Additional Complaint Details:**

1 VERIFICATION

2 I, **Brenda Wong**, 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 June 15, 2023, 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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**Los Angeles, CA**



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-888-519-5917 (voice) | 1-800-884-1684 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 9, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202406-25025310  
Right to Sue: Turner / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-888-519-5917 (voice) | 1-800-884-1684 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 9, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202406-25025310

Right to Sue: Turner / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department





## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-888-519-5917 (voice) | 1-800-884-1684 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 9, 2024

Michael Turner

C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202406-25025310

Right to Sue: Turner / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Michael Turner:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 9, 2024 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.

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

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

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

7 Michael Turner

CRD No. 202406-25025310

8 Complainant,

9 vs.

10 TESLA, INC. doing business in California as TESLA  
11 MOTORS, INC.  
12 1 Tesla Road  
13 Austin, TX 78725

14 Ross Unknown  
15 45500 Fremont Blvd  
16 Fremont, CA 94538

17 Mohammad Kahn  
18 45500 Fremont Blvd  
19 Fremont, CA 94538

20 Singh Unknown  
21 45500 Fremont Blvd  
22 Fremont, CA 94538

23 Javier Unknown  
24 45500 Fremont Blvd  
25 Fremont, CA 94538

26 Respondents

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27 **1. Respondent TESLA, INC. doing business in California as TESLA MOTORS, INC.** is an  
28 **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov.  
Code, § 12900 et seq.).

29 **2. Complainant is naming Ross Unknown** individual as Co-Respondent(s).  
30 Complainant is naming **Mohammad Kahn** individual as Co-Respondent(s).  
31 Complainant is naming **Singh Unknown** individual as Co-Respondent(s).  
32 Complainant is naming **Javier Unknown** individual as Co-Respondent(s).

33 -1-

34 *Complaint – CRD No. 202406-25025310*

35 Date Filed: June 9, 2024

1 **3. Complainant Michael Turner**, resides in the City of **Los Angeles**, State of **CA**.

2  
3 **4. Complainant alleges that on or about June 30, 2022**, respondent took the  
4 following adverse actions:

5 **Complainant was harassed** because of complainant's ancestry, color, other, association  
6 with a member of a protected class, race (includes hairstyle and hair texture).

7 **Complainant was discriminated against** because of complainant's ancestry, national  
8 origin (includes language restrictions), color, other, association with a member of a protected  
9 class, race (includes hairstyle and hair texture) and as a result of the discrimination was  
10 terminated, denied hire or promotion, reprimanded, denied equal pay, suspended, demoted,  
11 asked impermissible non-job-related questions, denied any employment benefit or privilege,  
12 other, denied work opportunities or assignments, denied or forced to transfer.

13 **Complainant experienced retaliation** because complainant reported or resisted any form  
14 of discrimination or harassment, participated as a witness in a discrimination or harassment  
15 complaint and as a result was terminated, denied hire or promotion, reprimanded, denied  
16 equal pay, suspended, demoted, asked impermissible non-job-related questions, denied any  
17 employment benefit or privilege, other, denied work opportunities or assignments, denied or  
18 forced to transfer.

19 **Additional Complaint Details:**  
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1 VERIFICATION

2 I, **Brenda Wong**, 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 June 9, 2024, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **Los Angeles, CA**

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Date Filed: June 9, 2024

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## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 11, 2024

Brenda Wong  
6701 Center Drive West, Suite 1400  
Los Angeles, CA 90045

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202406-25025210  
Right to Sue: Morrow / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Brenda Wong:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 11, 2024

**RE: Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202406-25025210

Right to Sue: Morrow / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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.

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

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 11, 2024

Justin Morrow

C/O Arias Sanguintti Wang & Team LLP - 6701 Center Drive West, #1400  
Los Angeles, CA 90045

**RE: Notice of Case Closure and Right to Sue**

CRD Matter Number: 202406-25025210

Right to Sue: Morrow / TESLA, INC. doing business in California as TESLA  
MOTORS, INC. et al.

Dear Justin Morrow:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 11, 2024 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.

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





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**Complainant experienced retaliation** because complainant reported or resisted any form of discrimination or harassment, participated as a witness in a discrimination or harassment complaint and as a result was terminated, forced to quit, denied hire or promotion, reprimanded, denied equal pay, suspended, demoted, asked impermissible non-job-related questions, other, denied work opportunities or assignments, denied or forced to transfer.

**Additional Complaint Details:**

1 VERIFICATION

2 I, **Brenda Wong**, 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 June 11, 2024, 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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**Los Angeles, CA**