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Lazarski Law Practice, P.C.

March 30, 2026

**VIA OVERNIGHT DELIVERY**

Humboldt County Clerk of the Board,  
Courthouse, 825 5th Street, Room 111,  
Eureka, California 95501-1153

Re: Notice of Claims re Dianna Rios v. County of Humboldt

This Notice of Claims is made pursuant to California Government Code Section 910, *et seq.*, by Claimant Dianna Rios (“Ms. Rios”) against the County of Humboldt, California (“Humboldt County” or “the County”). Pursuant to Government Code § 910(f), the amounts sought by Ms. Rios exceed ten thousand dollars (\$10,000), in an amount according to proof at trial.

Please take notice that Ms. Rios intends to seek damages against the County and, to the extent applicable, its Supervisors or employees, pursuant to California Labor Code section 1102.5, and all other laws to the extent applicable. Ms. Rios’s claims are based on the following facts, without limitation, and she reserves all rights to supplement or amend this Notice with additional facts or claims as may be discovered or become relevant.

**RELEVANT FACTS**

Ms. Rios was employed by the County as its Economic Development Coordinator until she was terminated on October 1, 2025. Ms. Rios was terminated in clear retaliation for her reporting of sexual harassment, invasion of privacy, and related claims by then- [REDACTED] [REDACTED] in August 2024. [REDACTED] was a [REDACTED] to Ms. Rios during [REDACTED] employment at the County.

On or about December 2-4, 2023, Ms. Rios travelled with [REDACTED] and another County employee to attend the [REDACTED]. While there, [REDACTED] [REDACTED] [REDACTED] which caused Ms. Rios extreme embarrassment, humiliation, loss of reputation, and emotional distress.

On or about August 23, 2024, Ms. Rios reported [REDACTED] conduct to County Human Resources Director Zachary O’Hanen . The delay in her reporting was because she was fearful of retaliation from [REDACTED] [REDACTED] and [REDACTED] friends in the County, but her supervision was being transferred from [REDACTED] and she felt unsafe working under new supervision without the reporting the [REDACTED] incident. Mr. O’Hanen issued an “Administrative Investigation and



providing information to, or testifying before, any public body conducting an investigation, hearing, or inquiry, if the employee has reasonable cause to believe that the information discloses a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation, regardless of whether disclosing the information is part of the employee's job duties."

Cal. Labor Code sec. 1102.5(c) states, "An employer, or any person acting on behalf of the employer, shall not retaliate against an employee for refusing to participate in an activity that would result in a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation."

Ms. Rios intends to take legal action under these statutes and other applicable law (including but not limited to the Fair Employment and Housing Act, which claims need not be exhausted here).

Finally, it should be noted that under Labor Code sec. 1102.6, "In a civil action or administrative proceeding brought pursuant to Section 1102.5, once it has been demonstrated by a preponderance of the evidence that an activity proscribed by Section 1102.5 was a contributing factor in the alleged prohibited action against the employee, the employer shall have the burden of proof to demonstrate by clear and convincing evidence that the alleged action would have occurred for legitimate, independent reasons even if the employee had not engaged in activities protected by Section 1102.5." The County will have a difficult time meeting this burden of rebuttal where it cannot point to any legitimate performance-related reason for Ms. Rios's termination.

#### **Notice and Further Action**

If the County declines to act, or fails to act within forty-five (45) days of this Notice, Ms. Rios will proceed with the foregoing claims in Humboldt County Superior Court. Ms. Rios further contends that there exists no further internal or administrative remedy available to her that could provide due recourse. All notices on this matter should be directed to Counsel of Record:

Bryan J. Lazarski  
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All rights are reserved and no admissions are made by Ms. Rios in connection with this Notice.

Regards,



LAZARSKI LAW PRACTICE, P.C.