

Harassment Prevention Training for Supervisors and Officials (AB 1661)

League of California Cities
Planning Commissioners Academy

Friday, March 13, 2026, 10:15 am



HOUSEKEEPING & REMINDERS

You MUST scan IN
AND OUT to receive
credit

You must be present for
the full two-hour training

Certificates will be
emailed to attendees to
scan in and out

To receive MCLE credit
your bar number must
be attached to your Cal
Cities profile – you can
add that anytime!

Contact Kristy Bivens
(kbivens@ca-ilg.org)
with questions or
concerns

HOUSEKEEPING & REMINDERS

The League of California Cities is committed to providing a safe and respectful environment for all participants and staff at Cal Cities events. We expect participants and staff to:

- Be considerate and respectful in your speech and actions.
- Refrain from behavior and speech that is threatening, abusive, discriminatory, or harassing.
- Be mindful of your surroundings and your fellow participants.

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- The Institute for Local Government is the non-profit training and education affiliate of the League of California Cities
- We were founded in 1955, 70 years ago, and our mission is to serve and support local government
- Our target population is the 2,500 cities, counties and special districts in California
- We provide practical and easy-to-use resources so local agencies can effectively implement policies on the ground



OUR PROGRAMS AND SERVICES



Our mission is to help local government leaders **navigate complexity, increase capacity & build trust** in their communities

AB 1661 Harassment Prevention Training for Supervisors and Officials

Cal Cities 2026 Planning Commissioners Academy

Presented by:

Pamela K. Graham, Senior Counsel
Colantuono, Highsmith & Whatley, PC

COLANTUONO
HIGHSMITH
WHATLEY, PC

Sexual Harassment Statistics

2018 International Bar Association Study:

- Sexual harassment: 1 in 3 female respondents; 1 in 14 male respondents
- Bullying: 1 in 2 females, 1 in 3 males
- Non-Reporting: 57% of bullying targets; 75% of sexual harassment targets

DISCRIMINATION/HARASSMENT/RETALIATION

California Fair Employment and Housing Act requires training for all employees on prevention of sexual harassment in the workplace, once every two years

- Required training for employers with 5 or more employees and all public agency employers

Interactive training will help you:

- Define sexual harassment
- Identify types of sexual harassment
- Identify examples of workplace behavior = sexual harassment
- Report incidents of harassment
- Take action to “cure” incidents of harassment, or avoid in the first place
- Identify and prevent abusive conduct in the workplace

Prevention of Harassment in the Workplace

Discrimination and harassment in the workplace create low morale, an uncomfortable and stressful work environment, resulting in a loss of job performance, high turnover and absenteeism.

It is also against the law and can result in personal and municipal liability.

Harassment Prohibited Under Federal Law

Harassment when based on a protected classification is a form of discrimination

Title VII of Civil Rights Act of 1964

- 42 U.S.C. § 2000e et seq. prohibits discrimination on the basis of race, color, religion, national origin, sex or participation in certain protected activities
- It also prohibits retaliation for participation in certain protected activities

Prohibited Under Federal Law

- Civil Rights Act Section 1981
 - 42 U.S.C. § 1981 provides additional protection from discrimination on the basis of race
 - All forms of discrimination on the basis of race are prohibited in all forms of private employment
- Civil Rights Act Section 1983
 - 42 U.S.C. § 1983 prohibits the deprivation of any right, privilege, or immunity secured by the U.S. Constitution or federal law
- Claims of discrimination are enforced by the Equal Employment Opportunity Commission (EEOC)

Prohibited Under State Law

Fair Employment & Housing Act (“FEHA”)

- Gov’t Code § 12920 et. seq. prohibits discrimination on the basis of any of the following: race, color, national origin, ancestry, sex, pregnancy, childbirth or related medical condition, marital status, religious creed, physical and mental disability, medical condition, genetic information, age (40 and over), sexual orientation, gender expression, reproductive health decisionmaking, or military and veteran status

Protected Groups Under FEHA

- religious creed
- race
- color
- national origin
- ancestry
- sex
- pregnancy
- childbirth or related medical condition
- marital status
- physical and mental disability
- medical condition
- genetic information
- age (40 and over)
- sexual orientation
- gender
- gender identity
- gender expression
- military and veteran status

Prohibited Under State Law, Cont'd.

“Gender expression” means a person’s gender-related appearance or behavior, whether or not stereotypically associated with the person’s sex assigned at birth.

“Gender identity” means each person's internal understanding of their gender, or the perception of a person's gender identity, which may include male, female, a combination of male and female, neither male nor female, a gender different from the person's sex assigned at birth, or transgender.

“Sex” has the same definition as provided in Government Code section 12926, which includes, but is not limited to, pregnancy; childbirth; medical conditions related to pregnancy, childbirth, or breast feeding; gender identity; and gender expression.

Prohibited Under State Law, Cont'd.

“Sex Stereotype” means an assumption about a person’s appearance or behavior, or about an individual’s ability or inability to perform certain kinds of work based on a myth, social expectation, or generalization about the individual's sex.

“Transgender” is a general term that refers to a person whose gender identity differs from the person’s sex assigned at birth. A transgender person may or may not have a gender expression that is different from the social expectations of the sex they were assigned at birth.

Prohibited Under State Law (FEHA)

- FEHA also prohibits discrimination against anyone perceived by the employer to have any of these characteristics, or to be affiliated or associated with anyone who has or is perceived to have any of these characteristics.
- FEHA applies to all public agency employers + all private employers with 5 or more employees
- FEHA is enforced by the California Department of Civil Rights (CRD)

Sample City Anti-Harassment Policy

- It is the policy of the City to provide a businesslike work environment, free from all forms of employee discrimination, including incidents of harassment or retaliation.
- City policy may prohibit any harassment by or of an employee, contractor, consultant or volunteer, based on race, color, national origin, age, sex, sexual preference, gender identity, marital status, physical handicap, medical condition, veteran status, or religious affiliation.

What is Harassment?

Behavior that has the effect of humiliating, intimidating, or coercing someone

Behavior that causes the recipient to feel embarrassed, uncomfortable, or distressed

Any behavior the recipient views as unwelcome, unwanted or unsolicited, and is viewed as offensive or undesirable

Based on protected classification

Types of Harassment

Age

Racial

Religious

National
Origin

Disability

Gender

Sexual
Orientation

Sexual Harassment

What is Sexual Harassment?

Unwanted sexual advances, or
Visual, verbal, or physical conduct of a sexual nature
When:

- Submission to the conduct is made an implicit condition to employment, or
- Submission to or rejection of conduct affects employment opportunities, or
- Conduct interferes with work or creates an intimidating, offensive, or hostile work environment

Two Types of Sexual Harassment

“Quid Pro Quid”

- “This for that”
- When employment decisions are based on employee’s willingness to grant sexual favors

Hostile Environment

- Where verbal or non-verbal behavior is focused on sexuality of another person, is unwanted, and is **severe and pervasive** enough to affect a **reasonable person’s work environment**

Examples of Quid Pro Quid Sexual Harassment

- “Couch casting” (supervisor demands sexual favors in exchange for a raise, promotion, or employment opportunity)
- Supervisor disciplines a subordinate employee for ending a romantic relationship with him or her
- Supervisor changes performance expectations after subordinate employee refuses to go on a date

Hostile Work Environment

Examples of Hostile Work Environment Harassment

- Touching (patting, pinching, even hugging)
- Teasing, off-color jokes
- Leering, staring, or sexual gesturing
- Display of sexually explicit or offensive calendars, posters, drawings
- Too personal inquiries or comments about employee's body (or similar references made by supervisor about self)
- Assault
- Obsessive behavior (stalking, unwanted emails, phone calls out of context to work relationship)

Hostile Work Environment: Is it “Severe & Pervasive?”

Generally, a single incident isn't enough

- Asking a co-worker out on a date is probably not sexual harassment in and of itself (but don't keep asking)
- But what if it is your subordinate employee?
- *Fuentes v. Autozone, Inc.* 200 Cal.App.4th 1221 (2011)
- Demeaning remarks made over a 3-week period was enough

But a severe incident, especially involving physical contact can be enough

- Assault
- Being trapped in an office or automobile and being touched offensively one time can be enough

Hostile Environment: Objectively Offensive?

- The “reasonable person” standard applies when determining whether the conduct is harassment
- The intent of the alleged harasser is not relevant
- Does the conduct create an atmosphere that a reasonable person would find abusive?
 - Consider the nature, frequency, context of the conduct, and the relationship between the alleged harasser and accuser
 - Example: A football coach slaps his players on the buttocks as they head out to the field—sexual harassment?
 - Same football coach slaps his secretary on the buttocks back at the office—sexual harassment?

Fuentes v. Autozone Inc., 200 Cal.App.4th 1221 (2011)

- Ø An AutoZone employee sued for harassment under FEHA. The Court granted summary judgment for the plaintiff based on a supervisors “directive that [the plaintiff] display her buttocks to customers to increase sales, the herpes rumor, and the profane speculation about a sexual relationship.”
- Ø The harassment was sufficiently pervasive because it occurred over a period of at least three weeks. AutoZone and two employees were required to pay a total of \$183,000 to the plaintiff.

Contrast *Christian v. Umpqua Bank* with *Campbell v. Hawaii Dep't of Educ.*

- Ø In *Christian*, the plaintiff was subjected to multiple instances of harassment by a customer
- Ø In *Campbell*, the court found isolated and mild comments were not sufficient to create a hostile work environment
- Ø Courts will undertake a very fact intensive analysis, which can mean lengthy, expensive litigation

Examples of Workplace Sexual Harassment

- Harassment by a male supervisor of a female subordinate
- Harassment by co-workers based on a “hostile work environment”
- Harassment by a female supervisor of a male subordinate
- Harassment by supervisor of same sex subordinate
- Harassment of employees by non-employees (contractors, public members)
- Harassment based on supervisor’s consensual relationship with a subordinate
- Cal. Gov’t Code § 12940(j)(4)(C)—sexually harassing conduct need not be motivated by desire (effective 1-1-14)

What Would You Do?

Video Skit from YouTube

https://www.youtube.com/watch?v=Vs_oqZ-WiRdk

Liability for Sexual Harassment Under Federal Law

- Employer may be **vicariously liable** to an employee for a hostile work environment created by a supervisor with authority over the employee
- The “*Ellerth/Faragher*” defense is available to employers when a supervisor’s harassment does NOT culminate in a **tangible employment action**
- An employer may avoid vicarious liability by demonstrating reasonable preventative and corrective measures

Liability for Sexual Harassment Under Federal Law

- An employer may be **directly** liable for a hostile environment based on sexual harassment created by a victim's co-workers or other non-supervisors, if:
 - the employer knows of the harassment, and
 - fails to stop it
- Combined knowledge and inaction may be demonstrable negligence

Liability for Sexual Harassment Under FEHA

- Under state law, employers are **strictly** liable for workplace harassment by a supervisor; the principle of “vicarious liability” is irrelevant
- Still, an accuser’s own conduct may limit the damages, or bar recovery entirely, for supervisor harassment
- This “avoidable consequences” defense only limits damages, not liability

Liability for Sexual Harassment Under State Law

Employer may be liable for **non-supervisory** and **non-employees'** (customers or vendors) harassment if the employer knew or should have known of the harassment, and failed to take appropriate corrective action

Avoiding Employer Liability

- Best defense is prevention
- Anti-harassment policy
- Training to implement policy
- Take reasonable care to correct any sexually harassing behavior
 - Immediate investigation of allegations, consistent with policy
 - Avoidance of retaliation
 - Did accuser fail to take advantage of corrective opportunities offered by Employer to avoid harm?

Harassment: Will You Know It When You See It?

Employees are expected to set the example for others when it comes to appropriate workplace conduct

YouTube Video skits:

<https://www.youtube.com/watch?v=H5owCNvik0E>

At what points did you see sexual harassment in the video?

Reporting Sexual Harassment

Incidents of workplace harassment
MUST be investigated

- Harassment complaints are never handled “off the record” or “just between friends”
- The scope of an investigation will depend on the allegations

What To Do If You Observe Sexual Harassment

- **Supervisor responsibility.** Supervisors and elected officials have the responsibility to provide a workplace free from discrimination, harassment, and retaliation. In addition, they must report any complaint of discrimination, harassment, or retaliation to a superior or HR and refrain from engaging in any harassment activities.
- **Non-supervisor responsibility.** An employee has the responsibility to report any harassment they observe and to refrain from engaging in harassment. Employees should report incidents to a superior or HR. Employees may be liable for attorney fees or damages if found guilty of harassment.

Why Do People Hesitate to Report?

- Embarrassment
- Fear of reprisal
- Don't want to get the harasser in trouble
- Fear of ridicule or being perceived as weak
- Concern that nothing will be done or reporting will “make things worse”
- The person who feels a victim of harassing behavior may feel reluctant to report it, but still exhibit signs of their discomfort, such as:
 - Change in their relationship with others
 - Change in attitude
 - Change in habits
 - Change in work performance

Most City Policies Takes Complaints Seriously

- Cities do not tolerate any form of harassment
- Harassment allegations are promptly and thoroughly investigated
 - Important to document incident
 - Specific date, time, and place of incident
 - Any witnesses
 - Copies of any documentation to support
 - Remember: it is difficult to investigate generalized complaints

Investigation of Harassment Claim

- City Manager or Human Resources Officer authorizes or conducts investigation (may be conducted by third party). The investigator must interview:
 - The complainant
 - Any witnesses to the complained of conduct
 - The person or persons against whom the complaint of harassment was made
 - Any other persons necessary, as follow up in the course of the investigation
- The investigation shall be conducted in a way which ensures, to the extent feasible, the privacy of the parties involved.

Investigation of Harassment Claim, Cont'd.

- Employees are obligated to cooperate in the investigation
 - Refusal to participate in the investigation may subject an employee to discipline on the grounds of insubordination
 - Knowingly accusing someone falsely of harassing conduct or giving false or misleading information to the investigator or Personnel Officer is grounds for discipline, up to and including termination
 - Employees may not discuss their interview or the investigation with anyone else, except for their counsel or union representative

Investigation of Harassment Claim, Cont'd.

- Upon conclusion of the investigation, the Human Resources Officer shall prepare a written summary of the investigation and determine whether or not the allegations of harassment are sustained. All parties shall be notified of the investigation's outcome.
 - A copy of the written finding goes into the alleged harasser's personnel file

Investigation of Harassment Claim, Cont'd.

- If it is determined that harassment occurred, disciplinary action up to and including termination shall be taken
- Severity of the discipline depends on the severity and frequency of the offense
- Under no circumstances shall any employee retaliate in any way against any employee who has made a complaint or who has provided information as a witness to an incident of alleged harassment
- Incidents of retaliation are generally also reported and investigated

Reporting Harassment

- No one shall be subjected to recrimination or reprisal due to filing a complaint or participating in an investigation about sexual harassment. No supervisor or manager shall suppress a complaint about sexual harassment.
- In addition to the complaint procedure outlined above, employees may also file complaints with the State Department of Fair Employment and Housing (1-800-884-1684) and / or the Federal Equal Employment Opportunity Commission (1-800-669-4000).

What Are The Remedies For A Finding That The Allegation Of Harassment Was Sustained?

City must take prompt corrective action to stop the harassment

- This can take the form of training
 - Note: Periodic department-wide or even City-wide training to avoid discrimination and harassment is always a good idea as a proactive tool
- City can update its anti-discrimination policy, where necessary, and post it
- City can send memoranda to its employees reaffirming its policies prohibiting harassment and redistributing copies of these policies

After the Investigation

- City can issue generalized warnings to refrain from engaging in harassing behavior and/or retaliation, under penalty of discipline
- The supervisor may reassign employees to avoid a recurrence of harassing conduct
- Discipline of the harassing employee, up to and including termination
 - Note that supervisors who are found to have sexually harassed a subordinate may expose City to liability for their conduct
- The complainant may seek additional redress through CRD or EEOC

What Would You Do?

Video Skit from YouTube

<https://www.youtube.com/watch?v=xWiA9Z1HKgY>

Retaliation

Retaliation

1. The employee participated in a protected activity
2. The employee suffered an adverse action, and
3. There was a causal link between the protected activity and the adverse action

Adverse Employment Action

- Title VII: a reasonable employee would have found the challenged action materially adverse, meaning it may have dissuaded a reasonable worker from making or supporting a charge of discrimination
- FEHA: must materially affect the terms, conditions, or privileges of employment to be actionable. The conduct must meet the “materiality” test, which extends to “the entire spectrum of employment actions that are reasonably likely to adversely and materially affect an employee's job performance or opportunity for advancement in his or her career.”

Examples of Retaliation

Examples of retaliation include, but are not limited to:

- Shunning an employee who reports an incidence of discrimination or harassment or participates in an investigation of such a complaint
- Denying an employee a job advantage or incentive because he or she has filed past complaints or filed an action with the DFEH

Examples of Retaliation, Cont'd.

- Taking an adverse employment action against an employee as a result of their reporting an incidence of harassment
 - *Kelley v. The Conco Co's.*, 196 Cal. App. 4th 191 (2011)
- Gossiping about an employee who filed a complaint alleging harassment

Retaliation

- Fear of retaliation discourages an employee from reporting unlawful conduct and is therefore particularly insidious
- Retaliation is prohibited under federal and state law, and by city policy

Retaliation, Cont'd.

- Complaints about retaliation are handled in the same manner as complaints of discrimination or harassment
- An employee against whom a finding of retaliatory conduct has been sustained will be subject to discipline

Prevention of Abusive Conduct

- Govt. Code § 12950.1 defines “abusive conduct” as employer or employee workplace conduct which a “reasonable person” would find hostile, offensive, and unrelated to legitimate business purpose
 - Note “abusive conduct” is not a statutory violation, but we must train on it
- A single incident is not “abusive conduct” unless especially severe and egregious
- Does not need to be directed at a protected classification to be considered “abusive conduct”

Prevention of Abusive Conduct, Cont'd.

Examples:

- Repeated verbal abuse
 - derogatory remarks
 - insults
 - epithets
- Verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating
- Gratuitous sabotage or undermining of a person's work performance
- Must be malicious – i.e., intentionally hurtful

Example #1

Background: Jordan is a marketing coordinator who has been with the company for six months. Sam is Jordan's supervisor and has been with the company for five years. The marketing team of eight people often goes to lunch together on Fridays.

Example #1

The Situation: Over the past two months, the following incidents have occurred:

1. Sam frequently comments on Jordan's appearance during team meetings, saying things like "You look great today" or "That outfit really suits you," while not making similar comments to other team members.
2. At a team lunch, Sam asks Jordan about their dating life and relationship status in front of the entire group. When Jordan gives a vague answer, Sam says, "Come on, someone who looks like you must have people lined up!"
3. Sam sends Jordan occasional texts on weekends about work matters, but sometimes adds personal comments like "Hope you're having fun, wish I was there!" with winking emojis.
4. During a one-on-one meeting, Sam mentions that Jordan "has a bright future here" and suggests they should "get to know each other better" by meeting for drinks after work.
5. Jordan has started avoiding Sam when possible and feels uncomfortable but worries that saying something might damage their career prospects.

POP QUIZ!

Question #1

What behaviors are problematic in this situation?



POP QUIZ!

Answers to Question #1

- Singling out one employee for appearance-based comments
- Asking personal questions about dating life in a work setting
- Sending personal messages outside work hours
- Making comments that could be interpreted as romantic interest
- Leveraging position of power (supervisor-subordinate relationship)



POP QUIZ!

Question #2

Why might Jordan hesitate to report this?



POP QUIZ!

Answers to Question #2

- Fear of retaliation or career impact
- Power imbalance
- Uncertainty about whether the behavior "counts" as harassment
- Concern about not being believed or being seen as overreacting



POP QUIZ!

Question #3

Why might Jordan hesitate to report this?



POP QUIZ!

Answers to Question #3

- Document incidents with dates and details
- Clearly communicate that the attention is unwelcome (if comfortable doing so)
- Report to HR or another designated channel
- Know that the company has an obligation to investigate



POP QUIZ!

Question #4

What should Sam have done differently?



POP QUIZ!

Answers to Question #4

- Keep comments professional and work-focused
- Treat all team members equally
- Maintain appropriate boundaries, especially given the power dynamic
- Keep all communications professional
- Be aware of how behavior might be perceived



POP QUIZ!

Question #5

What should bystanders on the team do?



POP QUIZ!

Answers to Question #5

- Support Jordan if they confide in them
- Consider speaking up in the moment if comfortable ("That comment seems inappropriate")
- Report concerning behavior they witness
- Not participate in or laugh at inappropriate comments



POP QUIZ!

Question #6

What should the company do?



POP QUIZ!

Answers to Question #6

- Take the complaint seriously and investigate promptly
- Protect Jordan from retaliation
- Take appropriate corrective action based on findings
- Provide training and clear policies
- Foster a culture where people feel safe reporting concerns



Example #2

Background:

Jessica is a sales associate at Riverside Retail, where she's worked for two years with consistently strong performance reviews. Six months ago, she filed a formal complaint with HR about her supervisor, Marcus, who had been making unwanted advances, including asking her out repeatedly, texting her outside work hours with personal messages, and making comments about her dating life in front of customers and coworkers.

Example #2

The Initial Response

HR investigated Jessica's complaint and concluded that Marcus' behavior violated the company's harassment policy. Marcus received a written warning and mandatory training. He was told that any further inappropriate behavior would result in termination. Jessica was assured the company had a zero-tolerance policy for retaliation.

Example #2

Week 2 After Complaint: Marcus stops speaking to Jessica except when necessary for work. He communicates with her only through terse emails, even when they're standing next to each other. Other team members notice the tension but don't know why.

Week 4: Jessica requests time off for a family wedding that she mentioned months earlier. Marcus denies the request, citing "inadequate coverage," even though he approved similar requests for two other employees during the same period.

Week 5: Marcus begins documenting minor infractions that he previously overlooked for everyone: Jessica is two minutes late clocking in, she leaves a display slightly disorganized at closing, she forgets to initial one line on a return form. He sends formal written warnings to HR for each incident. Jessica has never received any disciplinary action before.

Week 6: During a team meeting, Marcus praises several employees by name for their sales performance but doesn't mention Jessica, even though she had the highest sales that month. A coworker later tells Jessica that David has been making comments to others like, "Some people are more focused on drama than on their jobs."

Week 14: Jessica's annual performance review is due. Despite her strong sales numbers, Marcus rates her as "needs improvement" in multiple categories including "professionalism," "reliability," and "team collaboration." This is drastically different from her previous reviews. The poor review will affect her raise and bonus eligibility.

POP QUIZ!

Question #1

How does Marcus use "legitimate" management decisions to retaliate?

How can you distinguish between appropriate management actions and retaliation?



POP QUIZ!

Answers to Question #1

Scheduling, disciplinary action, performance reviews, and training opportunities are all normal management functions. Marcus exploits his discretion in these areas to punish Jessica while maintaining plausible deniability.

How to distinguish retaliation from legitimate management:

- Timing: Actions that change significantly after a complaint are suspect
- Pattern: Multiple negative actions together suggest retaliation
- Comparison: Is the employee treated differently than similarly situated colleagues?
- Pretext: Do the stated reasons hold up to scrutiny? (Jessica has top sales but gets a poor review)
- Documentation: Is there a sudden spike in documented issues that were previously ignored?



POP QUIZ!

Question #2

What should HR or upper management have done differently after Jessica's initial complaint?



POP QUIZ!

Answers to Question #2

- Assign a different supervisor or manager to Jessica / Offer Jessica alternative reporting channels outside Marcus' chain of command
- Monitor Marcus' management decisions regarding Jessica closely
 - Review scheduling decisions, time-off requests, and performance documentation
 - Compare Jessica's treatment to that of similarly situated employees
- Provide clear warnings to Marcus about what constitutes retaliation
- Establish anonymous reporting channels for retaliation concerns
- Hold managers accountable for retaliation



POP QUIZ!

Question #3

Jessica's coworkers have noticed some of these behaviors. What responsibility do they have?



POP QUIZ!

Answers to Question #3

- Report suspected retaliation to HR with dates and details
- Their silence enables the retaliation to continue
- Witness value: Their observations provide corroboration for Jessica's claims
- Cultural responsibility: Speaking up helps create a culture where retaliation isn't tolerated
- Understand they're also protected from retaliation for reporting in good faith





QUESTIONS?

THANK YOU

PGraham@chwlaw.us

www.chwlaw.us

COLANTUONO
HIGHSMITH
WHATLEY, PC

COLANTUONO, HIGHSMITH & WHATLEY, PC

Northern California

420 Sierra College Dr., Suite 140
Grass Valley, CA 95945-5091
(530) 432-7357

670 West Napa Street
Sonoma, CA 95476
(707) 986-8091

555 University Ave., Suite 275
Sacramento, CA 95825
(916) 400-0370

Southern California

790 E. Colorado Blvd., Suite 850
Pasadena, CA 91101
(213) 542-5700

7545 Irvine Center Dr., Suite 200
Irvine, CA 92618
(949) 545-9051

888 Prospect St., Suite 200
La Jolla, CA 92037
(619) 272-6200

701 Palomar Airport Rd., Suite 300
Carlsbad, CA 92011
(619) 272-6200

www.chwlaw.us