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12 Attorneys for Plaintiffs

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF SAN DIEGO
15 HALL OF JUSTICE

16 THEA BACHMANN;
17 JASON BALISTRERI;
18 JODIE BOEGER;
19 TANIA JACKSON;
20 STEPHANIE MACCECA;
21 CHANSAMONE O'MEARA;
22 NICOLE SABELL-STOLTZ;
23 SUZANNE SANNWALD; and
24 ANGELA SCOTT, as Individuals,

25 Plaintiffs,

26 v.

27 GROSSMONT UNION HIGH SCHOOL
28 DISTRICT;
GROSSMONT UNION HIGH SCHOOL
DISTRICT BOARD OF TRUSTEES; and
DOES 1-25, Inclusive,

Defendants.

Case No.:

COMPLAINT FOR COMPENSATORY
DAMAGES AND EQUITABLE RELIEF

DEMAND FOR JURY TRIAL

1 Plaintiffs Thea Bachmann, Jason Balistreri, Jodie Boeger, Tania Jackson, Stephanie
 2 Maceca, Chansamone O’Meara, Nicole SaBell-Stoltz, Suzanne Sannwald, and Angela Scott
 3 (“Plaintiffs”), by their attorneys, brings this action on behalf of themselves against Defendants
 4 Grossmont Union High School District (“GUHSD”), Grossmont Union High School District Board
 5 of Trustees (the “GUHSD Board”), and DOES 1-25 (collectively, “Defendants”). Plaintiffs make
 6 the following allegations upon information and belief (except those allegations as to Plaintiffs or
 7 their attorneys which are based on personal knowledge), based upon an investigation that is
 8 reasonable under the circumstances, which allegations are likely to have evidentiary support after a
 9 reasonable opportunity for further investigation and/or discovery.

10 NATURE OF THE ACTION

11 1. School board elections, once considered minor ballot races by voters, have taken on
 12 new significance in recent years. Across the country, extreme conservative and religious action
 13 groups have targeted local school board races to seize control of public education systems. Their
 14 objective is explicit: to dismantle diversity, equity, and inclusion (“DEI”) initiatives and replace
 15 secular, inclusive curricula with ideologically driven agendas hostile to LGBTQ communities. This
 16 fringe movement has become so pervasive and harmful that, on September 25, 2023, California’s
 17 Governor signed into law Assembly Bill (“AB”) 1078, prohibiting school boards from banning
 18 books based on LGBTQ content¹ and affirmatively requiring school districts to foster equitable
 19 learning environments in which all students and staff—including LGBTQ individuals—are
 20 welcomed and protected.²

21 2. That same anti-diversity movement has taken hold in San Diego County and
 22 embedded itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
 23

24
 25 ¹ “LGBTQ” is an abbreviation for lesbian, gay, bisexual, transgender, queer or questioning,
 26 intersex, asexual, and more. These terms are used to describe a person’s sexual orientation or gender
 identity or expression. It is also often referred to as LGBTQ+ or LGBTQIA+.

27 ² See Office of Governor Gavin Newsom, *California Bans Book Bans and Textbook*
 28 *Censorship in Schools* (Sept. 25, 2023), <https://www.gov.ca.gov/2023/09/25/california-bans-book-bans-and-textbook-censorship-in-schools/>.

1 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
2 member Board. Each of these Board members is a white male with deeply held Christian beliefs
3 that are opposed to diversity and LGBTQ inclusion in public education. They are staunch believers
4 in and vocal advocates of “East County Values,” which they have unequivocally defined as being
5 anti-LGBTQ and “anti-woke.”³ Meaning, even though California has clear anti-discrimination laws,
6 the majority board members believe they are above the law and can impose a Christian, anti-LGBTQ
7 agenda in a public school system on GUHSD’s students and staff.

8 3. As discussed below, the Anti-LGBTQ Board Members did not act alone. With the
9 assistance of their co-conspirators—including their private attorney, John Wayne Howard (“Mr.
10 Howard”), and his former paralegal turned district administrator, Jerry Hobbs (“Mr. Hobbs”)—they
11 engaged in deceptive and fraudulent schemes to manipulate elections, mislead voters, and
12 unlawfully obtain and retain control of the GUHSD Board. Once in power, the Anti-LGBTQ Board
13 Members made their discriminatory agenda unmistakably clear. They have unashamedly displayed
14 their anti-LGBTQ views in open public board meeting sessions and in internal text messages and
15 emails later revealed through media reporting.⁴ In direct violation of California anti-discrimination
16 laws, the Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
17 purge the District of LGBTQ-allyship programs and personnel. Their actions include, among other
18 things: banning books with LGBTQ content; terminating a long-standing relationship with a mental
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20
21 ³ “Anti-woke” is a term used by opponents of anti-discriminatory social movements to
22 mockingly imply that “wokeness” is insincere performative activism. The term is used to mock the
23 pro-diversity community for being “woke” on social injustice as if discrimination, prejudice, and
social injustice in the United States is artificial.

24 ⁴ Lest there be any doubt of their discriminatory bias, one need only review the videotaped
25 board meetings on July 20, 2023, and subsequent dates, or the internal communications published
26 by the San Diego Union-Tribune on June 15, 2025, revealing explicit discussions of targeting
27 librarians for their LGBTQ+ advocacy and “woke” book selections. *See* GUHSD Board Meeting
28 Videos, <https://vimeo.com/user19457081> (last visited Jan. 29, 2026); *see also* Kristin Taketa &
Jemma Stephenson, *Grossmont school trustees regularly discussed board business in private texts
and emails*, S.D. UNION TRIBUNE, June 13, 2025,
[https://www.sandiegouniontribune.com/2025/06/13/grossmont-school-trustees-regularly-
discussed-board-business-in-private-texts-and-emails/](https://www.sandiegouniontribune.com/2025/06/13/grossmont-school-trustees-regularly-discussed-board-business-in-private-texts-and-emails/).

1 health provider solely because it served LGBTQ youth; canceling professional development
2 programs that included LGBTQ-related materials; interfering with hiring decisions to exclude
3 candidates perceived as “woke” or LGBTQ-supportive; and taking adverse employment actions
4 against staff who support LGBTQ students or challenge the Board’s campaign to eradicate DEI from
5 the District, including the nine Plaintiffs in this action.

6 4. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
7 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O’Meara, Nicole SaBell-Stoltz, Suzanne
8 Sannwald, and Angela Scott (collectively, the “Librarians”). These Librarians served GUHSD for a
9 combined total of over 100 years of exemplary service. As professional educators entrusted with
10 managing school libraries and creating safe spaces for all students, the Librarians were responsible
11 under California law for providing students with LGBTQ resources and diverse reading materials.
12 They created welcoming environments where LGBTQ students and staff felt safe and supported.
13 They posted “All Are Welcome Here” signs in their libraries, wore ally badges, and publicly
14 advocated for LGBTQ resources and initiatives. They opposed the Board’s book censorship efforts,
15 defended intellectual freedom, and spoke at board meetings against discriminatory policies. In short,
16 they embodied the very values that California law mandates and that the Anti-LGBTQ Board
17 Members sought to dismantle.

18 5. Because of this, the Librarians became targets of a coordinated campaign of
19 harassment, discrimination, retaliation, and ideological persecution orchestrated by the Anti-
20 LGBTQ Board Members and their co-conspirators. Despite their outstanding performance records
21 and critical role in student learning, the Librarians were subjected to escalating adverse actions,
22 including: refusal to hear their concerns at Board meetings, suppression of efforts to establish a
23 transparent and equitable book-approval process, surveillance of their internet activity, threats of
24 litigation, micromanagement of library purchasing decisions, unwarranted disciplinary actions, and
25 systematic efforts to undermine their professional authority. Internal communications revealed
26 through California Public Records Act (“CPRA”) requests show the Anti-LGBTQ Board Members
27 and their co-conspirators discussing plans to “end DEI,” “micromanage library purchases,” “freeze
28 all library funds,” and target the Librarians who purchased “woke books” or supported LGBTQ

1 students. In other words, the District’s adverse actions against the Librarians were motivated by
2 explicit animus toward LGBTQ individuals and their advocates, and by hostility toward perceived
3 “progressive,” “woke,” and “DEI” viewpoints.

4 6. The discriminatory campaign culminated on February 27, 2025, when the Anti-
5 LGBTQ Board Members approved a reduction in force (“RIF”) that eliminated all nine Teacher
6 Librarian positions—dismantling the entire librarian program. This action was not driven by
7 budgetary necessity. GUHSD held more than \$100 million in reserves, including over \$46 million
8 available for emergencies. At the same time it claimed fiscal crisis, the Board created new, high-
9 paying administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.

10 7. The elimination of Plaintiffs’ positions was pretextual, discriminatory, and retaliatory
11 and was intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
12 were involuntarily reassigned to classroom teaching positions, resulting in substantial pay cuts, loss
13 of professional status, and a hostile work environment that continues to this day.

14 8. This case is not an isolated incident. The targeting of the Librarians follows a
15 documented pattern of discrimination at GUHSD, including the constructive discharge of former
16 Director of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
17 Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students. The
18 cumulative effect of GUHSD’s hostile work environment has harmed not only these nine Librarians
19 but the entire school community. Students have lost access to credentialed library professionals who
20 provided research instruction, information literacy training, and safe spaces for learning. Teachers
21 have lost collaborative partners in curriculum development. The LGBTQ community has been sent
22 a clear message: you are not welcome here. This case matters not only for the individual Librarians
23 whose careers and livelihoods have been destroyed, but for every public employee in California
24 who dares to advocate for equality, oppose discrimination, or defend the constitutional and statutory
25 rights of students and staff in our public schools.

26 9. To redress the harms suffered, Plaintiffs bring this action asserting twelve causes of
27 action: (1) discrimination based on sexual orientation, gender expression and gender identity in
28 violation of the Fair Employment and Housing Act (“FEHA”), Government Code §12940(a); (2)

1 discrimination in violation of Government Code §11135; (3) retaliation for reporting and opposing
 2 discrimination in violation of the FEHA, Government Code §12940(h); (4) harassment based on
 3 sexual orientation, gender expression and gender identity in violation of the FEHA, Government
 4 Code §12940(j); (5) failure to prevent discrimination, harassment and retaliation in violation of the
 5 FEHA, Government Code §12940(k); (6) whistleblower retaliation in violation of Labor Code
 6 §1102.5; (7) political discrimination in violation of Labor Code §§98.6(a), 1101, and 1102; (8)
 7 violation of free speech rights under the California Constitution (Article I, §2(a)); (9) unlawful serial
 8 meetings / private deliberation in violation of the Ralph M. Brown Act, Government Code §§54950
 9 *et seq.*; (10) declaratory relief under Code of Civil Procedure §1060; (11) injunctive relief; and (12)
 10 failure to maintain employment records in violation of Labor Code §§ 432 and 1198.5.

11 JURISDICTION AND VENUE

12 10. The Superior Court of the State of California has jurisdiction over this action
 13 pursuant to Article VI §10 of the California Constitution because this case is a cause not given by
 14 statute to other trial courts. Federal jurisdiction does not exist in this case because there is no federal
 15 question implicated and because there is not complete diversity of citizenship.

16 11. This Court has personal jurisdiction over Defendants because Defendants do
 17 business in, and conduct a substantial amount of business within, the State of California. During the
 18 relevant period, Defendants did sufficient business in, had sufficient contacts with, and intentionally
 19 availed themselves of the laws and markets of California through the operation of GUHSD, as to
 20 render exercise of jurisdiction by California courts permissible. The violations of law described
 21 hereinafter were carried out within the County of San Diego, State of California.

22 12. Venue is proper in the County of San Diego in accordance with Code of Civil
 23 Procedure §§395 and 395.5 because Defendants hired Plaintiffs to work in this County, and many
 24 of the acts and practices giving rise to Plaintiffs' claims occurred in this County.

25 THE PARTIES

26 Plaintiffs

27 13. Plaintiff THEA BACHMANN ("Plaintiff Bachmann") is a natural person residing in
 28 California. Ms. Bachmann has been employed by GUHSD from on or about 2015 through the

1 present, serving as a Teacher Librarian at Santana High School from 2024 through June 2025.
2 Effective August 2025, Plaintiff Bachmann was involuntarily demoted and reassigned to a
3 classroom teaching position teaching English. At all relevant times, Plaintiff Bachmann was a
4 certificated public school employee within the meaning of the Educational Employment Relations
5 Act (“EERA”), Government Code §3540.1(j), and a member of the teachers’ union, Grossmont
6 Education Association (“GEA”). Plaintiff Bachmann is a member of a protected class within the
7 meaning of FEHA because of her political activity, association with LGBTQ individuals, and her
8 protected activity in support of LGBTQ students and staff.

9 14. Plaintiff JASON BALISTRERI (“Plaintiff Balistreri”) is a natural person residing in
10 California. Mr. Balistreri has been employed by GUHSD from on or about 2014 through the present,
11 serving as a Teacher Librarian at Mount Miguel High School from in or around 2021 through June
12 2025. Effective August 2025, Plaintiff Balistreri was involuntarily demoted and reassigned to a
13 classroom teaching position teaching social science. At all relevant times, Plaintiff Balistreri was a
14 certificated public school employee within the meaning of EERA and a GEA union member.
15 Plaintiff Balistreri was elected to serve as GEA Board Member at Large in April 2025. Plaintiff
16 Balistreri is a member of a protected class within the meaning of FEHA because of his political
17 activity, his association with LGBTQ individuals, and his protected activity in support of LGBTQ
18 students and staff.

19 15. Plaintiff JODIE BOEGER (“Plaintiff Boeger”) is a natural person residing in
20 California. Ms. Boeger has been employed by GUHSD from on or about 2011 through the present,
21 serving as a Teacher Librarian at Grossmont High School from on or around 2011 through June
22 2025. Effective August 2025, Plaintiff Boeger was involuntarily demoted and reassigned to a
23 classroom teaching position teaching English. At all relevant times, Plaintiff Boeger was a
24 certificated public school employee within the meaning of EERA and a GEA union member.
25 Plaintiff Boeger is a member of a protected class within the meaning of FEHA because of her
26 political activity, association with LGBTQ individuals, and her protected activity in support of
27 LGBTQ students and staff. Plaintiff Boeger is also a member of the LGBTQ community.

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1 16. Plaintiff TANIA JACKSON (“Plaintiff Jackson”) is a natural person residing in
2 California. Plaintiff Jackson has been employed by GUHSD from on or about August 2007 through
3 the present, serving as a Teacher Librarian at El Cajon Valley High School from in or around 2021
4 through June 2025. Effective August 2025, Plaintiff Jackson was involuntarily demoted and
5 reassigned to a classroom position teaching English and Academic Language Development
6 (“ALD”). At all relevant times, Plaintiff Jackson was a certificated public school employee within
7 the meaning of EERA and a union member of GEA. Plaintiff Jackson is a member of a protected
8 class within the meaning of FEHA because of her political activity, association with LGBTQ
9 individuals, and her protected activity in support of LGBTQ students and staff.

10 17. Plaintiff STEPHANIE MACCECA (“Plaintiff Macceca”) is a natural person residing
11 in California. Ms. Macceca has been employed by GUHSD from on or about 2006 through the
12 present, serving as a Teacher Librarian at Valhalla High School from in or around 2014 through June
13 2025. Effective August 2025, Plaintiff Macceca was involuntarily demoted and reassigned to a
14 classroom teaching position as an English Language Development (“ELD”)/ALD teacher and
15 English Learner Coordinator. At all relevant times, Plaintiff Macceca was a certificated public
16 school employee within the meaning of EERA and a union member of GEA. Plaintiff Macceca
17 served as an elected GEA Site Representative from 2020 to 2024 and was elected GEA Vice
18 President in April 2024. Plaintiff Macceca is a member of a protected class within the meaning of
19 FEHA because of her political activity, her association with LGBTQ individuals, and her protected
20 activity in support of LGBTQ students and staff.

21 18. Plaintiff CHANSAMONE O’MEARA (“Plaintiff O’Meara”) is a natural person
22 residing in California. Ms. O’Meara has been employed by GUHSD from on or about 2003 through
23 the present, serving as a Teacher Librarian at El Capitan High School from in or around 2014 through
24 June 2025. Effective August 2025, Plaintiff O’Meara was involuntarily demoted and reassigned to
25 a classroom teaching position teaching history. At all relevant times, Plaintiff O’Meara was a
26 certificated public school employee within the meaning of EERA and a union member of GEA.
27 Plaintiff O’Meara is a member of a protected class within the meaning of FEHA because of her
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1 political activity, her association with LGBTQ individuals, and her protected activity in support of
2 LGBTQ students and staff.

3 19. Plaintiff NICOLE SABELL-STOLTZ (“Plaintiff SaBell-Stoltz”) is a natural person
4 residing in California. Ms. SaBell-Stoltz has been employed by GUHSD from on or about August
5 2006 through the present, serving as a Teacher Librarian at Monte Vista High School from 2014
6 through June 2025. Effective August 2025, Plaintiff SaBell-Stoltz was involuntarily demoted and
7 reassigned to a classroom teaching position as an ELD/ALD teacher. At all relevant times, Plaintiff
8 SaBell-Stoltz was a certificated public school employee within the meaning of EERA and a union
9 member of GEA. Plaintiff SaBell-Stoltz is a member of a protected class within the meaning of
10 FEHA because of her political activity, association with LGBTQ individuals, her sexual orientation
11 as a member of the LGBTQ community, and her protected activity in support of LGBTQ students
12 and staff. Plaintiff SaBell-Stoltz is also a member of the LGBTQ community.

13 20. Plaintiff SUZANNE SANNWALD (“Plaintiff Sannwald”) is a natural person
14 residing in California. Plaintiff Sannwald has been employed by GUHSD from about 2002 to 2012
15 and 2014 through the present, serving as a Teacher Librarian at West Hills High School from in or
16 around 2014 through June 2025. Effective August 2025, Plaintiff Sannwald was involuntarily
17 demoted and reassigned to a classroom teaching position teaching mathematics. At all relevant
18 times, Plaintiff Sannwald was a certificated public school employee within the meaning of EERA
19 and a member of GEA. Plaintiff Sannwald served as an elected GEA Site Representative beginning
20 in or about April 2024. Plaintiff Sannwald is a member of a protected class within the meaning of
21 FEHA because of her political activity, her association with LGBTQ individuals, and her protected
22 activity in support of LGBTQ students and staff.

23 21. Plaintiff ANGELA SCOTT (“Plaintiff Scott”) is a natural person residing in
24 California. Plaintiff Scott has been employed by GUHSD from in or about March 1997 through the
25 present, serving as a Teacher Librarian at Granite Hills High School from in or around 2021 through
26 June 2025. Effective August 2025, Plaintiff Scott was involuntarily demoted and reassigned to a
27 classroom teaching position teaching English. At all relevant times, Plaintiff Scott was a certificated
28 public school employee within the meaning of EERA and union member of GEA. Plaintiff Scott

1 served as an elected GEA Site Representative from 2014 to 2016 and from 2022 to 2024. Plaintiff
2 Scott is a member of a protected class within the meaning of FEHA because of her political activity,
3 her association with LGBTQ individuals, and her protected activity in support of LGBTQ students
4 and staff.

5 **Defendants**

6 22. Defendant GUHSD is a “public school employer” within the meaning of the EERA,
7 Government Code §3540.1(k), with its principal place of business at 1100 Murray Drive, El Cajon,
8 California, 92020. GUHSD receives funds directly by the state, and/or receives financial assistance
9 from the state. GUHSD is subject to Title 2 of the Education Code §§33000-650001. During the
10 relevant period, GUHSD was an “employer” of Plaintiffs within the meaning of the FEHA,
11 Government Code §12926(d) (employer includes “the state or any political or civil subdivision of
12 the state, and cities”). At relevant times, GUHSD had an agreement with GEA for the certificated
13 bargaining unit as certified by the Educational Employment Relations Board (the “GEA Bargaining
14 Unit”). The President of GEA was James Messina. GEA acted as the representative of the
15 certificated employees of GUHSD within the meaning of EERA, Government Code §3540.1(e).

16 23. Defendant GUHSD Board is a “public school employer” or “employer” within the
17 meaning of EERA, Government Code §3540.1(k), and the FEHA. Every school district shall be
18 “under the control of a board of school trustees or a board of education,” and the “governing board
19 of each school district shall prescribe and enforce rules *not inconsistent with the law.*” Cal. Educ.
20 Code §35010(a), (b) (emphasis added). Further, the governing board of any “school district may
21 initiate or carry on any program, activity, or may otherwise act in any manner *which is not in conflict*
22 *with or inconsistent with*, or preempted by, *any law* and which is not in conflict with the purposes
23 for which school districts are established.” Educ. Code §35160 (emphasis added); *see also* Educ.
24 Code §§35160.1, 35161, 35166. The “governing board may sue and be sued.” Educ. Code §35162;
25 *see Essah v. Governing Bd. of the L.A. Unified Sch. Dist.*, No. EDCV 20-2628-FWS (AGR), 2023
26 U.S. Dist. LEXIS 114461, at *8-9 (C.D. Cal. Feb. 23, 2023) (holding “California law makes clear
27 that the Board is the District for the purposes of litigation.”) (citation omitted).

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1 24. From in or around 2016 through 2023, the GUHSD Board consisted of the following
2 members: (1) Dr. Gary Woods (President, Area 3 Trustee); (2) Robert Shield (Vice President, Area
3 4 Trustee); (3) Jim Kelly (Member, Area 5 Trustee); (4) Chris Fite (Member, Area 1 Trustee); and
4 (5) Elva Salinas (Member, Area 2 Trustee). Beginning in 2024 and continuing to the present, Scott
5 Eckert (Clerk, Area 2 Trustee) replaced Elva Salinas as the Area 2 Trustee.

6 25. The GUHSD Board members were “supervisors” of Plaintiffs within the meaning of
7 the FEHA, Government Code §12926(t), because they had the authority, in the interest of GUHSD
8 and the GUHSD Board, to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward,
9 or discipline Plaintiffs or the responsibility to direct them, or to adjust their grievances, or effectively
10 to recommend that action. In connection with the foregoing, the exercise of that authority was not
11 of a merely routine or clerical nature, but required the use of independent judgment. The Anti-
12 LGBTQ Board Members were responsible for taking harassing, discriminatory, and retaliatory
13 adverse employment actions against Plaintiffs.

14 26. Defendants engaged in the acts alleged herein and/or condoned, permitted,
15 authorized, and/or ratified the conduct of their employees, subcontractors, and agents, and are
16 vicariously liable for the wrongful conduct of their employees, subcontractors, and agents alleged
17 herein.

18 27. Plaintiffs do not know the true names and capacities of defendants DOES 1 through
19 25, inclusive, and therefore sue them by these fictitious names. Plaintiffs will amend this Complaint
20 to include their names and capacities once they are known. Plaintiffs are informed and believe, and
21 on that basis allege, that each of the defendants designated as a DOE is legally responsible in some
22 manner for the occurrences alleged in this Complaint, and unlawfully caused the injuries and
23 damages to Plaintiffs as alleged in this Complaint.

24 28. Plaintiffs are informed and believe, and thereon allege, that each defendant is, and at
25 all times mentioned was, the agent, employee, or representative of each other defendant. Each
26 defendant, in doing the acts, or in omitting to act as alleged in this Complaint, were subsequently
27 ratified and adopted by each other defendant as principal.

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EXHAUSTION OF REMEDIES

29. On March 9, 2026, Plaintiffs filed a charge of discrimination with the California Civil Rights Department (“CRD”) against GUHSD and the GUHSD Board. That same day, the CRD closed Plaintiffs’ cases against GUHSD and the GUHSD Board and issued Right-to-Sue letters. *See* Exhibit 1 attached hereto. Therefore, Plaintiffs have exhausted their administrative remedies.

30. On November 14, 2025, Plaintiffs filed their claims against GUHSD and the GUHSD Board in compliance with the requirements of the California Government Claims Act (Government Code §§810-996.6). GUHSD and the GUHSD Board were given more than 45 days to review Plaintiffs’ claims and take action. On or around December 12, 2025, GUHSD and the GUHSD Board rejected Plaintiffs’ claims. As such, Plaintiffs exhausted any administrative duties under the California Government Claims Act, entitling them to pursue all their claims in Court.

FACTS COMMON TO ALL CAUSES OF ACTION

California’s Anti-Discrimination Laws and GUHSD’s Affirmative Duty to Provide an Educational Environment Free from Discrimination

31. GUHSD is a public school district in eastern San Diego County, California, serving high school, adult school, and regional occupational programs to students in the cities of El Cajon, Lemon Grove, La Mesa, and Santee, as well as several unincorporated communities (including Alpine, Casa de Oro, Crest, Lakeside, Rancho San Diego, and Spring Valley). GUHSD operates thirteen high schools, nine of which are standard, full-program public high schools (“comprehensive high schools”). With more than 2,300 employees plus hundreds of hourly and contract staff, GUHSD is the largest employer in eastern San Diego County, serving over 16,000 students across 470 square miles.

32. California law establishes a clear and unequivocal mandate for equity in public education. “It is the policy of the State of California to afford all persons in public schools, ***regardless of their . . . gender identity, gender expression, . . . religion, [and/or] sexual orientation*** . . . equal rights and opportunities in the educational institutions of the state.” Educ. Code §200 (emphasis added); *see also* Educ. Code §§220, 234.1; 5 Cal. Code Regs. §4900. California’s public schools therefore have an affirmative obligation to combat racism, sexism, and other forms of bias,

1 and a corresponding responsibility to provide equal educational opportunity to all students. Educ.
2 Code §201(b); *see also* Educ. Code §202(c).

3 33. Consistent with these mandates, “*California schools must create an equitable*
4 *learning environment where all pupils, including lesbian, gay, bisexual, transgender, queer, and*
5 *questioning (LGBTQ) pupils . . . feel welcome, including through . . . the diversity of gender and*
6 *sexual orientation that reflects the lived reality of those pupils.*” Educ. Code §202(c) (emphasis
7 added); *see also* Educ. Code §220 (“No person shall be subjected to discrimination on the basis of
8 . . . gender identity, gender expression, [or] sexual orientation . . . in any program or activity
9 conducted by an educational institution that receives, or benefits from, state financial assistance, or
10 enrolls pupils who receive state student financial aid.”); Educ. Code §234(b); Cal. Const. Art. I,
11 §28(a)(7).

12 34. In addition to providing supportive school-site resources for LGBTQ students,
13 California school districts are required to ensure access to local “physical and mental health
14 providers with experience in treating and supporting LGBTQ youth.” Educ. Code §218(c)(2)(B).
15 Any “*efforts to categorically exclude topics related to . . . sexual orientation, or other protected*
16 *characteristics . . . from . . . curricula . . . constitute censorship that violates California law and*
17 *policy.*” Educ. Code §202(e) (emphasis added).

18 35. *The FAIR Education Act requires that curricula and instructional materials*
19 *include the contributions and history of LGBTQ individuals and prohibits negative or adverse*
20 *portrayals.* Educ. Code §§51204.5, 51500, 51501, 60040, 60044. Consistent with these protections,
21 “[t]he governing board of a school district . . . shall not refuse to approve or prohibit the use of any
22 textbook, instructional material, supplemental instructional material, or other curriculum for
23 classroom instruction or any book or other resource in a school library on the basis that it includes
24 a study of the role and contributions of any . . . minority individual or group,” including LGBTQ
25 individuals. Educ. Code §243.

26 36. The “Superintendent and other state officials and agencies have the authority to
27 enforce federal and state laws that protect pupils from unlawful discrimination . . . and that require
28 local education agencies *to create an equitable learning environment for all pupils, regardless of*

1 . . . *sexual orientation*.” Educ. Code §202(f) (emphasis added). “This authority includes the power
2 to ensure that local educational agencies comply with laws supporting pupils’ right to receive
3 accurate and inclusive education in California’s schools.” *Id.*

4 37. Beyond the District’s obligations set out above, California law protects school
5 employees from discrimination and retaliation in their workplace. The FEHA makes it unlawful for
6 an employer to discriminate against or harass any employee based on sexual orientation, gender
7 expression and gender identity, among other protected characteristics. Gov’t Code §12940(a), (j).
8 Public school employees also enjoy free speech protections under the California Constitution, which
9 provides that “[e]very person may freely speak, write and publish his or her sentiments on all
10 subjects, being responsible for the abuse of this right.” Cal. Const. Art. I, §2(a). School board
11 officials may not promise benefits or threaten punishment to influence an employee’s political views
12 or activities, nor may they prohibit employees from engaging in political activity. Educ. Code §7055.
13 These constitutional protections extend to public employees’ speech on matters of public concern,
14 including support for LGBTQ students and staff and opposition to discriminatory practices in public
15 education.

16 38. Taken together, these legal frameworks ensure that school staff who advocate for
17 inclusive education, openly identify as LGBTQ, or oppose discriminatory practices are protected
18 from adverse employment actions based on their protected characteristics, beliefs, or speech
19 activities.

20 39. As detailed below, GUHSD failed to meet these legal obligations. Through these
21 actions and omissions detailed below, GUHSD and the Anti-LGBTQ Board Members violated
22 California’s anti-discrimination laws and their affirmative duties to foster safe, inclusive, and
23 equitable educational environments.

24 ***The Anti-LGBTQ Board Members, Their Co-Conspirators, and Their***
25 ***Rise to Power over GUHSD***

26 40. GUHSD is overseen by a five-member governing board. Board members are elected
27 by community vote and serve four-year terms. They can be reelected, and there are no term limits.
28 The day-to-day operations are to be run by the Superintendent, who is appointed by the board. While

1 California’s Education Code provides the Superintendent shall be “the chief executive officer of the
2 governing board of the school district” (Educ. Code §35035(a); *see also* Educ. Code §§35124,
3 35160.1(b)), for the last several years, the majority board members of GUHSD have acted as a four-
4 person dictatorship without regard to the Superintendent or public opinion.

5 41. Since 2024, the five-member GUHSD Board has consisted of: (1) Dr. Gary Woods;
6 (2) Jim Kelly; (3) Robert Shield; (4) Scott Eckert; and (5) Chris Fite. Four of these board members—
7 Dr. Woods, Mr. Kelly, Mr. Shield, and Mr. Eckert—constitute the “Anti-LGBTQ Board Members”
8 referenced throughout this Complaint. These four white males with strongly-held Christian and anti-
9 diversity beliefs have openly advocated for “East County Values,” which they have unequivocally
10 defined as being anti-LGBTQ and “anti-woke.”

11 **ANTI-LGBTQ MAJORITY BOARD MEMBERS**

12 **Gary Woods**

12 **Robert Shield**

12 **Jim Kelly**

12 **Scott Eckert**



19
20 42. Board Member Dr. Gary Woods was the President of the GUHSD Board during the
21 relevant period through 2025. He is outspokenly anti-LGBTQ, is the Executive Director of Equip
22 Biblical Institute, which provides so-called “leadership development” in biblical studies based out
23 of El Cajon, California, and is affiliated with the Shadow Mountain Community Church, a Baptist
24 megachurch located in El Cajon. Shadow Mountain Church is also affiliated with Christian Unified
25 Schools, a private religious school network. Dr. Woods has published several documents with the
26 Equip Biblical Institute where he has made clear he rejects secular education and science-based
27 academia in favor of extreme religious doctrine.

28

1 43. In his published writings, Dr. Woods states that all Christians like him are “under
2 obligation” to make the “will of Christ supreme” not only in “our own lives” but in all “human
3 society” and must oppose “*all forms of sexual immorality*” including “*homosexuality*.” Dr. Woods
4 explicitly declares that “*Marriage is the uniting of one man and one woman*” and that “a wife is
5 to submit herself graciously to the servant leadership of her husband even as the church willingly
6 submits to the headship of Christ.” Dr. Woods has also written disparagingly about atheists,
7 Muslims, women, and others, stating that Muslims force “their beliefs on others” and he suggests
8 they are “violent.” He has also published so-called “Logical-Mathematical Formulas for Students
9 and Teachers,” wherein he ascribes “*atheism*” as equaling “*delusion*,” “*purposeless*,” and
10 “*valueless*.” According to his formula: “*Marriage = Man + Wife*.”

11 44. Board Member Jim Kelly, who is anti-LGBTQ, is a member of the Skyline Church,
12 which is an evangelical Christian megachurch known for its leading role in organizing conservative
13 religious groups to support California Proposition 8, which banned same-sex marriage in California
14 before the Supreme Court’s holding in *Obergefell v. Hodges*, 576 U.S. 644 (2015). Indeed, on motion
15 by Mr. Kelly, the GUHSD Board endorsed Proposition 8 to add to the California State Constitution
16 a provision that reads: “*Only marriage between a man and woman is valid or recognized in*
17 *California*.” In supporting Proposition 8, Mr. Kelly stated: “*we need family-friendly schools*.” He
18 then compared gay couples to animals, stating: “*If same-sex marriage is allowed, then once you*
19 *start that game, why is it two people? Why can’t it be more people? Why can’t it be animals? You*
20 *destroy the institution*.” Mr. Kelly openly opined that if gay marriage was allowed, then “state
21 curriculum[s] are certain to follow” where children could learn about such rights.

22 45. Board Member Robert Shield is the current Board President, serving since January
23 2026. He is also outspokenly anti-LGBTQ, has affiliations with Foothills Christian High School, a
24 private religious institution. Like Mr. Kelly, Mr. Shield endorsed Proposition 8 and joined a federal
25 lawsuit challenging an anti-discrimination bill applicable to public schools signed into law by
26 California’s Governor in October 2007, actively working with conservative groups to overturn anti-
27 discrimination laws aimed at protecting LGBTQ individuals.

28

1 46. To advance their anti-diversity agenda, the Anti-LGBTQ Board Members relied on
2 a “hired gun”: Dr. Woods’ close friend and personal attorney, John Wayne Howard. On information
3 and belief, Mr. Howard shares the same political and religious ties as Mr. Kelly.⁵

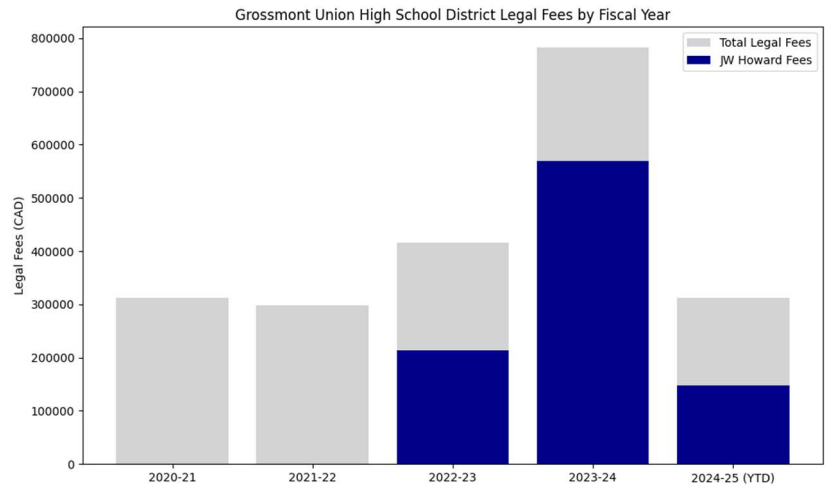
4 47. With Mr. Howard’s assistance, Mr. Kelly, Mr. Shield, and Dr. Woods formed a
5 campaign committee for the 2022 GUHSD general election entitled Kelly, Shields, Woods for
6 Grossmont Union High School District 2022 (the “*Kelly, Shield, Woods Campaign*”). In October
7 2022, Mr. Howard contributed at least \$2,000 to that campaign.

8 48. Immediately after the trio was re-elected on November 4, 2022, the Anti-LGBTQ
9 Board Members voted to award Mr. Howard a lucrative contract authorizing him to conduct
10 “*confidential independent*” investigations “*at any time and for any reason*” at GUHSD between
11 December 14, 2022, and June 30, 2023. Mr. Howard does not specialize in education law, and the
12 contract was awarded without any competitive bidding process. Rather, as discussed below, the Anti-
13 LGBTQ Board Members vested Mr. Howard with unbridled authority to launch discriminatory and
14 retaliatory witch hunts labeled “confidential independent” investigations to purge GUHSD of
15 employees who opposed the board majority’s anti-LGBTQ agenda.

16 49. In fiscal year 2023–2024 alone (July 1, 2023 – June 30, 2024), GUHSD paid Mr.
17 Howard \$569,137 in legal fees for so-called “Employee Investigations” – by far *the largest*
18 *expenditure of legal fees in GUHSD’s history*. Indeed, fees paid to Mr. Howard alone exceeded the
19 fees for thirteen other categories *combined* (including fees for Student Matters, Special Education
20 General, Restraining Orders, Real Estate, Public Records Requests, Misc. General Legal
21 Matters/Brown Act, Employee Layoffs, Employee Discipline/Employee Matters,
22 Construction/Bond/Facilities/Measure U/BB, Collective Bargaining, Charter Schools, and Board
23 Meetings Support).

24 _____
25 ⁵ Mr. Howard, through his law firm JW Howard Attorneys, serially files lawsuits supporting
26 his “anti-woke,” far right-wing agenda, including by (1) representing a white male challenging
27 hiring practices by a business that hires diverse employees such as LGBTQ individuals, (2)
28 representing plaintiffs in a lawsuit brought by Donald Trump against Twitter relating to censorship
of Mr. Trump, and (3) filing several cases promoting his anti-Covid vaccination and anti-masking
views.

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50. On July 20, 2023, the Anti-LGBTQ Board Members approved an extension of Mr. Howard’s contract for fiscal year 2023–2024, and again on June 30, 2024, for fiscal year 2024–2025, each time renewing the same terms and rates. Through 2024, GUHSD paid Mr. Howard more than \$732,000 in legal fees for his “investigation” work to carry out the Board’s anti-LGBTQ agenda.

51. During these so-called “Employee Investigations,” Mr. Howard was assisted by his then-paralegal, Jerry Hobbs, who was paid \$200 per hour by the District. Mr. Hobbs is a former GUHSD teacher who resigned from GUHSD in 2018 pending disciplinary proceedings for “persistently engaging in threatening, intimidating and aggressive behavior toward numerous employees; persistently using *racist* and *sexist* slurs; persistently making *racist, sexist, and grossly inappropriate comments on campus*; and, *subjecting employees and students to an intimidating, threatening, hostile and/or offensive work and educational environment.*” Some of the many racial and sexist slurs and comments cited in the Statement of Charges filed against Mr. Hobbs include *the N-word*; “*Now that Trump is President, I’m going to send you back to Africa*”; and “*Women belong in the kitchen, barefoot and pregnant.*” The Anti-LGBTQ Board Members’ decision to entrust these investigations to an individual with this documented history underscores the pretextual nature of the process and further evidences the discriminatory intent underlying the investigations themselves.

52. In addition to the conflicts of interest stated above, the *Kelly, Shield, Woods Campaign* engaged in fraudulent and deceptive campaign tactics in violation of the Levine Act,

1 Gov't Code §§84308 *et seq.* to maintain their board seats. For example, the *Kelly, Shield, Woods*
2 *Campaign* circulated pamphlets falsely portraying themselves as members of the Democratic Party
3 and advancing “progressive values.” The fraudulent campaign pamphlet was intended to deceive
4 Democrat voters to maintain their power. Of course, the *Kelly, Shield, Woods Campaign* was not
5 endorsed by the San Diego Democratic Party—it was endorsed by the Republican Party of San
6 Diego and received significant monetary campaign contributions from Political Action Committees
7 (“PACs”), groups, and individuals sharing their extreme conservative political and religious
8 ideologies, including “Citizens for a Better East County,” “Reform California,” and “Continuing the
9 Republican Revolution,” among other related groups.

10 53. Board Member Scott Eckert, the fourth member of the Anti-LGBTQ Board
11 Members, is affiliated with Heritage Christian School San Diego. He was elected to the GUHSD
12 Board in 2024 through these same—if not worse—deceptive tactics coordinated by the Anti-
13 LGBTQ Board Members and their co-conspirators. In a 2024 speech to community members
14 regarding his core mission as a school board member—later posted on social media—he stated that
15 “God directed me to run for the school board,” explaining that, in his view, “there is a big ideological
16 issue facing our kids, our community and our public schools.” He identified that issue as “gay pride,”
17 which he described as “coming for our kids,” and characterized it as a “battle that we have to fight.”

18 54. Specifically, on July 11, 2024, the Anti-LGBTQ Board Members unlawfully
19 deployed three “decoy” political candidates (Marsha Christman, Azure Chrisawn, and Debra
20 Harrington) who were not intended to win the school board election but used solely to draw votes
21 away from the Anti-LGBTQ Board Members’ progressive opposition candidates. These decoy
22 candidates had campaign statements, printed in official voter guides, that portrayed them as standing
23 for “progressive values” to appeal to Democratic voters—such as supporting use of pronouns,
24 promoting DEI, and creating a sanctuary for all students regardless of race, immigration status, or
25 sexual orientation. However, their real affiliations and social media presence reflected their true
26 values, which were anything but progressive. The decoy candidates did not pay for these deceptive
27 campaign statements—Mr. Howard secretly paid over \$3,000 for them; however, neither Mr.
28 Howard nor the decoy candidates lawfully reported Mr. Howard’s contributions.

1 55. The deception paid off. The decoy candidates collectively captured 34% of the vote,
 2 causing the true progressive candidate, Jay Steiger, to lose to Mr. Eckert. Worse, Mr. Howard
 3 contributed \$2,500 directly to Mr. Eckert’s campaign, and within seven months after receiving Mr.
 4 Howard’s contribution, Mr. Eckert officially voted along with Mr. Kelly to prolong Mr. Howard’s
 5 “Confidential Investigations” contract in blatant in violation of the Levine Act.⁶

6 56. In short, by using deceptive campaign practices, making illicit contributions, and
 7 awarding unlawful pay-to-play contracts in violation of the Levine Act, the Anti-LGBTQ Board
 8 Members have obtained and retained seats to carry out their unlawful discriminatory agenda —
 9 including their war waged against the Librarians.

10 ***The Anti-LGBTQ Board Members’ Discriminatory Animus and Ongoing***
 11 ***Campaign to Cleanse GUHSD of “Woke” Supporters***

12 57. After securing control of the GUHSD Board, the Anti-LGBTQ Majority Board
 13 Members launched a coordinated campaign to remove people, programs, and materials that did not
 14 conform to their discriminatory ideology. Their efforts targeted not only LGBTQ individuals, but
 15 also employees and programs they perceived as advancing an “LGBTQ and trans militant agenda”
 16 or being “woke.” This campaign fostered a hostile work environment that affected Plaintiffs and
 17 other employees who supported LGBTQ students and inclusive education.

18 58. Beginning in or around 2022, the District deliberately slowed the approval process
 19 for books recommended by Librarians and teachers for inclusion in GUHSD curricula and library
 20 collections. This slowdown was not accidental. It was orchestrated by the Anti-LGBTQ Board
 21 Members as part of a coordinated effort to block and ban books featuring diverse characters,
 22 inclusive themes, and LGBTQ-centered stories.

23 59. In 2023, GUHSD further entrenched this effort by intentionally refusing to adopt
 24 clear or transparent book-approval procedures, despite repeated attempts by the Librarians to

25 _____
 26 ⁶ See generally Kristen Taketa & Jemma Stephenson, ‘Ghost’ Candidates, Pay-to-Play
 27 Accusations: Grossmont School Board Critics Say Messages Suggest ‘Wildly Unethical’ Campaign
 28 Efforts, S.D. UNION TRIBUNE, July 6, 2025,
<https://www.sandiegouniontribune.com/2025/07/06/spoiler-candidates-pay-to-play-accusations-grossmont-school-board-critics-say-messages-suggest-wildly-unethical-campaign-efforts/>.

1 establish “Collection Management Guidelines.” Internal text messages later obtained through CPRA
2 requests revealed that Mr. Shield was actively working to develop a book-approval policy “*which*
3 *would make it impossible for ‘woke’ books to be adopted.*”

4 60. On July 20, 2023, at the direction of the Anti-LGBTQ Board Members, GUHSD
5 terminated its decades-long contract with San Diego Youth Services (“SDYS”), a nonprofit
6 organization that provided critical mental health services to District students. The stated reason for
7 the termination was that SDYS served LGBTQ students and supported gender identity-related
8 issues. During the Board meeting, Dr. Woods expressly stated that GUHSD needed mental health
9 providers aligned with “East County Values,” making clear that support for LGBTQ youth was
10 inconsistent with those values. Students and counselors testified at subsequent board meetings that
11 SDYS therapists had “literally saved” lives and that the abrupt termination left vulnerable LGBTQ
12 students without critical mental health support at the start of the school year. Community members
13 widely protested this decision at Board meetings on August 14 and August 30, 2023, but the Anti-
14 LGBTQ Board Members refused to reverse course.

15 61. Before the start of the 2023/2024 school year, GUHSD hosted its annual professional
16 development event, known as “Learning Launch,” for teachers. The event was scheduled to include
17 opening remarks, a keynote address, and more than twenty teacher- and administrator-led breakout
18 sessions. Two of the planned breakout sessions focused on LGBTQ inclusivity and were titled: (1)
19 “From Surviving to Thriving/Safe Is Not Enough – Creating an LGBTQ-Inclusive Classroom,” and
20 (2) “The LGBTQ+ Friendly Classroom.”

21 62. Just three days before the event, after the final schedule had been released, the
22 Superintendent abruptly placed the event “on hold” and informed staff that the two LGBTQ-related
23 sessions had to be removed. The Superintendent explained that Mr. Kelly and Dr. Woods were likely
24 to attend the event, and that Mr. Shield “was with the other two” on LGBTQ issues, stating that
25 “there is no openness to exploring these topics at GUHSD.” Rather than allowing the LGBTQ-
26 focused sessions to proceed, GUHSD cancelled all breakout sessions for the entire event.

27 63. In November 2022, a student broke into a classroom at Granite Hills High School,
28 stole a PRIDE flag, and burned it. GUHSD leadership initially expelled the student and

1 characterized the incident as a hate crime. However, the Anti-LGBTQ Board Members later
2 intervened, reopened the matter, and removed the “hate crime” designation, signaling that anti-
3 LGBTQ conduct would be tolerated.

4 64. On information and belief, the Anti-LGBTQ Majority Board also systematically
5 interfered with hiring decisions to block candidates they perceived as LGBTQ or “woke.” Board
6 Members inserted themselves into interview processes and flagged candidates as “too woke” to
7 advance.

8 65. On information and belief, Dr. Woods personally visited school campuses and
9 questioned principals about whether they had an “LGBTQ agenda,” creating a climate of fear and
10 surveillance. One such principal was targeted and harassed by Dr. Woods on this basis and was
11 ultimately forced out of her position following Board pressure.

12 66. In or around September 2023, GUHSD abruptly halted plans for a Resource Center
13 at Granite Hills High School that was intended to provide student support services. The project was
14 stopped without explanation after Board inquiries regarding LGBTQ-related programming.

15 67. The Board’s targeting of LGBTQ employees and allies is further documented
16 through related litigation. Rose Tagnesi, GUHSD’s Director of Special Education, openly identified
17 as a member of the LGBTQ community. After over thirty years of exemplary service in the District,
18 the Anti-LGBTQ Board Members launched a pretextual investigation against Ms. Tagnesi, led by
19 Mr. Howard and Mr. Hobbs, for unspecified reasons in mid-2023. On August 17, 2023, she was
20 placed on forced administrative leave, required to clear out her office, and escorted off GUHSD
21 property. In February 2024, the Board voted to demote Ms. Tagnesi based on a purported “loss of
22 confidence in her ability to function effectively” as the Director of Special Education, without
23 disclosing any alleged reason for the so-called “loss in confidence.” She was ultimately forced out
24 of the District and filed a civil action alleging discrimination and retaliation based on sexual
25 orientation. *See Tagnesi v. Grossmont Union High School District, et al.*, No. 24CU006064C, San
26 Diego Superior Court.

27 68. On March 12, 2024, the District proposed to lay off all GUHSD Instructional
28 Technology employees and other employees in the Educational Services department (collectively

1 “Ed Services”)—positions that championed diversity, equity, and inclusion initiatives. On
2 information and belief, Ed Services was unique within GUHSD in that District policy required
3 certain staffing decisions, including hiring and termination decisions, to originate within that
4 department, thereby vesting it with significant authority over personnel matters. The Anti-LGBTQ
5 Board Members claimed the decision was due to financial necessity.

6 69. In October 2024, the Anti-LGBTQ Board Members, specifically Dr. Woods, sought
7 to replace secular, state-approved curricula with Christian-aligned materials that reflected their
8 religious ideology. Internal text messages revealed Dr. Woods planned to freeze all library funding
9 and instead purchase the conservative Hillsdale College curriculum and Liberty University home-
10 schooling curriculum, which is Bible-based.

11 70. In December 2024, despite Mr. Hobbs’ documented history of racist and sexist
12 conduct, the Anti-LGBTQ Board Members voted to approve a settlement agreement that cleared
13 Mr. Hobbs’ disciplinary record and made him eligible for rehire at GUHSD. Internal emails later
14 revealed that Mr. Hobbs had drafted his own settlement agreement and inserted unauthorized
15 language granting himself tenure while turning off track changes to conceal the insertion.

16 71. In January 2025, the Anti-LGBTQ Board Members officially hired Mr. Hobbs as
17 Director I, Student and Family Engagement and Learning effective January 17, 2025, and then
18 immediately promoted him on February 6, 2025, to Chief of Staff with a salary of approximately
19 \$187,000 per year—all without public job postings or a competitive hiring process. The position
20 was created specifically for Mr. Hobbs.⁷

21 72. In or around spring of 2025, Mr. Hobbs proposed replacing GUHSD’s secular, state-
22 sanctioned ethnic studies curriculum. Mr. Hobbs even went so far as to prepare talking points and a
23 script for Dr. Woods to use at the board meeting to push for the replacement curriculum. In internal
24

25 ⁷ After Mr. Hobbs’ settlement manipulation and hiring scheme were exposed by media
26 reporting in May 2025, he was forced to resign but still received a \$186,878.75 settlement payout.
27 *See, e.g.,* Kristen Taketa & Jemma Stephenson, *Years Before Grossmont Hired Him as a Top*
28 *Administrator, He Was Disciplined for Racial Slurs, Sexism*, S.D. UNION TRIBUNE, May 13, 2025,
<https://www.sandiegouniontribune.com/2025/05/13/years-before-grossmont-hired-him-as-a-top-administrator-he-was-disciplined-for-racial-slurs-sexism/>.

1 text messages, Dr. Woods stated he would be using the curriculum adoption process as an
2 opportunity to test administrators’ “loyalty” to the Board’s ideological agenda. The Anti-LGBTQ
3 Board’s actions are directly contrary to the express mandate that the “opportunity to receive
4 schooling furnished by the state must be made available to all on an equal basis” and the trustees’
5 decisions must consider community input and adherence to the laws. *Butt v. California*, 4 Cal. 4th
6 668, 680-81 (1992); Educ. Code §§35145.5, 35160, 35160.1, 52062.

7 73. This documented pattern of discrimination, retaliation, and coordinated targeting of
8 LGBTQ employees and allies created the hostile environment in which the Librarians worked. Their
9 experience was not isolated, but part of a broader, systematic campaign—reflected in multiple
10 lawsuits, public records, and media coverage—showing deliberate coordination between the Anti-
11 LGBTQ Board Members, Mr. Howard, and Mr. Hobbs to purge GUHSD of staff who did not
12 conform to their discriminatory “East County Values.”

13 ***The Librarians Have Long Been Visible Allies for LGBTQ Students***

14 74. GUHSD employed nine credentialed Teacher Librarians—stationed at each of the
15 nine comprehensive high schools within the District. From the outset of their employment, the
16 Librarians established themselves as trusted allies and transformed their school libraries into safe,
17 inclusive spaces for all students, including LGBTQ students.

18 75. Teacher Librarians are educational leaders responsible for managing comprehensive
19 library programs that extend far beyond book circulation. Their duties and responsibilities include,
20 but are not limited to, the following:

- 21 • Teaching students effective research methods, including source evaluation, database use,
22 digital literacy, and responsible technology use.
- 23 • Planning and delivering library orientations, research lessons, and information-literacy
24 presentations for classes and individual students, and developing instructional materials such
25 as screencasts and digital research guides.
- 26 • Supervising, training, and managing student aides and library staff.
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- Managing sitewide Chromebook programs, including device deployment, troubleshooting, repairs, loaner programs, and reissuance, and providing ongoing technology support for students and faculty, including operation of computer lab spaces.
- Curating and managing diverse print and digital library collections aligned with curricular needs and student interests, including selecting, ordering, cataloging, genrefying, labeling, and financially tracking all library materials and resources.
- Managing all circulation functions, including checkouts, returns, renewals, and overdue materials, as well as conducting regular inventory and systematic weeding of outdated or damaged materials.
- Designing and implementing reading promotions, library programming, and displays that foster literacy, inclusion, and lifelong learning.
- Collaborating with classroom teachers across subject areas to integrate research, information literacy, and critical thinking skills into curriculum, including curating and providing instructional resources and research materials for classroom use.
- Managing annual library budgets of approximately \$15,000 per site, including grant funds.
- Planning and hosting educational programs and events, including reading initiatives, author visits, book festivals and community partnerships, and operating clubs, lunchtime activities, and maker spaces.
- Participating in professional development, staff meetings, and district committees, and serving in leadership and administrative roles, including department chair responsibilities, compliance duties, tutoring supervision, and extracurricular coaching.

76. Each Librarian held specialized professional qualifications required by California law, including a valid California teaching credential and a Teacher Librarian Services Credential (“CL-562”) issued by the California Commission on Teacher Credentialing. This credential requires

1 completion of at least 30 graduate-level semester units from a Commission-approved program,
2 encompassing instructional design, collection development, information organization, leadership
3 and advocacy, and diversity and equity. Program standards for the CL-562 expressly require
4 demonstrated competence in fostering equity, intellectual freedom, inclusive learning environments,
5 and advocacy—obligations that include providing affirming resources for LGBTQ students and
6 ensuring that every student feels valued and supported. Many of the Librarians also earned Master
7 of Library and Information Science (MLIS) degrees, investing significant personal time and
8 financial resources to obtain advanced expertise.

9 77. Plaintiffs’ libraries were not simply passive book repositories. Rather, with deep
10 commitment, Plaintiffs created dynamic learning hubs and sanctuaries essential to students’
11 academic success, personal growth, and emotional well-being. They consistently regarded their
12 most important responsibility as creating welcoming environments where all students—particularly
13 those from marginalized communities—could see themselves reflected in literature and receive
14 individualized support. To that end, the Librarians displayed rainbow PRIDE flags, posted “*All Are*
15 *Welcome Here*” and “*Safe Zone*” signage in their libraries, and wore “*I’m Here*” ally badges. These
16 visible symbols sent a clear message to LGBTQ students that the GUHSD libraries were inclusive
17 spaces where they would be respected, supported, and safe.

18 78. The Librarians selected and requested approval for diverse and inclusive reading
19 materials, including books featuring LGBTQ themes, characters, and experiences, as well as books
20 reflecting diverse racial, ethnic, and cultural perspectives. The Librarians created library displays
21 celebrating LGBTQ Pride Month, Asian American Native Hawaiian Pacific Islander Heritage
22 Month, Black History Month, Arab American Heritage Month, Hispanic Heritage Month, and other
23 cultural celebrations. These efforts reflected the Librarians’ professional training and California’s
24 legal mandate to provide students with diverse and inclusive educational materials under the FAIR
25 Education Act.

26 79. Several of the Librarians have served as leaders of LGBTQ clubs at their respective
27 schools. Plaintiff Balistreri founded and led the Gender and Sexuality Alliance (“GSA”) club at
28 Mount Miguel High School, while Plaintiff SaBell-Stoltz served as advisor for the GSA club at

1 Monte Vista High School for approximately three years. Plaintiff SaBell-Stoltz led her GSA club in
2 participating in LGBTQ activities including the Day of Silence, had club t-shirts made, and
3 organized GSA events both at her school and at other sites across the district. Plaintiff Macecca
4 advocated for the GSA club to be restarted at Valhalla High School, advocated at board meetings
5 for bathrooms to be designated for LGBTQ students, and provided bathroom space in the library for
6 any LGBTQ or special education students who needed privacy. Plaintiff Sannwald was a member
7 of the West Hills High School Equity Committee and its LGBTQ+ Inclusion Subcommittee. The
8 Librarians generally displayed GSA club flyers, inclusivity posters, and promotional materials in
9 their libraries and created buttons for the GSA clubs.

10 80. In or around 2023, when far-right agitators attempted to disrupt an LGBTQ student
11 group meeting at a library, Plaintiffs Macecca, Jackson, and Sannwald stood guard outside the
12 library to physically protect the students from intimidation and harassment. This incident
13 exemplifies a recurring theme in this case: the Librarians put their own safety and professional
14 standing at risk to ensure LGBTQ students could meet safely and without fear.

15 ***The Librarians Publicly Oppose the Anti-LGBTQ Board Members' War Against***
16 ***LGBTQ Students and Staff***

17 81. Because the Librarians established themselves as outspoken advocates for LGBTQ
18 students and against the Board, they put themselves in the line of fire.

19 82. In or around 2022, the District began slowing the process for approving books
20 recommended by Librarians for GUHSD curriculum and libraries. In or around 2023, the District
21 suddenly began requiring the Librarians to submit detailed book lists to principals for approval
22 before purchasing could occur—a significant departure from prior practice in which the Librarians
23 exercised professional discretion in selecting materials. At Monte Vista High School, Plaintiff
24 SaBell-Stoltz's principal—who had approved her diverse book selections without issue for years—
25 warned her, "***be careful, don't get me in trouble,***" when she selected books about people of color
26 and transgender individuals.

1 83. Thereafter, the District placed an increasing number of recommended titles into
2 “approval limbo”—neither approved nor denied—with books featuring LGBTQ themes, diverse
3 racial perspectives, or progressive viewpoints disproportionately targeted.

4 84. In response to the Board’s increasing censorship of books featuring diverse
5 characters and LGBTQ themes, the Librarians organized and encouraged the District’s participation
6 in a district-wide professional development training hosted by the San Diego County Office of
7 Education. The Librarians promoted and facilitated attendance for then-Superintendent Mary Beth
8 Kastan and all GUHSD principals at the November 13, 2023 training.. The training, held at the San
9 Diego County Office of Education, addressed the Librarians’ concerns over the lack of a transparent
10 book approval process at GUHSD and the emerging national trend of book bans. It also emphasized
11 the importance of diverse representation in school literature and focused specifically on challenges
12 to LGBTQ-themed materials.

13 85. Following the training, on behalf of the Librarians, Plaintiff Balistreri emailed Ms.
14 Kastan and then-Assistant Superintendent Michael Fowler reiterating the Librarians’
15 recommendations for a fair and balanced book-challenge procedure. Plaintiff Balistreri’s email
16 noted that state law mandates inclusive teaching related to the LGBTQ community and other
17 underrepresented groups and cited the FAIR Education Act. The Librarians’ concerns were ignored.

18 86. Over the course of nearly two years—from September 2023 through May 2025—the
19 Librarians repeatedly and courageously spoke out at Board meetings, advocating for LGBTQ
20 students, opposing discriminatory policies, defending intellectual freedom, and protecting
21 colleagues from discriminatory layoffs.

22 87. In fall 2023, the Librarians publicly opposed the Anti-LGBTQ Board Members’
23 discriminatory decisions to cancel the SDYS contract and the Learning Launch event. As part of
24 their visible dissent, they wore branded black lanyards in solidarity with those affected by the
25 Board’s actions and spoke out directly at Board meetings.

26 88. The Librarians also publicly opposed the Board’s discriminatory and retaliatory
27 decision to lay off employees in the Ed Services Department who supported DEI. Several Librarians
28

1 spoke directly to the Anti-LGBTQ Board Members during public comment at Board meetings,
2 urging them to reconsider the layoffs in from March through May 2024.

3 89. On or about March 17, 2024, Plaintiff Sannwald created the *GUHSDinformed*
4 website to draw public attention to the District’s elimination of the Ed Services Department. The
5 website featured more than 100 testimonials from GUHSD employees, parents, and community
6 members expressing support for the departments, positions, and individuals targeted for layoff and
7 highlighting the critical contributions of those employees. Plaintiff Sannwald continued to update
8 the website to report which positions were ultimately eliminated and to identify the Board
9 Members—Shield, Woods, and Kelly—who voted to approve the layoffs in May 2024.

10 ***The Librarians Exercise Their Constitutional Rights to Engage in Political Activity***

11 90. At all relevant times, Plaintiffs were members of the Grossmont Education
12 Association (“GEA”), which the Anti-LGBTQ Board Members viewed as a political and ideological
13 adversary. GEA endorsed progressive candidates for the GUHSD Board, including Chris Fite, Elva
14 Salinas, and Jay Steiger in the 2024 race against Mr. Eckert.

15 91. The Librarians openly supported GEA, its positions, and progressive candidates
16 opposing the Anti-LGBTQ Board Members and their allies. The Librarians wore union colors and
17 GEA t-shirts on designated days to show union support at their worksites. Multiple Librarians made
18 monetary contributions to progressive board candidates, including to Mr. Fite, Ms. Salinas, and Mr.
19 Steiger. Several Librarians participated in school board election canvassing, phone banking, and
20 walked door-to-door distributing campaign materials in support of their candidacies. After the Anti-
21 LGBTQ Board Members’ “ghost candidate” scandal was exposed, several Librarians also
22 contributed to recall efforts targeting Mr. Eckert.

23 92. From 2022 through 2025, multiple Librarians were elected to union leadership by
24 running on progressive and inclusive platforms. Plaintiff Scott previously served as GEA Site
25 Representative at Granite Hills High School from 2014 to 2016 and again from 2022 to 2024. In
26 April 2024, Plaintiff Sannwald was elected GEA Site Representative at West Hills High School. In
27 April 2025, Plaintiff Balistreri was elected GEA Board Member-at-Large.

28

1 93. Starting in 2021, Anti-LGBTQ Board Member co-conspirator Jessica Merschtina
 2 served as Vice President of GEA. In April 2024, Plaintiff Macceca ran against Ms. Merschtina in
 3 the union election and defeated her. Following Ms. Merschtina’s loss, the Anti-LGBTQ Board
 4 Members moved swiftly to reward Ms. Merschtina for her loyalty during her tenure as Vice
 5 President and to retaliate against the Librarians and other LGBTQ-supportive allies.

6 94. Following Plaintiff Macceca’s election as GEA Vice President, the Board abruptly
 7 ceased all cooperative communications with the union. The District cut off the regular “Fireside
 8 Chat” meetings between the Superintendent, District administrators, and GEA officers, which had
 9 previously served as a forum for addressing issues affecting GEA bargaining-unit members.

10 95. On July 18, 2024—less than three months after her election loss—GUHSD appointed
 11 Ms. Merschtina to the position of Director of GUHSD’s Human Resources Department, despite her
 12 lack of prior experience in District administration. In a July 14, 2024 email between Mr. Kelly, Ms.
 13 Merschtina, Dr. Woods and Mr. Hobbs, Mr. Kelly explained that hiring Ms. Merschtina over the
 14 summer would avoid scrutiny from their ideological “opponents,” stating in part:

15 I have had several conversations with Rob [Shield] about putting
 16 Jessica [Merschtina] in that position . . . the perfect time to do
 17 something like this is during the summer where, *even if anyone of*
 18 *our opponents notices it, there is no way they could muster any kind*
 19 *of a significant protest* . . . to catch our opponents off guard where
 20 they can cause the least amount of disruption and use it to attack us.

21 ***The Anti-LGBTQ Board Members and Their Co-Conspirators Escalate Harassment***
 22 ***Against the Librarians, Culminating in a Mass Layoff***

23 96. In 2024, in response to the Librarians’ increased political engagement and advocacy
 24 for LGBTQ individuals, the Anti-LGBTQ Board Members and their co-conspirators escalated their
 25 harassment into a coordinated campaign of surveillance and intimidation. In or around June 2024,
 26 Plaintiff O’Meara received an anonymous and unsettling voicemail from an unidentified individual
 27 requesting a list of LGBTQ-themed books in her library. Around the same time, the principal of
 28 Santana High School summoned Plaintiff Bachmann to a meeting to question her about an LGBTQ
 Pride display in the library. During that meeting, the principal accused Plaintiff Bachmann of

1 keeping the display up longer than other displays—an assertion that was inaccurate and, in any
2 event, irrelevant and improper.

3 97. In or around August 2024, the District’s IT Department, acting at the direction of the
4 Anti-LGBTQ Board Members and Mr. Hobbs, initiated targeted digital surveillance of all nine
5 Librarians, including monitoring their internet activity, browser history, and electronic
6 communications. This selective surveillance far exceeded routine IT oversight and was undertaken
7 for retaliatory and intimidating purposes.

8 98. By the fall of 2024, the Librarians reasonably believed they were being targeted for
9 elimination by the Anti-LGBTQ Board Members. Anticipating adverse action, the Librarians
10 undertook extensive advocacy efforts. These efforts included organizing a “Read Across East
11 County” community literacy event in January 2025; producing library promotional videos in
12 partnership with District CTE programs; and creating PowerPoint presentations documenting their
13 essential contributions to student learning. Between November 2024 and February 2025, the
14 Librarians repeatedly requested time on the public Board agenda to present this information and
15 defend their positions. Despite multiple requests, they were consistently denied agenda access
16 without explanation. These denials stood in stark contrast to the routine approval granted to other
17 departments facing potential RIFs, which were permitted to present PowerPoints and advocacy
18 materials to the Board.

19 99. In response, Plaintiff Sannwald and Plaintiff Balistreri launched the public advocacy
20 website “*Save GUHSD Teacher Librarians.*” The website highlighted the Librarians’ essential role
21 in student success, challenged the District’s newly asserted budgetary justifications, and encouraged
22 community members to participate in advocacy efforts and speak at Board meetings.

23 100. Around this time, Plaintiff Jackson encouraged Board President Dr. Woods to
24 participate in an official tour of her library at El Cajon Valley High School so the Board could better
25 understand the integral role librarians play in student learning. Dr. Woods agreed but later canceled
26 the scheduled visit. Plaintiff Jackson attempted to follow up and reschedule the tour; however, her
27 communications went unanswered. Instead, during Spring Break—while Plaintiff Jackson was off
28 campus—Dr. Woods, his wife, Mr. Eckert, and Mr. Hobbs appeared at the El Cajon Valley High

1 School library unannounced. Plaintiff Jackson’s subsequent follow-up efforts likewise received no
2 response.

3 101. On or about February 26, 2025, the District responded not with engagement, but with
4 legal threats. The District accused the Librarians of trademark infringement on the website and
5 objected to the posting of a photograph of Plaintiff Balistreri receiving an educator award that
6 included student faces—the same photograph that had previously been posted on the school’s
7 official ASB Instagram account without objection. These threats were intended to intimidate staff,
8 suppress advocacy, and silence the Librarians’ protected speech.

9 102. The very next day, at the February 27, 2025 Board Meeting, the Anti-LGBTQ Board
10 Members voted to RIF 49.2 certificated positions from GUHSD, including all nine Teacher
11 Librarians. Board Members Mr. Eckert, Dr. Woods, Mr. Kelly, and Mr. Shield voted in favor of the
12 resolution, with Mr. Fite dissenting.

13 103. While the February 27, 2025 resolution proposed reductions across several
14 certificated classifications, the District sought to eliminate *every single Teacher Librarian position*,
15 effectively dismantling the entire librarian program. No other certificated classification was wholly
16 eliminated.

17 104. The February 27, 2025 Board meeting was scheduled with minimal notice and held
18 at an off-site location—El Cajon Valley High School’s multi-purpose room—at 4:00 p.m., a time
19 and place that appeared designed to suppress public attendance. Despite this, more than 500
20 members of the public attended, and approximately 90 speaker cards were submitted. Only about
21 20 speakers were permitted to speak. Every speaker opposed the cuts, yet no Board member offered
22 any substantive justification for the eliminations.

23 105. The Board publicly justified the elimination of all Teacher Librarian positions as a
24 budgetary necessity, but that justification was pretextual. At the time of the layoffs, GUHSD held
25 more than \$100 million in reserves, including over \$46 million available for emergencies, while
26 simultaneously creating high-paying administrative positions for Board allies, including a \$187,000
27 Chief of Staff position for Mr. Hobbs. Indeed, just months later, on December 15, 2025, the Board
28 voted to give themselves *massive* raises. In past years, the Board awarded themselves a 5% raise in

1 2023 – compared to a 0% raise for teachers. They awarded themselves another 5% increase in 2024,
 2 with teachers only getting a 1% increase. Now, ***the Board has effectively given themselves a 373%***
 3 ***raise in 2025*** (along with medical benefits, long-term disability, travel expenses, and retirement
 4 health benefits), compared to a 2% raise for teachers.

5 106. Yet, on May 8, 2025, the GUHSD Board approved the elimination of all nine Teacher
 6 Librarian positions under the hypocritical pretext of budgetary reasons. In a 4-1 vote, all Board
 7 members except Mr. Fite approved the resolution. Before the vote, Mr. Fite openly questioned the
 8 stated financial rationale for the layoff, asking: “***There are other motives than saving money. I***
 9 ***think it is only fair to ask what is that? What is the vision? What is the direction? I’m on the***
 10 ***Board and I don’t know what it is.***” Rather than respond, Dr. Woods cut off discussion and called
 11 for a vote, stating, “Please vote, then we will continue discussion.” Although Mr. Fite moved to
 12 amend the resolution to preserve the Librarians positions, no other Board member seconded the
 13 motion.

14 ***The Anti-LGBTQ Board Members’ Attack on the Librarians Draws Media Scrutiny and***
 15 ***Reveals Their True Motives Through Leaked Texts and Emails***

16 107. The Board’s discriminatory campaign against the Librarians and the resulting public
 17 outcry drew media scrutiny. Starting in June 2025, the *San Diego Union-Tribune* published several
 18 exposés detailing the actions of the Anti-LGBTQ Board Members.⁸ The articles relied on records
 19 obtained through CPRA requests, including emails and text messages showing that the Anti-LGBTQ
 20 Board Members and their co-conspirators engaged in serial meetings outside public view, in
 21 violation of the Ralph M. Brown Act, to coordinate and predetermine personnel decisions.

22 108. The public records reveal explicit animus toward LGBTQ-supportive staff and union
 23 activists—particularly the Librarians. CPRA-produced communications among the Anti-LGBTQ
 24 Board Members, Mr. Howard, Mr. Hobbs, and their allies included the following:

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 26
 27 ⁸ Kristin Taketa & Jemma Stephenson, *Grossmont school trustees regularly discussed board*
 28 *business in private texts and emails*, S.D. UNION TRIBUNE, June 13, 2025,
<https://www.sandiegouniontribune.com/2025/06/13/grossmont-school-trustees-regularly-discussed-board-business-in-private-texts-and-emails/>.

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A group text on January 27, 2025, regarding eliminating the Librarians’ positions, with Mr. Hobbs stating: “***RIF RIF RIF!!!***” followed by Mr. Kelly replying: “***Let’s do it ASAP.***” Dr. Woods responded with thumbs-up, flexing arm, and American flag emoji.

- On the same date, Dr. Woods texting: “***East County Values ! . . . Let’s end DEI!***” and “***Tell GEA to get out of the way!***”
- Jerry Hobbs complaining about the Librarians on October 11, 2024, stating: “***we’re spending \$2 million to indoctrinate kids of the DEI and LGBTQ and militant trans agenda.***”
- Ms. Merschtina texting a screenshot of Plaintiff Macceca’s donation to Jay Steiger’s campaign on October 11, 2024, and writing: “***Jerry - I went through Steiger’s contributions you sent & found that [Plaintiff Macceca] gave him \$100 & so did the art teacher from El Cajon Valley. Hopefully when it comes time to RIF the librarians, Rob [Shield] will keep this in mind.***” with Mr. Hobbs replying: “***He has/will.***”
- On October 11, 2024, Mr. Hobbs texted in a group chat: “***Stephanie Macceca, GEA VP who unseated Jessica [Merschtina], is a librarian at Valhalla. Can’t wait to see how her and the other anti-Board librarians spent their pot of gold ... bought woke books that ‘affirm’ the crazy ideas of teenagers.***”
- Dr. Woods text message on October 11, 2024, stating: “***freeze all library funds and micromanage all library purchases.***”
- Mr. Kelly’s January 27, 2025 text stating: “***The last thing I heard from Rob [Shield] was that he was coming up with a strategy which was making a [book approval] process, which would be impossible for ‘woke’ books to be adopted.***”
- Mr. Hobbs’ text message in group chat between Mr. Eckert, Mr. Shield, Dr. Woods, and Ms. Merschtina on January 8, 2025, expressing outrage towards GEA stating: “***Some things should never be forgotten or forgiven. . . Ever!***” and “***[t]hey attacked the character of our Board candidates and Trustees. Uncalled for and inexcusable. I will never forget or forgive them for such intentional acts.***”

109. These communications, many of which constitute facial violations of the Brown Act, serve as direct and damning evidence of discriminatory animus toward the Librarians, toward the union⁹, and toward LGBTQ and DEI initiatives.

⁹ The GEA filed an Unfair Practice Charge to the Public Employment Relations Board on behalf of the nine librarians on November 7, 2025, based on these facts as well as the deceptive campaign practices of the Anti-LGBTQ Board Members.

1 ***The Anti-LGBTQ Board Continues Their Campaign of Harassment, Discrimination***
2 ***and Retaliation Against Plaintiffs After the RIF***

3 110. The Anti-LGBTQ Board Members and their co-conspirators never intended the
4 CPRA-released communications to become public. Their disclosure exposed the Board’s true
5 motives, eliminated any pretense of lawful or good-faith decision-making toward the Librarians,
6 and triggered immediate backlash from the media and the community.

7 111. In response to the surge of public support for the Librarians, Dr. Woods engaged in
8 targeted retaliation intended to shift public sentiment against Plaintiffs and back in the Board’s favor.
9 On or about September 23, 2025, Dr. Woods posted on his public Facebook page disclosing the
10 salary of Plaintiff Macceca, who is a 19-year District employee, stating that she received “\$209,350
11 total compensation including pay and benefits as a librarian” in 2024.¹⁰ He further asked: “***Why did***
12 ***she get so much more than other teachers? Who bargained for this at the expense of other***
13 ***hardworking dedicated teachers? Why do so few get so much? Does this seem right to you?***” This
14 disclosure was intended to embarrass, vilify, intentionally harm, and retaliate against Plaintiff
15 Macceca for her leadership in advocating for LGBTQ students and calling out the Anti-LGBTQ
16 Board Members’ unlawful conduct.

17 112. Around the same time, Dr. Woods publicly posted anti-DEI content on social media
18 demonstrating overt discriminatory animus toward diversity, equity, and inclusion. In one post, he
19 stated: “***DEI is affirmative action for WHITE LEFTISTS—it has become a scam. It no longer***
20 ***helps Blacks and Latinos.***” Dr. Woods later removed these posts.

21 113. Plaintiff Macceca was subjected to further targeted retaliation intended to punish and
22 intimidate her for her advocacy against the Anti-LGBTQ Board Members’ discriminatory actions.
23 On or about August 27, 2025, she received a verbal warning and a Written Reprimand—her first
24 and only disciplinary action in nearly two decades of employment at GUHSD—for allegedly
25

26
27 ¹⁰ Plaintiffs’ compensation structures, including that of Plaintiff Macceca, are based on
28 collectively bargained contractual salary schedules tied to years of service and educational
credentials. Contrary to Dr. Woods’ claim, these rates were not individually negotiated by Plaintiff
Macceca or any other librarian.

1 “politically organizing during a staff meeting.” This allegation was false. The meeting was a
2 sanctioned thirty-minute union meeting held during pre-service workdays, approved by the
3 principal, and conducted annually for years. Plaintiff Macceca did not organize or lead the meeting;
4 she merely attended. The GEA representative who actually ran the meeting was never disciplined.

5 114. In December 2025, a Library Technician position—a subordinate role to the Teacher-
6 Librarians—at Santana High School became vacant upon the incumbent’s retirement. Despite
7 Plaintiffs being fully qualified for the position, Defendants instead hired a site supervisor who had
8 no prior library training or experience.

9 ***Defendants’ Conduct Has Caused Plaintiffs Severe Financial, Emotional,***
10 ***Career, and Reputational Harm***

11 115. As a direct result of Defendants’ unlawful conduct, Plaintiffs have suffered
12 substantial economic losses, including salary reductions, lost summer employment opportunities,
13 diminished retirement contributions, and reduced future earning capacity. Plaintiffs will also incur
14 adverse tax consequences because back pay and lost earnings will be paid in lump sums rather than
15 over time.

16 116. Plaintiffs have endured severe and ongoing emotional distress, mental anguish,
17 humiliation, and reputational harm. Defendants’ escalating campaign of harassment, disparagement
18 and discrimination has caused several Plaintiffs to require medical treatment and leaves of absence.
19 Multiple Plaintiffs have been diagnosed with clinical depression, anxiety, and panic disorders
20 requiring medication and ongoing therapy. Plaintiffs continue to experience symptoms including
21 uncontrollable crying, sleep disturbances, loss of appetite, gastrointestinal distress, stress-related
22 physical pain, and persistent feelings of hopelessness.

23 117. Plaintiffs’ reputations have been deliberately undermined. In text messages and in
24 public communications, the Anti-LGBTQ Board Members mocked the Librarians, falsely
25 portraying them as extremists with a “militant” LGBTQ “agenda” or as attempting to “indoctrinate”
26 students. After the RIF, the District pursued a “divide and conquer” strategy by publicly portraying
27 Plaintiffs as overpaid and suggesting the union improperly prioritized them over other employees.
28

1 These mischaracterizations damaged Plaintiffs’ relationships with colleagues, tarnished their
2 professional standing, and harmed future career opportunities.

3 118. The elimination of all Teacher Librarian positions has also caused harm to GUHSD
4 students and the broader community. Defendants’ actions sent an unmistakable message to LGBTQ
5 students, teachers and families: *you are not welcome here*. As repeatedly emphasized by students
6 and community members at Board meetings, school libraries serve as vital educational and safety
7 hubs. Students lost access to credentialed library professionals who provided research instruction,
8 information-literacy training, technology support, personalized reading guidance, and safe,
9 welcoming spaces—particularly for LGBTQ students and other marginalized youth.

10 FIRST CAUSE OF ACTION

11 **Discrimination Based on Sexual Orientation, Gender Expression 12 and Gender Identity 13 In Violation of Government Code §12940(a)**

14 **(Against All Defendants)**

15 119. Plaintiffs reallege and incorporate herein by reference each allegation in the
16 preceding and subsequent paragraphs.

17 120. Under the FEHA, “[i]t is an unlawful employment practice . . . [f]or an employer,
18 because of the . . . gender identity, gender expression . . . [or] sexual orientation . . . of any person
19 . . . to discharge the person from employment . . . or to discriminate against the person in
20 compensation or in terms, conditions, or privileges of employment.” Gov’t Code §12940(a).

21 121. FEHA’s protections extend not only to individuals who personally possess a
22 protected characteristic, but also to individuals who are discriminated against because of their
23 association with, advocacy for, or perceived alignment with members of a protected class. Gov’t
24 Code §12926(o) (the enumerated protected characteristics include not only a “perception that the
25 person has any of those characteristics” but also a “perception that the person is associated with a
26 person who has, or is perceived to have, any of those characteristics”); 2 Cal. Code Regs. §11022(a)
27 (“It is unlawful for an employer . . . to deny employment benefits to, harass, or intimidate any . . .
28 employee because the employer . . . disapproves generally of the . . . employee’s association with
individuals because they are in a category enumerated in the Act.”).

1 122. At all relevant times, Plaintiffs were openly and visibly associated with LGBTQ
2 students, staff, and community members, and were known advocates for LGBTQ inclusion, equity,
3 and safety within the District. Plaintiffs' advocacy included, among other things, supporting LGBTQ
4 students; opposing discriminatory policies and practices; defending intellectual freedom and
5 inclusive curricula; and publicly criticizing Defendants' anti-LGBTQ actions.

6 123. Defendants were aware of Plaintiffs' association with and advocacy for LGBTQ
7 individuals and perceived Plaintiffs as aligned with LGBTQ people and LGBTQ-affirming
8 viewpoints.

9 124. Because of this association and advocacy, Defendants subjected Plaintiffs to adverse
10 employment actions, including but not limited to: heightened scrutiny and surveillance; harassment
11 and intimidation; suppression of Plaintiffs' professional discretion; disciplinary actions; denial of
12 employment opportunities; and the elimination of Plaintiffs' positions.

13 125. Defendants' actions were motivated, at least in substantial part, by discriminatory
14 animus toward LGBTQ individuals and by hostility toward Plaintiffs' association with, support for,
15 and advocacy on behalf of LGBTQ students and staff. Plaintiffs were targeted not because of
16 performance or legitimate business reasons, but because they were perceived as allies, advocates,
17 and supporters of LGBTQ people and inclusive education.

18 126. As a proximate result of Defendants' wrongful conduct, Plaintiffs have suffered, and
19 continue to suffer, substantial losses in earnings, earning capacity, and other benefits of employment,
20 all in an amount to be determined according to proof at the time of trial. Plaintiffs will also suffer
21 tax consequences due to GUHSD's failure to pay Plaintiffs money owed, which will come due in a
22 lump sum in the future. Accordingly, Plaintiffs are entitled to an additional amount of damages to
23 offset the tax consequences of a lump sum award for lost earnings, plus interest.

24 127. As a further proximate result of Defendants' wrongful conduct, Plaintiffs have
25 suffered, and continue to suffer, humiliation, embarrassment, emotional distress, and mental
26 anguish, all in an amount to be determined according to proof at the time of trial.

27 128. Plaintiffs are also entitled to attorneys' fees and costs pursuant to Government Code
28 §12965(c)(6), because of Defendants' wrongful conduct.

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SECOND CAUSE OF ACTION

Discrimination in Violation of Government Code §11135

(Against All Defendants)

129. Plaintiffs reallege and incorporate herein by reference each allegation in the preceding and subsequent paragraphs.

130. “No person in the State of California shall, on the basis of . . . sexual orientation, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state.” Gov’t Code §11135. “The protected bases used in this section include a perception that a person has any of those characteristics or that the person is associated with a person who has, or is perceived to have, any of those characteristics.” *Id.* (emphasis added).

131. “This article and regulations adopted pursuant to this article may be enforced by a civil action for equitable relief, which shall be independent of any other rights and remedies.” Gov’t Code §11139; *see Donovan v. Poway Unified Sch. Dist.*, 167 Cal. App. 4th 567, 594 (2008) (a victim of discrimination “need not pursue administrative or any other remedies prior to, or instead of, bringing an action for equitable relief, nor would any victim be required to elect one remedy”) (quoting Assem., 3d reading analysis of Assem. Bill No. 677 (2001–2002 Reg. Sess.) as amended Apr. 25, 2001, p. 3).

132. Defendants’ programs and activities are conducted, operated, and/or administered by the state or by a state agency, and/or they are funded directly by the state, and/or receive financial assistance from the state.

133. Plaintiffs suffered severe, pervasive, and offensive harassment and discrimination because of their association with and support of LGBTQ students, staff, and community members, which effectively deprived Plaintiffs of the right of equal access to benefits and opportunities. Defendants had actual knowledge of the harassment and discrimination, but acted with deliberate indifference in the face of such knowledge.

1 134. As a proximate result of Defendants’ wrongful conduct, Plaintiffs have suffered, and
 2 continue to suffer, substantial losses in earnings, earning capacity, and other benefits of employment.
 3 As a further proximate result of Defendants’ wrongful conduct, Plaintiffs have suffered, and
 4 continue to suffer, humiliation, embarrassment, emotional distress, and mental anguish.

5 135. Accordingly, Plaintiffs bring this action for the following equitable relief: (1) to have
 6 Defendants’ discriminatory demotions voided, (2) to have declaratory, equitable, and injunctive
 7 relief prohibiting the Anti-LGBTQ Majority Board from taking discriminatory actions, and (3) to
 8 have Defendants maintain a workplace free of discrimination, harassment, and retaliation in
 9 compliance with the FEHA, the Education Code, GUHSD’s anti-discrimination policies, and the
 10 Anti-Discrimination Laws. Because the GUHSD Board has “control” of the school district (Educ.
 11 Code §35010), they are appropriate actors to enjoin from engaging in their unlawful conduct. *See*
 12 *Freedom from Religion Found., Inc. v. Chino Valley Unified Sch. Dist. Bd. of Educ.*, 896 F.3d 1132,
 13 1141 (9th Cir. 2018).

THIRD CAUSE OF ACTION

**Retaliation for Reporting and Opposing Discrimination
 In Violation of Government Code §12940(h)**

(Against All Defendants)

17 136. Plaintiffs reallege and incorporate herein by reference each allegation in the
 18 preceding and subsequent paragraphs.

19 137. Government Code §12940(h) makes it unlawful for an employer to retaliate against,
 20 or otherwise “discriminate against any person because the person has opposed any practices
 21 forbidden” by the FEHA or because the employee “has filed a complaint, testified, or assisted in any
 22 proceeding under this part.” Gov’t Code §12940(h).

23 138. As set forth in greater detail, *supra*, Plaintiffs reported and opposed the Anti-LGBTQ
 24 Board Members’ discriminatory campaign against LGBTQ staff, students and allies by wearing
 25 visible symbols of LGBTQ advocacy in response to discriminatory District actions; reporting
 26 unlawful and discriminatory book censorship; and speaking up against the Anti-LGBTQ Board
 27 Members during meetings and through online advocacy.
 28

1 139. Defendants retaliated against Plaintiffs because of their opposition and protected
 2 reports. Defendants subjected Plaintiffs to adverse employment actions, including but not limited
 3 to: heightened scrutiny and surveillance; harassment and intimidation; suppression of Plaintiffs’
 4 professional discretion; disciplinary actions; denial of employment opportunities; and the
 5 elimination of Plaintiffs’ positions.

6 140. As a proximate result of Defendants’ wrongful conduct, Plaintiffs have suffered, and
 7 continue to suffer, substantial losses in earnings, earning capacity, and other benefits of employment,
 8 all in an amount to be determined according to proof at the time of trial. Plaintiffs will also suffer
 9 tax consequences due to GUHSD’s failure to pay Plaintiffs money owed, which will come due in a
 10 lump sum in the future. Accordingly, Plaintiffs are entitled to an additional amount of damages to
 11 offset the tax consequences of a lump sum award for lost earnings, plus interest.

12 141. As a further proximate result of Defendants’ wrongful conduct, Plaintiffs have
 13 suffered, and continue to suffer, humiliation, embarrassment, emotional distress, and mental
 14 anguish, all in an amount to be determined according to proof at the time of trial.

15 142. Plaintiffs are also entitled to attorneys’ fees and costs pursuant to Government Code
 16 §12965(c)(6), because of Defendants’ wrongful conduct.

17 **FOURTH CAUSE OF ACTION**

18 **Harassment based on Sexual Orientation, Gender Expression**
 19 **and Gender Identity in Violation of Government Code §12940(j)**

20 **(Against GUHSD and DOES 1-25)**

21 143. Plaintiffs reallege and incorporate here by reference each allegation in the preceding
 22 and subsequent paragraphs.

23 144. The FEHA prohibits harassment of an employee because of a protected
 24 characteristic, including sexual orientation, gender identity, and gender expression. Gov’t Code
 25 §12940(j). FEHA further prohibits harassment based on an employee’s association with, advocacy
 26 for, or perceived alignment with individuals in a protected class, including LGBTQ individuals.
 27 Gov’t Code §12926(o) (the enumerated protected characteristics include not only a “perception that
 28 the person has any of those characteristics” but also a “perception that the person is associated with

1 a person who has, or is perceived to have, any of those characteristics”); 2 Cal. Code Regs.
2 §11022(a) (“It is unlawful for an employer . . . to deny employment benefits to, harass, or intimidate
3 any . . . employee because the employer . . . disapproves generally of the . . . employee’s association
4 with individuals because they are in a category enumerated in the Act.”).

5 145. “Loss of tangible job benefits shall not be necessary in order to establish
6 harassment.” Gov’t Code §12940(j). Also, the “existence of a hostile work environment depends
7 upon the totality of the circumstances and a discriminatory remark, even if not made directly in the
8 context of an employment decision or uttered by a nondecision maker, may be relevant,
9 circumstantial evidence of discrimination.” Gov’t Code §12923(c). “A single incident of harassing
10 conduct is sufficient to create a triable issue regarding the existence of a hostile work environment
11 if the harassing conduct has unreasonably interfered with the plaintiff’s work performance or created
12 an intimidating, hostile, or offensive working environment.” Gov’t Code §12923(b).

13 146. At all relevant times, Plaintiffs were openly and visibly associated with LGBTQ
14 students, staff, and community members and were known advocates for LGBTQ inclusion, safety,
15 and equity within the District. Plaintiffs’ advocacy included supporting LGBTQ students;
16 maintaining inclusive and affirming school environments; opposing discriminatory policies;
17 defending intellectual freedom; and publicly criticizing the Board’s anti-LGBTQ actions.

18 147. Defendants were aware of Plaintiffs’ association with and advocacy for LGBTQ
19 individuals and perceived Plaintiffs as aligned with LGBTQ people and LGBTQ-affirming
20 viewpoints.

21 148. Because of this association and advocacy, Defendants subjected Plaintiffs to a pattern
22 of harassment, intimidation, and hostility, including but not limited to: (1) heightened scrutiny and
23 surveillance of Plaintiffs’ work and speech; (2) reprimands and intimidation related to LGBTQ-
24 inclusive materials, displays, or advocacy; (3) public and private disparagement portraying Plaintiffs
25 as extremists or as promoting a “militant” LGBTQ agenda; (4) misuse of disciplinary processes and
26 baseless accusations tied to Plaintiffs’ protected activity; (5) suppression of Plaintiffs’ professional
27 judgment and authority; and (6) public actions designed to shame, humiliate, and isolate Plaintiffs
28 within the workplace.

1 149. This conduct was unwelcome, hostile, and abusive, and was sufficiently severe and
2 pervasive to alter the terms and conditions of Plaintiffs' employment and to create a hostile work
3 environment. Defendants' conduct went beyond ordinary workplace disagreements and constituted
4 targeted harassment driven by discriminatory animus toward LGBTQ individuals and hostility
5 toward Plaintiffs' association with and advocacy for them.

6 150. The harassment was both subjectively offensive to Plaintiffs and objectively
7 offensive to a reasonable person in Plaintiffs' position, particularly given Defendants' authority over
8 Plaintiffs' employment and the repeated, escalating nature of the conduct.

9 151. The harassment was carried out by supervisors, managers, and Board Members. The
10 District knew or should have known of the harassment and failed to take immediate and appropriate
11 corrective action. Instead, the District ratified and perpetuated the harassment.

12 152. As a proximate result of Defendants' wrongful conduct, Plaintiffs have suffered, and
13 continue to suffer, substantial losses in earnings, earning capacity, and other benefits of employment,
14 all in an amount to be determined according to proof at the time of trial. Plaintiffs will also suffer
15 tax consequences due to GUHSD's failure to pay Plaintiffs money owed, which will come due in a
16 lump sum in the future. Accordingly, Plaintiffs are entitled to an additional amount of damages to
17 offset the tax consequences of a lump sum award for lost earnings, plus interest.

18 153. As a further proximate result of Defendants' wrongful conduct, Plaintiffs have
19 suffered, and continue to suffer, humiliation, embarrassment, emotional distress, and mental
20 anguish, all in an amount to be determined according to proof at the time of trial.

21 154. Plaintiffs are also entitled to attorneys' fees and costs pursuant to Government Code
22 §12965(c)(6), because of Defendants' wrongful conduct.

23 **FIFTH CAUSE OF ACTION**

24 **Failure to Prevent Discrimination, Harassment and Retaliation**
25 **In Violation of Government Code §12940(k)**

26 **(Against GUHSD and DOES 1-25)**

27 155. Plaintiffs reallege and incorporate here by reference each allegation in the preceding
28 and subsequent paragraphs.

1 Lab. Code §1102.5(b).

2 163. Further, “[a]n employer, or any person acting on behalf of the employer, shall not
3 retaliate against an employee for refusing to participate in an activity that would result in a violation
4 of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or
5 regulation.” Lab. Code §1102.5(c).

6 164. At all relevant times, Plaintiffs engaged in protected activity under Labor Code
7 §1102.5 by opposing and reporting conduct they reasonably believed to be unlawful discrimination
8 and exclusion based on sexual orientation, gender identity, and LGBTQ status, including conduct
9 that violated FEHA, the FAIR Education Act, the California Constitution, and state and federal civil
10 rights laws.

11 165. As set forth in greater detail, *supra*, Plaintiffs opposed and reported the Anti-LGBTQ
12 Board Members’ discriminatory campaign against LGBTQ staff, students and allies by wearing
13 visible symbols of LGBTQ advocacy in response to discriminatory District actions; opposing the
14 Anti-LGBTQ Board Members’ discriminatory decisions; advocating for colleagues targeted with
15 discrimination; challenging the District’s book censorship; creating advocacy websites and
16 materials; and raising their protected complaints directly to the Anti-LGBTQ Board Members at
17 Board meetings.

18 166. Plaintiffs’ protected opposition and reports were made in good faith and based on a
19 reasonable belief that Defendants’ conduct was unlawful. Plaintiffs were not required to prove an
20 actual violation of law to be protected under Labor Code §1102.5.

21 167. Defendants knew of Plaintiffs’ protected activities and perceived Plaintiffs as
22 employees who opposed LGBTQ discrimination and exclusionary practices and who supported
23 equality, equity, inclusion, and compliance with anti-discrimination laws.

24 168. Defendants subjected Plaintiffs to adverse employment actions, including but not
25 limited to: heightened scrutiny and surveillance; harassment and intimidation; suppression of
26 Plaintiffs’ professional discretion; disciplinary actions; denial of employment opportunities; and the
27 elimination of Plaintiffs’ positions.

28

1 169. Plaintiffs' protected activity was a contributing factor in Defendants' decision to take
2 adverse employment actions against them, in violation of Labor Code §1102.5.

3 170. As a proximate result of Defendants' wrongful conduct, Plaintiffs have suffered, and
4 continue to suffer, substantial losses in earnings, earning capacity, and other benefits of employment,
5 all in an amount to be determined according to proof at the time of trial. Plaintiffs will also suffer
6 tax consequences due to Defendants' failure to pay Plaintiffs money owed, which will come due in
7 a lump sum in the future. Accordingly, Plaintiffs are entitled to an additional amount of damages to
8 offset the tax consequences of a lump sum award for lost earnings, plus interest.

9 171. As a further proximate result of Defendants' wrongful conduct, Plaintiffs have
10 suffered, and continues to suffer, humiliation, embarrassment, emotional distress, and mental
11 anguish, all in an amount to be determined according to proof at the time of trial.

12 172. Plaintiffs are entitled to all available relief under Labor Code §§1102.5 and 1102.6,
13 including compensatory damages, injunctive relief, interest, costs, and reasonable attorneys' fees.

SEVENTH CAUSE OF ACTION

Political Discrimination In Violation of Labor Code §§ 98.6(a), 1101, and 1102

(Against All Defendants)

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15
16
17
18 173. Plaintiffs reallege and incorporate herein by reference each allegation in the
19 preceding and subsequent paragraphs.

20 174. California Labor Code §1101 prohibits employers from making, adopting, or
21 enforcing any rule, regulation, or policy—whether formal or informal—that forbids or prevents
22 employees from engaging or participating in politics, or that controls, directs, or tends to control or
23 direct the political activities or affiliations of employees. These protections extend to both written
24 policies and ad hoc or unwritten practices. *See Napear v. Bonneville Int'l Corp.*, 669 F. Supp. 3d
25 948 (E.D. Cal. 2023).

26 175. California Labor Code §1102 further provides that no employer shall coerce or
27 influence, or attempt to coerce or influence, employees through threats of discharge, loss of
28

1 employment, or other adverse consequences to adopt, follow, or refrain from adopting or following
2 any particular course of political action or political activity.

3 176. California Labor Code §98.6(a) makes it unlawful for an employer to discharge,
4 discriminate, retaliate, or take any adverse action against an employee because the employee
5 engaged in conduct protected under Labor Code §§101 or 1102. When read together, these statutes
6 prohibit retaliation, demotion, or termination motivated by an employee’s political beliefs,
7 advocacy, or protected political activity. *See Napear*, 669 F. Supp. 3d 948; *Couch v. Morgan Stanley*
8 *& Co.*, 656 F. App’x 841, 843 (9th Cir. 2016); *Surdak v. DXC Tech.*, No. 5:22-cv-00921-SB-KK,
9 2022 U.S. Dist. LEXIS 229114 (C.D. Cal. Dec. 20, 2022).

10 177. These provisions safeguard “the fundamental right of employees in general to engage
11 in political activity without interference by employers.” *Gay Law Students Ass’n v. Pac. Tel. & Tel.*
12 *Co.*, 24 Cal. 3d 458, 487 (1979). The California Supreme Court has defined “political activity”
13 broadly to include not only partisan politics, but also “the espousal of a candidate *or a cause*, and
14 some degree of action to promote the acceptance thereof by other persons,” including support of the
15 LGBTQ community. *Id.* (emphasis added).

16 178. At all relevant times, Plaintiffs engaged in protected political activity within the
17 meaning of Labor Code §§1101 and 1102 by opposing and speaking out against conduct they
18 reasonably believed constituted unlawful discrimination and exclusion based on sexual orientation,
19 gender identity, and LGBTQ status, including conduct that violated FEHA, the California
20 Constitution, the California Education Code, and state and federal civil rights laws.

21 179. As set forth in greater detail, *supra*, Plaintiffs opposed the Anti-LGBTQ Board
22 Members’ discriminatory campaign against LGBTQ staff, students, and allies by wearing visible
23 symbols of LGBTQ advocacy in response to discriminatory District actions; opposing the Anti-
24 LGBTQ Board Members’ discriminatory decisions; advocating for colleagues targeted due to their
25 protected status or advocacy; and objecting to policies and practices that marginalized LGBTQ
26 individuals and undermined inclusive education.

27 180. Defendants knew of Plaintiffs’ protected political activity and perceived Plaintiffs as
28 advocates for LGBTQ rights, inclusive education, and compliance with anti-discrimination laws.

1 181. In response to Plaintiffs’ protected political activity, Defendants subjected Plaintiffs
 2 to adverse employment actions, including but not limited to: heightened scrutiny and surveillance;
 3 harassment and intimidation; suppression of Plaintiffs’ professional discretion; disciplinary actions;
 4 denial of employment opportunities; and the elimination of Plaintiffs’ positions.

5 182. Plaintiffs’ protected political activities were a motivating and substantial factor in
 6 Defendants’ decision to take adverse action against them.

7 183. As a proximate result of Defendants’ wrongful conduct, Plaintiffs have suffered, and
 8 continue to suffer, substantial losses in earnings, earning capacity, and other benefits of employment,
 9 all in an amount to be determined according to proof at the time of trial. Plaintiffs will also suffer
 10 tax consequences due to Defendants’ failure to pay Plaintiffs money owed, which will come due in
 11 a lump sum in the future. Accordingly, Plaintiffs are entitled to an additional amount of damages to
 12 offset the tax consequences of a lump sum award for lost earnings, plus interest.

13 184. As a further proximate result of Defendants’ wrongful conduct, Plaintiffs have
 14 suffered, and continue to suffer, humiliation, embarrassment, emotional distress, and mental
 15 anguish, all in an amount to be determined according to proof at the time of trial.

16 185. Plaintiffs are entitled to all available relief under Labor Code §§1102.5 and 1102.6,
 17 including compensatory damages, injunctive relief, interest, costs, and reasonable attorneys’ fees.

EIGHTH CAUSE OF ACTION

**Violation of Free Speech Rights Under the California
 Constitution (Art. I, §2(a))**

(Against GUHSD and DOES 1-25)

21 186. Plaintiffs hereby incorporate by reference the foregoing allegations as if fully set
 22 forth herein.

23 187. Article I, section 2(a) of the California Constitution guarantees every person the right
 24 to freely speak, express, and publish their sentiments on all subjects, and provides broader
 25 protections for expressive conduct than those afforded under the First Amendment.

26 188. At all relevant times, Plaintiffs engaged in constitutionally protected expression,
 27 including but not limited to: wearing LGBTQ-affirming symbols; speaking out against the Anti-
 28

1 LGBTQ Board Members' discrimination; creating advocacy websites in support of departments at
2 risk of RIF; engaging in political activity in support of progressive board member candidates, such
3 as campaigning, handing out pamphlets and participating in phone banks; and expressing support
4 of LGBTQ students, coworkers and the community.

5 189. Plaintiffs' conduct constituted protected expressive activity and association under the
6 California Constitution. Political expression and expression of support for inclusive education and
7 diversity, equity, and inclusion are matters of both public and private significance and constitute
8 core forms of protected speech and expression. Plaintiffs' expression was lawful, non-disruptive,
9 and unrelated to job performance, and did not interfere with District operations or Plaintiffs' ability
10 to perform their duties.

11 190. In response to Plaintiffs' protected expression and association, Defendants engaged
12 in adverse actions intended to punish, marginalize, and silence Plaintiffs, including but not limited
13 to: heightened scrutiny and surveillance; harassment and intimidation; suppression of Plaintiffs'
14 professional discretion; disciplinary actions; denial of employment opportunities; and the
15 elimination of Plaintiffs' positions.

16 191. Defendants' actions were motivated by hostility toward Plaintiffs' protected
17 expression and were taken for the purpose and effect of chilling speech, discouraging open
18 expression of LGBTQ allyship, and signaling that employees who openly express same-sex
19 relationships or LGBTQ identities would suffer adverse consequences.

20 192. Defendants lacked any legitimate, compelling, or narrowly tailored justification for
21 retaliating against Plaintiffs' protected expression, and their conduct was arbitrary, discriminatory,
22 and unconstitutional.

23 193. Defendants' actions violated Plaintiffs' rights to free speech and expression under
24 Article I, §2(a) of the California Constitution, causing Plaintiffs to suffer economic loss, emotional
25 distress, reputational harm, and loss of professional standing.

26 194. Defendants' conduct was willful, malicious, and carried out with reckless disregard
27 for Plaintiffs' constitutional rights.

28

1 declaration may be affirmative or negative in form and effect, and the declaration shall have the
2 force of a final judgment. *Id.* This declarative remedy is cumulative, and shall not be construed as
3 restricting any remedy, provisional or otherwise, provided by law for the benefit of any party to the
4 action. C.C.P. §1062.

5 209. An actual and present controversy exists between the parties concerning their
6 respective rights and obligations under the Brown Act, including the legality of Defendants’
7 reduction-in-force decisions and whether Defendants violated Plaintiffs’ statutory rights by
8 deliberating and acting outside of properly noticed public meetings.

9 210. Plaintiffs therefore seek a judicial declaration that Defendants’ action eliminating
10 Plaintiffs’ role as Teacher Librarians in May 2025 was unlawful, void, and of no force or effect, and
11 was taken in violation of the Brown Act.

12 **ELEVENTH CAUSE OF ACTION**

13 **Injunctive Relief**

14 **(Against GUHSD and DOES 1-25)**

15 211. Plaintiffs reallege and incorporate here by reference each allegation in the preceding
16 and subsequent paragraphs.

17 212. Plaintiffs seek prospective injunctive relief to prevent Defendants from continuing
18 to engage in unlawful conduct, including violations of the Brown Act, harassment, retaliation and
19 discrimination under FEHA, and infringements of constitutional rights, as alleged herein.

20 213. As set forth above, Defendants have engaged in a pattern and practice of unlawful
21 conduct, including but not limited to: deliberating and reaching decisions outside of properly noticed
22 public meetings in violation of the Brown Act; engaging in deceptive and fraudulent campaign
23 tactics in violation of the Levine Act; targeting Plaintiffs and other GUHSD staff for protected
24 expression and opposing the Board’s unlawful conduct and political activity.

25 214. Unless enjoined by this Court, Defendants are likely to continue engaging in the same
26 or similar unlawful practices, causing ongoing and irreparable harm to Plaintiffs and to the public
27 interest in transparent, lawful, and nondiscriminatory governance of a public school district.

28

1 215. Plaintiffs have no adequate remedy at law to prevent Defendants’ ongoing and future
2 violations. Monetary damages alone cannot remedy the loss of constitutional rights, statutory
3 protections, transparency in public governance, or the chilling effect on protected expression.

4 216. Injunctive relief is necessary to ensure Defendants’ future compliance with the
5 Brown Act and Levine Act; to prevent further retaliation or discrimination against Plaintiffs and
6 others similarly situated; and to protect the constitutional and statutory rights implicated by
7 Defendants’ conduct.

8 217. Plaintiffs therefore seek preliminary and permanent injunctive relief, including but
9 not limited to orders requiring Defendants to: comply strictly with the open-meeting and anti-serial-
10 meeting requirements of the Brown Act; refrain from deliberating or reaching collective concurrence
11 on personnel or budgetary decisions outside of properly noticed public meetings; refrain from
12 fraudulent and deceptive campaign tactics; cease retaliatory or discriminatory practices based on
13 sexual orientation, gender identity, or protected expression; implement training for Board members
14 and District leadership regarding Brown Act compliance and anti-discrimination obligations; and
15 take all necessary steps to prevent future violations of Plaintiffs’ rights and the rights of other
16 GUHSD employees.

17 218. The requested injunctive relief is narrowly tailored to remedy Defendants’ unlawful
18 conduct, prevent its recurrence, and serve the public interest in lawful, transparent, and equitable
19 governance.

20 219. Plaintiffs are entitled to injunctive relief pursuant to Government Code §§54960 and
21 54960.1, the California Constitution, FEHA, and principles of equity.

22 220. Plaintiffs seek all further relief the Court deems just and proper, including
23 enforcement of the injunction and continuing jurisdiction to ensure compliance.

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TWELFTH CAUSE OF ACTION

**Failure to Maintain Employment Records in Violation of
Labor Code §§432 and 1198.5**

(Against GUHSD and DOES 1-25)

221. Plaintiffs hereby allege and incorporate by reference the allegations contained in the paragraphs above, as if fully set forth herein.

222. Pursuant to Labor Code §432, upon request an employer must give an employee a copy of any instrument signed by the employee relating to the obtaining or holding of employment. Any person violating this article is guilty of a misdemeanor. Lab. Code §433.

223. Additionally, pursuant to Labor Code §1198.5(a), every “current and former employee, or his or her representative, has the right to inspect and receive a copy of the personnel records that the employer maintains relating to the employee’s performance or to any grievance concerning the employee.” Lab. Code §1198.5(a). The employer shall make the contents of those personnel records available for inspection at a reasonable time, “but not later than 30 calendar days from the date the employer receives a written request.” Lab. Code §1198.5(b)(1).

224. An employee whose employer who fails to permit the employee to inspect or copy personnel records within the times specified by Labor Code §1198.5(b)(1) may recover a “penalty” of \$750 from the employer. Lab. Code §1198.5(k). An employee may also bring an action for injunctive relief to ensure compliance and is entitled to an award of costs and reasonable attorney’s fees. Lab. Code §1198.5(l).

225. On November 14, 2025, Plaintiffs requested in writing to inspect and copy their employment files and records. More than 30 days have elapsed, and GUHSD failed to comply with the requests in a timely manner or otherwise make the records available for inspection and copying. As such, GUHSD violated Labor Code §§ 432 and 1198.5,

226. Accordingly, pursuant to the above noted laws and Labor Code §§218, 218.5, and 218.6, Plaintiffs seek penalties, costs of suit, including reasonable attorneys’ fees, and interest.

1 **PRAYER**

2 WHEREFORE, Plaintiffs seek judgment as follows:

3 A. For compensatory damages, including unpaid wages (past and future), loss of wages
4 and benefits (past and future), and emotional distress damages (past and future) according to proof
5 at trial;

6 B. For civil penalties pursuant to Labor Code §§98.6(b)(3) and 1102.5(f) ;

7 C. For attorneys’ fees and costs of suit pursuant to Government Code §12965(c)(6),
8 Code of Civil Procedure §1021.5, Labor Code §§98.6(b)(1) and 1102.5(j), and any other applicable
9 provision for attorneys’ fees and costs;

10 D. For pre-judgment and post-judgment interest to the extent allowable by law;

11 E. For restitution and injunctive and declaratory relief; and

12 F. For an injunction restraining Defendants from continuing to engage in unlawful and
13 unfair practices; and

14 G. For such other and further relief as the Court deems just and proper.

15 **DEMAND FOR JURY TRIAL**

16 Plaintiffs demand a trial by jury on all claims.

17 Dated: April 8, 2026

HAEGGQUIST & ECK, LLP
ALREEN HAEGGQUIST (221858)
AARON M. OLSEN (259923)
ANNA C. SCHWARTZ (346268)

20
21 

22 By: _____
AARON M. OLSEN

23 225 Broadway, Suite 2050
24 San Diego, CA 92101
25 Telephone: (619) 342-8000
Facsimile: (619) 342-7878

26 Attorneys for Plaintiffs

HAEGGQUIST & ECK, LLP

EXHIBIT 1



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33959009
Right to Sue: Bachmann / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33959009

Right to Sue: Bachmann / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 9, 2026

Thea Bachmann
225 Broadway, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33959009
Right to Sue: Bachmann / Grossmont Union High School District et al.

Dear Thea Bachmann:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Thea Bachmann

CRD No. 202603-33959009

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Thea Bachmann**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
other things: banning books with LGBTQ content; terminating a long-standing relationship
with a mental health provider solely because it served LGBTQ youth; canceling professional
development programs that included LGBTQ-related materials; interfering with hiring
decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
adverse employment actions against staff who support LGBTQ students or challenge the
Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

1 action. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
3 Suzanne Sannwald, and Angela Scott (collectively, the "Librarians"). These Librarians
4 served GUHSD for a combined total of over 100 years of exemplary service. As professional
5 educators entrusted with managing school libraries and creating safe spaces for all
6 students, the Librarians were responsible under California law for providing students with
7 LGBTQ resources and diverse reading materials. They created welcoming environments
8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
15 orchestrated by the Anti-LGBTQ Board Members and their co-conspirators. Despite their
16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
18 meetings, suppression of efforts to establish a transparent and equitable book-approval
19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
reduction in force ("RIF") that eliminated all nine Teacher Librarian positions—dismantling
the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
Librarians but the entire school community. Students have lost access to credentialed library
professionals who provided research instruction, information literacy training, and safe
spaces for learning. Teachers have lost collaborative partners in curriculum development.
The LGBTQ community has been sent a clear message: you are not welcome here. This

1 case matters not only for the individual Librarians whose careers and livelihoods have been
2 destroyed, but for every public employee in California who dares to advocate for equality,
3 oppose discrimination, or defend the constitutional and statutory rights of students and staff
4 in our public schools.
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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33959409
Right to Sue: Balistreri / Grossmont Union High School District et al.

Dear Anna Schwartz:

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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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33959409

Right to Sue: Balistreri / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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March 9, 2026

Jason Balistreri
225 Broadway, # 2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33959409
Right to Sue: Balistreri / Grossmont Union High School District et al.

Dear Jason Balistreri:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Jason Balistreri

CRD No. 202603-33959409

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Jason Balistreri**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
other things: banning books with LGBTQ content; terminating a long-standing relationship
with a mental health provider solely because it served LGBTQ youth; canceling professional
development programs that included LGBTQ-related materials; interfering with hiring
decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
adverse employment actions against staff who support LGBTQ students or challenge the
Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

1 action. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
3 Suzanne Sannwald, and Angela Scott (collectively, the "Librarians"). These Librarians
4 served GUHSD for a combined total of over 100 years of exemplary service. As professional
5 educators entrusted with managing school libraries and creating safe spaces for all
6 students, the Librarians were responsible under California law for providing students with
7 LGBTQ resources and diverse reading materials. They created welcoming environments
8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
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16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
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19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
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the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
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were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
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professionals who provided research instruction, information literacy training, and safe
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The LGBTQ community has been sent a clear message: you are not welcome here. This

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4 in our public schools.
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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33959610
Right to Sue: Boeger / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33959610

Right to Sue: Boeger / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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March 9, 2026

Jodie Boeger
225 Broadway, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33959610
Right to Sue: Boeger / Grossmont Union High School District et al.

Dear Jodie Boeger:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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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 Jodie Boeger

CRD No. 202603-33959610

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Jodie Boeger**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
other things: banning books with LGBTQ content; terminating a long-standing relationship
with a mental health provider solely because it served LGBTQ youth; canceling professional
development programs that included LGBTQ-related materials; interfering with hiring
decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
adverse employment actions against staff who support LGBTQ students or challenge the
Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

1 action. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
3 Suzanne Sannwald, and Angela Scott (collectively, the "Librarians"). These Librarians
4 served GUHSD for a combined total of over 100 years of exemplary service. As professional
5 educators entrusted with managing school libraries and creating safe spaces for all
6 students, the Librarians were responsible under California law for providing students with
7 LGBTQ resources and diverse reading materials. They created welcoming environments
8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
15 orchestrated by the Anti-LGBTQ Board Members and their co-conspirators. Despite their
16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
18 meetings, suppression of efforts to establish a transparent and equitable book-approval
19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
reduction in force ("RIF") that eliminated all nine Teacher Librarian positions—dismantling
the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
Librarians but the entire school community. Students have lost access to credentialed library
professionals who provided research instruction, information literacy training, and safe
spaces for learning. Teachers have lost collaborative partners in curriculum development.
The LGBTQ community has been sent a clear message: you are not welcome here. This

1 case matters not only for the individual Librarians whose careers and livelihoods have been
2 destroyed, but for every public employee in California who dares to advocate for equality,
3 oppose discrimination, or defend the constitutional and statutory rights of students and staff
4 in our public schools.
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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33959810
Right to Sue: Jackson / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33959810

Right to Sue: Jackson / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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March 9, 2026

Tania Jackson
225 Broadway, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33959810
Right to Sue: Jackson / Grossmont Union High School District et al.

Dear Tania Jackson:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Tania Jackson

CRD No. 202603-33959810

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Tania Jackson**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
other things: banning books with LGBTQ content; terminating a long-standing relationship
with a mental health provider solely because it served LGBTQ youth; canceling professional
development programs that included LGBTQ-related materials; interfering with hiring
decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
adverse employment actions against staff who support LGBTQ students or challenge the
Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

1 action. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
3 Suzanne Sannwald, and Angela Scott (collectively, the "Librarians"). These Librarians
4 served GUHSD for a combined total of over 100 years of exemplary service. As professional
5 educators entrusted with managing school libraries and creating safe spaces for all
6 students, the Librarians were responsible under California law for providing students with
7 LGBTQ resources and diverse reading materials. They created welcoming environments
8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
15 orchestrated by the Anti-LGBTQ Board Members and their co-conspirators. Despite their
16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
18 meetings, suppression of efforts to establish a transparent and equitable book-approval
19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
reduction in force ("RIF") that eliminated all nine Teacher Librarian positions—dismantling
the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
Librarians but the entire school community. Students have lost access to credentialed library
professionals who provided research instruction, information literacy training, and safe
spaces for learning. Teachers have lost collaborative partners in curriculum development.
The LGBTQ community has been sent a clear message: you are not welcome here. This

1 case matters not only for the individual Librarians whose careers and livelihoods have been
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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: Notice to Complainant's Attorney
CRD Matter Number: 202603-33959910
Right to Sue: Macceca / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33959910

Right to Sue: Macceca / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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March 9, 2026

Stephanie Macceca
225 Broadway Circle, #2050
San Diego, CA 92020

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33959910
Right to Sue: Macceca / Grossmont Union High School District et al.

Dear Stephanie Macceca:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Stephanie Macceca

CRD No. 202603-33959910

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

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1. Respondent **Grossmont Union High School District** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming **Grossmont Union High School District Board of Trustees** business as Co-Respondent(s).

3. Complainant **Stephanie Macceca**, resides in the City of **San Diego**, State of **CA**.

4. Complainant alleges that on or about **December 1, 2025**, respondent took the following adverse actions:

Complainant was harassed because of complainant's religious creed - includes dress and grooming practices, gender identity or expression, sexual orientation, other, association with a member of a protected class.

Complainant was discriminated against because of complainant's religious creed - includes dress and grooming practices, gender identity or expression, sexual orientation, other, association with a member of a protected class and as a result of the discrimination was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
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8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
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11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
15 orchestrated by the Anti-LGBTQ Board Members and their co-conspirators. Despite their
16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
18 meetings, suppression of efforts to establish a transparent and equitable book-approval
19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
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24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
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26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
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the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
Librarians but the entire school community. Students have lost access to credentialed library
professionals who provided research instruction, information literacy training, and safe
spaces for learning. Teachers have lost collaborative partners in curriculum development.
The LGBTQ community has been sent a clear message: you are not welcome here. This

1 case matters not only for the individual Librarians whose careers and livelihoods have been
2 destroyed, but for every public employee in California who dares to advocate for equality,
3 oppose discrimination, or defend the constitutional and statutory rights of students and staff
4 in our public schools.
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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33960210
Right to Sue: O'Meara / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33960210

Right to Sue: O'Meara / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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**

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March 9, 2026

Chansamone O'Meara
225 Broadway, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33960210
Right to Sue: O'Meara / Grossmont Union High School District et al.

Dear Chansamone O'Meara:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Chansamone O'Meara

CRD No. 202603-33960210

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

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19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Chansamone O'Meara**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
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2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
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1 VERIFICATION

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6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: Notice to Complainant's Attorney

CRD Matter Number: 202603-33960410

Right to Sue: Sabell-Stoltz / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33960410

Right to Sue: Sabell-Stoltz / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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March 9, 2026

Nicole Sabell-Stoltz
225 Broadway, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue

CRD Matter Number: 202603-33960410

Right to Sue: Sabell-Stoltz / Grossmont Union High School District et al.

Dear Nicole Sabell-Stoltz:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Nicole Sabell-Stoltz

CRD No. 202603-33960410

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1. Respondent Grossmont Union High School District is an employer subject to suit under**
20 **the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).**

21 **2. Complainant is naming Grossmont Union High School District Board of Trustees**
22 **business as Co-Respondent(s).**

23 **3. Complainant Nicole Sabell-Stoltz, resides in the City of San Diego, State of CA.**

24 **4. Complainant alleges that on or about December 1, 2025, respondent took the**
25 **following adverse actions:**

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
other things: banning books with LGBTQ content; terminating a long-standing relationship
with a mental health provider solely because it served LGBTQ youth; canceling professional
development programs that included LGBTQ-related materials; interfering with hiring
decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
adverse employment actions against staff who support LGBTQ students or challenge the
Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

1 action. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
3 Suzanne Sannwald, and Angela Scott (collectively, the "Librarians"). These Librarians
4 served GUHSD for a combined total of over 100 years of exemplary service. As professional
5 educators entrusted with managing school libraries and creating safe spaces for all
6 students, the Librarians were responsible under California law for providing students with
7 LGBTQ resources and diverse reading materials. They created welcoming environments
8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
15 orchestrated by the Anti-LGBTQ Board Members and their co-conspirators. Despite their
16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
18 meetings, suppression of efforts to establish a transparent and equitable book-approval
19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
reduction in force ("RIF") that eliminated all nine Teacher Librarian positions—dismantling
the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
Librarians but the entire school community. Students have lost access to credentialed library
professionals who provided research instruction, information literacy training, and safe
spaces for learning. Teachers have lost collaborative partners in curriculum development.
The LGBTQ community has been sent a clear message: you are not welcome here. This

1 case matters not only for the individual Librarians whose careers and livelihoods have been
2 destroyed, but for every public employee in California who dares to advocate for equality,
3 oppose discrimination, or defend the constitutional and statutory rights of students and staff
4 in our public schools.
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1 VERIFICATION

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

5 On March 9, 2026, 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**

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Date Filed: March 9, 2026

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Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33960610
Right to Sue: Sannwald / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33960610

Right to Sue: Sannwald / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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March 9, 2026

Suzanne Sannwald
225 Broadway, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33960610
Right to Sue: Sannwald / Grossmont Union High School District et al.

Dear Suzanne Sannwald:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Suzanne Sannwald

CRD No. 202603-33960610

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Suzanne Sannwald**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
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was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

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4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
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8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
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public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
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decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
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Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

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7 LGBTQ resources and diverse reading materials. They created welcoming environments
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9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
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19 process, surveillance of their internet activity, threats of litigation, micromanagement of
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21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
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held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
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cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
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Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
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Librarians but the entire school community. Students have lost access to credentialed library
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The LGBTQ community has been sent a clear message: you are not welcome here. This

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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA



Civil Rights Department

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March 9, 2026

Anna Schwartz
Haeggquist & Eck, LLP, 225 Broadway, #2050
San Diego, CA 92101

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202603-33960810
Right to Sue: Scott / Grossmont Union High School District et al.

Dear Anna Schwartz:

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

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March 9, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202603-33960810

Right to Sue: Scott / Grossmont Union High School District 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

March 9, 2026

Angela Scott
225 Broadway Circle, #2050
San Diego, CA 92101

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202603-33960810
Right to Sue: Scott / Grossmont Union High School District et al.

Dear Angela Scott:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective March 9, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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 Angela Scott

CRD No. 202603-33960810

8 Complainant,

9 vs.

10 Grossmont Union High School District
11 1100 Murray Drive
12 El Cajon, CA 92020

13 Grossmont Union High School District Board of
14 Trustees
15 1100 Murray Drive
16 El Cajon, CA 92020

17 Respondents

18
19 **1.** Respondent **Grossmont Union High School District** is an **employer** subject to suit under
20 the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

21 **2.** Complainant is naming **Grossmont Union High School District Board of Trustees**
22 business as Co-Respondent(s).

23 **3.** Complainant **Angela Scott**, resides in the City of **San Diego**, State of **CA**.

24 **4.** Complainant alleges that on or about **December 1, 2025**, respondent took the
25 following adverse actions:

26 **Complainant was harassed** because of complainant's religious creed - includes dress and
27 grooming practices, gender identity or expression, sexual orientation, other, association with
28 a member of a protected class.

Complainant was discriminated against because of complainant's religious creed -
includes dress and grooming practices, gender identity or expression, sexual orientation,
other, association with a member of a protected class and as a result of the discrimination
was terminated, laid off, denied hire or promotion, reprimanded, demoted, denied any

1 employment benefit or privilege, other, denied work opportunities or assignments, denied or
2 forced to transfer.

3 **Complainant experienced retaliation** because complainant reported or resisted any form
4 of discrimination or harassment, participated as a witness in a discrimination or harassment
5 complaint and as a result was terminated, laid off, denied hire or promotion, reprimanded,
6 demoted, denied any employment benefit or privilege, other, denied work opportunities or
7 assignments, denied or forced to transfer.

8 **Additional Complaint Details:** School board elections, once considered minor ballot races
9 by voters, have taken on new significance in recent years. Across the country, extreme
10 conservative and religious action groups have targeted local school board races to seize
11 control of public education systems. Their objective is explicit: to dismantle diversity, equity,
12 and inclusion (“DEI”) initiatives and replace secular, inclusive curricula with ideologically
13 driven agendas hostile to LGBTQ communities. This fringe movement has become so
14 pervasive and harmful that, on September 25, 2023, California’s Governor signed into law
15 Assembly Bill (“AB”) 1078, prohibiting school boards from banning books based on LGBTQ
16 content and affirmatively requiring school districts to foster equitable learning environments
17 in which all students and staff—including LGBTQ individuals—are welcomed and protected.
18 That same anti-diversity movement has taken hold in San Diego County and embedded
19 itself within GUHSD’s School Board. Four Board members—Dr. Gary Woods, Jim Kelly,
20 Robert Shield, and Scott Eckert (the “Anti-LGBTQ Board Members”)—now control the five-
21 member Board. Each of these Board members is a white male with deeply held Christian
22 beliefs that are opposed to diversity and LGBTQ inclusion in public education. They are
23 staunch believers in and vocal advocates of “East County Values,” which they have
24 unequivocally defined as being anti-LGBTQ and “anti-woke.” Meaning, even though
25 California has clear anti-discrimination laws, the majority board members believe they are
26 above the law and can impose a Christian, anti-LGBTQ agenda in a public school system on
27 GUHSD’s students and staff. As discussed below, the Anti-LGBTQ Board Members did not
28 act alone. With the assistance of their co-conspirators—including their private attorney, John
Wayne Howard (“Mr. Howard”), and his former paralegal turned district administrator, Jerry
Hobbs (“Mr. Hobbs”)—they engaged in deceptive and fraudulent schemes to manipulate
elections, mislead voters, and unlawfully obtain and retain control of the GUHSD Board.
Once in power, the Anti-LGBTQ Board Members made their discriminatory agenda
unmistakably clear. They have unashamedly displayed their anti-LGBTQ views in open
public board meeting sessions and in internal text messages and emails later revealed
through media reporting. In direct violation of California anti-discrimination laws, the
Education Code, and GUHSD’s own policies, they launched a coordinated campaign to
purge the District of LGBTQ-allyship programs and personnel. Their actions include, among
other things: banning books with LGBTQ content; terminating a long-standing relationship
with a mental health provider solely because it served LGBTQ youth; canceling professional
development programs that included LGBTQ-related materials; interfering with hiring
decisions to exclude candidates perceived as “woke” or LGBTQ-supportive; and taking
adverse employment actions against staff who support LGBTQ students or challenge the
Board’s campaign to eradicate DEI from the District, including the nine Plaintiffs in this

1 action. Plaintiffs are nine Teacher Librarians: Thea Bachmann, Jason Balistreri, Jodie
2 Boeger, Tania Jackson, Stephanie Macceca, Chansamone O'Meara, Nicole SaBell-Stoltz,
3 Suzanne Sannwald, and Angela Scott (collectively, the "Librarians"). These Librarians
4 served GUHSD for a combined total of over 100 years of exemplary service. As professional
5 educators entrusted with managing school libraries and creating safe spaces for all
6 students, the Librarians were responsible under California law for providing students with
7 LGBTQ resources and diverse reading materials. They created welcoming environments
8 where LGBTQ students and staff felt safe and supported. They posted "All Are Welcome
9 Here" signs in their libraries, wore ally badges, and publicly advocated for LGBTQ resources
10 and initiatives. They opposed the Board's book censorship efforts, defended intellectual
11 freedom, and spoke at board meetings against discriminatory policies. In short, they
12 embodied the very values that California law mandates and that the Anti-LGBTQ Board
13 Members sought to dismantle. Because of this, the Librarians became targets of a
14 coordinated campaign of harassment, discrimination, retaliation, and ideological persecution
15 orchestrated by the Anti-LGBTQ Board Members and their co-conspirators. Despite their
16 outstanding performance records and critical role in student learning, the Librarians were
17 subjected to escalating adverse actions, including: refusal to hear their concerns at Board
18 meetings, suppression of efforts to establish a transparent and equitable book-approval
19 process, surveillance of their internet activity, threats of litigation, micromanagement of
20 library purchasing decisions, unwarranted disciplinary actions, and systematic efforts to
21 undermine their professional authority. Internal communications revealed through California
22 Public Records Act ("CPRA") requests show the Anti-LGBTQ Board Members and their co-
23 conspirators discussing plans to "end DEI," "micromanage library purchases," "freeze all
24 library funds," and target the Librarians who purchased "woke books" or supported LGBTQ
25 students. In other words, the District's adverse actions against the Librarians were motivated
26 by explicit animus toward LGBTQ individuals and their advocates, and by hostility toward
27 perceived "progressive," "woke," and "DEI" viewpoints. The discriminatory campaign
28 culminated on February 27, 2025, when the Anti-LGBTQ Board Members approved a
reduction in force ("RIF") that eliminated all nine Teacher Librarian positions—dismantling
the entire librarian program. This action was not driven by budgetary necessity. GUHSD
held more than \$100 million in reserves, including over \$46 million available for
emergencies. At the same time it claimed fiscal crisis, the Board created new, high-paying
administrative positions for its allies, including a \$187,000 Chief of Staff role for Mr. Hobbs.
The elimination of Plaintiffs' positions was pretextual, discriminatory, and retaliatory—
intended to punish the Librarians for their LGBTQ advocacy. Following the RIF, Plaintiffs
were involuntarily reassigned to classroom teaching positions, resulting in substantial pay
cuts, loss of professional status, and a hostile work environment that continues to this day.
This case is not an isolated incident. The targeting of the Librarians follows a documented
pattern of discrimination at GUHSD, including the constructive discharge of former Director
of Special Education Rose Tagnesi—a lesbian woman subjected to sham investigations by
Mr. Howard and Mr. Hobbs and forced out after advocating for LGBTQ staff and students.
The cumulative effect of GUHSD's hostile work environment has harmed not only these nine
Librarians but the entire school community. Students have lost access to credentialed library
professionals who provided research instruction, information literacy training, and safe
spaces for learning. Teachers have lost collaborative partners in curriculum development.
The LGBTQ community has been sent a clear message: you are not welcome here. This

1 case matters not only for the individual Librarians whose careers and livelihoods have been
2 destroyed, but for every public employee in California who dares to advocate for equality,
3 oppose discrimination, or defend the constitutional and statutory rights of students and staff
4 in our public schools.
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1 VERIFICATION

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

6 On March 9, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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San Diego, CA