



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

August 1, 2023

Emilia Arutunian
755 Front Street
San Diego, CA 92101

RE: Notice to Complainant's Attorney
CRD Matter Number: 202308-21487502
Right to Sue: Boyd / San Diego Unified School District Police Department et al.

Dear Emilia Arutunian:

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

August 1, 2023

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202308-21487502

Right to Sue: Boyd / San Diego Unified School District Police Department 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

August 1, 2023

Keith Boyd

,

RE: Notice of Case Closure and Right to Sue

CRD Matter Number: 202308-21487502

Right to Sue: Boyd / San Diego Unified School District Police Department et al.

Dear Keith Boyd:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective August 1, 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 Keith Boyd

CRD No. 202308-21487502

8 Complainant,

9 vs.

10 San Diego Unified School District Police Department
11 4100 Normal Street, Room 2148
12 San Diego, CA 92103

13 Alfonso Contreras
14 4100 Normal Street
15 san diego, CA 92103

16 Jenifer Gruner
17 4100 Normal Street
18 San Diego, CA 92103

19 Lamont Jackson
20 4100 Normal Street
21 San Diego, CA 92103

22 Respondents

23
24
25 1. Respondent **San Diego Unified School District Police Department** is an **employer** subject
26 to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et
27 seq.).

28 2. Complainant is naming **Alfonso Contreras** individual as Co-Respondent(s).
Complainant is naming **Jenifer Gruner** individual as Co-Respondent(s).
Complainant is naming **Lamont Jackson** individual as Co-Respondent(s).

3. Complainant **Keith Boyd**, resides in the City of , State of .

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

-1-

Complaint – CRD No. 202308-21487502

Date Filed: August 1, 2023

1 **Complainant was harassed** because of complainant's ancestry, other, sexual harassment-
2 hostile environment, race (includes hairstyle and hair texture).

3 **Complainant was discriminated against** because of complainant's ancestry, other, sexual
4 harassment- hostile environment, race (includes hairstyle and hair texture) and as a result of
5 the discrimination was denied hire or promotion, reprimanded, demoted, asked
6 impermissible non-job-related questions, denied any employment benefit or privilege, other,
7 denied work opportunities or assignments, denied or forced to transfer.

8 **Complainant experienced retaliation** because complainant reported or resisted any form
9 of discrimination or harassment, participated as a witness in a discrimination or harassment
10 complaint and as a result was denied hire or promotion, reprimanded, demoted, asked
11 impermissible non-job-related questions, other, denied or forced to transfer.

12 **Additional Complaint Details:** Keith Boyd has been a police officer for nearly 25 years. He
13 served his first seven years as a Deputy Sheriff and the last seventeen years working in
14 various positions with the San Diego Unified School District Police Department ("SDUSD
15 PD"). During his time at SDUSD PD, he worked his way up in rank from police officer to
16 detective and, finally, Sergeant – the position he holds today. Mr. Boyd has an associate
17 degree and is currently finishing his bachelor's degree in Business Administration. Further,
18 he holds an Advanced California POST (Peace Officer Training and Standards) certificate,
19 an ICI (Institute from Criminal Investigations) Master Certificate, and will obtain his POST
20 Supervisor's certificate in December of 2023.

21 Throughout his twenty-five-year tenure, Mr. Boyd has been an exemplary employee, never
22 receiving any disciplinary actions or warnings. In fact, he has received numerous awards
23 and citations for his great work within law enforcement.

24 In or about June of 2022, Alfonso Contreras became Chief of Police for SDUSD PD. Upon
25 information and belief, Mr. Contreras had been in a long-term relationship with one of his
26 subordinates, Sergeant Jenifer Gruner, at the time he was appointed. Most of the
27 department was aware of the relationship at the time of his appointment and made attempts
28 to inquire to ensure the relationship would not affect their positions and career trajectories
within the Department. Mr. Contreras assured the officers he would act with integrity and
would not let the relationship affect his management of the Department. Unfortunately,
those promises did not come to fruition. With Mr. Contreras' appointment to Chief, the
relationship began to adversely affect the entire Department almost immediately. Indeed,
the relationship between the two creates divisiveness and a hostile work environment for
any member of the SDUSD PD who are not in support of Ms. Gruner, do not "take care of
her," praise her, and support her. The circle of individuals who do support the relationship is
commonly referred to as "The Club" and given special treatment and privileges. Two such
individuals include Operations Support Captain David Landman and Field Support Captain
Ivan Picazo. However, those outside of "The Club" were and continue to be continuously
harassed, demeaned, undermined, yelled at, defamed, and slandered, and have
experienced numerous other instances of hostile work environment.

1 Not only do Mr. Contreras and Ms. Gruner use their relationship and position of power to
2 adversely affect those not in “The Club,” but they also impose problems within their
3 relationship on the Department thus creating a hostile work environment. Often individuals
4 at the Department can hear the couple yelling and arguing with each other over clear
5 domestic issues that disguise themselves as work-related issues. Simple, menial “work-
6 related” disputes often turn into screaming matches. For example, Mr. Boyd was once
7 subjected to hearing Mr. Contreras and Ms. Gruner fight over connecting monitors for a
8 presentation when clearly the underlying issue was related to their relationship as evidenced
9 by the menial nature of the issue relative to the explosive nature of the argument.
10 Mr. Contreras has also given Ms. Gruner immense special privileges due to his high-ranking
11 position. Those privileges have only intensified since Mr. Contreras’ tenure as Chief,
12 including taking training time off to attend a Notre Dame football game with Chief Contreras,
13 (photos of which ended up plastered all over social media), not having to clock in and out of
14 her shifts, and other privileges.
15 Mr. Contreras extends Ms. Gruner’s privileges to her affirmative responsibilities at work.
16 While working on a burglary series, Ms. Gruner took burglary reports potentially associated
17 with the series but failed to submit the reports. When questioned about the reports, Ms.
18 Gruner submitted substandard reports that clearly indicated she did not recall the incidents
19 and provided no details relating to the crimes. While officers outside of “The Club” would
20 have been reprimanded for poorly handling the reports, Ms. Gruner continued her job as if
21 she had not done anything wrong.
22 Department members have also noticed Mr. Contreras allows Ms. Gruner to take extended
23 lunches, go to the nail salon while on duty, leave shifts early, and wear noncompliant
24 uniforms while on the clock, all without repercussions. Meanwhile, officers, like Mr. Boyd,
25 feel compelled to remain silent because of their relationship.
26 Mr. Contreras has also allowed Ms. Gruner the privilege of recording herself in the red book
27 for time off, whereas everyone else in the Department is required to have their supervisor
28 record them in the red book. While other officers would have been reprimanded for these
same actions, Mr. Contreras permits Ms. Gruner to openly violate Department policy.
Furthermore, Ms. Gruner has and continues to, abuse and harass her subordinates, often
publicly, in the presence of Mr. Contreras and other officers, without reprimand or discipline.
Mr. Boyd disapproves of the relationship and Ms. Gruner’s special treatment and is therefore
not part of “The Club.” As a result, over the last year, he has been treated like an outcast
and has experienced an extremely hostile work environment despite his consistent hard
work and efforts in building the Department.
Though the hostile environment has continued as Mr. Contreras built within his ranks, it
intensified and became more open and aggressive when he became Chief. In August of
2022, only a couple of months after Mr. Contreras’ appointment, during a Department
meeting, Captain Landman showed extreme disrespect to Mr. Boyd and his colleague Tom
Gray when they spoke about their agenda items. Mr. Landman did not show any disrespect
towards Ms. Gruner during her agenda items. This public disparate treatment made clear to
everyone the hostile approach the new regime was taking to outsiders of “The Club” under
Mr. Contreras’ leadership.
In an event on October 3, 2022, Mr. Boyd was blamed and criticized for a decision made by
Mr. Picazo. On that day, Mr. Boyd responded to a stabbing at Rosa Parks Elementary
School. The San Diego Police Department (“SDPD”) was already on the scene, and the

1 incident commander, Sergeant Sylvia Yepiz, asked Mr. Boyd whether the SDUSD PD would
2 be taking the investigation. Mr. Boyd informed Ms. Yepiz he would have to check with his
3 team. Mr. Picazo was supposed to come onto the scene but never arrived, so Mr. Boyd
4 called him to inquire. Mr. Picazo sounded unhappy with the situation but ultimately said that
5 they would take the investigation because they relied heavily on SDPD and needed the
6 relationship. Mr. Boyd confirmed with Ms. Yepiz accordingly.

7 Later, Mr. Picazo told Mr. Boyd he relayed to Mr. Contreras that Mr. Boyd made the decision
8 to take over the investigation and asked Mr. Boyd to confirm the same to Mr. Contreras. Mr.
9 Boyd denied that he made any such decision and reminded him how the decision was
10 made. Mr. Picazo told him the Chief was not happy with the decision to take over the
11 investigation. The following day, Mr. Boyd was scheduled for a patrol rifle course. He asked
12 Mr. Picazo to not attend the course so he could complete the investigation. Mr. Picazo
13 denied his request and told him he would have to attend the course as planned.

14 Later that evening, however, Mr. Boyd received a text from Dispatcher Nicole Wilson letting
15 him know that Mr. Contreras was in dispatch and publicly stated something along the lines
16 of, "If Boyd got us into this shit, then he's going to have to take care of the whole thing. He
17 better have it all set up to pass off to a different Sergeant tomorrow. If it goes late then I'm
18 canceling his rifle school and will find a different fucking one for him to go to. When's his
19 normal day off?" Then whoever was on the phone must've told him tomorrow because he
20 rolled his eyes and said "Whatever. He needs to take care of this shit."

21 It was clear to Mr. Boyd that not only did Mr. Picazo throw him under the bus for taking over
22 the investigation, but also failed to tell Mr. Contreras that Mr. Boyd had requested not to
23 attend the rifle patrol course to finish the investigation and was denied. A few days later, this
24 incident was brought up during a weekly leadership meeting, and Chief Contreras told Mr.
25 Boyd, "Your name is not mud." At that time, Mr. Boyd attempted to again explain the
26 situation, including the fact that Mr. Picazo made the decision to take over the investigation,
27 and denied his request to get out of the patrol rifle school. Mr. Contreras responded
28 sarcastically that it was sweet music to hear that he was willing to not go to the school, and
how people will "have something big and leave it for someone else." Mr. Contreras publicly
humiliated Mr. Boyd in front of leadership despite following Mr. Picazo's direction in making
the decisions related to the stabbing. It made his role and obligation to follow the direction of
leadership confusing and unclear. In his twenty-five years of service, he had never
experienced such humiliation and disrespect.

Another such event occurred in October of 2022 during a leadership meeting when Mr.
Landman asked each of the sergeants how the body-worn cameras ("BWCs") were going.
Mr. Landman brought in Mr. Bonilla, an officer, and member of "The Club," also Mr. Boyd's
subordinate, who proceeded in a hostile manner to discuss approving reports on a
Department system called NetRMS and proceeded to angrily scream at everyone in an
unprofessional demeanor, telling them everything they were doing was wrong. Oddly, as a
subordinate to the sergeants, Mr. Bonilla presented on approving reports on NetRMS. Mr.
Boyd and Officer Luna mentioned they had not received those instructions before and
brought up the fact that officers may have been trained differently in previous departments.
Mr. Bonilla continued with his angry and demeaning rampage on the team (including his
superiors) for not having proper training. Several members of management attended the
meeting and permitted this inappropriate behavior, including Mr. Contreras, Mr. Landman,
Mr. Picazo, Ms. Gruner, and others.

1 After the meeting, Mr. Luna approached Mr. Gray and Mr. Boyd informing them that
2 he knew Mr. Bonilla “treats the troops like shit,” but expressed disbelief in the fact that he
3 was allowed to treat sergeants the same way in front of the command. Later after the meeting, Mr. Bonilla approached Mr. Gray and Mr. Boyd mockingly stating,
4 “You hate me now? You hate me now?” in a perceived attempt to poke fun at the
5 supervisors, knowing his superiors would cover for his inappropriate behavior. Furthermore, because of his exclusion from “The Club,” Mr. Boyd has not received his
6 evaluations for about two years which has undoubtedly affected his ability to grow within the
7 Department. Mr. Boyd reviewed his evaluations and signed them, after which they were to
8 go back to Mr. Contreras for final approval to be placed in his personnel file. However, Mr.
9 Boyd never received them back. Mr. Picazo said he thought he gave the evaluations to Mr.
10 Contreras, but Mr. Boyd never received the signed versions. To date, Mr. Boyd does not
11 know whether they were approved and added to his file because he gave up on his search
12 knowing it was futile. In January of 2023, there was a promotion ceremony held for “The Club” members including
13 Mr. Contreras, Mr. Picazo, Mr. Landman, and Mr. Bonilla. Around this time Mr. Boyd asked
14 for certain supervisor’s commendation letters, including Mr. Lozano for saving a school from
15 a fire and Mr. De La Torre for applying a tourniquet to a gunshot victim, so they could be
16 presented at the weekly line-up. Mr. Contreras told him to wait because they were going to
17 make the promotion ceremony an awards ceremony as well. However, Mr. Contreras lied to
18 Mr. Boyd, and the commendation letters were not presented at the ceremony. Thereafter, it
19 became clear that Mr. Contreras was toying with Mr. Boyd and attempting to prevent him
20 from recognizing his officers. Later in January, an incident occurred at Lincoln High School where a student surreptitiously
21 took a video of himself having sex with a female student and sent it to other students. The
22 student claimed he sent it because the female student told other students that he raped her
23 and that he was reporting it because he was now being threatened. Mr. Lozano was placed
24 on the investigation only for the distribution of child pornography – as there was no
25 allegation of rape at that time. A couple of weeks later, the high school students had a
26 protest of the school’s handling of the incident. During that protest, Ms. Gruner directed Mr.
27 Lozano not to do an arrest report, but instead an officer’s report with an incident type of
28 “Miscellaneous report.” Mr. Lozano did not feel comfortable with Ms. Gruner’s directive and
complained to Mr. Boyd. Mr. Boyd agreed with Mr. Lozano that there should have been an
arrest report and a notification of the SDPD Sex Crimes unit in light of the rape allegation.
Still, since Ms. Gruner was the Supervisory Sergeant on the matter, he told Mr. Lozano to
follow her order. Mr. Boyd approved Mr. Lozano’s report and e-mailed Ms. Gruner that it was
ready, but that he felt it should be an arrest report. Ms. Gruner then claimed that she wanted
an arrest report with a “miscellaneous report” for the incident type.
Just a few days later, during a meeting with Ms. Gruner, Mr. Landman, and Mr. Picazo, Ms.
Gruner began attacking Mr. Lozano for the officer’s report. She said the report should have
been an arrest report, which ironically, Mr. Lozano started before she told him to change it.
Rather than allow Mr. Lozano to explain himself in front of his superiors, she cut him off,
refused to take responsibility for her directive, and claimed she taught him better. She then
began attacking Mr. Boyd saying, “Your sergeant should have called Sex Crimes, every
other sergeant knows this.” Ms. Gruner blamed Mr. Lozano for “hiding things” (referring to
the alleged rape), though she knew there had been no rape allegation when the report was

1 initially drafted. In fact, Ms. Gruner was the first supervisor to become aware of the rape
2 allegation and was supposed to contact SDPD Sex Crimes and notify Mr. Picazo but failed
3 to do so. Ms. Gruner took no responsibility for the wrong report being written and the failure
4 to notify Sex Crimes. This incident led to further harassment by Mr. Picazo and other
5 members of "The Club."

6 In February, Mr. Picazo called Mr. Boyd into his office and began interrogating him about the
7 rape allegation. Mr. Boyd relayed the information he knew and what had happened based
8 on his understanding. Mr. Picazo attacked Mr. Boyd, stating that he and Mr. Lozano handled
9 the situation incorrectly. Mr. Boyd explained that they were following Ms. Gruner's direction,
10 and further, that there were witnesses to the conversation with Ms. Gruner wherein she
11 directed Mr. Lozano to file a Miscellaneous Report. Despite this, Mr. Picazo refused to listen.
12 In normal circumstances, this level of dishonesty would have ended the career of any other
13 sergeant, but Ms. Gruner's position as Mr. Contreras' girlfriend protected her from taking any
14 of the downfalls for the mistake and instead dropped all fault on Mr. Lozano and Ms. Boyd.
15 The next day, Mr. Boyd was supposed to go on a trip with his wife but began experiencing
16 extreme emotional distress, and what appeared to be the physical manifestations of a panic
17 attack. He felt extremely stressed, began to have a stomachache, and was overtaken with
18 adrenaline again and again. Mr. Boyd squeezed the steering wheel, and his head was
19 forced to the side and couldn't straighten up. He could not properly control the wheel and
20 had to stop the vehicle to calm himself. These physical manifestations lasted for many days
21 after this incident and were a direct result of Mr. Contreras and "The Club's" hostile
22 treatment.

23 On or about February 7, 2023, not long after this incident between Mr. Picazo and Mr. Boyd,
24 Mr. Picazo changed Mr. Gray's scheduled assignments which placed Mr. Boyd in a new
25 position. Mr. Boyd, unhappy with the change, asked for the reason for the change. Mr.
26 Picazo explained that Mr. Boyd had the "historical background" and would be a better fit for
27 the new position. Mr. Boyd believes that this change was a result of favoritism towards Mr.
28 Bonilla, and further harassment towards Mr. Boyd in light of his disagreements with Ms.
Gruner. That same day, Mr. Boyd asked to meet with Mr. Picazo to discuss leaving the
southwest area and taking over the west area instead. Mr. Picazo and Mr. Contreras invited
him to discuss, but rather than discussing assignments, they began harassing Mr. Boyd
about his personal life and health issues, causing extreme discomfort and further emotional
distress. Mr. Picazo and Mr. Contreras kept mocking and belittling Mr. Boyd by asking him if
he was okay, whether he got bad news in his personal life, and demanding to know how his
physical therapy was going. Mr. Boyd had an MRI scheduled for the following, and Mr.
Picazo kept asking if he got bad news from the MRI results. Mr. Boyd told Mr. Picazo his
MRI wasn't until the following week, so Mr. Picazo told him about another employee who
went in for an MRI for back pain and found out he had kidney cancer.
Mr. Picazo and Mr. Contreras went forward with discussing his transfer request and gave
him a hard time for using the word "immediately" in his email request for transfer. Mr.
Contreras asked why he wanted the transfer. Mr. Boyd explained that with it being the
busiest service area, the level of work in the area created more opportunities for the
administration to lie, create hostility, and harass him. Mr. Contreras asked if he was referring
to the Department's command and asked for examples. Mr. Boyd did not feel comfortable
giving examples, as he knew the harassment and incidents were a result of him not being
part of "The Club" in support of Mr. Contreras' relationship with Ms. Gruner. In a hostile

1 manner, Mr. Contreras responded, "Maybe being sergeant was more work than you
2 expected." Mr. Boyd was taken aback as it turned out his complaint of harassment merely
3 invited further hostile behavior. He told Mr. Contreras he would end up on stress leave if
4 something didn't change.

5 It was clear to Mr. Boyd that Mr. Contreras and Mr. Picazo did not want Mr. Bonilla, a
6 member of "The Club," working in a difficult area. He brought up situations of other officers
7 who were transferred due to stress and told Mr. Contreras he felt he was receiving different
8 treatment and being retaliated against by leadership. Mr. Contreras did not budge, saying
9 that since he wasn't well, his performance could potentially drop, and therefore he was not
10 willing to transfer Mr. Boyd. Later that day, the Department promoted Mr. Bonilla to Sergeant
11 in the north area pursuant to his request, while Mr. Gray and Mr. Boyd were to stay in their
12 current areas.

13 In February 2023, Mr. Boyd followed up with leadership inquiring whether he could present
14 the officers' commendation letters before placing them in their personnel files. Mr. Picazo
15 refused to allow Mr. Boyd to present them, stating the letters were already in their files.
16 Eventually, the officers received their letters and confirmation that they were in fact included
17 in the files, but they were significantly delayed and not according to procedure. Not
18 coincidentally, the officers set to receive the commendations are not part of "The Club," and
19 this was just another strategy to prevent them from being recognized.

20 Later, on February 24, 2023, Mr. Picazo called Mr. Boyd into his office and again tried to
21 interrogate him about the incident with the rape allegation at Lincoln High School. Mr.
22 Picazo again tried to blame Mr. Boyd for Ms. Gruner's mistake regarding the failure to
23 contact SDPD Sex Crimes. Mr. Boyd held his ground reminding Mr. Picazo that there were
24 witnesses to the conversation between Mr. Lozano and Ms. Gruner wherein she was
25 notified of the rape allegation. Mr. Picazo went on to threaten Mr. Boyd with a write-up for
26 the incident. Still, Mr. Boyd refused to give in and lie to cover up Ms. Gruner's mistake,
27 notwithstanding the hostility and pressure from Mr. Picazo. Mr. Picazo's interrogation of Mr.
28 Boyd violated his POBRA rights.

The following week, at the weekly leadership meeting, Mr. Boyd asked again for his officer's
commendation letters to give to the officers. Mr. Picazo claimed they were already in the
officer's files and refused to provide them. After the meeting, Mr. Boyd approached Mr.
Contreras' secretary, Ann-Marie Palma-Kinoshita, requesting copies of the letters. However,
Ms. Palma-Kinoshita only found Mr. Lozano's commendation letter. Mr. Picazo lied about
putting the other officers' commendation letters in their files. The commendation letters,
given to various officers for saving a building from significant fire, performing a tourniquet to
a gunshot victim, and saving a woman from committing suicide off the side of a bridge, aid
officers in qualifying for promotions and growth within the Department. Had Mr. Boyd not
aggressively followed up on these letters, Mr. Picazo's dishonesty would have prevented the
officers from significant growth in their careers.

Shortly after this incident, Mr. Picazo changed officers' days off in Mr. Boyd's Southeast
area, significantly affecting Mr. Lozano's schedule. There was no reason given for the
change other than implied reason, which was to target Mr. Boyd and Mr. Lozano for not
helping "The Club."

In light of the increasingly hostile work environment, on May 19, 2023, the San Diego Police
Officers Association ("POA") held a special meeting at the request of numerous members to
vote on formally requesting the district to place Mr. Contreras, Mr. Landman, and Ms.

1 Gruner on paid admin leave pending completion of the district's investigation into time theft.
A vote also took place asking members to letter grade the morale within the Department.
2 The results were astonishing. Regarding placing "The Club" on admin leave the votes tallied
Yes: 19, No: 7. The results of the morale vote were A: 0, B: 1, C: 5, D: 8, F: 11. Attorney
3 Brad Fields drafted a letter for the POA to deliver to the district senior leadership. The letter,
4 on behalf of the membership, formally requested that Mr. Contreras, Mr. Landman, and Ms.
Gruner be placed on paid admin leave pending the outcome of the investigation.

5 Shortly thereafter, at a weekly leadership meeting, Mr. Picazo laughed at the
situation, telling the officers that they "should not go home because [he was] stressing them
6 out. They should be used to it. They should be resilient. They should do right because of
peer pressure." This made the officers uncomfortable, exacerbated the already existing
7 hostility, and directly implied that the officers should aid "The Club's" interests, which he
referred to as peer pressure.

8 Mr. Boyd also led the Mobile Field Force Team ("MFF"), but even that position was
compromised in light of the Department's hostility. Mr. Contreras constantly undermined Mr.
9 Boyd's efforts within the team and ignored him. In June of 2023, Mr. Boyd could no longer
deal with the harassment by members of "The Club" and quit his leadership position. He told
10 Mr. Picazo his reason for leaving, but Mr. Picazo did not respond and did not tell anyone
why Mr. Boyd quit.

11 Mr. Boyd has reached a point where his emotional distress from the harassment and
discrimination is so extensive that he is hesitant and afraid to make any suggestions or
12 speak at leadership meetings. Mr. Boyd has been targeted, harassed, humiliated, and
defamed constantly, as well as wrongly framed for Ms. Gruner's and other members of "The
13 Club's" wrongdoings. Mr. Boyd's work situation has caused extreme emotional distress and
problems in his personal life daily, including adrenaline rushes, depression, and panic
14 attacks. Even Mr. Boyd's wife has been distressed and depressed from the situations he
continues to deal with daily.

15 "The Club's" most recent display of hostility occurred no more than a month from the
date of this complaint. On July 11 and 12, 2023, the Department hosted an annual summer
16 training for school resources officers. The 2022 annual summer training was coordinated
and run solely by members of "The Club." This year though, Mr. Contreras claimed the
17 annual summer training would be open to other members of the Department who wanted
the opportunity. Unfortunately, this was another promise unfulfilled. Instead, the opportunity
18 to coordinate, run, or conduct trainings was granted only to individuals in "The Club."

19 Given the nature of the Department's promotion process, these opportunities
significantly impact an individual's ability to rank high enough in the process to be selected
20 for promotion. Thus, individuals not in "The Club" are unable to compete for promotion with
those in "The Club" merely because they do not take care of, praise, and support Mr.
21 Contreras and Ms. Gruner's relationship.

1 VERIFICATION

2 I, **Emilia Arutunian, Esq.**, am the **Attorney** in the above-entitled complaint. I have
3 read the foregoing complaint and know the contents thereof. The matters alleged are
4 based on information and belief, which I believe to be true.

5 On August 1, 2023, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **San Diego, CA**

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

Date Filed: August 1, 2023

28