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Etan Z. Lorant, Esq.  
Yael Trock, Esq.,  
LAW OFFICES OF ETAN Z. LORANT  
5850 Canoga Avenue, Ste. 400  
Woodland Hills, California 91367

*John  
A  
Lorant  
bruce*

*Alonzo  
2010*

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

SEP 07 2010

John A. Clarke, Executive Officer/Clerk  
By *[Signature]* Deputy  
RUGENA LOBEZ

Attorneys for Plaintiff,  
JAMES MEE.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES  
CENTRAL DISTRICT**

JAMES MEE,  
Plaintiff,  
vs.  
COUNTY OF LOS ANGELES;  
and DOES 1 through 50, inclusive,  
Defendants.

CASE NO.: BC444914

**COMPLAINT FOR DAMAGES:**

1. FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT (DISCRIMINATION ON ACCOUNT OF RELIGION)
2. RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT
3. FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT (HARRASEMENT / HOSTILE WORK ENVIRONMENT)

**DEMAND FOR JURY TRIAL**

CIT/CASE: BC444914 LEA/DEW  
RECEIPT #: CCR477280SD  
DATE PAID: 09/07/10 12:28:57 PM  
PAYMENT: \$355.00  
RECEIVED: 0310  
CHECK: 355.00  
CASH:  
CHANGE  
CARD:



1 **FIRST CAUSE OF ACTION**  
2 **FOR VIOLATIONS OF THE CALIFORNIA FAIR EMPLOYMENT**  
3 **AND HOUSING ACT (RELIGIOUS DISCRIMINATION)**  
4 **AGAINST ALL DEFENDANTS**  
5

6 5. Plaintiff incorporates the allegations in paragraphs 1 through 4, inclusive,  
7 as though fully set forth herein.

8 6. Plaintiff was hired by Defendant COUNTY OF LOS ANGELES as a Sheriff  
9 Deputy on May 10, 1989. At all relevant times herein, Plaintiff was, and is, a Jewish male, and  
10 at all relevant times herein, Defendants herein knew that Plaintiff is of the Jewish faith. During  
11 the course of his employment with Defendants, Plaintiff performed his various responsibilities in  
12 an exemplary fashion, received favorable performance reviews, competent employee evaluations,  
13 and capably performed each and every condition of the employment agreement.  
14

15 7. On July 28, 2006, while assigned to the Lost Hills Sheriff's Station - Malibu  
16 Patrol Area, Plaintiff, Los Angeles Sheriff Deputy JAMES MEE, arrested Mel Gibson for  
17 Driving Under the Influence of Alcohol ("DUI").  
18

19 8. At or around the time of his arrest, Mr. Gibson was a spokesperson for the Los  
20 Angeles Sheriff's Star Organization, which is an organization run by, supported and  
21 administered, by the Los Angeles Sheriff's Department and Defendant COUNTY OF LOS  
22 ANGELES. Mr. Gibson had previously filmed a Public Service Announcement for Sheriff  
23 Baca's Relief Committee dressed in Los Angeles Sheriff Uniform, and standing by a Sheriff's  
24 patrol vehicle. Additionally, Mr. Gibson was, a close friend of Sheriff Baca, and had close  
25 associations with the top administration personnel of the Los Angeles Sheriff's Department. Mr.  
26 Gibson and Plaintiff's supervisor Sergeant Finch were also members of the same church.  
27

28 ///

1           9.       During his arrest by Plaintiff for a "DUI" on July 28, 2006, Mr. Gibson shouted  
2 numerous anti-Semitic remarks, asked Plaintiff if he was "a fucking Jew," shouted "the Jews are  
3 responsible for all the wars in the world!", and threatened to cause Plaintiff trouble at his work  
4 with the Los Angeles Sheriff Department.  
5

6           10.       In the Early morning hours of July 29, 2006, Plaintiff submitted his report of the  
7 arrest of Mr. Gibson. The report described the specific inflammatory and discriminatory religious  
8 slurs made by Mel Gibson against Jews and against Deputy JAMES MEE for being Jewish.  
9 Shortly after submitting the initial report which included a description of the anti-Semitic slurs of  
10 Mel Gibson, Plaintiff was ordered by his Watch Commander Lieutenant Crystal Miranda and his  
11 Watch Sergeant Kevin Finch to delete the anti-Semitic slurs that were made by Mr. Gibson, and  
12 in addition, to write a Supplemental Report that would describe the anti-Semitic slurs which  
13 would then be marked 'confidential' and sealed in a safe. Believing that the anti-Semitic slurs  
14 clearly revealed religious discrimination by a known Spokesperson for the Los Angeles Sheriff's  
15 Department, as well as show the level of toxicity of Mr. Gibson, Plaintiff protested to erasing the  
16 anti-Semitic slurs from his report. Regardless of Plaintiff's protest, Plaintiff received a "direct  
17 order" by Commander Lieutenant Miranda and Sergeant Finch to delete the anti-Semitic slurs  
18 from the arrest report (effectively participating in covering-up the anti-Semitic posture of Mr.  
19 Gibson by sealing the description of the discriminatory remarks secretly in a safe.) *The Order*  
20 *to delete the anti-Semitic slurs was discriminatory toward Plaintiff who is Jewish.*  
21  
22

23           11.       Some time around the arrest of Mel Gibson, four pages from Plaintiff's initial  
24 arrest report of Mr. Gibson were leaked by an unidentified person(s) to the internet site of Harvey  
25 Levin, "TMZ", and were published as "Gibson's Anti-Semitic Tirade - Alleged Cover Up." From  
26 early on, Mr. Levin denied that his source was Plaintiff, and there was no evidence whatsoever  
27 that Plaintiff was the person who leaked said pages.  
28

1           12.    On August 1, 2006, Plaintiff was unjustly accused of, investigated for, and  
2 interrogated by Internal Affairs Bureau regarding the leakage of the Mel Gibson arrest report  
3 which contained the anti-Semitic remarks. *Despite the fact that a number of non-Jewish deputies*  
4 *had access to the report and to the copy machines nearby, Defendants only accused Plaintiff of*  
5 *leaking the report to "TMZ," and initiated an Internal Affairs investigation only against him.*  
6 Defendants only accused Plaintiff and initiated an internal affairs investigation against him  
7 because he is Jewish, and because he described anti-Semitic remarks in the arrest report of Mel  
8 Gibson, Defendants' Spokesperson and close associate of the Sheriff and the Sheriff Department.  
9 Furthermore, Defendants violated Plaintiff's due process rights in that they intentionally took  
10 approximately 4 years to complete the investigation, despite the fact that an earlier resolution was  
11 procedurally required, and despite the fact that the delay impacted Plaintiff's ability to promote.  
12

13           13.    As further religious discrimination and retaliation by Defendants, on August 2,  
14 2006, Plaintiff was removed from the prestigious Lost Hills Station - Malibu Patrol Area, where  
15 he had been assigned for a long time, and where he was established at and was very familiar  
16 with, and *involuntarily* transferred by Defendants to the Agoura Patrol Area. At the Agoura  
17 Patrol Area, Plaintiff was forced to re-establish his seniority and contacts with the public.  
18 Furthermore, Plaintiff's ability to promote was impacted by said involuntary transfer to the  
19 Agoura Patrol Area in that Plaintiff was forced to have a reduced productivity level, and thus, a  
20 reduced ability to promote with Defendant COUNTY OF LOS ANGELES.  
21

22           14.    On August 23, 2006, Plaintiff was unjustly served with a negative Performance  
23 Log report by Sergeant Tracy Palmer who was Plaintiff's supervisor during said arrest of Mel  
24 Gibson, and whom Plaintiff accused of erasing a portion of the videotape of the booking of Mel  
25 Gibson. Said Performance Log report negatively impacted Plaintiff's ability to promote with  
26 Defendant COUNTY OF LOS ANGELES, and was instigated in order to further discriminate  
27  
28

1 and retaliate against Plaintiff for reporting anti-Semitic remarks by Defendants' Spokesperson  
2 and for being Jewish.

3 15. Around August 31, 2006, and around October 2, 2007, despite the fact that  
4 Plaintiff applied for, and was well qualified for the position of a Traffic Investigator, Plaintiff  
5 was unjustly denied the position. Plaintiff believes and hereby alleges that the failure to promote  
6 him was motivated in whole or in part by his religion and his report of anti-Semitic remarks by  
7 Defendants' Spokesperson.  
8

9 16. On September 13, 2006, Plaintiff was unjustly served by Defendant COUNTY OF  
10 LOS ANGELES with a Search Warrant for his bank accounts and home, and his personal  
11 computer(s) were removed. No incriminating evidence whatsoever was found in Plaintiff's home  
12 or in his bank accounts. The solicitation and service of the search warrant and negative  
13 information about Plaintiff constituted further religious discrimination and retaliation within the  
14 meaning of *California Government Code Section 12940, et seq.* *None of the homes of the other*  
15 *non-Jewish deputies were searched even though several of them had access to the initial Mel*  
16 *Gibson's arrest report as well.*  
17

18 17. On October 20, 2006, while Plaintiff was working the Early Morning Shift,  
19 Sergeant Tracy Palmer attempted to entice Plaintiff's partner, Rebecca Smith, to leave work early  
20 so that Plaintiff's safety would be compromised (since he would have to work the shift by  
21 himself without any backup), so as to create the appearance that no other deputy wanted to work  
22 with Plaintiff.  
23

24 18. Defendant COUNTY OF LOS ANGELES and Lt. Stephen actively and  
25 affirmatively solicited a citizen's complaint against Plaintiff from Lisa Kellog who had a  
26 personal relationship with Sheriff Baca and Mel Gibson, but was not present during the alleged  
27 incident described in the citizen's complaint. Plaintiff believes and hereby alleges that the active  
28

1 solicitation of an unfounded complaint against him was motivated in whole or in part by his  
2 religion and his report of anti-Semitic remarks by Defendants' Spokesperson.

3  
4 19. As further religious discrimination and retaliation, on December 1, 2006, Lt.  
5 Stephens wrongfully initiated an Internal Investigation against Plaintiff in connection with a  
6 complaint by an arrestee. There was no sufficient basis whatsoever to initiate the Internal Affairs  
7 investigation against Plaintiff.

8  
9 20. On December 2, 2006, Sergeant Palmer again retaliated against Plaintiff when she  
10 demanded that he return from patrol to the Station to complete a Vehicle Inspection Sheet, which  
11 he had already filled-out as he did for many years, and which was already accepted by Sergeant  
12 Crooker.

13  
14 21. On December 4, 2006, Plaintiff complained to Defendant's ombudsperson that he  
15 suffered retaliation by Sgt. Palmer because Plaintiff had disclosed that Sgt. Palmer had erased a  
16 videotape involving the arrest of Mel Gibson and the fact that Sergeant Finch told Mr. Gibson  
17 they are members of the same Church. Yet, Plaintiff's complaint was ignored.

18  
19 22. On September 6, 2007, Plaintiff was served by Defendant COUNTY OF LOS  
20 ANGELES with a disciplinary Letter of Intent to suspend him for three (3) days, and was so  
21 suspended. The suspension was motivated in whole or in part by Plaintiff's religion and his  
22 report of anti-Semitic remarks by Defendants' Spokesperson, Mel Gibson.

23  
24 23. Around October 10, 2006, despite the fact that Plaintiff applied for, and was well  
25 qualified for, the position of Station Court Deputy, Plaintiff was unjustly denied the position. A  
26 less-qualified deputy was chosen for the position. Again, the failure to promote was the result of  
27 religious discrimination and retaliation for Plaintiff's religion and his report of anti-Semitic  
28 remarks by Defendants' Spokesperson.

///

1           24.    Around February 2008, Plaintiff was wrongfully placed by Captain Martin on  
2 Unit Level Performance Review/Performance Monitoring, which negatively affected his ability  
3 to promote. A Performance Review was rarely used, if at all, by Defendants, and was used in  
4 Plaintiff's case for the sole reason of further retaliating against him for reporting Anti-Semitism  
5 by Defendant's Spokesperson. There was nothing unusual about Plaintiff's performance in  
6 comparison to other deputies serving similar lengths of time. Plaintiff believes, and hereby  
7 alleges, that the failure to promote him was motivated in whole or in part by his religion and his  
8 report of anti-Semitic remarks by Defendants' Spokesperson.  
9

10           25.    On June 2, 2008, Defendant conducted a Command Review Hearing regarding  
11 Plaintiff's performance review.  
12

13           26.    On June 7, 2008, despite the fact that Plaintiff applied for, was well qualified for,  
14 and was recommended to, the position of Traffic Services Deputy at Risk Management Bureau-  
15 Traffic Services Detail, Plaintiff was unjustly denied the position as further retaliation and  
16 discrimination. A less-qualified deputy was chosen for the position despite the fact that Plaintiff  
17 had a reasonable expectation to be selected for the position under the competitive promotion  
18 system.  
19

20           27.    On August 27, 2008, Plaintiff applied for the position of a Motorcycle Deputy  
21 with Transit Services Bureau, with the support of Lt. Lewis. Despite the fact that Plaintiff was  
22 placed on a list of qualified candidates, he was, once again overlooked for the position because of  
23 his religion and his report of anti-Semitic remarks by Defendants' Spokesperson, Mel Gibson.  
24

25           28.    On September 18, 2008, Plaintiff again applied for the position of a Motorcycle  
26 Deputy with the Lancaster Station, with the support of Lt. Lewis. Despite the fact that Plaintiff  
27 was placed on a list of qualified candidates, he was overlooked for the position. A less-qualified  
28 deputy was chosen for the position.

1           29.     Furthermore, Defendants attempted to cause criminal charges to be filed against  
2 Plaintiff, but on July 21, 2009, the Los Angeles County District Attorney's Office rejected any  
3 criminal filing against Plaintiff for Defendant's allegations of criminal conduct by Plaintiff in  
4 connection with the arrest of Mel Gibson. Nonetheless, the religious discrimination and  
5 retaliation against Plaintiff continued.  
6

7           30.     On August 28, 2009, Plaintiff once again applied for the position of a Motorcycle  
8 Deputy with the Lost Hills Station. But once again, despite the fact that Plaintiff was placed on a  
9 list of qualified candidates, he was overlooked for the position. The position remained vacant.  
10

11           31.     On May 27, 2010, in a useless, discriminatory and retaliatory 'fishing-expedition'  
12 against Plaintiff, Defendant re-initiated an additional Internal Affairs investigation again against  
13 him in connection with the July 28, 2006 Mel Gibson arrest. The investigation concluded as  
14 'unresolved' when it should have been concluded as 'unfounded' in light of the fact that there  
15 was no evidence whatsoever against Plaintiff.  
16

17           32.     Defendants discriminated against Plaintiff as described herein because Plaintiff is  
18 Jewish, and because Plaintiff complained of anti-Semitic slurs by Mel Gibson, a Spokesperson  
19 for, and close associate of, Defendants, and a friend of Sheriff Baca.  
20

21           33.     The aforementioned unlawful employment practices on the part of defendants, and  
22 each of them, were a substantial factor in causing damages and injuries to Plaintiff as set forth  
23 below.  
24

25           34.     Said actions and conduct of defendants, and each of them, consisting of  
26 the aforementioned religious discrimination and retaliation against Plaintiff constitute unlawful  
27 employment practices under *California Government Code* Sections 12940 et. seq. Further, the  
28 failure of defendants and each of them, and or their managing agents to take all reasonable steps  
to remedy and/or prevent discrimination in response to the continuing acts and course of conduct

1 of employees and managing agents of defendants, despite having knowledge thereof, constitute,  
2 among other things, violations of Sections 12940(h), 12940(i) and 12940(k) of the *California*  
3 *Government Code*.

4  
5 35. Plaintiff has duly filed administrative complaints with the California Department  
6 of Fair Employment and Housing ("DFEH") substantially alleging the acts and conduct of  
7 defendants as herein above described. The Department issued a "right-to-sue" notice on or about  
8 June 1, 2010. A true and correct copy of said notice is attached hereto as Exhibit "1".

9  
10 36. As a result of the aforesaid unlawful acts of defendants, and each of them,  
11 Plaintiff has lost and will continue to lose income, in an amount to be proven at time of trial.  
12 Plaintiff claims such amount as damages together with prejudgment interest pursuant to  
13 *California Civil Code* Section 3287 and/or any other provision of law providing for prejudgment  
14 interest.

15  
16 37. As a result of the aforesaid unlawful acts of defendants, and each of them,  
17 Plaintiff was personally humiliated and has become mentally upset, distressed and aggravated.  
18 Plaintiff claims general damages for such mental distress and aggravation in an amount of be  
19 proven at time of trial.

20 **SECOND CAUSE OF ACTION FOR RETALIATION IN VIOLATION OF**  
21 **THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT**  
22 **AGAINST ALL DEFENDANTS**

23  
24 38. Plaintiff incorporates by reference the allegations of paragraphs 1 through  
25 37 as if set forth in full herein.

26  
27 39. The conduct of Defendants and each of them as set forth above constituted  
28 retaliation thereby creating a continuing violation actionable under, among other things,  
*California Government Code* Section 12940 et seq.

1           40.    *The retaliatory conduct as described above, was motivated in whole or in part, by*  
2 *Plaintiff's report of religious epithets against Jews by Mel Gibson, a Spokesperson for*  
3 *Defendant COUNTY OF LOS ANGELES and the Los Angeles Sheriff Department, and Plaintiff*  
4 *being a member of the Jewish religion.*

5  
6           41.    The aforementioned unlawful employment practices on the part of defendants, and  
7 each of them, were a substantial factor in causing damages and injuries to Plaintiff as set forth  
8 below.

9           42.    Said actions and conduct of defendants, and each of them, consisting of  
10 the aforementioned religious discrimination and retaliation against Plaintiff constitute unlawful  
11 employment practices under *California Government Code* Section 12940 et seq. Further, the  
12 failure of defendants and each of them, and or their managing agents to take all reasonable steps  
13 to remedy and/or prevent discrimination in response to the  
14 continuing acts and course of conduct of employees and managing agents of defendants, despite  
15 having knowledge thereof, constitute, among other things, violations of Sections 12940(h),  
16 12940(i) and 12940 (k) of the *California Government Code*.

17  
18           43.    Plaintiff has duly filed administrative complaints with the California Department  
19 of Fair Employment and Housing ("DFEH") substantially alleging the acts and conduct of  
20 defendants as herein above described. The Department issued a "right-to-sue" notice on or about  
21 June 1, 2010. A true and correct copy of said notice is attached hereto as Exhibit "1".  
22

23           44.    As a result of the aforesaid unlawful acts of defendants, and each of them,  
24 Plaintiff has lost and will continue to lose income, in an amount to be proven at time of trial.  
25 Plaintiff claims such amount as damages together with prejudgment interest pursuant to  
26 *California Civil Code* Section 3287 and/or any other provision of law providing for prejudgment  
27 interest.  
28

1 45. As a result of the aforesaid unlawful acts of defendants, and each of them,  
2 Plaintiff was personally humiliated and has become mentally upset, distressed and aggravated.  
3 Plaintiff claims general damages for such mental distress and aggravation in an amount of be  
4 proven at time of trial.  
5

6 **THIRD CAUSE OF ACTION FOR VIOLATIONS OF THE CALIFORNIA FAIR**  
7 **EMPLOYMENT AND HOUSING ACT -HARASSMENT/HOSTILE WORK**  
8 **ENVIRONMENT AGAINST ALL DEFENDANTS**

9 46. Plaintiff incorporates by reference the allegations of paragraphs 1 through  
10 45 as if set forth in full herein.  
11

12 47. The conduct as set forth above constituted harassment/hostile work environment  
13 thereby creating a continuing violation actionable under, among other things, *California*  
14 *Government Code Section 12940(j)*. Moreover, the conduct of Defendants' employees and agents  
15 as described herein was outside the scope necessary for the job performance, and made for  
16 meanness or bigotry.  
17

18 48. *The retaliatory conduct as described above, was motivated in whole or in part, by*  
19 *Plaintiff's report of religious epithets against Jews by Mel Gibson, a Spokesperson for*  
20 *Defendant COUNTY OF LOS ANGELES and the Los Angeles Sheriff Department, and Plaintiff*  
21 *being a member of the Jewish religion.*

22 49. Plaintiff hereby alleges that Defendants herein failed to protect him from religious  
23 discrimination, retaliation and harassment, and allowed a hostile work environment to exist at the  
24 Los Angeles Sheriff's Department. Furthermore, Defendant COUNTY OF LOS ANGELES  
25 failed to take all reasonable steps necessary to prevent the wrongs alleged herein in this  
26 Complaint.  
27

28 ///

1           50.    The aforementioned unlawful employment practices on the part of defendants, and  
2 each of them, were a substantial factor in causing damages and injuries to Plaintiff as set forth  
3 below.

4           51.    Said actions and conduct of defendants, and each of them, consisting of the  
5 aforementioned religious harassment, religious discrimination and retaliation against Plaintiff  
6 constitute unlawful employment practices under *California Government Code* Section 12940 et  
7 seq. Further, the failure of defendants and each of them, and or their managing agents to take all  
8 reasonable steps to remedy and/or prevent discrimination in response to the continuing acts and  
9 course of conduct of employees and managing agents of defendants, despite having knowledge  
10 thereof, constitute, among other things, violations of Sections 12940(h), 12940(i), 12940(j), and  
11 12940 (k) of the *California Government Code*.

12           52.    Plaintiff has duly filed administrative complaints with the California Department  
13 of Fair Employment and Housing ("DFEH") substantially alleging the acts and conduct of  
14 defendants as herein above described. The Department issued a "right-to-sue" notice on or about  
15 June 1, 2010. A true and correct copy of said notice is attached hereto as Exhibit "1".

16           53.    As a result of the aforesaid unlawful acts of defendants, and each of them,  
17 Plaintiff has lost and will continue to lose income, in an amount to be proven at time of trial.  
18 Plaintiff claims such amount as damages together with prejudgment interest pursuant to  
19 *California Civil Code* Section 3287 and/or any other provision of law providing for prejudgment  
20 interest.

21           54.    As a result of the aforesaid unlawful acts of defendants, and each of them,  
22 Plaintiff was personally humiliated and has become mentally upset, distressed and aggravated.  
23 Plaintiff claims general damages for such mental distress and aggravation in an amount of to be  
24 proven at time of trial.

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WHEREFORE, Plaintiff, JAMES MEE, seeks judgment against all Defendants, and each of them, on all Causes of Action for:

1. Actual, consequential and incidental losses, including but not limited to loss of income, benefits and medical expenses, according to proof, together with prejudgment interest;
2. General damages for emotional distress and mental suffering in a sum according to proof;
3. Attorneys fees pursuant *California Government Code* Section 12965(b);
4. Costs of suit herein; and
5. Such other and further relief as the Court may deem proper.

Dated: September 2, 2010

LAW OFFICES OF ETAN Z. LORANT

By:

  
ETAN Z. LORANT  
Yael Trock  
Attorneys for Plaintiff, JAMES MEE

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**DEMAND FOR JURY**

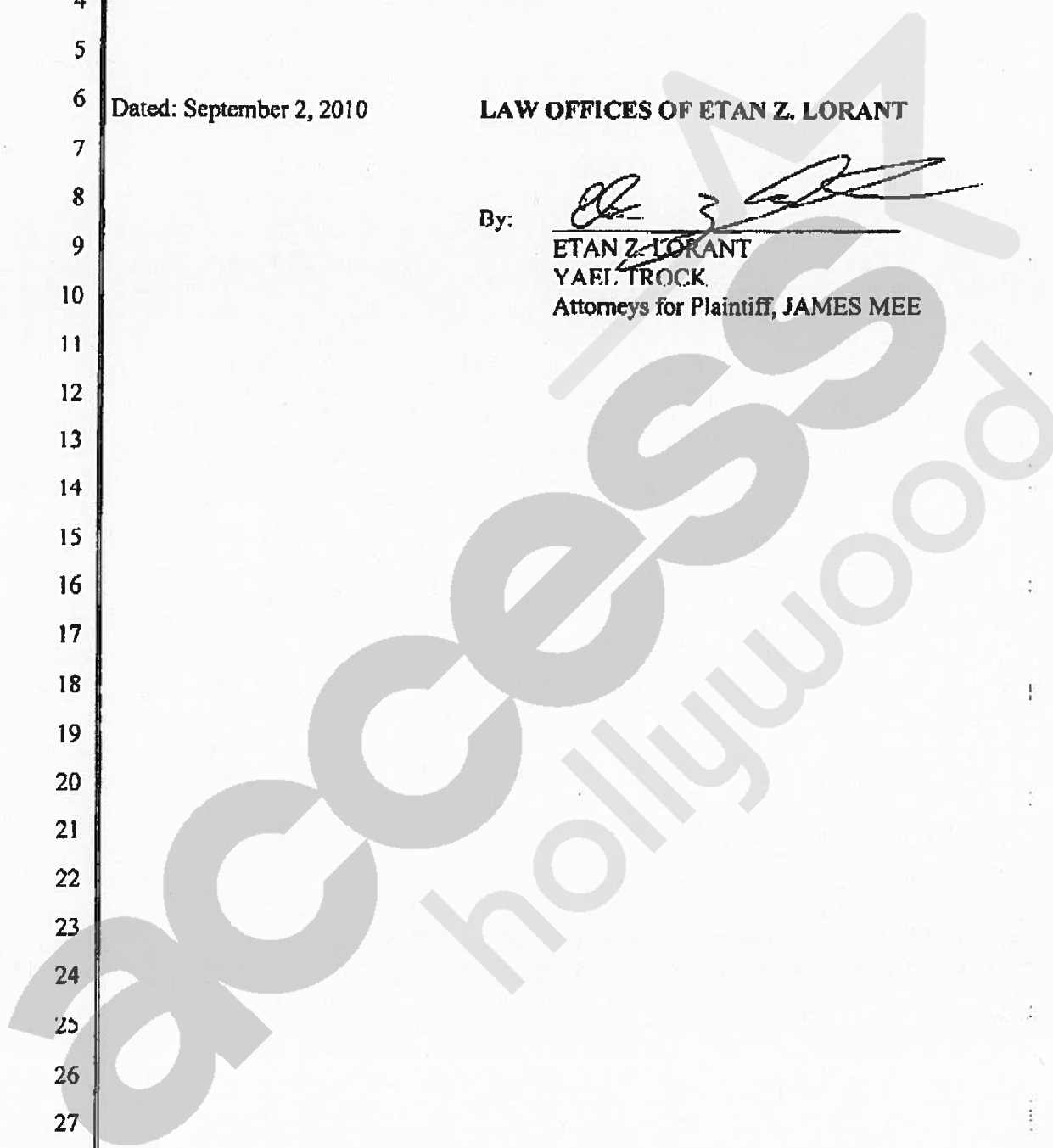
Plaintiff, JAMES MEE, hereby respectfully demand a Jury Trial.

Dated: September 2, 2010

**LAW OFFICES OF ETAN Z. LORANT**

By:

  
\_\_\_\_\_  
ETAN Z. LORANT  
YAEI. TROCK  
Attorneys for Plaintiff, JAMES MEE



09/02/10

BT 7/26/13

access  
hollywood

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1055 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017

www.dfeh.ca.gov



June 01, 2010

RE: E200910R6502-00  
MEE/COUNTY OF LOS ANGELES

**NOTICE TO COMPLAINANT'S ATTORNEY**

Enclosed is a copy of your client's complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also enclosed is a copy of your client's Notice of Case Closure, which constitutes your client's right-to-sue notice. Pursuant to Government Code section 12962, DFEH will not serve these documents on the employer.

Please refer to the enclosed Notice of Case Closure for information regarding filing a private lawsuit in the State of California.

Sincerely,

*Tina Walker*

Tina Walker  
District Administrator

Enclosure: Complaint of Discrimination  
Notice of Case Closure

DFEH-200-06 (01/08)

09/15/10

EXIT 1

\*\*\* EMPLOYMENT \*\*\*

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DFEH #

E200910R6502-00

DFEH USE ONLY

CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

YOUR NAME (indicate Mr. or Ms.)

TELEPHONE NUMBER (INDICATE AREA CODE)

MEE, JAMES

ADDRESS

CITY/STATE/ZIP

COUNTY

COUNTY CODE

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

NAME

TELEPHONE NUMBER (Include Area Code)

COUNTY OF LOS ANGELES

ADDRESS

DFEH USE ONLY

CITY/STATE/ZIP

COUNTY

COUNTY CODE

LOS ANGELES

037

NO. OF EMPLOYEES/MEMBERS (if known)

DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (month, day, and year)

RESPONDENT CODE

100+

06/01/2010

00

THE PARTICULARS ARE:

I allege that on about or before 06/01/2010, the following conduct occurred:

- termination, laid off, demotion, harassment, genetic characteristics testing, constructive discharge (forced to quit), impermissible non-job-related inquiry, denial of employment, denial of promotion, denial of transfer, denial of accommodation, failure to prevent discrimination or retaliation, X retaliation, X other (specify) Discrimination based upon religion (Jewish), denial of family of medical leave, denial of pregnancy leave, denial of equal pay, denial of right to wear pants, denial of pregnancy accommodation

by COUNTY OF LOS ANGELES

because of:

- Name of Person, Job Title (supervisor/manager/personnel director/etc.), sex, national origin/ancestry, disability (physical or mental), X retaliation for engaging in protected activity or requesting a protected leave or accommodation, age, marital status, medical condition (cancer or genetic characteristic), X religion, sexual orientation, generic characteristic, race/color, association, other (specify)

State of what you believe to be the reason(s) for discrimination

I WAS DISCRIMINATED AGAINST BASED UPON MY RELIGION (JEWISH) FOR ARRESTING MEL GIBSON (A KNOWN CHRISTIAN PRODUCER/ACTOR WHO MADE CONTROVERSIAL MOVIES INVOLVING JEWS AND CHRISTIANITY) AND FOR INSISTING ON WRITING A COMPLETE AND ACCURATE POLICE REPORT WHICH INCLUDED ANTI-SEMITIC SLURS MADE BY MR. GIBSON AGAINST ME AND JEWS IN GENERAL.

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right-to-sue. I understand that if I want a federal notice of right-to-sue, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elected Court Action."

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge except as to matters stated on my information and belief, and as to those matters I believe it to be true.

Dated 06/01/2010

At Los Angeles

DATE FILED: 06/01/2010

DFEH-300-03b (02/08) DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

STATE OF CALIFORNIA

BT 23 168

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1400 WEST 7TH STREET, SUITE 1400, LOS ANGELES, CA 90017

www.dfeh.ca.gov



June 01, 2010

MEE, JAMES  
C/O LAW OFFICES OF ETAN Z. LORANT, 5850 CANOGA  
AVE #400  
WOODLAND HILLS, CA 91367

RE: E200910R6502-00  
MEE/COUNTY OF LOS ANGELES

Dear MEE, JAMES:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective June 01, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the 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.

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

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

*Tina Walker*

Tina Walker  
District Administrator

cc: Case File

ETAN LORANT  
ATTORNEY  
LAW OFFICES OF ETAN Z. LORANT  
5850 CANOGA AVE., STE 400  
WOODLAND HILLS, CA 91367