

EXHIBIT A

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)
ELECTRONICALLY FILED
Superior Court of California
County of Alameda
02/02/2026
Chad Finke, Executive Officer / Clerk of the Court
By: A. Gospel Deputy

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

TESLA, INC., a Texas Corporation; and DOES 1 through 100, inclusive

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

GREGORY PITSCH, an individual

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is: **Alameda County Superior Court**
(El nombre y dirección de la corte es):

Hayward Hall of Justice, 24405 Amador St., Hayward, CA 94544

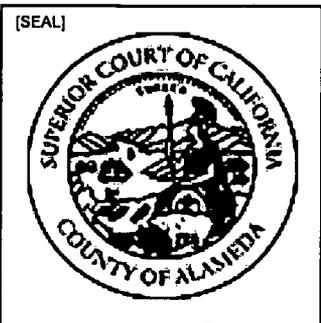
CASE NUMBER:
(Número del Caso):
26CV168166

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Jay S. Rothman & Associates, 21900 Burbank Blvd., Suite 210, Woodland Hills, CA 91367; 818-986-7870

DATE: 02/02/2026 Clerk, by Andrei Ghent, Deputy
(Fecha) Chad Finke, Executive Officer / Clerk of the Court (Secretario) A. Gospel (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).) A. Gospel
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
- by personal delivery on (date):

JAYS. ROTHMAN (SBN 49739)
JAYS. ROTHMAN & ASSOCIATES
21900 Burbank Boulevard, Suite 210
Woodland Hills, California 91367
Telephone: (818) 986-7870
Facsimile: (818) 990-3019
lawyers@jayrothmanlaw.com

ELECTRONICALLY FILED
Superior Court of California,
County of Alameda
02/02/2026 at 12:00:00 AM
By: Andrel Gospel,
Deputy Clerk

Attorneys for Plaintiff Gregory Pitsch

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

GREGORY PITSCHE, an individual,
Plaintiff,

vs.

TESLA, INC., a Texas Corporation; and
DOES 1 through 100, inclusive,
Defendants.

Case No. **26CV168166**

COMPLAINT FOR DAMAGES

1. Constructive Wrongful Termination (Cal. Govt. Code §§ 12900, et seq.)
2. Constructive Wrongful Termination in Violation of Public Policy
3. Sexual Harassment, Discrimination & Retaliation (Cal. Govt. Code § 12940(j) et. seq.)
4. Intentional Infliction of Emotional Distress
5. Unfair Competition (Cal. Bus. & Prof. Code § 17200, et seq.)

[DEMAND FOR JURY TRIAL]

Gregory Pitsch, Plaintiff, ("PLAINTIFF") hereby complains against TESLA, INC., DEFENDANTS, and each of them, and alleges as follows:

GENERAL ALLEGATIONS

1. This is an action for violation of California's employment and wage and hour laws. PLAINTIFF alleges that DEFENDANT, Tesla, Inc., by and through any sole proprietors, owners, shareholders, officers, directors, members and managing agents, and alter egos, and DOES 1 Through 100, inclusive "DEFENDANTS"):

1 2. constructively, wrongfully terminated and /or retaliated against PLAINTIFF
2 in violation of Govt. Code §§ 12900, *et seq.*;

3 3. constructively, wrongfully terminated PLAINTIFF'S employment in
4 violation of important public policies of the State of California, as set forth and
5 established by California employment statutes and case law;

6 4. subjected PLAINTIFF to sexual harassment, discrimination and retaliation,
7 in violation of Cal. Govt. Code §§ 12940(k) *et seq.*;

8 5. intentionally inflicted severe emotional distress on PLAINTIFF;

9 6. violated California's Unfair Competition Law, Business & Professions Code
10 §§ 17200, *et seq.* (the "UCL");

11 7. PLAINTIFF filed a claim with the California Civil Right Department
12 ("CRD"), formerly known as the Department of Fair Employment and Housing
13 ("DFEH"), pursuant to California Government Code section 12965(b) and the California
14 Fair Employment and Housing Act ("FEHA"). PLAINTIFF filed such a claim in a timely
15 fashion and received a "right-to-sue" letter. Attached as Exhibit "A" and incorporated
16 herein by reference is a true and correct copy of the claim against DEFENDANTS.
17 PLAINTIFF has thus exhausted all administrative remedies and fulfilled all
18 administrative prerequisites.

19 8. Venue is proper in this Court because the DEFENDANTS do substantial
20 business in Alameda County, California.

21 THE PARTIES

22 9. Gregory Pitsch is, and at all times mentioned herein was a competent adult
23 residing in the State of California.

24 10. PLAINTIFF is informed and believes, and based thereon alleges, that
25 DEFENDANTS were, at all times relevant herein, the owner, shareholder, sole proprietor,
26 superintendent, officer, director, manager, and managing agent of DEFENDANTS.

27 11. PLAINTIFF is informed and believes, and based thereon alleges, that
28 Defendant, Tesla, Inc., is a Texas Corporation purportedly authorized to do business

1 within the State of California with its principal place of business located in Alameda
2 County, California.

3 12. DEFENDANTS are subject to Labor Code and other California law
4 including, but not limited to, Cal. Bus. & Prof. Code sections 17200, *et seq.*, and the
5 applicable Wage Order(s) issued by the Industrial Welfare Commission.

6 13. At all times herein mentioned, DEFENDANTS participated in the doing of
7 the acts and omissions herein alleged, were acting within the purpose, course and scope
8 of said agency and /or employment to have been done by the named DEFENDANTS; and
9 furthermore, the DEFENDANTS, and each of them, were the agents, managing agents,
10 servants, employees, alter-egos, co-conspirators, joint-venturers, partners, successors in
11 interest and predecessors in interest of each of the other DEFENDANTS.

12 14. At all times herein mentioned, DEFENDANTS were acting within the
13 purpose, course and scope of said agency and /or employment so as to invoke vicarious
14 liability and *respondeat superior* liability among other theories of liability to hold
15 DEFENDANTS liable and responsible for the injuries and damages to PLAINTIFF.

16 15. At all times herein mentioned, DEFENDANTS were members of and
17 engaged in a joint venture, partnership and common enterprise, and acting within the
18 purpose, course and scope of, and in pursuit of, said joint venture, partnership and
19 common enterprise.

20 16. At all times herein mentioned, the acts and omissions of various
21 DEFENDANTS contributed to the various acts and omissions of each and all of the other
22 DEFENDANTS in proximately causing the injuries and damages as herein alleged.

23 17. At all times herein mentioned, DEFENDANTS, including all
24 DEFENDANTS' managing agents, officers and directors, had advanced knowledge of
25 and /or ratified each and every act or omission complained throughout this complaint.
26 At all times relevant herein, DEFENDANTS and /or their managing agents, officers or
27 directors committed and /or participated in the wrongful acts and omissions complained
28 of throughout this complaint or ratified such acts and omissions. At all times herein

1 mentioned, DEFENDANTS aided and abetted the acts and omissions of each and all of
2 the other DEFENDANTS in proximately causing the damages as herein alleged.

3 18. PLAINTIFF is informed and believes and thereon alleges that at all times
4 herein mentioned DEFENDANTS and DOES 1 through 100, are and were individuals,
5 sole proprietorships, corporations, business entities, persons, and partnerships, licensed
6 to do business and /or actually doing business in the State of California.

7 19. PLAINTIFF is unaware of the true names and capacities, whether informed
8 and believes and thereon alleges that at all times herein mentioned DEFENDANTS and
9 DOES 1 through 100, are and were individual, corporate, associate, or otherwise, of the
10 DEFENDANTS sued as DOES 1 through 100, inclusive. They are unknown to
11 PLAINTIFF and therefore sues them by such fictitious names. PLAINTIFF will amend
12 this complaint to allege their true names and capacities when they become known to
13 PLAINTIFF. PLAINTIFF is informed and believes, and thereon alleges; that DOES 1
14 through 100, inclusive, are indebted to PLAINTIFF as hereinafter alleged, and that
15 PLAINTIFF'S rights against such fictitiously named DEFENDANTS arise from such
16 indebtedness.

17 20. PLAINTIFF is informed and believes and on that basis alleges that each
18 Defendant sued in this action, including each Defendant sued by the fictitious names
19 DOES 1 through 100, inclusive, is responsible and liable in some manner for the
20 occurrences, controversies and damages alleged below.

21 21. All references to "Defendant", "Defendants", "DEFENDANT",
22 "DEFENDANTS", "company", "company's", "employer" or any similar language,
23 whether singular or plural, shall mean "DEFENDANTS, and each of them" when used
24 throughout this Complaint.

25 SPECIFIC ALLEGATIONS

26 22. DEFENDANTS employed PLAINTIFF from on or about January of 2022
27 through May 27, 2023, as a Material Handler.

28 23. During PLAINTIFF'S employment, he regularly accessed the wireless

1 internet on premises on his phone. As a result, his phone was vulnerable to attack from
2 malicious software used by other employees to spy on their fellow employees, looking for
3 embarrassing content to use to amuse themselves.

4 24. On one occasion, PLAINTIFF'S phone was invaded by this malware and
5 other employee came into possession of a private photo depicting PLAINTIFF engaged in
6 oral sex with another male. PLAINTIFF is married to a woman.

7 25. For about eight months after this intrusion and theft of PLAINTIFF'S private
8 photo, the photo was passed around to many employees, and PLAINTIFF was subjected
9 to constant sexual harassment from those employees.

10 26. PLAINTIFF faced comments like, "ass boy" and "faggot" as well as gagging
11 sounds. This occurred on the work premises, as well as during transportation to the
12 premises.

13 27. PLAINTIFF complained to DEFENDANTS' Transportation Department and
14 Human Resources about the sexual harassment, and made complaints to employees Scott
15 Huerte, Michael De Jesus and Jacob Crites.

16 28. PLAINTIFF made constant complaints and pleas for help at least as far back
17 as December 2023.

18 29. Despite PLAINTIFF'S constant complaints, reports and pleas for assistance;
19 nobody in DEFENDANT'S employ did anything to help PLAINTIFF and did nothing to
20 stop the sexual harassment he faced.

21 30. Ultimately, PLAINTIFF was left with no choice but to resign his position
22 and seek relief.

23 31. As set forth above, and throughout this complaint, DEFENDANTS engaged
24 in various acts of unfair competition and unlawful and unfair business practices as
25 defined in the UCL, Cal. Bus. & Prof. Code §§17200, *et seq.*

26 32. PLAINTIFF is informed and believes, and based thereon alleges, that
27 DEFENDANTS have engaged in other illegal and wrongful acts, which are currently
28 unknown to PLAINTIFF. Upon discovery of such acts, PLAINTIFF will amend this

1 complaint to allege these unknown illegal and wrongful acts and omissions committed by
2 DEFENDANTS.

3 CAUSES OF ACTION

4 First Cause of Action

5 Constructive Wrongful Termination

6 (Cal. Govt. Code §§ 12900 *et seq.*)

7 (By PLAINTIFF Against All DEFENDANTS)

8 33. PLAINTIFF incorporates by reference and realleges the above paragraphs as
9 though set forth fully herein.

10 34. This cause of action arises under the public policies of the State of California
11 and the United States, and DEFENDANTS' retaliation against PLAINTIFF and ultimate
12 termination of their employment was in violation of such public policies, including those
13 set forth in statutes and regulations prohibiting discrimination, harassment and
14 retaliation or complaints about violations of the FEHA and /or Labor Code, including, but
15 not limited to the California Fair Employment and Housing Act, the California Labor
16 Code, statutes and regulations prohibiting gender-based and /or disabilities arising from
17 workplace injuries, discrimination /harassment /retaliation, and statutes and regulations
18 prohibiting employers from discriminating /harassing /retaliating employees who seek a
19 safe work environment, seek to be free from harassment in the workplace, to time off to
20 attend to criminal proceeding matters and to have complaints thereto properly addressed
21 by the employer.

22 35. At all times mentioned herein, *Gov. Code* section 12940 *et seq.* were in full
23 force and effect and were binding on DEFENDANTS. These sections require
24 DEFENDANTS, and each of them, to refrain from discriminating against employees in
25 terms, conditions or privileges of employment on the basis of a protected class.

26 36. As a direct and proximate result of DEFENDANTS' conduct as set forth
27 above, PLAINTIFF'S emotional well-being has substantially suffered and will continue to
28 suffer; PLAINTIFF has experienced and continues to experience severe emotional

1 distress, in an amount to be proven at trial. PLAINTIFF alleges that they have and will
2 continue to suffer substantial losses in earnings, other employment opportunities,
3 employment benefits and other damages, the precise amounts to be proven at trial.

4 Second Cause of Action

5 Constructive Wrongful Termination in Violation of Public Policy

6 (By PLAINTIFF Against All DEFENDANTS)

7 37. PLAINTIFF incorporates by reference and realleges the above paragraphs as
8 though set forth fully herein.

9 38. This cause of action arises under the public policies of the State of California
10 and the United States, and DEFENDANTS' retaliation against PLAINTIFF and ultimate
11 termination of their employment was in violation of such public policies, including those
12 set forth in statutes and regulations prohibiting discrimination, harassment and
13 retaliation or complaints about violations of the FEHA and /or Labor Code, including, but
14 not limited to the California Fair Employment and Housing Act, the California Labor
15 Code, statutes and regulations prohibiting gender-based and /or disabilities arising from
16 workplace injuries, discrimination /harassment /retaliation, and statutes and regulations
17 prohibiting employers from discriminating /harassing /retaliating employees who seek a
18 safe work environment, seek to be free from harassment in the workplace, to time off to
19 attend to criminal proceeding matters and to have complaints thereto properly addressed
20 by the employer.

21 39. As a direct and proximate result of DEFENDANTS' conduct as set forth
22 above, PLAINTIFF'S emotional well-being has substantially suffered and will continue to
23 suffer; PLAINTIFF has experienced and continues to experience severe emotional
24 distress, in an amount to be proven at trial. PLAINTIFF alleges that they have and will
25 continue to suffer substantial losses in earnings, other employment opportunities,
26 employment benefits and other damages, the precise amounts to be proven at trial.

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1 Third Cause of Action

2 Sexual Harassment, Discrimination and Retaliation

3 (Cal. Govt. Code §§ 12940(j) *et seq.*)

4 (By PLAINTIFF Against All DEFENDANTS)

5 40. PLAINTIFF incorporates by reference and realleges the above paragraphs as
6 though set forth fully herein.

7 41. PLAINTIFF was subjected to sexual harassment and retaliation and/or
8 discrimination as set forth herein. DEFENDANTS discharged, refused to hire, and/or
9 otherwise committed an adverse employment action against PLAINTIFF.

10 42. PLAINTIFF'S protected status was a motivating reason for the discharge,
11 refusal to hire, and/or other adverse employment action.

12 43. PLAINTIFF was harmed by DEFENDANTS' actions set forth herein, and
13 DEFENDANTS' constructive discharge, and/or other adverse employment action as to
14 PLAINTIFF was a substantial factor in causing PLAINTIFF'S harm.

15 Fourth Cause of Action

16 Intentional Infliction of Emotional Distress

17 (By PLAINTIFF Against All DEFENDANTS)

18 44. PLAINTIFF alleges and incorporates by reference herein all allegations set
19 forth in all previous paragraphs of the Complaint.

20 45. The acts described in this complaint, specifically in the Statement of Facts,
21 constitute outrageous conduct by DEFENDANTS. The ratification of said acts by
22 DEFENDANTS, and each of them, is also outrageous. When DEFENDANTS committed
23 the acts described in this Complaint, they did so deliberately and intentionally to cause
24 PLAINTIFF severe emotional distress. DEFENDANTS' conduct in confirming and
25 ratifying that conduct was done with knowledge that PLAINTIFF'S distress would
26 thereby increase, and was done with wanton and reckless disregard of the probability of
27 causing PLAINTIFF emotional distress.

28 46. Such conduct by DEFENDANTS, and each of them, exceeds all normal risks

1 of the employment relationship.

2 47. The above acts of defendants and each of them caused PLAINTIFF severe
3 emotional distress, anxiety, sleeplessness, and were outrageous and beyond the scope of
4 employment. As a direct, proximate and foreseeable result of the aforesaid conduct of the
5 DEFENDANTS, and each of them, PLAINTIFF suffered damages and injuries set forth
6 below.

7 48. As a result of the aforesaid acts of DEFENDANTS, PLAINTIFF has become
8 mentally upset, distressed and aggravated. PLAINTIFF claims general damages for such
9 mental distress and aggravation in an amount of which will be proven at time of trial.

10 49. As a proximate result of the conduct complained of herein, PLAINTIFF
11 suffered and continues to suffer embarrassment, humiliation, emotional distress, mental
12 anguish and severe nervous system shock, and thereby sustained serious injuries to
13 physical and mental health, strength and activity, causing extreme physical and
14 emotional pain, all to PLAINTIFF'S general damage in such amount as may be proven.
15 Said amount is within the jurisdiction of the Superior Court of the State of California.

16 50. As a direct and proximate result of the aforementioned wrongful conduct of
17 DEFENDANTS, and each of them, PLAINTIFF incurred medical expenses, the exact
18 nature and extent of which are unknown to PLAINTIFF at this time and PLAINTIFF will
19 ask leave of the Court to amend this Complaint in this regard when the same have been
20 ascertained.

21 51. As a direct and proximate result of the aforementioned wrongful conduct of
22 DEFENDANTS, and each of them, PLAINTIFF will be required to incur additional future
23 medical expenses all to her further damage in an amount to be proven at trial.

24 Fifth Cause of Action

25 Unfair Competition

26 (Cal. Bus. & Prof Code §§ 17200 *et seq.*)

27 (By PLAINTIFF Against All DEFENDANTS)

28 52. PLAINTIFF incorporates by reference and realleges the above paragraphs as

1 though set forth fully herein.

2 53. Shareholders, owners, directors, officers and /or sole proprietors of
3 DEFENDANTS misappropriated and converted to themselves for their individual
4 advantage the unpaid wages and other monies owed to PLAINTIFF as alleged
5 throughout this complaint.

6 54. As a result of DEFENDANTS' unfair business practices, DEFENDANTS
7 have reaped unfair benefits and illegal profits at the expense of PLAINTIFF, and
8 members of the public. DEFENDANTS' use of such unfair business practices constitutes
9 unfair competition and provides an unfair advantage over DEFENDANTS' competitors.
10 DEFENDANTS should be made to disgorge their ill-gotten gains and restore such monies
11 to PLAINTIFF.

12 55. DEFENDANTS' unfair business practices entitle PLAINTIFF to seek
13 preliminary and permanent injunctive relief, including but not limited to orders that
14 DEFENDANTS account for, disgorge and restore to PLAINTIFF the compensation
15 unlawfully withheld and for which DEFENDANTS were unjustly enriched.

16 PRAYER

17 WHEREFORE, PLAINTIFF hereby prays that the Court enter judgment in their
18 favor and against DEFENDANTS and DOES 1 Through 100, inclusive, collectively
19 DEFENDANTS, and each of them, as follows:

- 20 (a) For damages according to proof;
- 21 (b) For payment of all statutory obligations and penalties as required by law;
- 22 (c) For an accounting, under administration of PLAINTIFF and subject to Court
23 review;
- 24 (d) A declaration of the rights and interests of the parties;
- 25 (e) For prejudgment interest at the legal rate;
- 26 (f) For attorney's fees and costs;
- 27 (g) For costs of suit incurred herein;

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(h) For such further relief as the Court may deem appropriate.

Dated: February 1, 2026

JAY S. ROTHMAN & ASSOCIATES



JAY S. ROTHMAN
Attorney for Plaintiff Gregory Pitsch

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of the foregoing causes of action.

Dated: February 1, 2026

JAY S. ROTHMAN & ASSOCIATES



JAY S. ROTHMAN
Attorney for Plaintiff Gregory Pitsch

EXHIBIT A



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannon Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

January 28, 2026

Jay S. Rothman
JAY S. ROTHMAN & ASSOCIATES, 21900 Burbank Blvd., Ste. 210
Woodland Hills, CA 91367

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202601-33309528
Right to Sue: Pitsch / TESLA, INC.

Dear Jay S. Rothman:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

January 28, 2026

RE: Notice of Filing of Discrimination Complaint
CRD Matter Number: 202601-33309528
Right to Sue: Pitsch / TESLA, INC.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



Civil Rights Department

651 Bannon Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

KEVIN KISH, DIRECTOR

January 28, 2026

Gregory Pitsch

c/o JAY S. ROTHMAN & ASSOCIATES, 21900 Burbank Boulevard, Suite 210
Woodland Hills, CA 91367

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202601-33309528
Right to Sue: Pitsch / TESLA, INC.

Dear Gregory Pitsch:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective January 28, 2026 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannon Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Gregory Pitsch

CRD No. 202601-33309528

Complainant,

vs.

TESLA, INC.

Kiran S. Lopez, 31353 Huntwood Avenue
Hayward, CA 94544

Respondents

1. Respondent **TESLA, INC.** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant **Gregory Pitsch**, resides in the City of **Woodland Hills**, State of **CA**.

3. Complainant alleges that on or about **May 27, 2023**, respondent took the following adverse actions:

Complainant was harassed because of complainant's sexual orientation, sexual harassment.

Complainant was discriminated against because of complainant's sexual orientation, other and as a result of the discrimination was forced to quit, asked impermissible non-job-related questions.

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment and as a result was forced to quit, asked impermissible non-job-related questions.

Additional Complaint Details: DEFENDANTS employed PLAINTIFF from on or about January of 2022 through May 27, 2023, as a Material Handler.

1 During PLAINTIFF'S employment, he regularly accessed the wireless internet on premises
2 on his phone. As a result, his phone was vulnerable to attack from malicious software used
3 by other employees to spy on their fellow employees, looking for embarrassing content to
4 use to amuse themselves.

5 On one occasion, PLAINTIFF'S phone was invaded by this malware and other employee
6 came into possession of a private photo depicting PLAINTIFF engaged in oral sex with
7 another male. PLAINTIFF is married to a woman.

8 For about eight months after this intrusion and theft of PLAINTIFF'S private photo, the photo
9 was passed around to many employees, and PLAINTIFF was subjected to constant sexual
10 harassment from those employees.

11 PLAINTIFF faced comments like, "ass boy" and "faggot" as well as gagging sounds. This
12 occurred on the work premises, as well as during transportation to the premises.

13 PLAINTIFF complained to DEFENDANTS' Transportation Department and Human
14 Resources about the sexual harassment, and made complaints to employees Scott Huerte,
15 Michael De Jesus and Jacob Crites.

16 PLAINTIFF made constant complaints and pleas for help at least as far back as December
17 2023.

18 Despite PLAINTIFF'S constant complaints, reports and pleas for assistance; nobody in
19 DEFENDANT'S employ did anything to help PLAINTIFF and did nothing to stop the sexual
20 harassment he faced.

21 Ultimately, PLAINTIFF was left with no choice but to resign his position and seek relief.
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1 VERIFICATION

2 I, **Jay Rothman**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based on
4 information and belief, which I believe to be true. The matters alleged are based on
5 information and belief, which I believe to be true.

6 On January 28, 2026, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

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Woodland Hills, CA