

Employee's Indirect Exposure To Harassing Conduct Supported \$4 Million Verdict

California Employment Law Update on July 23, 2025

1753307449-12044-706-lxb_photoffH_GkINfyYlxb_photo-
[Scott Rodgerson](#), Unsplash

Carranza v. City of Los Angeles, 111 Cal. App. 5th 388 (2025)

Lilian Carranza, an LAPD captain, learned that a photo of a topless woman who looked like but was not Carranza was circulating electronically among LAPD personnel. Carranza asked the Department to notify its employees that the photo was not of her and to order the employees to stop sharing it with one another. The LAPD declined to do so and failed to discipline any officers associated with the alleged harassment. Carranza sued the City of Los Angeles, alleging one cause of action for hostile work environment due to sexual harassment under the Fair Employment and Housing Act (FEHA). A jury awarded Carranza \$4 million for past and future emotional distress damages. On appeal, the City argued that Carranza did not experience the alleged harassment directly and that the conduct alleged was neither severe nor pervasive enough to alter the conditions of her job. The Court of Appeal affirmed the judgment in Carranza's favor, holding that substantial evidence supported the jury's verdict.

[View original.](#)

Related Professionals

- **Anthony J. Oncidi**
Partner