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8 Attorneys for Claimant
9 SABRINA LANDRETH

10 COUNTY OF ALAMEDA, STATE OF CALIFORNIA

11 SABRINA LANDRETH,) Claim No.
12 Claimant,) CLAIM PURSUANT TO CALIFORNIA
13 v.) GOVERNMENT CLAIMS ACT
14 EAST BAY REGIONAL PARK DISTRICT)
15 Respondent.)
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1 From 2021 through 2024, Claimant’s performance reviews at the District were stellar. In
2 2024, the District extended Claimant’s contract for five years.

3 As General Manager, Claimant had a legal duty to respond to complaints of
4 discrimination and harassment. In December 2024 and January 2025, Claimant received
5 complaints from female staff alleging that Directors Colin Coffey and Dennis Waespi had
6 harassed and bullied them in communications, both verbally and in writing, and indicating that
7 Directors Coffey and Waespi treated male employees more favorably. After reviewing
8 supporting documentation and other evidence, Claimant determined that workplace training on
9 anti-harassment, micro-aggression, and anti-bullying was warranted as a corrective and
10 preventative measure.
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13 In meetings, emails, phone calls, and at a January 2025 Board retreat, Claimant informed
14 the Board about the complaints and need for training. Shortly thereafter, Claimant engaged an
15 outside attorney to conduct the training, which took place in March 2025. From that point
16 forward Directors Coffey and Waespi—as well as other Board members they recruited to do the
17 same, such as then Board President John Mercurio, and Directors Sanwong and Deschambault—
18 began a course of retaliatory conduct against Claimant in a number of ways including but not
19 limited to:
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- 21 1. Refusing to communicate with Claimant directly;
- 22 2. Refusing one-on-one meetings with Claimant;
- 23 3. Ignoring Claimant’s emails;
- 24 4. Removing Claimant from internal staff emails;
- 25 5. Making false allegations about Claimant’s performance to others including that she
26 was not providing information though she had done so and in writing;
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- 1 6. Failing to attend site visits, briefings or programs Claimant arranged for the Board;
- 2 7. Treating Claimant with open hostility in public and closed sessions, including calling
- 3 her “a liar”; and
- 4 8. Openly laughing as Claimant spoke.

5
6 The retaliatory conduct also included subjecting Claimant to a pretextual performance
7 review process designed to manufacture false allegations of bad performance, to undermine her
8 accomplishments at the District and her professional experience otherwise. Claimant repeatedly
9 voiced concerns to the Board and Human Resources about the biased nature of the performance
10 evaluation process but received no remedy.
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12 The course of retaliatory conduct was also as a result of Claimant’s refusal to engage in
13 unlawful conduct despite pressure from Board members, including but not limited to:

- 14 1. Awarding large lobbyist contracts to consultants of a Board member’s choosing
- 15 outside of the required legal process;
- 16 2. Directing police staff regarding speed enforcement;
- 17 3. Directly appointing a Clerk of the Board of Board members’ choosing in violation
- 18 of District policy;
- 19 4. Promoting employees in violation of District policy;
- 20 5. Conducting closed sessions regarding land acquisition in violation of the Brown
- 21 Act;
- 22 6. Continuing the practice of misusing public taxpayer dollars, including the
- 23 purchase of alcohol for District events;
- 24 7. Engaging in nepotism for family members with priority placements in East Bay
- 25 Regional Park District’s programs such as the on-call firefighter program;
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- 1 8. Providing gifts to public officials such as helicopter ride-alongs; and
- 2 9. Redirecting public resources for political purposes in the Tri-Valley to support a
- 3 Board member's reelection campaign;
- 4 10. Director Coffey admitting to Claimant that he was conducting himself in a
- 5 "highly sophisticated" campaign to "take advantage of Director Sanwong's
- 6 mental health issues" to advance his personal agenda; and
- 7
- 8 11. Defaming Claimant by making false allegations about her and/or her work
- 9 performance.

10 The course of retaliatory conduct was intentionally designed to create working conditions
11 that were so intolerable that a reasonable person in Claimant's position had no reasonable
12 alternative except to resign.
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14 During her time at the District, Claimant was also subject to gender-based discrimination
15 and harassment, including but not limited to:

- 16 1. The District paying Claimant less than her male predecessor;
- 17
- 18 2. Director Waespi telling Claimant he had to "go check with the boys" in response to
19 Claimant;
- 20 3. Director Waespi praising "macho men" at the District and telling Claimant "the boys"
21 would have done the right thing;
- 22 4. Director Waespi telling Claimant "Only women should be gardeners";
- 23
- 24 5. Director Waespi raising his voice at Claimant and physically getting in her personal
25 space while puffing his chest when she refused to award lobbying contracts to his
26 desired consultant;
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- 1 6. Director Coffey accusing Director Elizabeth Echols of not being an effective Board
- 2 member since “she's a single mom”;
- 3 7. Board members undermining Claimant by continually referring to her as the “new
- 4 GM” after almost five years of her employment;
- 5 8. False allegations in the performance evaluation process which included gender-based
- 6 stereotypes that Claimant was emotional and overreactive under pressure with no
- 7 examples;
- 8 9. Silencing Claimant by accusing her of “dominating the conversation” when Claimant
- 9 voiced concerns about the evaluation process;
- 10 10. Directors Coffey and Waespi telling Claimant that she was not being “aggressive”
- 11 enough or “crushing” like her male predecessor; and
- 12 11. Then Board President Mercurio asking Claimant to “slow down this work in DEI.”
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16 As a result of Claimant’s efforts to carry out her lawful responsibilities under laws and
17 policies applicable to the District, she was:

- 18 1. subjected to a course or pattern of conduct that, taken as a whole, materially and
- 19 adversely affected the terms, conditions, or privileges of her employment;
- 20 2. subjected to false and defamatory accusations regarding her alleged poor work
- 21 performance and her professional reputation in general;
- 22 3. constructively terminated from her position as General Manager of the District.
- 23
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25 This claim seeks recovery on the basis of all applicable legal theories, including but not
26 limited to violations of state and federal statutes and the United States and California
27 constitutions. The names of the public employees and officials causing Claimant’s injuries
28 include, but are not limited to, Directors Coffey, Waespi, Mercurio, Sanwong and Deschambault.

1 As a result of the actions of the public employees and officials named above, and others,
2 Claimant has been damaged by suffering the loss of income, including retirement and medical
3 benefits; harm to her reputation; emotional distress; and violations of her rights to equal
4 protection of the laws. She has and will incur medical, legal and incidental expenses. The
5 damages sought by this claim are within the unlimited jurisdiction of the Superior Court of
6 California.
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8 All notices or other communications with regard to this claim should be sent to P. Bobby
9 Shukla, Attorney for Claimant, at Shukla Law, P.C., 505 Montgomery Street, Suite 1100, San
10 Francisco, CA 94111, (415) 847-3983, bshukla@shuklalawfirm.com.
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12 Dated: February 11, 2026

SHUKLA LAW, P. C.



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