

26 SEP 24 PM 3:13

FILE KERN CO. CLERK OF
THE BD. OF SUPERVISORS
BY _____ DEPUTY

Kathleen Krause, Agent for Service for:
County of Kern, Employers' Training Resource
1115 TRUXTUN AVE 5TH FL
BAKERSFIELD, CA 93301-4629

CERTIFIED MAIL: 9589 0710 5270 3237 9181 69

BY ORDER OF THE BD/SUPV

Referred To

HK
County Counsel
12 pgs

Copies Furnished

Risk Management
Mailed

Date

9-24-26

Clerk of the Board of Supervisors

By

[Signature], Deputy



Civil Rights Department

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

September 22, 2026

Via Certified Mail

Agent of Service:

Kathleen Krause, Agent for Service for: County of Kern, Employers' Training Resource
1115 Truxtun Ave, 5th FL
Bakersfield, CA 93301-4629

Respondent(s):

County of Kern, Employers' Training Resource
1600 E Belle Terrace
Bakersfield, CA 93309

RE: Notice of Filing of Discrimination Complaint - Response Requested
Case Number: 202604-34531612
EEOC Number: 37A-2026-02995
Case Name: Varnado / County of Kern, Employers' Training Resource
Case Type: Employment

To All Listed Respondent(s):

Enclosed is a copy of a complaint filed with the Civil Rights Department (CRD). The enclosed complaint, which was filed under Government Code section 12960, alleges unlawful discrimination and names you as a Respondent or Co-Respondent.

The CRD independently investigates and assesses the facts and legal issues in each case. The CRD uses the facts obtained through its investigation to determine if there is reasonable cause to believe that a law the department enforces has been violated.

Government Code Section 12940, subdivision (h), prohibits any retaliatory action against a person because he or she has filed a complaint, has opposed any practices forbidden under the Fair Employment and Housing Act, or has assisted in any proceeding before the CRD.

California Government Code section 12946 requires that all employment records (or union membership and referral records) be retained for a minimum of four (4) years. When a discrimination complaint has been served, the records must be kept until the CRD closes its inquiry and until any resulting lawsuit or appeal has been terminated.

This complaint has also been filed with the U. S. Equal Employment Opportunity Commission (EEOC). You need not reply to the EEOC unless that agency specifically requests a response.

You must submit a response to the questions below and to the supplemental questions attached within thirty (30) calendar days of the date of this letter.

1. State the legal name of your business and any other name(s) under which you do or have done business in California.
2. State your business address. Please note that you are required to notify the CRD in writing of any change of address and the effective date of such change while the complaint is under investigation and throughout any administrative adjudication. (California Code of Regulations, title 2, section 11013).
3. State type of legal business entity (i.e., corporation, partnership, limited partnership, sole proprietorship, etc.).
4. Does your company have a current contract(s) for the provisions of goods, services or public works with the State of California or receive federal funds? If so, name the awarding agency.
5. State the number of employees your business employs.
6. Provide your response to the allegations of the complaint including the facts that support your denial(s) or affirmative defenses(s); the names, addresses, email addresses and telephone number(s) for any witnesses who have knowledge of your denials(s) or affirmative defenses(s); and any physical or electronic documents, recordings or images related to your denials(s) or affirmative defenses(s).

You can respond to this letter by:

- Using our online California Civil Rights System (CCRS). This is a three-step process:
 - Create an account for yourself at <https://ccrs.calcivilrights.ca.gov>. All you need is a valid email address and a phone number.
 - Email your assigned investigator (named below) or contact us at contact.center@calcivilrights.ca.gov and make reference to the Case #: **202604-34531612** to request that your account be associated to the complaint.
 - Log into your account. You will see the case number in your list of Open Cases. Click on Upload documents. Select Files, click on Upload New File, and select the files you wish to upload.

- Email. Send your response to your assigned investigator (named below) and to contact.center@calcivilrights.ca.gov. Include a copy of this letter and make reference to Case #: **202604-34531612**.
- US mail. Send your response to: CRD Enforcement Division, 651 Bannon Street, Suite 200, Sacramento, CA 95811. Include a copy of this letter and make reference to Case #: **202604-34531612**.

In appropriate cases, your assigned investigator may assist you in reaching an agreement to resolve this complaint. If you are interested in discussing a possible settlement of this complaint, please contact your investigator. Settlement discussions are confidential. However, discussions of facts or legal issues with you will not be considered part of a settlement discussion unless the CRD specifies in advance that a discussion is for this purpose.

Also, please be advised that the Department offers free mediation services. In appropriate cases, if you and the complainant agree to mediate and the Department approves, the complaint will be assigned to a mediator, who will contact you to schedule the mediation conference. All settlement discussions during the mediation process are confidential and not subject to disclosure. If you are interested in formal mediation, please contact the assigned investigator.

Sincerely,

John Pruett

John Pruett
Analyst II
916-708-1103
john.pruett@calcivilrights.ca.gov

Enclosures

CERTIFIED MAIL: 9589 0710 5270 3237 9181 69

SUPPLEMENTAL QUESTIONS

Complainant: Ashley Varnado

Respondent: County of Kern, Employers' Training Resource

File Date: September 11, 2026

1. Identify the person or persons designated to represent the company in this matter. Provide telephone contact number, email address, and mailing address for your representative(s).
2. Provide a statement of the employer's position with regard to the allegations contained in the complaint.
3. Provide copies of documents that support the employer's position regarding the allegations contained in the complaint.
4. Provide a description of your policy(ies) on harassment, discrimination, and retaliation. Provide a copy of any written policy and explain what steps have been taken to implement them.
5. List the names of all persons involved in making the specific decisions to which the Complainant objects. State each person's job title and responsibility as it related to the issues raised by the complaint.
6. Provide a copy of performance evaluations and disciplinary documentation for the Complainant. If evaluations are not available, provide a statement, with copies of any substantiating documentation, describing how well the Complainant performed job duties and the circumstances surrounding any disciplinary actions.
7. State the reasons Complainant was denied job development training. Provide copies of any documentation supporting your reasons for the denied training.
8. State the reasons Complainant was assigned a larger caseload than their coworkers. Provide copies of any documentation supporting your reasons for the larger caseload.
9. Describe the qualifications for the job most recently held by the Complainant. Provide a copy of any written job descriptions and job analysis for the position. If no written description exists, describe the duties, responsibilities, and minimum qualifications for hire.
10. Describe your company's practices regarding training of employees in complainant's classification and work unit. Provide copies of any written policies in effect at the time of the denied job development training.

11. Describe your company's practices regarding assignment of caseloads to employees in complainant's classification and work unit. Provide copies of any written policies in effect at the time of the assigned caseload.
12. Provide a copy of any written notice to Complainant of the assigned caseload.
13. State the reasons complainant was not hired for the Program Support Supervisor position. Provide copies of all documentation supporting your reasons for not hiring the Complainant.
14. Provide a copy of Complainant's application/resume, interview notes, and all other documentation reviewed or considered with the regard to the decision not to select the Complainant.
15. State name of the successful candidate for the position, provide date of appointment, copy of employment application/resume, interview notes and all other documents reviewed or considered with regard to the selection.
16. Describe your organization's practices with regard to the selection process used for the position in question. Provide copies of any written policies/procedures.
17. Describe the qualifications for the job in question. Provide a copy of any written job descriptions and job analysis for the position. If no written description exists, describe the duties, responsibilities, and minimum qualifications for hire.
18. Provide a copy of the eligibility or ranking of candidates for the position in question.
19. Provide a copy of your application for employment and any other forms or interview instructions used to reach a decision to offer employment to a prospective applicant. Describe how each form provided is used.
20. Identify by name all individuals interviewed for the position in question. For each individual provide copies of their application/resume, interview notes, and all other documentation reviewed or considered with regard to the selection.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****CASE NUMBER**

202604-34531612

EEOC: 37A-2026-02995

COMPLAINANT

Ashley Varnado

ADDRESS6905 Klamath Way, Apt. A
Bakersfield, CA 93309**PHONE**

(661) 472-6649

**TYPE OF DISCRIMINATION AND
LAW**

Government Code 12940

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT
ENTITY WHO DISCRIMINATED AGAINST ME**RESPONDENT(S)**County of Kern, Employers'
Training Resource**ADDRESS**1600 E Belle Terrace
Bakersfield, CA 93309**PHONE****AGENT FOR SERVICE**Kathleen Krause, Agent of
Service for County of Kern,
Employers' Training Resource**ADDRESS**1115 Truxtun Ave, 5th FL
Bakersfield, CA 93301-4629**PHONE**

(661) 868-3600

**NO. OF
EMPLOYEES**
501 or more



COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

CASE NUMBER

202604-34531612

EEOC: 37A-2026-02995

- Allegation 1 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

February 6, 2026

BECAUSE OF MY ACTUAL OR PERCEIVED

Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Denied any employment benefit or privilege

PARTICULARS

I was hired on August 8, 2016 as a Job Developer I, and I currently hold the position of Job Developer II earning \$31.62 per hour.

I believe I was denied an employment benefit or privilege in retaliation for reporting discrimination, in that I have not received the job development training necessary for my position. On or around October 8, 2025, I met with Candy Cline-Cettman, Assistant Director, and Scott Couture, Manager, and raised concerns about discrimination related to hiring. On or around October 20, 2025, I was scheduled to begin job development training for my position, but no schedule was established. In or around November 2025, I emailed Mr. Couture to ask when my training would begin. He replied that it would begin when Gloria [Last Name Unknown] returned to work. However, I still did not receive a training schedule after Gloria's return.

- Allegation 2 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

February 6, 2026

BECAUSE OF MY ACTUAL OR PERCEIVED

Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Denied hire or promotion

PARTICULARS

I believe I was denied promotion on or around February 6, 2026 in retaliation for reporting discrimination. On or around October 8, 2025, I met with Candy Cline-Cettman, Assistant Director, and Scott Couture, Manager, and raised concerns about discrimination related to hiring. In or around November 2025, I applied for a Program Support Supervisor position. On or around February 6, 2026, Mr. Couture called to notify that I was not selected for the position. However, I believe I am more experienced than the selected individual.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****CASE NUMBER**

202604-34531612

EEOC: 37A-2026-02995

- Allegation 3 -**I ALLEGE THAT I EXPERIENCED**

Retaliation

ON OR BEFORE

April 20, 2026

BECAUSE OF MY ACTUAL OR PERCEIVED

Reported or resisted any form of discrimination or harassment

AS A RESULT, I WAS SUBJECTED TO

Given additional work responsibilities or assignments

PARTICULARS

I believe I was given additional work responsibilities or assignments in retaliation for reporting discrimination, in that I was assigned a larger caseload than my coworkers. On or around October 8, 2025, I met with Candy Cline-Cettman, Assistant Director, and Scott Couture, Manager, and raised concerns about discrimination related to hiring. On or around December 19, 2025, my supervisor Rosalia [Last Name Unknown] notified me that I would be taking over coworker Brenda's caseload. On or around April 10, 2026, my new supervisor Sandra Gutierrez notified me that I would receive a new work assignment plan. On or around April 13, 2026, I met with Ms. Gutierrez and Mr. Couture about my new assignment plan and was given a new caseload. On or around April 20, 2026, I attended a case managers meeting and discovered that I had more than double the average number of cases compared to my coworkers and that my caseload had increased by 93 percent.

SIGNED UNDER PENALTY OF PERJURY

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

**SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL
REPRESENTATIVE:****DATE:**


Ashley Varnado (Sep 11, 2026 10:57:47 PDT)

09/11/2026

Ashley Varnado

Ashley Varnado

vs.

County of Kern, Employers' Training Resource

THIS PERSON (CHECK ONE)

☒ Claims to be aggrieved☐ Is filing on behalf of other person(s)

DATE OF ALLEGED VIOLATION

Earliest

Most Recent

October 20, 2025

April 20, 2026

PLACE OF ALLEGED VIOLATION

California, County of Kern

EEOC CHARGE NUMBER

37A-2026-02995

FEPA CHARGE NUMBER (if known)

202604-34531612

NOTICE OF CHARGE OF DISCRIMINATION IN JURISDICTIONS WHERE AN FEP AGENCY WILL INITIALLY PROCESS

(See EEOC "Rules and Regulations" for additional information)

YOU ARE HEREBY NOTIFIED THAT A CHARGE OF EMPLOYMENT DISCRIMINATION UNDER

- ☒ Title VII of the Civil Rights Act of 1964
- ☐ The Age Discrimination in Employment Act of 1967 (ADEA)
- ☐ The Americans with Disabilities Act of 1990 (ADA)

HAS BEEN RECEIVED BY

- ☐ The EEOC and sent for initial processing to _____
(FEP Agency)
- ☒ The CIVIL RIGHTS DEPARTMENT and sent to the EEOC for dual filing purposes.

While EEOC has jurisdiction (upon the expiration of any deferral requirement if this is a Title VII charge) to investigate this charge, EEOC may refrain from beginning an investigation and await the issuance of the Agency's final findings and orders. These final findings and orders will be given weight by EEOC in making its own determination as to whether or not reasonable cause exists to believe that the allegations made in the charge are true.

You are therefore encouraged to cooperate fully with the Agency. All facts and evidence provided by you to the Agency in the course of its proceedings will be considered by the Commission when it reviews the Agency's final findings and orders. In many instances the Commission will take no further action, thereby avoiding the necessity of an investigation by both the Agency and the Commission. This likelihood is increased by your active cooperation with the Agency.

- ☒ As a party to the charge, you may request that EEOC review the final decision and order of the above named Agency. For such a request to be honored, you must notify the Commission in writing within 15 days of your receipt of the Agency's final decision and order. If the Agency terminates its proceedings without issuing a final finding and order, you will be contacted further by the Commission. Regardless of whether the Agency or the Commission processes the charge, the Recordkeeping and Non-Retaliation provision of Title VII and the ADEA as explained on the reverse side of this form apply.

For further correspondence on this matter, please use the charge number(s) shown.

- ☐ An Equal Pay Act investigation (29 U.S.C. 209(d)) will be conducted by the Commission concurrently with the Agency's investigation of the charge.
- ☒ Enclosure: Copy of the Charge

BASIS OF DISCRIMINATION:

- ☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN ☐ AGE ☐ OTHER
- ☐ DISABILITY ☒ RETALIATION

CIRCUMSTANCES OF ALLEGED VIOLATION:

See attached complaint.

DATE

September 22, 2026

TYPED NAME/TITLE OF AUTHORIZED EEOC OFFICIAL

Christine Park-Gonzalez, Acting District Director

SIGNATURE

Christine Park-Gonzalez

INFORMATION SHEET ON CHARGES OF DISCRIMINATION

EEOC RULES AND REGULATIONS

Section 1601.15 EEOC's Procedural Regulations provides that persons charged with employment discrimination, such as yourself, may submit a statement of position or evidence with respect to the allegations contained in this charge.

The Commission's Recordkeeping and Reporting Requirements are set forth in Title 29, Code of Federal Regulations (CFR), Part 1602 (see particularly Section 1602.14 below) for the Title VII and the ADA; 29 CFR Part 1620 for the EPA; and 29 CFR Part 1627, for the ADEA. These regulations generally require respondents to preserve payroll and personnel records relevant to a charge of discrimination until disposition of the charge or litigation relating to the charge (for ADEA charges, this notice constitutes the written request set out in Part 1627 for respondents to preserve records relevant to the charge -- the records to be retained are as described in Section 1602.14, as cited below, and should be kept for the periods described in that section). Parts 1602, 1620 and 1627 also prescribe record retention periods -- generally, three years for basic payroll records and one year for personnel records. Questions regarding retention periods and the types of records to be retained should be resolved by reference to the regulations.

Section 1602.14 Preservation of records made or kept . . . Where a charge of discrimination has been filed, or an action brought by the Commission or the Attorney General, against an employer under Title VII or the ADA, the employer shall preserve all personnel records relevant to the charge or the action. The term "personnel records relevant to the charge," for example, would include personnel or employment records relating to the aggrieved person and to all other aggrieved employees holding positions similar to that held or sought by the aggrieved person and application forms or test papers completed by an unsuccessful applicant and by all other candidates for the same position as that for which the aggrieved person applied and was rejected. The date of "final disposition of the charge or the action" means the date of expiration of the statutory period within which the aggrieved person may bring an action in a U.S. District Court, or where an action is brought against an employer either by the aggrieved person, the Commission, or by the Attorney General, the date on which such litigation was terminated.

NOTICE OF NON-RETALIATION REQUIREMENT

Section 704(a) of Title VII, Section 4(d) of the ADEA, and Section 503(a) of the ADA provide that it shall be an unlawful employment practice for an employer to discriminate against any of his/her employees or applicants for employment, for an employment agency to discriminate against any individual, or for a labor organization to discriminate against any member thereof or applicant for membership, because s/he has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this title. The Equal Pay Act of 1963 contains similar provisions. Additionally, Section 503(b) of the ADA prohibits coercion, intimidation, threats, or interference with any person because s/he has exercised or enjoyed, or aided or encouraged others in their exercise of employment, or rights under the Act.

Persons filing charges of discrimination are advised of these Non-Retaliation Requirements and are instructed to notify EEOC if any attempt at retaliation is made. Note that the Civil Rights Act of 1991 provides substantial additional monetary provisions to remedy instances of retaliation or other discrimination, including for example, to remedy the emotional harm caused by on-the-job harassment.

NOTICE REGARDING PRESENTATION BY ATTORNEYS

Although it is not necessary that you be represented by an attorney while we handle this charge, you have a right, and may wish to retain an attorney to represent you. If you are represented by an attorney we request that you provide the Commission with your attorney's name, address, and telephone number, and that you ask your attorney to write to the Commission confirming such representation.

Reverse side of EEOC Form 131/131-A (Test 10/94)

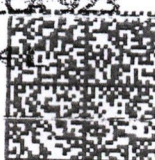


State of California
Civil Rights Department
Enforcement Division
651 Bannon Street, Suite 200
Sacramento, CA 95811
www.cacivilrights.ca.gov



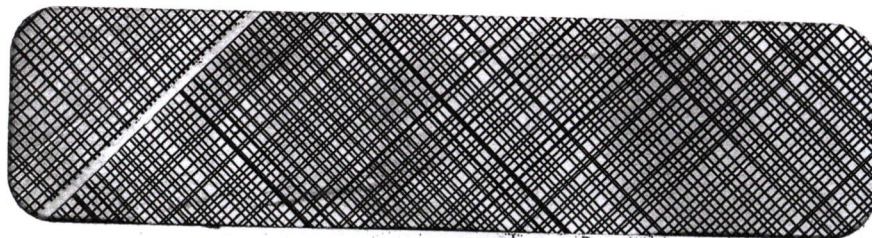
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