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County of Los Angeles  
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10 **SUPERIOR COURT IN THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES**

12 JENNY PARK,

13 Plaintiff,

14 vs.

15 CITY OF LOS ANGELES, a municipal  
16 corporation, and DOES 1 through 10,  
17 inclusive,

18 Defendants.

19 **CASE NO. 24STCV32929**

20 **COMPLAINT FOR**

- 21 **1. Whistleblower Retaliation (Cal. Labor Code § 1102.5)**
- 22 **2. Wrongful Termination in Violation of Public Policy**
- 23 **3. Retaliation in Violation of the Fair Employment and Housing Act**

24 **DEMAND FOR JURY TRIAL**

25 **Introduction**

26 Plaintiff, Jenny Park, brings this action against defendants The City of Los Angeles and  
27 DOES 1 through 10, inclusive, (collectively “Defendants”) and alleges as follows:

28 1. Fearful of being exposed, especially after being hailed as the first female to lead the  
LAFD, Fire Chief Kristin Crowley and her right-hand Chief Deputy Orin Saunders terminated Ms.  
Park, an exemplary employee with the LAFD and its highest-ranking Asian and female civilian,  
for speaking out against numerous violations. While the outside world saw curated and filtered

1 snippets, those on the inside were left to deal with Crowley’s and Saunders’ failures of leadership  
2 and had to endure silently or risk retaliation. Ms. Park chose to speak up and was terminated in  
3 retaliation for complaining and reporting improper acts by the newly appointed Fire Chief and her  
4 Chief Deputy of Administrative Operations. Furious that Ms. Park would not simply look away  
5 at repeated violations of City rules and regulations, and other possible violations of laws,  
6 Defendants waged a campaign of harassment, intimidation, subterfuge, and retaliation against Ms.  
7 Park, leading up to her notice of termination merely days before Christmas. Chief Crowley  
8 mistakenly believed her historic appointment gave her license to engage in unlawful retaliatory  
9 conduct against another woman. She was wrong.

10 **General Allegations**

11 2. This Court has proper jurisdiction of this action because the alleged wrongful  
12 conduct occurred at a place of employment situated in the City of Los Angeles, in the County of  
13 Los Angeles, State of California.

14 3. Plaintiff, Jenny Park (“Plaintiff” or “Ms. Park”), is an over 40-year-old Asian-  
15 American, heterosexual female who, at all times material to this complaint, was an employee of  
16 the City of Los Angeles and living in the County of Los Angeles in the State of California. At all  
17 material times alleged herein, Plaintiff was an employee within the meaning of California *Labor*  
18 *Code* § 1102.5(b), which expressly prohibits an employer, or any person acting on behalf of the  
19 employer, from taking retaliatory actions against an employee for disclosing information if the  
20 employee has reasonable cause to believe that the information discloses a violation of state or  
21 federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation,  
22 regardless of whether disclosing the information is part of the employee’s job duties.

23 4. Defendant, City of Los Angeles (“City”), was and is a governmental entity  
24 incorporated and licensed to do business in the State of California. Defendant City of Los Angeles  
25 was at all material times an employer within the meaning of California *Government Code* §§  
26 12926(d) and 12940(j)(4)(A) and, as such, is barred from discriminating or retaliating in  
27 employment or retaliating employees, as set forth in *Government Code* § 12940, et seq.  
28



1 Ms. Park filed charges with the California Civil Rights Department and received her right to sue  
2 letter on September 24, 2024. As such, Ms. Park has exhausted all her administrative remedies.

3 **Facts Common To All Causes Of Action**

4 9. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1  
5 through 8 as though fully set forth herein.

6 10. Ms. Jenny Park began her tenure with the City of Los Angeles as a Deputy City  
7 Attorney. In that position, she was primarily assigned to represent the Los Angeles Fire  
8 Department (“LAFD” or “Department”) for which she was recognized with a City Attorney  
9 Certification for Outstanding Service.

10 11. Based on her successful guidance and representation of the LAFD in complicated  
11 matters, LAFD executives were impressed by Ms. Park’s performance and tenacity. The Chief  
12 Deputy of Administrative Operations at the time recruited her to apply for the LAFD’s new Public  
13 Safety Risk Manager position. The position had been created to address systemic problems within  
14 the Department which had resulted in millions of dollars of judgments and payouts. The  
15 Department hired Ms. Park and she started her new position in March 2013.

16 12. The core function of the Public Safety Risk Manager was to provide subject matter  
17 expertise and oversight to ensure compliance with statutes, rules and regulations and to review and  
18 develop policies that would reduce exposure to liability. As such, it was necessary that Ms. Park  
19 advise the Fire Chief and Command Staff when actions being contemplated were in violation of  
20 statutes and City policies, or not in the best interest of the public.

21 13. Ms. Park ably executed her duties in her LAFD positions under four successive Fire  
22 Chiefs, all of whom lauded her work and increased her span of authority in recognition of her  
23 abilities and contributions. Her success in significantly reducing LAFD payouts was also  
24 acknowledged by both the City Attorney’s Office and the City’s Risk Reduction Cabinet.

25 14. In 2017, Ms. Park was subsequently promoted to Public Safety Employee Relations  
26 Manager, and in 2018 she was promoted to Fire Administrator. The Fire Administrator is a civilian  
27 Deputy Chief position that reports directly to the Chief Deputy of Administrative Operations.  
28 Other than Chief Crowley, Ms. Park was the highest-ranking female in the LAFD and the only

1 female on the Command Staff when she was terminated.

2 15. As Fire Administrator, Ms. Park oversaw an \$800M+ Budget, Revenue,  
3 Accounting, Audits, Contracts, EMS Billing and Records, Payroll, Human Resources,  
4 Employee/Labor Relations, Litigation, and Risk Management. During her lengthy tenure with the  
5 LAFD, Ms. Park was an exemplary employee and a highly regarded member of the Department  
6 Command Staff.

7 16. In March 2022, Kristin Crowley was appointed as the LAFD's first female and gay  
8 Fire Chief by then Mayor Eric Garcetti in a closed-door process, i.e., there was no announcement  
9 of an upcoming vacancy, no application process, and no invitation for prospective candidates to  
10 submit their interest. In February 2023, Chief Crowley named Orin Saunders as her Chief Deputy  
11 of Administrative Operations, the second highest ranking position in the Fire Department. Chief  
12 Saunders is an African-American, gay male. During Chief Saunders' command of Administrative  
13 Operations, Ms. Park expressed her concerns and complained about numerous decisions and  
14 actions of Chief Crowley and Chief Saunders, including but not limited to, Chief Crowley's  
15 ongoing failure to repay the City for a significant overpayment she had received in error;  
16 promotions not based on merit and in breach of Civil Service Rules; due process violations and  
17 the use of details as *de facto* punitive action; failure to enforce rules and regulations in a consistent,  
18 impartial manner; bad faith engagement in the interactive process for numerous LAFD employees  
19 who had requested reasonable accommodation; badgering and neglect of civilian personnel;  
20 violations of City contracting procedures and ethics rules, and other protected complaints.

21 17. Following Ms. Park's complaints, Chief Crowley and Chief Deputy Saunders  
22 began retaliating against Ms. Park by, including but not limited to, removing supervisory functions  
23 of Risk Management, Employee Relations, and Human Resources from Ms. Park's purview;  
24 excluding Ms. Park from staff meetings and interview panels; directing Ms. Park's colleagues to  
25 not engage with her; attempting to embarrass Ms. Park in front of other members of the Command  
26 Staff and intimidate her into silence; micromanaging Ms. Park's assignments; criticizing Ms.  
27 Park's concerns and questions; undermining Ms. Park's command of the Administrative Services  
28 Bureau; and, blaming Ms. Park for city-wide problems related to the new payroll system,

1 Workday. Chief Crowley's and Chief Saunders' harassment and retaliation caused enormous  
2 stress and anxiety for Ms. Park, harming her physical health, mental well-being, and financial  
3 security.

4 18. On September 26, 2023, Ms. Park learned that Chief Saunders had likely committed  
5 a violation of the City's contracting procedures and that he was attempting to award a contract to  
6 a third-party vendor that presented a conflict of interest. The following day, Ms. Park met with  
7 Deputy City Attorney Samuel Petty to report and discuss her concerns. On October 24, 2023,  
8 Plaintiff met with Special Investigator Dylan Gleadall from the Ethics Commission to whom she  
9 expressed her fear of retaliation by Chief Saunders for having exposed and blocked the proposed  
10 contract from moving forward.

11 19. On October 17, 2023, Ms. Park met with Chief Saunders and lodged a complaint  
12 about Chief Crowley's harassing and retaliatory behavior, and asked why Chief Deputy Saunders  
13 had done nothing to support her despite witnessing Chief Crowley's behavior. She also  
14 complained to Chief Saunders about his own harassing and retaliatory behavior and demanded that  
15 it stop. Ms. Park had been sharing her distress and frustration with colleagues regarding the  
16 ongoing harassment and retaliation, and informed several former and current high-ranking  
17 members of the Department that she had filed a complaint directly with Chief Saunders  
18 immediately after doing so.

19 20. On October 19, 2023, Ms. Park sought counsel from Ronnie Villanueva, Chief  
20 Deputy of Emergency Operations at the time, on how she should proceed if her complaint to Chief  
21 Saunders did not stop the retaliatory and harassing behavior. Chief Villanueva advised her to  
22 complain directly to Fire Commission President Genethia Hudley-Hayes if the investigation did  
23 not resolve the matter. Ms. Park informed Chief Villanueva that she would wait until after the  
24 winter holidays to see how the investigation progresses, and take further action with the Fire  
25 Commission if needed.

26 21. Unbeknownst to Ms. Park, Chief Saunders ignored his duty to have her complaint  
27 investigated by a neutral entity. Instead, on December 18, 2023, Chief Saunders informed Ms.  
28 Park that Chief Crowley had decided to terminate her employment. Ms. Park was instructed not

1 to come into her office after the end of that pay period. Since the day of that notice, Chief Crowley  
2 purposely shunned and avoided all contact with Ms. Park despite being in close proximity during  
3 several events. Ms. Park believes the termination was substantially motivated by her protected  
4 activities.

5 22. As further retaliation by the City, Ms. Park was denied the opportunity to use the  
6 full amount of her bank of compensated time off (CTO) which would have enabled her to be paid  
7 while seeking employment, facilitated a transfer to another City department, and allowed her to  
8 maintain health insurance coverage for herself and her children. The effective date of her  
9 termination was February 24, 2024.

10 **No Claims Arising from Privileged Conduct**

11 23. In the avoidance of doubt, Plaintiff does not herein allege any claim for damages  
12 as against Defendants for any privileged action, such as the conducting of an investigation by a  
13 public entity. Plaintiff, however, reserves the right to claim all damages arising out of  
14 *consequences or actions* resulting from, or occasioned by, such a privileged investigation by a  
15 public entity.

16 24. Plaintiff expressly excludes from this Complaint any privileged act by any  
17 Defendant to this action that would otherwise result in a Special Motion to Strike pursuant to Code  
18 Civ. Proc. § 425.16.

19 **Public Entity Liability for Wrongful Acts of Its Employees**

20 25. Pursuant to Gov. Code § 815.2, Defendant City of Los Angeles is liable for injury  
21 proximately caused by acts or omissions of its employees within the scope of their employment if  
22 the act or omission would , apart from this section, have given rise to a cause of action against that  
23 employee or his personal representative.

24 26. Further, pursuant to Gov. Code § 820, Defendants are liable for injuries caused by  
25 their acts or omissions to the same extent as a private person. Plaintiff further alleges that  
26 Defendants caused her injuries, as set forth in this complaint, and are therefore liable for damages  
27 arising out of those injuries as authorized by Gov. Code § 820.





1           33.     Here, as more fully alleged above, Plaintiff engaged in activity protected by section  
2 1102.5(b) and reported these violations to the LAFD and Defendant City, each of whom had  
3 authority of Plaintiff, and authority to investigate, discover, or correct the violations, and/or were  
4 government agencies.

5           34.     Defendants subjected Plaintiff to the adverse employment actions in retaliation for  
6 engaging in protected activities, such as her reporting or protesting violations of one or more of  
7 the following local, state, and/or federal statutes, rules and/or regulations such as: the Firefighters  
8 Procedural Bill of Rights regarding due process (*Government Code* § 3250 et seq); the California  
9 Fair Employment and Housing Act (California Gov. Code § 12900-12966); the Rules of the Board  
10 of Civil Service Commissioners City of Los Angeles related to promotions, including Section  
11 1009-1015; theft of City money by Chief Crowley due to overpayment and her failure/refusal to  
12 repay said sums and thus Plaintiff reasonably believed were a violation of California law, including  
13 *Penal Code* § 487.1; Misappropriation of Public Funds - Pen. Code § 424-42; Embezzlement -  
14 Pen. Code § 514; Fraud - Pen. Code § 532; Grand Theft - Pen. Code § 487; Violation of City  
15 Rules/Regulations related to bullying in the workplace/harassment/hazing in the workplace and  
16 more as fully set out in the City of Los Angeles Workplace Equity Policy; Violation of City  
17 Rules/Regulations pertaining to contracting procedures such as Division 10 of the City's Admin  
18 Code and Article 2 of Division 10 which outlines the competitive bid process.

19           35.     As alleged more fully above, Plaintiff's protected complaints about what she  
20 reasonably believed were local, state, and/or federal violations of law, rules, and/or regulations to  
21 City of Los Angeles officials were a substantial motivating reason for the retaliation Plaintiff  
22 experienced following these complaints including but not limited to, removing supervisory  
23 functions of Risk Management, Employee Relations, and Human Resources from Ms. Park's  
24 purview; excluding Ms. Park from staff meetings and interview panels; directing Ms. Park's  
25 colleagues to not engage with her; attempting to embarrass Ms. Park in front of other members of  
26 the Command Staff and intimidate her into silence; micromanaging Ms. Park's assignments;  
27 criticizing Ms. Park's concerns and questions; undermining Ms. Park's command of the  
28 Administrative Services Bureau; blaming Ms. Park's for city-wide problems related to the new

1 payroll system, Workday; and ultimately, her termination and denial of the use of compensated  
2 time so as to extend her earned benefits.

3 36. As a direct and proximate result of Defendant's retaliatory conduct, Plaintiff  
4 suffered and continues to suffer damage to her reputation and career, physical and mental and  
5 emotional injuries, pain, distress, suffering, anguish, shame, humiliation, embarrassment, and  
6 indignity, loss of enjoyment of life, and another non-economic damages, and is entitled to all  
7 damages, legal costs, and attorneys' fees.

8 37. As a further result of Defendants' retaliatory conduct, Plaintiff has suffered and will  
9 continue to suffer loss of income, wages, earnings, earning capacity, her ability to be selected for  
10 future employment, her ability to work, all of which will adversely affect her income and other  
11 benefits, and has caused irreparable harm to her retirement path.

12 38. As a result of the retaliatory acts of Defendants, as alleged herein, Plaintiff has  
13 incurred, and continues to incur, legal expenses and attorneys' fees, and is entitled to an award of  
14 attorneys' fees and costs pursuant to California *Labor Code* § 110.5(j).

15 **SECOND CAUSE OF ACTION**

16 **Wrongful Termination in Violation of Public Policy**

17 **Against All Defendants**

18 39. Plaintiff incorporates and re-alleges the allegations contained in paragraphs 1  
19 through 38 as though fully set forth herein.

20 40. At all times relevant, Plaintiff was employed by Defendant City of Los Angeles  
21 and was subsequently terminated from employment for reasons that violate public policy,  
22 including in response to her protected complaints about numerous decisions and actions of Chief  
23 Crowley and Chief Saunders, including but not limited to, Chief Crowley's ongoing failure to  
24 repay the City for a significant overpayment she had received in error; promotions not based on  
25 merit and in breach of Civil Service Rules; due process violations and the use of details as *de facto*  
26 punitive action; failure to enforce rules and regulations in a consistent, impartial manner; bad faith  
27 engagement in the interactive process for reasonable accommodation; badgering and neglect of  
28 civilian personnel; and, violations of City contracting procedures and ethics rules.

1           41. It is the public policy of the State of California to encourage employees to notify  
2 an appropriate government or law enforcement agency, person with authority over the employee,  
3 or another employee with authority to investigate, discover, or correct the violation or  
4 noncompliance, and to provide information to and testify before a public body conducting an  
5 investigation, hearing, or inquiry, when they have reason to believe their employer is violated a  
6 state or federal statute, or violating or not complying with a local, state or federal rule or regulation  
7 (*California Labor Code* § 1102.5). It is also against California Public Policy to terminate or  
8 retaliate against an employee who makes a complaint believed violated the following  
9 laws/rules/regulations such as those alleged above, including the Firefighters Procedural Bill of  
10 Rights regarding due process (*Government Code* § 3250 et seq); the California Fair Employment  
11 and Housing Act (*California Gov. Code* § 12900-12966); the Rules of the Board of Civil Service  
12 Commissioners City of Los Angeles related to promotions, including Section 1009-1015; theft of  
13 City money by Chief Crowley due to overpayment and her failure/refusal to repay said sums and  
14 thus Plaintiff reasonably believed were a violation of California law, including *Penal Code* §  
15 487.1; Misappropriation of Public Funds - *Pen. Code* § 424-42; Embezzlement - *Pen. Code* § 514;  
16 Fraud - *Pen. Code* § 532; Grand Theft - *Pen. Code* § 487; Violation of City Rules/Regulations  
17 related to bullying in the workplace/harassment/hazing in the workplace and more as fully set out  
18 in the City of Los Angeles Workplace Equity Policy; Violation of City Rules/Regulations  
19 pertaining to contracting procedures such as Division 10 of the City's Admin Code and Article 2  
20 of Division 10 which outlines the competitive bid process.

21           42. As alleged above, Plaintiff's protected complaints regarding what she reasonably  
22 believed were local, state, and/or federal law violations to company officials and the public were  
23 a substantial motivating reason for the retaliation Plaintiff experienced, including but not limited  
24 to: removing supervisory functions of Risk Management, Employee Relations, and Human  
25 Resources from Ms. Park's purview; excluding Ms. Park from staff meetings and interview panels;  
26 directing Ms. Park's colleagues to not engage with her; attempting to embarrass Ms. Park in front  
27 of other members of the Command Staff and intimidate her into silence; micromanaging Ms.  
28 Park's assignments; criticizing Ms. Park's concerns and questions; undermining Ms. Park's

1 command of the Administrative Services Bureau; and, blaming Ms. Park's for city-wide problems  
2 related to the new payroll system, Workday; and ultimately, her termination and denial of the use  
3 of compensated time so as to extend her earned benefits.

4 43. As a direct and proximate result of Defendant's wrongful termination of Ms. Park,  
5 Plaintiff suffered and continues to suffer damage to her reputation and career, physical and mental  
6 and emotional injuries, pain, distress, suffering, anguish, shame, humiliation, embarrassment, and  
7 indignity, loss of enjoyment of life, and another non-economic damages, and is entitled to all  
8 damages, legal costs, and attorneys' fees.

9 44. As a further legal result of Defendants' wrongful termination of Ms. Park, Plaintiff  
10 has suffered and will continue to suffer loss of income, wages, earnings, earning capacity, her  
11 ability to be selected for future employment, her ability to work, all of which will adversely affect  
12 her income and other benefits, and has caused irreparable harm to her retirement path.

13 45. As a result of Defendants' wrongful termination of Ms. Park, as alleged herein,  
14 Plaintiff has incurred, and continues to incur, legal expenses and attorneys' fees, and is entitled to  
15 an award of attorneys' fees and costs pursuant to California *Labor Code* § 110.5(j).

16 **THIRD CAUSE OF ACTION**

17 **Retaliation in Violation of the Fair Employment and Housing Act**

18 **Against All Defendants**

19 46. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1  
20 through 45 as though fully set forth herein.

21 47. As articulated more fully above, Plaintiff engaged in protected activities, including  
22 but not limited to complaining about the failure of the department to appropriately engage in the  
23 interactive process for numerous LAFD employees who had requested reasonable  
24 accommodations.

25 48. Plaintiff's protected activity was a motivating reason for the Defendants' decision  
26 to, among other things, removing supervisory functions of Risk Management, Employee  
27 Relations, and Human Resources from Ms. Park's purview; excluding Ms. Park from staff  
28 meetings and interview panels; directing Ms. Park's colleagues to not engage with her; attempting

1 to embarrass Ms. Park in front of other members of the Command Staff and intimidate her into  
2 silence; micromanaging Ms. Park's assignments; criticizing Ms. Park's concerns and questions;  
3 undermining Ms. Park's command of the Administrative Services Bureau; and, blaming Ms.  
4 Park's for city-wide problems related to the new Workday payroll system, her termination, and  
5 otherwise altering the terms, conditions, or privileges of her employment.

6 49. As a direct and proximate result of Defendant's retaliatory conduct, Plaintiff  
7 suffered and continues to suffer damage to her reputation and career, physical and mental and  
8 emotional injuries, pain, distress, suffering, anguish, shame, humiliation, embarrassment,  
9 indignity, loss of enjoyment of life, and another non-economic damages, and is entitled to all  
10 damages, legal costs, and attorneys' fees.

11 50. As a further result of Defendants' retaliatory conduct, Plaintiff has suffered and will  
12 continue to suffer loss of income, wages, earnings, earning capacity, her ability to be selected for  
13 future employment, her ability to work, all of which will adversely affect her income and other  
14 benefits, and has caused irreparable harm to her retirement path.

15 51. As a result of the retaliatory acts of Defendants, as alleged herein, Plaintiff has  
16 incurred, and continues to incur, legal expenses and attorneys' fees, and is entitled to an award of  
17 attorneys' fees and costs pursuant to California *Government Code* § 12965(b).

18 **PRAYER FOR RELIEF**

19 **WHEREFORE**, Plaintiff prays for Judgment against The City of Los Angeles and  
20 DOES 1 through 10, inclusive, and collectively as follows:

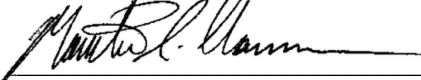
- 21 1) For loss of wages, income, earnings, earning capacity, benefits and other economic  
22 damages in an amount to be ascertained according to proof;
  - 23 2) For physical, mental and emotional injuries, pain, distress, suffering, anguish,  
24 anxiety, same, humiliation, embarrassment, indignity, and other non-economic  
25 damages, in an amount to be ascertained according to proof;
  - 26 3) For other actual, consequential, and/or incidental damages in an amount to be  
27 ascertained according to proof;
- 28

- 1 4) For attorneys' fees and costs pursuant to *Labor Code* § 1102.5(j), *Civil Code* § 1021.5  
2 and/or *Government Code* § 12965(b).  
3 5) For Plaintiff's costs of suit;  
4 6) For pre-judgment and post-judgment interest, at the legal rate; and  
5 7) For such other and further relief as the Court deems appropriate and just.

6 Respectfully submitted,

7  
8 Dated: December 12, 2024

AARONS WARD, APC



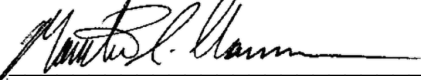
Martin I. Aarons  
Shannon H.P. Ward  
Attorneys for Plaintiff

10  
11  
12  
13  
14 **DEMAND FOR JURY TRIAL**

15 Plaintiff hereby demands a trial by jury.

16  
17 Dated: December 12, 2024

AARONS WARD, APC



Martin I. Aarons  
Shannon H.P. Ward  
Attorneys for Plaintiff