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4/21/2025 3:40 PM

SAN LUIS OBISPO SUPERIOR COURT
BY: 
M. Landrum, Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO**

MADISON BUSBY, an individual,

Plaintiff,

vs.

HANSJÖRG WYSS, an individual; HALTER
WINERY LLC, a California limited liability
company; and DOES 1 through 20, inclusive

Defendants.

CASE NO. 25CVP-0148

COMPLAINT FOR:

- 1. SEXUAL HARASSMENT (CAL. GOV. CODE § 12940)**
- 2. RETALIATION (CAL. LABOR CODE § 1102.5)**
- 3. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**
- 4. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
- 5. SEXUAL BATTERY**

DEMAND FOR JURY TRIAL

1 8. In 2019, Ms. Busby met Bryce Mullins. At the time, Mr. Mullins was working
2 for the businessman and philanthropist, Hansjörg Wyss. Mr. Wyss was the manager of his
3 winery, Halter Ranch.

4 9. Ms. Mullins and Mr. Busby began dating seriously. Ms. Busby was eager to meet
5 Mr. Wyss.

6 10. In September 2019, Mr. Wyss visited Halter Ranch. When Mr. Wyss arrived, he
7 did not attend the restaurant and, instead, requested that the three of them cook together.

8 11. While Ms. Busby cooked at the stove, Mr. Wyss, then in his mid-80s and married,
9 deliberately placed his hand on Ms. Busby's butt and groped her. Mr. Wyss proceeded to tell
10 Mr. Mullins in Ms. Busby's presence about how "good" Ms. Busby's butt looked in the dress she
11 was wearing.

12 12. A few nights later, Mr. Wyss suggested to Ms. Busby that she wear the same
13 dress again because it looked "sexy" on her. Mr. Wyss continued to make comments to Mr.
14 Mullins and Ms. Busby that she looked "sexy" and asked Mr. Mullins whether he had any "sexy"
15 photos of Ms. Busby on his phone that he could later share with him.

16 13. Ms. Busby felt appalled and disgusted by Mr. Wyss's inappropriate behavior to
17 which she did not consent. However, Ms. Busby did not complain to Mr. Wyss and simply
18 hoped it was an isolated incident. She had developed strong feelings for Mr. Mullins and was
19 afraid that any complaints would jeopardize his employment and end their blossoming
20 relationship.

21 14. In or about April 2020, Ms. Busby moved in with Mr. Mullins on Halter Ranch
22 while continuing to work remotely at an architectural firm.

23 15. A few months later, Mr. Wyss and his wife visited Halter Ranch.

24 16. During their stay, Mr. Wyss made several sexual propositions of Ms. Busby. In
25 addition, Mr. Wyss told stories of his sexual exploits in graphic detail to Ms. Busby and Mr.
26 Mullins. These included tales of his past and ongoing sexual affairs with women. Ms. Busby
27 enduring these unwanted comments again because she did not want to ruin Mr. Mullins'
28 relationship with Mr. Wyss.

1 17. In the Summer of 2020, Mr. Wyss and his wife wanted to renovate the Ridge
2 House, a large property near the estate that Mr. Wyss purchased. To supervise the renovation,
3 Mr. Mullins and Ms. Busby lived at Ridge House. Ms. Busby later began working on the
4 renovation and other design projects for Halter Ranch.

5 18. Ms. Busby became an official employee of Halter Ranch, officially reporting to
6 Mr. Wyss, in January 2021.

7 19. After Ms. Busby was hired, Mr. Wyss began to proposition Ms. Busby and Mr.
8 Mullins to have sex with him, either as a group or with Ms. Busby alone, and Mr. Wyss began
9 trying to insert himself into their sex lives. The following are examples of Mr. Wyss's
10 inappropriate conduct starting in early 2021, which continued in the months and years that
11 followed:

- 12 a. In January 2021, during a trip with Mr. Wyss to Wyoming, Mr. Wyss told Ms.
13 Busby that "if Bryce is not behaving, you can join me in bed."
14 b. Two months later in March 2021, Mr. Wyss told Ms. Busby how much he
15 enjoyed having a threesome, even with another man. He even suggested a
16 "foursome" and stated it would be "fun" for the three of them and another woman
17 by the name of "Lori".
18 c. In 2022 during a trip to Switzerland with Mr. Wyss, before Ms. Busby and Mr.
19 Mullins went to sleep, Mr. Wyss made several comments about how the two were
20 going to have sex.

21 20. Throughout 2021 and 2022, Mr. Wyss frequently shared unwelcome stories about
22 his sexual exploits and various affairs with other women.

- 23 a. In 2021, Mr. Wyss told Ms. Busby and Mr. Mullins about his many sexual affairs
24 outside of his marriage and stated there was nothing wrong with affairs. He
25 further said that Americans were "too uptight" around those having affairs.
26 b. In March 2021, during a solo visit to the estate, Mr. Wyss told a story about how
27 he and "Lori" went to a movie theatre in Switzerland. There, they met a man they
28

1 did not know, initiated oral sex with him, and then all returned to her apartment to
2 have a threesome.

- 3 c. In March 2021, Mr. Wyss subjected Ms. Busby to a live video of Lori while Mr.
4 Wyss was having phone sex with her. Mr. Wyss had previously told Ms. Busby
5 that he often had phone sex with Lori and that she could orgasm multiple times
6 just from “dirty talk.” He went on to tell Ms. Busby that he usually had phone sex
7 at Halter Ranch with Lori because his wife was not around. Mr. Wyss mentioned
8 to Ms. Busby that he wanted them to “Facetime” Lori with him.
- 9 d. For weeks, Ms. Busby dreaded the possibility of having to “Facetime” with Lori
10 because she was fearful that Mr. Wyss would attempt to engage the four of them
11 to participate in phone sex or engage in more unwanted sexualized behavior. One
12 morning, while Mr. Mullins and Ms. Busby were sitting next to each other in the
13 living room at Ridge House, they overheard Mr. Wyss speaking German on the
14 phone. Mr. Wyss then entered the living room and shoved his iPad in Ms.
15 Busby’s face. There on the screen, she saw a woman on the Facetime app
16 wearing sheer, black lingerie. Mr. Wyss introduced the woman on the screen as
17 Lori.
- 18 e. Mr. Wyss told Ms. Busby that he could “no longer perform” in the same way in
19 the bedroom and how he needed to rely primarily on oral sex now, which was
20 “fine” with him.
- 21 f. Mr. Wyss described to Ms. Busby the differences between augmented and natural
22 breasts.
- 23 g. Mr. Wyss also asked the two about their sexual preferences and experiences with
24 each other. For example, Mr. Wyss asked Ms. Busby about her favorite sexual
25 positions.
- 26 h. In February 2022, during a trip with Mr. Wyss to Switzerland, Ms. Busby and Mr.
27 Mullins were introduced by Mr. Wyss to a female friend of his. Both before and
28

1 after this introduction, Mr. Wyss informed them that this woman had always been
2 “desperate” to have sex with him.

3 i. In May and June of 2022 while visiting the estate, Mr. Wyss spontaneously stated
4 that he was in a “good mood” because he had just had sex the night before.

5 j. Throughout 2022, Ms. Busby would hear more stories from Mr. Wyss about his
6 sex life.

7 21. Ms. Busby found these interactions, comments, and stories deeply offensive.
8 They made her profoundly uncomfortable not only due to their nature, but also due to the fact
9 that she was married and Mr. Wyss was her employer. Ms. Busby attempted to ignore the
10 comments, change the subject, or deflect them. At the time, she did not raise complaints with
11 Mr. Wyss out of concern for their employment.

12 22. In addition to the above, Mr. Wyss would also remove his clothes in front of Ms.
13 Busby and Mr. Mullins, and invite them to do the same. This occurred in January 2021, during a
14 visit to Mr. Wyss’s home in Wyoming; in March 2021, during a visit to the Ranch; and after Mr.
15 Wyss experienced a fall at the Ranch and being unable to walk which required Ms. Busby to care
16 for him.

17 23. Despite being bothered and unsettled by Mr. Wyss’s behavior, Ms. Busby felt
18 pressured and compelled to stay silent because he was her employer and her husband’s
19 employer. She felt she had no choice but to endure it or jeopardize her and Mullins’ jobs, as well
20 as Mr. Mullins’ promised ownership interest in the winery and estate. Ms. Busby attempted to
21 focus her attention on her work for Halter Ranch.

22 24. However, it was not long after Ms. Busby became employed by Defendants until
23 she needed to seek treatment for the extreme anxiety and stress that she experienced every time
24 she interacted with Mr. Wyss.

25 25. At one point, Mr. Wyss himself admitted that he understood that his comments
26 and behavior towards Ms. Busby were unwanted and made her extremely uncomfortable. In
27 May or June of 2022, Mr. Wyss told Ms. Busby and Mr. Mullins that “if you ever went after me
28

1 for sexual harassment, you would win.” Despite this admission, Mr. Wyss continued with his
2 inappropriate and harassing behavior.

3 26. After years of enduring Mr. Wyss’s improper conduct, in the fall of 2022, Ms.
4 Busby needed a change by creating some “space” from Mr. Wyss when he would come to visit
5 the estate. At that point, she suffered from anxiety and distress each time Mr. Wyss stayed with
6 her and Mr. Mullins at Ridge House due to Mr. Wyss’s repeated sexualized comments and
7 propositions. Moreover, she and Mr. Mullins had recently married and informed Mr. Wyss that
8 they were expecting their first child. Ms. Busby did not want to subject herself and her new baby
9 to Mr. Wyss’s egregious behavior.

10 27. To that end, Ms. Busby and Mr. Mullins’ plan was to move out of the Ridge
11 House and into the Dubost House, a much smaller house on the estate. This move would have
12 allowed Ms. Busby and Mr. Mullins to have some privacy because it was too small to
13 accommodate Mr. Wyss during his frequent visits.

14 28. In December 2022, Ms. Busby and Mr. Mullins informed Mr. Wyss of their plans
15 to move into the smaller Dubost House.

16 29. Mr. Wyss insisted that they should remain at the Ridge House for various reasons
17 including that it was bigger and could accommodate children. However, Ms. Busby and Mr.
18 Mullins held firm to the move as they were about to have a baby and could no longer tolerate Mr.
19 Wyss’s behavior.

20 30. After this meeting, Mr. Wyss insisted Ms. Busby and Mr. Mullins begin paying
21 rent. This was the first time Mr. Wyss had ever requested that rent be paid. Mr. Wyss later
22 demanded that Ms. Busby and Mr. Mullins pay him the “market rate” value of rent at \$1,650 per
23 month at the Dubost House.

24 31. Mr. Wyss went out of his way to involve human resources at Halter Ranch,
25 Michelle Robles, to research market value rents in the area. In an email, Ms. Robles provided a
26 range of rent prices to Mr. Wyss and he purposefully selected the higher end of that range even
27 though the previous renter only paid \$300 in rent per month. No explanation was provided for
28

1 why Mr. Wyss chose to suddenly charge Ms. Busby and Mr. Mullins a higher rent to live at the
2 Dubost House, which they moved into in December 2022.

3 32. In February 2023, Ms. Busby and Mr. Mullins welcomed the birth of their first
4 child. On the same week she gave birth, Mr. Wyss asked Ms. Busby to host him and his wife for
5 a “surprise visit,” despite knowing that the couple was expecting their baby any day.

6 33. When Ms. Busby returned to work in May 2023 following her maternity leave,
7 Mr. Wyss told Ms. Busby and Mr. Mullins that they were both being “overpaid.” Fearful of any
8 more retaliation, Ms. Busby agreed to reduce her own salary from \$75,000 per year to \$65,000
9 per year.

10 34. Mr. Wyss continued to make offensive statements about women, was either
11 unable or unwilling to correct his behavior, and retaliated against both Ms. Busby and Mr.
12 Mullins for their attempts to avoid his harassment.

13 35. On or about July 31, 2024, Ms. Busby sent an email to Mr. Wyss expressing her
14 thoughts about her time employed at Halter Ranch and experiences being around Mr. Wyss. The
15 email reflected the unreasonable expectations and employment standards she endured while
16 employed and recounted various instances of inappropriate behavior and misconduct.

17 36. In the face of Mr. Wyss’s ongoing conduct and her own anxiety and distress as
18 the result of that conduct, Ms. Busby could no longer work at Halter Ranch and was forced to
19 resign in July 2024 with her last day being July 31, 2024.

20 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

21 37. On April 21, 2025, Plaintiff filed a timely complaint with the California
22 Department of Fair Employment and Housing (“DFEH”) against Defendants regarding the facts
23 underlying the California Fa Employment and Housing Act (“FEHA”) claims in this Complaint.
24 Thereafter, Plaintiff received a Right to Sue notice from the DFEH. *See Exhibit A.*

FIRST CAUSE OF ACTION

(Sexual Harassment in Violation of Gov. Code § 12940)

(Against All Defendants)

38. Plaintiff hereby re-alleges and incorporates by reference the paragraphs above, as though fully set forth herein.

39. At all times mentioned in this Complaint, it was a fundamental policy of the State of California that Halter Winery and Mr. Wyss prohibit the sexual harassment of any of their employees and the existence of a hostile work environment.

40. Sexual harassment consists of any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. There are two forms of sexual harassment: quid pro quo harassment (i.e. conditioning an employee's continued employment and job benefits with submission to the harassment) and hostile work environment harassment. Ms. Busby experienced a hostile work environment.

41. Ms. Busby was an employee of Halter Winery and directly reported to Mr. Wyss, her employer.

42. Ms. Busby experienced a hostile work environment as a result of Mr. Wyss's unwanted behavior. At the time, Mr. Wyss was an 80-year-old man who made multiple sexual advances and inappropriate sexual comments to Ms. Busby, a woman in her twenties. Mr. Wyss repeatedly propositioned Ms. Busby for sex, told inappropriate and unpalatable stories about his current and prior sexual encounters with men and women, exposed him on numerous occasions, and made lewd, inappropriate, and unprofessional comments about her appearance.

43. Mr. Wyss's unacceptable and inappropriate behavior occurred nearly every time Mr. Wyss was alone with Mr. Busby and/or Mr. Mullins.

44. From 2020 to 2023, Mr. Wyss discussed and unilaterally shared the most intimate details of his sex life, preferences, and peccadilloes with Ms. Busby, who was his employee and reported to him.

45. As the result of Mr. Wyss's abusive and predatory behavior, Ms. Busby's health and well-being suffered until she was eventually forced to resign. Mr. Wyss's behavior was no

1 longer tolerable and caused Ms. Busby to sustain a loss in income, loss in employee benefits, and
2 suffer emotional distress.

3 **SECOND CAUSE OF ACTION**

4 **(Retaliation in Violation of Cal. Lab. Code § 1102.5)**

5 **(Against All Defendants)**

6 46. Plaintiff hereby re-alleges and incorporates by reference the paragraphs above, as
7 though fully set forth herein.

8 47. At all relevant times, Labor Code section 1102.5 was in effect and binding on
9 Defendants. This statute prohibits Defendants from retaliating against any employee, including
10 Plaintiff, for engaging in protected conduct.

11 48. In or around fall of 2022, when Ms. Busby resisted Mr. Wyss's ongoing sexual
12 harassment by moving out of the Ridge House, Mr. Wyss retaliated against her. The move to the
13 Dubost House would have made it more difficult for Mr. Wyss to be around Ms. Busby and/or
14 Mr. Mullins.

15 49. Prior to the move, Ms. Busby and Mr. Mullins were not charged rent on the
16 properties. After the move, Mr. Wyss abruptly began charging the couple rent that was much
17 higher than the previous tenant, and also cut their salaries.

18 50. As a result of Ms. Busby's attempt to refuse his sexual advances, Mr. Wyss
19 punished Ms. Busby and Mr. Mullins by, among other things, forcing her to reduce her salary
20 and breaching his promises regarding ownership interest in the winery and estate. This
21 condemnation resulted in Ms. Busby's forced resignation.

22 51. As a result of Defendants' willful, knowing, and intentional misconduct, Ms.
23 Busby has sustained loss of earnings, employment benefits, and emotional distress.

24 **THIRD CAUSE OF ACTION**

25 **(Wrongful Termination in Violation of Public Policy)**

26 **(Against Defendant Halter Winery, LLC)**

27 52. Plaintiff hereby re-alleges and incorporates by reference the paragraphs above as
28 though fully set forth herein.

53. At all times mentioned in this Complaint, it was a fundamental policy of the State of California that Halter Ranch not discriminate and/or retaliate against any employee on the basis of engagement in a protected activity.

54. Ms. Busby was an employee of Halter Ranch and was forced to resign as a result of Mr. Wyss's inappropriate behavior.

55. Halter Ranch, by and through Mr. Wyss, imposed years of misconduct consisting of sexual propositions, nude or near-nude exposures, lascivious comments, and other disturbing and unprofessional behavior toward Ms. Busby, an employee of Halter Ranch, in violation of public policy.

56. Ms. Busby's opposition to Mr. Wyss's intolerable behavior, including moving to a new house to distance herself from Mr. Wyss, was a substantial motivating reason for the increased retaliation against the couple and eventual forced discharge of Ms. Busby.

57. As a result of Halter Ranch's willful, knowing, and intentional misconduct, Plaintiff has sustained loss of income, employment benefits, and suffered emotional distress.

58. Halter Ranch's wrongful termination of Plaintiff's employment was done intentionally, in a malicious, oppressive manner, entitling Plaintiff to punitive damages.

FOURTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)

(Against Defendant Hansjorg Wyss)

59. Plaintiff hereby re-alleges and incorporates by reference the paragraphs above, as though fully set forth herein.

60. Ms. Wyss spent years engaging in outrageous conduct going beyond the bounds of decency.

61. Mr. Wyss brazenly groped Ms. Busby and made lewd and lascivious comments about her to her future husband (and immediate subordinate) Mr. Mullins in 2019.

62. After hiring Ms. Busby and making a series of false promises to Mr. Mullins in the presence of Ms. Busby, his conduct only worsened, almost as if to flaunt that he could

1 continue making sexual advances and comments towards Ms. Busby while they were forced to
2 stay silent.

3 63. While employed by Defendants, Ms. Busby sought medical treatment in 2021 as
4 the result of Mr. Wyss's sexual harassment and hostile work environment. She was prescribed
5 anxiety medication.

6 64. Understandably so after having endured years of Mr. Wyss's outrageous conduct,
7 Ms. Busby's emotional distress is severe and has only worsened over time.

8 65. Ms. Busby's damages from having to endure years of sexual harassment will be
9 substantial.

10 66. As a result of the severity and pervasiveness of Mr. Wyss's outrageous conduct,
11 history of harassing behavior, and as a deterrent to prevent Mr. Wyss from engaging in future
12 misconduct, Ms. Busby is entitled to punitive damages.

13 **FIFTH CAUSE OF ACTION**

14 **(Sexual Battery)**

15 **(Against Defendant Hansjorg Wyss)**

16 67. Plaintiff hereby re-alleges and incorporates by reference the paragraphs above,
17 as though fully set forth herein.

18 68. As described above, Mr. Wyss caused, and intended to cause, Ms. Busby to have
19 imminent apprehension of a harmful and offensive contact with an intimate part of another.

20 69. In 2019, when Ms. Busby first met Mr. Wyss, he placed his hand on her behind
21 and groped her.

22 70. Mr. Wyss has caused, and intended to cause, Ms. Busby to have imminent
23 apprehension of harmful and offensive contact with Plaintiff's person that would offend a
24 reasonable person's sense of personal dignity. Further, such acts did cause a harmful or
25 offensive contact with an intimate part of Plaintiff's person such as would offend a reasonable
26 person's sense of personal dignity.

27 71. Ms. Busby was offended and harmed by Mr. Wyss's actions.
28

72. As a proximate result of Mr. Wyss's unlawful actions, as described above, Ms. Busby has suffered and continues to suffer damages in the form of loss of earnings, loss of other employment benefits, and losses of employment-related opportunities for growth in her field, all in an amount to be proven at trial.

73. As a proximate result of Mr. Wyss's unlawful actions, Ms. Busby has suffered and continues to suffer anxiety, embarrassment, humiliation, and emotional distress.

74. The acts taken toward Plaintiff were carried out in a deliberate, despicable, oppressive, egregious, and inexcusable manner in order to injure and damage her, thereby justifying an award of punitive damages in a sum appropriate to punish Defendant.

PRAYER FOR RELIEF

75. For actual and compensatory, general and special damages, including lost earnings, back-pay, future-pay, lost employment benefits, and unpaid wages in an amount to be proven at trial;

76. For punitive damages, according to proof;

77. For pre-judgment and post-judgment interest on all damages awarded;

78. For penalties and other damages available by law or statute, including under Labor Code § 203;

79. For reasonable attorneys' fees;

80. For costs of the suit incurred;

81. For such other relief in favor of Plaintiff as the Court deems proper and just.

DATED: April 21, 2025

Respectfully submitted,
LIANG LY LLP

By: /s/ John K. Ly
John K. Ly
Jennifer L. Chor
Attorneys for Madison Busby

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands trial by jury on all causes of action for which trial by jury is available.

DATED: April 21, 2025

Respectfully submitted,
LIANG LY LLP

By: /s/ John K. Ly
John K. Ly
Jennifer L. Chor
Attorneys for Madison Busby

Exhibit A



Civil Rights Department

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

April 21, 2025

John Ly
601 S. Figueroa St., Suite 1950
Los Angeles, CA 90017

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202504-29056521
Right to Sue: Busby / Wyss et al.

Dear John Ly:

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

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

April 21, 2025

RE: **Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202504-29056521

Right to Sue: Busby / Wyss et al.

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.

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 Bannan Street, Suite 200 | Sacramento | CA | 95811
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calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

April 21, 2025

Madison Busby
601 S. Figueroa St., Suite 1950
Los Angeles, CA 90017

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202504-29056521
Right to Sue: Busby / Wyss et al.

Dear Madison Busby:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective April 21, 2025 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.

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

Madison Busby

CRD No. 202504-29056521

Complainant,

vs.

Hansjorg Wyss

,

Halter Winery LLC
8910 Adelaida Road
Paso Robles, CA 93446

Respondents

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

2. Complainant is naming **Halter Winery LLC** business as Co-Respondent(s).

3. Complainant **Madison Busby**, resides in the City of **Los Angeles**, State of **CA**.

4. Complainant alleges that on or about **July 31, 2024**, respondent took the following adverse actions:

Complainant was harassed because of complainant's sex/gender, sexual harassment.

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

Additional Complaint Details:

1 VERIFICATION

2 I, **John Ly**, am the **Attorney** in the above-entitled complaint. I have read the foregoing
3 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
information and belief, which I believe to be true.

5 On April 21, 2025, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **Los Angeles, California**