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FILED
Superior Court Of California,
Sacramento
08/17/2012
Igutierrez2
By _____, Deputy
Case Number:
34-2012-00130209

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10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SACRAMENTO

DEPARTMENT
ASSIGNMENTS

Case Management 35
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11
12 JENNA DOEUK, ESRA JONES,
MONTHICA KEM & MICAELA LUCAS,

Case No.

13 Plaintiffs,

**COMPLAINT FOR TERMINATION IN
VIOLATION OF PUBLIC POLICY;
CONSTRUCTIVE TERMINATION IN
VIOLATION OF PUBLIC POLICY; SEXUAL
HARASSMENT—HOSTILE ENVIRONMENT;
FAILURE TO PREVENT SEXUAL
HARASSMENT; RETALIATION FOR
COMPLAINING OF SEXUAL HARASSMENT;
INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS; INVASION OF PRIVACY**

14
15 vs.

16 SCOTT JOHNSON, an individual;
DISABLED ACCESS PREVENTS
17 INJURY, INC., a California corporation;
and DOES 1 through 10, inclusive
18 Defendants.

**REQUEST FOR PUNITIVE DAMAGES
DEMAND FOR A JURY TRIAL**

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22 Comes now Jenna Doeuk ("DOEUK"), ESRA JONES, ("JONES"), MONTHICA KEM
23 ("KEM") AND MICAELA LUCAS ("LUCAS") collectively the "PLAINTIFFS" who hereby
24 allege as follows.

- 25
26 1. PLAINTIFFS are citizens of California, residing in Sacramento County.
27 2. Defendant DISABLED ACCESS PREVENTS INJURY, INC. ("DISABLED
28 ACCESS"), is a corporation incorporated under the laws of the State of California.

1 3. PLAINTIFFS are informed and believe that Defendant SCOTT JOHNSON
2 ("JOHNSON") is the sole shareholder of DISABLED ACCESS. Collectively
3 Defendant JOHNSON and DISABLED ACCESS shall be referred to herein as
4 "DEFENDANTS".

5 4. PLAINTIFFS do not know the true names and capacities of defendants Does 1
6 through 10 inclusive, and therefore sues them by those fictitious names.

7 PLAINTIFFS are informed and believe, and on that basis allege, that each of the
8 defendants named as a Doe was in some manner responsible for the injury and
9 damage suffered by PLAINTIFFS as alleged in this complaint. PLAINTIFFS are
10 informed and believe, and on that basis allege, that each of the defendants was
11 the agent and employee of their codefendants, and each of them, and in doing the
12 things alleged in this complaint was acting within the scope of that agency or
13 employment. When the identity of any of the DOE defendants become known to
14 PLAINTIFFS, PLAINTIFFS will properly amend the Complaint to reflect the true
15 name of the DOE.

16 5. Each act complained of herein was performed or ratified by an officer, director,
17 and/or agent of the DEFENDANTS and was done with malice, oppression, and/or
18 fraud entitling PLAINTIFF to punitive and exemplary damages under California
19 Civil Code Section 3294.

20 6. Plaintiff DOEUK worked for DEFENDANTS as a legal assistant from September
21 2007, until she was wrongfully terminated on June 19, 2012.

22 7. Plaintiff KEM was hired by DEFENDANTS in September 2008 and was
23 constructively terminated on August 9, 2012.

24 8. Plaintiff JONES was hired by DEFENDANTS in December 2007 and was
25 constructively terminated on August 9, 2012.

26 9. Plaintiff LUCAS was hired by DEFENDANTS on February 8, 2011, and was
27 constructively terminated on August 9, 2012.

28 10. JOHNSON had and indeed exercised supervisory duties and had managerial

1 discretion over and in regard to all PLAINTIFFS.

2 11. PLAINTIFFS worked for DEFENDANTS as legal assistants.

3 12. PLAINTIFFS have exhausted their administrative obligations with the Department
4 of Fair Employment and Housing. Their Complaints and Right to Sue letters are
5 attached as Exhibits A—D.

6 13. DEFENDANTS' office is located in JOHNSON'S home. The house has been
7 renovated to accommodate desks and other office items on the first floor.

8 14. DEFENDANTS have no Anti-Harassment Policy and no reporting structure in
9 place for employees if they have workplace complaint.

10 15. When each of the PLAINTIFFS started working for DEFENDANTS, they were
11 forced to go through "personal care" training. The purpose of this training was to
12 help care for JOHNSON if his personal assistant was absent.

13 16. As part of the personal care training, each of the PLAINTIFFS would have to
14 arrive early and help JOHNSON get out of bed.

15 17. They were forced to take off JOHNSON'S underwear and put on his swim trunks,
16 during which JOHNSON'S genitals were exposed.

17 18. PLAINTIFFS then would take him to the hot tub. When he was finished in the hot
18 tub, the PLAINTIFFS would take him back to his bedroom, take off his wet swim
19 trunks, dry him off, put lotion on him, and then get him dressed.

20 19. The personal care training forced PLAINTIFFS to touch JOHNSON and see his
21 genitals. This personal care training made each PLAINTIFF uncomfortable but
22 they were afraid to complain because they thought that they would be retaliated
23 against and be fired. In addition, PLAINTIFFS are not required to report
24 harassment to the harasser himself. There is no other reporting structure in
25 place.
26

27 20. JOHNSON would determine when the PLAINTIFFS had learned the personal care
28 routine to his satisfaction. Therefore, he decided arbitrarily when PLAINTIFFS

1 would be released from the personal care duties and permitted to work in the
2 position that they were hired for, namely being a legal assistant. Personal care
3 training usually lasted approximately two weeks.

4 21. JOHNSON also requires the PLAINTIFFS to help him change his clothes. When
5 he returns from Court or a meeting, he wants to take off his dress shirt and put on
6 a more comfortable shirt. This requires PLAINTIFFS to touch JOHNSON; he also
7 puts his arms around their waists when they tuck the shirt down his back. When
8 he puts his arms around the PLAINTIFFS his head comes in contact with their
9 breasts. JOHNSON has required PLAINTIFFS to do this since each of them
10 started working for DISABLED ACCESS.

11 22. PLAINTIFFS are very uncomfortable changing JOHNSON'S shirt and often try to
12 leave the office area when he returns so that they do not get "picked" to help him
13 change. PLAINTIFFS are afraid to tell JOHNSON that they are uncomfortable
14 having to touch JOHNSON and change his clothes because they fear retaliation
15 for making a complaint. In addition, PLAINTIFFS are not required to report
16 harassment to the harasser himself and there is no other reporting structure in
17 place.

18 23. DEFENDANTS have cameras throughout the office. There is a camera directly
19 aimed at each PLAINTIFF.

20 24. There are very large flat screen TVs in the office manager's office (62") and in
21 JOHNSON'S bedroom (70") that have footage from every camera in the house.
22 PLAINTIFFS are constantly watched by JOHNSON.

23 25. JOHNSON has an "app" on his phone that permits him to watch the cameras from
24 remote locations. Indeed, on more than one occasion, although he was out of the
25 office on vacation, he has called the office to complain about something that he
26 saw on the camera footage.

27 26. The camera above DOEUK'S work station was aimed directly at her breasts. She
28

1 did go to JOHNSON and said that the position of the camera made her
2 uncomfortable. The camera was adjusted but DOEUK was monitored closely
3 after complaining.

4 27. DEFENDANTS also put a camera aimed at the restroom because JOHNSON said
5 that the PLAINTIFFS were taking too long when they went to the restroom.

6 28. DOEUK confronted JOHNSON about the camera aimed at the restroom. He said
7 that he placed it there because they were taking too long to go to the bathroom.
8 He asked DOEUK: "How long does it take you to go to the bathroom. It would
9 take the most time if you were going 'number two.' How long does it take you to
10 go 'number two'"? DOEUK was very uncomfortable with the questioning from
11 JOHNSON.

12 29. PLAINTIFFS, as part of their job, were forced to perform "field work." For this field
13 work, PLAINTIFFS first must help JOHNSON get into his van. They are forced to
14 strap in his wheelchair. When they do this, their bodies, including their breasts,
15 come in contact with JOHNSON'S body. PLAINTIFFS are very uncomfortable
16 performing this task but they are afraid to complain for fear of retaliation.

17 30. JOHNSON is perfectly capable of driving the van, which has been modified to
18 allow him to drive.

19 31. PLAINTIFFS were so uncomfortable going in the van alone with JOHNSON
20 because of the way that he would stare at them that they asked if two of them
21 could do field work together with him. They felt more comfortable going with a co-
22 worker rather than being alone with JOHNSON.

23 32. During field work, PLAINTIFFS were forced to go into businesses with which they
24 have no connection and do not need the services of to see if the business is in
25 compliance with ADA regulations. PLAINTIFFS were required to go in to the
26 business under the ruse that they are seeking the business' goods and/or
27 services. They were also required to ask to use the restroom to determine if the
28

1 restroom was compliant with the ADA regulations.

2 33. PLAINTIFFS were forced to enter "sex stores" such as Suzie's Adult Superstore
3 and Adam and Eve.

4 34. PLAINTIFFS were forced to enter bars and have had sexual comments made to
5 them by the male customers. PLAINTIFFS told JOHNSON what had happened in
6 the bar and he simply laughed.

7 35. The majority of the time, JOHNSON did not enter the business. He stayed in the
8 van and waited for a report from the PLAINTIFFS.

9 36. PLAINTIFFS also performed field work at hotels. JOHNSON rented a hotel room
10 and PLAINTIFFS were forced to sit in the hotel room with JOHNSON for one hour
11 or so before they left. PLAINTIFFS were very uncomfortable entering a hotel
12 room with JOHNSON.

13 37. JOHNSON also made JONES feed him when he was driving the van. This
14 required JONES to reach completely across JOHNSON'S body to the point that
15 she had to unbuckle her seatbelt. Her fingers would come in contact with
16 JOHNSON'S mouth during this process. JOHNSON could have easily pulled the
17 van over and fed himself, but he instead wanted JONES to feed him while he was
18 driving. This made JONES incredibly uncomfortable but JONES had no one to
19 whom she could complain.

20 38. PLAINTIFFS were very uncomfortable performing field work because they were
21 going into a business under a ruse—they wanted nothing from the business.
22 They felt as though they were committing fraud; however, if they did not perform
23 this work, their pay was effected—they lost an opportunity to get a bonus.

24 39. PLAINTIFFS believe that JOHNSON was constantly staring at them in a sexual
25 way. On one day, KEM went to go get JOHNSON coffee, and she felt that
26 JOHNSON was looking at her buttocks. She told a co-worker this. The next thing
27 that she knew, JOHNSON took her out on the patio, the only place that has no
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- 1 digital recording devices, and asked KEM if she had told a co-worker that she
2 thought that JOHNSON was staring at her buttocks. She admitted that she had.
3 JOHNSON' S reply was, "Well am I supposed to just pretend that I did not see it?"
4 40. Such a statement by JOHNSON demonstrates that the sexual harassment is on-
5 going.
- 6 41. JOHNSON has had calendars on his walls that featured women in very skimpy
7 swimsuits. These calendars offended PLAINTIFFS, but they had no one to
8 complain to.
- 9 42. JOHNSON often mentioned that his favorite restaurant is HOOTERS. He added
10 that Sacramento has 8 Hooters Restaurants—the only city in the country with 8
11 restaurants.
- 12 43. JOHNSON liked to talk about how he would like to get an Asian mail-order bride.
- 13 44. DOEUK has been on the hiring committee at DISABLED ACCESS and read
14 resumes and interviewed applicants. JOHNSON instructed her to make two piles,
15 the "good" pile and the "bad" file. JOHNSON would then review the individuals in
16 the "good" pile.
- 17 45. Before DOEUK began the interview process, JOHNSON told her not to bring in
18 any of the following groups in for an interview, no matter how qualified the person
19 might be: men, ugly women, and anyone over thirty.
- 20 46. When JOHNSON began visiting apartment complexes as part of his field work, he
21 instructed the PLAINTIFFS to engage in another ruse so that he could claim that
22 he had a financial interest in the apartment complex.
- 23 47. JOHNSON told LUCAS to call around to neighbor community colleges to see if
24 any disabled students needed help with their rent if they lived in a complex that he
25 was interested in suing.
- 26 48. LUCAS was also told to place an advertisement in "Disabled Dealer," a legitimate
27 resource for disabled individuals, seeking disabled students who needed
28

1 assistance with their rent if they lived in a complex that he was interested in suing.
2 49. LUCAS was able to locate about 12 students whom JOHNSON sends
3 approximately \$100 or \$150 per month to put toward rent.
4 50. At one point, JOHNSON asked one of the students to whom he sends money to
5 sign a Declaration. The student responded that, had it be known that the money
6 came with a motive, the student would not have taken it.
7 51. PLAINTIFFS were asked at various times to complete homework for JOHNSON'S
8 son. They wrote papers and completed projects.
9 52. There have been numerous times in which PLAINTIFFS, while driving JOHNSON
10 on field work, that he would simply name a business, apartment complex or other
11 entity. Just the act of "driving by" JOHNSON called that a "personal encounter" in
12 his complaints and other documents. The next time that he visited the property,
13 more often than not he simply sent in one of the PLAINTIFF'S to look for ADA
14 violations and to purchase something, if the business sold goods, and to ask to
15 use the bathroom. He would call such actions by the PLAINTIFFS a "visit" to the
16 property even if he never left the van.
17 53. Prior to her wrongful termination, DOEUK was suspended from her job as a result
18 of bringing up many of the issues in this complaint to JOHNSON.
19 54. Recently, during their performance evaluations, JOHNSON demanded that
20 LUCAS, JONES, and KEM sign a document that stated that nothing that has
21 happened during their employment has violated their rights and that everything is
22 fine and fair in the workplace. LUCAS and JONES, at first, refused to sign the
23 document. At that point, JOHNSON threatened to take away their ability to earn
24 bonuses based upon the number of complaints that they can get filed within a
25 certain period of time. LUCAS and JONES, with their livelihood threatened,
26 signed the document but added several caveats after their signatures. KEM also
27 felt that she had no choice but to sign the document because, if she did not sign it,
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1 she thought that she would be fired.

2 **FIRST CAUSE OF ACTION BY DOEUK ONLY**
3 **AGAINST DISABLED ACCESS AND DOES 1 TO 10 INCLUSIVE**
4 **FOR TERMINATION**
5 **IN VIOLATION OF PUBLIC POLICY**

6 55. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 to 54, *supra*, as if
7 fully set forth here.

8 56. Prior to her wrongful termination, DOEUK was suspended from her job as a result
9 of bringing up many of the issues set forth in this complaint to JOHNSON.

10 57. DOEUK was wrongfully terminated on June 19, 2012, in violation of the
11 established public policy associated with the following California specific California
12 statutes: Government Code Sections 12940 et seq. and the California
13 Constitution. DOEUK has also been wrongfully terminated under other California
14 statutes according to proof.

15 58. DOEUK has been damaged by her wrongful termination in that she has suffered a
16 loss of income and suffers from anxiety and other physical and emotional
17 symptoms as the direct result of the DEFENDANT'S wrongful termination of
18 DOEUK.

19 **SECOND CAUSE OF ACTION BY JONES, KEM & LUCAS ONLY**

20 **AGAINST DISABLED ACCESS AND DOES 1 TO 10 INCLUSIVE,**
21 **FOR CONSTRUCTIVE TERMINATION**
22 **IN VIOLATION OF PUBLIC POLICY**

23 59. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 through 58, *supra*, as if
24 fully set forth.

25 60. JONES, KEM, & LUCAS worked in unlawful, intolerable conditions, as set forth in this
26 Complaint. Indeed, the conditions in which JONES, KEM & LUCAS were forced to
27 work in were both subjectively and objectively intolerable. A reasonable person would
28

1 have no choice but to resign. As such, JONES, KEM, & LUCAS, due to the intolerable
2 conditions, had no choice but to resign from their positions.

3 61. PLAINTIFFS have been constructively terminated in violation of the following California
4 specific California statutes: Government Code Sections 12940 et seq. as well as the
5 California Constitution, Article I, Section I. DEFENDANTS have also constructively
6 terminated JONES, KEM & LUCAS under other California statutes and the common law
7 according to proof.

8 62. JONES, KEM & LUCAS have been damaged by their constructive terminations in that
9 they suffered a loss of income and suffer from anxiety, depression, and other physical and
10 emotional symptoms as the direct result of DEFENDANTS' unlawful activities that forced
11 them to resign.

12 **THIRD CAUSE OF ACTION BY PLAINTIFFS**
13 **AGAINST DEFENDANTS AND DOES 1 TO 10 INCLUSIVE,**
14 **SEXUAL HARASSMENT—HOSTILE ENVIRONMENT UNDER**
15 **THE FAIR EMPLOYMENT AND HOUSING ACT**

16
17 63. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 to 62, *supra*, as if
18 fully set forth here.

19 64. PLAINTIFFS, females, belong to a protected class as such is defined under
20 California's Fair Employment and Housing Act ("FEHA"). CAL. GOVT CODE §
21 12940 *et seq.*

22 65. PLAINTIFFS were subject to daily sexual harassment from the day that they
23 began working for DEFENDANTS.

24 66. Indeed, JOHNSON made PLAINTIFFS "cross train" as personal care assistants,
25 although none of them have any experience in this field, and see JOHNSON, their
26 supervisor naked; they were forced to rub lotion on him; and they were forced to
27 get him dressed.
28

1 67. The harassment continued when JOHNSON would make the PLAINTIFFS come
2 into his office and help change his shirt or buckle him into the van, as these
3 activities made their breasts and torsos touch JOHNSON.

4 68. JOHNSON also made frequent sexual comments in the workplace.

5 69. JOHNSON has sexual calendars hanging in plain sight.

6 70. JOHNSON would also stare at PLAINTIFFS' breasts and buttocks.

7 71. This harassment is unwelcome to all PLAINTIFFS.

8 72. This harassment would be objectively offensive to a reasonable person and was
9 objectively offensive to PLAINTIFFS.

10 73. The harassment has been on-going since each PLAINTIFF started working for
11 DISABLED ACCESS and it is so severe and pervasive that it has altered the
12 terms and conditions of each PLAINTIFF'S work.

13 74. DISABLED ACCESS has no Anti-Harassment Policy and no complaint structure
14 that PLAINTIFFS could have utilized. Their only recourse was to complain to their
15 harasser, which the law does not require.

16 **FOURTH CAUSE OF ACTION BY PLAINTIFFS**

17 **AGAINST DISABLED ACCESS AND DOES 1-10 INCLUSIVE**

18 **FOR FAILURE TO PREVENT SEXUAL HARASSMENT**

19 **UNDER SECTION 12940(k) OF THE FEHA**

20 75. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 through 74, *supra*,
21 as if fully set forth here.

22 76. Under the FEHA, section 12941(k), there is an independent cause of action that
23 can be brought against an employer that fails to take reasonable steps to prevent
24 sexual harassment from occurring.

25 77. In this case, DISABLED ACCESS had no Policy or complaint structure in place
26 that would have allowed it to take action to ensure that the working environment
27 was not permeated with sexual harassment and/or to rid the environment of the
28

1 unlawful harassment. Thus DISABLED ACCESS did not fulfill its statutory duty to
2 prevent sexual harassment as is required by the FEHA.

3 78. PLAINTIFFS have been damaged by DISABLED ACCESS' failure to prevent and
4 then cure the sexually hostile environment in that suffer from anxiety and other
5 physical, mental, and emotional symptoms as the direct result of DISABLED
6 ACCESS' statutory failures.

7 **FIFTH CAUSE OF ACTION BY PLAINTIFFS**

8 **AGAINST DISABLED ACCESS AND DOES 1-10 FOR**

9 **RETALIATION IN VIOLATION OF THE FEHA**

10 79. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 through 78, *supra*,
11 as if fully set forth here.

12 80. The FEHA prohibits an employer from retaliating against any individual who
13 makes or has made a complaint of unlawful harassment. CAL. GOVT CODE §
14 12940(h).

15 81. PLAINTIFFS complained about the unlawful harassment that they endured.

16 82. After making such complaints, DOEUK was suspended and then terminated.
17 DOEUK'S termination was directly related to her complaints about unlawful
18 conduct. Furthermore, after making such comments, LUCAS, KEM, and JONES
19 were treated differently from other employees.

20 83. PLAINTIFFS have been damaged by the DEFENDANTS' conduct in that they
21 were terminated or constructively terminated from their positions and suffer from
22 anxiety and other physical, mental, and emotional symptoms as the direct result of
23 the DEFENDANT'S conduct

24 **SIXTH CAUSE OF ACTION BY PLAINTIFFS**

25 **AGAINST DEFENDANTS AND DOES 1-10 INCLUSIVE**

26 **FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

27 84. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 through 83, *supra*,
28 as if fully set forth here.

- 1 85. DEFENDANTS engaged in the conduct as set forth in this complaint.
- 2 86. Indeed, DEFENDANTS have sent PLAINTIFFS into businesses or other
- 3 commercial entities and forced them to pretend that they needed the goods or
- 4 services of that business. They were also instructed to request to use the
- 5 restroom and take pictures of the business overall.
- 6 87. PLAINTIFFS knew that the information that they were collecting would be used by
- 7 DEFENDANTS to threaten to sue or to sue the businesses or other commercial
- 8 entities for ADA violations.
- 9 88. PLAINTIFFS felt as though they were acting in a fraudulent manner that was
- 10 setting these businesses up for costly litigation.
- 11 89. By engaging in the conduct set forth in this Complaint, DEFENDANTS and others
- 12 acted extremely, outrageously, and beyond the bounds of all civilized
- 13 behavior/conduct. Such extreme and outrageous conduct was committed with the
- 14 intention of causing, or reckless disregard of the probability of causing, emotional
- 15 distress to the PLAINTIFFS.
- 16 90. By virtue of DEFENDANTS' and others' conduct the PLAINTIFFS have suffered
- 17 severe and extreme emotional distress in that they suffer from anxiety, and other
- 18 physical, mental, and emotional symptoms.
- 19 91. It is foreseeable that conduct, such as that alleged in this Complaint, would cause
- 20 extreme and severe emotional distress to anyone who is victimized by such
- 21 conduct, such as the PLAINTIFFS.
- 22 92. The conduct alleged in this Complaint did, in fact, cause PLAINTIFFS to suffer
- 23 severe and extreme emotional distress.
- 24 93. PLAINTIFFS have been damaged by the DEFENDANTS' conduct in that DOEUK
- 25 was terminated from her position and that JONES, KEM & LUCAS were
- 26 constructively terminated from their positions. All PLAINTIFFS suffer from
- 27 anxiety, and other physical, mental, and emotional symptoms as the direct result
- 28 of the DEFENDANTS' conduct.

SEVENTH CAUSE OF ACTION BY PLAINTIFFS
AGAINST DEFENDANTS AND DOES 1 TO 10 INCLUSIVE FOR
INVASION OF PRIVACY UNDER THE CALIFORNIA
CONSTITUTION, ARTICLE I, SECTION 1 AND THE COMMON LAW

94. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 through 93, *supra*, as if fully set forth here.

95. PLAINTIFFS have a reasonable expectation of privacy in the workplace. Even when told, however, that cameras would be installed in the office, the amount of cameras and the extent of the monitoring by DEFENDANTS was not reasonable and would be offensive to a reasonable person. It was subjectively offensive to PLAINTIFFS

96. JOHNSON monitored the workplace from his bedroom on a 72 inch television and could monitor the work areas from remote locations. Each PLAINTIFF had a camera pointed directly at her. For a period of time, DOEUK'S camera had been pointed at her breasts.

97. Until DOEUK complained, there was a camera pointed at the bathroom which allowed JOHNSON to monitor how long each employee spent using the restroom.

98. The manner in which each of the PLAINTIFF'S privacy was violated would be highly offensive to a reasonable person. It was highly offensive to PLAINTIFFS.

99. Based upon the invasion of privacy endured by PLAINTIFFS, PLAINTIFFS have been injured in that they have had their privacy invaded and have suffered anxiety and other physical, mental, and emotional symptoms.

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PRAYER FOR RELIEF

100. PLAINTIFFS re-allege all allegations set forth in paragraphs 1 through 99, *supra*, as if fully set forth here.

101. PLAINTIFFS pray for the following relief:

- a. Special damages in an amount to be proven at trial but in an amount within the jurisdiction of this Court;
- b. General damages in an amount to be proven at trial but in an amount within the jurisdiction of this Court;
- c. Punitive damages in an amount to be proven at trial as permitted by law;
- d. Economic damages in an amount to be proven at trial but in an amount within the jurisdiction of this Court;
- e. Compensatory damages in an amount to be proven at trial but in an amount within the jurisdiction of this Court;
- f. Attorney's fees and costs of suit;
- g. An injunction enjoining DEFENDANTS and each of them, from continuing to engage in the conduct alleged in this Complaint;
- h. Any other relief the Court deems appropriate.

DATED: August 15, 2012

PETERS LAW, INC.



JORDAN T.L. PETERS

Attorney for Plaintiffs: Jenna Doeuk, Esra Jones, Micaela Lucas, and Monthica Kem

EXHIBIT A



STATE OF CALIFORNIA STATE AND CONSUMER SERVICES AGENCY

GOVERNOR EDWARD G. BROWN JR

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR PHYLLIS C. CHENG

2275 Kausen Lane, Suite 100, Elk Grove, CA 95755
(916) 634-1634 | Voicephone (916) 226-5285 | TDD (916) 709-2070
www.dfeh.ca.gov | email: cc.cheng@dfeh.ca.gov

August 09, 2012

Jenna Doeuk
915 Highland Pointe Drive Suite 150
Roseville, CA 95678

RE: 25352-12630 - Doeuk Jenna - Right To Sue

Notice of Case Closure and Right to Sue

Dear Jenna Doeuk:

This letter informs you that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective August 09, 2012 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

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.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

Department of Fair Employment and Housing

cc: Lawyers Incorporating Service, Agent for Service for Disabled Access Prevents Injury, Inc.

Scott Johnson



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

25352-12630

COMPLAINANT NAME
Jenna Doeuk

PHONE NUMBER
(916) 434-6740

ADDRESS
915 Highland Pointe Drive Suite 150

CITY STATE ZIP
Roseville CA 95678

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME

EMPLOYER NAME
Disabled Access Prevents Injury, Inc.

EMPLOYER ADDRESS
Lawyers Incorporating Service

EMPLOYER ADDRESS
2710 Gateway Oaks Dr. Ste 150N

CITY STATE ZIP
Sacramento, CA 95833

COMPLAINT DATE
7

DATE OF DISCRIMINATION
Jun 19, 2012

EMPLOYER TYPE
Private Employer

CO-RESPONDENTS

NAME ADDRESS CITY STATE ZIP
Scott Johnson 5124 Kovanda Avenue Carmichael CA 95603

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right to sue. I understand that if I were a hired right to sue matter, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 90 days of receipt of the DFEH "Notice of Case Closure and Right to Sue," or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been advised into making this request, nor do I have a right to sue based on legal interpretation. I do not to sue. I understand that the Department of Fair Employment and Housing's policy is not process or receive a complaint once the complaint has been closed on the basis of "Discrimination Election Case Action."

By signing this complaint, I am declaring under penalty of perjury under the laws of the State of California that to the best of my knowledge, all information contained in this complaint is true and correct, except where noted on my information and belief, and I declare that those matters I believe to be true.

DATE: August 09, 2012 At Roseville SIGNATURE: Jordan Peters, attorney for complainant

DFEH-300-030 (07/12)
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

DATE: Aug 09, 2012

STATE OF CALIFORNIA



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

ALLEGED VIOLATION: INTERFERENCE WITH
Harassment, Retaliation

DATE OF VIOLATION: Jun 19, 2012

DISCRIMINATION BASIS: Sex- Gender
AGE- RACE
RELIGION

ADVERSE ACTION: Denied a work environment free of discrimination and/or retaliation, Terminated, Other
Suspended, failure to prevent harassment, hostile sexual harassment environment;

STATEMENT OF VIOLATION TO BE PRESENTED TO THE BOARD OF ADJUDICATION:

I was forced to work in an environment in which sexual harassment occurred daily. My boss began my employment making me dress nude, and, throughout my employment placed me in situations where my body would come into contact with his. He made constant sexual remarks and stared at my body. There was no Anti-Discrimination Policy and no reporting structure in place.

EXHIBIT B



STATE OF CALIFORNIA - STATE AND CONSUMER SERVICES AGENCY

Governor EDWIN G. BROWN, JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR PHYLIS W. CHENG

3218 Kansas Drive, Suite 109, El Cerrito, CA 94750
(EEO) 534-1684; Videophones (816) 226-9235; TDD (503) 730-2920
www.dfeh.ca.gov; e-mail: contact@dfeh.ca.gov

August 09, 2012

Esra Jones
915 Highland Pointe Drive Suite 250
Roseville, CA 95678

RE: 25309-12610-R - Jones Esra - Right To Sue

Notice of Case Closure and Right to Sue

Dear Esra Jones:

This letter informs you that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective August 09, 2012 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

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.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

Department of Fair Employment and Housing

cc: Lawyers Incorporating Service Agent for Service for Disability Access Prevents Injury, Inc.

Scott Johnson



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DOCKET NUMBER: 25309-12610-R

COMPLAINANT NAME
Esra Jones

TELEPHONE NUMBER
(916) 434-0740

ADDRESS
915 Highland Pointe Drive Suite 250

CITY AND STATE
Roseville CA 95678

NAMED IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

HUSBAND/EMPLOYEE
Disability Access Prevents Injury, Inc

ROBERT PETERSON/EMPLOYEE
Lawyers Incorporating Service

ADDRESS/AGENCY FOR SERVICE
2710 Gateway Oaks Drive Suite 150N

CITY AND STATE
Sacramento, CA 95833

DATE OF DISCRIMINATION
?

DATE OF LAST RECEIVED COMPLAINT FROM EMPLOYEE
Aug 09, 2012

TYPE OF EMPLOYER
Private Employer

DISCRIMINATION:

NAME ADDRESS CITY AND STATE
Scott Johnson 5124 Kovanda Avenue Carmichael CA 95608

I want to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right to sue. I understand that if I want a federal right to sue, I must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 90 days of receipt of the JFEH Notice of Conc. Closure and Right to Sue, or within 300 days of the alleged discriminatory act, whichever is earlier.

I have not been advised in writing that this request may be denied based on fear of retaliation if I do not do so. I understand that the Department of Fair Employment and Housing will not process or reopen a complaint once the complaint has been closed on the basis of "Complainant Elected Conc. Action."

By submitting this complaint, I am declaring under penalty of perjury under the laws of the State of California that, to the best of my knowledge, all information contained in this complaint is true and correct, except where noted on any information and belief, and I declare that these matters I believe to be true.

Filed: August 09, 2012 At Roseville Filed By: Jordan Peters, Attorney for Complainant

DFEH-300-030 (07/12)
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

FILED: Aug 09, 2012
COMPLAINT: Aug 09, 2012

STATE OF CALIFORNIA



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

CHARGE(S) EXPERIENCED
Harassment, Retaliation

DATE OF ACT Aug 09, 2012

DISCRIMINATED BY Sex- Gender
APPLICANT
45-00-00

AGGRIEVED BY Denied a work environment free of discrimination and/or retaliation. Forced to quit, Other
Put on probation, failure to prevent harassment, hostile sexual harassment

STATEMENT CONCERNING THE ACT AND A WORKING WITH YOU

I was forced to work in an environment in which sexual harassment occurred daily. My boss began my employment making me dress him, and, throughout my employment placed me in situations where my body would come into contact with his. He made constant sexual remarks and stared at my body. There was no Anti-Discrimination Policy and no reporting structure in place.

EXHIBIT C



STATE OF CALIFORNIA - STATE AND CONSUMER SERVICES AGENCY

GOVERNOR EDWARD G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR PHYLLIS W. CHENG

7218 Mission Drive, Suite 100 • El Cerrito, CA 94733
(503) 694-7904 • Videophone (716) 223-8265 • TDD (415) 730-2300
www.dfeh.ca.gov email: contact_center@dfeh.ca.gov

August 09, 2012

Monthica Kem
915 Highland Pointe Drive Suite 250
Roseville, CA 95678

RE: 25357-12635 - Kem Monthica - Right To Sue

Notice of Case Closure and Right to Sue

Dear Monthica Kem:

This letter informs you that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective August 09, 2012 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

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.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

Department of Fair Employment and Housing

cc. Lawyer Incorporating Service, Agent for Service for Disabled Access Prevents Injury, Inc.

Scott Johnson



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

TELEPHONE NUMBER
25357-12635

COMPLAINANT NAME
Monhica Kern

TELEPHONE NUMBER
(916) 434-6743

ADDRESS
915 Highland Pointe Drive Suite 259

CITY AND STATE
Roseville CA 95678

NAME OF THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME.

EMPLOYER NAME
Disabled Access Prevents Injury, Inc.

EMPLOYER TYPE
Lawyer Incorporating Service

TELEPHONE NUMBER

ADDRESS FOR SERVICE
2710 Gateway Oaks Drive, Suite 150N

CITY AND STATE
Sacramento, CA 95833

DATE OF ALLEGED DISCRIMINATION
7

DATE AND APPROXIMATE SOURCE OF INFORMATION RECEIVED
Aug 09, 2012

EMPLOYER TYPE
Private Employer

CORRESPONDENTS:

NAME
Scott Johnson

ADDRESS
5124 Kovanda Ave. Carmichael CA 95608

TELEPHONE NUMBER

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right to sue. I understand that I need a federal right to sue notice. I must file the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH notice of Case Closure and Right to Sue or within 180 days of the alleged discriminatory act, whichever is earlier.

I have not been accused into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Complainant elected Court Action."

By submitting this complaint, I am declaring under penalty of perjury under the laws of the State of California that, to the best of my knowledge, all information given herein is true and correct, except numbers stated on my information and belief, and I declare the above matters I believe to be true.

Dated: August 09, 2012 At Roseville Signed By: Jordan Peters, attorney for complainant

DFEH-300-033 (07/12)
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

DATE FILED: Aug 09, 2012
FILED BY: Aug 09, 2012

STATE OF CALIFORNIA



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

OFFICE OF THE DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Harassment, Retaliation

FILED 08/09/12 Aug 09, 2012

REASON(S) OF DISCRIMINATION: Sex-Gender
DATE OF DISCRIMINATION: 08/09/12
PERIOD OF DISCRIMINATION: 08/09/12

ADVERSE EFFECT(S): Denied a work environment free of discrimination and/or retaliation, Forced to quit, Other failure to prevent harassment, hostile sexual harassment environment

STATEMENT OF THE COMPLAINANT:

I was forced to work in an environment in which sexual harassment occurred daily. My boss began my employment making me dress him, and, throughout my employment placed me in situations where my body would come into contact with his. He made constant sexual remarks and stared at my body. There was no Anti-Discrimination Policy and no reporting structure in place.

EXHIBIT D



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR PHYLIS W. CHENG

2215 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 834-1664 | Telephone (510) 226-5265 | TDD (209) 700-2360
www.dfeh.ca.gov | contactcenter@dfeh.ca.gov

August 09, 2012

Micaela Lucas
915 Highland Pointe Drive Suite 250
Roseville, CA 95678

RE: 25360-12636 - Lucas Micaela - Right To Sue

Notice of Case Closure and Right to Sue

Dear Micaela Lucas:

This letter informs you that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective August 09, 2012 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

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.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,

Department of Fair Employment and Housing

cc: Lawyers Incorporating Service, Agent for Service for Disabled Access Prevents Injury, Inc.

Scott Johnson



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
25360-12636

COMPLAINANT NAME
Micaela Lucas

DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
(916) 434-8740

ADDRESS
915 Highland Pointe Drive Suite 250

ROSEVILLE OFFICE
Roseville, CA 95678

NAMED (IS THE EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME:

EMPLOYER NAME
Disabled Access Provents Injury, Inc.

ADDRESS OF EMPLOYER, PERSON, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, OR STATE OR LOCAL GOVERNMENT AGENCY
Lawyers (Incorporating Service

EMPLOYER ADDRESS

ADDRESS OF COMPLAINANT
2710 Gateway Oaks Drive Suite 150N

ADDRESS OF COMPLAINANT
Sacramento, CA 95833

DATE OF ALLEGED DISCRIMINATION
7

DATE OF RECEIPT OF COMPLAINT BY THE DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Aug 09, 2012

STATUS OF EMPLOYER
Private Employer

COMPLAINANT SIGNATURE

NAME
Scott Johnson

ADDRESS
5124 Kovanda Ave. Carmichael CA 95608

DATE OF SIGNATURE

I wish to pursue this matter in court. I hereby request that the Department of Fair Employment and Housing provide a right to sue letter and that if I want a federal right to sue notice, I must first file a charge with the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of the DFEH "Notice of Case Closure and Right to Sue" or within 180 days of the alleged discriminatory act, whichever is earlier.

I have not been coerced into making this request, nor do I make it based on fear of retaliation if I do not do so. I understand it is the Department of Fair Employment and Housing's policy to not process or reopen a complaint once the complaint has been closed on the basis of "Completed Elected Court Action."

By submitting this complaint, I am declaring under penalty of perjury under the laws of the State of California that, to the best of my knowledge, all information contained in this complaint is true and correct, except matters stated on my information and belief, and I declare under these matters I believe to be true.

Date: August 09, 2012 At Roseville Signed by: Jordan Peters, attorney for complainant

DFEH-300 030 (07/12)
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

DATE RECEIVED: Aug 09, 2012
DATE FILED: Aug 09, 2012

STATE OF CALIFORNIA

Page 1/2



CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
EMPLOYMENT

COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

DATE OF COMPLAINT: [REDACTED]
Harassment, Retaliation

DATE RECEIVED: Aug 09, 2012

DATE OF DISCRIMINATION: Sex- Gender

DATE OF DISCRIMINATION: [REDACTED]

DATE OF DISCRIMINATION: [REDACTED]

DATE OF DISCRIMINATION: [REDACTED]

Denied a work environment free of discrimination and/or retaliation, Forced to quit, Other
Put on probation, failure to prevent harassment, hostile sexual harassment environment

DATE OF DISCRIMINATION: [REDACTED]

I was forced to work in an environment in which sexual harassment occurred daily. My boss began my employment making me dress him, and throughout my employment placed me in situations where my body would come into contact with his. He made constant sexual remarks and stared at my body. There was no Anti-Discrimination Policy and no reporting structure in place.

RECEIVED
IN DROP BOX

12 AUG 17 PM 1:09

GDSC COURTHOUSE
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO