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10 MICHAEL MOLIERI

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 IN AND FOR THE COUNTY OF SAN MATEO
13 UNLIMITED JURISDICTION

14 MICHAEL MOLIERI,

15 Plaintiff,

16 v.

17 SEQUOIA UNION HIGH SCHOOL
18 DISTRICT; CRYSTAL LEACH; TODD BEAL;
19 BONNIE HANSEN; and DOES 1-100 inclusive,

20 Defendants.

21 25-CIV-08733

22 CASE NO.

23 **COMPLAINT FOR DAMAGES**

24 **1st Cause of Action: Race Discrimination (Gov. Code §12940(a))**

25 **2nd Cause of Action: Age Discrimination (Gov. Code §12940(a))**

26 **3rd Cause of Action: Retaliation (Gov. Code §12940(h))**

27 **4th Cause of Action: Retaliation (Lab. Code §1102.5)**

28 **JURY TRIAL DEMANDED**

29 Plaintiff MICHAEL MOLIERI, hereby alleges against Defendants SEQUOIA UNION HIGH
30 SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and DOES 1-100
31 inclusive, and each of them as follows:

32 **SUMMARY OF COMPLAINT**

33 1. Plaintiff MICHAEL MOLIERI was discriminated against by Defendants SEQUOIA
34 UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and
35 DOES 1-100 inclusive, ("Defendants") and each of them, due to his national origin, age (59 years old) and
36 in retaliation for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as

1 amended, and the Age Discrimination in Employment Act of 1967, as amended.

2 2. The circumstances presented herein appear to be indicative of a pattern and practice of
3 improper activity within the Sequoia Union High School District. It is believed that there are other
4 situations wherein Sequoia Union High School District personnel have, and continue to, purposefully
5 violate its own policies as it relates to nondiscrimination, reasonable accommodation, fair investigation of
6 employee complaints, uniform complaint procedures, and board approval for engagement of consultants
7 to employee matters.

8 3. Although Plaintiff MICHAEL MOLIERI reported his concerns regarding his good faith
9 and reasonable belief that improper, unethical and illegal actions were occurring at the direction of Sequoia
10 Union High School District employees, including, but not limited to, administrators, managers, board
11 members, etc., directly to the Sequoia Union High School District, none of these persons took action to
12 correct these violations. Instead, he was retaliated against when he was placed on administrative leave from
13 his employment with the Sequoia Union High School District and was stripped of his position as coach
14 for the Menlo Atherton High School at the direction of the Sequoia Union High School District in
15 violation of the Whistleblower Protection Act, California Labor Code § 1102.5.

16 4. Plaintiff MICHAEL MOLIERI reported his reasonable belief in detail regarding the
17 potential illegal activity and believed that in doing so he would be protected as a whistleblower under the
18 various statutes and ordinances. Plaintiff MICHAEL MOLIERI has continued in accordance with the
19 Whistleblower Protection Act. Plaintiff MICHAEL MOLIERI engaged in protected activity when he
20 reported his reasonable belief that legal violations were occurring.

21 5. Plaintiff MICHAEL MOLIERI reported the illegal conduct of Defendants SEQUOIA
22 UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and
23 DOES 1-100 inclusive, and each of them, and that the conduct was in violation of the Family Educational
24 Rights and Privacy Act (“FERPA”) as well as the Individuals with Disabilities Education Act (“IDEA”),
25 and other applicable laws.

26 6. Plaintiff MICHAEL MOLIERI was directed to participate in the ongoing violations and
27 other illegal activity occurring in the SEQUOIA UNION HIGH SCHOOL DISTRICT and refused to do
28 so.

7. As a result of the actions or inactions of Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and DOES 1-100 inclusive, and each of them, Plaintiff MICHAEL MOLIERI suffered economic and non-economic damages in an amount to be proven at trial.

8. The entirety of this Complaint is pled upon information and belief. Each allegation is likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

PARTIES AND VENUE

9. Plaintiff MICHAEL MOLIERI is and was at the time of the events giving rise to this Complaint, a resident of the County of Solano, California. Plaintiff MICHAEL MOLIERI is 59 years old, Hispanic and his national origin is Nicaraguan. He is a permanent, tenured employee of the SEQUOIA UNION HIGH SCHOOL DISTRICT. Molieri is also the Menlo Atherton High School's paid head basketball coach.

10. Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT (“Defendant SUHSD”) at all times relevant to this Complaint, is a public school district organized and operating under the laws of the State of California. SUHSD purposefully conducts substantial educational business activities in California, operating and controlling Menlo Atherton High School. The acts and omissions of Defendants SUHSD; CRYSTAL LEACH; TODD BEAL, BONNIE HANSEN, and DOES 1-100, and each of them, were the proximate cause of the injuries and losses suffered by Plaintiff.

11. Defendant CRYSTAL LEACH is an individual who, upon information and belief, is and was a resident of the state of California at all times relevant to this Complaint. Defendant CRYSTAL LEACH is the Superintendent at SUHSD and served in this capacity during the time of the incidents giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that Defendant CRYSTAL LEACH is, and at all times relevant to this action has been an employee of SUHSD.

12. Defendant TODD BEAL is an individual who, upon information and belief, is and was a resident of the state of California at all times relevant to this Complaint. Defendant TODD BEAL was the Assistant Superintendent at SUHSD and served in this capacity during the time of the incidents giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that Defendant TODD BEAL is, and at all times relevant to this action has been an employee of SUHSD.

13. Defendant BONNIE HANSEN is an individual who, upon information and belief, is and was a resident of the state of California at all times relevant to this Complaint. Defendant BONNIE HANSEN is now the Assistant Superintendent at SUHSD and served in this capacity during the time of the incidents giving rise to the instant action. Plaintiff is informed and believes, and thereon alleges, that Defendant BONNIE HANSEN is, and at all times relevant to this action has been an employee of SUHSD.

14. This Complaint encompasses a series of events wherein Defendants SUHSD; CRYSTAL LEACH; TODD BEAL, BONNIE HANSEN, and DOES 1-100, and each of them, acted or failed to act, in a retaliatory and discriminatory manner towards Plaintiff MICHAEL MOLIERI causing injuries and losses suffered by Plaintiff.

15. The true names and capacities, whether individual, corporate, partnership, joint venture, franchisee or otherwise of Defendants DOES 1-100, inclusive, are unknown to Plaintiff who sues these Defendants by fictitious names.

16. Each of the Defendants named in this Complaint as a DOE is legally responsible in some manner for the events and happenings alleged in this Complaint, and legally caused injury and damage to Plaintiff as alleged in this Complaint.

17. At all times mentioned in this Complaint, Defendants, and each of them, were the agents and employees of the remaining Defendants and were at all times acting within the course and scope of that agency and employment.

18. Plaintiff is informed, believes and therefore alleges that at all times mentioned herein, certain of the Defendant DOES are the successors in interest to each of the remaining Defendants and on that basis, are liable for any act or omission of Defendants alleged in this Complaint.

19. Venue is proper in this County because the incident giving rise to this Complaint occurred in this County.

EVENTS GIVING RISE TO THIS COMPLAINT

20. Defendant SUHSD has unlawfully discriminated and retaliated against Plaintiff MICHAEL MOLIERI's, an employee of Defendant SUHSD, protected conduct by unreasonably and excessively prolonging his placement on paid administrative leave pending the investigation of vague, purported

1 allegations of misconduct, in violation of the Educational Employment Relations Act, Government Code
2 section 3540 et seq., ("the Act") and as evidenced by, but not limited to, the foregoing.

3 21. On or about July of 2022, Plaintiff MICHAEL MOLIERI's Assistant Coach Jhavante Hill
4 (an African American man) was falsely accused by a student's parent of verbally abusing his son. Assistant
5 Principal Emmi requested that Plaintiff MICHAEL MOLIERI provide a statement regarding this issue.

6 22. Soon thereafter, on or about August of 2022, Assistant Superintendent, Defendant TODD
7 BEAL requested to meet with Plaintiff MICHAEL MOLIERI. Plaintiff MICHAEL MOLIERI
8 understandably requested information as to the purpose of the meeting. Defendant TODD BEAL
9 improperly refused to provide the information and instead stopped all communication with Plaintiff
10 MICHAEL MOLIERI and hired an outside investigator.

11 23. Defendant SUHSD turned the investigation over to Clair Cunningham and Plaintiff
12 MICHAEL MOLIERI requested the written complaint again and was advised that no such document
13 exists.

14 24. In late 2022, Plaintiff MICHAEL MOLIERI was interviewed regarding the complaint and
15 it was discovered that Clair Cunningham refused to interview any parents of the African American
16 community who had relevant information to the complaint. It was finally determined that a letter
17 complaint did exist despite numerous assertions that it did not and it was never turned over to Plaintiff
18 MICHAEL MOLIERI.

19 25. In April of 2023, a video surfaced of a student, who was in the STAR/Special Education
20 Program and worked with Plaintiff MICHAEL MOLIERI, involving an incident with the Atherton Police
21 Department. A manifestation meeting was conducted regarding the aforementioned student which was
22 attended by Defendant SUHSD personnel and representatives. Plaintiff MICHAEL MOLIERI was not in
23 attendance. The case manager for the student was Scott Kirk and Plaintiff MICHAEL MOLIERI had no
24 involvement in that incident other than the mere fact that he was a teacher of the student.

25 26. On or about May 4, 2023, an email was sent to Principal Karl Losekoot that summarized
26 Plaintiff MICHAEL MOLIERI's concerns about the student, the confidentiality of the matter under
27 applicable laws related to student records, and his advocacy for socially and economically disadvantaged
28 students of color. Concerns were also noted due to the appearance that Plaintiff MICHAEL MOLIERI

1 was being further targeted because of his relationship with brother, Dan Molieri (an investigator for a
2 different law firm that was pursuing claims related to the incident involving that student). Plaintiff
3 MICHAEL MOLIERI was reporting that the conduct of Defendant SUHSD and its personnel was
4 prohibited by the Family Educational Rights and Privacy Act (“FERPA”) and Individuals with Disabilities
5 Education Act (“IDEA”).

6 27. In mid-May of 2023, another Independent Education Program meeting was held by
7 administration where Plaintiff MICHAEL MOLIERI did attend and again, brought his concerns to
8 Defendant SUHSD including the fact that confidential information being was released which was
9 prohibited by FERPA and IDEA.

10 28. In June of 2023, an email was sent to Defendant CRYSTAL LEACH summarizing Plaintiff
11 MICHAEL MOLIERI’s concerns about being targeted and retaliated against for reporting concerns with
12 Defendant SHUSD’s unlawful disclosure of confidential student education records. It was indicated that
13 Plaintiff MICHAEL MOLIERI intended to file an administrative Uniform Complaint regarding the issue.
14 Plaintiff MICHAEL MOLIERI further highlighted his concerns about Defendant SUHSD’s improper
15 disclosure of information that was violative of the rules of confidentiality as it relates to the Independent
16 Education Program.

17 29. On or about November 2023, Defendant SUHSD’s representative, Kimberly Zilles, sent
18 Plaintiff MICHAEL MOLIERI emails demanding that he participate in an active lawsuit regarding a
19 student.

20 30. In or about February 2024, Plaintiff MICHAEL MOLIERI sent Kimberly Zilles an email
21 indicating that he would not actively participate in litigation involving the student due to his concerns
22 surrounding the illegality of Defendant SUHSD’s conduct.

23 31. On or about February 2024, Defendant SUHSD’s lawyer, Eliza McArthur, threatened
24 Plaintiff MICHAEL MOLIERI and said that if he didn’t participate in the lawsuit, she would talk to
25 Defendant SUHSD’s superintendent, Defendant CRYSTAL LEACH. Additionally, Eliza McArthur,
26 falsely accused Plaintiff MICHAEL MOLIERI of not following IDEA when in fact it was the
27 administration that had not followed those laws.

28 32. On or about November 2023, Plaintiff MICHAEL MOLIERI filed a complaint of

1 harassment against Defendant SUHSD's lawyer, Eliza McArthur, with Defendant CRYSTAL LEACH.

2 33. On or about March 2024, Defendant SUHSD's representative informed Plaintiff
3 MICHAEL MOLIERI that Eliza McArthur was not an employee of Defendant SUHSD and would not
4 investigate the complaint made of harassment.

5 34. On or about April 23, 2024, Plaintiff MICHAEL MOLIERI met with Defendant
6 CRYSTAL LEACH and discussed the complaint made against Defendant SUHSD's lawyer, Eliza
7 McArthur. Defendant CRYSTAL LEACH informed Plaintiff MICHAEL MOLIERI she would
8 investigate the matter and take proper action, however, nothing was done by Defendant CRYSTAL
9 LEACH.

10 35. On or about, August 5, 2024, Plaintiff MICHAEL MOLIERI received a letter from
11 Defendant TODD BEAL, Assistant Superintendent for Defendant SUHSD, placing him on
12 administrative leave effective August 12, 2024. Plaintiff MICHAEL MOLIERI has remained on paid
13 administrative leave ever since. Defendant SUHSD's placement of Plaintiff MICHAEL MOLIERI on paid
14 administrative leave is an adverse action under the Act.

15 36. After placing him on administrative leave, Defendant SUHSD explained it had done so as
16 part of an investigation into unspecified misconduct allegations against Plaintiff MICHAEL MOLIERI.
17 Defendant SUHSD also informed Plaintiff MICHAEL MOLIERI that it intended to interrogate him as
18 part of its investigation.

19 37. On or about August 2024, Plaintiff MICHAEL MOLIERI filed an administrative
20 complaint of retaliation and harassment against Defendant SUHSD's Vice-Principal Amy Hanson,
21 Principal Karl Losekoot, Assistant Superintendent Defendant TODD BEAL, and Superintendent
22 Defendant CRYSTAL LEACH.

23 38. In or about August and September 2024, Plaintiff MICHAEL MOLIERI, through his
24 outside counsel and union, requested Defendant SUHSD provide him with sufficient information
25 regarding the allegations against him to permit him to meaningfully participate, and his union to
26 meaningfully represent him, in Defendant SUHSD's investigation, including the intended interrogation.
27 Plaintiff MICHAEL MOLIERI's requests are protected activity under the Act.

28 39. Defendant SUHSD refused to provide Plaintiff MICHAEL MOLIERI, his outside

1 counsel, or union with the requested information. In or about September 2024, Plaintiff MICHAEL
2 MOLIERI's union was compelled to file an unfair practice charge challenging Defendant SUHSD's
3 misconduct. The filing of that charge is protected activity on the part of Plaintiff MICHAEL MOLIERI
4 under the Act.

5 40. On or about October 2024, Defendant SUHSD informed Plaintiff MICHAEL MOLIERI
6 that they would investigate the claims made by Plaintiff MICHAEL MOLIERI, but has done nothing to
7 indicate that an investigation is actually taking place and Plaintiff MICHAEL MOLIERI is continually
8 being retaliated against. The administrative investigation and interview of Plaintiff MICHAEL MOLIERI
9 has yet to take place and he remains off work, on administrative leave.

10 41. Repeatedly during the period September 2024 through March 2025, Plaintiff MICHAEL
11 MOLIERI objected to Defendant SUHSD as to the slow pace of the investigation, and requested
12 Defendant SUHSD schedule his interrogation, which had not yet occurred. Plaintiff MICHAEL
13 MOLIERI 's repeated objections to the slow pace of the investigation, and his requests that Defendant
14 SUHSD interrogate him as part of that investigation, are protected activity under the Act.

15 42. In or about early April 2025, after more than eight months' delay, Defendant SUHSD's
16 investigator finally contacted Plaintiff MICHAEL MOLIERI to schedule an interrogation. An
17 interrogation was scheduled for April 23, 2025. Two days before that date, the investigator canceled the
18 interrogation. This was necessary, the investigator explained, because, according to Defendant SUHSD,
19 Plaintiff MICHAEL MOLIERI had requested additional time to prepare for the interrogation. This was
20 false. Plaintiff MICHAEL MOLIERI had not requested additional time to prepare for the investigation.
21 On the contrary, for many months, Plaintiff MICHAEL MOLIERI had urgently requested Defendant
22 SUHSD complete its investigation quickly, including by interrogating him. Defendant SUHSD's
23 investigator subsequently informed Plaintiff MICHAEL MOLIERI that Defendant SUHSD now stated
24 that *it* — Defendant SUHSD — wished to delay the scheduled interrogation.

25 43. Defendant SUHSD finally interrogated Plaintiff MICHAEL MOLIERI on June 4, 2025,
26 and again on June 24, 2025.

27 44. On or about August 25, 2025, Plaintiff MICHAEL MOLIERI's Union filed a PERB action
28 specifically addressing Defendants' ongoing discriminatory and retaliatory conduct.

1 45. On or about October 7, 2025, Plaintiff MICHAEL MOLIERI's Union filed a second
2 PERB action specifically addressing Defendants' ongoing discriminatory and retaliatory conduct.

3 46. Though it has now spent more than a year investigating the allegations against him,
4 including multiple interrogations, Defendant SUHSD has kept Plaintiff MICHAEL MOLIERI on paid
5 administrative leave. Defendant SUHSD has failed to adequately and timely investigate this matter. As a
6 result of Defendant SUHSD's conduct, Plaintiff MICHAEL MOLIERI missed the entire 2024-25
7 academic year, and now the start of the following 2025-26 year as well. Defendant SUHSD's continued
8 placement of Plaintiff MICHAEL MOLIERI on administrative leave is an adverse action within the
9 meaning of the Act.

10 47. Defendant SUHSD's adverse action was unlawfully motivated as demonstrated by, but not
11 limited to, the following:

- 12 • The close temporal proximity between Plaintiff MICHAEL MOLIERI's protected activity,
13 occurring during the period August 2024 through at least March 2025, and Defendant
14 SUHSD's adverse action, occurring during this same time period and continuing to date;
- 15 • The administrative leave has been extraordinarily lengthy, far in excess of any reasonable
16 investigation;
- 17 • Defendant SUHSD has never offered any explanation for the duration of the
18 administrative leave;
- 19 • Defendant SUHSD unreasonably extended the administrative leave by delaying the
20 scheduling of its interrogation of Plaintiff MICHAEL MOLIERI;
- 21 • Defendant SUHSD further extended the administrative leave by cancelling the scheduled
22 April 2025 interrogation of Plaintiff MICHAEL MOLIERI;
- 23 • Defendant SUHSD offered shifting explanations for canceling the scheduled April 2025
24 interrogation, first blaming Plaintiff MICHAEL MOLIERI before then admitting that
25 Defendant SUHSD itself had demanded the interrogation be canceled.

26 48. It is clear that the allegations relied upon by Defendant SUHSD in placing Plaintiff
27 MICHAEL MOLIERI on administrative leave have been done in retaliation for Plaintiff MICHAEL
28 MOLIERI engaging in actions protected by the Whistleblower Protection Act, California Labor Code §
1102.5 and are discriminatory based on the differential treatment of other employees of Defendant
SUHSD that are not of the same ethnic descent. Those allegations include, but are not limited to:

- 29 • Plaintiff MICHAEL MOLIERI allowing students to be in his classroom instead of their
30 assigned classes;

- 1 • Plaintiff MICHAEL MOLIERI failing to notify Defendant SUHSD of students he
2 believed needed a change to their Individualized Education Programs or referrals to special
education;
- 3 • Plaintiff MICHAEL MOLIERI allegedly disclosing confidential student information to
4 non-district employees which is prohibited by FERPA and IDEA;
- 5 • Plaintiff MICHAEL MOLIERI making false statements about students to school site and
district Special Education staff and administrators;
- 6 • Plaintiff MICHAEL MOLIERI allegedly soliciting parents, students, and/or staff to
7 engage the professional services of his non-employee brother, D. Molieri, or otherwise use
his position as a District employee to assist in D. Molieri's representation or work on
behalf of parents, students and/or staff.

9 49. Plaintiff MICHAEL MOLIERI has denied all of these allegations and/or has denied that
10 any such actions violate any applicable administrative policies or procedures. It is the school district's
11 obligation to identify students with disabilities and provide the student with the appropriate services in
12 order for them to access their education even if parents do not ask for it. Plaintiff MICHAEL MOLIERI
13 is informed and believes that other Defendant SUHSD employees who are not of the same ethnic descent,
14 engage in the same or similar activities and have not been investigated and/or placed on administrative
15 leave for their actions. Furthermore, the allegations of misconduct only arose after Plaintiff MICHAEL
16 MOLIERI reported his reasonable belief that legal violations in SUHSD were occurring, and clearly in
17 retaliation for doing so. Specifically, as to the allegations related to Plaintiff MICHAEL MOLIERI's
18 brother, the actions he was engaged in related to exposing SUHSD's unlawful acts that that his brother D.
19 Molieri was assisting with investigating.

20 50. The discriminatory and retaliatory conduct by Defendants SUHSD; CRYSTAL LEACH;
21 TODD BEAL, BONNIE HANSEN, and DOES 1-100 toward Plaintiff MICHAEL MOLIERI is
22 ongoing and continues as of the date of this filing. The conduct of Defendants has caused significant
23 damage to Plaintiff MICHAEL MOLIERI's reputation and has destroyed his decades long career of
24 teaching and coaching.

25 51. Defendants' acts and omissions alleged above constitute unlawful discrimination and
26 retaliation in violation of Government Code section 3543.5, subdivision (a).

27 52. As a result of the discriminatory and retaliatory actions of Defendants SUHSD; CRYSTAL
28 LEACH; TODD BEAL, BONNIE HANSEN, and DOES 1-100, and each of them, Plaintiff MICHAEL

1 MOLIERI suffered economic and non-economic damages in an amount to be proven at trial.

2 **COMPLIANCE WITH CLAIMS PRESENTATION REQUIREMENTS**

3 53. Plaintiff MICHAEL MOLIERI filed a Charge of Discrimination with the U.S. Equal
4 Employment Opportunity Commission (“EEOC”) prior to filing this complaint. Plaintiff presented his
5 Charge of Discrimination to EEOC on October 29, 2024. Thereafter, the EEOC issued Plaintiff
6 MICHAEL MOLIERI a Right to Sue letter. Plaintiff has filed this complaint within less than one year
7 since the date of the Right to Sue letter.

8 54. Plaintiff MICHAEL MOLIERI has satisfied all claims presentation requirements of the
9 Government Claims Act prior to filing this complaint. Plaintiff presented his claims to the government
10 entity named in this complaint on April 30, 2025. Plaintiff's claims were rejected on August 22, 2025 by
11 the government entity named herein by operation of law and were not rejected on the grounds that the
12 claims were untimely. Plaintiff has filed this complaint within less than six months since the date of
13 rejection.

14 **FIRST CAUSE OF ACTION – RACE DISCRIMINATION**

15 **(Violation of FEHA, Gov. Code §12940(a))**

16 **(Against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
TODD BEAL; BONNIE HANSEN; and DOES 1-100)**

17 55. Plaintiff MICHAEL MOLIERI incorporates by reference paragraphs 1-54 above as
18 though fully set forth herein.

19 56. Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT is an employer subject to
20 suit under the FEHA which provides, in pertinent part, that it is unlawful for “an employer, because of
21 the... race... of any person, to... discriminate against the person... in terms, conditions, or privileges of
22 employment.” (Gov. Code §12940(a))

23 57. Plaintiff MICHAEL MOLIERI, who is Hispanic and his national origin is Nicaraguan, is
24 an employee of Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT as a Case Manager and is
25 a permanent, tenured employee.

26 58. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
27 TODD BEAL; BONNIE HANSEN; and DOES 1-100 and each of them, made numerous decisions
28 referenced herein which subjected Plaintiff MICHAEL MOLIERI to adverse employment actions and

1 altered his terms and conditions of employment, including being placed on administrative leave. Plaintiff
2 MICHAEL MOLIERI's race was a substantial motivating reason for these decisions.

3 59. As a direct and legal result of Defendants' actions as aforesaid, Plaintiff MICHAEL
4 MOLIERI has suffered and will suffer economic and non-economic damages in an unascertained
5 amount that exceed the minimum jurisdiction of this Court.

6 60. As a further direct and legal result of Defendants' actions as aforesaid, Plaintiff
7 MICHAEL MOLIERI has been, and may continue to be, unable to work due to the events described in
8 this Complaint and, accordingly, has suffered lost wages and will continue to suffer loss of earnings in an
9 amount presently unknown, but with special damages exceeding the minimum jurisdiction of this Court.

10 Wherefore, Plaintiff MICHAEL MOLIERI prays for judgment against Defendants SEQUOIA
11 UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and
12 DOES 1-100, as set forth below.

13 **SECOND CAUSE OF ACTION – AGE DISCRIMINATION**
14 **(Violation of FEHA, Gov. Code §12940(a))**
15 **(Against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;**
16 **TODD BEAL; BONNIE HANSEN; and DOES 1-100)**

17 61. Plaintiff MICHAEL MOLIERI incorporates by reference paragraphs 1-60 above as
though fully set forth herein.

18 62. Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT is an employer subject to
19 suit under the FEHA which provides, in pertinent part, that it is unlawful for "an employer, because of
20 the... age... of any person, to... discriminate against the person... in terms, conditions, or privileges of
21 employment." (Gov. Code §12940(a))

22 63. Plaintiff MICHAEL MOLIERI, who is 59 years old, is an employee of Defendant
23 SEQUOIA UNION HIGH SCHOOL DISTRICT as a Case Manager and is a permanent, tenured
24 employee.

25 64. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
26 TODD BEAL; BONNIE HANSEN; and DOES 1-100 and each of them, made numerous decisions
27 referenced herein which subjected Plaintiff MICHAEL MOLIERI to adverse employment actions and
28 altered his terms and conditions of employment, including being placed on administrative leave. Plaintiff

1 MICHAEL MOLIERI's age was a substantial motivating reason for these decisions.

2 65. As a direct and legal result of Defendants' actions as aforesaid, Plaintiff MICHAEL
3 MOLIERI has suffered and will suffer economic and non-economic damages in an unascertained
4 amount that exceed the minimum jurisdiction of this Court.

5 66. As a further direct and legal result of Defendants' actions as aforesaid, Plaintiff
6 MICHAEL MOLIERI has been, and may continue to be, unable to work due to the events described in
7 this Complaint and, accordingly, has suffered lost wages and will continue to suffer loss of earnings in an
8 amount presently unknown, but with special damages exceeding the minimum jurisdiction of this Court.

9 Wherefore, Plaintiff MICHAEL MOLIERI prays for judgment against Defendants SEQUOIA
10 UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and
11 DOES 1-100, as set forth below.

12 **THIRD CAUSE OF ACTION – RETALIATION**
13 **(Violation of FEHA, Gov. Code §12940(h))**

14 **(Against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
TODD BEAL; BONNIE HANSEN; and DOES 1-100)**

15 67. Plaintiff MICHAEL MOLIERI incorporates by reference paragraphs 1-66 above as
16 though fully set forth herein.

17 68. Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT is an employer subject to
18 suit under the FEHA which provides, in pertinent part, that it is unlawful for an employer to retaliate
19 against its employees for engaging in protected conduct. (Gov. Code §12940(h))

20 69. Plaintiff MICHAEL MOLIERI is an employee of Defendant SEQUOIA UNION HIGH
21 SCHOOL DISTRICT as a Case Manager who engaged in protected activities which include, but are not
22 limited to, reporting illegal conduct that was occurring due to the actions of Defendant SEQUOIA
23 UNION HIGH SCHOOL DISTRICT employees which violated FERPA and IDEA, and refusing to
24 participate in those illegal activities.

25 70. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
26 TODD BEAL; BONNIE HANSEN; and DOES 1-100 and each of them, made numerous decisions
27 referenced herein which subjected Plaintiff MICHAEL MOLIERI to adverse employment actions and
28 altered his terms and conditions of employment, including being placed on administrative leave. Plaintiff

1 MICHAEL MOLIERI's engagement in protected conduct and refusal to participate in the illegal
2 conduct, was a substantial motivating reason for these decisions.

3 71. As a direct and legal result of Defendants' actions as aforesaid, Plaintiff MICHAEL
4 MOLIERI has suffered and will suffer economic and non-economic damages in an unascertained
5 amount that exceed the minimum jurisdiction of this Court.

6 72. As a further direct and legal result of Defendants' actions as aforesaid, Plaintiff
7 MICHAEL MOLIERI has been, and may continue to be, unable to work due to the events described in
8 this Complaint and, accordingly, has suffered lost wages and will continue to suffer loss of earnings in an
9 amount presently unknown, but with special damages exceeding the minimum jurisdiction of this Court.

10 Wherefore, Plaintiff MICHAEL MOLIERI prays for judgment against Defendants SEQUOIA
11 UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and
12 DOES 1-100, as set forth below.

13 **FOURTH CAUSE OF ACTION – RETALIATION**
14 **(Violation of Lab. Code §1102.5)**
15 **(Against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;**
16 **TODD BEAL; BONNIE HANSEN; and DOES 1-100)**

17 73. Plaintiff MICHAEL MOLIERI incorporates by reference paragraphs 1-72 above as
though fully set forth herein.

18 74. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
19 TODD BEAL; BONNIE HANSEN; and DOES 1-100's actions, as described above, violated California
20 Labor Code section 1102.5(b), which prohibits an employer, or any person acting on behalf of an
21 employer, from retaliating against an employee for disclosing information to a government agency or
22 threatening to disclose to a government agency, to a person with authority over the employee or another
23 employee who has the authority to investigate, discover, or correct the violation or noncompliance, where
24 the employee has reasonable cause to believe that the information discloses a violation of law or
25 noncompliance with a local, state, or federal rule or regulation.

26 75. Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH;
27 TODD BEAL; BONNIE HANSEN; and DOES 1-100's actions, as described above, violate California
28 Labor Code section 1102.5(c) which prohibits an employer, or any person acting on behalf of an employer,

1 from retaliating against an employee for refusing to participate in an activity that would result in a violation
2 of law or noncompliance with a local, state, or federal rule or regulation.

3 76. Plaintiff MICHAEL MOLIERI reported his reasonable belief in detail regarding the
4 potential illegal activity and believed that in doing so he would be protected as a whistleblower under the
5 various statutes and ordinances. Plaintiff MICHAEL MOLIERI has continued in accordance with the
6 Whistleblower Protection Act. Plaintiff MICHAEL MOLIERI engaged in protected activity when he
7 reported his reasonable belief that legal violations in the District were occurring.

8 77. Plaintiff MICHAEL MOLIERI is an employee of Defendant SEQUOIA UNION
9 HIGH SCHOOL DISTRICT as a Case Manager who engaged in protected activities which include, but
10 are not limited to, reporting illegal conduct that was occurring due to the actions of Defendant
11 SEQUOIA UNION HIGH SCHOOL DISTRICT employees which violated FERPA and IDEA, and
12 refusing to participate in those illegal activities.

13 78. Plaintiff MICHAEL MOLIERI reasonably believed that Defendants would abide by its
14 own internal handbooks, procedures, written agreements, rules and regulations, amendments and
15 modifications to agreements in selecting employees for termination.

16 79. Plaintiff MICHAEL MOLIERI's employment was governed by written policies and
17 procedures which set forth the terms of the employment relationship. Under these written terms,
18 Plaintiff is not an "at will" employee and could only be terminated for good cause and with due process.

19 80. Plaintiff performed all the conditions of his employment agreement that was required of
20 him.

21 81. Defendants failed to carry out its responsibilities under the terms of the employment
22 agreement by wrongfully and without cause placing Plaintiff MICHAEL MOLIERI on administrative
23 leave. Defendants further breached its employment agreement with Plaintiff by unlawfully retaliating
24 against him.

25 82. Plaintiff MICHAEL MOLIERI's placement on administrative leave from his
26 employment was not for good cause and violated the due process provisions of the written and implied
27 policies and procedures which governed the employee-employer relationship between Plaintiff and
28 Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT.

83. As a direct, legal and proximate cause of Defendants' breach of employment agreement, Plaintiff suffered and continues to suffer, substantial losses in earnings and benefits, which he would have received had Defendants not breached the employment agreements with Plaintiff.

Wherefore, Plaintiff MICHAEL MOLIERI prays for judgment against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and DOES 1-100, as set forth below.

PRAYER

WHEREFORE, with respect to each cause of action listed above, Plaintiff MICHAEL MOLIERI prays for damages against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and DOES 1-100, and each of them as follows:

1. General Damages in an amount to be determined by proof at trial;
2. Special damages in an amount to be determined by proof at trial;
3. Reasonable attorneys' fees and costs as permitted by law;
4. Interest as permitted by law;
5. Any other and further relief that the court considers proper.

DEMAND FOR JURY TRIAL

As to the matters complained of herein against Defendants SEQUOIA UNION HIGH SCHOOL DISTRICT; CRYSTAL LEACH; TODD BEAL; BONNIE HANSEN; and DOES 1-100, and each of them, Plaintiff MICHAEL MOLIERI demands a trial by jury.

Dated: October 27, 2025

Respectfully submitted,

**RAINS LUCIA STERN
ST. PHALLE & SILVER, PC**

By: Harry S. Stern
Attorneys for Plaintiff MICHAEL MOLIERI