



Civil Rights Department

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

October 17, 2023

Jeff Liu

,

RE: **Notice to Complainant**

CRD Matter Number: [REDACTED]

Right to Sue: Liu / County of San Diego et al.

Dear Jeff Liu:

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. If you do not have an attorney, you must serve the complaint yourself. 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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October 17, 2023

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: [REDACTED]

Right to Sue: Liu / County of San Diego 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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October 17, 2023

Jeff Liu

,

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: [REDACTED]
Right to Sue: Liu / County of San Diego et al.

Dear Jeff Liu:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective October 17, 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

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

In the Matter of the Complaint of

Jeff Liu

CRD No. [REDACTED]

Complainant,

vs.

County of San Diego

,

County of San Diego Board of Supervisors

,

Denice Garcia

,

Respondents

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

2. Complainant is naming **County of San Diego Board of Supervisors** business as Co-Respondent(s).

Complainant is naming **Denice Garcia** individual as Co-Respondent(s).

3. Complainant **Jeff Liu**, resides in the City of , State of .

4. Complainant alleges that on or about **October 17, 2023**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's ancestry, national origin (includes language restrictions), color, race (includes hairstyle and hair texture) and as a result of the discrimination was terminated, laid off, denied hire or promotion, denied any employment benefit or privilege, other, denied work opportunities or assignments.

Additional Complaint Details: 1. I worked for March For Our Lives from May 2018 until September 15, 2023. My last position was Director of Public and Government

1 Affairs. I was paid about \$158,000 per year. I received positive performance feedback, I was
2 never placed on a performance improvement plan or similar formal performance coaching
3 program, and I was never asked or encouraged by March For Our Lives to end my
4 employment.

5 2. I interviewed for a position at San Diego County on about August 2023. During
6 these interviews, I met with several of San Diego County's employees, including Denice
7 Garcia, David Flores, and Chairwoman Nora Vargas. I informed Denice Garcia and other of
8 Defendants' employees, during the interview process, that I lived in [REDACTED], California
9 and [REDACTED] California, splitting my time between both cities due to my work
10 responsibilities, and I would need to relocate to [REDACTED] to work for San Diego
11 County. I also provided San Diego County with a copy of my resume, which reflected my
12 living and working in [REDACTED] [REDACTED]

13 3. San Diego County extended me a conditional job offer for the position Director
14 of Policy and Legislative Affairs (Legislative Aid II) on September 11, 2023. San Diego
15 County's job offer included a promise to pay me an annual salary of \$95,000 and permit me
16 to receive employee benefits from San Diego County. San Diego County made this offer of
17 employment to me by e-mailing me a letter. This offer was conditioned on my passing a
18 background check and any necessary physical or drug examinations. The offer letter was
19 executed by Denice Garcia.

20 4. San Diego County decision to rescind my employment was based in
21 substantial part on my race, as evidenced by Denice Garcia's racist statements.

22 5. I accepted Defendants' offer of employment on September 11, 2023 by phone
23 call. I promptly submitted all required forms to Samantha Lanham, the clerk and my
24 designated point of contact at the Board of Supervisor's office and passed the tests on
25 which San Diego County conditioned my employment.

26 6. On about September 18, Denice Garcia called me and asked me how my
27 relocation efforts were progressing. Denice Garcia became agitated during this call and told
28 me to "hurry the fuck up" but she assured me that my job offer was secure and San Diego
County would not be rescinding its job offer to me. I acted urgently to try to relocate to [REDACTED]
[REDACTED] in reliance on this further assurance from Denice Garcia.

7. On about September 20, 2023, Denice Garcia again called me and asked me
about the status of his relocation efforts. I informed her that I had tentatively secured a new
apartment and that I believed I would soon be able to complete the relocation. During this
telephone call, Denice Garcia, Chief of Staff to Chairwoman Nora Vargas, muttered "fucking
Asians and yellow people, always so fucking slow, these chinks" and then she immediately
said more directly to me that she was glad everything was working out and that I should
continue to keep her updated. During this call, Denice Garcia again assured me that my job
was safe and the two of them discussed my start date.

1 8. I notified Defendants of my passing the required screenings on about
2 September 25, 2023 by text message sent to Denice Garcia. On information and belief, San
3 Diego County also received separate confirmation of the same from the entities or
4 individuals who performed the screenings.

5 9. I moved from [REDACTED], CA and [REDACTED], CA to [REDACTED] on about
6 September 25, 2023.

7 10. On September 11, 2023, I gave notice to March For Our Lives that I would be
8 resigning my employment at March For Our Lives.

9 11. From September 11, 2023 to September 26, 2023, I corresponded with Denice
10 Garcia, Antoinette Velazquez, and Samantha Lanham of San Diego County about my efforts
11 to relocate from [REDACTED] to [REDACTED]. All three individuals working for San Diego
12 County urged me to act quickly, and they inquired about my relocation efforts.

13 12. From September 11, 2023 to September 26, 2023, I incurred substantial
14 expenses to relocate from [REDACTED] to [REDACTED] including without limitation, about:
15 \$12,192 to terminate the lease at the apartment where I was residing when I accepted
16 employment for Defendants; \$11,000 in moving expenses; and \$4,315 to lease a new
17 apartment in San Diego.

18 13. On September 26, 2023, Denice Garcia of San Diego County emailed me and
19 rescinded its offer of employment. Denice Garcia also called me beforehand to inform me of
20 the same. During this phone call, Denice Garcia falsely told me that I never informed her
21 that I would be relocating to [REDACTED] to accept Defendants' offer of employment.

22 14. San Diego County rescinding its offer of employment to me, and Denice
23 Garcia's racist statements, has caused me to suffer emotional distress. I am not sure how to
24 quantify the amount of my emotional distress but I estimate, on information and belief, that I
25 have suffered about \$500,000 in emotional distress to date, and I will suffer an additional
26 \$500,000 in emotional distress in the future.

27 15. I predict that each month I am out of work I will incur about \$13,202 in lost
28 wages as well as about \$6,000 in lost employee benefits. I predict it will take me about one
year to find a new job comparable to my previous job.

1 VERIFICATION

2 I, **Jeff Liu**, am the **Complainant** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The same is true of my own
4 knowledge, except as to those matters which are therein alleged on information and
belief, and as to those matters, I believe it to be true.

5 On October 17, 2023, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 , CA