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Nocona Soboleski, Clerk of Court
Superior Court of the State of California
County of Kings


Candy Ochoa Deputy

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF KINGS**

17 ROBERT WAGGLE, an Individual

18 Plaintiff,

19 vs.

20 COUNTY OF KINGS, an entity of unknown
21 origin; and DOES 1 - 50, Inclusive,

22 Defendants.

CASE NO.: 21C-0282

**PLAINTIFF ROBERT WAGGLE'S
COMPLAINT FOR:**

- (1) HARASSMENT (HOSTILE WORK ENVIRONMENT) IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT;**
- (2) HARASSMENT (QUID PRO QUO) IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT;**
- (3) RETALIATION IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT;**
- (4) FAILURE TO TAKE CORRECTIVE ACTION IN VIOLATION OF FEHA**
- REQUEST FOR JURY TRIAL; AND**
- (5) VIOLATION OF LABOR CODE §1102.5**

REQUEST FOR JURY TRIAL

23 Plaintiff Robert Waggle ("Plaintiff"), with knowledge as to his own acts and based upon information
24 and belief with regard to all other matters, by and through his attorneys of record, alleges as follows:
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1 1. Plaintiff is an individual who, at all times relevant herein, resided within the County of Kings,
2 State of California and was employed by Defendant County of Kings (“County” or “Defendant”) at
3 Defendant’s business office(s) located in the County of Kings, State of California.
4

5 2. Plaintiff alleges that Defendant is a municipality doing business in the County of Kings, State
6 of California. The Kings County Board of Supervisors, as the governing body of the City of Kings, acts,
7 represents, and implements policy on the behalf of Defendant.
8

9 3. Defendants County and DOE Defendants 1 through 50 are hereinafter sometimes collectively
10 referred to as “Defendants”.

11 4. On or about July 6, 2020, Plaintiff exhausted his administrative remedies by: (1) filing and
12 serving a Government Claim [which referenced his concurrently-filed Department of Fair Employment and
13 Housing (“DFEH”) claim] against Defendant which was denied by operation of law; and (2) filing a
14 Complaint with the DFEH and thereafter serving the resulting “Right to Sue” on Defendant
15

16 5. Plaintiff is presently not aware of the true names and/or capacities of defendants DOES 1
17 through 50, inclusive, and therefore sues said defendants by such fictitious names. Plaintiff is informed and
18 believes and upon such information and belief alleges that said fictitiously named defendants are directly
19 and proximately responsible for the injuries and damages alleged herein. Plaintiff will amend this Complaint
20 to allege the true names and capacities of said fictitiously named defendants when, and if, ascertained.
21

22 6. Plaintiff is informed and believes and upon such information and belief alleges that at all
23 relevant times each and every Defendant was a principle, agent, employer, employee, manager, supervisor,
24 officer, shareholder and/or owner of each and every other Defendant, and each and every act and/or omission
25 of each and every Defendant occurred by and through the owner of the Defendant and within the course and
26 scope of such agency and/or employment and/or was approved and/or ratified by the acts and/or omissions
27 of each and every other Defendant.
28

1 7. As set forth herein in detail, Defendant’s harassment and retaliation against and constructive
2 termination of Plaintiff violates California law and Defendant’s own policies and procedures, as well as
3 Plaintiff’s civil service rights.
4

5 **FACTUAL BACKGROUND**

6 **A. Plaintiff was a Long-Term Exemplary Employee with Defendant.**

7 8. By way of brief background, in 2003, Plaintiff - a heterosexual male - was hired as a Deputy
8 Sheriff by the Kings County Sheriff’s Office after graduating from the Fresno City College police academy
9 at the top of his class. Plaintiff earned his B.S. Degree from California State University Fresno and
10 eventually obtained his M.B.A. from Brandman University. Plaintiff was an excellent employee and
11 promoted quickly. In 2010, when Plaintiff held the rank of Senior Deputy Sheriff, he transferred to the
12 District Attorney’s Office (“DA”) as a DA Investigator.
13
14

15 9. Once at the DA’s Office, Plaintiff was promoted to Senior Investigator and eventually to
16 Chief Investigator. Plaintiff is currently a licensed private investigator with significant training/experience
17 in criminal investigation and computer forensics and is a part time college professor teaching Administration
18 of Justice and Computer Information Systems.
19

20 10. Throughout his 17-year career with the County, Plaintiff consistently received excellent
21 performance reviews and merit-based salary increases.
22

23 **B. Defendant and Fagundes.**

24 11. In 2014, Keith Fagundes (“Fagundes”) was elected as District Attorney.

25 12. When Fagundes took office, the then-Chief Investigator and the then-Assistant Chief
26 Investigator chose to leave the office.
27

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1 **C. Plaintiff was Promoted by Fagundes and then Offered a Residence with**
2 **“Strings” Attached.**

3
4 13. In July of 2015, Plaintiff was promoted to Chief Investigator and Plaintiff then filled the other
5 vacancies with in-house personnel.

6 14. In 2018, when Plaintiff was in the process of a divorce, Fagundes offered Plaintiff the
7 apartment next door to Fagundes’ home.

8
9 15. Plaintiff repeatedly offered to pay Fagundes for the apartment but Fagundes refused to accept
10 payment, stating instead that: “You [Plaintiff] just being here is enough for me.”

11 16. While Plaintiff was initially thankful for this assistance, Plaintiff was unaware of the “strings”
12 that would be attached to this situation.

13
14 **D. Fagundes Sexually Harassed Plaintiff.**

15 17. During this time period, Plaintiff began dating Fagundes’ secretary, Alexandria Smith. The
16 three often socialized together. However, Fagundes (Plaintiff’s direct supervisor) began to repeatedly make
17 comments that Plaintiff’s relationship with Ms. Smith was causing Fagundes “angst” as it was taking away
18 from “Keith time.”

19
20 18. Fagundes began to repeatedly and inappropriately make unwanted sexual remarks to Plaintiff
21 and began to send Plaintiff numerous unsolicited sexual comments, innuendos, memes and photographs.
22 (Despite Fagundes’ requests/demands that Plaintiff delete these messages, Plaintiff has saved
23 approximately 5,000 text messages from Fagundes.)

24
25 19. The below are some examples (of many) of Fagundes’ (Plaintiff’s direct supervisor’s)
26 extended pattern and practice of improper and unlawful sexual harassment:

- 27
28
- Fagundes repeatedly made sexual comments regarding Plaintiff’s body and clothing (and, eventually, Fagundes purchased the exact same articles of clothing that Plaintiff wore);
 - Fagundes repeatedly touched Plaintiff in a sexual manner;

- 1 • Fagundes repeatedly blatantly stared at Plaintiff’s crotch;
- 2 • Fagundes repeatedly initiated conversations about sex (i.e., comparing the imagined size of
- 3 Plaintiff’s penis to various objects and stating: “Wow, I just can’t get it out of my mind” or
- 4 “Wow! I’m impressed!”);
- 5 • Fagundes texted Plaintiff a photo of a statue of a man with a broken tennis racquet with a
- 6 caption: “When the racquet on your tennis trophy breaks and now it looks like you won an
- 7 award for masturbation”, beneath which Fagundes wrote: “Why did I think of you when I
- 8 saw this????”;
- 9 • Fagundes visited a horse ranch and sent Plaintiff a photo of a male horse with its penis
- 10 partially exposed and texted: “We are at this horse therapy place. The instructor told us to
- 11 pick a horse that reminds us of ourselves. I chose this one”;
- 12 • Fagundes texted Plaintiff a picture of an ad that stated: “Massage - 60 minute massage
- 13 includes head \$20” under which Fagundes had written: “You’re the only person I could share
- 14 it with . . . who won’t judge me any further”;
- 15 • Plaintiff texted Fagundes that a delivery package had arrived for Fagundes and Fagundes
- 16 responded that he wanted to “cum over and see it”;
- 17 • Fagundes repeatedly discussed eating pineapples with Plaintiff because Fagundes stated that
- 18 eating pineapple would make male ejaculation (“cum”) taste sweeter and sent Plaintiff texts
- 19 which referred to pineapples (i.e., a photo of Dole pineapple juice, a photo of pineapple with
- 20 white sauce beside it);
- 21 • Fagundes repeatedly raised the subject of cum with Plaintiff (i.e., “Do you like how cum
- 22 tastes?”, “Cum doesn’t taste too bad”) and stated that he enjoyed performing oral sex on his
- 23 wife after he ejaculated inside her so that he could taste it;
- 24 • Fagundes repeatedly discussed his sex life with Plaintiff (i.e., “My sex life is so much better
- 25 now that you live here”) and “credited” Plaintiff with this improvement;
- 26 • Fagundes repeatedly asked Plaintiff’s girlfriend Ms. Smith about her sexual relationship with
- 27 Plaintiff (i.e., what Plaintiff positions Plaintiff preferred during sexual intercourse with her)
- 28 and inquired into whether the two of them had ever engaged in anal intercourse;
- Fagundes told Plaintiff that Fagundes had attempted to have anal intercourse with his wife but that she was unwilling/uninterested;
- Fagundes sent text messages with improper emojis (i.e., kissing faces, kissing lips) and then requested that Plaintiff delete the texts (which a photo of texts to be deleted);
- Fagundes texted Plaintiff about swimming nude and about taking a shower afterwards;

- 1 • Fagundes asked Plaintiff about masturbating (i.e., how often and when), referred to
- 2 Plaintiff's apartment as the "masturbatorium" and inquired into whether Fagundes could use
- 3 Plaintiff's apartment to masturbate when Plaintiff was not home;
- 4 • Fagundes purchased underwear for Plaintiff as a "gift";
- 5 • Fagundes asked Plaintiff about "good" pornography sites and stated that he had
- 6 "inadvertantly" clicked on homosexual pornography sites;
- 7 • Fagundes told Plaintiff that he "loved" him; and
- 8 • Eventually, in November of 2019, Plaintiff was able to move out of Fagundes' apartment.
- 9 When Plaintiff was moving into his new home, Fagundes came over and, when touring the
- 10 house, Fagundes looked at the area where the bed would be placed in the master bedroom
- 11 and stated: "I am going to imprint on you right now. I want you to envision me standing her
- 12 while you are fucking Alex."

13 20. All of Fagundes' highly improper acts and communications caused Plaintiff to feel extremely

14 uncomfortable, abused and traumatized.

15 21. As Fagundes continued to act improperly (despite Plaintiff's many requests for Fagundes to

16 stop), Plaintiff felt increasingly helpless and hopeless.

17 22. Indeed, when Plaintiff did attempt to set boundaries (or simply did not respond or said he was

18 "busy"), Fagundes reacted negatively.

19 23. While Plaintiff would have known how to react had these improper actions come from

20 anyone other than Plaintiff's direct supervisor, Plaintiff felt powerless as a result of Fagundes' actual control

21 over Plaintiff.

22 24. Additionally, Fagundes often mentioned his "blackmail folders" that he maintains on

23 "everybody", including Plaintiff.

24 25. Based on Fagundes prior behavior (trying to politically destroy anyone who

25 questioned/opposed him), Plaintiff justifiably feared retaliation. (Additionally, Fagundes' father is a member

26 of the County Board of Supervisors.)

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1 26. Plaintiff was well aware that any repudiation/complaints of Fagundes' actions would also
2 result in severe retaliation from Fagundes.

3
4 **E. Fagundes Retaliated Against Plaintiff.**

5 27. In any event, Fagundes expressed anger that Plaintiff had moved out of Fagundes' apartment
6 and in with Ms. Smith.

7 28. At this time, Plaintiff and Fagundes' relationship began to deteriorate.

8 29. At the office, Fagundes began to retaliate against Plaintiff by, *inter alia*, continually
9 ostracizing him, ignoring/excluding him, attempting to micro-manage him and by violating the chain of
10 command.

11 30. Fagundes began to have private meetings with Plaintiff's subordinates and fail to include
12 Plaintiff in on the information discussed.

13 31. Fagundes slowly stripped Plaintiff of his responsibilities/abilities to the point Plaintiff had
14 a difficult time performing his job.

15 32. When Plaintiff requested to meet with Fagundes regarding Fagundes' expectations moving
16 forward, Fagundes responded: "I don't know what that looks like. We wouldn't be having this conversation
17 if it was a few years ago."

18 33. Plaintiff felt sick as if Fagundes was attempting to force him back into some type of personal
19 relationship.

20
21 **F. Plaintiff Disclosed Defendant's Unlawful Conduct.**

22 34. Then, in or about February/March of 2021, serious allegations were made regarding a sitting
23 member of the County Board of Supervisors.

24 35. County Counsel Lee Burdick arranged for an outside law firm to investigate these allegations.

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1 36. County Counsel then requested that the Attorney General become involved. However, the
2 Attorney General stated that, unless the District Attorney conflicted out, they would not become involved.

3
4 37. Plaintiff confronted Fagundes and stated that a conflict clearly existed and that the District
5 Attorney’s office should not be conducting the investigation.

6 38. Despite this conflict, Fagundes refused to conflict out and proceeded to assign the
7 investigation to Plaintiff’s subordinate.

8
9 39. Fagundes then altered the direction of the investigation to focus not on the County Supervisor
10 but on women County executives for supposed collusion.

11 40. During this meeting, Plaintiff again stated that the District Attorneys’ office should not be
12 conducting this investigation as Fagundes had personal animosities towards not only these particular women
13 but to women in power in general.

14
15 41. Fagundes wanted to send a message to these women that he - and not them - has the power
16 and control.

17 **G. Fagundes Again Retaliated Against Plaintiff.**

18
19 42. In March of 2021, Plaintiff requested a voluntary demotion to the vacant position of
20 “Computer Forensics Specialist” for which Plaintiff indisputably met all qualifications.

21 43. Fagundes denied Plaintiff’s request by smirking, tilting his head and stating: “It’s not good
22 for the office. If I did allow it, it would have only been because of our personal relationship, and that’s not
23 there.”

24
25 44. Thus, Fagundes made clear that his denial of a work benefit to Plaintiff was a result of
26 Plaintiff’s refusal to remain in the personal relationship demanded by Fagundes (i.e., a *quid pro quo*).

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1 **H. As a Result of Defendant’s Unlawful Conduct, Plaintiff Suffered Damage.**

2 45. Throughout this recent time period, Plaintiff reported Fagundes’ various improper/illegal acts
3 to, *inter alia*, the County Counsel and the County’s Risk Manager.
4

5 46. As a result of Fagundes’ improper/illegal acts, Plaintiff began to suffer severe anxiety, panic
6 attacks and other physical/psychological ailments and was diagnosed by the County’s own Qualified Medical
7 Examiner with Post Traumatic Stress Disorder and Panic Disorder, directly resulting from Fagundes’
8 actions.
9

10 47. On March 24, 2021, due to the severity of Claimant’s distress, Claimant was placed on
11 FMLA leave.

12 48. On July 8, 2021, as a result of Defendant’s actions, Plaintiff was forced to take an Industrial
13 Disability Retirement (i.e., constructively terminated.)
14

15 **FIRST CAUSE OF ACTION**

16 **HARASSMENT (HOSTILE WORK ENVIRONMENT)**

17 **IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT**

18 **(Against All DEFENDANTS)**

19
20 49. Plaintiff realleges Paragraphs 1 through 48 above and incorporates same as though fully set
21 forth herein.

22 50. Plaintiff was an employee of Defendant.

23 51. As set forth above, Plaintiff was subjected to severe and/or pervasive harassment which
24 created a work environment that was hostile, intimidating, offensive, oppressive and/or abusive.
25 Additionally, a reasonable man in Plaintiff’s circumstances would have considered the work environment
26 to be hostile, intimidating, offensive, oppressive, or abusive.
27

28 52. The above-referenced conduct was engaged in by Plaintiff’s direct supervisor.

1 53. As a result, Plaintiff was harmed and Defendant's conduct was a substantial factor in causing
2 Plaintiff's harm.

3
4 54. As a direct and legal result of the harassment, Plaintiff suffered harm and injury that was
5 legally (proximately) caused by the conduct of Defendants. Said harm and injury includes, but is not limited
6 to, special (economic) damages, general (non-economic) damages, attorneys' fees [per *Government Code*
7 §12965(b)], litigation costs, future damages and past damages, lost economic earning capacity in future
8 employment endeavors and such further relief as shown at the time of Trial and in excess of the minimal
9 jurisdictional of this Court.
10

11 **SECOND CAUSE OF ACTION**

12 **HARASSMENT (QUID PRO QUO)**

13 **IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT**

14 **(Against All DEFENDANTS)**

15
16 55. Plaintiff realleges Paragraphs 1 through 54 above and incorporates same as though fully set
17 forth herein.

18 56. Plaintiff was an employee of Defendant.

19
20 57. As set forth in detail above, Fagundes made unwanted sexual advances to Plaintiff and/or
21 engaged in other unwanted verbal and/or physical conduct of a sexual nature.

22
23 58. The terms of employment, job benefits, or favorable working conditions were made
24 contingent, by words or by conduct, on Plaintiff's acceptance of Fagundes' sexual advances and/or conduct.

25 59. At the time of Fagundes' conduct, Fagundes was a supervisor or agent for Defendant.

26
27 60. As a result, Plaintiff was harmed and Defendant's conduct was a substantial factor in causing
28 Plaintiff's harm.

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1 71. As a direct and legal result of the retaliation Plaintiff, Plaintiff suffered harm and injury that
2 was legally (proximately) caused by the conduct of Defendant. Said harm and injury includes, but is not
3 limited to, special (economic) damages, general (non-economic) damages, attorneys' fees [per *Government*
4 *Code* §12965(b)], litigation costs, future damages and past damages, lost economic earning capacity in future
5 employment endeavors and such further relief as shown at the time of Trial and in excess of the minimal
6 jurisdictional of this Court.
7

8
9 **FIFTH CAUSE OF ACTION**
10 **VIOLATION OF LABOR CODE §1102.5**
11 **(Against All DEFENDANTS)**

12 72. Plaintiff realleges Paragraphs 1 through 71 above and incorporates same as though fully set
13 forth herein.
14

15 73. Plaintiff, as described more fully above, disclosed to a government agency and/or law
16 enforcement agency and/or a person with authority over him or to an employee with authority to investigate,
17 discover, or correct legal violations and/or noncompliance to Defendant. Plaintiff had reasonable cause to
18 believe that the information disclosed a violation of state, or federal statute and/or a violation of and/or
19 noncompliance with a local, state and/or federal rule and/or regulation [i.e., *Penal Code* §1181 (prosecutorial
20 misconduct); *Penal Code* §§135, 141 (evidence tampering); *Penal Code* §424 (misuse of government
21 funds); *Penal Code* §518 (extortion); *Penal Code* §115 (falsification of documents); *Penal Code* §136.1
22 (victim dissuasion) *Government Code* §§3060-3074 (misconduct of local officials); *Government Code*
23 §53243-53244 (abuse of office); *Kings County Policies and Procedures* (i.e., Employer-Employee Relations
24 Policy, Nepotism Policy, Personnel Rules, Sexual Harassment Policy, Workplace Bullying Policy); and
25 *Government Code* §§12940, et seq. (Fair Employment and Housing Act).]
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1 74. For sake of example (and there are many), in addition to the facts set forth above regarding
2 Fagundes' violation of the Fair Employment and Housing Act:

- 3 • Fagundes has tampered with evidence in a criminal jury trial in an attempt to obtain a guilty
4 verdict;
- 5 • Fagundes has abused his prosecutorial discretion by interfering in criminal prosecutions and
6 has manipulated cases to either be unfairly tough on defendants where he has a personal
7 relationship with the victims or, conversely, to be unfairly lenient on defendants with whom
8 he also has relationships;
- 9 • Fagundes has admittedly maintained "blackmail folders" on many (i.e., Fagundes has
10 preserved an emotionally charged and aggressive voicemail from one of the County
11 Supervisors within the Board of Supervisors, as potential blackmail, in the event Fagundes
12 needed to use it; Fagundes has also preserved an aggressive voicemail of a former female
13 employee that had been harassed by him while she was employed for the District Attorney's
14 Office);
- 15 • Fagundes has arbitrarily utilized resources within his control at the District Attorney's Office,
16 for acquaintances or friends (such as the Bureau of Investigations) to bypass the appropriate
17 protocol for investigations that should be conducted by other law enforcement agencies;
- 18 • Fagundes improperly became involved in criminal cases in which his wife, Renea Fagundes,
19 might potentially be a witness (due to her position as Principal of a local public school) and
20 has otherwise improperly influenced these cases by pressuring the Deputy District Attorneys
21 to handle them in a certain ways;
- 22 • Fagundes has used government funding to directly benefit his immediate family members
23 in their private businesses and has often influenced decisions compelling employees to send
24 business to his family members with government funds;
- 25 • Fagundes has a close relationship with his fiscal analyst which allows for "creative funding"
26 which Fagundes has often used to influence/gain compliance from his employees by
27 permitting the purchase of unnecessary equipment and luxuries using government funding,
28 including the use of government equipment such as take-home vehicles, cellular phones, and
other conveniences, for personal use;
- Fagundes has knowingly submitted inaccurate information on official documents submitted
to the State of California and the Department of Justice, in order to gain approval for the case
management system used by the Kings County District Attorney's Office to act as a
repository for sensitive law enforcement information accessed through the California Law
Enforcement Telecommunications System (CLETS);

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- 1 • Fagundes has frequently violated the rules and practices set forth in the County’s Personnel
- 2 Rules which has caused further issues for Human Resources and additional liability for the
- 3 County;
- 4 • Fagundes has often referred to women whom he does not like as “cunts” and “bitches”;
- 5 • On numerous occasions, Fagundes failed to comply with established County Policies with
- 6 regards to the hiring of employees (i.e., Fagundes hired an employee - against the advice of
- 7 Human Resources - following a failed drug test; Fagundes attempted to circumvent the
- 8 system by claiming to pay the employee out of his “discretionary” fund account);
- 9 • Prior to being the District Attorney (when Fagundes had been placed in a supervisory
- 10 position), Fagundes harassed multiple subordinates and demonstrated a propensity to
- 11 breaking the rules to always get his way;
- 12 • Fagundes has failed to act on multiple occasions to hold employees accountable for
- 13 inappropriate and offensive conduct occurring in his presence and in front of other
- 14 employees, failed to act on reported inappropriate conduct/bullying of employees, and failed
- 15 to recommend that internal affairs investigations be initiated to resolve matters;
- 16 • Fagundes violated County Policies by personally conducting unauthorized construction
- 17 within the District Attorney’s Office, further violating building codes and regulations,
- 18 resulting in the exposure of employees to safety issues, and compelling the County to rectify
- 19 his mistakes by hiring licensed contractors to repair the work; and
- 20 • Fagundes created a parking spot by painting lines on the ground - believing he was legally
- 21 justified to do so.

22 75. In response to the disclosures and complaints initiated by Plaintiff, Defendant failed to timely
 23 and thoroughly investigate and/or properly respond to same and, to the contrary, humiliated, degraded,
 24 retaliated against and constructively terminated Plaintiff as more fully described above.

25 76. Defendants’ treatment of and response to the disclosures, complaints and grievances filed by
 26 Plaintiff was in violation of *Labor Code* §1102.5.

27 77. Plaintiff’s disclosure of information was a contributing factor in his constructive termination.

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1 78. As a proximate result of Defendant’s actions as alleged above, Plaintiff has been harmed by
2 the loss of the wages, salary, income, benefits and additional amounts Plaintiff would have received if he
3 had not been constructively terminated by Defendant. As a result of such actions and consequent harm,
4 Plaintiff has suffered such damages as according to proof.
5

6 79. In addition to the damages sought above, as a proximate result of Defendants’ actions as
7 alleged above, Plaintiff will also seek backpay and benefits, actual damages and a civil penalty. *Labor Code*
8 §§98.6(b), §1105, 1102.5(f).
9

10 80. As a direct and proximate result of the above-described acts of Defendants, Plaintiff has
11 necessarily incurred attorney’s fees and costs and Plaintiff is entitled to the reasonable value of such
12 attorney’s fees and costs pursuant to *Labor Code* §1102.5, Assembly Bill 1947 and *Code of Civil*
13 *Procedure* §1021.5.
14

15
16 WHEREFORE, Plaintiff prays for Judgment against Defendants, and each of them, as follows:

- 17 1. For compensatory damages, including loss of earnings, income and benefits, deferred
18 compensation, bonuses, vacation and other employment perquisites and other special and general damages
19 according to proof;
20
21 2. Damages for pain and suffering and emotional distress;
22
23 3. Interest, including pre-judgment interest, at the prevailing legal rate;
24
25 4. Attorneys’ fees and costs incurred herein; and
26
27 5. Costs of suit and such further and other relief as the Court deems just and proper.
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REQUEST FOR TRIAL BY JURY

Plaintiff hereby demands a Trial by Jury.

DATED: September 8, 2021

LAW OFFICE OF LAWRENCE J. LENNEMANN

By: Lawrence J. Lennemann
LAWRENCE J. LENNEMANN
Attorneys for Plaintiff ROBERT WAGGLE

Electronically filed by Superior Court of California, County of Kings, 9/9/2021 9:56 AM, Candy Ochoa

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