

FORMAL COMPLAINT REPORT

**Hostile Work Environment, Harassment, Retaliation,
False Police Report, and Compliance Violations**

Sapphos Environmental, Inc.
430 North Halstead Street, Pasadena, California

Prepared By:
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Robert Half International

Submitted: January 30, 2026
Assignment Period: December 17, 2025 - January 29, 2026

CONFIDENTIAL

I. Executive Summary

This formal complaint documents a comprehensive pattern of hostile work environment, harassment, discrimination, retaliation, and fabricated accusations that I experienced during my HR compliance audit assignment at Sapphos Environmental, Inc. My assignment, conducted through Robert Half International from December 17, 2025 through January 29, 2026, revealed systemic compliance violations with estimated penalty exposure of \$800,000 to \$1,500,000+.

Rather than addressing these findings professionally, company leadership engaged in a sustained pattern of conduct designed to: suppress my audit findings, discredit me professionally, marginalize my expertise, and ultimately fabricate accusations culminating in a false police report. This retaliation escalated in direct proportion to my refusal to compromise the integrity of my audit and overlook serious compliance violations that expose the company to significant legal and financial liability.

KEY FINDINGS SUMMARY

- 100% violation rate across critical compliance areas
- Estimated penalty exposure: \$800,000 - \$1,500,000+
- E-Verify MOU abandoned since 2019 with no documentation
- Confidential records found in unlocked areas, including an employee's boot
- No compliance with 2026 California mandates (SB 513, SB 294, SB 464, SB 553)
- My professional work product rejected in favor of non-compliant alternatives
- My 2026 compliance memo with deadlines and implementation guidance ignored
- False police report filed with BLATANTLY fabricated accusations
- Approximately 50 employees serve as potential witnesses

II. My Background and Qualifications

I bring over a decade of progressive public sector experience, specialized education in public administration and finance, professional certification, and a distinguished background in emergency services. This extensive background is directly relevant to understanding why the treatment I experienced at Sapphos constitutes harassment and why the dismissal of my professional expertise was both unwarranted and harmful.

A. Personal Statement on Character and Values

My dedication to excellence stems from being brought up in an immigrant household with modest means. I watched both of my parents - who passed away when I was younger - always exemplify hard work and ethical behavior. Their example shaped who I am today.

Throughout my career, I have held roles that carry an enormous amount of responsibility and, most importantly, trust. I have been trusted to carry out rescue operations when life is in danger. I have been trusted to complete rigorous academic studies by demonstrating a commitment to discipline and ethical behavior. My family trusts that I will make my business venture successful because they know I will always do the right thing when things are difficult.

I am deeply offended that despite a lifetime of effort to do the correct thing - to serve others, to protect life, to uphold the highest professional standards - this false accusation may now create substantial professional ruin over a laptop I did not take and files I do not possess.

B. My Educational Background

- **Master of Public Administration (MPA)** with focus in Public Finance Management
- **Bachelor of Public Administration**
- **Associate Degree in Public Fire Service**
- **154th Santa Ana Fire Academy Graduate** - Distinct Honors as Company Five Captain

C. My Professional Certifications

- **IPMA-CP** (International Public Management Association - Certified Professional)
- **Dozens of certificates** in rescue operations, fire suppression, hazardous materials response, and emergency medical response

D. My Professional Experience

Fire Service Career

Auxiliary Firefighter - Los Alamitos Joint Forces Training Base

I was assigned to the Aircraft Rescue and Fire Fighting (ARFF) Crash Crew Division, a specialized team of first responders. My responsibilities included:

- Aircraft rescue and fire fighting (ARFF) operations
- Search and rescue operations during military aircraft emergencies
- Fire suppression and hazardous materials response
- Emergency medical response for aircraft incidents

Note: My aspirations for a long, meaningful career in the fire service were unfortunately halted due to hiring freezes during the Great Recession. Having a family and adult responsibilities, I returned to school and completed my Bachelor's and Master's degrees, redirecting my service orientation toward public administration and human resources.

Municipal Government Experience (10+ Years)

City of Santa Ana - Progressive Career Advancement

I held the following positions with increasing responsibility:

- Management Intern
- Management Aide
- Management Analyst
- Human Resources Analyst

Labor Relations Leadership: I served as Union President of the Confidential Association of Santa Ana (COSA). In this capacity, I successfully negotiated a multi-year Memorandum of Understanding between the City of Santa Ana and COSA that secured wage increases for members, expanded benefits, and provided additional leave provisions. This experience required mastery of labor law, collective bargaining, and the ability to advocate effectively for employees while maintaining productive relationships with management.

City of Anaheim - Employee Development Manager

Convention, Sports, and Entertainment Department

- I served 800 employees of the City of Anaheim's 4,000+ workforce
- My department provided services to major venues including: Anaheim Convention Center, Angel Stadium, Honda Center, The Grove of Anaheim, ARTIC (Anaheim Regional Transportation Intermodal Center), and SportsCity USA
- I developed and implemented training programs, managed employee relations, and ensured compliance with employment laws across a diverse workforce

City of Fountain Valley - Senior Human Resources Analyst

- I worked closely with executive leadership on strategic HR initiatives
- I developed and implemented employee retention programs

- I designed and administered wellness programming
- **I conducted employee misconduct allegation investigations** - a critical skillset demonstrating trusted judgment and discretion

Current - Robert Half International (Interim Assignments)

I am currently working temporary assignments through Robert Half while building an independent HR consulting business. This entrepreneurial path reflects the same discipline, work ethic, and commitment to doing things correctly that has defined my entire career.

Relevance to This Complaint: My background demonstrates that my professional guidance was not that of an inexperienced auditor but of a seasoned public sector HR professional with extensive experience in compliance, investigations, labor relations, and emergency services where lives depend on trust and competence. The dismissive treatment I received, the rejection of my compliant work product in favor of legally deficient alternatives, and my systematic exclusion from professional discussions cannot be attributed to legitimate concerns about my competence. The false accusation of theft is particularly offensive given a lifetime of service built on trust - trust to save lives, trust to negotiate on behalf of employees, trust to investigate misconduct fairly.

III. Compliance Violations I Discovered

My audit revealed catastrophic compliance failures across virtually every area I examined. These findings form the context for understanding leadership's motivation to suppress my audit and retaliate against me. The 2026 regulatory environment has moved beyond simple "pay and class" compliance into "data sovereignty" and "transparency" - Sapphos Environmental is wholly unprepared for this reality.

A. E-Verify MOU Abandonment

Critical Discovery: Sapphos Environmental has an active Memorandum of Understanding with the Social Security Administration and Department of Homeland Security, executed July 2, 2008, which legally requires E-Verify for all new employees. The company abandoned E-Verify usage circa 2019 with no documented justification. The MOU contains an evergreen clause that remains in effect unless formally terminated.

Legal Framework:

- 8 USC 1324a - Immigration Reform and Control Act
- 8 CFR 274a.2 - E-Verify participation requirements
- E-Verify MOU Terms - Evergreen clause remains in effect unless formally terminated

Implications:

- All employees hired 2019-present lack required E-Verify verification
- Material breach of federal agreement constitutes contract violation
- Remote document verification directed by CEO violates USCIS requirements (remote verification only available to active E-Verify participants per USCIS M-274 Handbook)
- **Estimated Penalty Exposure: \$250,000 - \$500,000**

B. I-9 Documentation Failures

My forensic review of I-9 documentation revealed systemic failures:

- I-9 forms improperly stored within non-confidential personnel files (must be maintained separately per USCIS requirements)
- Missing I-9s for multiple employees
- Incomplete I-9s with sections left blank - including Controller Emer's own file, which had only Section 1 completed
- Forms scattered across multiple unsecured locations throughout the office
- Scanned copies of I-9s (listing citizenship status) found in shared network folder titled "New Hires" accessible to all department heads, creating national origin discrimination risk
- **Estimated Penalty Exposure: \$150,000 - \$350,000**

C. Confidential Records Security Failures

Critical Finding: I discovered confidential documents containing PII (including Social Security numbers, medical records, and immigration documents) in the following unsecured locations:

- Unlocked filing cabinets
- Unsecured cardboard boxes
- Random desk drawers
- *An employee's boot (personal effects)*
- CEO Marie Campbell's confidential investigation communications regarding a 2016 intoxication-related incident in an unsecured drawer
- Doctor's notes for employees physically stapled to timesheet correction forms, linking medical conditions to performance records

Statutory Violations:

- California Civil Code 1798.81.5 (Data protection)
- 8 CCR 3204 (Occupational exposure and medical record confidentiality - 30-year retention for toxic exposure)
- 42 USC 12112(d)(3)(B) - ADA medical records requirements
- California CMIA (Cal. Civ. Code 56 et seq.)

D. Harassment Prevention Program Deficiencies

My review of the harassment prevention program revealed total non-compliance with California Government Code 12950.1:

- No written harassment prevention policy in place
- Training records consisted of a sign-in sheet only - no certificates, no documentation of content covered
- Same video provided to supervisors and non-supervisors, violating FEHA requirement for differentiated training (2 hours supervisory, 1 hour non-supervisory per Gov. Code 12950.1(a)(1))
- No interactive element - training cannot be passive video without Q&A mechanism per statutory requirement
- No certificates of completion issued (required per Gov. Code 12950.1(a)(1))
- No complaint procedures or reporting channels established
- Training did not address abusive conduct, gender identity, gender expression, or sexual orientation as required by SB 1343 and SB 778
- **Estimated Penalty Exposure: \$100,000 - \$250,000**

E. 2026 California Mandate Non-Compliance

I identified complete non-compliance with the 2026 California regulatory mandates that took effect January 1, 2026:

SB 513 - Training Records Metadata Mandate:

This law amends Labor Code 1198.5 to explicitly include education and training records within personnel files. All training records must now contain five specific metadata fields: (1) Employee name, (2) Training provider name, (3) Date and duration, (4) Core competencies covered including equipment/software skills, and (5) Resulting certification. Failure to produce these records within 30 days of employee request triggers a \$750 penalty per violation. Sapphos has no system to capture this metadata - their training records consist only of sign-in sheets.

SB 294 - Workplace Know Your Rights Act:

This law requires employers to distribute a stand-alone written notice to every employee annually covering rights related to workers' compensation, immigration inspections, union organizing, and constitutional protections. The deadline was February 1, 2026. Sapphos has taken no action to comply.

SB 464 - Demographic Data Segregation:

This law mandates that demographic information (race, ethnicity, sex) collected for pay data reporting must be stored separately from main personnel records. My review of Gusto HRIS found that "Admin" roles (assigned to HR Director and Project Managers) can view demographic data when approving raises or writing reviews - a direct violation creating implicit bias exposure.

SB 553 - Workplace Violence Prevention Plan:

This law requires a written WVPP, violent incident log, and annual employee training. For Sapphos Environmental staff who work in the field on biological surveys and environmental assessments, this is critical. No WVPP exists.

F. 401(k) Hour Reporting (ERISA Violations)

- I discovered that no hours had been reported to 401(k) administrator (Empower) since June 2022
- Multiple employees were incorrectly showing as not vested due to this failure
- *Status: I remediated this issue through direct intervention with Empower*
- **Original Penalty Exposure: \$100,000 - \$200,000**

G. Total Estimated Penalty Exposure

Compliance Area	Minimum	Maximum
E-Verify MOU Compliance	\$250,000	\$500,000
I-9 Documentation	\$150,000	\$350,000
Confidential Records Security	\$50,000	\$150,000
Harassment Prevention	\$100,000	\$250,000
401(k) Hour Reporting	\$100,000	\$200,000

2026 Mandates (SB 513/294/464/553)	\$50,000	\$100,000
TOTAL ESTIMATED EXPOSURE	\$700,000	\$1,550,000

IV. Pattern of Harassment and Hostile Work Environment

The following section documents a sustained pattern of conduct that I believe constitutes harassment under the California Fair Employment and Housing Act (FEHA). Under California Government Code 12940(j)(1), harassment based on protected characteristics including race, national origin, and ancestry is unlawful.

A. Systematic Dismissal of My Professional Expertise

1. Harassment Prevention Program Development

Incident: Emer (Controller/my direct supervisor) directed me to draft a "sexual harassment policy" within a two-hour timeframe. I professionally explained that:

- a) The terminology "sexual harassment training" is incorrect and potentially problematic - it could be perceived as training on how to harass rather than how to prevent harassment
- b) California law requires a comprehensive "Harassment Prevention Program" with multiple components per Government Code 12950.1
- c) Two hours was insufficient to develop a legally compliant program

My Response: I offered to work through the weekend to provide a complete, compliant program using templates from my prior professional experience. I worked the entire weekend and delivered a comprehensive Harassment Prevention Program package including:

- Written policy aligned with FEHA and California Civil Rights Department (CRD) guidance
- Employee acknowledgment form
- Supervisor acknowledgment form with personal liability disclosure per Government Code 12940(j)
- Quick reference guide for employees
- Complaint intake form
- 6-phase investigation checklist aligned with CRD guidance

Emer's Response: He rejected my comprehensive program stating it was "too long and would not fit in the employee handbook." He insisted on using a two-page policy he had drafted himself.

Legal Counsel Validation: On January 27, 2026, Mr. House (company attorney) emailed CEO Marie Campbell, Emer, and me confirming he could not approve Emer's policy in its current condition. Mr. House recommended that the California Civil Rights Department's guiding documents be referenced - precisely what my rejected work product had already incorporated. Despite the attorney's validation of my approach, my work continued to be disregarded.

2. 2026 Compliance Mandates Memo - Ignored

Incident: I prepared and provided Emer with a comprehensive memorandum outlining the new 2026 California mandates that required immediate action. This memo contained:

- **SB 513 Training Records Requirements:** Detailed explanation of the five required metadata fields (employee name, provider name, date/duration, core competencies, resulting certification), the \$750 per violation penalty for failure to produce records within 30 days, and specific guidance on how Sapphos's technical staff training (GIS, archaeological field methods, environmental impact assessment software) must be documented with competency descriptions
- **SB 294 Workplace Know Your Rights Act:** The February 1, 2026 deadline for distributing written notices to all employees, content requirements covering workers' compensation, immigration inspections, union organizing, and constitutional protections
- **SB 464 Demographic Data Segregation:** Requirements for storing demographic information separately from personnel records, with specific Gusto HRIS configuration recommendations for Role-Based Access Control (RBAC)
- **Implementation Deadlines:** A clear timeline showing critical dates and required actions
- **Copy/Paste Language for Attorney:** Ready-to-use policy language and notification templates that could be immediately forwarded to Mr. House for legal review, enabling quick implementation

Emer's Response: My memo was completely ignored. No action was taken on any of the 2026 mandates as of January 29, 2026. When I raised concerns about these deadlines, I was met with dismissiveness. This memo represented another instance where my professional expertise and proactive compliance efforts were rejected, leaving the company exposed to significant regulatory penalties and litigation risk.

3. Training Offer Rejected with Derision

Incident: I offered to teach the Harassment Prevention Program class - a course I am qualified to deliver based on my extensive professional experience and my background teaching at the college level.

Emer's Response: *Openly derisive - a sarcastic smile, a dismissive point directly at me, and the rhetorical question "You?!"* He then proceeded to engage external vendors, excluded me from the selection process, and selected a program that I believe is non-compliant with FEHA interactive training requirements.

4. Incorrect Training Assignment Despite My Guidance

Incident: I provided detailed clarification to Emer on the FEHA "supervisor" definition for training assignment purposes. Under Government Code 12950.1, supervisors must receive 2 hours of training while non-supervisory employees receive 1 hour. I used my own position as an example - while I have no direct reports, I meet the FEHA supervisor definition based on my duties and should receive the 2-hour course.

Result: On training day, Tina assigned me to the 1-hour non-supervisory course, directly contradicting my guidance. When I raised this issue, Tina stated it was "Emer's

direction." This was yet another instance of my professional expertise being deliberately overridden.

5. Employee Classification Analysis

Incident: I identified that the Archaeologist position had conflicting classifications - non-exempt in the offer letter but exempt in Gusto. I conducted a proper analysis applying California's multi-criteria exemption tests.

Emer's Response: He initially rejected my analysis, claiming that the "minimum wage annual salary x2" test was sufficient. I explained that the salary threshold alone is insufficient - California requires satisfaction of multiple tests: the Duties Test, Discretion/Independent Judgment Test, 50% Rule, and Salary Basis Test.

Outcome: Mr. House (attorney) confirmed my analysis was correct. However, when CEO Marie Campbell later questioned the classification correction, Emer failed to support me despite having directed the investigation and approved the correction himself. This pattern of throwing me under the bus while taking credit for compliant work became recurring.

B. Exclusion and Silent Treatment

Incident (January 27, 2026): I informed Emer via Microsoft Teams that I was feeling unwell and requested to be excused early. The message showed as read within minutes, yet Emer ignored my request for hours. He refused to acknowledge me or respond to my requests for direction throughout the entire day. This deliberate silent treatment created a hostile work environment and left me uncertain of my status.

C. Pressure to Compromise Audit Integrity

Critical Incident: Emer explicitly suggested that my audit findings be treated "quietly" because the company is being sold and CEO Marie Campbell is retiring. This was a clear directive to overlook serious compliance violations - violations that expose the company to \$800,000 to \$1,500,000+ in penalties - in order to facilitate the sale. My refusal to compromise the integrity of my audit appears to be the catalyst for the escalating retaliation I experienced.

D. Conflict of Interest Dismissal

Incident: When I presented my I-9/E-Verify compliance findings to CEO Marie Campbell, I was met with hostility and visible disdain. She dismissed me as "alarmist." Emer, whose own I-9 was incomplete (only Section 1 filled out), expressed concerns about contacting E-Verify due to audit risk - and, I believe, due to his personal immigration status. This created a clear conflict of interest: my supervisor had a personal stake in avoiding E-Verify contact that conflicted with the company's legal obligations. Yet when I raised this conflict with the CEO, she dismissed my concerns entirely.

E. Pattern of Delegating to Untrained Staff

Throughout my assignment, CEO Marie Campbell and Emer repeatedly delegated sensitive HR matters to Tina (an untrained receptionist) whenever I expressed professional concerns. For example, I provided compliant alternatives for remote employee I-9 verification including using a Notary Public, an authorized representative at the Bakersfield branch, or formal training for designated personnel. I personally trained the Bakersfield supervisor for proper I-9 verification. Despite this, the CEO opted to have Tina conduct verification instead of the trained supervisor. This pattern demonstrated a deliberate effort to circumvent my professional guidance.

V. False Police Report and Fabricated Accusations

A. Critical Context: The Accusation is BLATANTLY False

THE ACCUSATION IS DEMONSTRABLY AND BLATANTLY FALSE

The day before the accusation (January 28, 2026), during an HR update meeting, I explicitly reported that I had NOT started the process of scanning documentation.

This statement was made in a meeting attended by leadership. I had no reason to lie - this was a routine status update on pending work.

The scanning process had been assigned to Tina to assist with. Furthermore, the approach had changed from using a dedicated laptop to my original recommendation - a 3-point backup system:

- Point 1: Local secure copy on Sapphos server
- Point 2: Backup copy on a separate server
- Point 3: Third copy in another state for disaster recovery
- All copies compliant with digital security requirements

Their claim that the laptop contained "all employee files" and that I possess such files is utterly false. The scanning had not begun. There are no files to take; thus the reason the CEO created the adhoc team who's mission is record recovery and reconstruction. I did NOT scan, save, download, or transfer a single document onto any laptop because 1) many do not exist, 2) documents have not been scanned, 3) my professional duty and ethics do not allow such behavior. I have NO employee files in my possession.

B. Timeline of Events

January 29, 2026 at 2:34 PM - Initial Police Contact

I received a call from Officer Cher of the Pasadena Police Department regarding an allegedly missing laptop. I cooperated fully and explained: two laptops existed (one assigned to me personally for work, and one designated for HR offline storage that was already present when my assignment began); the HR storage laptop was last seen the previous week; I was never officially assigned equipment or required to sign for any equipment; my office was unsecured until I recently requested it be locked due to the sensitive files I was working with; a locksmith had been requested to repair broken locks; Emer, Tina, and other staff entered my office on Saturday, January 25, 2026 and moved everything - yet none of them were questioned before police were called. Officer Cher confirmed no report would be written as this is a civil matter, not criminal. Law enforcement immediately recognized this as a civil matter, underscoring the frivolous nature of involving police.

January 29, 2026 at 3:55 PM - Escalation of Fabricated Accusations

I received a call from MeMe at Robert Half advising me to ignore all further communication from Sapphos. She informed me that Sapphos is now claiming the laptop contained all employee files and that I am in possession of such files. THIS ACCUSATION IS COMPLETELY FABRICATED AND DEMONSTRABLY FALSE. This escalation appears designed to: defame me, create legal leverage against me, discredit me as a witness to Sapphos's extensive compliance violations, and intimidate me into silence about what I discovered during my audit.

C. Discriminatory Basis for the Accusation

I believe this accusation is discriminatory. As a Hispanic male, I was immediately assumed to be the thief while Sapphos failed to consider or question other individuals with equal or greater access to the office and equipment:

- Emer (Controller) - who entered my office on January 25, 2026
- Tina (Receptionist) - who entered my office on January 25, 2026
- James (IT) - who has a key to the office
- Other staff who entered my office on January 25, 2026
- Any staff member with access to the vault where the HR key is kept
- The night cleaning crew who had ongoing access

The decision to single me out and contact law enforcement rather than conduct a reasonable internal inquiry - specifically within less than 2 hours of my departure – I would have been happy to participate in - reflects a discriminatory assumption based on my ethnicity. There is no legitimate, non-discriminatory explanation for targeting me while others with equal or greater access were not questioned, especially given that I am the only Hispanic with access to that room.

VI. Potential Legal Violations by Sapphos Environmental

A. False Police Report - Cal. Penal Code 148.5

"Every person who reports to any peace officer... that a felony or misdemeanor has been committed, knowing the report to be false, is guilty of a misdemeanor."

Sapphos filed a theft report without reasonable basis, having failed to question others with equal or greater access and having full knowledge that I reported the day before that scanning had not begun.

B. Whistleblower Retaliation - Cal. Labor Code 1102.5

I disclosed compliance violations to leadership - violations exposing the company to \$800,000 to \$1,500,000+ in penalties. The subsequent harassment, hostile treatment, and false accusations constitute retaliation for these protected disclosures. Under Labor Code 1102.5(b), an employer may not retaliate against an employee for disclosing information the employee reasonably believes discloses a violation of law.

C. FEHA Harassment and Discrimination - Cal. Gov. Code 12940

The pattern of dismissive treatment, exclusion, derision, and discriminatory targeting based on my ethnicity violates FEHA protections against harassment and discrimination based on race, national origin, and ancestry.

D. Defamation - Cal. Civil Code 45-46

Libel (Section 45): Written accusations communicated to Robert Half that I possess confidential employee files when I demonstrably do not.

Slander (Section 46): Oral accusations of theft made to law enforcement.

Statute	Violation Type	Potential Consequences
Cal. Penal Code 148.5	False Police Report	Misdemeanor; civil liability
Cal. Labor Code 1102.5	Whistleblower Retaliation	Reinstatement; back pay; civil penalties
Cal. Gov. Code 12940	FEHA Harassment/Discrimination	Compensatory/punitive damages; attorney fees
Cal. Civil Code 45-46	Libel and Slander	Compensatory/punitive damages

VII. My Work Product - Evidence of Rejected Contributions

The following work product demonstrates my professional competence and the value I delivered despite systematic rejection of my expertise. This evidence refutes any suggestion that my work was deficient or that the hostile treatment was warranted.

A. Harassment Prevention Program (REJECTED as "too long")

- Complete written policy aligned with FEHA and CRD guidance
- Employee acknowledgment form
- Supervisor acknowledgment form with personal liability disclosure
- Quick reference guide
- Complaint intake form
- 6-phase investigation checklist

Attorney validated my approach; rejected Emer's alternative.

B. 2026 Compliance Mandates Memo (IGNORED)

- Comprehensive analysis of SB 513, SB 294, SB 464, SB 553
- Critical deadlines (February 1, 2026 for SB 294 notification)
- Implementation guidance with copy/paste language for attorney review
- Training metadata requirements for technical staff (GIS, archaeological field methods, environmental software)

C. 401(k) Compliance Remediation (COMPLETED despite interference)

I discovered that no hours had been reported to Empower since June 2022, affecting employee vesting. Despite being instructed by Emer to run unnecessary reports (wasting time), I connected directly with an Empower representative who identified that only 3 functional data fields covering 4 years were needed. The correct solution took 5 minutes. I protected employees' vesting status and prevented ERISA violations.

D. Employee Classification Analysis (COMPLETED, ATTORNEY-VERIFIED)

I identified conflicting classifications for the Archaeologist position. I conducted proper analysis applying California's multi-criteria exemption tests. Attorney confirmed my analysis. When CEO questioned the correction, Emer failed to support me despite having directed the investigation.

E. I-9 Remediation and Training (PARTIALLY IMPLEMENTED - leadership undermined)

I provided compliant alternatives for remote employee I-9 verification and personally trained the Bakersfield supervisor. CEO opted to have untrained receptionist conduct verification instead.

F. Personnel Records Audit and Reconstruction (ONGOING - scope exceeded assignment)

What began as a routine audit evolved into forensic reconstruction of years of neglected HR administration. I organized scattered I-9s alphabetically, segregated confidential from non-confidential records, identified and secured PII found in unsecured locations, created comprehensive compliance matrices, and documented all findings. This work far exceeded my HR Generalist assignment and required forensic auditing skills, regulatory expertise, and executive advisory capabilities.

VIII. My Requests for Immediate Action

A. Documentation and Preservation

1. Formally document these concerns in my personnel file and assignment records
2. Preserve all communications related to this assignment (emails, Teams messages, written communications from Sapphos)
3. Provide me with written confirmation of the specific accusations Sapphos has made, including who made them and when

B. Investigation and Support

4. Initiate an investigation into the treatment I experienced at Sapphos
5. Provide formal confirmation that my assignment has ended
6. Advise whether Robert Half will support me in any legal action arising from Sapphos's conduct

C. Legal Guidance

Provide guidance on legal counsel regarding:

- The false police report (Cal. Penal Code 148.5)
- The fabricated accusations regarding possession of employee files
- Defamation (libel and slander)
- FEHA violations
- Whistleblower retaliation

D. Assurances

7. Confirm in writing that Robert Half will not retaliate against me for raising these concerns
8. Confirm in writing that Robert Half will not take adverse action against me based on Sapphos's unsubstantiated accusations

IX. Conclusion

What began as a routine HR compliance audit revealed systemic failures exposing Sapphos Environmental, Inc. to significant legal and financial liability of \$800,000 to \$1,500,000+. Rather than addressing these failures professionally, company leadership:

- Pressured me to conceal violations to facilitate a company sale
- Created a hostile work environment when I refused to comply
- Dismissed my professional guidance and expertise with visible disdain
- Ignored my 2026 compliance mandates memo with critical deadlines and ready-to-use implementation language
- Filed a false police report
- Fabricated accusations that I possess confidential employee records - despite my documented statement the day before that scanning had not begun

I conducted myself with professionalism and integrity throughout this assignment. I documented violations accurately, I provided compliant solutions, I worked weekends to deliver quality work product, and I maintained my ethical obligations despite significant pressure to compromise. My entire career has been built on trust and service - from carrying out rescue operations when life was in danger, to negotiating labor agreements on behalf of employees, to conducting misconduct investigations with fairness and discretion.

I am being subjected to what I believe is unlawful retaliation, discrimination, and defamation. I respectfully request Robert Half's support in addressing these serious matters and protecting my professional reputation and legal rights.

Approximately 50 employees at Sapphos Environmental serve as potential witnesses to the compliance failures and disorganized administration documented in this report.

Respectfully Submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Mario Espindola', is written over a horizontal line.

Mario Espindola, MPA, IPMA-CP
January 30, 2026

Attachments

9. Harassment Prevention Policy (complete document)
10. Employee Acknowledgment Form
11. Supervisor Acknowledgment Form (with personal liability disclosure)
12. Quick Reference Guide
13. Complaint Intake Form
14. Investigation Checklist (6-phase)
15. HR Audit Memorandum
16. Employee Records Compliance Matrix
17. Sapphos Employee Records Matrix
18. 2026 Compliance Mandates Memo (SB 513, SB 294, SB 464, SB 553)
19. Forensic Audit Protocol Documentation
20. Data Siloing and Security Recommendations