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8 Attorney for Plaintiff
9 HIRBOD RASHIDI

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF RIVERSIDE**

12 HIRBOD RASHIDI, an Individual,
13 Plaintiff,

14 vs.

15 COUNTY OF RIVERSIDE, KIMBERLY
16 BRITT, an individual, ELIZABETH
17 LAWRENCE, an individual, and Does 1-20,
18 inclusive,
19 Defendants.

Case No.: **CVRI2401092**
Unlimited Civil

COMPLAINT FOR DAMAGES

1. **DISCRIMINATION: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**
2. **HARASSMENT: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**
3. **FAILURE TO PREVENT HARASSMENT: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**
4. **RETALIATION: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**

{DEMAND FOR JURY TRIAL}

1 Plaintiff HIRBOD RASHIDI (“PLAINTIFF”) complains and alleges against
2 Defendant(s) COUNTY OF RIVERSIDE, a duly chartered public entity (“COUNTY”),
3 KIMBERLY BRITT (“BRITT”), an individual, ELIZABETH LAWRENCE (“LAWRENCE”),
4 an individual, and DOES 1-20, inclusive, collectively (“DEFENDANTS”) and each of them, as
5 follows:

6 **PARTIES AND VENUE**

7 1. Plaintiff HIRBOD RASHIDI, is, and at all times mentioned herein was, an individual,
8 who currently resides in the State of California, County of Riverside.

9 2. PLAINTIFF is informed and believes and based thereon alleges that Defendant County
10 of Riverside is, and at all times mentioned herein was, a duly chartered public entity under the
11 laws of the State of California, and doing business in the State of California, County of
12 Riverside.

13 3. Defendant Kimberly Britt, at all times mentioned herein, was an employee of the County
14 of Riverside, Department of Child Support Services serving as the Department Director and had
15 supervisory authority over PLAINTIFF.

16 4. Defendant Elizabeth Lawrence is, and at all times mentioned herein was, an employee of
17 the County of Riverside, Department of Child Support Services serving as the Chief Deputy
18 Child Support Attorney and had supervisory authority over PLAINTIFF.

19 5. The true names and capacities whether individual, corporate, associate, or otherwise, of
20 DEFENDANTS DOES 1 through 20, are unknown to PLAINTIFF who therefore sues said
21 DEFENDANTS by such fictitious names and will ask leave of Court to amend this Complaint
22 when the true names and capacities have been ascertained. PLAINTIFF is informed and
23 believes, and thereon alleges on such information and belief, that each of the fictitiously named
24 DEFENDANTS is responsible in some manner for the occurrences alleged in this complaint.
25 PLAINTIFF is further informed and believes, and upon such information and belief alleges that
26 at the times and places mentioned herein DEFENDANTS were the agents, servants, and
27 employees of the remaining DEFENDANTS, and each of them was at all times and places
28 mentioned herein acting within the purpose and scope of said agency, service and employment.

1 4. Venue of this action is proper in Riverside County because the acts and omissions at
2 issue herein occurred in Riverside County, and DEFENDANT does business here.

3 **ALLEGATIONS**

4 5. PLAINTIFF was hired by DEFENDANT on July 13, 2000, and employed as a Deputy
5 District Attorney I.

6 6. Jennifer Rashidi (née Bryant) was hired by COUNTY on November 4, 1999, and
7 employed as Deputy District Attorney I.

8 7. In 2001 PLAINTIFF and Jennifer Rashidi transferred from the DA's office to DCSS.

9 8. In 2007, both PLAINTIFF and Jennifer Rashidi were promoted to Attorney IV positions.

10 9. Between 2001 and 2019 PLAINTIFF and Jennifer Rashidi worked together in the office,
11 had regular court assignments together, and regularly were assigned to court and office work
12 together and separately.

13 10. During the course of their employment with DEFENDANT, PLAINTIFF and Jennifer
14 Rashidi became romantically involved and got married on November 30, 2019.

15 11. At the time of their marriage PLAINTIFF did not supervise Jennifer Rashidi.

16 12. At the time of their marriage Jennifer Rashidi did not supervise PLAINTIFF.

17 13. In or around December 2019, approximately two weeks after PLAINTIFF and Jennifer
18 Rashidi were married, PLAINTIFF was informed by LAWRENCE that he would not be
19 allowed to work with Jennifer Rashidi because they were married.

20 14. PLAINTIFF objected to this decision and informed LAWRENCE that it was
21 discriminatory and in violation of California law.

22 15. LAWRENCE informed PLAINTIFF he was correct, and that PLAINTIFF and Jennifer
23 Rashidi would not be prohibited from working together since they were both line attorneys and
24 neither supervised the other.

25 16. Based on information and belief, in early 2020, LAWRENCE informed Jennifer Rashidi
26 that LAWRENCE had concerns about PLAINTIFF and Jennifer Rashidi carpooling together
27 and that the two should not carpool. Jennifer Rashidi inquired as to the nature of
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1 LAWRENCE'S concerns and LAWRENCE responded that if there was an issue with the kids,
2 then both PLAINTIFF and Jennifer Rashidi would have to leave work.

3 17. Despite PLAINTIFF being assured that they would not discriminate on the basis of
4 marital status, once DCSS resumed its normal operations after the Covid 19 pandemic,
5 PLAINTIFF and Jennifer Rashidi were no longer assigned to work together at the Hemet court
6 as they had previously for three years.

7 18. In mid 2020, BRITT contacted PLAINTIFF and informed him that the Attorney IV-S
8 position that was going to be opened for recruitment would not be based on the official job
9 description. BRITT further stated that PLAINTIFF would not like the position's duties and
10 discouraged PLAINTIFF from applying. PLAINTIFF applied for the position but did not
11 receive the promotion.

12 19. In or around late 2020, PLAINTIFF complained of the ongoing harassment,
13 discrimination, and retaliation for complaining about the marital status discrimination including
14 modifying work schedules to prevent PLAINTIFF and Jennifer Rashidi from working together.

15 20. In or around late 2020, LAWRENCE informed PLAINTIFF that when DCSS resumed
16 its normal operations, PLAINTIFF and Jennifer Rashidi would be returned to the schedule and
17 work assignments and seniority that they had earned prior to marriage.

18 21. Based on information and belief, in or around January 2021, LAWRENCE informed
19 Jennifer Rashidi that there was a concern about PLAINTIFF and Jennifer Rashidi appearing in
20 court together without a supervisor present because they were married. When asked for the
21 reason for this concern, LAWRENCE could not articulate a reason.

22 22. Beginning in January 2021, any time PLAINTIFF and Jennifer Rashidi were scheduled
23 in court together, an Attorney IV-S would be present as well even though the Attorney IV-S
24 position had no supervisory authority over Attorney IV'S and no responsibilities for court. The
25 Attorney IV-S' were not present in court when attorneys other than PLAINTIFF and Jennifer
26 Rashidi were appearing in court.

27 23. In or around April 2021, despite DCSS returning to normal, pre-pandemic operations
28 PLAINTIFF and Jennifer Rashidi were not allowed to appear in court together.

1 24. Based on information and belief, in or around April 2021, LAWRENCE informed
2 Jennifer Rashidi that having PLAINTIFF and Jennifer Rashidi work together would appear
3 poorly to customers because they were married. LAWRENCE further informed Jennifer
4 Rashidi that PLAINTIFF and Jennifer Rashidi could not work on each other's cases due to their
5 marriage despite this being a common practice for all other department attorneys.

6 25. In or around May 2021, the responsibility of handling DCSS appellate work was taken
7 away from PLAINTIFF. PLAINTIFF had handled this responsibility since 2001 and was
8 responsible for three published opinions.

9 26. In or around June 2021, Jennifer Rashidi was promoted to an Attorney IV-S position.

10 27. Based on information and belief, in or around late June 2021, Maichi Nguyen
11 ("NGUYEN"), Jennifer Rashidi's supervising attorney, informed Jennifer Rashidi that now that
12 she was a supervisor, Jennifer Rashidi could no longer appear in court together with
13 PLAINTIFF. Jennifer Rashidi informed NGUYEN that Jennifer Rashidi had no supervisory
14 duties as an Attorney IV-S. NGUYEN informed Jennifer Rashidi that in an emergency
15 situation, like a water leak, the senior attorney (Attorney IV-S) would have the responsibility to
16 report that emergency and therefore had supervisory duties that created a conflict with Jennifer
17 Rashidi appearing in court with PLAINTIFF.

18 28. Based on information and belief, in or around August 2021, Jennifer Rashidi met with
19 BRITT and informed BRITT that Jennifer Rashidi was going to step down from the Attorney
20 IV-S position based on the restrictions placed on Jennifer Rashidi and PLAINTIFF due to their
21 marital status. BRITT informed Jennifer Rashidi that BRITT was uncomfortable with Jennifer
22 Rashidi and PLAINTIFF working together even if they were at the same occupational level as
23 Attorney IV'S. BRITT then contacted LAWRENCE and informed LAWRENCE that
24 PLAINTIFF and Jennifer Rashidi were not to work the same court assignment.

25 29. In or around August 2021, PLAINTIFF again complained to LAWRENCE and HR that
26 the discrimination, harassment, and retaliation against him based on marital status continued.
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1 30. In or around August 2021, PLAINTIFF received a response to his complaint from HR
2 informing him that LAWRENCE had complete authority to schedule and assign tasks to
3 PLAINTIFF and Jennifer Rashidi in any manner LAWRENCE chose.

4 31. In or around September 2021, PLAINTIFF had an in-person meeting with LAWRENCE
5 to demand that the discrimination and harassment against PLAINTIFF and his wife stop.
6 LAWRENCE responded that she had been directed by BRITT, Department Director, to separate
7 the PLAINTIFF and Jennifer Rashidi and that LAWRENCE had no choice.

8 32. In or around February 2022, DCSS implemented a PCIA (pre court interview) process.
9 As part of this change, Riverside Attorney IV positions were assigned to prep work for lower-
10 level attorneys. PLAINTIFF and Jennifer Rashidi were the only Attorney IV'S in Riverside.
11 This duty was not required of the Attorney IV'S in Indio. This significant change to DCSS
12 operations resulted in PLAINTIFF and Jennifer Rashidi being assigned prep and support work
13 for lower-level attorneys. This type of work was previously performed by paralegals or
14 administrative staff. This change also resulted in a significant amount of higher-level duties
15 (court appearances and mentoring junior attorneys in court) was removed from both
16 PLAINTIFF and Jennifer Rashidi.

17 33. Another consequence of the PCIA process was that PLAINTIFF and Jennifer Rashidi
18 were no longer scheduled for regular court coverage. Court coverage is one of the highest-level
19 functions of DCSS attorneys and the most senior DCSS attorneys in the Riverside branch were
20 no longer allowed to regularly appear in court.

21 34. In early 2023, PLAINTIFF was no-longer allowed to file pleadings or other documents
22 with the court which had previously been part of his responsibilities.

23 35. Based on information and belief, in mid 2023, Jennifer Rashidi was assigned a writ
24 project and requested that PLAINTIFF be allowed to assist based on his appellate and writ
25 experience. PLAINTIFF was the most experienced DCSS attorney in this area at the time.
26 Despite PLAINTIFF'S qualification and the obvious benefit to the department, Jennifer
27 Rashidi's request was denied.
28

1 36. Based on information and belief, in January 2024, PLAINTIFF was issued a subpoena to
2 testify in a child support matter. The private attorney issuing the subpoena was contacted by
3 NGUYEN and NGUYEN stated that PLAINTIFF was unavailable on the date request despite
4 the private attorney already clearing the date with PLAINTIFF. NGUYEN further informed the
5 private attorney that PLAINTIFF would not be allowed to provide testimony pursuant to the
6 subpoena.

7 37. From the implementation of the PCIA process, PLAINTIFF was condemned to office
8 work under the premise that PLAINTIFF was needed for higher-level IV work in the office.
9 However, there was simply not enough high-level IV to keep PLAINTIFF busy. As a result,
10 PLAINTIFF was tasked with paralegal and/or administrative support work to keep him busy as
11 lower-level attorneys were assigned the higher-level tasks previously assigned to Attorney IV
12 positions.

13 38. PLAINTIFF repeatedly objected to the discrimination, harassment, and retaliation of
14 being assigned lower-level tasks because of his marriage.

15 39. In or around February 2024, DCSS restored the YODA (your office day assignment
16 system. The result of the current incarnation of the YODA system is that PLAINTIFF and
17 Jennifer Rashidi are officially removed from the court appearance rotation which is handled
18 completely by lower-level attorneys.

19 40. On February 29, 2024, PLAINTIFF filed a complaint with the California Civil Rights
20 Department and obtained a right to sue letter. (Exhibit-1).

21
22 **FIRST CAUSE OF ACTION**

(Against Defendant County of Riverside and DOES 1-20)

23 **DISCRIMINATION: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**

24 41. PLAINTIFF incorporates by reference each and every allegation contained in the
25 preceding paragraphs.

26 42. During the course of his employment, PLAINTIFF experienced discrimination based on
27 his marital status, including DEFENDANTS limiting PLAINTIFF'S ability to appear in court,
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1 assigning PLAINTIFF support tasks normally reserved for lower-level attorneys or non-attorney
2 support staff, denial of promotion, and removing attorney IV level assignments from
3 PLAINTIFF.

4 43. DEFENDANTS' marital status discrimination was a violation of California
5 Government Code § 12940.

6 44. As a proximate result of the conduct of DEFENDANTS, and each of them, PLAINTIFF
7 has suffered general and special damages in a sum according to proof, but which amount
8 exceeds the jurisdictional minimum of this Court, with interest at the maximum legal rate.

9
10 **SECOND CAUSE OF ACTION**

(Against all Defendants)

11 **HARASSMENT: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**

12 45. PLAINTIFF incorporates by reference each and every allegation contained in the
13 preceding paragraphs.

14 46. PLAINTIFF was an employee of COUNTY.

15 47. DEFENDANTS harassed PLAINTIFF based on his marital status by DEFENDANTS'
16 limiting PLAINTIFF'S ability to appear in court, assigning PLAINTIFF support tasks normally
17 reserved for lower-level attorneys or non-attorney support staff, denial of promotion, and
18 removing attorney IV level assignments from PLAINTIFF.

19 48. DEFENDANTS' harassing conduct was severe and pervasive.

20 49. A reasonable person in PLAINTIFF'S circumstances would have considered the work
21 environment to be hostile, intimidating, offensive, oppressive, and abusive.

22 50. PLAINTIFF considered the work environment to be hostile, intimidating, offensive,
23 oppressive, and abusive.

24 51. PLAINTIFF'S supervisors engaged in the harassing conduct.

25 52. PLAINTIFF was harmed as a result of the DEFENDANTS' conduct.

26 53. DEFENDANTS' harassment of PLAINTIFF was a substantial factor in causing
27 PLAINTIFF'S harm.

1 54. As a proximate result of the conduct of DEFENDANTS, and each of them, PLAINTIFF
2 has suffered general and special damages in a sum according to proof, but which amount
3 exceeds the jurisdictional minimum of this Court, with interest at the maximum legal rate.

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5 **THIRD CAUSE OF ACTION**

6 (Against Defendant County of Riverside and DOES 1-20)

7 **FAILURE TO PREVENT HARASSMENT/DISCRIMINATION: VIOLATION OF
8 GOVERNMENT CODE § 12940 et seq.**

9 55. PLAINTIFF incorporates by reference each and every allegation contained in the
10 preceding paragraphs.

11 56. PLAINTIFF was subjected to harassment and discrimination during the course of his
12 employment.

13 57. COUNTY failed to take all reasonable steps to prevent the harassment and/or
14 discrimination.

15 58. PLAINTIFF was harmed as a result of the COUNTY'S conduct.

16 59. DEFENDANTS' harassment and/or discrimination of PLAINTIFF was a substantial
17 factor in causing PLAINTIFF'S harm.

18 60. As a proximate result of the conduct of DEFENDANTS, and each of them, PLAINTIFF
19 has suffered general and special damages in a sum according to proof, but which amount
20 exceeds the jurisdictional minimum of this Court, with interest at the maximum legal rate.

21 **FOURTH CAUSE OF ACTION**

22 (Against Defendant County of Riverside and DOES 1-20)

23 **RETALIATION: VIOLATION OF GOVERNMENT CODE § 12940 et seq.**

24 61. PLAINTIFF incorporates by reference each and every allegation contained in the
25 preceding paragraphs.

26 62. PLAINTIFF was subjected to retaliation by DEFENDANTS during the course of his
27 employment for complaining about discrimination and harassment based on his marital status.
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1 63. PLAINTIFF was subjected to disadvantageous work assignments, barred from working
2 with his wife, and had higher level duties removed and was required to perform paralegal duties
3 for lower lever attorneys.

4 64. PLAINTIFF was harmed as a result of the DEFENDANTS' conduct.

5 65. DEFENDANTS' conduct was a substantial factor in causing PLAINTIFF'S harm.

6 66. As a proximate result of the conduct of DEFENDANTS, and each of them, PLAINTIFF
7 has suffered general and special damages in a sum according to proof, but which amount
8 exceeds the jurisdictional minimum of this Court, with interest at the maximum legal rate.

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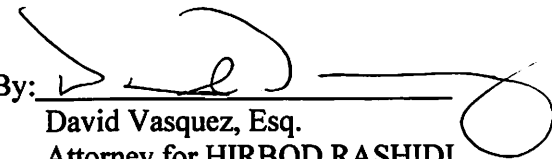
PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF prays for judgment against DEFENDANTS as follows:

- (1) For compensatory damages and other special and general damages according to proof on each cause of action;
- (2) For an award of attorney fees;
- (3) For an award of interest, including prejudgment interest, at the legal rate;
- (4) For an award to PLAINTIFF of the costs of suit incurred;
- (5) For such other and further relief as this court deems just and proper.

LAW OFFICES OF DAVID VASQUEZ

Dated: 2/29/24

By: 
David Vasquez, Esq.
Attorney for HIRBOD RASHIDI

DEMAND FOR JURY TRIAL

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3 PLAINTIFF demands a trial by jury.
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6 **LAW OFFICES OF DAVID VASQUEZ**

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9 Dated: 2/29/24

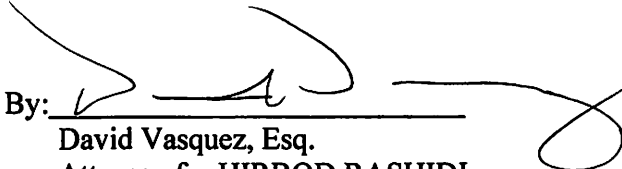
By: 
David Vasquez, Esq.
Attorney for HIRBOD RASHIDI

Exhibit-1

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 Hirbod Rashidi

CRD No. 202402-23799729

8 Complainant,

9 vs.

10 County of Riverside
11 4080 Lemon St
12 Riverside, CA 92501

13 Kimberly Britt

14 ,

15 Elizabeth Lawrence

16 ,

17 Respondents

18 _____
19 **1. Respondent County of Riverside is an employer** subject to suit under the California Fair
20 Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2. Complainant is naming Kimberly Britt** individual as Co-Respondent(s).
22 Complainant is naming **Elizabeth Lawrence** individual as Co-Respondent(s).

23 **3. Complainant Hirbod Rashidi, resides in the City of San Bernardino, State of CA.**

24 **4. Complainant alleges that on or about February 26, 2024, respondent took the**
25 **following adverse actions:**

26 **Complainant was harassed** because of complainant's marital status.

27 **Complainant was discriminated against** because of complainant's marital status and as a
28 result of the discrimination was denied hire or promotion, other, denied work opportunities or
assignments.

1 **Complainant experienced retaliation** because complainant reported or resisted any form
2 of discrimination or harassment and as a result was denied hire or promotion, reprimanded,
3 denied work opportunities or assignments.

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Additional Complaint Details:

1 VERIFICATION

2 I, **David Vasquez**, 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 February 29, 2024, I declare under penalty of perjury under the laws of the State
6 of California that the foregoing is true and correct.

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San Bernardino, CA