



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: 202308-21486602
Right to Sue: Corado / 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



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August 1, 2023

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202308-21486602

Right to Sue: Corado / 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,

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August 1, 2023

William Corado

,

RE: Notice of Case Closure and Right to Sue

CRD Matter Number: 202308-21486602

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

Dear William Corado:

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 William Corado

CRD No. 202308-21486602

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 **William Corado**, resides in the City of , State of .

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

1 **Complainant was harassed** because of complainant's ancestry, national origin (includes
2 language restrictions), color, gender identity or expression, genetic information or
3 characteristic, other, sexual harassment- hostile environment, race (includes hairstyle and
hair texture).

4 **Complainant was discriminated against** because of complainant's ancestry, national
5 origin (includes language restrictions), color, genetic information or characteristic, other,
6 sexual harassment- hostile environment, race (includes hairstyle and hair texture) and as a
7 result of the discrimination was denied hire or promotion, reprimanded, demoted, denied any
employment benefit or privilege, other, 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, denied any
employment benefit or privilege, other, denied work opportunities or assignments, denied or
forced to transfer.

11
12 **Additional Complaint Details:** William Corado has been with the San Diego Unified School
District Police Department ("SDUSD PD" or "Department") for over 27 years. Originally hired
13 as a teacher's aide in 1996, Mr. Corado built his way up the ranks to a police officer after
graduating from the 40th class of the Southwestern College Police Academy in 2005.

14 Throughout his tenure, Mr. Corado has always completed his job with integrity and pride,
15 including participating in extracurricular and volunteer activities and events for the
betterment and success of the Youth. Mr. Corado received exemplary performance reviews
and had a shining reputation, including a Commanding Officer's Citation from a San Diego
16 Police Captain recognizing his assistance in arresting three subjects involved in a crime
spree in 2019 and being selected as Officer of the Year in 2020.

17 In or about June of 2022, Alfonso Contreras became Chief of Police for SDUSD PD. Upon
information and belief, Mr. Contreras had been in a long-term relationship with one of his
18 subordinates, Sergeant Jenifer Gruner, at the time he was appointed. Most of the
Department was aware of the relationship at the time of his appointment and made attempts
19 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
20 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
21 relationship began to adversely affect the entire Department almost immediately. Indeed,
the relationship between the two creates divisiveness and a hostile work environment for
22 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
23 commonly referred to as "The Club" and given special treatment and privileges. Two such
24 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
25

1 harassed, demeaned, undermined, yelled at, defamed, slandered, and have experienced
2 numerous other instances of hostile work environment.
3 Ms. Gruner has received immense special privileges due to Mr. Contreras' high position.
4 Those privileges have only intensified since Mr. Contreras' tenure as chief, including taking
5 training time off to attend a Notre Dame football game with Chief Contreras, (photos of
6 which ended up plastered all over social media), not having to clock in and out of her shifts,
7 and other privileges. Department members also noticed Ms. Gruner took long lunches, went
8 to the nail salon while on duty, left her shifts early, and failed to wear her uniform while on
9 the clock. She was also given the privilege of recording herself in the red book for time off,
10 whereas everyone else in the Department was required to have their supervisor record them
11 in the red book. While other officers would have been reprimanded for these same actions,
12 Ms. Gruner seemingly got away with it regardless of whether it followed Department policy
13 or not. Furthermore, Ms. Gruner abused and harassed her subordinates, often publicly, in
14 the presence of Mr. Contreras and other officers, without reprimand or discipline.

15 Mr. Corado did not support the relationship in the way Mr. Contreras and Ms. Gruner
16 wanted and was therefore not part of "The Club." As a result, he was treated differently and
17 discriminated against by Mr. Contreras and his posse, even before Mr. Contreras became
18 chief.

19 In 2021, Mr. Corado was involved in an incident where an individual claiming to be
20 part of the media attempted to bait Mr. Corado into acting inappropriately while on camera.
21 Mr. Contreras and Ms. Gruner refused to fully investigate the incident or make any attempts
22 to stand up for Mr. Corado. Instead, they sent him home and pulled him from working in the
23 field for approximately eight months. The internal investigation ultimately determined that Mr.
24 Corado did not commit any criminal acts, though he was found guilty of not providing his
25 name and badge number. As a result, the investigating officer, David Landman
26 recommended a three-day suspension without pay. However, Mr. Landman did not consider
27 Mr. Corado's recognitions in making these findings. In August 2022, Mr. Corado and his
28 attorney presented Mr. Corado's version of the case to the Department's Human Resources
representatives, who reduced Mr. Landman's recommendations to a "letter of reprimand."
To date, he has not received this letter.

On May 19, 2022, at a police appreciation event hosted by a Clark Middle School teacher,
during a ceremonial presentation, Officer Roberto Bonilla, who at the time was the Police
Officer Association ("POA") President, approached Mr. Corado with his phone held to either
take a picture or video. Mr. Corado jokingly said, "Not even our POA president would do this
for us." Mr. Bonilla responded in Spanish stating, "Hey puto, cuando quieras, we can step
aside and handle it," which translates into "Hey faggot, whenever you want, we can step
aside and handle it." Mr. Corado felt embarrassed in front of his fellow officers and
perceived this to be a challenge to fight. Mr. Corado responded lightheartedly stating, "Hey
mija [daughter], why are you being so serious? I was just kidding." The conversation
concluded with Mr. Bonilla stating, "That's what you need. Someone to call you out. We can
step aside and talk." After this conversation, all separately, Detective Arellano, Detective
Marcos Gobby, and Officer Julian Gonzales expressed to Mr. Corado their support for him
and disdain for Mr. Bonilla's behavior. Unfortunately, it does not appear this was ever
investigated or addressed.

In January 2023, Mr. Corado followed up with Mr. Contreras requesting an update regarding
the status of his complaint. Mr. Contreras responded that it had been resolved while he was

1 in his position as Captain and said he concluded the fact-finding from the named witnesses.
2 However, Mr. Corado later found out that Mr. Contreras reached out to one of the witnesses
3 immediately after his follow-up email, merely days before. Mr. Corado has not received any
4 clear resolution to the incident to date, nor any indication it was properly investigated or
5 addressed. In fact, on February 7, 2023, it was announced that Mr. Bonilla was promoted to
6 sergeant. A few months later In June 2023 it was announced that Mr Bonilla now Sergeant,
7 had stepped into a leadership position as team leader for the Mobile Field Force despite the
8 pending complaint against him. Mr. Contreras' pitfalls as a leader caused Mr. Corado to feel
9 obligated to step down from the team while a member of "The Club" promoted because of
10 the same.

11 In addition to the hostile and harassing behavior described above, Mr. Corado has also
12 been exposed to racist remarks and behaviors as a result of his El Salvadorian roots during
13 his tenure. Mr. Contreras has referred to Mr. Corado as "ESL" (referring to English as a
14 Second Language), and "ESL speaking motherfucker." This started during Mr. Contreras'
15 tenure as a sergeant, but the racist remarks and behavior have continued since he has
16 become chief. Furthermore, because Mr. Corado is from El Salvador, Mr. Contreras and
17 Captain Picazo have called him "Mara Salvatrucha" and "MS-13" referencing the notorious
18 terrorist Salvadorian gang who mutilate, brutalize, and torture their victims.
19 Mr. Corado has experienced emotional distress, anxiety, lost sleep, and depression as a
20 result of his treatment within the Department, which he attributes to being a member outside
21 of "The Club." He has further been distressed by the lack of ethics, integrity, and leadership
22 in the Department, especially since Mr. Contreras' promotion to chief.

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

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
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.
Contreras and Ms. Gruner's relationship.

1 VERIFICATION

2 I, **Emilia Arutunian**, am the **Attorney** in the above-entitled complaint. I have read
3 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.

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San Diego, CA