



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

January 28, 2025

**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 Mr. Hagekhalil's employment with the District and include, but are not limited to unlawful retaliation and racial and ethnic discrimination.

What is described below is only a fraction of what Mr. Hagekhalil has experienced during his tenure with Metropolitan, and, as the General Manager who oversees the entire agency and is accountable to the Board, has had visibility into all of the unlawful and unethical conduct—and not just that directed toward him. Therefore, Mr. Hagekhalil expressly reserves the right to, and will, amend this notice of claims, including in particular if any further adverse employment actions are taken against him.

## Circumstances Which Give Rise to the Claims

### Retaliation

Mr. Hagekhalil has been subjected to a continued pattern of retaliation for having engaged in protected activity and otherwise blowing the whistle on conduct he reasonably believed to be unlawful and/or unethical. Mr. Hagekhalil was retaliated against for engaging in among other protected activity, the following:

- Opposing unlawful workplace retaliation as was identified by the [Redacted] and by the State Auditor;
- Insisting on compliance with the recommended disciplinary actions for the unlawful conduct identified by the [Redacted];
- Opposing those who sought to undermine investigations, [Redacted];
- Changing Human Resources leadership, [Redacted] for other management decisions in the best interest of the District;
- Supporting the Ethics Office in the fulfillment of its duties;
- Opposing certain staff and Board members who had clear conflicts of interests and attempted to steer Metropolitan action in furtherance of their [Redacted];
- 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 [Redacted] complaints against Mr. Hagekhalil, [Redacted];
- 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 [Redacted] 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 charges and recruit complaints against Mr. [Redacted];
- 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 by such ethnic, racial, and religious animus. The Board has treated Mr. Hagekhalil far differently than his—white, male—predecessor, [Redacted] District failed to prevent such discrimination and harassment and, worse, tolerated and condoned 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 [Redacted] that were made against Mr. Hagekhalil.

Shockingly, Board members have made racist and bigoted comments about Arab and Muslim Americans on several occasions. Board leadership demeaned Mr. Hagekhalil [Redacted].

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: Board members, [Redacted], and [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 discrimination, harassment, and retaliation 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, plus Mr. Hagekhalil will 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: Adan Ortega, Jr., Chair, MWD Board of Directors + Board Members  
Adel Hagekhalil  
Jennifer Rosner, Esq.  
Patricia L. Glaser, Esq.