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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
(Central – Hall of Justice)

MORGAN DONNELLY; TRISTAN
HARDIN; ISABELLA MASON; ALEX
ROEHR; AND CLAIRE
WARRENFELT,

Plaintiffs,

vs.

CITY OF EL CAJON; HEARTLAND
FIRE & RESCUE JPA; AMERICAN
MEDICAL RESPONSE, INC.;
AMERICAN MEDICAL RESPONSE
OF SAN DIEGO, INC.; and DOES 1 to
20,

Defendants.

CASE NO.: 25CU049465C

COMPLAINT FOR:

**1. Hostile Work Environment Sexual
Harassment [Gov. Code § 12940(j)]; and
2. Failure to Prevent Harassment and
Discrimination [Gov. Code § 12940(k)].**

Plaintiffs Morgan Donnelly, Tristan Hardin, Isabella Mason, Alex Roehr, and Claire
Warrenfelt allege:

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1 **GENERAL ALLEGATIONS**

2 1. Plaintiff, Morgan Donnelly (“Donnelly”), is an adult female residing in San Diego
3 County, California. At all relevant times, Donnelly was an employed as a paramedic stationed at El
4 Cajon Fire/Heartland Fire & Rescue Station 8.

5 2. Plaintiff, Tristan Hardin (“Hardin”), is an adult female residing in San Diego County,
6 California. At all relevant times, Hardin was an employed as a paramedic stationed at El Cajon
7 Fire/Heartland Fire & Rescue Station 8.

8 3. Plaintiff, Isabella Mason (“Mason”), is an adult female residing in San Diego County,
9 California. At all relevant times, Mason was an employed as an EMT stationed at El Cajon
10 Fire/Heartland Fire & Rescue Station 8.

11 4. Plaintiff, Alex Roehr (“Roehr”), is an adult male residing in San Diego County,
12 California. At all relevant times, Roehr was an employed as an EMT stationed at El Cajon
13 Fire/Heartland Fire & Rescue Station 8.

14 5. Plaintiff, Claire Warrenfelt (“Warrenfelt”), is an adult female residing in San Diego
15 County, California. At all relevant times, Warrenfelt was an employed as an EMT stationed at El
16 Cajon Fire/Heartland Fire & Rescue Station 8.

17 6. Plaintiffs Morgan Donnelly, Tristan Hardin, Isabella Mason, Alex Roehr, and Claire
18 Warrenfelt are collectively referred to as “Plaintiffs.”

19 7. Defendant, City of El Cajon (“the City”), is a local governmental entity. At all
20 relevant times, the City was an employer subject to the Fair Employment and Housing Act
21 (“FEHA”).

22 8. Defendant, Heartland Fire & Rescue JPA (“Heartland”), is a local governmental
23 entity. At all relevant times, Heartland was an employer subject to the Fair Employment and
24 Housing Act (“FEHA”).

25 9. Defendant, American Medical Response, Inc. (“AMR”), is a corporation organized
26 and existing in the State of Delaware. At all relevant times, AMR was an employer subject to the
27 Fair Employment and Housing Act (“FEHA”).

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1 10. Defendant, American Medical Response of San Diego, Inc. (“AMR”), is a corporation
2 organized and existing in the State of California with its principal place of business in San Diego
3 County. At all relevant times, AMRSD was an employer subject to the Fair Employment and
4 Housing Act (“FEHA”).

5 11. Plaintiffs do not know the names of Defendants Does 1 through 20. The true names
6 and capacities, whether individual or otherwise, of defendants Does 1 through 20 are unknown to
7 Plaintiffs who, therefore, sue them by such fictitious names under CCP § 474. Plaintiffs are
8 informed and believe that each of the defendants is responsible in some manner for the acts of
9 omissions alleged in this complaint or caused their damages. Collectively, The City, Heartland,
10 AMR, AMRSD and Does 1 through 20 may be jointly referred to as “Defendants.”

11 12. At all relevant times, Defendants employed Plaintiffs. In the alternative, at all relevant
12 times, Defendants were engaged with Plaintiffs as agents, contractors, volunteers, or joint employers.

13 13. At all relevant times, all of the Defendants conspired with, aided, incited, abetted,
14 authorized, and ratified all of the actions of all of the other Defendants. Plaintiffs are informed and
15 believe, and based thereupon alleges, that at all material times, Defendants, and each of them, were
16 the agents, employees, managing agents, supervisors, coconspirators, parent corporation, joint
17 employers, alter ego, and/or joint ventures of the other Defendants, and each of them, and in doing
18 the things alleged herein, were acting within the course and scope of said agency, employment,
19 conspiracy, joint employer, alter ego status, and/or joint venture and with the permission and consent
20 of each of the other Defendants. Whenever and wherever reference is made in this Complaint to any
21 act or failure to act by a Defendant or co-Defendant, such allegations and references shall also be
22 deemed to mean the acts and/or failures to act by each Defendant acting individually, jointly and
23 severally.

24 14. At all relevant times, Defendants failed to comply with the Fair Employment and
25 Housing Act (“FEHA”), which was enacted to ensure workplaces free from harassment. California
26 requires employers to take active measures to prevent sexual violence and harassment in the
27 workplace. For example, at Gov. Code 12940(j)(1), FEHA states, “*An entity shall take all*
28 *reasonable steps to prevent harassment from occurring.*” Subsection (k) states, “*It is an unlawful*

1 *business practice . . . [f]or an employer . . . to fail to take all reasonable steps necessary to prevent*
2 *discrimination and harassment from occurring.”* One mandatory step for an employer, as stated in
3 2 CCR 11023(b)(7), is “*to conduct a fair, timely, and thorough investigation*” of any suspected
4 violation. Another step is to take corrective, but subsection (b)(9) states that “*appropriate*” remedial
5 action can occur only after the *bona fide* investigation: “*if at the end of the investigation misconduct*
6 *is found, appropriate remedial measures shall be taken.*” In 2017, California’s Civil Rights
7 Department (“CCRD”) issued a 16-page “*Harassment Prevention Guide For California Employers*”
8 (“the Guide”), providing a detailed explanation of FEHA and the affirmative duties of California
9 employers. For example, the CCRD tells employers that “*An Effective Anti-Harassment Program*
10 *Include[s] . . . Prompt, thorough and fair investigations of complaints [and] Prompt and fair*
11 *remedial action.*” FEHA’s mandate for employers to conduct *bona fide* investigations, followed by
12 legitimate corrective action, is enforced by creating strict liability for employers who fail. For
13 example, Gov. Code 12940(j)(1) and 2 CCR 11304(f)(2)(C)1, 2 state that employers are not only
14 “*strictly liable for the harassing conduct of its agents or supervisors, regardless of whether the*
15 *employer or other covered entity knew or should have known of the harassment,*” but an employer
16 is also strictly liable “*for harassment of an employee . . . if the entity or its agents or supervisors*
17 *knows or should have known of the harassment and fails to take immediate and appropriate*
18 *corrective action.*”

19 15. On or about February 2, 2025, Defendants learned that one or more of its employees
20 or agents had used concealed cameras to secretly videotape, film, photograph, and record by
21 electronic means the Plaintiffs and other victims, in states of full and partial undress, while inside
22 their bunk rooms (which constituted their bedrooms, bathrooms, changing rooms, fitting rooms,
23 dressing rooms, and areas in which the victims had reasonable expectations of privacy) at El Cajon
24 Fire/Heartland Fire & Rescue Station 8, for the purpose of viewing their bodies and undergarments.

25 16. To date, Defendants have failed and refused to comply with their legally mandated
26 duty to conduct an investigation and instead have attempted to delegate that duty to law enforcement.
27 By refusing to investigate, Defendants are violating Plaintiffs’ civil rights and rights as employees
28 in the State of California. While the purpose of the law enforcement investigation is to punish, the

1 purpose of a FEHA investigation is remedial. A FEHA investigation allows the employer (i.e.
2 Defendants) to take corrective action to ensure that its employees (i.e. Plaintiffs) are protected from
3 further harm and potential future harassment. Defendants cannot complete these legally mandated
4 duties without the requisite investigation, which they refuse to do.

5 17. On March 28, 2025, Morgan Donnelly, Tristan Hardin, Isabella Mason and Claire
6 Warrenfelt filed a complaint with the Civil Rights Department (“CRD”) and received a right-to-sue
7 letter on the same date. On May 8, 2025, Roehr filed a complaint with the CRD received a right-to-
8 sue letter on the same date. On September 3, 2025, all Plaintiffs amended their complaints with the
9 CRD to add additional respondents, including all Defendants herein. Plaintiffs have exhausted their
10 administrative remedies.

11 **FIRST CAUSE OF ACTION**
12 **(Hostile Work Environment Sexual Harassment Against All Defendants)**

13 18. Plaintiffs re-allege paragraphs 1 through 17.

14 19. The clandestine videoing of staff members, including Plaintiffs, is a form of sexual
15 voyeurism that was sexually harassing. Those actions were and are unwelcome and invaded
16 Plaintiffs’ sexual privacy in their bunk areas where they would be undressed to various degrees and
17 engaged in acts of personal hygiene and other needs. Plaintiffs and others were targeted because of
18 their gender.

19 20. These unwelcome actions, and Defendants subsequent failure to take timely action
20 to correct and remedy the ongoing sex harassment as alleged in Paragraphs 15-16, *supra*, has the
21 effect of unreasonably interfering with Plaintiffs’ work environment. Plaintiffs fear that their images
22 may have been disseminated and their fears may never be alleviated as a result of the Defendants’
23 ongoing refusal to investigate. Plaintiffs’ workplace has therefore become so abusive and
24 objectively and subjectively offensive that a hostile work environment has been created.

25 21. Plaintiffs objectively and subjectively perceived the unwelcome conduct by
26 Defendants as hostile and abusive.

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1 22. Defendants knew or should have known about the unwelcome conduct (i.e. the
2 cameras) such that Defendants should have been able to take timely action both before and after
3 Defendants discovered the cameras to either prevent or mitigate the sexual harassment. Defendants
4 have failed and refused to take appropriate and timely action to correct the abusive behavior and
5 environment so as to prevent future harm or mitigate the ongoing harm to the Plaintiffs.

6 23. As a legal result of the sexual harassment, Plaintiffs have economic and non-
7 economic damages in an amount to be proven at trial, including, but not limited to, past and future
8 medical expenses, past and future lost wages and earning capacity, emotional distress,
9 embarrassment, humiliation, and mental anguish and suffering.

10 **SECOND CAUSE OF ACTION**
11 **(Failure to Prevent Harassment and Discrimination Against All Defendants)**

12 24. Plaintiffs re-allege paragraphs 1 through 23.

13 25. As alleged in Paragraphs 15-16 and 19-22, *supra*, Plaintiffs were subjected to sexual
14 harassment in the course of their employment with Defendants. As alleged in Paragraphs 15-16 and
15 19-22, *supra*, Defendants failed to take all reasonable steps to both prevent the sexual harassment
16 and take appropriate and timely action to correct the abusive behavior and environment so as to
17 prevent future harm or mitigate the ongoing harm to the Plaintiffs.

18 27. Defendants' failure to take steps to prevent the sexual harassment and to take
19 appropriate and timely action to correct the abusive behavior and environment so as to prevent future
20 harm or mitigate the ongoing harm to the Plaintiffs as alleged in Paragraphs 15-16 and 19-22, *supra*,
21 was a substantial factor in causing harm to Plaintiffs and has further aggravated and exacerbated
22 Plaintiffs' emotional harms resulting from the clandestine video.

23 28. As a legal result of the failure to prevent harassment and take timely and appropriate
24 corrective actions, including a impartial investigation, Plaintiffs have suffered economic and non-
25 economic damages in an amount to be proven at trial, including, but not limited to, past and future
26 medical expenses, past and future lost wages and earning capacity, emotional distress,
27 embarrassment, humiliation, and mental anguish and suffering.

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REQUEST FOR RELIEF

Therefore, Plaintiffs Morgan Donnelly, Tristan Hardin, Isabella Mason, Alex Roehr, and Claire Warrenfelt request judgment against Defendants City of El Cajon, Heartland Fire & Rescue JPA, American Medical Response, Inc., American Medical Response of San Diego, Inc. and Does 1 to 20 as follows:

- a. Special and general damages according to proof;
- b. Attorney's fees allowable by law;
- c. Costs of court; and
- d. Other further relief.

Date: September 17, 2025

Gilleon Law Firm, APC

Samuel A. Clemens

Daniel M. Gilleon, Samuel A. Clemens Attorneys for
Plaintiffs Morgan Donnelly, Tristan Hardin, Isabella
Mason, Alex Roehr, and Claire Warrenfelt