



**Kerry Garvis Wright**  
T 310.553.3000  
D 310.556.7889  
kgarviswright@glaserweil.com

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**CONFIDENTIAL**

**BY EMAIL**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA  
700 North Alameda Street  
Los Angeles, California 90012  
Attn: Henry Torres, Jr., Esq.  
Assistant General Counsel  
htorres@mwdh2o.com

Re: *Adel Hagekhalil vs. Metropolitan Water District of Southern California, et al.*  
**NOTICE OF CLAIMS PURSUANT TO GOVERNMENT CODE SECTION 910, ET  
SEQ.**

To Metropolitan Water District of Southern California:

Pursuant to Government Code section 910, et seq., this constitutes notice of claims on behalf of Adel Hagekhalil (“Mr. Hagekhalil” or “Claimant”) against the Metropolitan Water District of Southern California (“Metropolitan” or “the District”) and others. These claims arise out of the termination of Mr. Hagekhalil’s employment with the District and include but are not limited to unlawful retaliation and racial, ethnic, and religious discrimination and harassment.

**Introduction**

Mr. Hagekhalil’s termination as the General Manager of the Metropolitan Water District of Southern California (“Metropolitan” or “the agency”) on January 29, 2025, was unlawful and Mr. Hagekhalil was otherwise subjected to other unlawful actions throughout his tenure as Metropolitan’s General Manager. Mr. Hagekhalil’s termination was the culmination of a well-orchestrated series of actions by Metropolitan and its agents in retaliation against Mr. Hagekhalil for his protected activity, including but not limited to responding to and addressing workplace harassment and retaliation as **Redacted** the Shaw Law Group **RedactedRedacted** in 2021, raising concerns about Metropolitan’s **RedactedRedacted** refusal to abide by and









complaint and the ongoing investigation, apparently hoping the media attention would pressure the Board to remove Mr. Hagekhalil as General Manager.

***More Retaliation Against Mr. Hagekhalil and Anti-Arab and Anti-Muslim Animus Colors the Agency's Action***

**Redacted** retaliatory actions—which were authorized, directed, and/or ratified by Metropolitan—continued and **Redacted** plan to have Mr. Hagekhalil removed gained traction among certain Board members, including those who harbored animus against Arabs and Muslims. Upon information and belief, certain Board members lobbied one other unlawfully in violation of the Brown Act to garner support for investigating Mr. Hagekhalil. One Board member told other Board members that they would “stir the pot” against Mr. Hagekhalil. That Board member is the same Board member who was investigated for using openly racial slurs against Mr. Hagekhalil and other Arab and Muslim Americans in the course and scope of her role as a Metropolitan Board member. That Board member said such abhorrent things as, “*When are we going to get rid of these refugees?*” and “*When are we going to hire someone whose name we can pronounce?*”—references to Mr. Hagekhalil and his fellow Arab and Muslim American Chief of Staff, Mohsen Mortada.

That same Board member lobbied other Board members to investigate Mr. Hagekhalil, including a then newly-appointed Board member, who led the investigation of Mr. Hagekhalil into the hiring of the Arab and Muslim American Chief of Staff. Revealing his racial animus against Muslim Americans, this Board member suggested that the investigator determine whether Mr. Hagekhalil and the Chief of Staff attend the same church, as if that would be pertinent to the investigation. Other Board members also made inappropriate and denigrating remarks about Muslims, once threatening Mr. Hagekhalil that “when I am done with you, you will be drinking”—an obvious reference to the Muslim faith’s prohibition against alcohol consumption.

***Mr. Hagekhalil Opposes the Board Chairs and Other Board Members' Conflicts of Interest and Refuses to Cede to the Demands to Enter into Contracts Without Abiding by Proper Protocols***

Between in or about 2023 and 2024, **RedactedRedactedRedacted** demanded that Mr. Hagekhalil provide Metropolitan work to their business associates and friends, without following proper protocols, such as submitting proposals in response to requests for proposals. Mr. Hagekhalil appropriately refused and referred these companies to the professional team at Metropolitan to help them submit proposals to compete for the work in compliance with proper Metropolitan procedure. By way of example, **RedactedRedacted**, the owner of an engineering firm, told Metropolitan staff that “they don’t submit proposals,” “they just get work” through their

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**Redacted** connections. **RedactedRedacted** were upset that the bond companies hired to sell Metropolitan bonds were not of a certain ethnicity and demanded that Metropolitan work with only those specific ethnicity-owned bond companies and particularly ones owned by their business associates and friends. Mr. Hagekhalil did not cede to this demand, which would have circumvented the competitive proposal process for Metropolitan work.

**RedactedRedacted** similarly demanded special favors from Mr. Hagekhalil to support their special and financial interests. For example, certain Board members insisted on many occasions that Metropolitan contract with a certain private company to buy its pipeline in the desert to convey water and to enter into agreement with it for stored water. Mr. Hagekhalil refused and insisted on following the proper Metropolitan process and conducting the necessary analysis, which caused the Board members to become very upset with Mr. Hagekhalil.

**RedactedRedacted** also used Metropolitan to support their own personal businesses and obtain financial and other benefits. By way of example, Board members demanded that Mr. Hagekhalil attempt to influence the labor union and its president to withdraw their opposition to a certain state bill that would benefit their personal businesses and clients. Mr. Hagekhalil appropriately refused to interfere, causing the **Redacted** to become angry and go directly to the union leadership to pressure them to withdraw the union opposition to the bill. At about the same time, a certain Board member asked Mr. Hagekhalil to convince the union to not oppose the contract with a company that had direct business relationship with the Board member. Mr. Hagekhalil appropriately refused, given the obvious conflict of interest and ethics concerns. The Metropolitan Board ultimately approved the contract with that company notwithstanding the union's opposition, in February 2025, *just one month after Mr. Hagekhalil was wrongfully terminated*. Mr. Hagekhalil obviously was an obstacle to these Board members and their demands to cater to their special interests and financially reward their business interests and those of their business associates and friends.

**Still More Retaliation: Redacted Lodges a Stale, But Baseless Complaint Against Mr. Hagekhalil; Redacted, and RedactedRedacted Collude to Advance Baseless Claims by Redacted Against Mr. Hagekhalil**

Having failed in **Redacted** many prior efforts to unseat Mr. Hagekhalil as Metropolitan's General Manager, **Redacted** lodged a complaint against Mr. Hagekhalil. And, although Mr. Hagekhalil was notified of the complaint on June 5, 2024, it is undisputed that had lodged **Redacted** complaint and was in direct communication with the investigator as early as March 2024—at least three months before Mr. Hagekhalil was given notice of the complaint. The June 5 notice to Mr. Hagekhalil was timed by the agency to coincide with the trumped-up complaint made against Mr. Hagekhalil by **Redacted**, which was





Monday, Jun 10 • 7:47 PM

FABULOUS letter!!

Well written, factual.

I'm part of the  
"conspiracy", eh?? 😊

Thank YOU 🙏 .

Thursday, Jun 13 • 3:52 PM

Okay my Sister, step  
one..

Ok, I'm worried!!!

Thank you!

Administrative leave  
pending investigation

So, is he coming  
back?

For 90 days he's going  
at administrative  
leave, then we'll see  
for sure 😊

Thank you!

Keep me posted. I  
have staff who have  
been emailing /texting  
me hoping for a new  
day.

Thursday, Jun 13 • 5:52 PM

Top manager of  
California's largest  
water supplier  
accused of sexism  
and harassment  
<https://www.latimes.com/environment/story/2024-06-13/mwd-considers-accusations-general-manager>

📎  
Tap to load preview

### ***More Collusion, Retaliation, and Discrimination: Mr. Hagekhalil is Precipitously and Unfairly Placed on “Temporary” Administrative Leave***

On June 13, 2024, the Board precipitously and unfairly placed Mr. Hagekhalil on “temporary” administrative leave, stripping him of his duties as General Manager, locking him out of his office, and cutting off his email access. The Board forced the vote to place Mr. Hagekhalil on leave—purportedly on the basis of the manufactured complaints by **RedactedRedacted**—while Mr. Hagekhalil was traveling overseas for agency business when there were no exigent circumstances. In fact, notwithstanding the rush to place Mr. Hagekhalil on leave on June 13 (for “up to 90 days”), it would be months before Mr. Hagekhalil was contacted by an investigator. Meanwhile, **Redacted**, in the course and scope of **Redacted**, made several public statements about Mr. Hagekhalil and his leave, which were intended to and did harm Mr. Hagekhalil’s reputation. In addition, **Redacted** directly interfered and influenced the investigations against Mr. Hagekhalil and in at least one case amended the complaint. **Redacted** even called and threatened environmental leaders who publicly testified in support of Mr. Hagekhalil after Mr. Hagekhalil had wrongfully been placed on leave and otherwise exiled from the agency. And, instead of protecting the confidential investigative process, **Redacted**, alongside **Redacted** continued their retaliatory campaign to smear Mr. Hagekhalil when they directed management staff to send an official memorandum from the acting General Manager to the entire Metropolitan workforce fishing for dirt against Mr. Hagekhalil to shore up **Redacted** frivolous complaint to achieve their ultimate intended outcome of removing Mr. Hagekhalil.

Among the Board members voting on the decision to place Mr. Hagekhalil on leave were those who made overtly anti-Arab and Islamophobic statements about Mr. Hagekhalil and his Chief of Staff. Indeed, **Redacted** was being investigated for **RedactedRedactedRedactedRedactedRedactedRedactedRedactedRedacted** to refer to Mr. Hagekhalil’s Chief of Staff. That these directors were involved in decisions about Mr. Hagekhalil’s employment—from precipitously placing him on “temporary” administrative leave to whether he will continue to serve the District—was not only wrong, but also powerful evidence of unlawful racial and ethnic discrimination.

### ***The Ultimate Act of Retaliation: Mr. Hagekhalil is Terminated***

The investigation of **Redacted** complaints was deeply flawed and suffered from the same unfairness, lack of due process, and bias against Mr. Hagekhalil as the investigation into **Redacted** complaints. In the end, the allegations of **Redacted** **Redacted**—that had been published in *Politico*, *The Los Angeles Times*, and other media—**RedactedRedacted**. There was **Redacted**. There was **Redacted**. There was **RedactedRedacted**. There was **Redacted**. The **RedactedRedacted** **Redacted** of the six-month long investigation—as described by **RedactedRedacted**—



- Improving working conditions in the desert facilities, preventing harassment and favoritism in promotions and work assignments, and other reforms; and
- Refusing to provide special favors and support to Board members and senior staff for their special interests, business interests and relationships, and political agendas.

The retaliatory conduct took many forms, including but not limited to:

- Aiding and coordinating the filing of unfounded and otherwise frivolous complaints against Mr. Hagekhalil, **RedactedRedactedRedactedRedactedRedacted** **Redacted** – **RedactedRedacted** ;
- Amending complaints against Mr. Hagekhalil by Board leadership;
- Placing Mr. Hagekhalil on “temporary” administrative leave and then extending the leave without justification, while preventing Mr. Hagekhalil from performing in his role as General Manager;
- Preventing Mr. Hagekhalil from being able to adequately respond to the baseless complaints made against him, including but not limited to, by restricting his access to the District’s offices and staff and his emails, files, and other documents;
- Leaking confidential complaints, investigative reports, confidential personnel files as part of a smear campaign to cause harm to Mr. Hagekhalil’s reputation;
- Improperly colluding in violation of the Brown Act to manufacture claims and recruit complaints against Mr. Hagekhalil;
- Improperly interfering in the investigation of complaints made against Mr. Hagekhalil, blatantly defying the findings of the State Auditor, which found that the Board and the General Counsel improperly interfered in Ethics complaints; and
- Refusing to give Mr. Hagekhalil his performance evaluation (which reflected exceptional performance) and a cost of living increase, which was given to others.

Among others, Mr. Hagekhalil has claims for: (1) retaliation in violation of FEHA (Gov’t Code § 12940(h)); (2) retaliation in violation of Labor Code § 1102.5; and (3) retaliation in violation of Gov’t Code § 8547.10.

### Discrimination, Harassment, and Hostile Work Environment

Mr. Hagekhalil is proudly the first Arab and Muslim-American General Manager in Metropolitan’s 100 years of history. Regrettably, he has been subjected to unlawful discrimination and harassment on the basis of his ethnicity, race, and/or religion. When he competed for the General Manager role in 2021, he was subjected to racist behaviors by certain Board members who voted against his appointment. Since his appointment, those same Board members and others have continued to harbor ethnic, racial, and/or religious animus against Mr. Hagekhalil and have participated in making adverse

employment decisions against Mr. Hagekhalil that were motivated, in part or in whole, by such ethnic, racial, and religious animus. The Board has treated Mr. Hagekhalil far differently than his white, male predecessor, **RedactedRedactedRedacted Redacted**. The District failed to prevent such discrimination and harassment and, worse, tolerated, condoned, and ratified such unlawful conduct.

When Mr. Hagekhalil and others on his behalf complained of the discrimination, Mr. Hagekhalil was retaliated against in various ways, including but not limited to unfair and disparate treatment in how the District responded to and purported to investigate baseless complaints made against Mr. Hagekhalil.

Shockingly, Board members made overtly racist and bigoted comments about Arab and Muslim Americans on several occasions. Board leadership demeaned Mr. Hagekhalil publicly and privately for his race, religion, and ethnicity.

Among others, Mr. Hagekhalil has claims for: (1) discrimination based on ethnicity/race/religion in violation of the Fair Employment and Housing Act ("FEHA") (Gov't Code § 12940(a)); (2) failure to prevent discrimination in violation of FEHA (Gov't Code § 12940(k)); and (3) hostile work environment in violation of FEHA (Gov't Code § 12940(j)).

### Public Employees Causing the Injury, Damage, and Loss

Among others, the following have caused the injury, damage, and loss that Mr. Hagekhalil has suffered: **Redacted Redacted**, members, and **RedactedRedactedRedacted Redacted**, and **Redacted**, including but not limited to **Redacted**.

### Amount of the Claims

The amount claimed exceeds \$10,000 and will not be filed as a limited civil case. As Mr. Hagekhalil's damages greatly exceed the \$35,000 jurisdictional limit for limited civil cases.

Mr. Hagekhalil has suffered substantial economic and non-economic damages, including emotional distress damages caused by the unrelenting retaliation, discrimination, and harassment he endured. Mr. Hagekhalil has also suffered significant and irreparable harm to his personal and professional reputation, impairing his ability to obtain future employment, costing him millions of dollars in lost compensation and pension and other benefits. All told, we believe the damages will exceed \$10 million. Mr. Hagekhalil will also be entitled to his attorneys' fees and costs as the prevailing party in the litigation.

### Name and Post Office Address of Claimant

Adel Hagekhalil  
c/o Patricia L. Glaser, Esq., and Kerry Garvis Wright, Esq.  
Glaser Weil Fink Howard Jordan & Shapiro LLP  
10250 Constellation Blvd., 19<sup>th</sup> Floor  
Los Angeles, CA 90067

**Post Office Address to Which Notices Should Be Sent**

Patricia L. Glaser, Esq.  
Kerry Garvis Wright, Esq.  
Glaser Weil Fink Howard Jordan & Shapiro, LLP  
10250 Constellation Blvd., 19<sup>th</sup> Floor  
Los Angeles, CA 90067

Respectfully submitted,

*Kerry Garvis Wright*

Kerry Garvis Wright  
of GLASER WEIL FINK HOWARD JORDAN & SHAPIRO LLP

cc: Adel Hagekhalil  
Emilio Gonzales, Esq.  
Jennifer Rosner, Esq.  
Patricia L. Glaser, Esq.