FILED
2ND JUDICIAL DISTRICT COURT
Bernalillo County
10/28/2026 11:14 AM
KATINA WATSON
CLERK OF THE COURT
Isaiah Chavez

SECOND JUDICIAL DISTRICT COURT
BERNALILLO COUNTY
STATE OF NEW MEXICO

CHRISTIAN PATRICK,

Plaintiff,

D-202-CV-2026-10147

v.

NEW MEXICO LIVESTOCK BOARD AND BARRY ALLEN,

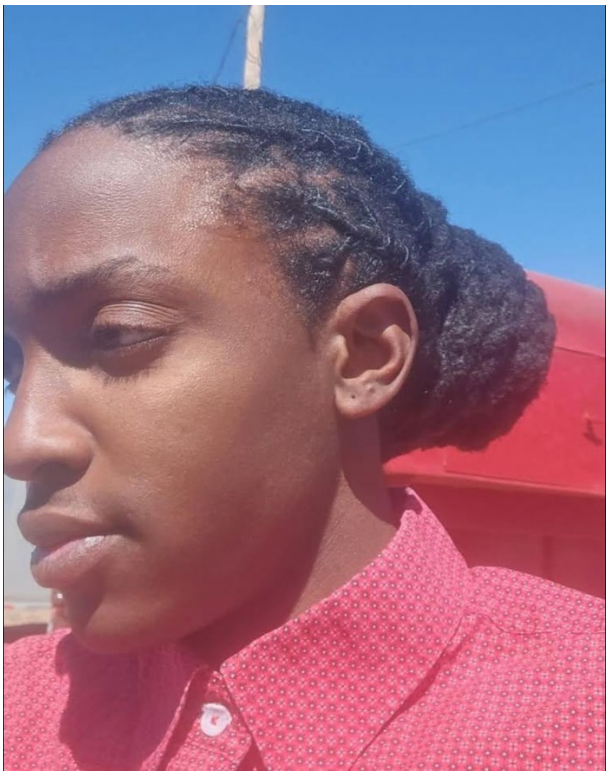
Defendants.

COMPLAINT FOR VIOLATIONS OF THE NEW MEXICO HUMAN RIGHTS ACT

When the New Mexico Livestock Board ("Board") hired Plaintiff Christian Patrick as a livestock inspector, he felt he was beginning his dream career. The livestock inspector position would allow him to realize his dream of working as law enforcement and pursue his passion for cattle and horses. After the Board offered him the job, Mr. Patrick moved from Clayton to Carlsbad, leasing a new home and preparing for his new role.

As part of his preparation, Mr. Patrick contacted the Board's Human Resources Manager, Stephanie Lujan. Mr. Patrick is Black and wears his hair in locs[1], a common protective hairstyle worn by many Black people. He asked Ms. Lujan if wearing his hair in a bun that did not touch or protrude past his collar would comply with the Board's policy. Ms. Lujan confirmed that it would. Mr. Patrick visited his hairdresser, who cut about nine inches from his locs and sewed them into a bun.

[1] "Locs" are also commonly referred to and, perhaps, more well-known as "dreadlocks." Plaintiff uses the term "locs" in his Complaint as this is the term he normally uses for them in his everyday life.



On his first day of orientation, Mr. Patrick spoke with his supervisor, Daniel Dictson, who confirmed that Mr. Patrick's hair complied with the Board's policy. However, on his third day of work, the Board's Chief Law Enforcement Officer Barry Allen told Mr. Patrick that his hair was too long—and that if he wanted to keep his job, he would have to cut it. Officer Allen said he had spoken with the Board's Executive Director Belinda Garland, who said Mr. Patrick's hair was too long. Officer Allen also told Mr. Patrick that he was "not a fan" of his hair, his hair did not look "presentable," and the Board would not want Mr. Patrick interacting with livestock producers unless he cut his hair. Mr. Patrick refused, and the Board fired him. The Board's actions violated the New Mexico Human Rights Act.

Mr. Patrick, through his attorneys of record, the ACLU of New Mexico (Jazmyn Taitingfong, Kristin Greer Love and Maria Martinez Sanchez), brings this Complaint to remedy the Board's violations of the Act. In support of his Complaint, Mr. Patrick states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter and parties to this action pursuant to the Court's general jurisdiction and jurisdiction conferred by the New Mexico Human Rights Act (NMSA 1978 § 28-1-12).

2. Venue is proper in the Second Judicial District as Defendant New Mexico Livestock Board is based in Bernalillo County, New Mexico.

3. Plaintiff Christian Patrick ("Mr. Patrick") currently resides in Union County, New Mexico.

4. The New Mexico Department of Workforce Solutions Human Rights Bureau issued Plaintiff Mr. Patrick an Order of Non-Determination on August 19, 2026. See **Exhibit A**.

5. Pursuant to NMSA 1978, § 28-1-13, Mr. Patrick has filed this Complaint in district court within 90 days of receiving the Order of Non-Determination.

PARTIES

6. Plaintiff Mr. Patrick was a public employee, employed by the New Mexico Livestock Board from March 14 through March 17, 2026, when the Board fired him.

7. Defendant New Mexico Livestock Board is an employer pursuant to the New Mexico Human Rights Act because it "employs four or more persons." NMSA 1978, § 28-1-2(B).

8. At all times material to this lawsuit, Defendant Barry Allen served as the Livestock Board's Chief Law Enforcement Officer. In this capacity, he had supervisory and disciplinary authority over Mr. Patrick.

FACTUAL ALLEGATIONS

9. Christian Patrick ("Mr. Patrick") is a dedicated and experienced livestock handler.

10. Mr. Patrick is a Black man who wears his hair in long locs.

11. Locs are a protective hair style.

12. On February 5, 2026, Mr. Patrick interviewed with the New Mexico Livestock Board ("Livestock Board") for a Livestock Inspector position in Carlsbad, New Mexico.

13. When he interviewed for the Livestock Inspector position—and during his entire employment with the Livestock Board—Mr. Patrick met all of the requirements for the Livestock Inspector role.

14. At the time of his Livestock Board interview, Mr. Patrick had a high school diploma.

15. At the time of the Livestock Board interview, Mr. Patrick had more than two years of livestock and agricultural experience.

16. At the time of his interview, and during his entire employment with the Livestock Board, Mr. Patrick maintained a valid driver's license.

17. On February 15, 2026, the Livestock Board offered Mr. Patrick a Livestock Inspector position in Carlsbad, which he accepted.

18. Mr. Patrick completed a pre-employment background check for the Livestock Inspector position.

19. Mr. Patrick completed a pre-employment drug test for the Livestock Inspector position.

20. As part of his employment, Mr. Patrick also agreed to obtain his Law Enforcement Certification within a year of hire.

21. In March 2026, Mr. Patrick moved from Clayton to Carlsbad, New Mexico for his new job.

22. Mr. Patrick leased a home in Carlsbad.

23. On March 13, 2026, Mr. Patrick contacted the Livestock Board's Human Resources Department.

24. Mr. Patrick spoke with Livestock Board Human Resources Manager Stephanie Lujan.

25. Mr. Patrick asked Manager Lujan if it was acceptable for him to have his locs in a bun, if the bun did not touch or protrude past his collar.

26. Manager Lujan told Mr. Patrick that wearing his hair in this manner would comply with the Livestock Board's policies.

27. On March 14, 2026, Mr. Patrick started his first day of employment with the Livestock Board.

28. During his entire employment with the Livestock Board, Mr. Patrick's locs were pulled back and sewn into a neat bun that did not go past his collar.

29. On March 16, 2026, Mr. Patrick spoke to his direct supervisor, Daniel Dictson, to confirm his hair conformed with the Livestock Board's policies.

30. Daniel Dictson told Mr. Patrick that he did not have a problem with his hair but that he did not make the final decisions.

31. On March 17, 2026, during his orientation, Mr. Patrick met with the Livestock Board's Chief Law Enforcement Officer, Defendant Barry Allen, in Albuquerque, New Mexico.

32. Defendant Allen said that he spoke with Belinda Garland, the Livestock Board's Executive Director, about Mr. Patrick's hair.

33. Defendant Allen said Executive Director Garland informed him that Mr. Patrick's hair length was impermissible.

34. Mr. Patrick told Defendant Allen that the Livestock Board's Human Resources Department told him that having his locs sewn into a bun conformed with the Livestock Board's policies.

35. Defendant Allen told Mr. Patrick that he "was not a fan" of Mr. Patrick's hair.

36. Defendant Allen told Mr. Patrick that his hair did not look "presentable" to producers.

37. Defendant Allen told Mr. Patrick that the Livestock Board did not want Mr. Patrick interacting with producers until he cut his hair.

38. Defendant Allen's statement that Mr. Patrick's hair did not look "presentable," with no other explanation, made clear to Mr. Patrick that Defendant Allen's actions were motivated based on his race and hairstyle commonly worn by others of his race.

39. Mr. Patrick told Defendant Allen about the New Mexico Crown Act, which prohibits race-based discrimination against people for traits associated with race, including protective hairstyles.

40. Defendant Allen said that Mr. Patrick's hair had nothing to do with his religion or anything else, even though the Crown Act is not limited to religious headdresses.

41. Defendant Allen did not state any reason, other than his hairstyle, that Mr. Patrick was not qualified for his position.

42. Defendant Allen did not state any reason that Mr. Patrick would be unable to fulfill the requirements of his position because of his hairstyle.

43. Mr. Patrick asked Defendant Allen what would happen if he did not cut his hair.

44. Defendant Allen said that if Mr. Patrick did not cut his hair, the Livestock Board would have to terminate him from his position of employment.

45. Mr. Patrick exited Defendant Allen's office to consider his options and make a final decision.

46. Mr. Dictson, Mr. Patrick's direct supervisor, approached Mr. Patrick and told him he needed to decide that day whether he would cut his hair.

47. Mr. Patrick asked Mr. Dictson if he had seen other males in law enforcement with their hair in buns.

48. Mr. Dictson said that several men had their hair in long braids at different offices across the state.

49. Mr. Patrick told Mr. Dictson that he would not cut his hair.

50. Mr. Dictson said he would let Defendant Allen know and that Mr. Patrick could collect his things.

51. Mr. Dictson went into Defendant Allen's office.

52. After briefly meeting with Defendant Allen, Mr. Dictson returned to Mr. Patrick and collected the keys to the work truck he was issued.

53. Mr. Dictson drove Mr. Patrick to Roswell, New Mexico.

54. Mr. Patrick asked Mr. Dictson how he could get his job back.

55. Mr. Dictson suggested that Mr. Patrick contact the Governor's office.

56. Another Livestock Board Inspector drove Mr. Patrick from Roswell to his home in Carlsbad, New Mexico.

57. At the time of his termination, Mr. Patrick was not yet engaged in training for certification with the New Mexico Law Enforcement Academy.

58. On March 18, 2026, Mr. Patrick emailed Livestock Board Executive Director Belinda Garland, Defendant Barry Allen, and Human Resources Manager Stephanie Lujan, asking that the Livestock Board reconsider his termination.

59. On March 24, 2026, Executive Director Garland responded to Mr. Patrick's email.

60. In her email, Executive Director Garland stated that Mr. Patrick had accepted a Certified Law Enforcement position with the Livestock Board.

61. Executive Director Garland also stated that the position would have required Mr. Patrick to attend the Southern New Mexico Law Enforcement Academy ("Academy").

62. Executive Director Garland claimed that the Academy had "different grooming requirements" than the Livestock Board.

63. Executive Director Garland wrongly stated that Mr. Patrick was not terminated from the Livestock Board.

64. Executive Director Garland wrongly stated that Mr. Patrick "resigned and left without notifying upper management."

65. On March 24, 2026, Mr. Patrick responded to Executive Director Garland's email, giving further information about the meeting where Defendant Allen terminated him.

66. Mr. Patrick again requested that the Livestock Board reconsider its decision to terminate him.

67. Mr. Patrick never received a further response from Executive Director Garland.

68. On April 27, 2026, the Santa Fe New Mexican published a news story about Mr. Patrick's firing. *See* Phaedra Haywood, "Teen says he lost brand inspector job over his hair — a violation of Crown Act," Santa Fe New Mexican (April 27, 2026),

https://www.santafenewmexican.com/news/local_news/teen-says-he-lost-brand-inspector-job-over-his-hair-a-violation-of-crown-act/article_cc30440d-f267-486b-819f-95cd879446d3.html.

69. In the story, the Santa Fe New Mexican published this photo of a Livestock Board inspector with a long braid that extends far below the inspector's shoulders:

70. On July 29, 2026, Mr. Patrick filed a charge of discrimination with the Department of Workforce Solutions Human Rights Bureau.

71. On August 19, 2026, Mr. Patrick received an Order of Non-Determination from the Department of Workforce Solutions Human Rights Bureau.

72. This Order of Non-Determination permitted Mr. Patrick to appeal the Order by filing a Complaint "in the district court of the county where the alleged discriminatory practice occurred or where the respondent does business."

COUNT I
Unlawful Race-Based Discrimination under the New Mexico Human Rights Act

73. Mr. Patrick re-alleges and incorporates each paragraph above as if fully stated herein.

74. The Livestock Board is an employer under the New Mexico Human Rights Act. NMSA 1978, § 28-1-2(B).

75. At all times material, Mr. Patrick was an employee under the New Mexico Human Rights Act. NMSA 1978, § 28-1-2(E).

76. At all times material, Mr. Patrick was otherwise qualified for his employment as a Livestock Inspector.

77. Under the New Mexico Human Rights Act, it is unlawful for "an employer, unless based on bona fide occupation qualification or other statutory prohibition" to "discriminate . . . against any person otherwise qualified because of race." NMSA 1978, § 28-1-7(A).

78. Under the New Mexico Human Rights Act, it is unlawful for "an employer, unless based on bona fide occupation qualification or other statutory prohibition" to "discharge . . . any person otherwise qualified because of race." NMSA 1978, § 28-1-7(A).

79. Under the New Mexico Human Rights Act, "'race' includes traits historically associated with race, including hair texture, length of hair, [or] protective hairstyles." NMSA 1978, § 28-1-2(Z).

80. A "protective hairstyle" includes "locs." NMSA 1978, § 28-1-2(Y).

81. The Livestock Board and Defendant Allen discriminated against Mr. Patrick on the basis of his race—terminating his employment because he refused to cut his locs, a protective hairstyle. NMSA 1978, § 28-1-2(Y)–(Z).

82. The Livestock Board and Defendant Allen discriminated against Mr. Patrick because of his race when they discharged him from the Livestock Board, as prohibited by the New Mexico Human Rights Act. NMSA 1978, § 28-1-7(A).

83. The Livestock Board aided, abetted, incited, compelled, or coerced the discriminatory practice alleged in the preceding paragraphs, as prohibited by the New Mexico Human Rights Act. NMSA 1978, § 28-1-7(I)(1).

84. As a result of the aforementioned conduct, Mr. Patrick suffered actual damages.

85. As a result of the aforementioned conduct, Mr. Patrick is entitled to attorneys' fees.

86. Mr. Patrick has exhausted the New Mexico Human Rights Act grievance procedure. NMSA 1978, § 28-1-10(A).

87. Mr. Patrick has received an order of non-determination, entitling him to file this Complaint. NMSA 1978, §§ 28-1-10(D) and 28-1-13.

JURY DEMAND

Plaintiff respectfully demands a six-person jury.

PRAYER FOR RELIEF

Plaintiff respectfully seeks the following relief:

1. Actual damages, including back pay, front pay, costs, and all other appropriate damages;
2. Pre- and post-judgment interest;
3. Attorneys' fees and costs; and
4. Any further relief that this Court deems just and proper.

Dated: October 28, 2026

Respectfully submitted by:

/s/ Jazmyn Taitingfong
Jazmyn Taitingfong
Kristin Greer Love
Maria Martinez Sanchez
ACLU OF NEW MEXICO
P.O. Box 566
Albuquerque, NM 87103
T: (505) 633-1118
F: (505) 266-5916
JTaitingfong@aclu-nm.org
kglove@aclu-nm.org
msanchez@aclu-nm.org

Docusign Envelope ID: 1C86323A-88EF-8304-83D7-513C02D7B7FC

Department of Workforce Solutions
Human Rights Bureau
2600 Cerrillos Road, Santa Fe, NM 87505
Phone: (505) 827-6838 Fax: (505) 827-6878

NMAC 9.1.1.8(I) | **Order of Non-Determination**

August 19, 2026

Tiffany McCree
ACLU
PO Box 566
Albuquerque, NM 87103

Re: Christian Patrick vs. New Mexico Livestock Board /Barry Allen

Dear Christian Patrick:

As authorized by Section 28-1-10 (D) of the New Mexico Human Rights Act, this letter constitutes an **Order of Non-Determination** as to your Charge. Section 28-1-10 (D) of the Act permits any person who has filed a timely Charge with the Human Rights Bureau to request an Order of Non-Determination. Section 28-1-10 (D) also requires that the Director of the Bureau issue an Order of Non-Determination when a proper request for the Order is made.

By issuing this Order of Non-Determination, the Bureau has closed this Charge administratively, *with prejudice*. Therefore, you may not file this complaint again with this Bureau. You may obtain a new trial however, by appealing this Order of Non-Determination to the proper district court. According to Section 28-1-13 (A) of the New Mexico Human Rights Act, **you have ninety (90) days** from the date of service of this Order of Non-Determination to file notice of appeal in the district court of the county where the alleged discriminatory practice occurred or where the respondent does business.

The Bureau should not be named as a party to the appeal, unless you have an independent and separate claim against the Bureau. Section 28-1-13 (A) of the Act also requires that you serve a copy of the notice of appeal personally or by certified mail, return receipt requested, at the last known address of all parties. You also must serve a copy of the notice of appeal on the Bureau office in Santa Fe. To properly serve the parties, you must comply with any other service of process requirements set forth in the New Mexico Rules of Civil Procedure at 1-004.

EXHIBIT A

Docusign Envelope ID: 1C86323A-88EF-8304-83D7-513C02D7B7FC

Department of Workforce Solutions
Human Rights Bureau
2600 Cerrillos Road, Santa Fe, NM 87505
Phone: (505) 827-6838 Fax: (505) 827-6878

If you do not timely file a notice of appeal with the appropriate district court, and if you do not properly serve the notice, your right to appeal this order of non-determination to the district court will expire.

If you have any question concerning this Order, contact the Human Rights Bureau.

Signed by:
Brad Brister
84095DAAFDC5448...
Brad Brister, Deputy Director

cc: New Mexico Livestock Board
Attn: Human Resources
2105 Osuna Road NE
Albuquerque, NM 87113