

CLAIM AGAINST THE CITY OF SAN DIEGO

Present claim by personal delivery or mail to the **City of San Diego, Risk Management Department, 1200 Third Avenue, Suite 1000, San Diego, CA 92101** Including the claimant's email address on the returned claim form is highly recommended. Claims for death, injury to person or personal property must be filed no later than six (6) months after the occurrence (Gov. Code Section 911.2). All other claims must be filed within one (1) year of the occurrence.

Time Stamp

***** = Required (Gov. Code Section 910)

Received Via Email US Mail Over the Counter Inter-Office Mail

A.				
Claimant Name* (First, Middle, Last) Stephanie Cockrell			Claimant Date of Birth 12 Mo 13 Day 1984 Year	
Claimant Address* 402 W. Broadway, fl. 21			Claimant Phone Number (619) 696-1100	
City* San Diego	State* CA	Zip* 92101	Claimant Social Security Number _____	

B.			
Send Official Notices and Correspondence To: * Emilia A. Arutunian, Esq.		Phone Number (619) 696-1100	
Address* 402 W. Broadway, fl. 21			
City* San Diego	State* CA	Zip* 92101	Email Address emilia@antonyanmiranda.com

C.					
Date of Incident*	Mo	Day	Year	Time of Incident	<input type="checkbox"/> AM <input type="checkbox"/> PM

Location of Incident or Accident (Be Specific)*
San Diego Police Department

Basis of Claim - State in detail all facts and circumstances of the incident.*
See attached.

State why you believe the City is responsible for the alleged injury, property damage, or loss
See attached.

D.
Description of Alleged Injury, Property Damage, or Loss* See attached.

CLAIM AGAINST THE CITY OF SAN DIEGO

Vehicle Information - If your claim relates to a motor vehicle or impound, provide the following information and attach proof of insurance and a copy of the current registration.

Year	Make of Vehicle	Model	License Plate No.	Driver's License No.
Insurance Company		Policy Number		Claim Number
Contact Name		Phone Number ()		Email Address

Additional Information - Please provide any additional information that might be helpful in considering your claim, including names of witnesses, treating physicians, hospitals, proof of damages such as invoices, receipts, estimates, a diagram, and photographs.

E.		
Name and Department of City Employee who Allegedly Caused Injury or Loss (If Known)*	City Vehicle Type/Description	License Plate No./Unit No.

F.	
Damages Claimed* - If your claim does not exceed ten thousand dollars (\$10,000), state the basis of your computation of the amount claimed. (Attach supporting medical bills, invoices, repair estimates, etc.)	
a. Amount claimed as of claim date	\$ _____
b. Estimated amount of future costs	\$ _____
Total Amount	\$ _____

If your claim exceeds ten thousand (\$10,000), Government Code 910(f) requires that you indicate whether or not the claim is a "limited civil case." Check one.*

Limited (up to \$25,000) **Unlimited** (over \$25,000)

G.

Signature* - Claim form **must** be signed by claimant or party filing the claim. (Gov. Code Section 910.2)

Warning: It is a criminal offense to file a false claim. (California Penal Code § 72). I have read the matters and statements made in the above claim and I know the same to be true of my own knowledge, except as to those matters stated upon information or belief and as to such matters. I believe the same to be true. I certify under penalty of perjury that the foregoing is true and correct.

Emilia Arutunian, attorney
Printed Name of Signatory and Relationship to Claimant

09/05/2025
Date

E. Arutunian
Signature of Claimant or Person Acting On Behalf of Claimant*

Attachment to the City of San Diego Government Claim

Basis of Claim - State in detail all facts and circumstances of the incident*:

Claimant Stephanie Cockrell (“Claimant”) began her career with the San Diego Police Department (the “Department”) on October 26, 2012, as a Deputy Officer. Throughout her more than thirteen years of service, Claimant consistently received outstanding performance reviews and was recognized for her dedication, professionalism, and commitment to public safety. Claimant fully intended to dedicate her entire career to the Department. However, despite her exemplary record, Claimant has been subjected to repeated and ongoing sexual harassment, discrimination, retaliation, and a failure by the Department to provide protection from such misconduct. As a result, she has been forced to work in a hostile, intolerable, and unsafe environment.

During her employment, Claimant met and later married fellow Deputy Officer Tyler Cockrell (“Cockrell”). The couple eventually had a child together. In June 2021, while Claimant was on maternity leave, she discovered that Cockrell was engaged in an extramarital affair with his subordinate, another Deputy Officer (hereinafter “Deputy X”). Recognizing the violation of Department policy created by a supervisor–subordinate relationship, Claimant reported the matter to a Lieutenant, who happened to be Deputy X’s uncle, and a ranking officer senior to Claimant, Cockrell, and Deputy X.

To make it appear he was following policy, the Lieutenant initiated an Internal Affairs (“IA”) investigation. However, the investigation was inadequate, incomplete and rushed. The IA investigators failed to review or credit Claimant’s substantial written evidence, including text messages, planner entries documenting events, and corroborating travel records, demonstrating the existence of the inappropriate relationship. Despite this evidence, and due to the investigators’ refusal to review highly relevant information, the investigation was quickly closed, and no meaningful action was taken against Cockrell or Deputy X.

Cockrell and Deputy X made every attempt to defame Claimant in retribution for her complaint. Cockrell attempted to file a police report against Claimant with the La Mesa Police Department, but when the department did nothing to address the allegations, he attempted to go through family court and obtain a restraining order. The Court denied the restraining order.

Still, Cockrell and Deputy X would not stop trying to destroy Claimant. In July 2022, Deputy X submitted internal allegations against Claimant. Cockrell and Deputy X proceeded to accuse Claimant of bullying and harassing them. These allegations triggered a biased and retaliatory IA investigation against Claimant. In contrast to the cursory review of Cockrell and Deputy X’s misconduct, the Department produced an investigative report and findings against Claimant. That report portrayed Cockrell as allegedly “fearing” Claimant, despite his being six feet five inches tall, a former Mixed Martial Arts (“MMA”) fighter, and a trained Deputy Officer. During the course and scope of the investigation, Claimant made every attempt to submit documents and

information in support of her position but the IA investigators failed to collect crucial information that would have strongly supported her defenses.

At the time, Chief of Police David Nisleit (“Nisleit”), a long-time personal friend of the Lieutenant who was Deputy X’s uncle, reviewed the IA report. Relying on the biased findings, Nisleit sustained multiple charges against Claimant and recommended her termination.

In contrast, Cockrell and Deputy X faced no discipline for their unethical and policy-violating supervisor–subordinate sexual relationship. To this day, Cockrell and Deputy X have openly continued their relationship and are expecting a child together. Despite making claims of bullying, harassment, and claiming fear for their lives at the hands of Claimant, they recently purchased a home only a mile away from Claimant’s home.

Claimant retained legal counsel and appealed the termination notice. Her legal team retained a private investigator, who produced a report corroborating Claimant’s original allegations against Cockrell and Deputy X. The investigator’s findings directly contradicted the testimony Cockrell and Deputy X had given to IA. Despite this evidence of misconduct and dishonesty by Cockrell and Deputy X, the Department failed to initiate any additional investigation into their conduct.

Shortly thereafter, Nisleit retired and was succeeded by Chief Scott Wahl (“Wahl”). Upon taking office, Chief Wahl reviewed numerous disciplinary cases. In numerous instances, he overturned terminations and recommended terminations of Deputy Officers, substituting lesser penalties instead. Upon information and belief Claimant was the only female Deputy Officer to have her termination overturned. Upon information and belief, Wahl overturned at least five male Deputy Officers’ terminations or recommended terminations. In Claimant’s case, Wahl specifically found that the IA report against Claimant (related to a domestic dispute and not her ability to perform her job) was insufficient to justify permanent termination.

While the male Deputy Officers with misconduct or termination recommendations had their cases overturned and reinstated without harassment, Claimant was met with immediate sexist backlash, harassment, and retaliation. Rumors spread like wildfire within the Department accusing her of having provided sexual favors to Chief Wahl in exchange for leniency. An anonymous letter was submitted to the City Council falsely alleging an extramarital affair between Claimant and Wahl.

These false rumors quickly escalated and were openly condoned by Claimant’s co-workers and supervisors at every level. Upon information and belief, the Department was aware of the rumors, and the discriminatory and harassing behavior that followed, but made no attempts to protect Claimant. Claimant’s ability to grow within the Department quickly faded. Claimant was placed on the promotion list for sergeant, and was denied the promotion.

By January 2025 the rumors had gotten so bad and widespread that the Department launched yet another targeted IA investigation against Claimant, this time concerning the fabricated allegations of a sexual relationship between her and Wahl. Claimant was repeatedly interrogated about her personal life, and the rumors. The process was humiliating and debilitating for Claimant, and caused extreme emotional distress. The rumors were so bad, people were even saying her son was a child of Wahl. Ultimately, the findings were unsubstantiated, because the rumors were untrue, but the investigation itself further damaged her reputation and credibility, especially as media got wind of the allegations and investigation.

Claimant made every effort to keep her head down and continue fulfilling her duties despite the emotional distress she was suffering. However, the daily harassment and retaliatory treatment continued to escalate. In February 2025, Claimant interviewed for another position within the Department but was again denied the opportunity.

By March 2025, the details of the rumors were leaked to local activist Tasha Williamson (“Williamson”), who published the rumors on social media, using Claimant’s name. Williamson publicly accused Claimant and Wahl of engaging in a sexual relationship involving nepotism and favoritism and publicly called for their removal.

As a result, Claimant continues to endure ongoing harassment, ridicule, and gossip from colleagues. On a daily basis, she is subjected to degrading questions about whether Wahl is “good in bed” and taunts implying she must be “bad in bed,” given her lack of promotion despite the alleged relationship. This pervasive harassment has left Claimant in an environment that is hostile, humiliating, and unsafe, forcing her to navigate a workplace poisoned by sexism, retaliation, and false accusations. The Department is aware of the treatment yet has failed to take any action to protect Claimant or punish the wrongdoers.

As of the date of this Claim, Claimant continues to endure ongoing harassment, retaliatory denial of opportunities, and a hostile work environment that has made her workplace intolerable, unsafe, and career-damaging.

State why you believe the City is responsible for the alleged injury, property damage, or loss:

The City of San Diego, and/or employees and agents are liable for discrimination, retaliation, and harassment alleged by Claimant pursuant to Government Code § 12926(d), Gov’t Code § 12940(j)(l), and Gov’t Code § 12940(j)(4)(C). Claimant started her career with the Department on October 26, 2012, as a Deputy Officer. Throughout her more than thirteen years of service, Claimant consistently received outstanding performance reviews and was recognized for her dedication, professionalism, and commitment to public safety. Claimant fully intended to dedicate her entire career to the Department. However, despite her exemplary record, Claimant has been subjected to repeated and ongoing sexual harassment, discrimination, retaliation, and a failure by the Department to provide protection from such misconduct. As a result, she has been

forced to work in a hostile, intolerable, and unsafe environment. Whereas, Claimant has the right to seek, obtain, and hold employment without discrimination based on her sex.

It is unlawful “[f]or an employer . . . because of . . . marital status, sex, gender . . . to harass an employee . . .” Government Code (“Gov’t Code”) §12940(j)(1). “[H]arassment” because of sex includes sexual harassment, gender harassment” and “need not be motivated by sexual desire.” Gov’t Code §12940(j)(4)(C). “Harassment of an employee . . . other than an agent or supervisor, shall be unlawful if the entity, or its agents or supervisors, knows or should have known of this conduct and fails to take immediate and appropriate corrective action.” Gov’t Code §12940(j)(1). Employers are strictly liable for sexual harassment by a supervisor. State Dep’t of Health Servs. v. Super. Ct., 31 Cal. 4th 1026, 1041 (2003). Further, “[a]n employee . . . is personally liable for any harassment prohibited by this section that is perpetrated by the employee, regardless of whether the employer or covered entity knows or should have known of the conduct and fails to take immediate and appropriate corrective action.” Gov’t Code §12940(j)(3). “An entity shall take all reasonable steps to prevent harassment from occurring. Loss of tangible job benefits shall not be necessary in order to establish harassment.” Gov’t Code §12940(j)(1).

The City directly employed Claimant, as defined in the Fair Employment and Housing Act (“FEHA”) at Government Code section 12926(d) at all relevant times herein. The City regularly employed five or more persons, bringing Defendant within the provisions of Gov. Code, §§ 12900 et seq. The City compelled, coerced, aided, and/or abetted the discrimination, retaliation, and harassment as alleged above, which is conduct strictly prohibited under California Government Code section 12940(i). All actions by the City were taken by employees, supervisors, executives, officers, and directors during Claimant’s employment.

As a proximate result of City’s wrongful conduct by their agents and employees, Claimant has suffered, and continues to suffer, substantial losses in earnings, earning capacity, and other benefits of employment, all in an amount to be determined according to proof at the time of trial. As a further proximate result of the City’s wrongful conduct, Claimant has suffered, and continues to suffer, humiliation, embarrassment, emotional distress, and mental anguish.

Description of Alleged Injury, Property, or Loss*:

Claimant suffered and continues to suffer from economic damages including but not limited to lost wages and benefits, and noneconomic damages including emotional distress and mental suffering.

Damages Claimed:

The total amount of damages will be according to proof. Damages are based on past, present, and future medical expenses, past and future economic loss, other economic damages, and past, present, and future non-economic damages.