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14 **UNLIMITED JURISDICTION**  
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **FOR THE COUNTY OF LOS ANGELES**  
17 **NORTH DISTRICT**

18 SHEA SANNA,

19 Plaintiff,

20 vs.

21 COUNTY OF LOS ANGELES, a  
22 municipality, GEORGE GASCÓN, in his  
23 official and individual capacities, and  
24 DOES 1 to 49, inclusive,

25 Defendants.

Case No.

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF:**

- 26 **1. WHISTLEBLOWER RETALIATION  
(LABOR CODE § 1102.5)**
- 27 **2. INTENTIONAL INFLECTION OF  
EMOTIONAL DISTRESS**

**DEMAND FOR JURY TRIAL**

1 Plaintiff Shea Sanna (“Plaintiff” or “Sanna”), by and through his attorneys, Dhillon Law Group  
2 Inc., brings this action against Defendants County of Los Angeles (also referred to as “Los Angeles  
3 County”), George Gascón, in his official and individual capacities, and DOES 1 to 49 (collectively,  
4 “Defendants”), seeking damages and injunctive relief for whistleblower retaliation (Lab. Code, §  
5 1102.5) and intentional infliction of emotional distress, and alleges as follows:

## 6 INTRODUCTION

7 1. This case involves a prosecutor who prioritized his legal and ethical obligations over the  
8 political interests of his superiors, and incurred their wrath as a result. Deputy District Attorney Shea  
9 Sanna sought to present relevant evidence while prosecuting a child molester who happened to be a few  
10 days short of his 18th birthday when he sexually assaulted a 10-year-old girl. Because the case garnered  
11 extensive media coverage critical of Los Angeles County District Attorney George Gascón’s progressive  
12 policies, Gascón prevented Sanna from presenting relevant evidence to the court and removed him from  
13 the case. When Sanna reported that Gascón’s conduct violated established policy and ethics rules  
14 regarding the presentation of relevant evidence, the Gascón administration retaliated against Sanna,  
15 launching sham investigations to suspend him on absurd grounds.

16 2. The Gascón administration also retaliated against Sanna for reporting other violations of  
17 law, including the suppression of evidence and violations of Marsy’s law by DDA Alisa Blair, a Special  
18 Advisor to Gascón, and the illegal and unauthorized release of confidential, statutorily protected peace  
19 officer files to the media by Diana Teran, also a Special Advisor to Gascón, who was later indicted by  
20 the California Department of Justice on 11 felony counts based on this conduct.

21 3. Gascón publicly admitted that he attempted to “sideline” Sanna and other deputy district  
22 attorneys who do not agree with his ideological vision of the department, and has expressed his frustration  
23 that he cannot fire Sanna without cause.<sup>1</sup>

24  
25  
26  
27  
28 <sup>1</sup> LA Progressive, *Los Angeles County District Attorney George Gascón chats with LA Progressive  
publishers*, YouTube (May 2, 2023),  
<https://youtu.be/xNnK51KJKd8?si=3xBnv95nn6ydLNLR&t=874>.

1 **THE PARTIES**

2 4. Plaintiff Shea Sanna is a resident of California and, as of the filing of this Complaint,  
3 employed as a Deputy District Attorney (“DDA”) by Los Angeles County District Attorney’s Office  
4 (“LADA”).

5 5. Defendant County of Los Angeles is a public entity duly organized and existing under the  
6 laws of the State of California. LADA falls within the jurisdiction and is a subsidiary agency of Los  
7 Angeles County.

8 6. Defendant George Gascón is the District Attorney (“D.A.”) of Los Angeles County, sued  
9 in his official and individual capacities. Sanna is informed and believes, and on that basis alleges, that  
10 Defendant Gascón resides in Los Angeles County.

11 7. The true names or capacities, whether individual, corporate, associate or otherwise, of  
12 Defendants Doe One to Doe Forty-Nine, inclusive, are unknown to Sanna, who therefore sues said  
13 Defendants by such fictitious names. Sanna will amend his complaint by inserting the true names or  
14 capacities, with appropriate charging allegations, when the same is ascertained. Sanna is informed,  
15 believes, and based thereon alleges, that each of the Defendants named herein as a Doe is negligently or  
16 in some other manner responsible for the events and happenings herein referred to and were a cause of  
17 the injury and damages to Sanna alleged herein.

18 8. Sanna has complied with and exhausted any applicable claims statutes, administrative  
19 remedies, internal remedies, and grievances procedures, or is excused from complying therewith. After  
20 filing a government claim with the County on March 27, 2024, and an amended government claim on  
21 April 29, 2024, Sanna received a rejection letter from Carl Warren & Company on May 16, 2024.

22 **JURISDICTION AND VENUE**

23 9. Jurisdiction is proper in the County of Los Angeles because it has general subject matter  
24 jurisdiction and no statutory exceptions to jurisdiction exist.

25 10. Venue is proper in this Court pursuant to County of Los Angeles Local Rule (“L.R.”)  
26 2.3(a)(1)(B) because the employment contract at issue was performed in the North District of Los Angeles  
27 County.

28

1 **FACTUAL ALLEGATIONS**

2 11. In 2015, Shea Sanna received his *juris doctor* degree from Southwestern Law School,  
3 graduating 1<sup>st</sup> in his class from Southwestern’s SCALE® 2-year JD Program.

4 12. In February 2018, LADA hired Sanna as a Deputy District Attorney. Sanna first worked  
5 at LADA’s Clara Shortridge Foltz Criminal Justice Center from May 2018 to September 2018. From  
6 September 2018 to December 2018, Sanna was assigned to LADA’s Glendale Office. In December 2018,  
7 he was reassigned to the Santa Clarita Office, where he worked until August 2021. Sanna was then  
8 transferred to the Antelope Valley Office, where he worked from August 2021 to October 2023.

9 13. For the first four years of his career, Sanna maintained an impeccable personnel record,  
10 with no disciplinary actions and consistently excellent performance reviews from his supervisors.

11 14. But in early 2022, Sanna’s once promising career trajectory was derailed when he publicly  
12 revealed how Gascón’s policies had led to a miscarriage of justice in the Tubbs case, nearly resulting in  
13 the release of a highly dangerous and violent sexual predator. Sanna also exposed how the Gascón  
14 Administration had suppressed evidence and directed Sanna not to oppose defense counsel’s arguments  
15 in order to secure Tubbs’s release.

16 ***The Tubbs Case***

17 15. On New Year’s Day, 2014, James Tubbs sexually assaulted a 10-year-old girl in the  
18 bathroom at a Denny’s in Palmdale. At the time of the assault, Tubbs was a few days shy of his 18th  
19 birthday.

20 16. The Palmdale incident is one of many on Tubbs’s lengthy criminal record. To date, Tubbs  
21 has been convicted of sexual penetration by use of force of a victim under 14, assault with a deadly  
22 weapon causing great bodily injury, battery, battery causing great bodily injury, domestic violence, felony  
23 assault, resisting arrest, theft, and voluntary manslaughter.

24 17. Tubbs is a suspect in two other sexual assault cases where he was caught in the act of  
25 sexually assaulting children—both of whom were 4-year-old girls—in public restrooms.

26 18. In May 2022, Tubbs was charged with robbery and murder for allegedly crushing a man’s  
27 skull with a rock and discarding the victim’s body in the Kern River.



1 with a foreign object, and forcible oral copulation was an oversight, as it  
2 makes no sense to include one but not the other, and in all policy  
3 directives by this office preceding 20-09 and in virtually all Penal and  
4 Welfare and Institutions Code lists, these crimes are always listed  
5 together. Therefore I have directed our AV office to file one count of  
6 Forcible Sexual Penetration of Victim Under 14 by a Foreign Object PC  
7 289(a)(1)(B), which is a strike. It will make this former minor eligible for  
8 DJJ [Division of Juvenile Justice], and if he is committed to DJJ, he will  
9 have to register as a sex offender. There is no alternative, non-strike  
10 offense available that, per SD II 2, “corresponds to the alleged conduct .  
11 . . .” As such, I see our options are to file a strike or to not file at all. This  
12 former minor appears to me to be an extreme public safety risk. Accurate  
13 charges are imperative, as is DJJ. . . .

14 Further, it is extremely important that a record of this offense be created,  
15 as this former minor has the hallmarks of a sexual predator. We will seek  
16 sexual offender registration. The policy seems to allow it in an extreme  
17 case, and this is. . . .

18 [P]lease note my serious concern in us setting ourselves up to limit our  
19 ability to prove the charges against this minor, . . . Our victim was 10  
20 years old. . . . She is desirous of prosecution. We owe it to her to plead  
21 this case in a fashion that ensures our ability to prevail at adjudication so  
22 that she does not go through the trauma of this experience only to have us  
23 lose the case on a filing or proof technicality.

24 25. Despite the well-reasoned concerns in Randolph’s request, the Gascón administration  
25 informed her that, while she could bring a charge akin to forcible rape, she could neither bring more than  
26 one charge nor file a motion to prosecute the now 25-year-old Tubbs as an adult under Special Directive  
27 20-06.

#### 28 *Sanna is Assigned to the Tubbs Case*

29 26. On October 28, 2021, Sanna was assigned to the Tubbs case.

30 27. On November 22, 2021, Tubbs called his father from jail. A review of the recordings of  
31 this and other calls, some of which were eventually released the following year, makes clear that Tubbs  
32 planned to claim insincerely that he was transgender in order to obtain favorable housing in a women’s  
33 juvenile facility. To the best of Sanna’s knowledge, Tubbs is not transgender.

34 28. On the recordings, Tubbs and his father laughed and joked about his “transition” and his  
35 chosen name of “Hannah.” Tubbs informed his father that although it would be difficult, his father needed  
36 to refer to him as Hannah in court and use female pronouns. At all other times, Tubbs’s intimate  
37 acquaintances used male pronouns when referring to him over the phone.  
38



1           38.     The following day, Sanna and his direct supervisor, Deputy-in-Charge (“DIC”) Andre  
2 Holmes of Antelope Valley’s Juvenile Office, met with Blair and Chief Deputy Woo remotely to discuss  
3 their strategy for the Tubbs hearing.

4           39.     During this meeting, Sanna expressed his intent to request that Tubbs be housed in county  
5 jail as an SYTF, as the Department of Probation had recommended. But Blair disagreed, arguing that  
6 Sanna “did not have a legal leg to stand on” in arguing that county jail could be substituted as an SYTF.  
7 Essentially, Blair was parroting word-for-word the same arguments Tubbs’s defense attorney, Elizabeth  
8 Braunstein, made orally in court and in her motion.

9           40.     Also during this meeting, DIC Holmes mistakenly referred to Tubbs using male pronouns,  
10 despite Tubbs’s formal yet demonstrably disingenuous request to transition genders, change his name to  
11 “Hannah,” and be referred to using female pronouns to receive favorable housing.

12           41.     By the end of the meeting, Blair and Woo informed Sanna that he was to let probation  
13 argue housing, refrain from arguing that Tubbs could be housed in county jail, and ignore the arguments  
14 in defense counsel’s supplemental moving papers that county jail could not meet the definition of a SYTF.

15           42.     Following these discussions, it became clear to both Sanna and DIC Holmes that Woo  
16 and Blair were attempting to manipulate Sanna into not contesting Tubbs’ housing and pressuring him to  
17 remain silent during the upcoming hearing.

18           43.     As revealed in the recorded calls between Tubbs and his father, Tubbs and his attorney  
19 had planned to orchestrate his immediate release by having the court determine that county jail did not  
20 meet the definition of a SYTF, thereby making it impossible for probation to house Tubbs in a SYTF.  
21 Tubbs’s attorney had been advocating for him to be released as “Home on Probation,” which would  
22 automatically terminate because Tubbs was over 25 years old.

23           44.     In effect, Woo and Blair pressured Sanna to remain silent during the hearing, refrain from  
24 presenting relevant evidence (Tubbs’s jail call recordings) to the court or countering the defense’s legal  
25 arguments, and acquiesce to Tubbs’s release.

26           45.     On January 27, 2022, Tubbs again appeared in court for a hearing on the Probation  
27 Department’s petition that he be housed in county jail. The court ultimately denied the petition, finding  
28 that LADA had multiple opportunities to transfer the case to the adult criminal court and seek housing in



1 county jail, but had failed to do so. When Sanna attempted to play Tubbs's jail calls in open court, the  
2 court prevented him from doing so, reasoning that the calls were only relevant if it had the power to send  
3 Tubbs to county jail, which it had already concluded that it did not because LADA had failed to transfer  
4 the case. The court sentenced Tubbs to two years in a juvenile facility and denied the petition to house  
5 Tubbs in an adult facility.

6 46. After the hearing, Sanna gave his first interview to the media regarding the Tubbs case.

7 47. On January 31, 2022, Tubbs's Multi-Disciplinary Treatment (MDT) meeting was held.  
8 While the meeting was ongoing, Sanna sent an email to the members of Tubbs's rehabilitation team with  
9 the recordings of Tubbs's 256 jail calls attached. As summarized in Sanna's email, these calls plainly  
10 show: (1) Tubbs is not sincere about identifying as transgender; (2) Tubbs is extremely racist; (3) Tubbs  
11 is violent and dangerous; (4) Tubbs is a sexual deviant and has sexual compulsion issues that crop up in  
12 nearly every conversation; (5) Tubbs had bragged about the lack of consequences under Gascón's current  
13 policy and how he was working the system; and (6) Tubbs made a statement about harming the Judge in  
14 his case. Sanna also emailed all 256 jail calls to Assistant Head Deputy of Juvenile, Frank Santoro, and  
15 DDA Jennifer Gowan. Sanna made it clear that he intended to play the recordings for the court during the  
16 MDT hearing so the court could consider the information when determining the terms of Tubbs  
17 rehabilitation plan.

18 48. The day after Sanna forwarded the recordings, the Gascón administration retaliated  
19 against him and removed him from the Tubbs case. Assistant Head Deputy Frank Santoro emailed  
20 Sanna's direct supervisor, DIC Andre Holmes, requesting that he forward the recordings of the Tubbs  
21 calls to Head Deputy Phil Glaviano and DDA Jennifer Gowen, whom LADA had assigned to take over  
22 the case from Sanna. Although a hearing in the Tubbs case was set for the following day, Gowen had yet  
23 to review the case file.

24 49. It was clear during this hearing that neither Gowen nor the multi-disciplinary team that  
25 wrote the report had reviewed the recordings of Tubbs's jail calls. The report was primarily based on the  
26 representations of Tubbs, his attorney, and his father. The court did not ask any questions, which Gowen  
27 likely would not have been properly prepared to answer, and rubber stamped the report.

28

1           50.     In the following weeks, Sanna learned that Tubbs had requested a large wall mounted flat-  
2 screen T.V., a PlayStation 5, and a dog; changed his name to Star; and was consistently referring to  
3 himself as a “grown ass man” when arguing with guards.

4           51.     As exemplified above, Gascón’s policies and his enforcement of them required Sanna and  
5 other prosecutors to unlawfully hide the truth from the court by withholding relevant evidence, such as  
6 Tubbs’s jail call recordings, and prevented the filing of all “truthful charges.”

7           52.     Practically speaking, this directed Sanna to violate a host of prosecutorial and ethical  
8 obligations, including:

- 9           (a)     **Marsy’s Law, Cal. Const., Art. 1, § 28** (“[R]elevant evidence shall  
10 not be excluded in any criminal proceeding, including pretrial and  
11 post-conviction motions and hearings, or in any trial or hearing of a  
12 juvenile for a criminal offense, whether heard in juvenile or adult  
13 court”);
- 14           (b)     **Government Code § 26540** (“A district attorney shall not during his  
15 incumbency . . . assist in the defense of . . . any person accused of  
16 any crime in any county”);
- 17           (c)     **California State Bar Rule 3.3, Candor Toward the Tribunal** (“A  
18 lawyer shall not . . . knowingly make a false statement of fact or law  
19 to a tribunal [or] fail to correct a false statement of material fact or  
20 law previously made to the tribunal”);
- 21           (d)     **California State Bar Rule 3.8, Special Responsibilities of a  
22 Prosecutor** (“The prosecutor in a criminal case shall . . . make timely  
23 disclosure . . . of all evidence or information known to the  
24 prosecutor”);
- 25           (e)     **ABA Standards for Criminal Justice: Prosecution Function, 3-  
26 1.2, Functions and Duties of the Prosecutor** (“The primary duty of  
27 the prosecutor is to seek justice within the bounds of the law . . . The  
28 prosecutor serves the public interest and should act with integrity and  
balanced judgment to increase public safety. . . . The prosecutor  
should avoid an appearance of impropriety in performing the  
prosecution function”);
- (f)     **ABA Standards for Criminal Justice: Prosecution Function, 3-  
1.4, The Prosecutor’s Heightened Duty of Candor** (“In light of the  
prosecutor’s public responsibilities, broad authority and discretion,  
the prosecutor has a heightened duty of candor to the courts and in  
fulfilling other professional obligations”); and

1 (g) **ABA Standards for Criminal Justice: Prosecution Function, 3-**  
2 **1.5, Preserving the Record** (“At every stage of representation, the  
3 prosecutor should take steps necessary to make a clear and complete  
4 record for potential review”).

5 *The Tubbs Recordings Are Released*

6 53. On or around February 16, 2022, Gascón informed a reporter that in his opinion, “**the**  
7 **Tubbs case still does not belong in adult court.**” At this time, Gascón and his office had been in  
8 possession of the Tubbs recordings for over two weeks.<sup>3</sup>

9 54. On or around February 21, 2022, a rumor began to circulate that various news outlets had  
10 possession of the Tubbs recordings and planned to release them in the near future. Having almost certainly  
11 heard the recordings himself or been informed of their contents, Gascón attempted to get out in front of  
12 the predicable backlash by walking back his prior support for Tubbs and his unquestioned acceptance of  
13 Tubbs’s purported gender transition.

14 55. “It’s unfortunate that she gamed the system,” Gascón told the *L.A. Times* on February  
15 21st. “**If I had to do it all over again,**” he said, “**she would be prosecuted in adult court.**” This marked  
16 a complete reversal of Gascón’s public position just five days prior.<sup>4</sup>

17 56. On or around February 22, 2022, portions of the Tubbs jail call recordings were released  
18 to the media and public. *L.A. Times* journalist James Queally, once a supporter of Gascón, published an  
19 article that was highly critical of Gascón’s handling of the Tubbs case. Various national news outlets also  
20 began covering the Tubbs recordings, and many in the public were outraged that Gascón’s policies  
21 effectively compelled the matter to be mishandled, resulting in the potential release of a violent and  
22 dangerous criminal.

23 57. The next day, Sanna’s supervisor warned him that the Gascón administration was “coming  
24 for him” and advised him to save everything and be careful.

25 <sup>3</sup> Stoltze, Frank, “LA DA Gascón Reverses Course, Now Open To Charging Some Juveniles As  
26 Adults,” *LAist* (Feb. 16, 2022), [https://laist.com/news/criminal-justice/la-da-Gascón-reverses-course-  
now-open-to-charging-some-juveniles-as-adults](https://laist.com/news/criminal-justice/la-da-Gascón-reverses-course-now-open-to-charging-some-juveniles-as-adults).

27 <sup>4</sup> Harriet Ryan & James Queally, “Why L.A. D.A. Gascón Reversed Himself on Sentencing of  
28 Woman Who Assaulted 10-Year-Old,” *L.A. Times* (Feb. 21, 2022),  
[https://www.latimes.com/california/story/2022-02-21/Gascón-reversed-himself-sentence-hannah-  
tubbs-who-assaulted-child](https://www.latimes.com/california/story/2022-02-21/Gascón-reversed-himself-sentence-hannah-tubbs-who-assaulted-child).

1           58.     On information and belief, following Sanna’s public opposition to Gascón’s suppression  
2 of evidence and mishandling of the Tubbs case, Gascón perceived Sanna as disloyal and sought to make  
3 an example out of him as a cautionary note to the many district attorneys who disagreed with his inflexible  
4 policies.

5           ***DDA Alisa Blair Covertly Works to Secure the Release of Convicted Murderer Andrew Cachu***

6           59.     Also in February 2022, it came to Sanna’s attention that DDA Alisa Blair—the Special  
7 Advisor to District Attorney Gascón who had directed Sanna to suppress evidence and withhold  
8 arguments in the Tubbs case—had deliberately sabotaged other cases by making misrepresentations to  
9 the court and obstructing justice.

10          60.     Specifically, Sanna learned of Blair’s conduct in November 2021, when she actively  
11 worked to secure the release of convicted killer Andrew Cachu, 6 years into his 50-year murder sentence.<sup>5</sup>

12          61.     As revealed in recordings of jail calls between Cachu and his mother, Blair had made it  
13 clear that she, a Special Advisor to District Attorney Gascón, was in fact working on behalf of the  
14 convicted murderer, Cachu, rather than the family of the victim seeking justice or the people of Los  
15 Angeles County.

16          62.     In the jail calls, Cachu’s mother ecstatically informs her son that at the hearing, Blair told  
17 her “don’t worry about it,” and gave her a look that said, “don’t worry girl, I’ve got you.” Blair later  
18 called Cachu’s mother directly to confirm that “everything would be all right,” implying that she would  
19 ensure that her son was released from prison 6 years into his 50-year murder sentence.

20          63.     Cachu’s mother then told her son in complete disbelief: “The district attorney is on our  
21 side—THAT IS CRAZY!”

22          64.     To ensure Cachu’s release, Blair filed a motion to transfer him to juvenile court, then  
23 failed to present any evidence in support of that motion.

24          65.     Without supporting evidence, the judge had no option but to release Cachu.

25          66.     Within seven months of his release, Cachu was arrested and charged with possession of a  
26 firearm by a felon, possession for sale of methamphetamine, possession for sale of cocaine, felony counts

27  
28 <sup>5</sup> See ABC News, “LA County D.A. Gascón under fire as convicted killer set to be released 6 years  
into 50-year sentence,” <https://abc7.com/george-Gascón-la-county-da-los-angeles-crime-andrew-cachu/11217396/>.

1 of fleeing a pursuing peace officer's vehicle and driving against traffic, and misdemeanor counts of  
2 driving under the influence, possession of cannabis for sale, and possession of a controlled substance with  
3 a firearm.

4 67. Upon hearing the Cachu jail recordings, Sanna turned the recordings over to the California  
5 Department of Justice, Criminal Division.

6 68. Sanna raised his concerns about DDA Blair to DIC Holmes and other Deputy District  
7 Attorneys in the office. Specifically, he explained that Blair was deliberately sabotaging cases, violating  
8 Marsy's Law, making misrepresentations to the court, obstructing justice, and violating Government  
9 Code § 26540, which prevents prosecutors from defending or assisting in the defense of anyone accused  
10 of a felony, misdemeanor, or traffic infraction.

11 69. On February 25, 2022, after his initial complaint went unheeded, Sanna posed the  
12 following question to Alisa Blair on Twitter: "Will they be discussing your administration's policy of  
13 sabotaging cases and covering it up? If so, I'm aware of some emails and recordings they could use in  
14 their presentation. @LACountyADDA @jonathanhatami @JamesQueallyLAT @BillFOXLA  
15 @melG679."

16 ***The Gascón Administration's Retaliation Campaign Against Sanna***

17 70. On March 1, 2022, Frank Pinela, a Senior Investigator for LADA, filed a complaint  
18 against Sanna on behalf of Alisa Blair (Complaint No. 2022-112062).

19 71. When Sanna requested clarification on the allegations against him two-days later, the only  
20 information provided was that it alleged "third-party harassment" against him for misgendering Tubbs.

21 72. The Gascón administration instigated this complaint, notwithstanding that (1) it was in  
22 possession of the Tubbs recordings and had been for months; (2) the recordings document how Tubbs  
23 devised a plan to transition to female to obtain favorable housing in a young women's facility, and how  
24 his gender transition was thus a ruse; (3) Gascón *himself* publicly stated that he questioned the sincerity  
25 of Tubbs's gender transition, acknowledged that Tubbs had attempted to game the system, and explained  
26 that if he had to do it over again, he would have tried Tubbs as an adult; and (4) **the statements that**  
27 **formed the basis of the "third-party harassment" complaint for misgendering Tubbs were actually**  
28

1 **made by DIC Holmes** during the meeting on January 26, 2022, not by Sanna, as Holmes himself  
2 admitted.

3 73. Tellingly, the complaint filed against Sanna on Blair’s behalf was not filed in the wake of  
4 the January 26th meeting; rather, it was filed more than a month later, immediately following (1) the  
5 release of the Tubbs recordings to the media, and (2) Sanna’s disclosure of DDA Blair’s violations of  
6 Marsy’s Law and Government Code § 26540.

7 74. On April 19, 2022, Woo also filed a complaint against Sanna rehashing the same  
8 allegations as Blair’s complaint (Complaint No. 2022-113127). Because they presented the same  
9 allegations, Woo and Blair’s complaint were combined for purposes of investigation.

10 75. Also on April 19, 2022, Sanna emailed Head Deputy Phillip Glaviano and requested that  
11 he appear on the Tubbs case again. Sanna explained in detail why his familiarity with the case would  
12 make him a valuable asset, and copied everyone in his chain of command. Still, the Gascón administration  
13 denied his request.

14 76. ADA Victoria Adams, who had been copied on the email, sided with Sanna, agreeing that  
15 his familiarity with the case placed him in a better position to inform the court of Tubbs’s prior history  
16 than Gowen alone. She attempted to convince Chief Deputy Woo that Sanna should be placed back on  
17 the case, but her request was likewise denied. Based on her conversation with Woo, Adams believed that  
18 Woo’s refusal to allow Sanna to appear at the hearing amounted to an attempt to keep critical information  
19 from the court in violation of California Rule of Professional Conduct 3.3.

20 77. On May 10, 2022, thanks in large part to Sanna’s efforts, Tubbs was charged with the  
21 2019 murder of Michael Clark. Back in April 2019, Tubbs allegedly bashed Clark’s head in with a rock  
22 and threw his body into the Kern River. In November 2023, Tubbs pled guilty to voluntary manslaughter  
23 and was sentenced to 15 years in prison. But importantly for the public, Tubbs remains in custody at the  
24 California Institution for Men in Kern County.

25 78. Gascón and his inner circle—including Alisa Blair, Sharon Woo, and Chief of Staff  
26 Joseph Iniguez—knew that Sanna had played a role in Tubbs being charged with murder.

27 79. Contrary to the expected reaction of a district attorney whose prosecutor played a pivotal  
28 role in charging a heinous murder, Gascón was *livid*. Why? Because it furthered the narrative that

1 Gascón’s policies were ineffective and supported Sanna’s position that Tubbs was a dangerous individual  
2 that should have been tried as an adult initially.

3 80. The day Tubbs was charged with murder, Gascón’s office immediately began calling  
4 Sanna’s department nonstop. It became so hectic that Sanna’s Deputy-in-Charge, Andre Holmes, asked  
5 Sanna to transport boxes 50 miles away to Santa Clarita just so Sanna could escape the fray.

6 ***Sanders Roberts LLP Investigates the Frivolous Complaints Against Sanna***

7 81. On July 12, 2022, Sanna received an email from Christine Diaz-Herrera, an attorney with  
8 Sanders Roberts LLP, explaining that she would be leading her firm’s administrative investigation of the  
9 complaints made against Sanna earlier in the year.

10 82. Sanders Roberts is a private law firm that represents Gascón and the LADA in pending  
11 litigation, which raises the question of whether it can serve as an impartial investigator of claims related  
12 to Gascón and the LADA.

13 83. In her email, Diaz-Herrera informed Sanna that he was alleged to have violated various  
14 provisions of the LADA Personnel Policies Handbook, including: the “General Policy” (§ 7.01.00);  
15 “Misuse of County Department Resources and Equipment” (§ 7.05.00); “Confidential and Sensitive  
16 Information Policy” (§ 7.12.00); and “Public Statements” (§ 7.16.00).

17 84. Upon learning of these alleged violations, Sanna requested additional information about  
18 their factual basis. After numerous emails back and forth, Diaz-Herrera finally informed Sanna that she  
19 was investigating “whether [he] has made false representations about pending Los Angeles County  
20 criminal court cases via social media and the news media from 2021 to present,” as well as “the  
21 appropriateness of [his] language regarding defendants.”

22 85. Later that month, on July 26, 2022, DIC Holmes received a curious demand from  
23 Gascón’s office: to complete a full performance evaluation for Sanna within three days. Holmes  
24 expressed his frustration to Sanna that three days was an unusually short amount of time to draft an  
25 evaluation.

26 ***The L.A. Times Covers Gascón’s “clash” with Sanna***

27 86. On August 5, 2022, the *L.A. Times* published an article entitled, “Outspoken prosecutor  
28 who clashed with Gascón now target of internal investigation: Shea Sanna, a prosecutor who criticized

1 D.A. George Gascón’s handling of a controversial abuse case, says he’s now being investigated in  
2 retaliation.”<sup>6</sup>

3 87. DDA Alisa Blair’s quotes to the *L.A. Times* continued to perpetuate the canard that the  
4 DA’s office had no reason to doubt the sincerity of Tubbs’s gender transition: “It became clear in the  
5 Hannah Tubbs case,” Blair told the *Times*, “that [Sanna’s] misgendering was intentional and not just a  
6 mistake based on the petition having a male name.”

7 88. In her statements to the *Times*, Blair neglected to mention (1) that the complaint filed on  
8 her behalf was made *less than one week* after Sanna had publicly challenged her on Twitter regarding her  
9 suppression of evidence in the Tubbs and Cachu cases, or (2) that it had been DIC Holmes, not Sanna,  
10 who had referred to Tubbs using male pronouns.

### 11 *The Innocuous “Hyena” Analogy*

12 89. The *L.A. Times* article also revealed that LADA intended to use another set of facts in  
13 support of the retaliatory investigations it launched against Sanna. In October 2021, Sanna had played a  
14 video in open court of three defendants swarming around a victim as they assaulted and robbed him, and  
15 described the assailants’ behavior during the attack as resembling a pack of hyenas swarming their prey—  
16 i.e., encircling the victim and foreclosing routes of escape. All four individuals including the victim were  
17 black. In the complaint filed against Sanna, it was alleged by an anonymous LADA official that his hyena  
18 comment was racist.

19 90. The anonymous LADA official turned out to be DDA Alisa Blair, who was not present  
20 during this proceeding and did not hear the statement.

21 91. Multiple witnesses were in the court when Sanna made the remark, and as far as he knows,  
22 no one else present had interpreted the comment as racist. Three of those witnesses later submitted  
23 statements on Sanna’s behalf and explained that his remarks had no racist undertones whatsoever:

24 (a) **Tracy Cephers (Deputy Probation Officer; Court Officer for**  
25 **L.A. County Probation):** “I am an African American woman who

26 <sup>6</sup> James Queally, “Outspoken prosecutor who clashed with D.A. Gascón now target of internal  
27 investigation: Shea Sanna, a prosecutor who criticized D.A. George Gascón’s handling of a  
28 controversial abuse case, says he’s now being investigated in retaliation,” *L.A. Times* (Aug. 5, 2022),  
<https://www.latimes.com/california/story/2022-08-05/prosecutor-in-controversial-hannah-tubbs-now-subject-of-l-a-d-a-s-office-investigation>.



1 has had many experiences with racism in my 55 years and at no time  
2 did I take any offense with Mr. Sanna's reference. His statement was  
3 about the behavior, not the race of the minors. His statement was  
4 completely taken out of context. . . . The reference Mr. Sanna made  
5 was to the predatory behavior in which they attacked the victim. . . .  
6 Having worked with Mr. Sanna for over two years, not once has he  
7 ever stated or alluded to anything that would make me believe he is  
8 racist. I have witnessed him handle many cases and he has shown no  
9 racism towards any minor at all. He has conducted himself in the  
10 most professional manner and has treated every youth based on the  
11 law and their alleged crime. PERIOD. . . . So, for anyone to say it  
12 was a racial statement is offensive to me, Again, I will reiterate that  
13 having been on the receiving end of racist comments a thousand  
14 times over the statement was NOT a racial statement and for a non-  
15 African American person to infer it was and put so much energy into  
16 it is beyond words. This is by far one of the worst accusations of  
17 racism on a person I have witnessed especially when it is not true.”

18 (b) **James R. Al-Kasseb (Deputy Sheriff, LA County Sheriff's**  
19 **Department):** “Not once did it seem to me DDA Sanna’s critique  
20 was directed at the minors as to their humanity, their race, or even  
21 their age. It appeared he was only addressing their actions. It makes  
22 perfect sense to me that negative behavior would be described  
23 negatively via simile. But, to imply that just because it is negative  
24 criticism, that it somehow automatically is referring to race, has  
25 more to do with the listener than the speaker.”

26 (c) **Michael N. Artis (Judicial Assistant, Antelope Valley**  
27 **Courthouse):** “My interpretation was that he was referring to the  
28 allegation that several minors attacked another minor at once, much





1           108. The following week, on January 31, 2023, Diaz-Herrera compelled Sanna to sit for yet  
2 *another* administrative interrogation. At the conclusion of the third interrogation, Diaz-Herrera suggested  
3 that she might need to interrogate Sanna a *fourth* time, which ultimately did not come to pass.

4           109. On February 22, 2023, at 11:45 a.m., Sanna received an email stating that his attendance  
5 was required to meet with Gascón’s Chief of Staff Joseph Iniguez that day at 2:00 p.m., at the Hall of  
6 Justice in downtown Los Angeles. Iniguez, like Woo, answers directly to Gascón in the LADA hierarchy.

7           110. Sanna works approximately 70 miles from downtown Los Angeles at the Antelope Valley  
8 office, about a two to three-hour drive away. Despite driving through rain and snow, Sanna arrived in the  
9 Hall of Justice lobby prior to 2:00 p.m. as requested. Iniguez kept him waiting for 25 minutes.

10           111. When Sanna finally met with Iniguez, he was informed that he was being suspended for  
11 five days without pay for misgendering Tubbs. Iniguez refused to provide specific details on Sanna’s  
12 suspension, and even acknowledged that Sanna’s performance reviews were very good and that he had  
13 no prior discipline. Iniguez also condescendingly admonished Sanna for engaging in abhorrent behavior  
14 that reflected poorly on the office.<sup>7</sup> Before leaving, Sanna signed an acknowledgment form and was given  
15 a suspension packet.

16           112. As Sanna was leaving, Iniguez told him that his chain of command—i.e., DIC Holmes—  
17 had already been notified of his suspension. But something changed in Iniguez’s demeanor as he said this  
18 that made Sanna suspicious.

19           113. After the meeting, Sanna called DIC Holmes to discuss how his suspension would be  
20 handled. Contrary to what Iniguez had just said, Holmes had no idea that Sanna was going to be  
21 suspended. Holmes also expressed to Sanna that the entire process had not been conducted in the typical  
22 manner: Holmes had neither been consulted nor included in the meeting to determine the proper  
23 discipline, and the suspension had been handed down suspiciously fast. Customarily, given the allegations  
24

25 \_\_\_\_\_  
26 <sup>7</sup> In June 2024, video was released of Iniguez being arrested in Azusa for public intoxication, along  
27 with his fiancé who was arrested for suspicion of driving while intoxicated. During the arrest, Iniguez  
28 told police that they had “pulled over the wrong person,” and the Azusa Police Department later  
commented that Iniguez had “treated [the officers] with disrespect.” Josh DuBose, “Top aide to DA  
Gascón tells police, ‘You’ve pulled over the wrong person,’” KTLA5 News (Jun. 25, 2024)  
<https://ktla.com/news/top-aide-to-da-gascon-tells-police-youve-pulled-over-the-wrong-person/>.

1 against Sanna, Holmes explained that he would have expected Sanna to have been issued multiple  
2 warnings before being handed a five-day suspension.

3 114. On March 16, 2023, Sanna filed a Level 3 Grievance regarding his suspension. Under  
4 LADA policy, a Level 3 Grievance is the final stage of appeal for internal grievances. A deputy district  
5 attorney may file a Level 3 Grievance only after the denial of his Level 1 Grievance, which is reviewed  
6 by his direct supervisor, and his Level 2 Grievance, which is an appeal reviewed by the supervisor of his  
7 direct supervisor.

8 115. A month later, on April 19, 2023, a meeting was held on Sanna’s Level 3 Grievance that  
9 included Iniguez, Senior Deputy County Counsel Kent Sommer, Sanna, and Sanna’s union  
10 representative, Richard Shinee. Iniguez made clear at the outset that no one could record the meeting and  
11 that he would not be making any statements.

12 116. On May 2, 2023, Sanna received an email denying his Level 3 Grievance in writing.

13 ***Gascón Publicly Reveals His Animosity for Sanna***

14 117. Also on May 2, 2023, Gascón gave an interview to the L.A. Progressive entitled “George  
15 Gascón Delivers Despite Strong Headwinds,” which was posted on YouTube.<sup>8</sup>

16 118. In the interview, Gascón is asked about his strategy to “sideline those people” who  
17 disagree with his ideological vision for the department. Rather than shy away from a question that  
18 effectively asked whether his office had ever violated the law by creating a hostile work environment and  
19 retaliating against public employees based on their viewpoint, Gascón leans in and admits to having  
20 engaged in such behavior. “Unlike [the D.A. of Philadelphia] Larry Krasner,” who “in one weekend fired  
21 half of his management staff, you don’t get to do that here,” Gascón bemoans. “So, we took the people  
22 we had and moved them around.”

23 119. Gascón then goes on to explain how he recently lost a \$1.5 million employment lawsuit  
24 because he reassigned an employee to a different position based on her viewpoint. Rather than  
25 acknowledge a lesson learned on employment law and policy, Gascón doubles down, arguing that the  
26 judge was wrong to instruct the jury that the employee’s reasonable viewpoint was protected regardless

27 <sup>8</sup> LA Progressive, *Los Angeles County District Attorney George Gascón chats with LA Progressive*  
28 *publishers*, YouTube (May 2, 2023),  
<https://youtu.be/xNnK51KJKd8?si=3xBnv95nn6ydLNLR&t=874>.

1 of whether Gascón or the LADA office agreed with it, or whether the policy the employee criticized was  
2 publicly known. Frustrated that he cannot fire or reassign employees based on their viewpoint, Gascón  
3 concludes the anecdote by resigning to the fact that “this is the world that I live in.”

4 120. Twice in that same interview, Gascón made thinly veiled attacks against Sanna within his  
5 discussion of prosecutors he’s struggling to “sideline.”

6 121. First, Gascón recounts the Tubbs case completely inaccurately, presenting Tubbs’s gender  
7 transition as fully genuine and Sanna as a transphobic bigot for intentionally misgendering Tubbs (again,  
8 it was DIC Holmes, not Sanna, who referred to Tubbs using male pronouns). As previously stated, Gascón  
9 himself has publicly questioned the sincerity of Tubbs’s gender transition and acknowledged that Tubbs  
10 attempted to “game the system.”

11 122. Later in the interview, Gascón recounts the incident when Sanna described the behavior  
12 of assailants that surrounded their victim as similar to hyenas’ hunting, and unreservedly casts Sanna’s  
13 remark as racist. He then casually mentions that Sanna “says that [black kids] are raping each other,”  
14 without providing any additional context. Here, Gascón is referring to the Matthew A. case, where, as  
15 mentioned above, one of the juvenile brothers had *admitted* to raping the other, and evidence suggested  
16 that they both had sexually assaulted their younger brother with autism. Furthermore, the brothers in  
17 Matthew A. were Hispanic, not black.

18 123. As this interview makes clear, Gascón was desperately searching for any justification he  
19 could find to make an example out of Sanna and retaliate against him. Gascón later admits that he has  
20 been trying to discipline Sanna for a year and a half, but he “still hasn’t gotten to a ‘place.’ ”

21 124. What “place” Gascón is attempting to reach is unclear, but apparently it was not reached  
22 by disciplining Sanna with two separate suspensions without pay and demoting him, as described below.

23 ***Gascón’s Retaliatory Harassment of Sanna Continues***

24 125. On June 4, 2023, Sanna gave an interview to Trey Gowdy, on his show “Sunday Night in  
25 America,” that was critical of Gasón’s policies. The following day, the interview was posted on Twitter.

26 126. Lo and behold, on June 6, 2023—two days after Sanna publicly criticized Gascón’s  
27 recently enacted policy and violations of existing policy—Iniguez again ordered Sanna to appear  
28 downtown and meet with him at the Hall of Justice at 3:00 p.m.

1           127. Sanna had intended to take this day off because he needed to drive a friend to  
2 chemotherapy, but he had come to work nonetheless at the request of DIC Holmes because the office was  
3 short-staffed. While in court, Holmes brought Sanna a printed copy of Iniguez’s email demanding that he  
4 appear downtown. So, Sanna dropped his duties and started the drive.

5           128. Sanna had no idea why he had been called downtown to meet with Iniguez, and Iniguez’s  
6 office refused to provide additional information. Based on his previous experience, Sanna understood that  
7 Iniguez conducts such hearings in an intentionally abusive and malicious manner.

8           129. Despite his best efforts, Sanna could not arrive downtown by 3:00 p.m. Thus, he was  
9 ordered to make the 70-mile trip the following morning.

10           130. When he arrived downtown on June 7, 2023, Iniguez made Sanna wait as he had done  
11 before. But unlike the first time Sanna met with Iniguez, a LADA investigator had been summoned to  
12 shadow him from the time he arrived until the time he left the building. Plainly, the use of the LADA  
13 investigator was intended to intimidate Sanna.

14           131. Once Sanna finally met with Iniguez, he was presented with a packet explaining he was  
15 being suspended for 10 days without pay based on his innocuous “hyena” remark.

16           132. During the meeting, Iniguez’s tone was patronizing. When Sanna asked for his Skelly  
17 packet, Iniguez condescendingly said that he had provided Sanna with all that he was ethically obligated  
18 to.

19           133. As with the time before, Iniguez did not notify Sanna’s supervisor that he was being  
20 suspended, let alone discuss the matter with him before handing the suspension down. The Gascón  
21 administration created a hostile work environment for Sanna and did everything in their power to make  
22 his work life abusive, hostile, and stressful.

23           134. On June 8, 2023, DIC Holmes informed Sanna that he was no longer allowed to appear  
24 on cases involving Deputy Public Defender Murayama, whom Sanna knew had complained to Gascón  
25 about the innocuous “hyena” comment and Sanna’s accurate representation that a juvenile defendant had  
26 sexually assaulted one of his siblings.

27  
28

1           135. Effectively, Gascón was accommodating the Public Defender office’s request on which  
2 prosecutors opposed its attorneys, a strange concession given the adversarial nature of the American legal  
3 system.

4           136. On June 27, 2023, Sanna learned that a new CEOP complaint had been filed against him  
5 (Complaint No. 2023-120221). Again, Sanna was not provided with additional details regarding the  
6 charges, other than “[t]he complaint generally alleges inappropriate conduct towards others and  
7 discrimination.” On October 17, 2023, following an investigation, CEOP concluded that the allegations  
8 were unsubstantiated, and the matter was dismissed.

9           137. On June 30, 2023, a management-level LADA prosecutor with direct supervisory  
10 authority over Sanna called Sanna into his office, told him to close the door, and warned him: “This  
11 should come as no surprise. They [the Gascón administration] are still coming after you. Be careful. Just  
12 use your good judgment. This conversation never happened.” When Sanna followed up and asked for  
13 specifics, the supervisor paused for a moment, glanced at Sanna, and told him, “Just be careful and use  
14 good judgment.”

15           138. On or around July 6, 2023, DIC Holmes informed Sanna that the clerk’s office could not  
16 find the Tubbs file. Holmes then confirmed with the clerk and the court that there had not been a transfer  
17 motion filed, meaning there was no motion to transfer Tubbs from juvenile to adult court. Because the  
18 Tubbs case was no longer active, there was no reason for a prosecutor to pull the file. And even if they  
19 had, they would have been required to obtain permission of the presiding judge of juvenile court to inspect  
20 the court file.

21           139. To Sanna’s knowledge, the Tubbs file still has not been located.

22           140. On July 19, 2023, Sanna was informed that LADA investigators with the Internal Affairs  
23 division had contacted Judge Barrera’s Judicial Assistant and wanted to interview her about Sanna’s  
24 conduct in the courtroom. The Judicial Assistant did not feel comfortable being interviewed, so she had  
25 county counsel assist her.

26           ***The Hostile Work Environment Created by Gascón Hampers Sanna’s Ability to Perform His Job***

27           141. On July 31, 2023, Sanna was working on the Tristan L. case, which involved a horrendous  
28 allegation of child sexual assault. After reviewing the case file, Sanna concluded that the defendant might



1 be the most dangerous person he had ever come across, and that a transfer to the adult court system was  
2 appropriate.

3 142. Yet because of the hostile work environment created by Gascón, both DIC Holmes and  
4 another colleague suggested putting a different prosecutor's name on the memo. They explained to Sanna  
5 that the case was too important for the motion to be rejected because it came from him. Sanna agreed and  
6 allowed another prosecutor to sign the motion.

7 143. As this incident demonstrates, the hostile work environment created by Gascón was so  
8 pervasive that it prevented Sanna from effectively performing his prosecutorial duties, a reality  
9 recognized by all who worked with him.

10 144. On August 7, 2023, a supervisor called Sanna into his office to give him some advice  
11 before Sanna's upcoming Skelly Hearing. "The same people who filed the complaint against you are the  
12 same people conducting your hearing," the supervisor told him. In other words, the supervisor conveyed  
13 to Sanna that his chances of obtaining a fair result at his Skelly Hearing were dismal.

14 ***A Harmless Miscommunication Sparks Another Frivolous Investigation of Sanna***

15 145. Later in August 2023, Sanna was taking a planned vacation when a colleague informed  
16 him that Deputy Public Defender Alex McConnell had slandered him in an email to Chief Deputy Sharon  
17 Woo, Gascón's second-in-command.

18 146. McConnell had alleged that Sanna intentionally withheld a memo from Woo directing  
19 him to withdraw a transfer motion in the Quiroz case.

20 147. For context, on January 11, 2023, DDA Flora Podratz and Head Deputy Yeal Massry,  
21 without Sanna's input, got permission to file a temporary transfer motion to send Quiroz back to adult  
22 court.

23 148. In February 2023, Sanna was assigned to the case, but DIC Andre Holmes and DDA Flora  
24 Podratz retained the file, drafting all internal memos and emails. From February to August 2023, Sanna  
25 never worked on or appeared in the case.

26 149. On July 24, 2023, Sanna requested and received approval for vacation from August 14-  
27 16, 2023.

28

1           150. On July 28, 2023, Woo sent an email with a memo stating that any previously filed  
2 motions to transfer in Quiroz were to be withdrawn at the next court date, August 14, 2023. This email  
3 was forwarded to all relevant personnel, including DDA Dru Hodge.

4           151. The Quiroz hearing at issue occurred on August 14, 2023, after Sanna had already left for  
5 vacation. Sanna's colleague, Dru Hodge, handled the case in Sanna's absence.

6           152. Before he left, Sanna attached Woo's memo to the front of the case file with a paper-clip.

7           153. Upon information and belief, Hodge simply did not see Woo's memo until the hearing  
8 had already begun. Once Hodge noticed the memo during the hearing, he immediately turned it over to  
9 defense counsel and the court, and read it into the record.

10          154. In short, it was a minor miscommunication that was remedied before it was too late.

11          155. Unsurprisingly, considering the Gascón administration's vendetta against Sanna, the  
12 LADA office investigated the matter intently, attempting to flip this small miscommunication into an  
13 instance of insubordination.

14          156. Despite being on vacation on the date of the hearing, Sanna was required to answer a  
15 series of accusatory questions from supervisors and meet with DIC Holmes multiple times to discuss the  
16 issue.

17          157. The Gascón administration has launched an Internal Affairs investigation into the baseless  
18 allegation that Sanna intentionally withheld Woo's memo from Hodges, notwithstanding the fact that  
19 Sanna paperclipped it to the front of the case file. As part of this investigation, the Director of LADA's  
20 Bureau of Investigations personally interviewed Sanna about the incident in June 2024.

21           ***Sanna's Report About LADA's Suppression of Evidence in the Larry H. Case Goes Unaddressed***

22          158. In or around May 2023, the Los Angeles County Board of Supervisors instructed members  
23 of LADA and the L.A. County Public Defender's Office to meet and choose defendants to release from  
24 juvenile custody. One of the selected defendants was Larry H., a repeat carjacking offender who, in his  
25 most recent case, had run the victim over with the victim's own car.

26          159. Weeks before the powers that be selected Larry H. as a candidate for release, Sanna had  
27 represented the People at Larry H.'s arraignment and argued before the court that he should remain in  
28 custody based on his repeat offenses.



1 167. Although Gascón took no action in response to Sanna’s report, on April 24, 2024, the  
2 California Attorney General charged Teran with 11 felony violations for repeated and unauthorized use  
3 of data from confidential, statutorily protected peace officer files.<sup>9</sup>

4 ***Gascón Retaliates Against Sanna by Demoting Him***

5 168. On October 2, 2023, Gascón’s administration demoted Sanna by transferring him to the  
6 Santa Clarita Office. Gascón did so notwithstanding the fact that Sanna was in the middle of a home  
7 invasion murder trial at the time.

8 169. Sanna, who previously worked at the Santa Clarita office for two years, did not include  
9 Santa Clarita on the list of courthouses that he was willing to be transferred to.

10 170. Further, the courthouse that Sanna previously worked at was so understaffed that the Head  
11 Deputy was handling cases on a daily basis.

12 171. Sanna’s demotion also included a pay cut and ensured that he would handle less  
13 meaningful cases than he previously did. In Antelope Valley, Sanna regularly handled felony cases,  
14 including those involving charges of murder and sexual assault; but in Santa Clarita, he would only be  
15 assigned misdemeanor cases, such as driving under the influence or driving on a suspended license.

16 172. With this demotion, Gascón implemented his professed strategy of “sidelining” those  
17 employees who disagreed with his ideology by demoting them. Gascón’s interview with the L.A.  
18 Progressive makes clear that, even after losing employment claims based on lesser behavior, Gascón has  
19 learned nothing and still believes that he can demote employees for raising concerns about his  
20 administration’s deviation from long-standing practices and violations of legal and ethical obligations.

21 ***Gascón is Compelled to Reduce Sanna’s Second Suspension Based on Witness Statement, Yet Fails***  
22 ***to Reverse the Suspension as the Evidence Demanded***

23 173. On November 28, 2023, LADA reduced Sanna’s second suspension for the Hyena remark  
24 from 10 days to 5 days, based largely on the overwhelming support that he received from witnesses  
25 present when he made the remark.

26 \_\_\_\_\_  
27 <sup>9</sup> See State of California Department of Justice, Office of the Attorney General, *Press Release:*  
28 *Attorney General Bonta Files Felony Charges Against the Los Angeles Ethics and Integrity Assistant*  
*District Attorney* (Apr. 24, 2024) <https://oag.ca.gov/news/press-releases/attorney-general-bonta-files-felony-charges-against-los-angeles-ethics-and>.

1 174. Although these witnesses’ statements clearly supported the conclusion that Sanna did not  
2 make the remark with racist intent, and there was no independent evidence to the contrary, Gascón upheld  
3 Sanna’s suspension, refusing to relinquish an opportunity to retaliate against Sanna and falsely malign  
4 him as a racist.

5 ***Gascón Retaliates Against Sanna by Refusing to Promote Him***

6 175. On September 7, 2023—notwithstanding that Sanna has received only “exceeds  
7 expectations” evaluations by his supervisors and scored a perfect 100/100 score on the exam used by  
8 LADA to determine whether to promote prosecutors—Gascón passed over Sanna for promotion, and  
9 instead promoted numerous other Grade 2 DDA’s to the rank of Grade 3, some with worse performance  
10 evaluations and lower test scores than Sanna.

11 176. Indeed, only one other individual from Sanna’s hiring class has not been promoted to the  
12 rank of “Grade 3” by LADA. The other individual is also a critic of the Gascón administration.

13 177. On April 17, 2024, Gascón once again passed over Sanna for promotion, and instead  
14 promoted 30 other Grade 2 DDA’s to the rank of Grade 3, most with less seniority and experience than  
15 Sanna.

16 178. Gascón’s refusal to promote Sanna has severely impaired his ability to achieve promotion  
17 in the future, setting back the progress that he had made towards that goal by roughly two years.

18 ***The Ongoing Toll of Gascón’s Retaliation***

19 179. Sanna is far from the only casualty of Gascón’s vindictive regime.

20 180. Gascón also retaliated against Shawn Randolph, the former Head Deputy of the Juvenile  
21 Division, for disagreeing with his ideology.

22 181. In March 2023, Randolph won her retaliation suit against Gascón and the County, with  
23 the jury awarding her \$1.5 million in damages.

24 182. Gascón also asked Randolph’s replacement, Phil Glaviano, to perform unlawful acts,  
25 including retaliating against Sanna.

26 183. When Glaviano refused, Gascón similarly transferred him to another department in an act  
27 of retaliation.

28 184. In October 2023, Glaviano filed an employment lawsuit against Gascón and the County.

1           185. In addition, DIC Andre Holmes, who consistently attempted to look out for Sanna while  
2 following the orders of his supervisors, was transferred and demoted on the same day as Sanna.

3           186. The Gascón administration’s relentless retaliation campaign against Sanna continues to  
4 this day.

5           187. On October 20, 2023, CEOP sent Sanna a letter informing him that a **fourth complaint**  
6 had been filed against him—this time alleging “inappropriate conduct towards others and third-person  
7 harassment”—but had been dismissed because CEOP did not have jurisdiction over the complaint. The  
8 letter does not provide any additional context, leaving open the possibility that another entity with  
9 jurisdiction could adjudicate the matter, and failing to identify which incident gave rise to the complaint.

10           188. CEOP’s October 2023 letter served to intimidate and harass Sanna by reminding him that  
11 the Gascón administration still was surveilling him closely, ready to capitalize on any minor misstep to  
12 complete its mission of sidelining Sanna, and also, that it reserved the right to pursue the same charges  
13 against Sanna in an alternative forum.

14           189. On October 25, 2023, Sanna’s union representative sent him a text message with a clear  
15 warning: “THEY [the Gascón administration] ARE SETTING YOU UP FOR DISCHARGE.”

16           190. As of the filing of this complaint, Sanna anticipates that Gascón will terminate him any  
17 day. This uncertainty has caused Sanna to suffer extreme levels of stress and anxiety while still attempting  
18 to perform his job to the best of his ability and take care of his family.

19           191. Before publicly disagreeing with Gascón, Sanna enjoyed an excellent employee file with  
20 performance evaluations that exceeded expectations. He had no history of discipline whatsoever.

21           192. But since attracting Gascón’s ire, Sanna’s employee file has been unjustly tarnished by a  
22 disciplinary record based on false allegations and frivolous complaints.

23           193. Sanna’s demotion to the Santa Clarita office has taken a particular toll on his mental and  
24 physical well-being. Not only is the demotion a step backward in his career, but the Santa Clarita office  
25 is understaffed, resulting in Sanna’s workload effectively doubling.

26           194. Sanna has been overwhelmed by this increased workload and the constant stress from  
27 Gascón’s ongoing persecution, making him susceptible to multiple bouts of serious illnesses contracted  
28 in recent months.



1 misgendered Tubbs, used the term “hyenas” to describe the behavior of a group of defendants with racist  
2 intent, accurately described minor defendants as having raped each other, and intentionally withheld a  
3 memo instructing that a motion to transfer a case to adult court be withdrawn when he had conspicuously  
4 paperclipped it to the front of the case folder—to serve as a pretext to take adverse employment actions  
5 against him.

6 201. As a result of these baseless investigations, LADA took a series of adverse employment  
7 actions against Sanna:

- 8 (a) On February 22, 2023, LADA suspended Sanna for 5 days without pay  
9 based on the false claim that he had misgendered Tubbs;
- 10 (b) On June 7, 2023, LADA suspended Sanna for 10 days without pay for  
11 his innocuous “hyena” comment. On November 28, 2023, LADA  
12 reduced this second suspension from 10 days to 5 days, based largely on  
13 the overwhelming support that he received from witnesses present at the  
14 time he made the statement. Yet, notwithstanding this overwhelming  
15 evidence, LADA still upheld Sanna’s suspension.
- 16 (c) On October 2, 2023, LADA demoted Sanna and transferred him to the  
17 Santa Clarita office, which resulted in a pay cut and the handling of less  
18 meaningful cases.
- 19 (d) On April 17, 2024, LADA refused to promote Sanna to Grade III along  
20 with 94% of his hiring class, despite the fact that Sanna had received  
21 only “exceeds expectations” evaluations by his supervisors and scored a  
22 perfect 100/100 score on the exam used by LADA to determine whether  
23 to promote prosecutors.

24 202. Sanna’s protected disclosures of the violations of law mentioned above were a substantial  
25 motivating factor in LADA’s decision to take adverse employment actions against him.

26 203. Indeed, during his interview with the L.A. Progressive on May 2, 2023, Gascón admitted  
27 that he was taking adverse employment actions against Sanna—whether he understood them to be or  
28



1 not—because Sanna had publicly disclosed violations of law and ethical guidelines by Gascón and his  
2 administration.

3 204. As a result of LADA’s adverse employment actions against Sanna, Sanna has lost and  
4 will continue to lose income, wages, earnings, earning capacity, overtime, pension, benefits, and other  
5 economic loss, causing Sanna to sustain damages in an amount to be ascertained according to proof.

6 205. As a further result of LADA’s adverse employment actions against Sanna, Sanna has  
7 suffered and will continue to suffer physical, mental, and emotional injuries, pain, distress, suffering,  
8 grief, anxiety, humiliation, injured feelings, as well as other unpleasant physical, mental, and emotional  
9 reactions, damages to reputation, and other non-economic damages, in a sum to be ascertained according  
10 to proof. Said damages are of the type that any person would suffer as result of the illegal and wrongful  
11 conduct of Defendants.

12 206. As a further legal result of LADA’s adverse employment actions against Sanna, Sanna  
13 was required, and in the future may be required, to engage the services of health care providers, and  
14 incurred expenses for health care, services, supplies, medicines, health care appliances, modalities, and  
15 other related expenses in a sum to be ascertained according to proof.

16 207. As a further legal result of LADA’s adverse employment actions against Sanna, Sanna  
17 suffered other incidental and consequential damages, in an amount according to proof.

18 208. As a further legal result of LADA’s adverse employment actions against Sanna, Sanna is  
19 entitled to attorneys’ fees and costs of suit in an amount according to proof pursuant to Labor Code section  
20 1102.5, C.C.P. 1021.5, and other authorities.

21 209. As a further legal result of LADA’s adverse employment actions against Sanna, Sanna is  
22 entitled to prejudgment interest pursuant to California Civil Code section 3287 and any other provision  
23 of law providing for prejudgment interest.

24 **SECOND CAUSE OF ACTION**

25 **Intentional Infliction of Emotional Distress**

26 **(Against All Defendants)**

27 210. Sanna incorporates every allegation contained in the preceding paragraphs, as though  
28 set forth fully herein.



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- 4. For punitive damages against Defendant Gascón, in an amount to be determined by the Court according to proof;
- 5. For an award of attorneys' fees and costs incurred herein;
- 6. For an award of post-judgment interest for the maximum amount allowed by law; and
- 7. For any and all other relief the Court deems just and proper.

Dated: August 12, 2024

Respectfully submitted,

**DHILLON LAW GROUP INC.**

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**REQUEST FOR JURY TRIAL**

Plaintiff Shea Sanna hereby demands a trial by jury on all claims and issues so triable.

Dated: August 12, 2024

Respectfully submitted,

**DHILLON LAW GROUP INC.**

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