



**ALTGELT  
LAW OFFICE**

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George J. Altgelt  
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Laredo, Texas 78041

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August 10, 2023

ATTN: David R. Canales  
Associate Superintendent of Human Resources  
United Independent School District  
201 Lindenwood Drive  
Laredo, Texas 78041  
*Via Email: dcanales@uisd.net*

Dear Mr. Canales & U.I.S.D Board of Trustees:

Please be advised that this office represents Ms. Ana Cordova in the Grievance herein attached, we would like to be scheduled and contacted at your earliest convenience to discuss this matter. Enclosed is *Exhibit A*: Grievant narrative, *Exhibit B*: USB Audio/Video recording, *Exhibit C*: Photo of call, *Exhibit D*: Texas Rangers Correspondence and *Exhibit E*: EEOC Correspondence. We would also like to advise that this Grievance packet has also been sent to all U.I.S.D. Board Members, Texas Rangers, and a copy of the Audio/Video has been sent to the Media such as KGNS Laredo, Laredo Morning Times and the San Antonio Express News. We greatly thank you for your attention and courtesies to this matter and look forward to your response. Should you have any questions or concerns please feel free to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read "George J. Altgelt".

George J. Altgelt



Date Received

# UNITED INDEPENDENT SCHOOL DISTRICT

Exhibit A EMPLOYEE COMPLAINT/GRIEVANCE

DGBA (LEGAL) & (LOCAL)

## Level One Notice of Complaint/Grievance to Administrator

To file a formal complaint, please fill out this form completely and submit it by hand delivery, fax, e-mail or U.S. mail to the appropriate administrator within the time established in FNG (Local). A complaint filed via e-mail must be copied to the Director of Employee Relations. All complaints will be processed in accordance with FNG (Legal) and (Local) or any exceptions outlined therein.

### Parent information (All information is required) PLEASE PRINT

<b>Name</b> Ana Cordova		
<b>Address</b> 4207 Morelia Ave.	<b>City/State</b> Laredo, TX	<b>E-mail</b> sadgirlana@yahoo.com
<b>Phone</b> 956-645-0521	<b>Campus/Department</b> United South 9 <sup>th</sup> Grade Campus	

### If you will be represented in voicing your complaint, please identify the person representing you.

<input type="checkbox"/> Legal Counsel Representative	<b>Name/Organization</b> Altgelt Law Office
<b>Address</b> 219 E. Del Mar Suite 2	<b>City/State</b> Laredo, Texas 78041
<b>Phone</b> 956-725-4400	<b>E-mail</b> laredolawoffice@gmail.com

- Please describe the decision or circumstances causing your complaint (give specific details, continue on reverse side if necessary).  
Please see the Narrative Attached, Exhibit "A", and Exhibit "B" (recording of David Gonzalez, Lorena Chavez and Grievant.
- What was the date of the decision or circumstance causing your complaint?  
Sexual Harassment and Retaliation is ongoing and reoccurring.
- Please explain in detail the following:
  - How you have been harmed by this decision or circumstance:  
See response to "1" above. The grievant has suffered severe emotional distress and retaliation for having reported the unwanted sexual advances of Superintendent David Gonzalez to the UISD Administration and Human Resources Department.
  - The District policy violated, misinterpreted, or misapplied: DIA-Local

4. What efforts have you made to resolve your complaint informally and the response to your efforts?  
The grievant complained to, then, H.R. Assistant Superintendent David Garcia, who spoke with Roberto Santos, who then directed her to make a statement with Rita Gardner, who interviewed the Grievant and took notes while the grievant hand-wrote her statement memorializing David Gonzalez's unwanted sexual advances.
5. With whom did you communicate? Originally, with David Garcia and Rita Gardener and then the grievant communicated directly with David Gonzalez and Lorena Chavez.
6. On what date? See Attached Exhibit "A."
7. Please describe the outcome or remedy you seek for this complaint. The Grievant requests the immediate resignation of David Gonzalez and his accomplice Lorena Chavez and/or alternatively, that they both be fired for cause. The Grievant also requests economic and non-economic damages to compensate for the severe pervasive and outrageous conduct she had to endure at the hands of David Gonzalez. In addition, the district buys her contract for the next seven years.
8. If you are making complaints or charges against any specific individuals, please identify each of those individuals by name and title:  
Superintendent David Gonzalez and his personal assistant Lorena Chavez and any other persons known or unknown at this time that was part of the district's coverup and retaliation.
9. Are you alleging a violation of the Texas Whistleblower Act?  
Yes \_\_\_\_\_ No \_\_\_\_\_  
Not Yet; However, this crime has been reported to the Texas Rangers for both Texas Penal Code 39.02, Abuse of Official Capacity, and 39.03 (3), Official Oppression and intentionally Sexually Harassing(See Exhibit D)
10. Are you alleging a violation of law? If so, please identify below:  
See Answer No.9, Chapter 21, Texas Labor Code and Title VII of the Civil Rights Act. (See Exhibit E)
11. Are you alleging that your supervisor either violated the law in the workplace or has unlawfully harassed you?  
Yes X No \_\_\_\_\_

**Complainant, please note:**

**A complaint form that is incomplete in any material may be dismissed, but may be re-filed with all the required information if the re-filing is within the designated time for filing a complaint. Attach to this form any documents you believe will support the complaint, if unavailable when you submit this form they may be presented no later than the Level One Conference. Please keep a copy of the completed form and any supporting documentation for**

hearing, unless such evidence is presented at the Level One conference. You will have fifteen (15) minutes to present your grievance.

*Debra L. Cadman*  
Employee Signature

8/9/23  
Date of Filing

/s/ George J. Altgelt  
Signature of Employee's representative

08/09/2023  
Date

\_\_\_\_\_  
Superintendent's signature/Designee

\_\_\_\_\_  
Date Received

Revised 5/2014

# EXHIBIT "A"

## EXHIBIT "A"

The Grievant has been an employee with UISD for over 29 years and has never been disciplined or grieved against. On August the 9<sup>th</sup>, 2023, the Grievant was working her assigned duties and reported at the Laredo Sames Arena for UISD Back to School Convocation event. Upon entry she encountered UISD Superintendent David Gonzalez' Administrative Assistant, Lorena Chavez. Ms. Chavez refused to acknowledge the Grievant and then took a picture of her with her cell phone. Based on information and belief the Grievant believes that Ms. Chavez forwarded this photo to David Gonzalez.

The District is now on formal SPOLIATION NOTICE, and request is made herein, that the Superintendent and Ms. Chavez' phones be seized and "dumped" so that this evidence is preserved. Furthermore, the Grievant does not authorize the use of her image in anyway by the District.

The current complaint originates from her having been the victim of Superintendent David Gonzalez' (hereinafter DG) unwanted sexual advances, sexual harassment, and retaliation for having filed a complaint against him contemporaneously with the originating event(s) that occurred. The Grievant at the time of the original sexual harassment worked as a LPAC Clerk at Washington Middle wherein DG was the principal at the time. The time frame for these events was approximately the 2011-2012 school year from which the Grievant endured his severe, pervasive and outrageous sexual harassment. He would routinely invade her personal space, get face to face with her, stare down her place, he would put his hands on the small of her back and on her breasts, and would rub his penis on her by catching her by surprise while she was making copies.

DG's sexual harassment also extended to him asking her to show up to work early, to join him at his mother's house, and on one occasion he called her to her cell phone to come into his office at Washington Middle to come and "see his boxers". At every sexual advance the Grievant ignored his incessant demands for sex and kept on with her work duties out of fear of being fired.

Due to the stress of being constantly sexually harassed the Grievant began to suffer from anxiety and acute panic attacks, very high blood pressure and depression. Ultimately, she had to be hospitalized for a week. Her doctors then advised her that she needed to make changes in her work environment or she could suffer a major illness. She then decided to resign, however, the District refused to accept her resignation and that's when the Grievant then requested to visit with the Assistant Superintendent of Human Resources David Garcia to effectuate her resignation. He then inquired as to why she wanted to resign and upon learning the same had her debrief with HR Director Rita Gardner to hand write out her complaint detailing DG's sexual harassment, the hostile work environment he created, being hospitalized due to the stress he caused her, and thus her doctor's recommendations to leave the place where she worked. Two Open Records Requests were made for both her original complaint and Ms. Garners notes, and as of to date they have to been provided..

Rita Gardner took detailed handwritten notes of the Grievant's account and then the District gave her options of where there were openings within the District and to pick from whichever one she wanted. She then chose the Registrar position at United South Middle, and then was offered another position as a LPAC Support Clerk. The Grievant is currently at the United South 9<sup>th</sup> Grade campus working as a LPAC Clerk.

Two years prior to Roberto Santos' resignation DG was employed at Curriculum and Instruction and went out of his way to the Grievant's place of employment to confront her in person. Upon seeing him the Grievant was startled and she stood up but had no means of escaping him as he found her in her office and came in, closed the door and then forced a hug upon her and stated that he wanted to apologize for what he had done and that the reason for his visit was because Roberto Santos was thinking about resigning and that he was going to apply for Superintendent and that he wanted to put all of this behind him and to ask the Grievant not to say anything because if she did he "would not have a future". The Grievant felt intimidated that if he was going to be her new boss then she better cooperate with him because she needed her job because she is the head of the household and takes care of both her disabled parents and her recently orphaned nephews at that time. She then reported both the visit and unwanted touch of DG to both HR personnel David Garcia and Rita Gardner (who again took notes).

So much for apologies.... During the STAR Testing of early December 2021 DG went to the Grievant's place of work and while she was in the hallway doing "hall duty" he approached her and said "that she was losing lots of weight and getting more beautiful". Unfortunately, the weight loss was due to the poor health that his traumatizing had caused. She then shook her head side to side and stood there in disbelief as he walked away.

Before Robert Santos left the District in May of 2021, DG then applied for the position of Superintendent just prior in April of 2021. During the application and interview/selection process the Grievant received a phone call from David Canales' secretary, Lorena Chavez (*See Exhibit "C"* also in April of 2021), stating that DG wanted to speak with her. The next day Ms. Chavez called her again and upon receiving the phone call, the Grievant had the presence of mind to activate her audio/video recorder on her cell phone and proceeded to record the entire conversation between her and both Ms. Chavez and DG. In the aforementioned recording Ms. Chavez puts the Grievant on a quick hold and transfers the call to DG wherein he proceeds to apologize to her (again) stating that he's been to confession and has sought forgiveness from God and that he was sorry for what he had done. He then proceeds to ask her to write a letter to HR recanting her original complaint about him having victimizing her, and to lie that she had just wrote that letter to get back at him because she was angry and that as soon as she had the letter done to just call Ms. Chavez and that in exchange for the letter he would put in a good word with Robert Santos to make sure she wasn't fired for having originally written a false statement because she had already suffered a lot at his own hands.

He also said that once he was Superintendent he would "take care of" the Grievant and that she could pick a campus where she would like to work. (*See Exhibit "B"*). He went on to say that everyone was rooting for him to get the position including Henry Cuellar. The Grievant then asks him what to do and he begins to dictate to her what to write.

In June of 2021, Ms. Chavez also attempted to arrange an in person meeting between the Grievant and her tormentor at the Adoration Chapel behind St. Patrick's Catholic Church. The Grievant refused his invitation citing that she didn't have any more personal days to use since she had burned through them on all of her doctors' visits. The Grievant refuses to submit the written letter as per DG's instructions because she is upset, has integrity, and it would be falsifying a government document.

DG ultimately gets the job as Superintendent at UISD and then shows up at her assigned campus for a luncheon on June 13<sup>th</sup>. Both the assigned security guard and the Grievant greet him

when he was walking in and then DG confronts her again there at the second entrance of the 9<sup>th</sup> grade campus and in silence makes a face directly at her as if he is angry with her.

Due to DG's and the District's conduct towards the Grievant she has had to burn up all of her sick leave and personal days year after year, always placing her in a sick leave deficit to the point that her paycheck is reduced time and time again for missed work, all related to the severe mental and emotional stress related to DG's sexual harassment of the Grievant, the subsequent hostile work environment and the retaliation that occurred.

Due to the work-related sexual harassment stress the Grievant has endured she has had Border Region MHMR intervention, she been hospitalized, sent to the ER and been placed on FMLA. She has been prescribed anti-anxiety and anti-depressant medicines and has been diagnosed with PTSD and suicidal thoughts. She has also had to undergo cognitive behavioral therapy and psychiatric/psychological treatment. Her biggest fear now is that the District and DG will retaliate against her and that there are also others that are too afraid to come out and face DG.

Be advised that the entirety of this complaint has been filed with the Texas Rangers ([ernesto.salinas@dps.texas.gov](mailto:ernesto.salinas@dps.texas.gov)) for purposes of a criminal prosecution for the aforementioned violations of the Penal Code. In addition, a courtesy copy has been dropped off with the Webb County District Attorney's Office and a EEOC Complaint has been filed. Should the District in anyway retaliate against the Grievant undersigned counsel will recommend to his client that she initiate a lawsuit, file both a Whistleblower Complaint and a complaint for retaliation, and seek any and all legal remedies available to her, as well as, hold a press conference to inform the local, state and national media outlets exactly how tax dollars are being spent at was once a good school district, but that is now a haven for torturing good public servants and rewarding self-interested sexual deviants.



# EXHIBIT “B”

USB Enclosed

# EXHIBIT "C"

9564

New call  
Line: 1416




- Testing Coordinator--USHS9 3:29 PM Today  
• 1424
- Lorena Chavez---INST 3:22 PM Today  
• 1948
- Asst Principal 2--USHS9 3:12 PM Today  
• 1405
- 93335742 2:41 PM Today

Cancel

Call



# “EXHIBIT D”

**From:** George Altgelt laredolawoffice@gmail.com   
**Subject:** Complaint on Behalf of A. Cordova  
**Date:** August 10, 2023 at 11:12 AM  
**To:** ernesto.salinas@dps.texas.gov



Good morning,

Attached, please find a complaint Mr. Altgelt is filing with multiple venues in regard to Ms. Ana Cordova. Additionally, Exhibit "C" is too large to email; kindly advise if you would like to arrange for us to have it dropped off or if you would like to pick it up. We would appreciate it if you could kindly advise once you are in receipt of said complaint. Thank you in advance for your assistance and attention to this matter.

*Best Regards,*

George J. Altgelt, Esq.  
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Laredo, TX 78041  
Office: 956.725.4400  
Cell: 956.645.2231  
Fax: 956.725.4401  
[laredolawoffice@gmail.com](mailto:laredolawoffice@gmail.com)  
[info@altgeltlaw.com](mailto:info@altgeltlaw.com)

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Cordova.Compla  
intPacket.pdf

“EXHIBIT E”

<p><b>CHARGE OF DISCRIMINATION</b></p> <p><small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small></p>	<p>Charge Presented to: Agency(ies) Charge No(s):</p> <p><input type="checkbox"/> FEPA</p> <p><input checked="" type="checkbox"/> EEOC</p>
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\_\_\_\_\_ and EEOC

*State or local Agency, if any*

Name <i>(indicate Mr. Ms. Mrs.)</i> Ms. Ana Cordova	Home Phone (Incl. Area Code) (956) 645-0521	Date of Birth 08/21/1972
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Street Address 4207 Morelia	City, State and ZIP Code Laredo, Texas 78046
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Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. *(If more than two, list under PARTICULARS below.)*

Name United Independent School District	No. Employees, Members 6,300	Phone No. (Include Area Code) 956-473-6201
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Street Address 201 Lindendwood.	City, State and ZIP Code Laredo, Texas 78040
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Name	No. Employees, Members	Phone No. (Include Area Code)
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Street Address	City, State and ZIP Code
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<p>DISCRIMINATION BASED ON <i>(Check appropriate box(es).)</i></p> <p><input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN</p> <p><input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input checked="" type="checkbox"/> OTHER (Specify below.) <u>Sexual Harassment</u></p>	<p>DATE(S) DISCRIMINATION TOOK PLACE</p> <p style="text-align: center;">Earliest                      Latest</p> <p style="text-align: center;">2011                                      2021</p> <p><input type="checkbox"/> CONTINUING ACTION</p>
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THE PARTICULARS ARE *(If additional paper is needed, attached extra sheet(s)):*

See Attachment.

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p>
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<p>I declare under penalty of perjury that the above is true and correct.</p> <p style="text-align: center;"> <u>08/10/23</u>  <i>Date</i> </p> <p style="text-align: center;">   <i>Charging Party Signature</i> </p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p style="text-align: center;"><u>/s/ Ana Cordova</u></p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE</p> <p style="text-align: center;"><i>August 10, 2023</i></p>
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