

Filomeo Investigative Services

P.O. Box 1
Eureka, CA 95502

Phone: (707) 445-1004
Fax: (707) 442-3536
Email: filomeoinvestigations@suddenlink.net

August 29, 2018

County of Humboldt
Human Resources Department
825 Fifth Street
Eureka, CA 95501

RE: Allegation of : Creating Hostile Work Environment
Client: County of Humboldt Human Resources / Auditor/Controller
Charging Party: [REDACTED]
Accused: Karen Paz Dominguez

**PREPARED IN ANTICIPATION OF LITIGATION
ATTORNEY WORK PRODUCT – PRIVILEGED INFORMATION**

FINAL INVESTIGATION REPORT

Assignment:

On March 21, 2018 we received an urgent investigation request in response to the reporting of a possible Hostile Work Environment. We were not provided with any information as to the accused, the charging parties or what specific acts and/or comments had allegedly created the environment. Rather, we were asked to go in “cold” and through our questioning of each staff member within the Auditor-Controller office determine if there was evidence of a hostile work environment and if so, whom and what was causing such.

Before we could begin our investigation we received a request to perform a second investigation regarding allegations filed by the Assistant Auditor-Controller, Karen Paz Dominquez against the Auditor-Controller, Joseph Mellett. We were requested to perform both investigations concurrently but with separate reports being issued for each.

Before completing our report on either investigation we were informed that on April 16, 2018 [REDACTED] had filed a formal complaint related to continuing and additional alleged hostile actions by Ms. Paz Dominguez. We were requested to address these new allegations and to



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obtain additional statements as we deemed necessary.

Charging Parties, Witnesses and Accused:

A list of all people interviewed and their connection to our investigation is below:

| Karen Paz Domiquez | Accused | Assistant Auditor-Controller |
|--------------------|----------------|------------------------------|
| | Charging Party | |
| | Charging Party | |
| | Charging Party | |
| | Witness | |

Recorded Statements:

All statements were taken in-person within the Humboldt County Risk Management conference room between March 26th and March 27th except Ms. Paz Dominguez whose statement was taken on March 29th and ██████████ whose statement was taken on April 11th. Regarding the filing of ██████████ formal complaint on April 16th, we took additional statements from ██████████ April 24th. Permission to record each statement was obtained by all parties in attendance.

Charging Party ██████████
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██████████
██████████

██████████ has been employed by the County of Humboldt for ██████████ and has been at her current position for ██████████. ██████████ has known Ms. Paz Dominguez since Ms. Paz Dominguez came to work for the County. They have no relationship outside of work. She stated her relationship with Ms. Paz Dominguez has become strained



almost to the point where they could not again be amicable but it hasn't reached that yet and she's still optimistic. ██████████ stated up until fairly recently Ms. Paz Dominguez was her immediate supervisor but Mr. Mellett relieved Ms. Paz Dominguez of that role and her direct supervisor is currently Mr. Mellett. She explained that Ms. Paz Dominguez caused several unwelcome and disruptive incidents in the ██████████ division which caused extreme work interruptions and stress upon the employees. ██████████ stated she provided the details of these incidents to Mr. Mellett and requested he remove her authority over ██████████ which he did approximately two weeks ago in mid-March.

██████████ is not a protected class under ADA. ██████████ ██████████ due to the stress they reported they were experiencing from Ms. Paz Dominguez actions and behavior. ██████████ stated she has one time previously been involved in a work place investigation and in that instance she was a witness in an investigation pertaining to the Ms. Paz Dominguez's predecessor. She has never filed a stress or anxiety claim with any prior employer. ██████████ has no recollection of being made aware of the County's anti-discrimination or anti-harassment policies.

██████████ stated approximately two weeks before Mr. Mellett took Ms. Paz Dominguez's authority over ██████████ away she and ██████████ had approached Mr. Mellett to report Ms. Paz Dominguez had created a hostile work environment for them and the other staff in the ██████████. Mr. Mellett directed them to Human Resources where they made the same claim. ██████████ was directed by HR at that time to start documenting the actions and comments of Ms. Paz Dominguez which she believed were part of the hostile work environment. She stated some examples of the harassment she received from Ms. Paz Dominguez include her being asked at random times what she is working on. On one such occasion she received two emails within 20 minutes of each other followed by Ms. Paz Dominguez physically coming over to ██████████ and in an aggressive tone of voice asking if she reads her emails and then demanding to know what she was working on at that moment. When ██████████ looked at the emails she saw that they were very short and just asked, "what are you working on today?". ██████████ stated she believes these actions and behavior are harassment as after she tells Ms. Paz Dominguez what she is working on, Ms. Paz Dominguez has nothing more to say to her. She stated Ms. Paz Dominguez doesn't communicate why she has an immediate need to know what she is working on nor does she tell her to continue working on what she is doing or to do something different as that hasn't seemed to matter as much as just making her stop what she is doing and answer to her. ██████████ stated this type of behavior by Ms. Paz Dominguez is "very upsetting" to her as Ms. Paz Dominguez does not give her specific directions on what she wants done, she does she ask her if she is going to meet any deadline and she does not ask her to prioritize her work so her insisting on knowing what she's doing at any given moment comes across as Ms. Paz Dominguez just trying to assert her authority for no reason. She added when you also take into account Ms. Paz Dominguez aggressive manner when doing this, it feels like she is being "attacked". She stated when this behavior by Ms. Paz Dominguez was occurring the most, Ms. Paz Dominguez had within an approximate ten day period made her stop what she was doing on four occasions just to come to



Ms. Paz Dominguez’s office and answer the question of what she was working on. ██████████ stated within the last 1½ months Ms. Paz Dominguez’s harassment has escalated in that Ms. Paz Dominguez has become more aggressive in her tone and mannerisms when they encounter one another. ██████████ dispelled the possibility she had been too sensitive and was overreacting to Ms. Paz Dominguez when she stated Ms. Paz Dominguez’s predecessor had once been agitated and was too aggressive towards her but after they discussed his actions he acknowledged he’d acted inappropriately and it never happened again. In contrast, every time she’s tried to have a similar discussion with Ms. Paz Dominguez, Ms. Paz Dominguez goes into denial and rejects any suggestion that she had been acting aggressively or inappropriately.

██████████ believes Ms. Paz Dominguez’s subordinates in the ██████████ ██████████ have been treated differently by Ms. Paz Dominguez than her subordinates in the other divisions. She does not believe this different treatment has been due to their age, race, color, gender, national origin, religion or sexual preference/identification. ██████████ stated no other supervisor or employee has treated her subordinates in the same or similar manner Ms. Paz Dominguez has.

██████████ stated part of her difficulty in interacting with Ms. Paz Dominguez has been Ms. Paz Dominguez’s behavior being extremely inconsistent. She stated Ms. Paz Dominguez will go from being “the nice guy” one moment to going off on a rant where she wants everyone’s immediate attention in order to implement new rules that very moment and demands immediate compliance. ██████████ stated she at first attributed this behavior of Ms. Dominguez to “getting use to the office and her role” and wanting to make changes, some of which were for the better. However, over time Ms. Paz Dominguez developed a pattern of going back and forth on the changes she implemented and denying that she’d given directives which had been witnessed by the staff. She stated it became apparent early on that Ms. Paz Dominguez had no or very little experience in ██████████ matters or personnel management and some of the policies and procedures she wanted implemented were not going to work for various reasons. ██████████ stated when Ms. Paz Dominguez directed these poorly thought out changes to be made, she would discuss with Ms. Paz Dominguez why her changes may not be a good idea and why they were doing things the way they were. After this occurred on a few occasions Ms. Paz Dominguez would only come over to ██████████ and try to implement changes when she wasn’t present such as when she was at a meeting or absent for a few hours for other reasons. ██████████ stated on several occasions she would we return from her absence and be told Ms. Paz Dominguez had come over and insisted on talking to the staff and telling them ██████████ was not needed. When she would then talk to Ms. Paz Dominguez to hear from her what had occurred, Ms. Paz Dominguez would tell she had interpreted her the staff wanting ██████████ to be present as the ██████████ staff being “extremely resistant to her”.

██████████ stated starting around the beginning of 2018, a couple months after Ms. Paz Dominguez had publically announced her candidacy for Auditor Controller and just after her six month employment probation ended, she noticed what respect Ms. Paz Dominguez had previously shown her was quickly fading. She stated Ms. Paz Dominguez began becoming abrasive towards her when they interacted and this was followed by Ms. Paz Dominguez challenging and/or questioning almost all of her decisions. ██████████ stated Ms. Paz



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Dominguez started micro-managing her and became involved in almost every aspect of her routines. She indicated many of Ms. Paz Dominguez's directives were short-sighted solutions which Ms. Paz Dominguez didn't want to discuss. In retrospect it is believed some of these short-sighted changes may have been implemented in part for Ms. Paz Dominguez's ability to then indicate during her campaigning that she had already brought about change (Note the comments made by Ms. Paz Dominguez in just one article at this link <http://www.times-standard.com/article/NJ/20180505/NEWS/180509893>)

██████████ stated she has had a vacant position in the ██████████ she had been recruiting for to fill. She indicated on several occasions Ms. Paz Dominguez has threatened to eliminate that position. The first time was when ██████████ wanted to conduct a second interview upon a promising candidate and Ms. Paz Dominguez thought her ability to wait long enough to do a second interview was an indication the position didn't need to be urgently filled or possibly even filled at all. After this initial threat, Ms. Paz Dominguez made several more threats and would indicate the CAO was pushing her to eliminate ██████████ positions but nothing ever happened and in retrospect it appears it was just "a scare tactic".

██████████ stated Ms. Paz Dominguez has demonstrated she has a problem with the ██████████ department having a kitchenette and has come over to the ██████████ during working hours and insisted on everyone stopping their work to discuss for 15 minutes why they need the kitchenette. After this meeting was over, Ms. Paz Dominguez insisted on ██████████ coming with her to a private area where Ms. Paz Dominguez talked to her for another hour about the problems with ██████████ having a kitchenette. She stated this example of Ms. Paz Dominguez causing her and her staff to not be able to perform their duties is just one of "countless" times Ms. Paz Dominguez has interrupted their activities to hold an urgent meeting regarding topics which could have waited or been dealt with through a memo or email. ██████████ stated it became apparent Ms. Paz Dominguez relished in her power to be disruptive and engage in sensationalism and then upon having everyone's attention she'd repeatedly just engage in gossip and/or repeat rumors she'd heard. She stated these unannounced and unwelcome disruptive meetings called by Ms. Paz Dominguez caused enormous stress to the staff as they were dealing with deadlines. They furthermore made it difficult afterwards for the staff to focus back on their work instead of thinking about the impact of some major change or new directive Ms. Paz Dominguez had urgently told them about. ██████████ stated her staff complained to her countless times about how adversely Ms. Paz Dominguez's disruptions were affecting them and she was overtime actually able to see a reduction in the staff's performance and work output. This was caused not only by the stress from the meetings but also from her staff having to take time off of work to cope with the stress and anxiety they were suffering from Ms. Paz Dominguez. ██████████ stated she had one of her staff members, ██████████, actually quit her employment and took another job directly due to Ms. Paz Dominguez's actions and behavior. She stated ██████████ approached her about the issues she was having with Ms. Paz Dominguez being too aggressive with her so she had several conversations with Ms. Paz Dominguez on behalf of ██████████ to try and smooth things out. ██████████ stated instead of showing ██████████ some respect for standing up for herself Ms. Paz Dominguez singled ██████████ out in front of her peers and belittled her like a child saying she could not have any



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pizza or sodas because she hadn't helped move furniture. She stated this was the final straw for ██████████ and she found another job not too long afterwards. ██████████ stated other staff members have been found crying and breaking down while at work after they'd had an interaction with Ms. Paz Dominguez.

██████████ stated she was aware of at least two times when Ms. Paz Dominguez was insubordinate to Mr. Mellett. She stated the first incident occurred after Mr. Mellett had put into writing the top priority for the Auditor Controller office was to get the W2C's out and Ms. Paz Dominguez then removed one staff member from that duty without notifying Mr. Mellett or anyone else. The second incident occurred after Mr. Mellett instructed Ms. Paz Dominguez to no longer make direct contact with any staff in ██████████ and Ms. Paz Dominguez used a staff person from another division to summon a ██████████ staff member to her office where she then asked this ██████████ staff member to transfer to a division still under her control and implied his job might be eliminated if he did not take the transfer.

██████████ stated ██████████ approached her and told her Ms. Paz Dominguez had been telling the ██████████ staff things that the ██████████ staff were doing and she wasn't pleased with. She stated she then told ██████████ that she'd take care of it. ██████████ indicated rather than present her side of the issues to ██████████, as Ms. Paz Dominguez was apparently doing, she didn't think it was appropriate to involve the staff with the issues being brought before her. ██████████ stated she was aware that Ms. Paz Dominguez's style of management was different and that Ms. Paz Dominguez often spoke to some of her subordinates about issues she was having with other subordinates. ██████████ stated she is uncomfortable with such a style of management and rather keeps how she is dealing with personnel issues among department heads, management and supervisors. ██████████ stated all of the Auditor Controller staff who were dragged into the current internal issues had only Ms. Paz Dominguez to blame as she and ██████████ did not engage their subordinates in such a manner.

██████████ stated she made numerous attempts to reduce the hostility and aggression being felt by herself and her staff through both one on one conversations with Ms. Paz Dominguez and with group meetings where Ms. Paz Dominguez and the affected staff were present. ██████████ stated in most of these private and group conversations with Ms. Paz Dominguez, Ms. Paz Dominguez denied saying or doing whatever comment or action had been attributed to her. In a few of the conversations it seemed as though the issue at hand had been resolved at the time but the same issue or one very similar would later resurface. She stated only after these attempts resulted in repeated failures to remedy the situation did she contact Mr. Mellett and HR. She stated she believes Mr. Mellett and HR took her complaint seriously and provided a remedy as best they could at the time.

██████████ stated the issues with Ms. Paz Dominguez extend beyond the Auditor Controller ██████████ staff as she has been made aware of the CAO staff, some HR staff, some staff in DHHS, some staff in Purchasing, some staff in Communications, some staff in Economic Development and the staff in one of the special districts the County interacts with having issues with her. She stated even some of the ██████████ staff have approached her with issues they were having with



Ms. Paz Dominguez as they felt Mr. Mellett no longer cared about the staff. The ██████████ staff told her Ms. Paz Dominguez flips back and forth on policies, won't put into writing new policies or changes she implements and is inconsistent from one week to the next on how she wants things done.

██████████ stated she has not engaged in the telling of any off color stories or jokes while at work. She then stated she can think of one occasion where one employee may have interpreted what she and some of the ██████████ staff were talking about as being off color. She explained that they were having a discussion about food for lunch and trying to think of the word "Philly Cheese Steak" but they couldn't come up with it. ██████████ recalled staff members were throwing out words like "beefcake" and "tastycake" while laughing at each other's attempts to think of Philly Cheese Steak. She later learned that one employee who had overheard part of their conversation thought they were describing a man and took offense to such.

██████████ denied making racist remarks or using racial slurs while at work and stated she is unaware of any current staff members doing such. She indicated she has made no attempts to date or flirt with any subordinates, co-workers or supervisors and she is unaware of other employees in the Auditor Controller office doing such. ██████████ is not aware of any Auditor Controller employee receiving or being threatened with unjustified discipline, demotion, failure to promote or undesirable/unreasonable assignments.

INFORMATION FROM ██████████ SECOND STATEMENT OF 04/24/2018:

██████████ was shown the photographs taken by Ms. Paz Dominguez of the ██████████ office after the staff had left in her effort to document confidential information was being left out. She stated she is completely confident the photograph of the W2C's piled upon a table was staged by Ms. Paz Dominguez as ██████████ personally covered the W2C's up each night with a tarp and the tarp is nowhere in the photograph. She added that Ms. Paz Dominguez claim that because documents were left out on desks, they were available for the custodians or janitors to look at is misleading. ██████████ stated unless documents are locked up in locking drawers or locking cabinets, janitors and custodians can access any document left in an employee's drawer, cabinet or in-box and Ms. Paz Dominguez is fully aware of such. She added that Ms. Paz Dominguez is also fully aware that the ██████████ ██████████ has no locking drawers or locking cabinets to utilize and as such Ms. Paz Dominguez has never indicated confidential documents need to be locked up because that's impossible. ██████████ stated she believes the real reason Ms. Paz Dominguez took the photographs, especially the staged one, is that she is making every effort that she can to discredit everybody in the ██████████ ██████████ and make them look incompetent so that she can come across as the hero or the person most capable of being able to remedy the situation in the upcoming election. She added that there are enough anti-establishment voters in Humboldt County that Ms. Paz Dominguez's portrayal of being a rebel trying to buck the system will likely allow her to win the election.



██████████ stated Ms. Paz Dominguez telling the media that “many of the issues in the Auditor Controller department stem from a power struggle between herself and the ██████████ department” is untrue and a direct defamation of her character as the manager of the ██████████ department. She explained that the “power struggle” if there was any, was between Ms. Paz Dominguez and Mr. Mellett. ██████████ had no authority to countermand any directives from Ms. Paz Dominguez and rather it was Mr. Mellett who had restricted Ms. Paz Dominguez’s authority over ██████████. She stated Ms. Paz Dominguez’s assertion to the media that ██████████ was responsible for the security breaches is another untrue statement as the security breach Ms. Paz Dominguez referred to occurred not as a result of anything ██████████ did but rather as a result of the CAO office and the Auditor Controller office not providing a means of securely storing their records. ██████████ indicated because Ms. Paz Dominguez made untruthful comments to defame her as the manager of ██████████, Ms. Paz Dominguez is not entitled to use “truth” as her defense. Additionally, Ms. Paz Dominguez was negligent in providing these stories to the media before determining if they were factual. It was further indicated this action by Ms. Paz Dominguez may be an infringement upon ██████████ rights afforded to her through her employment with the County.

As a direct result of Ms. Paz Dominguez most recent contact with the media, ██████████ has reported to ██████████ that she has had a marked increase in ██████████ while at work. She stated she has had to deal with a marked decrease in the confidence of her staff to perform their jobs without making errors and some staff members have complained of suffering physical and mental symptoms of stress. ██████████ stated she is aware of at least a couple instances when staff have called out sick due to the increased stress symptoms caused by Ms. Paz Dominguez’s comments to the media. She was also aware of another employee who had to recently increase her dosage of anti-anxiety medication and employees who have begun looking for employment elsewhere.

██████████ stated she does not believe, as some of the County Administrators have indicated they believe, that Ms. Paz Dominguez can be taught or coached into acting appropriately in her role. She explained that in her observation over the last nine months, attempts by administrators and Mr. Mellett to do just that have resulted in Ms. Paz Dominguez becoming more volatile and demonstrating destructive behaviors. ██████████ stated instead of Ms. Paz Dominguez trying to learn management skills and improve upon her “rough areas”, she attacks staff members and retaliates against anyone who tries to counsel or constrain her. She stated since Mr. Mellett asked Ms. Paz Dominguez to no longer directly contact ██████████ Ms. Paz Dominguez has taken actions on an almost daily basis to defame ██████████ and hinder their abilities to perform their duties. These actions range from taking away staff members to going to the media and providing false information in some cases.

██████████ stated prior to Ms. Paz Dominguez recent contacts with the media she did tell Ms. Paz Dominguez that her going to the media may cause more harm than good. She stated instead of heeding her advice Ms. Paz Dominguez pushed her into providing information to the media as well. She explained that Ms. Paz Dominguez called her into her office unexpectedly and upon arriving there Ms. Paz Dominguez stated she had Ryan Burns from the Lost Coast Outpost on



the phone, Ms. Paz Dominguez stated she had already told her side of the story to Mr. Burns and now Ms. Paz Dominguez wanted to hear her answers regarding the W2 discrepancies. She stated she did answer the questions and her responses did appear in the story Ms. Paz Dominguez initiated.

██████████ stated as a direct result of Ms. Paz Dominguez contacting the media she has been contacted by a few non County employees who wanted to know what was going on. She stated these were people who would not normally ask her questions about her work. ██████████ stated being put in such a position was very upsetting and aggravating. She stated she feels even worse for her staff in that she was unable to provide them a layer of protection which should have existed within the boundaries of issues between management and supervisors versus the rank and file.

██████████ stated her belief that personnel issues with County of Humboldt employees are confidential and by policy handled internally. She stated by Ms. Paz Dominguez acting in her capacity of Assistant Auditor Controller broke County confidential policies by exposing County employees “mistakes” to the media and furthermore she provided information she had only been privy to due to her administrative position. She indicated this was an obvious abuse of her power and a breach of employee’s privacy. ██████████ added that Ms. Paz Dominguez revealing to the media what she did has caused citizens to lose faith in the County and created liability through her public acknowledgment of security issues which may encourage litigation. She stated that Ms. Paz Dominguez was well aware of this potential as the County had already faced threats of being sued and had compensated those persons making such threats with paid credit protection.

Charging Party ██████████

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██████████ has been employed with Humboldt County in the Auditor Controller office since ██████████ and has been at her current position for approximately ██████████ year. Her immediate supervisor is ██████████ ██████████ has known Ms. Paz Dominguez since Ms. Paz Dominguez began her employment with the County ██████████ She has known ██████████ for “a long time” and they consider each other to be good friends outside of work and do social activities with one another. She’s never had a falling out with ██████████ ██████████ but considers the current situation with Ms. Paz Dominguez to be a falling out.

██████████ essential duty is to process the ██████████ for the County. She estimated 60 hours of her 80 hours is spent just performing her duty of getting employees ██████████ ██████████. The remaining hours are spent taking care of the employees ██████████ ██████████, figuring out any discrepancies and interacting with employees regarding any problems



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they've had with their ██████████

██████████ stated she knows what the EAP is but has not utilized it. She has referred the EAP to a co-worker who was having issues at home but has never referred it to any employee related to work issues. She's never filed a workplace stress or anxiety claim against any employer but she has previously been involved in workplace investigations as a victim and as a witness. ██████████ is aware of Humboldt County's anti-harassment and anti-discrimination policies but has not recently reviewed either.

██████████ stated she believes she is a protected class under ADA. She indicated ██████████ She stated it does affect her everyday life activities and she performs ██████████ ██████████ stated the County was made aware of her ██████████ At the request of Ms. Paz Dominguez in approximately October or November of 2017, ██████████ provided ██████████ to Ms. Dominguez. She stated in the last couple months she's suffered a significant increase ██████████ all of which she attributes to the stress imposed upon her by Ms. Paz Dominguez. She indicated she's never previously experienced ██████████ ██████████ has not yet filed a workers' compensation claim for her stress. ██████████ indicated however that her medical records at her regular doctor do now reflect an increase in her visits to the doctors and her reporting the cause of her additional stress as being from Ms. Paz Dominguez.

██████████ stated in an effort to stop the hostile work environment Ms. Paz Dominguez has created ██████████ have spoken directly to Ms. Paz Dominguez, they have spoken directly to Mr. Mellett and they have spoken directly to ██████████ ██████████. She stated as a result of their complaints to these parties Ms. Paz Dominguez has "absolutely" retaliated against them subtly by turning away from them when they meet, no longer returning their greetings when they say "good morning" or "hello", "having a snotty attitude when she does talk to them" and "de-friending" all of them from her Facebook account. More overtly, Ms. Paz Dominguez has retaliated against them by putting derogatory postings about them upon her Facebook and making negative remarks about them to the media.

██████████ stated prior to Ms. Paz Dominguez being hired, the ██████████ department held scheduled biweekly meetings with the Auditor Controller and Assistant Auditor Controller. Additionally they would seek advice from either or both the Auditor Controller or Assistant Auditor Controller when dealing with important issues or when serious situations came up. Other than that the ██████████ department was fairly autonomous and performed their day to day work under the ██████████ manager and assistant manager. ██████████ stated when Ms. Paz Dominguez was hired she wanted to oversee everything ██████████ was doing and became involved in the day to day duties they were performing. She stated Ms. Paz Dominguez becoming more involved was not by itself an issue but rather it was the manner in which she became involved that became a detriment to the office. ██████████ explained that instead of knowing she had the authority over



██████████ Ms. Paz Dominguez made it a point to assert her authority as though she was trying to make a point where none was needed. She stated Ms. Dominguez makes “a scene” or has “an outburst” when she comes over to ██████████ and has actually repeatedly stated, “I’m the boss” when interacting with ██████████ staff. ██████████ stated because the ██████████ has mandated times to complete their jobs they don’t have a lot of spare time to stop production so Ms. Paz Dominguez can nit pick and question insignificant details and they’d rather be left alone to do their jobs unless there is a problem which needs to be addressed. She stated even if Ms. Paz Dominguez only came in unscheduled and disrupted their work for 30-60 minutes, that is enough to cause a serious impediment, especially if she does such when they’re shorthanded or ██████████ that day. ██████████ stated as a direct result of Ms. Paz Dominguez interrupting their work days some ██████████ staff members, including herself, have had to work late to complete tasks which had to be finished that day.

██████████ stated Ms. Paz Dominguez has seemed to single her out as she seems to come to ██████████ many times when ██████████ is out for a meeting or an appointment. She stated because those things occur infrequently for ██████████ it became apparent Ms. Paz Dominguez was specifically choosing those times to come by and it was “much too often to be a coincidence”. She stated ██████████ kept her schedule on a calendar which was open for viewing so it was easy for Ms. Paz Dominguez to choose her visiting times accordingly. ██████████ stated it reached a point where she jokingly said to ██████████ when ██████████ scheduled in a two hour meeting on her calendar, “I hope Karen doesn’t find a reason to come by during those two hours.” ██████████ stated Ms. Paz Dominguez would during many of her visits to payroll try to get her to make a decision which would affect the entire ██████████ division and ██████████ would usually ask if the decision could wait until ██████████ returned. ██████████ stated on almost each occasion Ms. Paz Dominguez would then respond, “██████████ doesn’t need to be here to talk about this”. She stated that type of management was not the manner in which ██████████ was operating and rather they had been utilizing weekly staff meetings to discuss changes so everyone could participate and the best ideas could be implemented. ██████████ stated Ms. Paz Dominguez knew this was how they operated as Ms. Paz Dominguez attended several of their weekly meetings to listen in when she was first hired but then stopped coming for unknown reasons.

██████████ stated in retrospect, she believes a turning point for when Ms. Paz Dominguez started picking on her specifically was after she had a conversation with Ms. Paz Dominguez regarding Ms. Paz Dominguez missing her kids school events because she is always working late and working weekends. ██████████ stated as a fellow parent and at the time friend of Ms. Paz Dominguez, she suggested Ms. Paz Dominguez make the time to go to her kids events because their childhood passes so quickly. She stated after making this comment she immediately saw in Ms. Paz Dominguez’s face she was “pissed off” and her voice inflexion also changed to reflect her anger. She realized after making this comment that Ms. Paz Dominguez has probably made the choice to put her career ahead of her family in some ways and she may have hurt her feelings to be reminded of such. ██████████ stated it was shortly after this conversation that Ms. Paz Dominguez failed to recognize in the slightest way her ██████████ year mark with the County even though Ms. Paz Dominguez had just recently held a big party for an employee in another



division upon them reaching the ██████ year mark. ██████ stated prior to these two events she had been a supporter of Ms. Paz Dominguez and had even gone to the Board of Supervisors meeting to support her when she spoke during the public comment time.

██████████ stated while Ms. Paz Dominguez has never physically threatened her or directly threatened her job, Ms. Paz Dominguez has implied on many occasions that her job was in jeopardy. She explained that Ms. Paz Dominguez has on several occasions told her directly, “I don’t know why there is an ██████████ in the ██████ division”. ██████ stated she believes this is a legitimate threat as she is not in the union and thus does not have its protection and it is her understanding Ms. Paz Dominguez has the ability to either eliminate her position by herself through reorganizing the division or at the very least propose and argue such to the person(s) who could reorganize and eliminate her position. She added that if Ms. Paz Dominguez is elected into the Auditor Controller position she will very likely lose her position with the County and as such she’s already begun looking for another job. ██████ stated other employees in the Auditor Controller office feel the same way and it’s a shame staff members with so many years of experience and knowledge could leave because of one person who has less than one year of experience with the County.

Regarding ██████ ADA protected class, ██████ stated she actually told Ms. Paz Dominguez that the aforementioned situations and conversations at work were causing her symptoms to significantly become worse. She stated Ms. Paz Dominguez responded, “are you sure your symptoms aren’t getting worse because of your home life?” ██████ stated she responded, “no, it’s from here, this tension is upsetting to me and I don’t want it to continue”. She stated she didn’t feel comfortable enough to come right out and say, “I want you to stop acting the way you are” but believes she was specific enough in describing the causes for her to understand she was the source of her stress. ██████ stated **Ms. Paz Dominguez then completely shocked her by suggesting she try smoking marijuana to relieve her stress.** She stated Ms. Paz Dominguez then stated, “if we talk outside later I can get you some”. ██████ stated she was dumbfounded as she does not use marijuana nor has she ever given out any indication she was remotely interested in trying such. She stated this comment by Ms. Paz Dominguez was not appreciated and seemed inappropriate if not illegal being she was recommending it and willing to supply it for a medical condition and not for recreational use.

██████████ stated the ██████ division staff have learned that Ms. Paz Dominguez was playing both sides of a perceived division between ██████ and the other Auditor Controller divisions and in doing so she exasperated the situation to a breaking point. She stated Ms. Paz Dominguez used to come over to ██████ and tell them the other divisions “don’t like you” or “the staff in the other divisions overheard you saying something bad about them” or “the staff in the other divisions don’t think it’s fair you have the kitchenette” or “the staff in the other divisions wants to be able to do what you do”. ██████ learned that Ms. Paz Dominguez was at the same time complaining to the other divisions about how the ██████ staff acts and then indicating she was on their side by telling the other division staff members, “maybe those perks the ██████ division gets won’t be around much longer”.



██████████ stated having Ms. Paz Dominguez come and disrupt ██████████ was bad enough when things were running smoothly but when ██████████ made an error while utilizing a new console for the W2s Ms. Paz Dominguez made the stress within the ██████████ division go beyond anything she's ever had to deal with. ██████████ explained they had to issue 2500 W2C's and in a cost savings idea Ms. Paz Dominguez decided to have the employees come into the Auditor Controller office to pick them up rather than mailing them. She stated what was taken into account by Ms. Paz Dominguez was that every time an employee would come into pick up their W2C it would take between five and ten minutes of one employees time to go to the front counter, get the employee's ID, go back to the W2C's, pick out the correct W2C, walk it back up to the front counter, give the W2C and ID back to the employee, go back to their desk and try to restart what they were doing. The cost in lost time far exceeded the cost of the postage required to mail out the W2C's.

██████████ stated in mid-February Ms. Paz Dominguez had an outburst towards her when she told Ms. Paz Dominguez her medical disability was preventing her from working weekends as Ms. Paz Dominguez had requested she do. She explained she was already staying at work late to get the W2C's out and due to her increased symptoms from the stress Ms. Paz Dominguez was placing upon her she had to say no to the weekend request. ██████████ stated just a short time later Ms. Paz Dominguez complained to ██████████ that because ██████████ was unwilling to work weekends extra help personnel were going to have to come in and pick up the slack. She stated from that time on Ms. Paz Dominguez singled her out for even more criticism and uncalled for work interruptions and as a result she believes she is being retaliated against due to her ADA status.

██████████ stated she does not engage in telling off color jokes or stories but is aware that someone in one of the other Auditor Controller divisions complained she had done such. She explained she had been involved in a conversation regarding the funny names of sandwiches some company was using, such as beef steak and whomever heard them heard them laughing and heard words which when taken out of context could sound inappropriate.

INFORMATION FROM ██████████ SECOND STATEMENT OF APRIL 24, 2018:

██████████ stated Ms. Paz Dominguez had created even a more hostile work environment than had existed when we took her first recorded statement approximately one month prior. She stated Ms. Paz Dominguez went to the media with issues which had already been resolved, thus disparaging the employees within the ██████████ division in a public forum. ██████████ stated Ms. Paz Dominguez revealed the mistakes which had been made with the W2s and with attachments containing confidential information sent in an email. ██████████ stated she and the other payroll employees had already been "pounded" from these errors and there was no reason for Ms. Paz Dominguez to bring such up other than her own personal gain in the upcoming election. She stated the issues had already been addressed and resolved by the time Ms. Paz Dominguez revealed them to the media. She indicated it is her belief that Ms. Paz Dominguez had used confidential information she had only been privy to through her position with the County to the



detriment of the ██████████ staff by reporting such to the media. ██████████ stated Ms. Paz Dominguez revealed this information to both the Lost Coast Outpost and the North Coast Journal.

██████████ acknowledged that Ms. Paz Dominguez did not provide names of employees when providing information to the media but stated she still violated the confidentiality of the ██████████ employees as they all reside in a relatively small community and there are very few employees within the ██████████ division.

██████████ stated she had heard Ms. Paz Dominguez had gone through the ██████████ office during one evening and took photographs of documents that had been left out in the open. She stated she could not understand what would have motivated Ms. Paz Dominguez to do such as nobody was denying it was happening and they'd been doing it for at least ██████████ years. ██████████ added Ms. Paz Dominguez had never once asked if files were being put away at night or indicated that such was a problem until she went to the media. She added that unless Ms. Paz Dominguez had the intent of using the photographs to show ██████████ didn't have the ability to keep the files secure and was requesting funding for locking cabinets, nothing positive could have come of such. ██████████ indicated to her knowledge that was not the case and rather Ms. Paz Dominguez was keeping the photographs as her proof, if the need came up to defend what she was telling the media in her effort to become elected, and that was completely self-serving. She stated the ██████████ department does have locking cabinets but they have never had the keys to utilize the locks for these cabinets since she began her employment. As such, for Ms. Paz Dominguez to tell the media ██████████ was being derelict in their duties to protect confidential information was a defamation of character to the employees of the ██████████ division. ██████████ became visibly shaken and upset when she was then shown copies of the photographs Ms. Paz Dominguez had provided to us during our investigation. She admitted that some of the photographs depicted her own desk with files opened upon it, other photos depicted ██████████ desk and some photographs were of a table which had the W2Cs they had been working on.

██████████ stated the media sources Ms. Paz Dominguez went to apparently believed they were being provided information to reveal unscrupulous acts like a whistler blower might do. However, it was apparent to those in ██████████ Ms. Paz Dominguez was doing it to get her name known for the benefit of the upcoming election and was throwing everybody else under the bus in the process. She stated the fact Ms. Paz Dominguez told nobody she was going to talk to the media before she did and the staff had to learn about it from the actual article is telling of her motivations. If she had really thought some of the issues she spoke of to the media were really still problems Ms. Paz Dominguez would have made some effort to remedy them before going to the media. ██████████ then described Ms. Paz Dominguez as “being the most counterfeit person she's ever met” as she really looked the look and talked the talk but it's become apparent it was just a façade to help in the upcoming election.

██████████ stated five people in her personal life and not employed by the County have approached her since Ms. Paz Dominguez's latest article was published and asked her what was going on in ██████████ She stated none of these five people has she spoken to her about work



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related issues in the past and their questions were a direct result of Ms. Paz Dominguez revealing to the media confidential information she obtained only through her position with the County. In addition to these five people, ██████████ has been approached by many County employees who want to either know what is going on or want to say they are sorry about the situation. She stated some of the County employees who've approached her were barely even acquaintances so it was awkward and uncomfortable to undergo such encounters.

██████████ stated she is fairly confident Ms. Paz Dominguez has been falsifying her time sheets to the County. She explained that during the last four weeks Ms. Paz Dominguez was rarely in the office yet when they reviewed her time sheets for payroll she was claiming to be working 9-12 hours per day. ██████████ thought this was ironic as Ms. Paz Dominguez had reported to the media other employees in the Auditor Controller office were coming in late and leaving early.

██████████ stated she was physically affected by Ms. Paz Dominguez latest contact with the media in that she became extremely emotional which then progressed into ██████████ which remains with her. She stated her sleep has been adversely affected and she can't get even one good night of sleep. ██████████ stated her relationship with her co-workers not in the ██████████ division has deteriorated and she now tries to "disassociate" herself from work and leave right at 5 pm instead of staying until late to get the work completed like she used to. She stated the work environment for her has gone from being hostile to being both hostile and "unhealthy".

██████████ stated before Ms. Paz Dominguez last spoke with the media she emailed Ms. Paz Dominguez and asked her to please stop talking to the media because it was causing her problems. She stated Ms. Paz Dominguez did not respond to her email but ██████████ still has it if we need to show that efforts were made to stop Ms. Paz Dominguez and that she knew she was causing harm.

Charging Party ██████████

██████████ has been with the Auditor's office for approximately ██████████ years. Her immediate supervisor is ██████████ followed by ██████████ She has known ██████████ for ██████████ years and acknowledged they do social activities together outside of work and they've never had a falling out. ██████████ has known Ms. Paz Dominguez since Ms. Paz Dominguez began her employment with the County. She has never done anything socially with Ms. Paz Dominguez and considers the situation they are currently in to be a falling out with her.

██████████ stated her most essential duty is to perform "on boarding and inputting for new hires" and promotions. She is not a protected class under ADA and has never filed a stress or anxiety claim with any employer. ██████████ was made aware of the Humboldt County



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anti-harassment and anti-discrimination policies when she was first hired.

██████████ stated no supervisor or co-worker has ever threatened her in any manner and she has never felt threatened or intimidated by a co-worker or supervisor. She has never utilized the EAP nor has she ever referred any county employee to such.

██████████ believes she has been treated differently than her peers at work but such differing treatment was not due to her age, race, color, sex, national origin, religion or sexual preference/identification. She stated she was at first treated differently than her peers by Ms. Paz Dominguez who has been favoring the employees within all the departments other than ██████████. ██████████ stated after Ms. Paz Dominguez initiated the different treatment her subordinates within the other departments began following her lead and also started treated her differently than their other peers. She stated Ms. Paz Dominguez has caused a rift between ██████████ employees and the other divisions employees by playing both sides. She explained that Ms. Paz Dominguez is talking poorly about the ██████████ employees to the other divisions and then comes into ██████████ and states, “this is what the other employees are saying about you in ██████████” even though Ms. Dominguez is the one who put it in their heads. ██████████ stated Ms. Paz Dominguez has also made attempts to further alienate the ██████████ employees from other departments such as HR. Specifically, she stated Ms. Paz Dominguez told ██████████ from HR she could no longer go into the ██████████ side of the auditor’s office where previously ██████████ used to be able to come there so they could work together. Later when Ms. Paz Dominguez was questioned about this she denied telling ██████████ that, claimed it was miscommunication even though ██████████ specifically recalled Ms. Paz Dominguez saying she could not go back to ██████████.

██████████ stated she has knowledge of Ms. Paz Dominguez harassing an employee named ██████████ who no longer works for the County. She stated one specific incident occurred shortly after Ms. Paz Dominguez was hired and has asked everyone to help her move things about in the office to open it more up. ██████████ stated many employees then began to move things, including herself and ██████████ but while in the process of doing this Ms. Paz Dominguez came in and told everyone to stop as she wasn’t sure what she wanted to do yet. Later that same day Ms. Paz Dominguez had the employees start moving again and brought in pizza and sodas for everyone. She stated when ██████████ and her walked over to where everyone was Ms. Paz Dominguez told her in front of all her peers, “no, no, you can’t have any, you didn’t help”. ██████████ stated she spoke up and stated ██████████ had helped and listed off the things ██████████ had done earlier but as she was doing that ██████████ turned bright red and then just walked off as she had become very mad and pissed off. She stated the same thing then happened shortly afterwards to ██████████ when again Ms. Paz Dominguez told ██████████ in front of everyone that she could not have any pizza or sodas because she hadn’t helped move. She stated while ██████████ really didn’t care because she had already eaten lunch, ██████████ later shared with her that she had felt very humiliated. ██████████ reportedly now works for ██████████.

██████████ stated in the past she has witnessed Ms. Paz Dominguez to harass ██████████



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██████████ by being very “harsh” when talking to her. She stated that situation seems to have resolved itself and it appears ██████████ is no longer being treated harshly.

██████████ stated Ms. Paz Dominguez style of management “is like a hammer” where she’ll just come over to ██████████ made a disruption, forcefully say things which get everyone worked up and feeling intimidated and then just walk away. She stated this was especially true when ██████████ was not present as that made everyone uncomfortable and Ms. Paz Dominguez would insist ██████████ didn’t need to be present. ██████████ stated in all the many times Ms. Paz Dominguez came over while ██████████ was absent, there was not one time when the actions being requested or questions being asked were so pressing that it could not wait for ██████████ to be back. She added that in retrospect it is apparent Ms. Paz Dominguez was coming to ██████████ when ██████████ was absent so that ██████████ could be bypassed. She explained ██████████ alone would stand up to Ms. Paz Dominguez and engage in her “in a diplomatic manner” to resolve issues while Ms. Paz Dominguez just wanted to make demands without any feedback. ██████████ added that when ██████████ would question Ms. Paz Dominguez about things Ms. Paz Dominguez had told her subordinates in her absence, Ms. Paz Dominguez would deny making such comments or say her comments were misunderstood.

██████████ stated other than when Ms. Paz Dominguez has called “urgent” impromptu meetings or come to ██████████ to demand things, no comments or conduct from any of her co-workers or supervisors has prevented or interfered with her performing her duties.

██████████ acknowledged she was one of three employees who filed a complaint with HR accusing Ms. Paz Dominguez of creating a hostile work environment. She was not aware of anyone else making any similar complaints. ██████████ stated she has no information that HR or the County administration knew or should have known prior to the filing of their complaint that Ms. Paz Dominguez was creating a hostile work environment but was aware ██████████ had spoken to HR about some issue(s) regarding Ms. Paz Dominguez. She stated none of the actions or comments from Ms. Paz Dominguez which created a hostile work environment took place in the presence of Mr. Mellet or anyone from HR. ██████████ stated prior to her joining in and filing the complaint against Ms. Paz Dominguez she made no effort to reduce or stop Ms. Paz Dominguez’s inappropriate actions or comments. She stated it is her belief that everyone in the Auditor Controllers office along with HR and the CAO offices have been adversely affected by Ms. Paz Dominguez’s actions and comments.

██████████ stated Ms. Paz Dominguez “did a lot of posting” on her Facebook which upset a lot of employees in the ██████████ division of the Auditor Controller office. She stated her posting began after just a few days of Ms. Paz Dominguez’s employment with the County. She stated Ms. Paz Dominguez would make specific references in her postings to things she disagreed while at the same time being somewhat vague about whom she was referring to. ██████████ stated however that anybody working for the County who interacts with the Auditor Controller office would have known whom she was referring to.

██████████ stated she does fear retribution from Ms. Paz Dominguez if she is elected



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Auditor Controller as she has already demonstrated doing such after she filed a complaint against Ms. Paz Dominguez. She gave as an example two employees from other divisions, ██████████ and ██████████ who had come to ██████████ every morning to get coffee and then immediately stopped coming over at all after Ms. Paz Dominguez was notified of the complaint. When ██████████ was asked why he had stopped coming over he stated Ms. Paz Dominguez told them (the other divisions) that ██████████ didn't want any of them to come over to ██████████ any longer. ██████████ stated she doesn't know what she is going to do if Ms. Paz Dominguez is elected Auditor Controller but plans on just trying to "keep her head down" until she can find some other job if the situation gets worse. She stated she doesn't need to be happy at work, all she needs is to be able to do her work and go home without being harassed.

██████████ indicated she has not engaged in off-color jokes or stories while at work and is not aware of any current County employees doing such. ██████████ indicated she has never made racist remarks or used racial slurs in front of any County employee nor is she aware of any other County employee doing such. She stated no County employee has engaged her in unwelcome conduct.

██████████ has made no attempts to date or flirt with any of her co-workers or supervisors and no County employee has done such to her. She had no knowledge of any County employee being rebuffed by another County employee in their advances towards them.

██████████ stated neither she nor any other County employee she is aware of, been threatened with or received unjustified discipline, a demotion, failure to promote or unreasonable assignments.

██████████ stated her belief in how best to resolve the issues between Ms. Paz Dominguez and the payroll staff is to have Ms. Paz Dominguez follow the established chain of command and go through ██████████ only when wanting to make changes or issue directives.

Witness ██████████
██████████
██████████

██████████ began her employment with the County approximately ██████████
██████████
██████████ and has been at her current position the last ██████████
Because ██████████ actually works for ██████████ she has two immediate supervisors, ██████████
██████████ with ██████████ and Ms. Paz Dominguez.

██████████ stated her essential duty is to perform invoice approval for ██████████. She is not a protected class under ADA. She has known Ms. Paz Dominguez three months and has no



relationship with her outside of work. ██████████ has known ██████████ the same amount of time and has no relationship with her outside of work. She admittedly feels closer to Ms. Paz Dominguez as they interact daily and she does not see ██████████ very often.

██████████ stated she has become aware of various staff members having communication issues with one another which has led to some problems in the office. Specifically, she's been made aware via emails that within the last month Ms. Paz Dominguez and members of ██████████ are having problems with each other. She believes some of the problems stem from Ms. Paz Dominguez being "very aggressive and very passionate" in how she words her emails and that Ms. Paz Dominguez "would benefit by having someone (neutral) read her emails and tone them down a little bit" before she sends them. Specifically, she felt that some of the emails sent by Ms. Paz Dominguez could have been interpreted "as being rude" because she failed to "set the tone or make a personal connection" to the recipient. ██████████ stated she is typically "in a bubble and out of the loop" so her being forwarded these emails by ██████████ allowed her to see what was affecting her co-workers. ██████████ gave her opinion that she thought the issues between Ms. Paz Dominguez and ██████████ were mostly "silly" and "very petty". She stated prior to seeing the emails all she knew was that a lot of the staff were whispering to each other and getting very upset. She stated her understanding of what happened also came from Ms. Paz Dominguez holding meetings and during one of these she told the staff she had offered to let accounting help ██████████ with the W2C's and it was not accepted but then when it came to "crunch time" ██████████ suddenly wanted their assistance. Then just several days ago, Ms. Paz Dominguez appeared to be "very frustrated" and told the accounting and auditing staff they needed "to balance their duties" and as such they could not assist payroll in the manner payroll wanted assistance. ██████████ acknowledged she was unaware of the tension between payroll and Ms. Paz Dominguez until she was included in the email chain and Ms. Paz Dominguez held a few meetings regarding issues affecting her. In regards to one such meeting held by Ms. Paz Dominguez, ██████████ stated she didn't think it was necessary and in her opinion "it was a little over the top". She stated in her opinion the problems between the divisions has become "fairly widespread" and now also includes the CAO office and HR. ██████████ stated in one meeting which Ms. Paz Dominguez held for the accounting and auditing staff, Ms. Paz Dominguez informed them she had been told by Mr. Mellett not to communicate directly with ██████████ any longer. She indicated her belief in why Ms. Paz Dominguez told the staff this information was due to Ms. Paz Dominguez "wanting to talk to somebody and tell them why she was in a bad mood". She stated that specific meeting let the staff know what Ms. Paz Dominguez was "having to deal with". ██████████ stated when Ms. Paz Dominguez has used meetings "to vent" to her staff, the staff didn't necessarily need to know the details but it was useful in her opinion to know why Ms. Paz Dominguez "was having a hard time and that she was upset with ██████████ and not her own division". ██████████ admitted she has found herself taking sides with Ms. Paz Dominguez because Ms. Paz Dominguez has been so forthcoming to them but she also tries to keep in mind she's not hearing both sides.

██████████ stated while she has not kept any type of notes on the behavior of staff or supervisors, she is aware that ██████████ has been keeping notes and forwarding emails to herself in regards to issues pertaining to ██████████ and Ms. Paz Dominguez.



██████████ stated she believes the remedy to solving the issues between Ms. Paz Dominguez and ██████████ is to have Ms. Paz Dominguez “work on her communication skills”. She recalled Ms. Paz Dominguez once held a meeting with accounting and auditing staff specifically to work on communication and Ms. Paz Dominguez became upset while a couple of the staff got emotional and one started crying. ██████████ recalled a lot of staff were frustrated in that meeting because they were unable to understand what Ms. Paz Dominguez had been trying to accomplish.

Witness ██████████

██████████ has been employed with Humboldt County since October, ██████████ and has been at her current position ██████████ Her direct supervisor is Ms. Paz Dominguez and she first met her when Ms. Paz Dominguez became the Assistant Auditor Controller. She has known ██████████ since October, ██████████ and has no relationship with her outside of work. ██████████ has no relationship with Ms. Paz Dominguez and has not had any type of falling out with her or ██████████.

██████████ stated her essential duties are to supervise the front desk, to answer questions regarding any accounts receivable entry or procedure, to approve journals for the County, to maintain budgets and to handle multiple funds. She is not a protected class under ADA and has never utilized the EAP. ██████████ has been involved in a prior work place investigation when she was required to testify as a witness in an embezzlement case. ██████████ has never filed a stress or anxiety claim against any employer. She acknowledged receipt of information regarding Humboldt County’s anti-harassment and anti-discrimination policies when she first began her employment.

██████████ stated no current co-worker or supervisor has threatened or harassed her in any manner nor has she ever felt threatened or intimidated by any current supervisor or co-worker. She does not believe she has been treated differently than her peers by any co-workers, supervisors or clients. ██████████ stated she is not aware of any co-worker or supervisor who has been treated differently due to their age, race, color, gender, national origin, religion, sexual preference or sexual identification.

██████████ stated to her knowledge, “pretty much everybody in ██████████ is upset with Ms. Dominguez”. She stated in her opinion most of the complaints from ██████████ about Ms. Paz Dominguez seem “petty” and she believes ██████████ needs to comply with the directives from Ms. Paz Dominguez as she is now their supervisor. ██████████ has admittedly been getting her information from Ms. Paz Dominguez and described her as being “incredibly transparent” when it comes to telling her everything that is going on. She stated from what she has been told by



Ms. Paz Dominguez, ██████████ has an understanding that ██████████ does not have the attitude that they have to comply with Ms. Paz Dominguez’s requests and they feel they can do their jobs the way they want to. Specifically, Ms. Paz Dominguez told her ██████████ objected to having their little kitchenette closed down and to start using the common break area like everyone else in the office. She stated Ms. Paz Dominguez also informed her ██████████ tried in multiple ways to get out of coming to the front counter to greet employees getting their W2Cs and went as far as getting Mr. Mellett to back them. ██████████ admitted she has told Ms. Paz Dominguez that she was on her side in regards to how she has tried to handle ██████████. However, ██████████ also stated she was “very upset with Ms. Paz Dominguez” for putting everyone in the office in the middle of her dispute with ██████████. She reiterated that the whole thing “seemed incredibly silly, petty and ridiculous”. ██████████ further stated that what is going on between Ms. Paz Dominguez and payroll “is causing her a lot of anxiety and stress to the point where she’d rather not come to work right now”. She stated everybody seems to be taking sides even though people had tried to stay out of it. ██████████ stated the tension in the office became obvious about two months ago and continually got worse until it reached a critical level approximately one to two weeks ago. She stated she took it upon herself to try and ease some of the tension by contacting ██████████ ██████████ together and telling them the situation between them and Ms. Paz Dominguez has made her and others “really upset”. She stated ██████████ then assured her she would take care of it. ██████████ added that she has not observed any behavior or heard any comments from ██████████ which would have led her to believe a conflict even existed between them and Ms. Paz Dominguez. She stated it has been Ms. Paz Dominguez alone who has been telling her about the issues and has made her “feel like the child in a divorce”. ██████████ stated she believes “everyone in the Auditor-Controller office” has been affected and made “uncomfortable” by the situation between Ms. Paz Dominguez and ██████████.

██████████ stated she is aware that Ms. Paz Dominguez has been taking extensive notes and taking photographs related to her allegations against ██████████ staff. She was not aware of anyone else taking notes or otherwise documenting the situation. ██████████ stated she has personally observed some of the photographs taken by Ms. Paz Dominguez.

██████████ offered as her possible solution to the situation between Ms. Paz Dominguez and payroll, that Ms. Paz Dominguez “chill” and “stop feeling that she has to battle every little thing”.

Witness ██████████
██████████
██████████
██████████

██████████ has worked for the County of Humboldt ██████████ years and has been at her current position since January, ██████████. Her direct supervisor is Karen Paz Dominguez. She first



met Ms. Paz Dominguez and ██████████ when she began her employment with the County. She has no relationship with either of them outside of work and has never had a falling out with them.

██████████ identified her most essential duties as answering the telephone, taking in receipts and responding to customer questions. ██████████ indicated she was not a protected class under ADA and has not utilized the EAP. She was not aware of any staff member who has sought out counseling due to the work environment. ██████████ has never been part of any prior work place investigation and has never filed a work related stress/anxiety claim against any employer. She indicated she was provided with and has read the Humboldt County anti-harassment and anti-discrimination policies. Additionally, she believes she watched a video presentation on such when she was first hired.

██████████ stated neither she nor anyone she knows of at work has received or threatened with undeserved discipline, demotion, failure to promote or undesirable assignments.

Regarding the situation between Ms. Paz Dominguez and the staff in the ██████████ division, ██████████ stated she can tell they aren't getting along but hasn't seen any overt acts of harassment. She stated her only real knowledge of what's going on between them has come directly from Ms. Paz Dominguez who has forwarded her emails. ██████████ didn't understand why she was being included in receiving these emails from Ms. Paz Dominguez as they pertained to Ms. Paz Dominguez engaged in some "petty" "work place bickering" with the ██████████ staff. She stated Ms. Paz Dominguez never explained to her why she received the emails but the emails themselves began with "FYI" and went out to "a lot of people". ██████████ stated she looked at all the staff members the emails had been sent out to and didn't see the need for many of them to receive the emails nor why time was being spent doing such. In addition to receiving these emails, ██████████ stated Ms. Paz Dominguez held a staff meeting in mid-March with various members of each division being present except ██████████ and then proceeded to discuss her problems with ██████████. Specifically she recalled Ms. Paz Dominguez complaining that ██████████ "was not doing their jobs" and she "adamantly" told the staff present at the meeting they were "not going to be secretaries for ██████████ any longer". They were instructed by Ms. Paz Dominguez that this change was to be "abruptly" implemented. ██████████ stated she felt that Ms. Paz Dominguez had placed her "in the hot seat between ██████████ and her" because she was now expected to change procedures they had been doing for ██████████ without ██████████ being notified of such before hand. She expressed her feeling that Ms. Paz Dominguez had treated her and the other staff unfairly by putting this burden on them and Ms. Paz Dominguez should have notified ██████████ of the changes. She added that from the emails and the meeting she was able to tell that they (Ms. Paz Dominguez and ██████████) don't get along". ██████████ explained this had to do with the W2C forms and when employees came to the front counter to pick them up she would check their ID, walk back to ██████████ and get their W2C and then bring it back to the front counter. She stated this would typically take about five minutes time and she had no issues with doing it and never complained. ██████████ stated while doing this for ██████████ did take some time from her day she had still been able to get everything else done each day.



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██████████ stated since she first met Ms. Paz Dominguez in January she has not observed any real changes in her demeanor but acknowledged Ms. Paz Dominguez had been calling out sick a lot recently.

██████████ stated she believes the situation between Ms. Paz Dominguez and ██████████ could probably have been worked out if Ms. Paz Dominguez had not done what she did and rather had tried to communicate better and more directly with ██████████

Witness ██████████
██████████
██████████
██████████

██████████ has been employed by the County since December, ██████████ and had been working for the ██████████ division under ██████████ up until ██████████ when he switched to the ██████████ division under Karen Paz Dominguez. ██████████ He has known Ms. Paz Dominguez and ██████████ since he began his employment with the County. He has no relationship with either of them outside of work and has had no falling out with either of them.

██████████ stated he was never made aware of his essential duties and rather he was just to assist payroll with whatever they needed at the time. Most recently that had been to assist with the W2Cs. He has never previously been part of any work place investigation and has never filed a claim of work place stress/anxiety from any employer. ██████████ had no recollection of receiving any information regarding Humboldt County's anti-harassment or anti-discrimination policies. He has known Ms. Paz Dominguez and ██████████ since he began his employment with the County. He has no relationship with either of them outside of work and has had no falling out with either of them.

██████████ stated in the ██████████ division he had been kept "pretty busy" with all the work they had there. He stated there was never a time when he didn't have anything to do. ██████████ stated even while was still assigned to ██████████ they could have used additional help and the situation became more apparent within the last couple weeks after Ms. Paz Dominguez stopped letting staff from the other divisions help ██████████

██████████ stated immediately after Mr. Mellett took Ms. Paz Dominguez's authority over ██████████ away ██████████ asked him if he had received any type of threat from anyone in the other divisions and he replied that he hadn't. ██████████ then asked him to tell her if anyone does. Approximately three days later ██████████ was working in the ██████████ area when he was approached by ██████████ who asked him if he could help him with something in the accounting



division. ██████████ stated he could but when they walked over to the accounting side ██████████ ██████████ walked straight into Ms. Paz Dominguez's office where she was waiting to talk to him. He stated while ██████████ was still present Ms. Paz Dominguez, in "a pretty brief conversation" offered him a job in the ██████████ division. He stated in his perspective Ms. Paz Dominguez then threatened him by saying if he didn't come over to the ██████████ side she didn't see any reason to keep him employed with the County. ██████████ stated while Ms. Paz Dominguez didn't specifically say he'd be laid off, she implied such and he took it seriously. He stated it was his understanding at that time that Ms. Paz Dominguez had no right to say this to him as she was no longer his supervisor. This belief was reinforced when he informed ██████████ ██████████ of this threat as she had requested and she told him Ms. Paz Dominguez didn't have any say in where he can work or in his position in ██████████ ██████████ added that after Ms. Paz Dominguez threatened him and he left her office, ██████████ didn't have him assist him with anything so it became obvious to him Ms. Paz Dominguez had sent ██████████ to get him and ██████████ had only asked for help because other ██████████ staff were nearby.

██████████ stated when he informed his co-workers that Ms. Paz Dominguez had offered him a position in ██████████ he was warned that Ms. Paz Dominguez is "bossy" and "demanding" in her style of supervising. He stated he opted to transfer to the ██████████ division despite these warnings and what Ms. Paz Dominguez did so he can obtain the experience in ██████████

██████████ stated other than Ms. Paz Dominguez he has never felt threatened or intimidated by any staff member or supervisor. He did not know what the EAP was and had no knowledge of any staff member or supervisor seeking counseling due to work related issues.

██████████ stated other than the aforementioned time when he was called away from ██████████ by Ms. Paz Dominguez, no comment, language or action by any supervisor or co-workers has prevented or hindered him from performing his duties or affected his work performance.

██████████ stated he does not feel he has been treated any differently than his peers by any staff member or supervisor. He is also unaware of any co-worker feeling such.

██████████ stated he has not been harassed by any supervisor, co-worker or client. He stated the only possible harassment he was aware of at work was between Ms. Paz Dominguez and ██████████ ██████████ who "have been having issues between them recently". ██████████ stated he has personally not witnessed anything between them which he considers to be harassment except Ms. Paz Dominguez cutting assistance off to ██████████. Specifically, he stated upon Ms. Paz Dominguez no longer having authority over ██████████ she prevented the employees she did still have authority over further assisting ██████████

██████████ stated he was aware of Ms. Paz Dominguez having meetings within her office with staff and excluding anyone from ██████████ attending. He stated this action and other actions Ms. Paz Dominguez did "made it seem like she wasn't trying to work with ██████████". From his perspective, ██████████ believes Ms. Paz Dominguez needs to work on her ability to work together with the divisions.



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██████████ stated he had no knowledge of him or any co-workers being exposed to unwelcome or inappropriate comments, actions, conduct or language while at work. He stated he does not engage in the telling of off color jokes or stories and has not heard such from his peers or supervisors.

██████████ has not made any racist remarks or used racial slurs while at work nor has he heard such from any co-worker or supervisor.

██████████ has made no attempt to date or flirt with any staff member and is not aware of any co-worker or supervisor member doing such.

██████████ is not aware of any staff member receiving unjustified discipline, a demotion, failing to promote or given undesirable/unreasonable assignments.

Witness ██████████

██████████ has been an ██████████ working as ██████████ since mid-January, ██████████ Her immediate supervisor is Ms. Paz Dominguez. In Ms. Paz Dominguez's absence she has been instructed to take directives from ██████████

██████████ knew Ms. Paz Dominguez prior to her own employment with the County as she ██████████

██████████ She has only known ██████████ since she began her employment with the County in Mid-January, ██████████ has no relationship with ██████████ outside of work and she's never had a falling out with her.

██████████ indicated her essential duties as ██████████ are to learn skills related to accounting and auditing procedures in a government agency. Beyond that, she is provided with numerous varying tasks as they come up and she shadows the senior staff members.

██████████ stated she is not a protected class under ADA but ██████████ She stated the County was made aware of this limitation when she was hired and it has not been an issue except on ██████████

██████████ has never utilized the EAP or referred



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anybody to it. She has never filed a stress or anxiety claim with any employer but did previously file a sexual harassment claim with a prior employer. ██████████ stated the investigation found in her favor and although she did not suffer any retaliation she quit her job as they did not terminate the perpetrator's employment.

██████████ stated no co-worker or supervisor has ever threatened her in any manner nor has she ever felt threatened by anyone at work. She doesn't believe she has been treated any differently than her co-workers. ██████████ does not feel she has been harassed by any co-worker, supervisor or client. She stated she has never been prevented or hindered in performing her duties with the County by any employee's actions, comments or use of inappropriate language. ██████████ stated she has never engaged in telling any off color stories or jokes. She stated she and ██████████ did discuss ██████████ which made her feel uncomfortable ██████████ when she realized he had been present during some of the conversation.

██████████ has not made any racist remarks or used any racial slurs in the presence of her County co-workers or supervisors. She is not aware of any other employees doing such either. ██████████ has not flirted with or attempted to date any co-worker or supervisor at the County. She stated no County employee has flirted with her or attempted to date her nor is she aware of such actions taking place between anyone else in the Auditor Controller office. ██████████ stated the only Humboldt County anti-harassment and anti-discrimination information she has received came in the form of paperwork she received upon being hired.

██████████ has no knowledge of any County employee being disciplined without justification, being unfairly demoted or denied a promotion or being unfairly assigned to perform undesirable duties. She added however that both ██████████ and ██████████ have complained about having to still perform duties they thought they would no longer have to upon being promoted. ██████████ stated in her opinion this was due to a shortage of staffing and those duties were not given to them as part of any effort to demean them.

██████████ stated from the onset of her employment with the County she has kept a journal of everything she does and also takes documentation photographs when appropriate. She stated Ms. Paz Dominguez has utilized her in these respects to document interactions Ms. Paz Dominguez has had with the ██████████ staff in her journal. She was also asked to take photographs for Ms. Paz Dominguez when Ms. Paz Dominguez inspected the ██████████ area in an effort to get rid of equipment and furniture they were no longer using so more free space could be made. ██████████ stated when Ms. Paz Dominguez was told what equipment the ██████████ staff no longer needed and it didn't include the kitchenette so Ms. Paz Dominguez specifically asked the staff, "what about the kitchenette?" She stated the ██████████ then indicated she wasn't sure if the ██████████ staff wanted to get rid of the kitchenette and she wanted to discuss such with the other staff members first. Ms. Paz Dominguez then stated she wanted an answer within the next two hours and had ██████████ photograph the kitchenette for her. She stated she could tell from the way ██████████ and the other payroll staff were talking and from what they were saying that they really didn't want to get rid of the kitchenette. ██████████ recalled some of the ██████████ staff



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saying they liked having their coffee source close by instead of having to walk across the entire office each time they wanted a fresh cup as that was inconvenient when trying to get a lot of work done. She recalled Ms. Paz Dominguez then making a sarcastic remark, “you do know that it’s in the same office?” ██████████ stated underneath the kitchenette there was a power strip with a surge protector built in and three or four appliances were plugged into it. ██████████ recalled being told that the power strip surge protector had tripped on one or more occasions in the past and Ms. Paz Dominguez was concerned about how safe the set up was but admittedly didn’t really know what had caused the surge protector to trip. She stated once she and Ms. Paz Dominguez were back in Ms. Paz Dominguez’s office, Ms. Paz Dominguez stated to her, “I wonder what they are going to talk about (in regards to the kitchenette) that would make any difference in two hours”.

██████████ stated Ms. Paz Dominguez has personally told her she feels that ██████████ has been harassing her even though she’s ██████████ supervisor. She believes Ms. Paz Dominguez has told the other staff the same thing and became aware on her “first day of work” that the morale in the department was very low. ██████████ explained that several employees asked her why she would want to work in the Auditor Controller office as they all wanted to quit their jobs and were unhappy. She stated she was confused as to why everyone seemed so disgruntled until Ms. Paz Dominguez shared with her the issues going on.

██████████ stated Ms. Paz Dominguez coming to her to discuss what she believed was insubordination from the ██████████ staff did not seem like the “traditional approach” to dealing with such issues. She indicated it might have been better for Ms. Paz Dominguez to go to her own supervisor or other department heads and managers as her type of concerns would typically be discussed only with those above oneself. ██████████ stated she has observed five or six separate Facebook posts by Ms. Paz Dominguez which had to do with her frustrations with the ██████████ staff and/or Mr. Mellett. She also acknowledged that Ms. Paz Dominguez has since removed some of these posts from her Facebook for unknown reasons.

██████████ stated she was included in an email chain from Ms. Paz Dominguez to ██████████ regarding issues with the W2C’s. She stated although these issues did not pertain to her she read the emails so she could “get a broader scope of how the office is functioning and how the County as a whole functions”. Specifically, she stated Ms. Paz Dominguez would send her these types of emails and preface them with, “just FYI” so she realized the ██████████ staff were unaware she was receiving them.

██████████ stated after Ms. Paz Dominguez stopped allowing the front staff to assist ██████████ with issuing the W2C’s to employees she witnessed how disruptive the new process was to ██████████. She stated “at least fifteen” times a day one of the ██████████ staff had to stop what they were doing and come up to the front to assist an employee with getting their W2C. ██████████ recalled the ██████████ staff would sigh and grumble as they passed her desk to take care of each employee. She recalled it was mostly ██████████ and ██████████ who came forward. ██████████ stated she was not aware until she provided her statement to us that Ms. Paz Dominguez’s decision to no longer allow the front end staff to assist ██████████ coincided with Mr. Mellett taking her authority



over ██████████ away. She stated in retrospect, that “makes total more sense” as she couldn’t understand at that time why ██████████ staff “were working really hard just to save a few minutes of time” for the front end staff walking back and forth.

██████████ stated as part of her ██████████ she is supposed to learn as much as she can from all the divisions in the Auditor Controller office. She stated while Ms. Paz Dominguez has never told her she can’t help out or work in ██████████, she has also never asked her to see if ██████████ could use her assistance or assigned her even a small task to do in the ██████████ division. She added that even when there has been nothing obvious for her to do and she was asking “what can I do”, Ms. Paz Dominguez would assign her to just shadow an accounting or auditing employee rather than see if ██████████ needed anything. ██████████ stated when she has spoken to ██████████ she was very friendly to her and they don’t have any issues with one another.

██████████ stated the stress within the Auditor Controller office has noticeably increased in the last couple weeks. She stated ██████████ has specifically told her she has been much more stressed recently. Besides herself, ██████████ stated she is aware of ██████████ taking notes on what occurs within the Auditor Controller office.

Witness ██████████
██████████
██████████
██████████

NOTE: In her statement ██████████ made unfavorable comments regarding some payroll staff, prior employees of the Auditor Controller office and staff within other County departments. Although those comments could be argued to be relative to our investigation they were excluded from this report in an effort to keep the investigation focused on the accused and in the interest of completing the report as promptly as possible.

██████████ has been employed with the County for approximately ██████████ years and has been at her current position for just over ██████████. She’s been working in the accounting trade for approximately ██████████ years. Her immediate supervisor is Ms. Paz Dominguez.

██████████ first met Ms. Paz Dominguez ██████████ after Ms. Paz Dominguez was hired as ██████████. She has no relationship with Ms. Paz Dominguez outside of work other than texting to one another and she’s never had a falling out with her. She first met ██████████ approximately ██████████ years ago and has no relationship with her outside of work and does not send or receive texts from her. ██████████ has had no falling out with ██████████.

██████████ stated her most essential duties are to process and audit invoices in the system so the bills get paid on time. She stated she may qualify as a protected class under the ADA as she



has a [REDACTED] for which the County was made aware of and has made accommodations for her. [REDACTED] stated she does not believe she has been harassed or treated differently than her peers due to her disability. She has utilized the EAP in the past but it was not related to any person who is still employed by the County. [REDACTED] has not referred any other employee to the EAP.

[REDACTED] has never been a part of a work place investigation. She has never filed a stress or anxiety claim with any employer. [REDACTED] stated she was made aware of Humboldt County's anti-harassment and anti-discrimination policies when she was first hired.

[REDACTED] stated no co-worker or supervisor has threatened her in any manner nor has she felt threatened or intimidated by any current co-worker or supervisor. She has not been harassed by any co-worker, supervisor or client nor is she aware of any employee, other than Ms. Paz Dominguez who feels they have been harassed. [REDACTED] has admittedly engaged in telling off color jokes and stories using innuendos while at work but stated nobody ever indicated to her they were offended by such but staff members have on occasion immediately left the room. She stated to her knowledge almost every staff member in the Auditor Contoller office has engaged in telling similar stories or jokes. [REDACTED] stated occasionally one staff member will call out another staff member when telling off color jokes or stories and express their thoughts that such comments or language were forms of "ableism" and therefore unwelcome in the work setting. Additionally, [REDACTED] stated many staff members have engaged in conversations related to "pretty explicit female specific medical issues" including PCOS and admitted the staff should be more conscious of the fact there are also male employees present who might get "wiggled out" by such topics.

[REDACTED] stated she has not used racial slurs or made racist remarks in the presence of any County employees. She stated to her knowledge only one employee, [REDACTED], has used racial slurs or made racist comments at work and [REDACTED] stated she and [REDACTED] were both offended by such when it happened. [REDACTED] stated [REDACTED] informed [REDACTED] immediately that what she stated was offensive and to her knowledge [REDACTED] has not engaged in such behavior again.

[REDACTED] stated she has made no attempt to date or flirt with any other staff member and to her knowledge no staff member has done such to another staff member. She stated neither she nor anyone she is aware of at work received or been threatened with unjustified discipline, a demotion, a failure to promote or given undesirable assignments.

[REDACTED] stated it was her understanding from what Ms. Paz Dominguez told her, that Ms. Paz Dominguez's efforts to remove the kitchenette from the [REDACTED] staff was done to reduce the perception among the [REDACTED] and [REDACTED] staff that the [REDACTED] staff receive preferential treatment. She stated Ms. Paz Dominguez told her she had informed the [REDACTED] staff their kitchenette "was not needed because all of the appliances in the kitchenette (toaster, microwave & refrigerator) are already present on the other side of the office". [REDACTED] also acknowledged that when the surge protector for the appliances in the [REDACTED] area tripped it did



not affect any of the lights, computers or other electrical items outside of the payroll area. She added that even the computers in ██████████ were unaffected as they have a battery backup in case of power loss.

In another effort to reduce the perception of the ██████████ staff receiving preferential treatment ██████████ stated Ms. Paz Dominguez told her she informed the ██████████ staff they could no longer order erasable pens or highlighters. ██████████ stated Ms. Paz Dominguez's attempts to change the aforementioned perception through the noted means and through other means actually did not reduce the rift between ██████████ and the other divisions but rather caused an "escalation of tension". She stated as the tension was worsening Ms. Paz Dominguez would "vent" to her about the situation which kept her and other staff members being vented to involved in the matter. ██████████ stated Ms. Paz Dominguez's management style has allowed the staff to "give voices to the tensions and frustrations" that she believes already existed to some extent between ██████████ and the other divisions in the Auditor Controller office. She then acknowledged however that since Ms. Paz Dominguez started working for the County Ms. Paz Dominguez has, "in a lot of ways, made the situation worse because the tensions are now a lot more obvious". ██████████ stated from what Ms. Paz Dominguez has told her about the ██████████ staff she has lost her willingness to talk to the ██████████ staff and it has "really made me not want to answer any of their (██████████) questions".

██████████ stated she noticed when ██████████ was absent from the office for whatever reasons Ms. Paz Dominguez would sometimes go over to ██████████ and talk to ██████████ and the other ██████████ staff. She stated it was her perception that Ms. Paz Dominguez was making an attempt to manipulate the ██████████ staff "by going around" ██████████ in her absence "to get the answers that she wanted". ██████████ added that Ms. Paz Dominguez's actions in these regards, "was not helping the situation in any way".

██████████ stated a lot of frustration among the accounting and auditing staff was instigated towards the ██████████ division when Ms. Paz Dominguez informed them ██████████ knew about the problems with the 2017 W2's for a week and had made no effort to fix the situation until Ms. Paz Dominguez "put her foot down". She recalled Ms. Paz Dominguez telling them, "Karen wasn't going to do anything about it until she got on her about it".

██████████ stated in the name of "transparency" Ms. Paz Dominguez has held "impromptu" meetings with just the accounting and auditing staff to discuss issues she was having with ██████████ and/or Mr. Mellett. She stated she and most of the other staff, "hate meetings" and think "meetings suck" but they also understand some issues are better handled through meetings. ██████████ stated Ms. Paz Dominguez held an urgent impromptu meeting with just the auditing and accounting staff right after Mr. Mellett relieved her of her authority over the ██████████ division. In that meeting Ms. Paz Dominguez was obviously and openly frustrated and announced that they were no longer going to assist the ██████████ staff with their duties or take messages for them.

██████████ stated she never witnessed nor was she ever made aware of any act of harassment, improper work conduct or offensive comments/language in the Auditor Controller office taking



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place in the presence of anyone from HR or any other department heads.

██████████ stated she was aware of Ms. Paz Dominguez going into the ██████████ area after closing and taking photographs of documents containing confidential information which had been left out by the staff. She stated this made employee's information such as their social security numbers and wage garnishments vulnerable for theft by the janitorial and custodian crews. ██████████ stated Ms. Paz Dominguez told her she took these photographs to document her belief the ██████████ staff "don't actually respect employee's privacy".

Witness ██████████
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██████████ has been employed by the County of Humboldt for approximately ██████████ and has been at her current position for the last ██████████ years. Her immediate supervisor is Ms. Paz Dominguez. ██████████ stated in the absence of Mr. Mellett of Ms. Paz Dominguez she "unofficially" takes on the roll of supervisor over ██████████ due to her seniority. She stated in the last couple months, due to an increased amount of absences by both Mr. Mellett and Ms. Paz Dominguez, she's had to make between six and ten important decisions she typically wouldn't have had to concern herself with.

██████████ has known Ms. Paz Dominguez since Ms. Paz Dominguez began her employment with the County. She has engaged in some social interactions with her outside of work and they are Facebook friends with one another. She stated they've never had a falling out. ██████████ has known ██████████ for approximately ██████████ years. She acknowledged she has also been socially active with ██████████ outside of work and they consider each other to be good friends. She's never had a falling out with Ms. Paz Dominguez or ██████████

Without stating what her disability is, ██████████ indicated her belief that she is a protected class under ADA and the County is aware of such and has accommodated her accordingly. She does not believe she has been treated differently than her peers or harassed in any manner as a result of her disability. ██████████ has not utilized the EAP and ██████████

██████████ She added she had never undergone any ██████████ until she began working in the Auditor Controller office. ██████████ has not referred any employee to the EAP ██████████ and isn't aware of any other employees seeking mental health counseling other than possibly ██████████ whom she talked to about such approximately one year ago.

██████████ stated she considers her most essential duty to be the maintenance of the ██████████ roll for ██████████



██████████ has twice previously participated in work place investigations wherein she was the victim. She indicated she never filed a grievance but rather when she was interviewed as a witness she came forward to say she was also a victim. ██████████ has never filed a stress or anxiety claim against any employer.

Other than Mr. Mellett, ██████████ has not been threatened by or felt intimidated by any current supervisor, co-worker or client. She stated other than from Mr. Mellett, she has not been harassed by any co-worker, supervisor or client. Other than Ms. Paz Dominguez, ██████████ stated the only employees she is aware of being “harassed” are the male employees and mostly ██████████. ██████████ stated she isn’t even sure ██████████ or the other males takes offense to the comments being made as they are actually compliments about their physical appearance or attire. She stated her belief is that commenting on certain people’s appearance or attire is not appropriate for the work place as not everyone is receiving such comments. She stated it is only the rank and file who make such comments and she’s not heard any supervisor engaging in such.

██████████ stated the only employee she is aware of who has openly made derogatory comments about people’s sexual preference or sexual identify is ██████████. She stated she has twice spoken to ██████████ about her hostile comments towards homosexuals and asked her not to make such comments in her presence while at work. She stated although ██████████ apologized both times, it did not stop ██████████ from making such comments so she brought it to the attention of Mr. Mellett and Ms. Paz Dominguez. ██████████ indicated her speaking to the supervisors seems to have taken care of the issue as she hasn’t heard ██████████ make any such comments in approximately seven months. Although ██████████ didn’t indicate what her sexual preference or identify was during her statement, she stated she took offense to ██████████ comments as she has many friends who are part of the LGBTQ community and she is an advocate for their rights.

██████████ admitted she has engaged in telling off color jokes or stories and indicated her preference of such is morbid humor. She stated nobody has complained to her about such. ██████████ denied making any racial slurs or saying racist comments while at work. She stated she is unaware of any current employees or supervisors doing such either.

██████████ has made no attempt to flirt with or date any co-workers or supervisors. She is not aware of any co-workers or supervisors flirting with or dating anybody else in the office. ██████████ stated other than Mr. Mellett, no employee or supervisor has engaged her in unwelcome conduct nor is she aware of anyone else in the office claiming a co-worker or supervisor had engaged them in unwelcome conduct.

██████████ stated other than Mr. Mellett not promoting her and giving her unreasonable assignments, she is not aware of any County employee receiving unjustified discipline, being demoted, failing to promote or being given undesirable/unreasonable assignments. She stated her assignments are unreasonable because they cannot possibly be accomplished in the amount



of time she is provided.

██████████ stated she has had several disagreements with Ms. Paz Dominguez and attributes their problems to Ms. Paz Dominguez struggling with communication and still being on a learning curve when it comes to management skills and dealing with government bureaucracy. She stated Ms. Paz Dominguez’s verbal communication skills “were terrible” when she first started working for the County so many of her subordinates requested she put things in writing so her messages were clear. Unfortunately, Ms. Paz Dominguez also had difficulty composing emails and many times her intent was misunderstood. ██████████ also stated Ms. Paz Dominguez would often cc most if not all of the staff on her emails to ██████████. She stated she didn’t understand why Ms. Paz Dominguez was including the staff on emails that didn’t concern them other than Ms. Paz Dominguez saying she’s trying to be transparent. ██████████ stated she’s not sure how to handle Ms. Paz Dominguez continuing to cc everyone with emails and it’s become “kind of a big mess”. She stated many of the staff have complained to her about receiving the emails from Ms. Paz Dominguez and she knows it’s causing the Auditor Controller divisions to “not get along with one another in a professional manner”. ██████████ acknowledged that while there was some tension between ██████████ and the other divisions before Ms. Paz Dominguez came to work for the County, Ms. Paz Dominguez has made the tension much worse.

Witness ██████████
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██████████ has been employed by the County of Humboldt for approximately ██████████ years and has been at his current position for approximately ██████████. His immediate supervisor is Ms. Paz Dominguez. ██████████ has known Ms. Paz Dominguez since she began her employment with the County. He considers her to be a friend and stated they discuss personal issues with one another in person, by telephone and via text. ██████████ has known ██████████ for approximately ten years and is friends with her on Facebook. He has no relationship with her outside of work and does not confide in her with his personal issues. ██████████ has not had a falling out with Ms. Paz Dominguez or ██████████.

██████████ indicated his essential duties are to be the liaison between ██████████ and Ms. Paz Dominguez and to assist ██████████ as needed. He stated he is not a protected class under ADA. He has never utilized the EAP nor referred it to any other employee. ██████████ has never filed a stress or anxiety claim against any employer. He is aware of Humboldt County’s anti-harassment and anti-discrimination policies and participated in a refresher course on the subjects last October.

██████████ stated no co-worker or supervisor has ever threatened him in any manner. He stated he does feel he has been treated differently than his peers by some of his co-workers. ██████████



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stated he is held to a different standard when performing his duties and not given as much leeway as his peers. ██████████ attributes this situation to him being a male in an almost exclusively female work place. He stated he isn't sure whether his peers who are treating him differently are doing so because they respect him more and therefore expect more out of him or because they don't like him because he's male. ██████████ stated their motivations have not been made clear and it is just apparent there is a double standard for him with these employees. In addition to him being treated differently, he stated the conversations around him while at work have many times become anti-male where employees will say things like, "men are so stupid" or "men are chauvinists". ██████████ stated this environment has affected his work performance as it lowers his morale and his feelings of being accepted by his co-workers as equals. He stated the fact that he is excluded from any social activities his co-workers plan for outside of work further strengthens his feeling of being an outsider.

██████████ stated for quite some time now there has been a perceived divide between ██████████ and the other divisions within the Auditor Controller office. He stated when Ms. Paz Dominguez was hired she began openly talking to the ██████████ divisions about problems she was having with ██████████ which put everyone's focus on this "divide". ██████████ stated even though he has no power over ██████████ Ms. Paz Dominguez would ask him when making her decisions affecting ██████████ things like, "do you think I'm going too far" or "do you think I'm wrong to do this" or "am I being too harsh on them"? ██████████ admitted he felt complimented by Ms. Paz Dominguez confiding in him and asking for his input but also acknowledged in her doing so it made him somewhat of an ally to her cause. He stated in retrospect he is shocked at how badly the situation between Ms. Paz Dominguez and ██████████ became and he never really thought about how it had become so bad so quickly. ██████████ stated because Ms. Paz Dominguez's approach created a hostile work environment for many employees, in retrospect he would not have allowed Ms. Paz Dominguez to vent to him. He stated he would have told Ms. Paz Dominguez, "I'm not the right person to talk to about this problem as it may give the impression you are trying to form up sides".

██████████ stated he was one of the ██████████ division employees who regularly used the ██████████ kitchenette to get his coffee, both because it was closer and because they had a better coffee machine. He stated when it became known that Ms. Paz Dominguez wanted to take away ██████████ kitchenette, Ms. Paz Dominguez told him ██████████ had stated there were other employees besides ██████████ using the kitchenette and asked him why he was continuing to use their kitchenette. ██████████ admitted neither ██████████ nor Ms. Paz Dominguez specifically told him he could no longer use ██████████ kitchenette but it was clear to him either ██████████ or Ms. Paz Dominguez didn't want him to continue with such so he stopped using ██████████ kitchenette. He stated in retrospect he believes Ms. Paz Dominguez chose her words so as to make him think ██████████ no longer wanted him to use their kitchenette when in reality ██████████ was trying to keep their kitchenette by saying everybody is welcome to use it and some ██████████ employees already are.

██████████ acknowledged he developed a pretty close relationship with Ms. Paz Dominguez in a relatively short amount of time compared to how close he's gotten to other co-workers and



supervisors. He attributed this to Ms. Paz Dominguez recognizing his potential and taking his ideas and feedback seriously where others have not. ██████████ stated Ms. Paz Dominguez has made him feel “very vindicated” and she has acknowledged to him that he had been previously treated “very unfairly” by the Auditor Controller office. He stated before Ms. Paz Dominguez came along he had felt “stepped on for years”, was “just being paid lip service” and sometimes felt “invisible”. ██████████ stated Ms. Paz Dominguez made him feel like they had a lot in common, they were on the same wave length and were true friends.

██████████ stated he has never engaged in telling off color stories or jokes at work. He stated some of his co-workers do engage in telling off color stories and jokes which have made him feel uncomfortable due to the topic being female oriented and him being the only male. ██████████ stated just today some of the female employees were discussing men raping women which made him feel odd. He stated he has not used racial slurs or made racist comments while at work nor is he aware of anyone other employees doing such. ██████████ was told by ██████████ she took offense to him using the term, “lame” so he has refrained from using such since she told him this.

██████████ stated he has never made any attempt to date or flirt with any co-worker or supervisor nor is he aware of anyone trying to date or flirt with him or anybody else in the office. Other than what has already previously been noted, ██████████ is not aware of anyone in the office engaging in unwelcome conduct towards him nor has he been made aware he is engaging in unwelcome conduct.

██████████ stated under the current supervisors, he is not aware of any employee excluding himself who has received unjustified discipline, has been demoted, failed to promote or was given undesirable assignments. He stated he failed to promote due to Mr.Mellett.

██████████ stated the only person who has engaged in actions or made comments which affected his ability to perform his work or affected his job performance has been Ms. Paz Dominguez. He stated through her use of “urgent staff meetings”, which in realty were neither urgent nor did they need to be heard by everyone in the office, she has made him stop his work production and affected his overall performance for the day. The last such meeting she held involved ██████████ reading a long drawn out email chain from ██████████ of the CAO during which ██████████ was forced to apologize. ██████████ saw no reason this had to be addressed when it was nor for everyone to stop what they were doing to attend. As he recalls he was in the middle of a phone call and had to end his conversation abruptly to come to the meeting.

██████████ stated he is friends with Ms. Paz Dominguez on Facebook and was aware Ms. Paz Dominguez put posts up which were negative and aimed at ██████████ staff. He stated Ms. Paz Dominguez kept the posts “pretty vague” but anyone who worked for the Auditor Controller office knew what and whom Ms. Paz Dominguez was referring to. ██████████ believes such posts by Ms. Paz Dominguez could have been considered harassment by the ██████████ staff.



Witness ██████████
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██████████ has been employed by the County for ██████████ and has been at her current position the entire time. She took the job with the County upon moving to Humboldt County from ██████████. ██████████ direct supervisor is Ms. Paz Dominguez. ██████████ has known Ms. Paz Dominguez since she became the Assistant Auditor-Controller and has known ██████████ since she began her own employment with the County. She has no relationship with either ██████████ or Ms. Paz Dominguez outside of work and has never had a falling out with either of them. ██████████ did admit she had recently become friends with Ms. Paz Dominguez on Facebook and that they have been texting one another to communicate for several months.

██████████ considers her most essential duties to be assisting with accounts payable claims by getting them into the software system. She stated she is not a protected class under ADA and she has never been a part of any work place investigation. ██████████ has never previously filed a work related stress or anxiety claim. She was made aware of Humboldt County's anti-harassment and anti-discrimination policies when she first began her employment.

██████████ expressed from the onset of her statement her belief that the investigation into the allegations of a hostile work environment was actually a form of harassment towards her and was creating a hostile work environment where one didn't exist previously. Specifically, she stated she "wasn't aware of anything going on" which would constitute a hostile work environment.

██████████ stated she has not been prevented or hindered in performing her duties by any employee's, supervisor's or client's actions, comments or language. She has also not had her job performance level affected by any of these means.

██████████ stated she has never been threatened by any co-worker or supervisor nor has she ever felt intimidated by any co-worker or supervisor. She does not feel she has been harassed by any supervisor or co-worker and was aware of only one employee sharing their thoughts they had been harassed. ██████████ didn't want to reveal this person's name as she thought it was only hearsay. When it was explained to ██████████ that an employee confiding in her that they believe they were harassed brings some credence to their allegation in an investigation she stated she didn't remember who told her.

██████████ stated within the last two weeks she has received cc emails from Ms. Paz Dominguez which revealed to her for the first time that Ms. Paz Dominguez was having conflicts with ██████████ staff. She stated the email pertained to a conversation between Mr. Mellett, ██████████ and Ms. Paz Dominguez. ██████████ felt Ms. Paz Dominguez conflict with the other two was "petty" and she didn't believe there was any reason for her to receive such an



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email. She stated she looked at who received the email sent from Ms. Paz Dominguez and noted it was sent to everyone in their office.

She was unaware of the EAP and had no knowledge of any employee seeking counseling due to work related issues.

██████████ doesn't believe she has been treated differently than her peers by any supervisor or co-worker. She is not aware of any co-workers who feel they have been treated differently than their peers.

██████████ had no knowledge of any employee believing another employee's actions, comments or language was inappropriate for the work place or unwelcome. She stated she does not engage in telling any off color stories or jokes and has no knowledge of her co-workers or supervisors doing such.

██████████ stated she has not used racial slurs or made racist comments at work and is not aware of any co-workers or supervisors doing such.

██████████ has no knowledge of any employee being threatened with or receiving unjustified discipline, a demotion, failing to promote or undesirable assignments.

██████████ stated up until recently she had respect for and good thoughts about Ms. Paz Dominguez. She indicated her belief that Ms. Paz Dominguez has lately not been acting professionally or well behaved and has not been meeting her expectations of how a supervisor should be.

Witness ██████████
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██████████ has been the Auditor/Controller for Humboldt County the last ██████████ years and ██████████ months. Previously he was an accountant for 20 years working for various entities.

██████████ has known ██████████ for approximately ██████████ years and doesn't typically interact with her other than to say hello. He stated the majority of the time he only interacts with her if there are issues with ██████████ which need to be resolved but for the most part ██████████ runs itself pretty independently.

██████████ had no knowledge of any of his subordinates telling off color stories or jokes, making any racist remarks, using any racial slurs or making any attempts to date or flirt with their subordinates, peers or supervisors.



██████████ stated he does have knowledge of three ██████████ employees, ██████████ who have expressed to him their belief that Ms. Paz Dominguez had engaged them repeatedly in unwelcome conduct and thus caused a hostile work environment. He was told by these three employees that Ms. Paz Dominguez comes to the ██████████ department and bosses them around in an “unpleasant and arrogant” manner and reacts in a “very volatile” way when spoken to by them. ██████████ stated these employees wrote out a two page complaint against Ms. Paz Dominguez and presented it to him approximately two week ago. They told him that another ██████████ employee, ██████████ feels the same way as they do but doesn’t want to get involved in a complaint process. ██████████ stated he advised the three employees to take their complaint to HR which they did. He stated to prevent the situation from getting worse, he informed the three ██████████ employees that he would tell Ms. Paz Dominguez to no longer communicate directly with ██████████ and rather to go through him. ██████████ stated when he informed Ms. Paz Dominguez of his decision she became immediately angry and curt with him and then handed him her own prepared written complaint against the ██████████ staff as though she had been expecting such. He stated he looked over Ms. Paz Dominguez’s list and found only one item to be actionable and that was the ██████████ staff having an Amazon Alexa machine in their department. ██████████ stated he addressed this with ██████████ who agreed it was not proper equipment for their department and got rid of the machine. He stated Ms. Paz Dominguez’s other complaints against ██████████ were not serious and just common issues related to how she wanted ██████████ to perform their job duties.

On Thursday, March 15, 2018 ██████████ stated he had a conversation with Ms. Paz Dominguez after he learned she had still been communicating directly with members of ██████████ after being told not to. He stated he told her she was being insubordinate in her actions and if he wasn’t going to be ██████████ he would have written her up for insubordination. He stated Ms. Paz Dominguez then called in sick the next day, Friday, March 16, 2018 but that same afternoon she filed a sexual harassment claim against him.

During the couple weeks prior to the ██████████ staff and Ms. Paz Dominguez filing grievances against each other, ██████████ stated there was a “flurry of emails going back and forth” between them which further increased the tension.

██████████ stated one of his Senior Account employees, ██████████ quit working for the Auditor / Controller department after approximately two weeks solely because she couldn’t get along with Ms. Paz Dominguez. He stated ██████████ currently works for the County ██████████ but is out on ██████████ due to ██████████.

██████████ stated he doesn’t know how Ms. Paz Dominguez’s other subordinates besides those in ██████████ feel about her but believes some of them are her allies as she either hired or promoted several of them herself. He indicated Ms. Paz Dominguez hired ██████████ ██████████.

Accused – Karen Paz Dominguez:



██████████

Ms. Paz Dominguez was hired as the Assistant Auditor Controller for Humboldt County on July 31, 2017. Prior to working for the County she was an enrolled agent and senior staff accountant at a CPA firm known as Martin, Hutchison and Hohman in Eureka.

Ms. Paz Dominguez has known ██████████ and all the other staff in ██████████ since she began her employment with the County in 2017. She stated she has no relationship with ██████████ outside of work and has never had a falling out with her. Ms. Paz Dominguez stated she has not developed a personal relationship with any of her subordinates. She further stated any text communication she has done with her subordinates has always been work related. Upon further questioning Ms. Paz Dominguez regarding her relationships with her subordinates she corrected her previous remark and stated she has gone out to lunch and gone to the movies with ██████████ during work hours and she and her husband did go out to dinner with ██████████ and her husband. She stated she was invited to go out after work with ██████████ staff but she declined the offer.

Ms. Paz Dominguez has never previously played any role in a work place investigation. She has never previously filed a stress or anxiety claim with any employer. She acknowledged she received training on Humboldt County's anti-harassment and anti-discrimination policies.

Ms. Paz Dominguez stated she had been told on March 22nd by ██████████ that ██████████ had filed a complaint against her but would not tell her what the complaint was about and rather told her the investigator would inform her. She then approached ██████████ who told her the same thing. Ms. Paz Dominguez stated it was during our interview with her that she was first informed ██████████ had accused her of making a "hostile work environment" (NOTE: Ms. Paz Dominguez statement is obviously false as two of her staff members allowed us two days prior to meeting with Ms. Paz Dominguez to photograph texts they had received days prior to that from Ms. Paz Dominguez which specifically state she was being accused of creating a hostile work environment – See "Supporting Documents / Digital Evidence"). Ms. Paz Dominguez became obviously emotional and stated she was blindsided by the allegations being made against her as nobody had previously pointed out to her she had done anything wrong and she doesn't see what she's done wrong. She stated she feels like she's being set up to fail because of the allegations against her". Ms. Paz Dominguez then added, "if I've done something to harm the staff then I need to be held accountable."

Ms. Paz Dominguez stated her authority over the ██████████ division "was not in any official capacity revoked" and it is still in her job description. She stated she interpreted ██████████ directive given to her on Tuesday, March 20 as "being more of a request" and quoted ██████████ as saying, "I need you to stay away from ██████████ for the next 3½ months". Ms. Paz Dominguez stated she received nothing in writing and was not provided with a reason why other than being



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told [REDACTED] was pissed off at her and had filed a complaint against her. He also shared that [REDACTED] had threatened to quit her job if he allowed the situation to remain unchanged. She admitted that she understood from [REDACTED] words she was not to have anything to do with payroll for 3½ months and she acknowledged such to HR at that time. Ms. Paz Dominguez further interpreted [REDACTED] directive as meaning she was not supposed to go over to [REDACTED] she was not supposed to have anything to do with [REDACTED] and she was not supposed to contact [REDACTED]

Ms. Paz Dominguez stated the last time she had interacted with [REDACTED] prior to March 20 was on Thursday, March 15 and that she called out sick on the 16th and 19th. She stated since receiving the directive to stay away from [REDACTED] on the morning of March 20 she has not communicated with [REDACTED]. When asked if she had communicated with anyone in [REDACTED] Ms. Paz Dominguez responded, “not one on one” and acknowledged she did send one email to [REDACTED] regarding a claim she had submitted.

Ms. Paz Dominguez admitted when she was asked by two employees what [REDACTED] had gotten upset about when he wanted the vendors paid who are provide housing to convicted drug addicts and prostitutes on probation, she replied, “I have no idea, I didn’t know we were paying for hookers”.

Ms. Paz Dominguez indicated it was suggested to her by [REDACTED] might have filed a complaint against her partially due to her no longer being able to get what she wants by having her low cut shirt unbuttoned, wearing high heels and whispering into the ear of Ms. Paz Dominguez’s predecessor, [REDACTED]. Supporting this possibility, Ms. Paz Dominguez stated when she was first hired and walked into the Auditor Controller office “it was a lawless place, people coming and going as they pleased, doing whatever they wanted. There was no oversight, no kind of control, there was nothing”. She stated she then set out to bring order to the chaos and just a couple weeks before [REDACTED] filed their complaint against her she had told the entire [REDACTED] staff they were going to have to start having work schedules and that didn’t go over very well at all. Ms. Paz Dominguez stated they argued they are management/confidential so they can flex their hours and make their own schedules. She stated she told the [REDACTED] staff that was not true, they still need to work scheduled hours and being management/confidential allows them to work extra hours to get jobs completed by deadlines. She then told them she was going to expect [REDACTED] to be in the office by 8 am, be ready for the public by 8:30 am and remain open until 5 pm, none of which they wanted to hear. Ms. Paz Dominguez stated when she left [REDACTED] the staff there were so visibly upset [REDACTED] asked that she not address the staff directly in the future and rather tell her so she can tell the staff in her own manner. She stated she didn’t agree with [REDACTED] and told her she was going to draft schedules for [REDACTED] and come back before the entire staff to show them and discuss the matter. Ms. Paz Dominguez stated this upset [REDACTED] and she left it at that and walked away.

Ms. Paz Dominguez stated the [REDACTED] staff became angry with her when she instructed them to dismantle their kitchenette because it had apparently blown a fuse and building maintenance came by to let them know what had happened, “as we had no idea”. She stated it was building



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maintenance that instructed her to remove the kitchenette for safety reasons. When Ms. Paz Dominguez did this the ██████████ staff argued with her and gave several reasons why they wanted their own break area and not share in a centralized break area.

In a complete contradiction to Ms. Dominguez’s statement that the ██████████ staff argued with her about having to start being on a schedule and about the removal of their kitchenette, near the end of Ms. Paz Dominguez’s statement she stated, “I didn’t get any push back (from ██████████), none, I did not get any push back”. Then shortly thereafter Ms. Paz Dominguez stated, “there was no push back (by ██████████ that says we don’t want to do that or we don’t think that’s fair, nothing like that” and “as far me getting any push back for something I implemented or something I suggested, there was none”.

Ms. Paz Dominguez admitted she took photographs one evening in ██████████ after everybody had left “because she was curious as to what they may have left out”. She explained she had already instructed ██████████ to “lock everything up when they leave” and “to cover things up on their desks”. Ms. Paz Dominguez stated when she went into ██████████ she found that on every desk, counter and table there were documents with confidential information open so anybody coming into ██████████ could see information about employees. She stated she used her telephone to take the photographs and then emailed them to herself so she’d have access to them on her work computer. Ms. Paz Dominguez stated she then prepared a report outlining ██████████ issues for HR which included the photographs. She stated upon Ms. Dematteo seeing the photographs and learning Ms. Paz Dominguez had used her personal telephone to take them Ms. Dematteo told Ms. Paz Dominguez to delete the photographs from her telephone.

Ms. Paz Dominguez stated she has never engaged in the telling of off color jokes or stories at work. She stated the only staff she has been informed of who have engaged in such are the employees in ██████████ Ms. Paz Dominguez stated one of her staff complained that the ██████████ staff were loudly referring to men as “beefcakes” and she told ██████████ to stop making such comments.

Regarding the allegations against her of posting work place complaints on her Facebook Ms. Paz Dominguez admitted she did such and that they were not deleted but rather still remain on her Facebook. She admitted to de-friending ██████████ because they had filed a complaint against her. Ms. Paz Dominguez admitted some of the posts she has made were available for the public to see while others were limited to just her friends or friends of friends. She stated she never named anybody specifically in her posts but she did specify departments she had issues with. Some of the posts she admitted to putting upon her Facebook include; “stay away from the CAO, be careful who you trust, watch your back”, “I’m working for the public not the mob”, “my boss called me hormonal today” and “don’t stir the pot, if you don’t stir the pot the bottom gets burned and we are the bottom”. Ms. Paz Dominguez also admitted to using her Facebook for campaign election related purposes and has taken advice from her campaign manager as to what posts to make public. Ms. Paz Dominguez also admitted she had a conversation with ██████████ during which she told ██████████, “I’m not going



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to lose the election because you are not communicating with me and because you are not doing what you're supposed to be doing”.

Ms. Paz Dominguez was told of the allegation that after she had been told to stay away from ██████████ she had used ██████████ to get ██████████ to come to her office and then threatened ██████████ position if he didn't agree to switch to another division from ██████████ Ms. Paz Dominguez's very first comment after hearing this was, “whoa, yeah, I can see how they got there”. She then explained ██████████ had been hired to work on the auditor side but because ██████████ needed the extra help she let ██████████ work in ██████████ Ms. Paz Dominguez stated that ██████████ was supposed to be temporary but ██████████ “never let him go”. She stated when ██████████ came into her office she was thinking ██████████ is not a management/confidential employee yet he is performing duties which are exposing him to County employee confidential information. Ms. Paz Dominguez admitted when ██████████ came into her office she told him she could advocate for extending his ██████████ if he started doing ██████████ work but if he continued doing what he was doing in ██████████ she could not justify extending his ██████████ During Ms. Paz Dominguez aforementioned explanation she added, “I didn't know why, what ██████████ needed help with from ██████████ When Ms. Paz Dominguez was asked if she instructed ██████████ to go get ██████████ from payroll and bring him to her office she stated, “uh (long pause), I told him I need to talk to ██████████ I don't know how I'm going to talk to ██████████ if I'm not allowed to go over there (██████████) She then added that she didn't know which phone number she could call to go directly to ██████████ In somewhat of a contradiction to her earlier statement regarding ██████████ needing help from ██████████ Ms. Paz Dominguez stated ██████████ offered, “well I got to talk to him, I can tell him to come over”. (Ms. Paz Dominguez first stating ██████████ needed help from ██████████ matches ██████████ account that ██████████ told him he needed his help and instead walked him directly to Ms. Paz Dominguez's office. Even more significant was that ██████████ never actually asked ██████████ to assist him with anything once ██████████ left Ms. Paz Dominguez's office).

Ms. Paz Dominguez was informed of the allegations from many Auditor Controller staff that she had created a hostile work environment by causing a falling-out between ██████████ and the other divisions through her repeated complaining to all her ██████████ subordinates of problems she was experiencing with ██████████ and Mr. Mellett. She was also informed of how insolence is improper in the work place and can break down morale. Ms. Paz Dominguez stated she had never heard of the word insolence and was unaware of it being improper conduct. She also responded that she can understand how what she did in those regards created resentment and frustration among her subordinates. Ms. Paz Dominguez acknowledged for example that when she'd have a meeting with Mr. Mellett her subordinates would come into her office afterwards so she could share with them what he told her. She was later asked, “in retrospect, do you believe that you shared anything with the ones you were confiding with, your employees, that you shouldn't have?” Ms. Paz Dominguez responded, “probably everything”. After several moments of silence, she added, “if I'm not including everyone in a conversation then I'm not really promoting transparency”. She then admitted she had engaged her subordinates in the non-██████████ divisions about issues they were having with ██████████ and the issues she was having with ██████████



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In regards to ██████████ and ██████████ allegations during their second statements that Ms. Paz Dominguez complained to the media about mistakes and errors which had already been dealt with, in a bit of irony Ms. Paz Dominguez stated she couldn't believe the ██████████ staff were still bringing up the issue of her not allowing some staff to have any pizza because they didn't help move. She stated she had already reached out to ██████████ and told her, "I hope you know that I was just joking, of course you could have had pizza". She added, "for them ██████████ to bring that up again, it's like oh, come on, now you're reaching".

Ms. Paz Dominguez was informed by ██████████ that one her ██████████ staff, ██████████ ██████████ had engaged in making sexually related remarks to ██████████. She stated ██████████ spoke up to tell them to stop and ██████████ responded, "I've known ██████████ for a long time, we get along just fine and he know's I'm just kidding". Ms. Paz Dominguez stated she spoke to ██████████ about the situation and ██████████ told her he can understand how their conversation could have sounded "wrong" but he didn't think she needed to be further concerned about it.

Ms. Paz Dominguez stated she had never made racist remarks or used racial slurs at work and she was not aware of any County employee doing such.

Ms. Paz Dominguez has made no attempts to flirt with or date any County employees and no County employees have done such to her. She has never been made aware of any employee being rebuffed by another employees advances.

Ms. Paz Dominguez stated ██████████ staff comments and conduct have interfered with her ability to perform her duties. She stated ██████████ had developed a pattern of withholding information from herself and Mr. Mellett. Ms. Paz Dominguez stated the first instance of this was when the internet went down and ██████████ staff was not going to be able to do ██████████. She stated she contacted ██████████ as ██████████ was not available and ██████████ told her they didn't know what they were going to do. Ms. Paz Dominguez then took it upon herself to try and find a solution so she went to the CAO to discuss possible options. When they came up with a possible solution Ms. Paz Dominguez got back in touch with ██████████ who told her ██████████ had come up with a solution and it was already taken care of. She stated nobody bothered to notify her it had been taken care of and she had wasted an hour of her time. Ms. Paz Dominguez stated the next failure to communicate was in regards to the incorrect W2's going out. She stated she had to find out from employees who had received them and a news story that there was a problem and ██████████ had not informed her or Mr. Mellett of the issue. Another recent failure to communicate was in regards to a subpoena ██████████ had received and didn't inform her or Mr. Mellett of such. She stated her and Mr. Mellett didn't learn of it until County Counsel got involved for their departments failure to comply with a subpoena. When she investigated it she learned ██████████ was aware of receiving the subpoena but hadn't yet gotten around to complying with it. Finally, the most recent failure to communicate was when ██████████ mistakenly sent the entire W2 file for the County to one employee's G Mail account while that employee was out on ██████████. She stated she didn't find out about it until the CAO sent her and Mr.



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Mellett an email about what had occurred. Ms. Paz Dominguez stated Mr. Mellett learned ██████████ ██████████ had already become aware of what happened and thought she had it under control as she was planning on contacting Google to ask them to delete the email that had been sent. Ms. Paz Dominguez stated all of those incidents prevented her from working upon her duties as she had to field calls from department heads, concerned employees and the press.

Ms. Paz Dominguez stated the timing of ██████████ filing their complaint against her coincides directly with one of the most forceful conversations she's had with ██████████. She stated ██████████ was defending her department's repeated failure to reveal problem to her because ██████████ wanted time to fix problems themselves if they could or at the very least collect as much information about the problem before involving her or Mr. Mellett. Ms. Paz Dominguez stated she forcefully told ██████████, "No, at the first sign of someone's confidential information being compromised, that is when you talk to me and together we come up with a solution. You don't leave us in the dark until it's convenient for you to tell us what happened".

Supporting Documents / Digital Evidence:

During the investigation each person interviewed was asked if they had knowledge of any physical evidence in existence which either supported or documented their statements. We also asked for such documentation in digital form, be it texts, emails or social media posts.

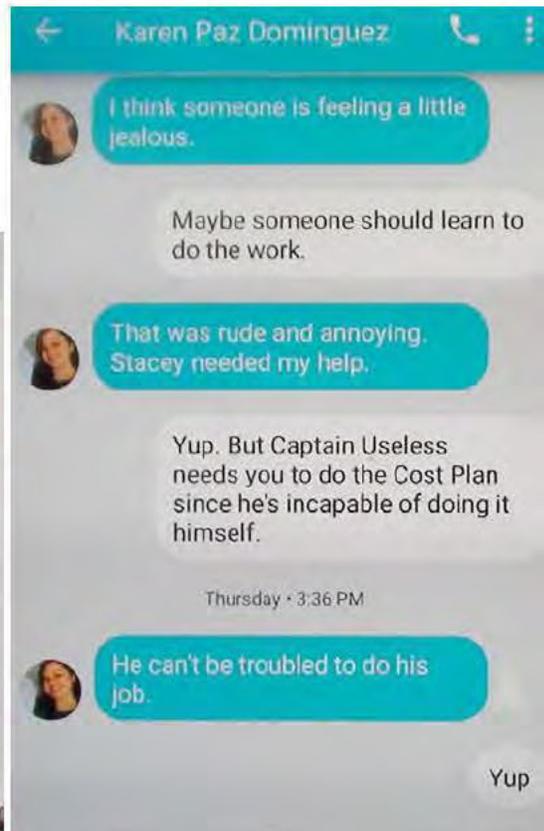
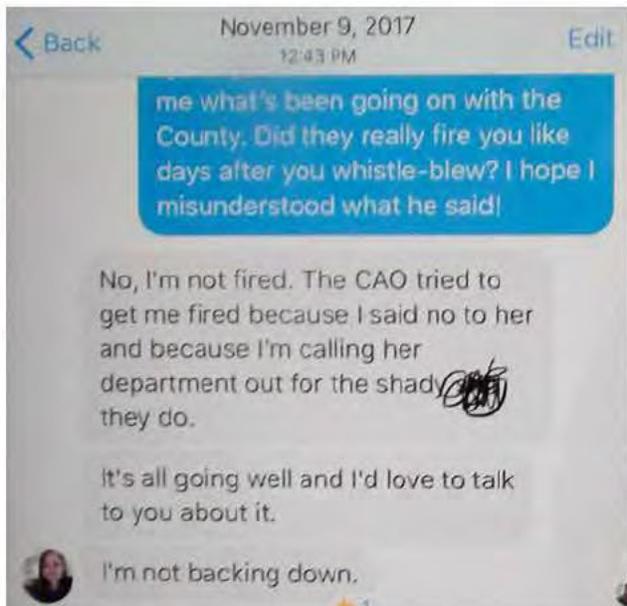
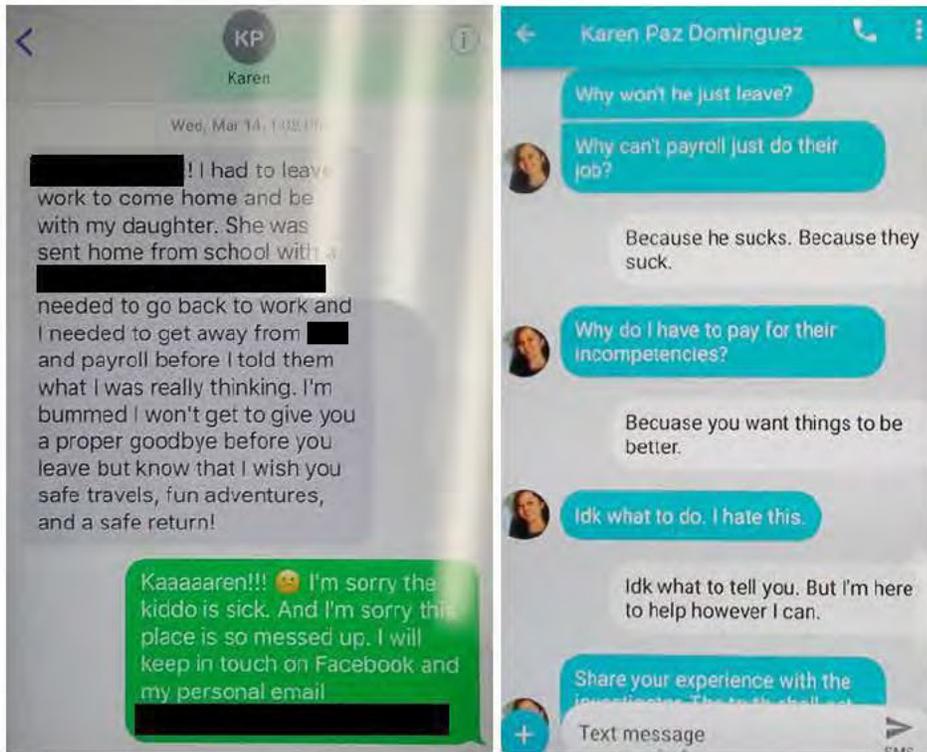
DIGITAL EVIDENCE:

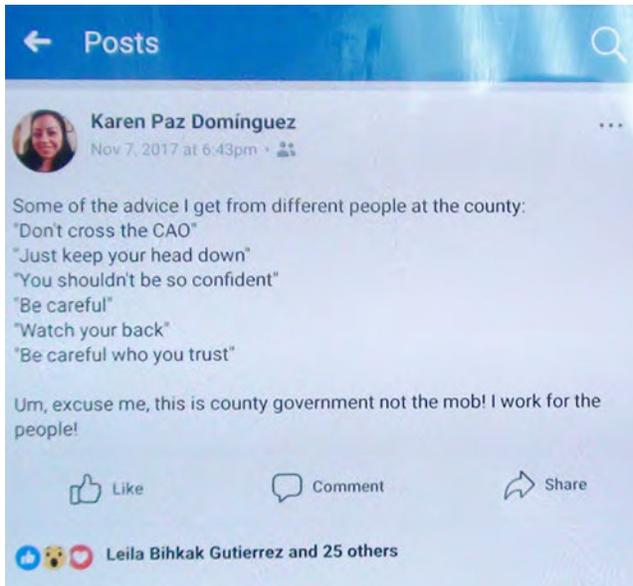
The digital evidence obtained during our investigation is shown below under four different headings they most correlate to; **INSOLENCE, INSUBORDINATION, HOSTILE WORK ENVIRONMENT and USE OF NON-PUBLIC INFORMATION FOR PERSONAL GAIN / REMOVING IMAGES OF CONFIDENTIAL INFORMATION FROM CONTROLLED COUNTY PROPERTY**

INSOLENCE:

Examples of Ms. Paz Dominguez communicating with her subordinates during which she engages in insolence by demonstrating an unprofessional disrespect for her own supervisor and other County department heads.







INSUBORDINATION:

Emails from Ms. Paz Dominguez documenting she knew as of March 14, 2018 she was no longer to interact with ██████████ staff and Ms. Paz Dominguez telling her supervisor (Mr. Mellett) the staff would probably be less resentful if they saw him working.



Verizon 10:24 AM 98%

< Work

completion of the W2-Cs. Everything else is of a lower priority.

From: Paz Dominguez, Karen
Sent: Wednesday, March 14, 2018 10:56 AM
To: Mellett, Joe <JMellett@co.humboldt.ca.us>
[REDACTED]

Subject: RE: PDF [REDACTED] & W-2C DATA 2 (32)

Of course I understand that W-2C's are a priority. It is precisely why I insisted that [REDACTED] get started correcting them 3 weeks before she finally did. [REDACTED] help was supposed to be temporary considering that the rest of the office is severely understaffed. [REDACTED] only works Monday through Wednesday now and [REDACTED] will need to cover the front on Thursday and Friday. [REDACTED] staff is all M&C and can be expected to work additional hours to complete their projects and fix their mistakes and yet auditing staff is working all the overtime to get them done. I have to remain conscious about the rest of the office when distributing work and all I ask is for some consideration and for payroll do to their fair share. If the [REDACTED] team is threatening to quit over being held accountable, then fine, I don't have to participate in [REDACTED] for the time being. I do, however, have 4 other divisions to run and can't keep losing staff to do [REDACTED] job. - Karen

Verizon 10:24 AM

< Work

If the [REDACTED] team is threatening to quit over being held accountable, then fine, I don't have to participate in payroll for the time being. I do, however, have 4 other divisions to run and can't keep losing staff to do [REDACTED] job. - Karen

From: Mellett, Joe
Sent: Wednesday, March 14, 2018 10:44 AM
[REDACTED]

Cc: Paz Dominguez, Karen <KPazDominguez@co.humboldt.ca.us>
Subject: RE: PDF [REDACTED] & W-2C DATA 2 (32)

I told Karen yesterday that W-2Cs are a maximum priority. Please put all available resources into completing that task.

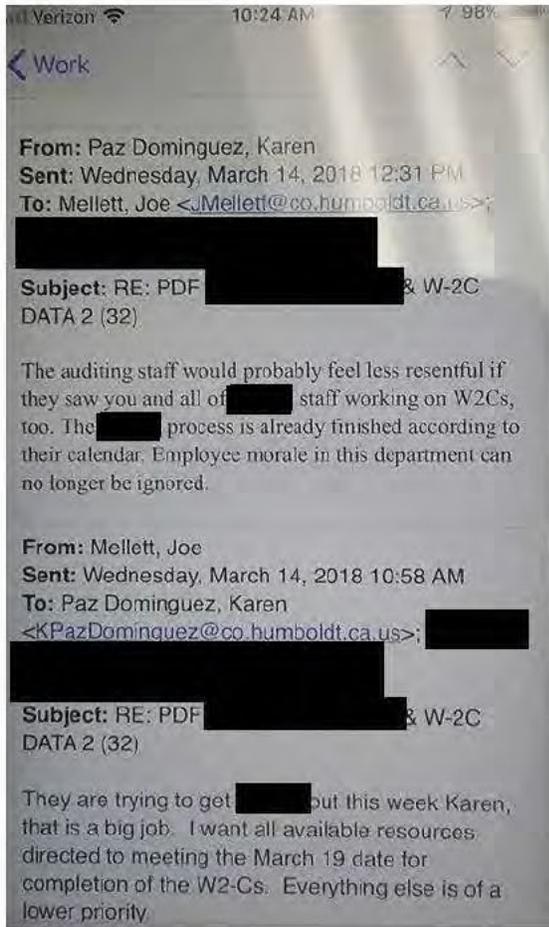
[REDACTED]

Sent: Wednesday, March 14, 2018 9:26 AM
[REDACTED]

Cc: Mellett, Joe <JMellett@co.humboldt.ca.us>
Subject: RE: PDF [REDACTED] & W-2C DATA 2 (32)

If you wouldn't mind I would really appreciate it. I

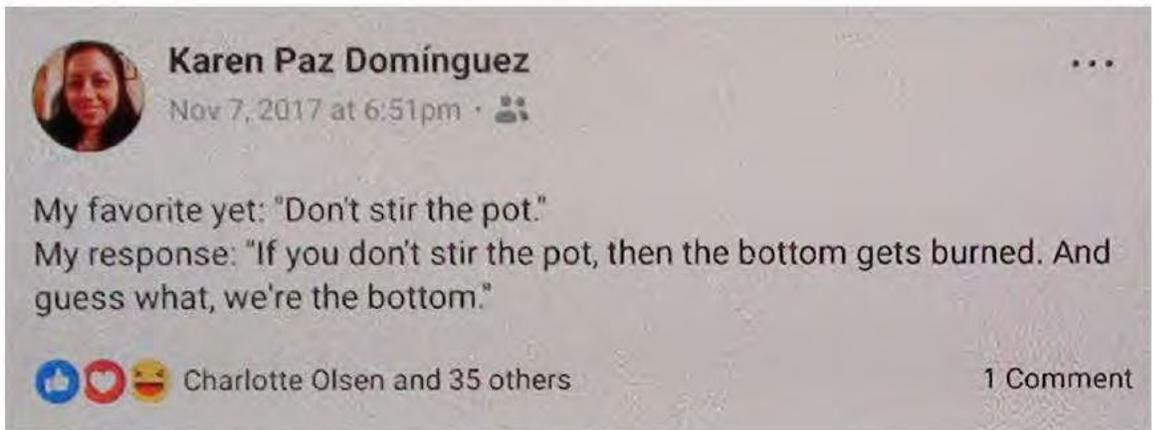
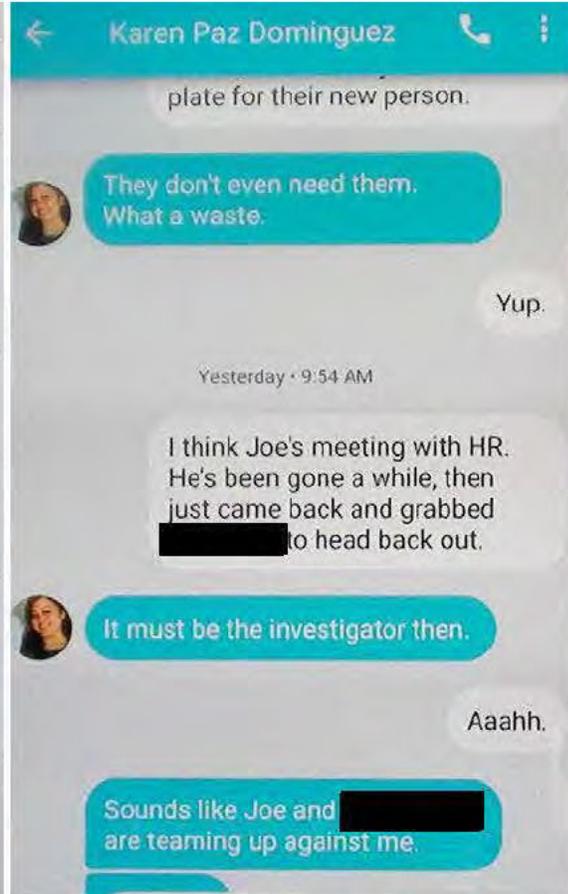
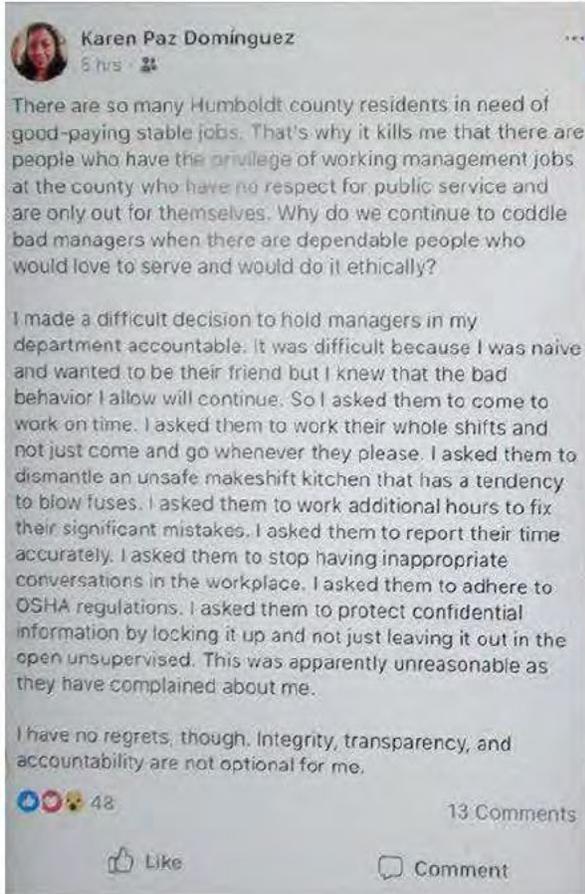


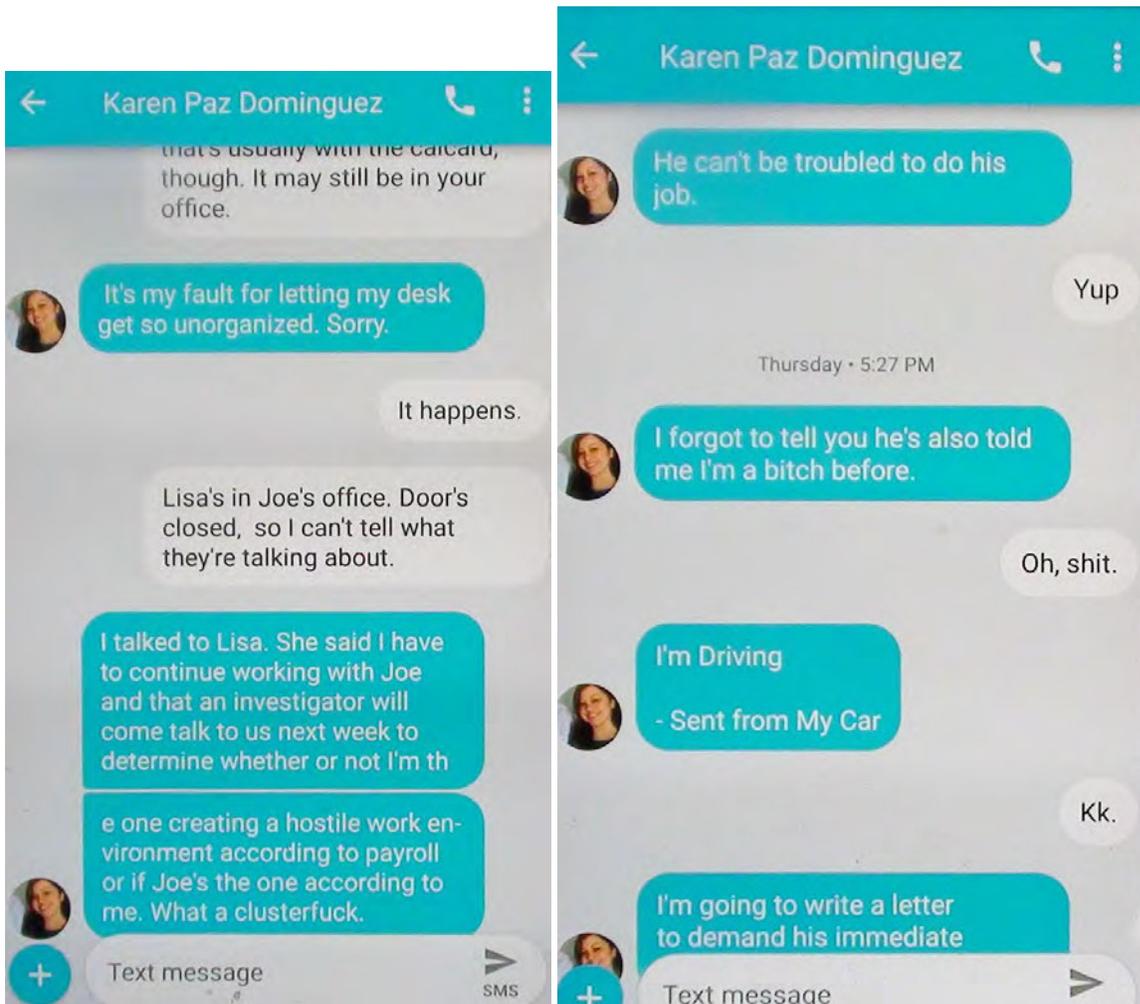
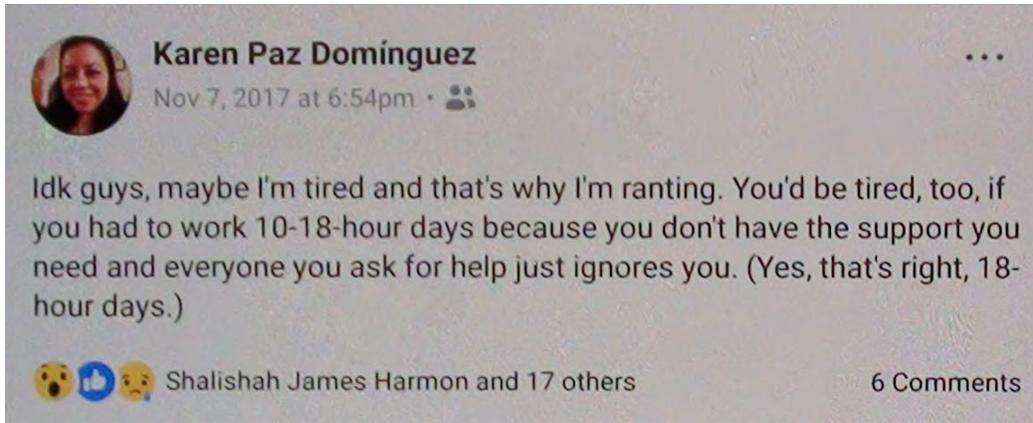


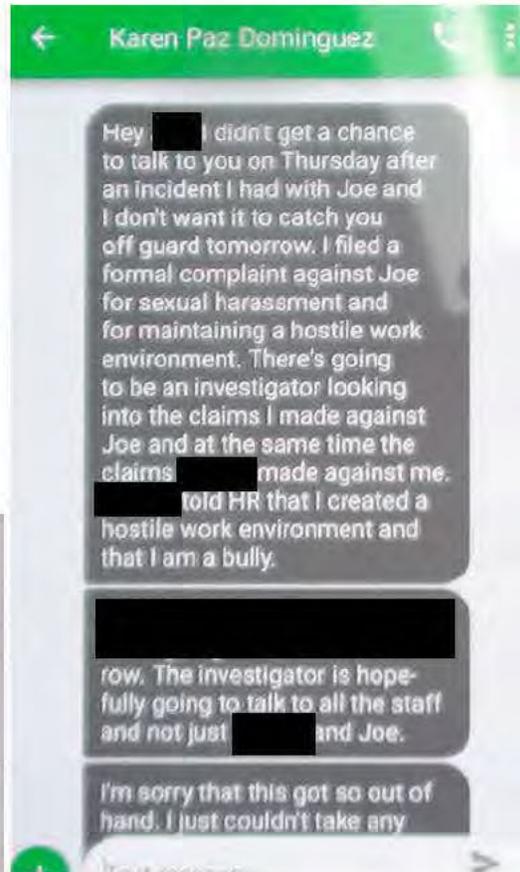
HOSTILE WORK ENVIRONMENT:

Digital communication between Ms. Paz Dominguez and staff members along with social media postings from Ms. Paz Dominguez which fostered a growing discord between [redacted] staff and other division staff and ultimately contributed to the perception of a hostile work environment.









USE OF NON-PUBLIC INFORMATION FOR PERSONAL GAIN / REMOVING IMAGES OF CONFIDENTIAL INFORMATION FROM CONTROLLED COUNTY PROPERTY

NOTE It is unknown if the County of Humboldt has any policy in place regarding the use of non-public information for personal gain but as many government agencies do, this was included in our investigation.

These photographs received from by Ms. Paz Dominguez were admittedly taken by her, using her position as Assistant Auditor Controller to be able to enter the management confidential payroll division office during the evening in order to document confidential information being left out. This was a situation unknown to the public at the time. With the images of confidential information stored in her cellular telephone Ms. Paz Dominguez departed the secured County building and went home. With her knowing she had captured images of the aforementioned situation, which again was unknown to the public at the time, Ms. Paz Dominguez then publically wrote about this situation in a “public viewable” posting on her Facebook. Ms. Paz Dominguez’s Facebook was then utilized for her own personal gain during her election campaign as she twice encouraged viewers during a May 3, 2018 PBS televised debate to go to her Facebook (at times 49:13 and at 54:00). See below link to watch the telecast.



<https://video.pbsnorthcoast.org/video/humboldt-county-auditorcontroller-2018-cyyo7y/>



Per ██████████ a staged photograph taken by Ms. Paz Dominguez to show confidential information being left out overnight within the ██████████ division.

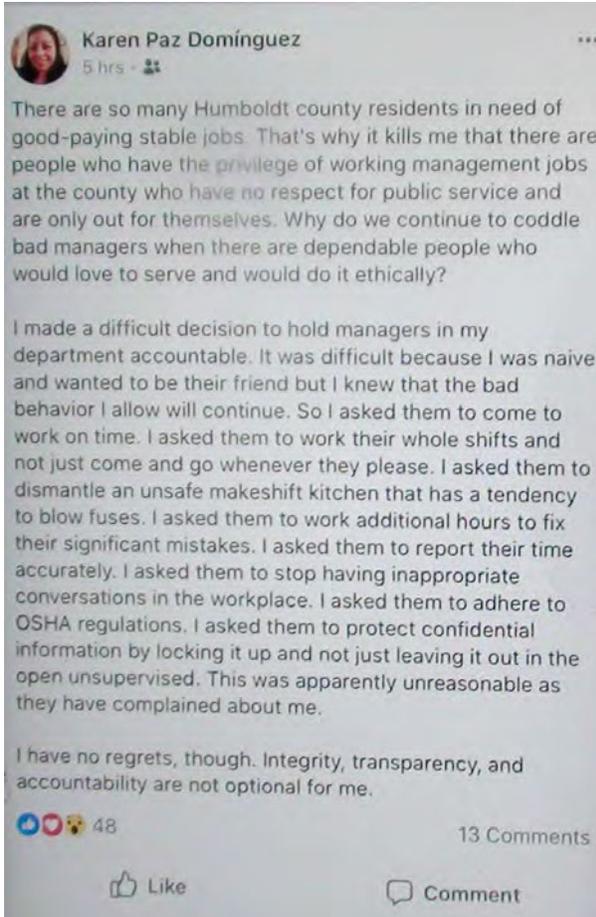


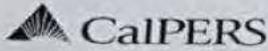
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California Public Employees' Retirement System
P.O. Box 942709 Sacramento, CA 94229-2709
888 CalPERS (or 888-225-7377)
TTY: (877) 249-7442 | Fax: (916) 795-4166
www.calpers.ca.gov

RECIPROCAL SELF-CERTIFICATION FORM

Employee Name
Date of Birth

Check the

I have not been a member of a qualifying Public Retirement System in California.
 I have prior membership under another Public Retirement System in California. (Complete the box below with verified dates including month, date, and year. If you are unsure of the dates please contact the Public Retirement System to confirm information prior to completing form.)

| Name of Most Recent Reciprocal System: | Membership Date: | Separation Date*: | <input type="checkbox"/> Retired* <input type="checkbox"/> Refunded* Date: / / |
|--|------------------|-------------------|---|
| Name of Prior Reciprocal System: | Membership Date: | Separation Date*: | <input type="checkbox"/> Retired* <input type="checkbox"/> Refunded* Date: / / |
| Name of Prior Reciprocal System: | Membership Date: | Separation Date*: | <input type="checkbox"/> Retired* <input type="checkbox"/> Refunded* Date: / / |

*Please provide dates, if applicable. Not all sections may be applicable for each Reciprocal System.

I understand that by accepting employment in a qualified retirement system, I am subject to the applicable laws and regulations of that system. I also understand that completing this form does not constitute a request to establish reciprocity.

I hereby certify that the foregoing information has been verified as true and correct and any information found to be incorrect may require corrections to my account in the California Public Employees' Retirement System including, but not limited to, my benefits. I agree to make any necessary corrections to my account to ensure I receive my retirement benefits.

██████████
Date

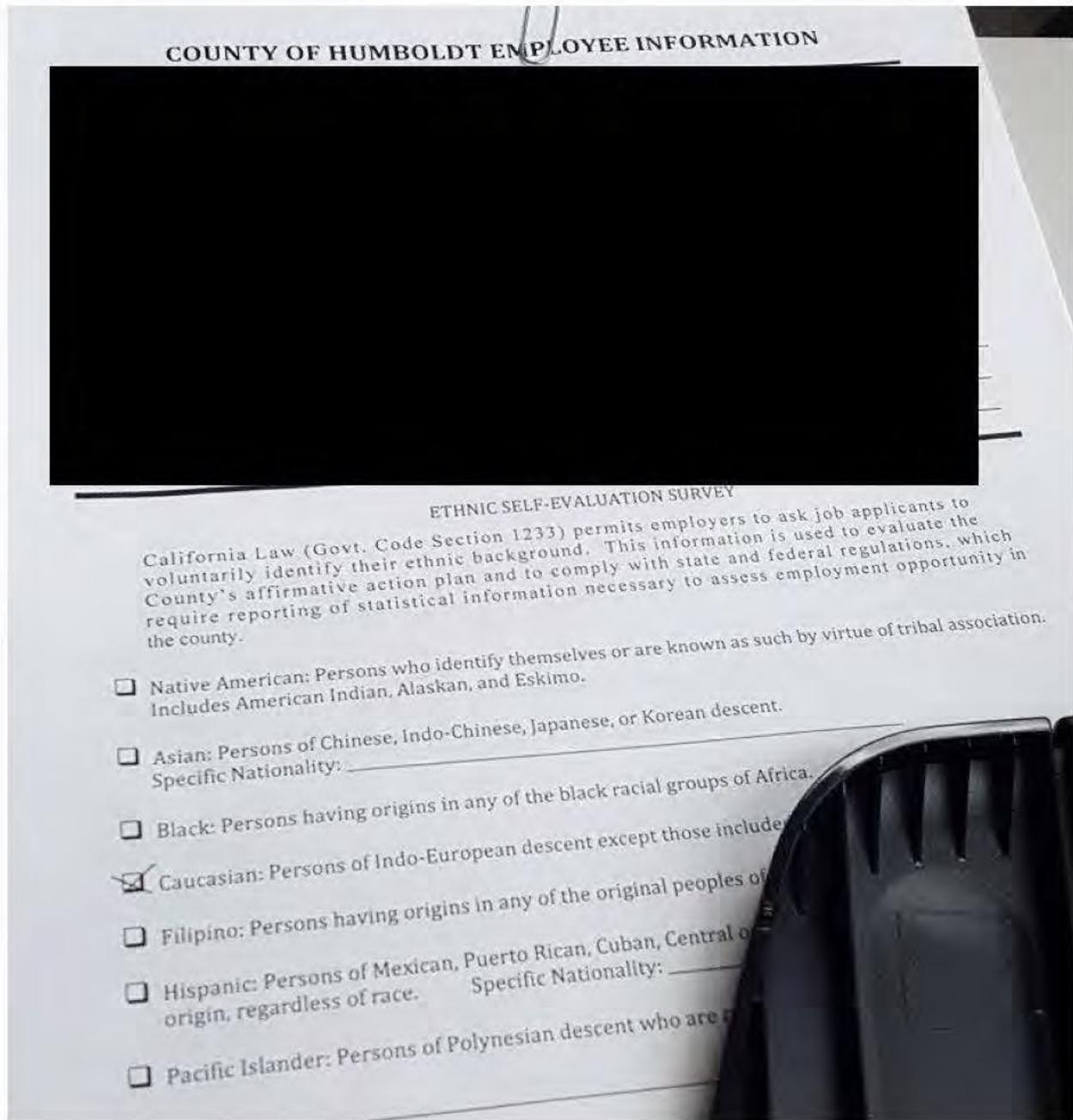
12/30/17
Date

TO BE COMPLETED BY EMPLOYER ONLY:

| | | |
|------------------------------------|------------------------------|---|
| Name of CalPERS Agency: | CalPERS Business Partner ID: | Employee's CalPERS Original Hire Date: |
| Designee of Employer: (Print Name) | (Title) | Employee's CalPERS Membership Eligibility Date: |
| Designee's Signature: | | (Date) |

The employer must retain this form in the employee's file for auditing purposes.





Executive Summary:

SPECIFIC ALLEGATIONS:

admittedly never filed a complaint of her own with specific allegations and rather joined in with two other employees; to file a group complaint on May 3, 2018. Prior to this, on March 26, 2018 did



submit written complaints to HR with specific allegations against Ms. Paz Dominguez. Using these three documents and additional specific allegations they each made during their statements an Executive Summary has been prepared. Although a hostile work environment can exist if the criteria for such is met, an employer, in this case the County of Humboldt, cannot be held liable for such unless the alleged actions or conduct were due to discrimination of a protected class or the actions or conduct were based upon a protected class. As the specific alleged actions and conduct have previously been detailed within this report, the allegations listed below are more general and represent a grouping of those specific actions/conduct.

1. Ms. Paz Dominguez fostered an atmosphere of hostility, retaliation and bullying.

Through her own behaviors towards the ██████████ employees, including the use of aggressive tones of voice, belittling employees in front of their peers and implying to employees their jobs were in jeopardy after she was reprimanded, Ms. Paz Dominguez made such actions appear acceptable to the ██████████ employees. She further fostered hostility, retaliation and bullying by complaining directly to her ██████████ subordinates about the perceived issues she was having with the ██████████ employees.

2. Ms. Paz Dominguez demonstrated a lack of leadership, mismanagement and making poor policy decisions.

Through her repeated inconsistent requests, micro-managing of employees, implementing procedures without thorough research, refusal to accept any responsibility when errors occurred and not accepting constructive criticism from her seasoned subordinates Ms. Paz Dominguez demonstrated a lack of leadership, mismanagement and made poor policy decisions.

3. Ms. Paz Dominguez established a pattern and practice of inequitable treatment of department personnel.

Through her failure to consistently provide the same clear and concise direction to the ██████████ employees as she did for her ██████████ subordinates and her efforts to restrict ██████████ employees from assisting ██████████ employees when circumstances called for such Ms. Paz Dominguez established a pattern and practice of inequitable treatment of department personnel.

4. Ms. Paz Dominguez's actions and comments caused animosity amongst the employees and increased employee's stress and anxiety.

Through her repeated attempts to befriend her ██████████ employees, her complaining to the ██████████ employees about the ██████████ employees and her fueling the ██████████



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employees perception that ██████████ employees receive unwarranted special privileges Ms. Paz Dominguez caused animosity amongst the employees and increased employee's stress and anxiety.

5. Ms. Paz Dominguez was repeatedly inconsistent in her directives and blamed her errors on her subordinates.

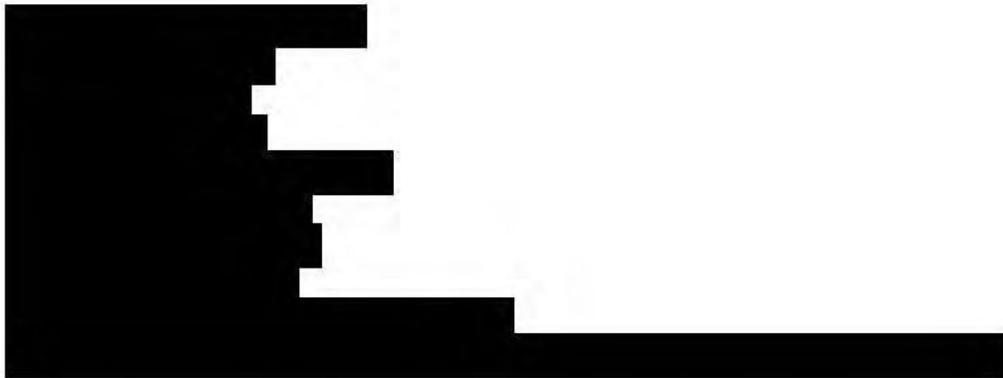
Self explanatory with examples provided in the report.

6. Ms. Paz Dominguez treated some employees in a rude manner, belittled some employees and treated some employees in a condescending manner.

Self explanatory with examples provided in the report.

Attached Documents:

The following attached documents were obtained, examined and utilized as noted within the report during our investigation:



Additional Investigation to be Performed or Recommended:

This completes our Final Report on ██████████ v Paz Dominguez. If you have any questions please do not hesitate to contact me. Thank you.

Yours truly,



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James Filomeo

FILOMEO INVESTIGATIVE SERVICES



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