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Superior Court of California
County of Los Angeles

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Sherri R. Carter, Executive Officer/Clerk
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JACQUELINE CARREON,
GENEVA CARTER,
RACQUEL CHANELO,
MELISSA GLAUDE,
KAREN LANG, and
ANGELA POWELL, individuals,
on behalf of themselves and all others
similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JACQUELINE CARREON, GENEVA CARTER,
RACQUEL CHANELO, MELISSA GLAUDE,
KAREN LANG and ANGELA POWELL,
individuals, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

CALIFORNIA DEPARTMENT OF
CORRECTIONS & REHABILITATION, a
division of the State of California; and DOES 1
through 100,

Defendants.

Case No.: **19STCV09935**

"CLASS ACTION"

**CLASS ACTION COMPLAINT FOR
DAMAGES, DECLARATORY, AND
INJUNCTIVE RELIEF**

1. Discrimination on the Basis of Sex, Gender and Pregnancy in Violation of the Fair Employment and Housing Act ("FEHA");
2. Failure to Provide Reasonable Accommodations in Violation of the FEHA;
3. Failure to Engage in the Good Faith Interactive Process in Violation of the FEHA;
4. Retaliation in Violation of the FEHA;
5. Denial of Pregnancy Disability Rights in Violation of the FEHA/Pregnancy Disability Leave Law; and
6. Failure to Prevent Discrimination and Retaliation from Occurring in Violation of the FEHA.

COME NOW Plaintiffs JACQUELINE CARREON, GENEVA CARTER, RACQUEL CHANELO, MELISSA GLAUDE, KAREN LANG and ANGELA POWELL ("Plaintiffs"), on behalf of themselves and all others similarly situated, and for causes of action under the California Fair Employment and Housing Act ("FEHA") against California Department of Corrections & Rehabilitation ("CDCR" or "Defendant") and DOES 1 through 100, alleges as follows:

I. INTRODUCTION

1. This lawsuit is brought by female correctional officers of child bearing age employed by CDCR at its correctional facilities in the State of California. Each of the Plaintiffs sought and were denied reasonable accommodation for and during their pregnancies.
2. CDCR has adopted a discriminatory and irrational policy which threatens the physical safety of both correctional officers and inmates under which CDCR refuses to provide reasonable accommodation or engage in an interactive process for purposes of affording such accommodation.
3. CDCR's policy has been the subject of numerous lawsuits, including a complaint filed by the California Department of Fair Employment and Housing which is currently pending in the San Luis Obispo County Superior Court and a lawsuit filed in Kern County Superior Court by a correctional officer whose baby died when she was injured responding to an inmate disturbance after being denied reasonable accommodation.

II. JURISDICTION AND VENUE

4. Personal jurisdiction is proper in this Court because Defendant operates correctional facilities throughout the State of California.
5. This Court has subject matter jurisdiction over this action under California Constitution, Article VI, Section 10, which confers in the Superior Court "original jurisdiction in all causes except those given by statute to other trial courts."
6. Venue is proper in this Court pursuant to Government Code § 12965, subd. (a) which, in relevant part, provides that "[a]n action may be brought in any county in the state in which the unlawful [employment] practice is alleged to have been committed, in the county in which the records

relevant to the practice are maintained and administered, or in the county in which the aggrieved person would have worked or would have had access to the public accommodation but for the alleged unlawful practice, but if the defendant is not found within any of these counties, an action may be brought within the county of the defendant's residence or principal office." The unlawful employment practice consists of the enforcement of an unlawful CDCR policy which was adopted by CDCR at its headquarters located in Sacramento, California, which is also where the relevant documents regarding the adoption and enforcement of the policy are located. Therefore, venue is proper in Sacramento County. Code of Civil Procedure § 401, subd. (1), in turn, provides "[w]henever it is provided by any law of this State that an action or proceeding against the State or a department, institution, board, commission, bureau, officer or other agency thereof shall or may be commenced in, tried in, or removed to the County of Sacramento, the same may be commenced and tried in any city or city and county of this State in which the Attorney General has an office." The Attorney General maintains an office in the City of Los Angeles. Therefore, venue is also proper in this Court.

III. THE PARTIES

7. Plaintiffs are now and, at all times mentioned in this complaint, were female Correctional Officers ("CO") employed in the State of California at a correctional facility operated by CDCR.
8. Defendant is a division of the State of California and is an "employer" within the meaning of FEHA, Government Code § 12940 *et seq.* Defendant is obligated to comply with the Pregnancy Disability Leave Law (Government Code § 12945 (hereinafter the "PDLL") which falls within the FEHA.
9. Each of the Plaintiffs requested but were denied reasonable accommodation during a pregnancy. When each of the Plaintiffs requested reasonable accommodation due to their pregnancies, they were advised by CDCR that they had the following options only:
 - A. Stay in her current position which would require her to: (i) waive any medical restrictions, (ii) confirm her ability to perform each and every essential job function for a CO, and (iii) assume liability for any injury caused by her decision to ignore any medical restrictions,

1 B. Accept a demotion resulting in reduced pay, loss of peace officer status, loss of
2 seniority, loss of benefits and loss of right to bid for shifts, or

3 C. Take a combination of paid and unpaid leave as an accommodation.

4 As discussed in detail below, the imposition of these three options are illegal under FEHA.

5 10. Plaintiff JACQUELINE CARREON ("Carreon") is 31 years old and first became employed by
6 CDCR in August 2015. She is currently employed as a Correctional Officer at Centinela State
7 Prison which is located in the City of Imperial, Imperial County, California. The facility houses
8 over 5,000 inmates of varying custody levels. In or about March 2016 and Jan 2017, Plaintiff
9 Carreon requested reasonable accommodation consisting of an assignment to a light duty position
10 that required minimal physical exertion and limited inmate contact due to a pregnancy. In
11 response, CDCR offered Plaintiff Carreon the options listed in paragraph 9 above. Plaintiff
12 Carreon again became pregnant in or about September 2017 and delivered a baby on June 8, 2018.
13 However, because of her experiences and CDCR's response to her prior pregnancies in 2016 and
14 2017, Plaintiff Lang was deterred from and did not request reasonable accommodation due to this
15 pregnancy.

16 11. Plaintiff GENEVA CARTER ("Carter") is 28 years old and first became employed by CDCR in
17 November 2010. She is currently employed as a Correctional Officer at Centinela State Prison.
18 In or about June 2017 and September 2018, Plaintiff Carter requested reasonable accommodation
19 consisting of an assignment to a light duty position that required minimal physical exertion and
20 limited inmate contact due to a pregnancy. In response, CDCR offered Plaintiff Carter the options
21 listed in paragraph 9 above.

22 12. Plaintiff RACQUEL CHANELO ("Chanelo") is 38 years old and first became employed by
23 CDCR in July 2002. She is currently employed in the rank of Correctional Sergeant at Kern Valley
24 State Prison, a male-only state Level IV Maximum Security institution, located in the City of
25 Delano, Kern County, California. In or about December, 2015 and October, 2018, Plaintiff
26 Chanelo requested reasonable accommodation consisting of an assignment to a light duty position
27 that required minimal physical exertion and limited inmate contact due to a pregnancy. In
28 response, CDCR offered Plaintiff Chanelo the options listed in paragraph 9 above.

1 13. Plaintiff MELISSA GLAUDE ("Glaude") is 36 years old and first became employed by the State
2 of California Department of Hospitals at the California Medical Facility (CMF) in March, 2012 as
3 a Medical Technical Assistant ("MTA"). CMF is a male-only state prison medical facility located
4 in the City of Vacaville, Solano County, California. As of 2017, CMF was transferred to the
5 management of CDCR and Plaintiff Glaude continued to be employed as an MTA. An MTA is
6 considered a "sworn" position with "peace officer" status and must be capable of performing all
7 duties of a Correctional Officer. In or about November, 2018, Plaintiff Glaude requested
8 reasonable accommodation consisting of assignment to a light duty position that required minimal
9 physical exertion and limited inmate contact due to her pregnancy. In response, CDCR offered
10 Plaintiff Glaude the options listed in paragraph 9 above.

11 14. Plaintiff KAREN LANG ("Lang") is 28 years old and first became employed by CDCR in 2016.
12 She is currently employed in the rank of Correctional Officer at Centinela State Prison. In or about
13 September of 2016, Plaintiff Lang requested reasonable accommodation consisting of assignment
14 to a light duty position that required minimal physical exertion and limited inmate contact. In
15 response, CDCR offered Plaintiff Lang the options listed in paragraph 9 above. Plaintiff Lang
16 again became pregnant in or about February 2018 and delivered a baby on August 2, 2018.
17 However, because of her experiences and CDCR's response in 2016, Plaintiff Lang was deterred
18 from and did not request reasonable accommodation due to this pregnancy.

19 15. Plaintiff ANGELA POWELL ("Powell") is 32 years old and first became employed by the State
20 of California Department of Hospitals at the CMF in in January 2014. She is currently employed
21 in the rank of Correctional Officer. As of 2017, CMF was transferred to the management of CDCR
22 and Plaintiff Powell continued to be employed by CDCR after the transfer. Plaintiff Powell
23 requested reasonable accommodation due to her pregnancies in June 2017, June 2018 and
24 September 2018. In response, CDCR offered Plaintiff Powell the options listed in paragraph 9
25 above.

26 16. Plaintiffs are ignorant of the true names and capacities of the Doe Defendants and therefore sue
27 them by fictitious names. Plaintiffs will amend this complaint to allege the true names and
28 capacities of DOES 1-100 when ascertained. Plaintiffs are informed and believe, and thereon

1 allege, that each of these fictitiously named Defendants designated as DOES 1-100 are responsible
2 in some manner for the events and happenings alleged herein and thereby legally caused injuries
3 and damage to Plaintiffs.

4 17. Plaintiffs are informed and believe, and thereon allege, that at all times herein mentioned, each of
5 Defendants herein was the agent and employee of each of the remaining Defendants and at all
6 times was acting within the purpose and scope of such agency and employment, and with the
7 permission and consent of her/her/its co-Defendants with knowledge, authorization, permission,
8 consent and/or subsequent ratification and approval of each co-Defendant.

9 18. Plaintiffs are informed and believe, and thereon allege, that at all times herein mentioned, each
10 Defendant was acting in a supervisory or managerial capacity and in the course and scope of such
11 agency and/or employment with the permission and consent of said co-Defendants and acted with
12 the power to bind Defendants and each of them to the acts of said individuals, said acts having
13 thereafter been ratified by Defendants, and each of them.

14 **IV. FACTS COMMON TO ALL CAUSES OF ACTION**

15 **A. Under Its Pre-2015 Policy, CDCR Provided Light Duty Positions To** 16 **Pregnant Correctional Officers**

17 19. Prior to 2015, CDCR maintained a rational, reasonable, and legally compliant Pregnancy
18 Accommodation ("PA") Policy set forth in section 31040.10 of CDCR Operations Manual
19 ("Manual"). The PA Policy had three (3) significant terms that provided reasonable
20 accommodations to COs with pregnancy-related limitations. First, the PA Policy placed no
21 limitation on how long a pregnant CO could work, and she theoretically could work, until the day
22 of delivery. Second, the PA Policy allowed a pregnant CO to continue to work in her current
23 position, so long as safety and security was not compromised. Third, a CO could remain in her
24 current job classification while working in an alternate light duty position designated for pregnant
25 COs.

26 20. In other words, under the PA Policy, a pregnant CO would retain her pay and benefits even though
27 she was assigned to a different or lower paid job and classification. Under the now abolished PA
28

1 Policy and consistent with the policy of all major law enforcement agencies including the Federal
2 Bureau of Prisons, most CDCR facilities maintained "light duty" positions for pregnant COs
3 during periods of pregnancy-related disabilities. However, in 2015, CDCR eliminated light duty
4 positions under a new policy.

5
6 **B. Effective June 15, 2018, Defendant Adopted A Rigid, Illogical And**
7 **Unlawful Policy That Eliminated Light Duty Positions For Pregnant Correctional**
8 **Officers**

9 21. In 2015, CDCR revised the Manual to eliminate the PA Policy. In its place, CDCR implemented
10 a radical, internally inconsistent, and clearly unlawful policy that eliminated designated light duty
11 positions. As discussed in greater detail below, the new provisions of the Manual gave pregnant
12 COs the following options:

- 13 A. Stay in her current position which would require her to: (a) waive any medical
14 restrictions, (b) confirm her ability to perform each and every essential job
15 function for a CO, and (c) assume liability for any injury caused by her decision
16 to ignore any medical restrictions;
17 B. Accept a demotion resulting in reduced pay, loss of peace officer status, loss of
18 seniority, loss of benefits and loss of right to bid for shifts; or
19 C. Take a combination of paid and unpaid leave as an accommodation.

20 22. The new policy was challenged by the California Department of Fair Employment and Housing
21 ("DFEH") in *Department of Fair Employment and Housing v. California Department Of*
22 *Corrections and Rehabilitation*, San Luis Obispo Superior Court Case No. 16CV-0522. The case
23 was settled as to the Real Party in Interest Amanda Van Fleet and is pending as to Plaintiff DFEH,
24 which is seeking affirmative relief to invalidate the relevant provisions of the Manual concerning
25 accommodation for pregnancy related disabilities.

26 23. CDCR's PA Policy was also challenged by a female correctional officer in *Coogle v. California*
27 *Department Of Corrections and Rehabilitation*, Kern County Superior Court Case No. CV-18-
28 100866, because after being denied reasonable accommodation, the officer was injured when
responding to an inmate disturbance and as a result her full-term baby was still born and the officer

1 was placed on life support. The Kern County Superior Court issued a preliminary injunction
2 whereby CDCR was enjoined from offering or imposing a demotion, a reduction in pay or benefits,
3 or forced unpaid leave in response to a request for reasonable accommodation due to a pregnancy.
4 The order was modified when the plaintiff lost her pregnancy due to a miscarriage, subject to her
5 right to seek the injunction if she became pregnant again. The legal issues in these cases are
6 identical to those in this case.

7
8 **1. Defendant Maintains A Single Set Of "Essential Functions"**
9 **Regardless Of The Correctional Officers' Actual Assignment Or Duties**

10 24. CDCR maintains a singular set of Essential Functions ("EF") for its Correctional Officers. As
11 might be expected, the EFs are physically rigorous and include:

- 12 • Must be able to work overtime. Overtime is mandatory and could be 8 hours at one
13 time, and on very rare occasions up to 16 hours in situations such as a riot.
- 14 • Must be able to wear personal protective gear (i.e. stab proof vest); and clothing and
15 breathing apparatus to prevent injuries and exposures to blood/air borne pathogens.
- 16 • Must be able to swing baton with force to strike an inmate.
- 17 • Disarm, subdue and apply restraints to an inmate.
- 18 • Defend self against an inmate armed with a weapon.
- 19 • Inspect inmates for contraband and conduct body searches.
- 20 • Run occasionally and run in an all-out effort while responding to alarms and serious
21 incidents in distances varying from a few yards to 400 yards. Running may take place
22 over varying surfaces including uneven grass, dirt areas, pavement, cement, etc.
23 Running can include stairs or several flights of stairs maneuvering up or down.
- 24 • Sit and stand occasionally to continuously and wear equipment belt weighing 15
25 pounds.

26 25. CDCR requires that its COs must always be able to discharge each EF in order to remain employed
27 as a CO. In other words, according to CDCR, each of its correctional officers have the same
28 essential functions required of them regardless of their particular assignment or duties. This means

1 that whether the CO is assigned to a super-maximum prison, a CDCR hospital, regularly tasked
2 with driving a bus, or assigned to sedentary duties such as sitting or standing in a sally port (a
3 secure, controlled entryway in a prison), or watch tower, each CO must always be able to fulfill
4 each EF.

5 26. CDCR applies this rule unbendingly. For example, if a CO provided a medical certification
6 restricting any running activity to a maximum of 399 yards under any circumstance, the individual
7 would be disqualified from working as a correctional officer for CDCR based on its 400-yard rule.
8 Similarly, CDCR does not consider the frequency with which an individual CO is required to
9 engage in any of the above duties.

10 27. The practical effect of CDCR's strict EF requirements and how they are applied means that women
11 in the latter stages of a pregnancy are not qualified to serve as COs and must either (a) accept a
12 demotion (with a loss of pay and benefits), (b) take a leave of absence, or as discussed below (c)
13 ignore medical restrictions and continue to perform all duties required of a CO.

14
15 **2. CDCR Denies Established 60-Day Limited Duty Assignments To
Pregnant COs**

16 28. Naturally, COs coping with work and off-duty injuries, along with pregnant COs, are incapable of
17 performing the above described EFs for varying time periods. Therefore, CDCR makes an
18 exception and will waive the EF requirements upon a medical certification but only up to a
19 maximum of 60 days. However, CDCR refuses to provide this 60-day waiver to pregnant women,
20 while affording the waiver to other forms of limited disabilities.

21
22 **3. Prior To 2015, CDCR Waived The Essential Functions
Requirement For Pregnant Correctional Officers**

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24 29. Prior to 2015, under its former policy, CDCR expressly waived the EF requirement for pregnant
25 COs. Rather than extending the waiver to both pregnancy and nonpregnancy related medical
26 conditions, CDCR has adopted a curious procedure for providing accommodations to temporary
27 disability situations but refusing to provide the same accommodations in cases of pregnancy.

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4. Effective June 15, 2018, CDCR Adopted Its Inflexible And Illegal Policy

30. CDCR's current policy has several components. First, it retained the 60-day light duty assignments (but not available in pregnancies), if the individual was able to return without any medical restrictions at the end of the 60 day period. Second, in order for CDCR to consider a pregnant CO for an alternate position, she is first required to "override" or "trump" any medical restrictions imposed by her physicians. Specifically, the CO must sign a statement indicating her agreement with the following statement: **"I do not agree with the reported severity of the medical restrictions that are noted in the medical note signed by [my physician]."** As explained below, it matters not to CDCR that a CO is not a medical expert and CDCR simply accepts the CO's waiver of medical restrictions. Third, if the CO refuses to "waive" the medical restrictions, she has the following options: (1) she can "medically demote" which means that during pregnancy the CO could move into a lower paying position with reduced benefits, or (2) utilize accrued and/or unpaid leave and then return to her duties as a CO when released by her physician.

31. This application of the new policy places a pregnant CO in the untenable position of contradicting her physician's medical restrictions to be considered for a light duty position. In other words, a pregnant CO must choose between her own safety and the safety of her unborn child and her job. A male CO is not required to make this choice to obtain a 60-day waiver of the EFs. Furthermore, no responsible physician would permit nor would any caring mother ever "waive" reasonable limitations such as no running, wearing constraining safety equipment or swinging a baton with sufficient force to subdue an inmate in the latter stages of a pregnancy. Therefore, the practical impact of CDCR's current policy is to deny each pregnant CO reasonable accommodation.

C. CDCR's Current Policy Makes It Impossible To Engage In The "Good Faith Interactive Process"

32. CDCR has an affirmative legal duty, pursuant to the FEHA, to engage in a "good faith interactive process" to provide reasonable accommodations for pregnancy related disability. See, e.g., Government Code §§ 12940(m)(1) & (n), Government Code § 12945(a)(3). A "Reasonable

Accommodation" under the FEHA regulations is defined as:

"Reasonable accommodation" of an employee affected by pregnancy is any change in the work environment or in the way a job is customarily done that is effective in enabling an employee to perform the essential functions of a job. Reasonable accommodation may include, but is not limited to: (1) modifying work practices or policies; (2) modifying work duties; (3) modifying work schedules to permit earlier or later hours, or to permit more frequent breaks (e.g., to use the restroom); (4) providing furniture (e.g., stools or chairs) or acquiring or modifying equipment or devices; or (5) providing a reasonable amount of break time and use of a room or other location in close proximity to the employee's work area to express breast milk in private as set forth in the Labor Code.

Cal. Code Regs. § 11035(s). The contemporaneous construction of a legislative enactment by the administrative agency charged with its enforcement (such as DFEH), is entitled to great weight. *Amador Valley Joint Union High Sch. Dist. v. State Bd. of Equalization*, 22 Cal.3d 208, 245 (1978).

33. FEHA requires an employer "to engage in a timely, good faith, interactive process with the employee or applicant to determine effective reasonable accommodations, if any, in response to a request for reasonable accommodation by an employee or applicant with a known physical or mental disability or known medical condition." Government Code § 12940(n). The interactive process requires communication and good-faith exploration of possible accommodations between employers and individual employees with the goal of identifying an accommodation that allows the employee to perform the job effectively. *Williams v. Genentech, Inc.*, 139 Cal.App.4th 357, 381-82 (2006).

34. It is impossible for CDCR to engage in the individualized approach under the current policy because CDCR has one list of "essential job functions" for COs, throughout and for every post and every facility it operates throughout the State of California. In other words, what CDCR considers to be "essential job functions" is grossly overstated as it includes functions that may not be performed at all by the pregnant woman requesting accommodation on the advice of her medical care provider, but instead includes duties performed by another individual somewhere else in her facility or somewhere else in the State of California.

35. Similarly, CDCR's policy precludes CDCR from engaging in a good faith interactive process because it requires pregnant COs to waive reasonable medical restrictions. Because no competent physician would permit and no responsible mother would waive medical restrictions that apply to a pregnancy, the interactive process is stopped in its tracks by CDCR's policy.

36. This one-size-fits-all approach to the determination of the EFs of the various CO posts and the requirement to waive medical restrictions, throughout the state, makes an individualized assessment of reasonable accommodation impossible. Therefore, the process utilized by CDCR violates the fact-specific inquiry that the FEHA requires of employers to ensure that workers with medical restrictions can remain gainfully employed. See, e.g. 2 Cal. Code Regs. § 11040(a)(2)(A) ("Whether an accommodation is reasonable is a factual determination to be made on a case-by-case basis, taking into consideration such factors, including but not limited to, the employee's medical needs, the duration of the needed accommodation, the employer's legally permissible past and current practices, and other such factors, under the totality of the circumstances.").

D. CDCR's Current Policy Violates The "No Restrictions" Rule

37. CDCR's policy of requiring all COs requesting accommodation, regardless of institution or post assignment, to be able to perform the responsibilities of every other post and every other assignment is illegal under the "No Restriction" or "100% Healed" rules. As the regulations implementing FEHA provide:

An employer or other covered entity shall assess individually an employee's ability to perform the essential functions of the employee's job either with or without reasonable accommodation.

In the absence of an individualized assessment, an employer or other covered entity shall not impose a "100 percent healed" or "fully healthy" policy before the employee can return to work after illness or injury.

2 Cal. Code Regs. § 11068(i). CDCR's policy is illegal because in effect it mandates that a CO can have no restrictions limiting her ability to perform each and every essential job function (which is overbroadly defined in the first place).

38. In addition, CDCR's policy is also against the public interest and endangers the safety of COs and

1 inmates. The policy requiring COs to be ready, willing, and able to perform what it overbroadly
2 classifies as the essential functions of any other CO encourages COs throughout the State of
3 California to hide medical restrictions and not request accommodation. Therefore, the effect of
4 the policy is to interfere with COs' rights under the FEHA. See Government Code § 12945(a)(4).

5
6 **E. CDCR 60-Day Waiver For Essential Job Functions Discriminates Against Pregnant Women**

7 39. While CDCR has a legitimate interest in ensuring that male and female COs are treated equally, it
8 is discriminatory to impose the same physical restrictions and approach the interactive process as
9 if there is no difference between men and women.

10 40. The 60-day waiver clearly violates the regulations implementing FEHA. Specifically, FEHA
11 mandates:

12 It is unlawful for an employer who has a policy, practice, or collective bargaining agreement
13 requiring or authorizing the transfer of temporarily disabled employees to less strenuous or
14 hazardous positions or duties for the duration of the disability, including disabilities or
15 conditions resulting from on-the-job injuries, to fail to apply the policy, practice or collective
16 bargaining agreement to transfer an employee who is disabled by pregnancy and who so
17 requests.

18 2 Cal. Code Regs. § 11041(a)(1).

19 41. The 60-day waiver is unlawful for two reasons. First, the waiver is not extended to pregnant COs
20 as CDCR considers it a "manipulation" of the system. Second, there is no logic behind an arbitrary
21 60-day waiver, as opposed to a longer waiver period. Consistent with other large law enforcement
22 agencies, CDCR can and should treat a pregnancy disability in the same manner as any other
23 temporary disability.

24 42. A reasonable accommodation for any disability includes a waiver of the essential job functions for
25 varying periods of times based on the particular facts in tandem with modified job duties and
26 alternate positions. The pre-2015 PA Policy certainly provided such accommodations. The new
27 policy clearly does not and targets female COs in a discriminatory manner.
28

F. CDCR's Current Policy Violates Analogous Federal Law

43. As discussed above, the current CDCR policy violates FEHA and regulations implementing FEHA. In addition, the United States Supreme Court has held that an employer may be liable under the federal Pregnancy Disability Act where it denies a pregnant worker a light-duty assignment accommodation but does accommodate other employees similarly situated in their ability or inability to work. *See Young v. United Parcel Service, Inc. ("Young")*, __ U.S. __, 135 S. Ct. 1338, 1354, 191 L. Ed. 2d 279 (2015).

G. CDCR's Policy Violates Public Policy And Places It In Isolation To Other Law Enforcement Agencies

44. There is no question that CDCR's policy is archaic and backwards and isolates CDCR from prominent law enforcement agencies throughout the country. For example, the one page, 300 word "ASSIGNMENT OF PREGNANT EMPLOYEES" policy of the Los Angeles Police Department ("LAPD") is a model of clarity and simplicity. Upon a medical certification, a pregnant LAPD officer will be offered one of the following options:

- Immediate assignment to sedentary duties,
- Continued assignment in present duties until the employee's condition necessitates assignment to sedentary duties, or
- Immediate assignment to off duty status.

A pregnant LAPD employee, at her option, may also elect to take paid and/or unpaid leave. Further, when the wearing of a uniform is no longer practical, the LAPD officer is reassigned to non uniformed duty and permitted to dress in appropriate civilian attire.

45. The LAPD policy is consistent with the City of Portland Police Bureau which, without any rigid time restrictions, affords its pregnant officers modified duty assignments upon request.

46. The Women in Federal Law Enforcement ("WIFLE") Foundation provides Pregnancy Guidelines for Federal Law Enforcement which identifies "Maternity Duty" as a form of reasonable accommodation for pregnant law enforcement officers. Under WIFLE's Pregnancy Guidelines,

pregnant officials are afforded various "light duty" assignments, including:

1. Response to non-hazardous calls for service
2. Writing incident reports
3. Operating communication devices and systems
4. Interviewing persons
5. Clerical investigative functions
6. Dispatch functions
7. Intelligence Unit
8. Vehicle Control Officer
9. Recruitment Officer
10. Electronic crimes
11. Public Information Office
12. Academy training staff
13. Human resources duties
14. Supervision over field work not required to engage in hazardous duties
15. Clerical and support functions and duties

47. As the National Center on Women and Policing has concluded, light duty for pregnant law enforcement officers is of widespread public policy concern:

One of the most critical components of a pregnancy policy is inclusion of a light duty policy. Many pregnant women officers in law enforcement positions will want the option of moving to a light duty assignment at some point in their pregnancy. Without the option of a light duty assignment, many women may have to take unpaid leave, creating financial and emotional hardships that can be avoided. Light duty assignments may include a transfer to different duties or a modification in current duties. If the department provides light duty assignments for other employees who have non-service related temporary disabilities, then they are required by law to provide the same assignments for pregnant employees. However, a pregnant officer should not be forced into a light duty assignment against her will if she is physically able to safely perform her current assignment. If the officer's ability to perform her assignment is at issue,

1 consultation with a physician may be necessary. The best light duty policies are flexible; have
2 no time limit on how long a pregnant woman can be assigned to light duty; leave the decision
3 as to when to commence a light duty assignment with the pregnant officer and her physician;
4 and stipulate that officers on light duty will continue to receive normal promotion and pay
5 increases while in that status, and that retirement benefits will not be affected.

6
7 **V. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

8 48. On March 19, 2019, Plaintiffs filed a complaint with the Department of Fair Employment and
9 Housing ("DFEH"). That same day Plaintiffs received a Right to Sue Notice pursuant to
10 Government Code Section 12965, subd. (b). A true and correct copy of the DFEH Right to Sue
11 notices are attached hereto as Exhibit A. Therefore, Plaintiffs have exhausted their pre-filing state
12 law remedies by filing and serving a complaint with the DFEH and receiving a Notice of Right to
13 Sue for their claims.

14
15 **VI. CLASS ACTION ALLEGATIONS**

16 49. This class action is properly brought under the provisions of California Code of Civil Procedure §
17 382, and, to the extent applicable, the procedural provisions of Rule 23 of the Federal Rules of Civil
18 Procedure, which have been adopted by the California Supreme Court for use by the trial courts of
19 this State. Plaintiffs bring this class action on behalf of themselves and all others similarly situated,
20 with Plaintiffs proceeding as the representative members of the following class defined as: All
21 current or former female employees of child bearing age who worked as correctional officers and
22 either sought or were deterred from seeking reasonable accommodation due to a pregnancy for a
23 one year period prior to the date this Complaint was filed ("Plaintiff Class").

24 50. To the extent equitable tolling applies to toll claims by the above-referenced Class against
25 Defendant, the class period should be adjusted accordingly.

26 51. This action has been brought and may properly be maintained as a class action, under California
27 Code of Civil Procedure § 382 because a well-defined community of interest in the litigation exists
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1 and because the proposed class is easily ascertainable, and for the other reasons explained in this
2 Class Action Complaint.

3 **52. Numerosity:** The persons who comprise the Plaintiff Class are so numerous that joinder of all such
4 persons would be unfeasible and impracticable. The membership of Plaintiff Class is unknown to
5 Plaintiffs at this time; however, on information and belief, the Plaintiff Class alone is at least one
6 thousand individuals, whose identities are readily ascertainable by inspection of CDCR's payroll
7 records.

8 **53. Commonality:** Common questions of fact or law arising from CDCR's conduct exist, as described
9 in this Complaint, as to all members of the Class, which predominate over any questions solely
10 affecting individual members of the proposed class, including but not limited to:

- 11 • Whether CDCR's PA Policy discriminates against pregnant correctional officers?
- 12 • Whether CDCR's PA Policy constitutes a failure to accommodate limited periods
- 13 of disability due to a pregnancy?
- 14 • Whether CDCR's PA Policy constitutes a failure to engage in the interactive process
- 15 to accommodate limited periods of disability due to a pregnancy?
- 16 • Whether CDCR's conduct as alleged herein violate the FEHA and/or PDL?

17 Defendant's defenses, to the extent that any such defense is applied, are applicable generally to the
18 Plaintiff Class and are not distinguishable to any degree relevant or necessary to defeat predominance
19 in this case.

20 **54. Adequacy:** Plaintiffs, on behalf of all others similarly situated, will fairly and adequately protect
21 the interests of all members of the Class in connection with which they have retained competent
22 attorneys. Plaintiffs are able to fairly and adequately protect the interests of all members of the
23 Plaintiff Class because it is in Plaintiffs' best interests to prosecute the claims alleged herein to
24 obtain full compensation due to them. Plaintiffs do not have a conflict with the Class nor are their
25 interests antagonistic towards the Class. Plaintiffs have retained counsel who are competent and
26 experienced in representing employees in such litigation

27 **55. Superiority:** Under the facts and circumstances set forth above, class action proceedings are
28 superior to any other methods available for both fair and efficient adjudication of the controversy.

1 A class action is particularly superior because the rights of each member of the Class, inasmuch as
2 joinder of individual members of the Class is not practical and, if the same were practical, said
3 members of the Class could not individually afford the litigation, such that individual litigation
4 would be inappropriately burdensome, not only to said Class members, but also to the courts of the
5 State of California.

6 56. Litigation of these claims in one forum is efficient as it involves a single decision or set of decisions
7 that affects the rights of thousands of current, former and prospective CDCR employees. In
8 addition, class certification is superior because it will obviate the need for unduly duplicative
9 litigation that might result in inconsistent judgments concerning CDCR's practices.

10 57. To process individual cases would increase both the expenses and the delay not only to members
11 of the Class, but also to CDCR and the Court. In contrast, a class action of this matter will avoid
12 case management difficulties and provide multiple benefits to the litigating parties, including
13 efficiency, economy of scale, unitary adjudication with consistent results and equal protection of
14 the rights of each member of the Class, all by way of the comprehensive and efficient supervision
15 of the litigation by a single court.

16 58. This case is eminently manageable as a class. Defendant's computerized records, including
17 meticulous payroll and personnel data, provide an accurate and efficient means to obtain
18 information on the effect and administration of the PA Policy en masse, meaning class treatment
19 would significantly reduce the discovery costs to all parties.

20 59. In particular, CDCR has taken unfair advantage of the short human gestation period to avoid
21 liability for violation of the rights of the Plaintiff Class. A female correctional officer has a limited
22 amount of time to seek reasonable accommodation. CDCR has taken advantage of this basic
23 biological fact by consistently denying reasonable accommodation with the expectation that once
24 the pregnancy is concluded either by a miscarriage or live birth, the female officers will lose
25 interest, be unable to find competent counsel willing to represent them, or simply claim (as it does
26 consistently throughout litigation seeking injunctive relief) that there is no threat of irreparable
27 harm. The unlikelihood that many injured class members will discover, let alone endeavor to
28

vindicate their claims, demonstrates that a class action is a superior method of resolving those claims.

60. There is a community of interest in obtaining appropriate legal and equitable relief for the statutory violations and other improprieties, and in obtaining adequate relief for injuries which CDCR's actions have inflicted upon the Class.

61. Notice of the pendency and any result or resolution of the litigation can be provided to members of Plaintiff Class by the usual forms of publication, sending out to members a notice at their current addresses, establishing a website where members can choose to opt-out, or such other methods of notice as deemed appropriate by the Court.

62. Without class certification, the prosecution of separate actions by individual members of the Class would create a risk of: (1) inconsistent or varying adjudications with respect to individual members of the Class that would establish incompatible standards of conduct for CDCR; or (2) adjudications with respect to the individual members of the Class that would, as a practical matter, create disparities as to the interests of the other members not parties to the adjudication, or would substantially impair or impede their ability to protect their interest.

FIRST CAUSE OF ACTION

DISCRIMINATION IN VIOLATION OF FEHA, GOVT. CODE §§ 12940 *et seq.*

63. Plaintiffs hereby re-allege and incorporate by reference all previous paragraphs, inclusive, of this Complaint as though set forth in full.

64. Plaintiffs allege discrimination in violation of the FEHA, as codified in Government Code §§ 12940 *et seq.* against Defendant. Government Code § 12940(a) provides that it is an unlawful employment practice for an employer to "discriminate against [a] person in compensation or in terms, conditions, or privileges of employment."

65. Government Code § 12940(n) also provides that it is an unlawful employment practice "for an employer or other entity covered by [the FEHA] to fail to engage in a timely, good faith, interactive process with the employee or applicant to determine effective reasonable accommodations, if any, in response to a request for reasonable accommodation by an employee or applicant with a known physical or mental disability or known medical condition."

66. As a proximate result of Defendant's conduct, Plaintiffs have suffered special damages in the form of lost earnings, benefits and/or out of pocket expenses in an amount shown according to proof at the time of trial. As a further direct and proximate result of Defendant's conduct, Plaintiffs will suffer additional special damages in the form of lost future earnings, benefits and/or other prospective damages in an amount shown according to proof at the time of trial.

67. By reason of the conduct of Defendant herein, Plaintiffs have retained attorneys to prosecute their claims under the FEHA. Plaintiffs are therefore entitled to recover reasonable attorneys' fees and costs pursuant to Government Code § 12965(b), in addition to other damages as provided by law and as alleged herein.

SECOND CAUSE OF ACTION

FAILURE TO ACCOMMODATE IN VIOLATION OF FEHA, GOVT. CODE § 12940(m)

68. Plaintiffs hereby re-allege and incorporate by reference all previous paragraphs, inclusive, of this Complaint as though set forth in full.

69. California Government Code § 12940(m) makes it unlawful "[f]or an employer or other entity... to fail to make reasonable accommodation for the known physical or mental disability of an applicant or employee."

70. At all times relevant to this lawsuit, Plaintiffs suffered from a physical disability and medical condition that required ongoing treatment and limited their major life activities. Plaintiffs' condition falls under the definition of "disability" under FEHA.

71. Defendant was fully aware of Plaintiffs' physical disabilities and medical conditions.

72. At all relevant times during their employment, Plaintiffs were otherwise qualified and able to do their job. Plaintiffs were able to perform the essential job duties required with reasonable restrictions and/or accommodations for their physical disability and medical condition. Defendant failed to reasonably accommodate Plaintiffs.

73. As a proximate result of Defendant's conduct, Plaintiffs have suffered special damages in the form of lost earnings, benefits and/or out of pocket expenses. As a further direct and proximate result of Defendant's conduct, Plaintiffs will suffer additional special damages in the form of lost future earnings, benefits and/or other prospective damages.

1 74. By reason of the conduct of Defendant herein, Plaintiffs have retained attorneys to prosecute their
2 claims under the FEHA. Plaintiffs are therefore entitled to recover reasonable attorneys' fees and
3 costs pursuant to Government Code § 12965(b), in addition to other damages as provided by law
4 and as alleged herein.

5 **THIRD CAUSE OF ACTION**

6 **FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS**

7 **IN VIOLATION OF FEHA, GOVT. CODE § 12940(n)**

8 75. Plaintiffs hereby re-allege and incorporate by reference all previous paragraphs, inclusive, of this
9 Complaint as though set forth in full.

10 76. California Government Code § 12940(n) makes it unlawful "[f]or an employer or other entity
11 covered by this part to fail to engage in a timely, good faith interactive process with the employee
12 or applicant to determine effective reasonable accommodations, if any, in response to a request for
13 reasonable accommodation by an employee or applicant with a known physical or mental disability
14 or known medical condition."

15 77. At all times relevant to this lawsuit, Plaintiffs suffered from a physical disability and medical
16 condition that requires ongoing treatment and limited major life activities. Plaintiffs' condition
17 falls under the definition of "disability" under FEHA. Defendant was aware of Plaintiffs'
18 disabilities and medical conditions.

19 78. Plaintiffs were able to perform their essential job duties with reasonable accommodation for their
20 physical disability and medical condition. At all times during their employment, Plaintiffs were
21 otherwise qualified to do their job. Plaintiffs were willing to participate in the interactive process
22 to determine reasonable accommodations. Defendant failed to engage in a timely good-faith
23 interactive process with Plaintiffs to determine an effective and reasonable accommodation.

24 79. As a proximate result of Defendant's conduct, Plaintiffs have suffered special damages in the form
25 of lost earnings, benefits and/or out of pocket expenses. As a further direct and proximate result of
26 Defendant's conduct, Plaintiffs will suffer additional special damages in the form of lost future
27 earnings, benefits and/or other prospective damages.

28

1 80. By reason of the conduct of Defendant herein, Plaintiffs have retained attorneys to prosecute their
2 claims under the FEHA. Plaintiffs are therefore entitled to recover reasonable attorneys' fees and
3 costs pursuant to Government Code § 12965(b), in addition to other damages as provided by law
4 and as alleged herein.

5 **FOURTH CAUSE OF ACTION**

6 **RETALIATION IN VIOLATION OF FEHA/PDLL**

7 81. Plaintiffs hereby re-allege and incorporate by reference all previous paragraphs, inclusive, of this
8 Complaint as though set forth in full.

9 82. The FEHA and PDLL make it unlawful for an employer to retaliate against an employee for
10 engaging in any activity protected under those chapters. Plaintiffs engaged in protected activities,
11 including, but not limited to: 1) complaining of discrimination; and 2) requesting reasonable
12 accommodations.

13 83. Defendant materially and adversely affected the terms and conditions of Plaintiffs' employment as
14 a result of them engaging in the foregoing protected activities.

15 84. Defendant's unlawful and retaliatory treatment of Plaintiffs have caused economic and
16 noneconomic harm in an amount to be proven at trial, but which are in excess of the minimum
17 jurisdiction of this court. Plaintiffs' damages include, but are not limited to, loss of earnings and
18 benefits, humiliation, embarrassment, severe mental and emotional distress and discomfort.

19 **FIFTH CAUSE OF ACTION**

20 **DENIAL OF PDLL RIGHTS**

21 85. Plaintiffs hereby re-allege and incorporate by reference all previous paragraphs, inclusive, of this
22 Complaint as though set forth in full.

23 86. Plaintiffs were in need of and requested reasonable accommodations for their pregnancy.

24 87. Defendant did not provide reasonable accommodations as required by the PDLL, or permit
25 Plaintiffs to participate in its policies permitting for light duty and/or waiver of essential job
26 functions.

27 88. Defendant's denial of Plaintiffs' rights under the PDLL has caused them economic and
28 noneconomic harm in an amount to be proven at trial, but which are in excess of the minimum

jurisdiction of this court. Plaintiffs' damages include, but are not limited to, loss of earnings and benefits, humiliation, embarrassment, mental and emotional distress and discomfort.

SIXTH CAUSE OF ACTION

FAILURE TO PREVENT DISCRIMINATION AND RETALIATION

IN VIOLATION OF FEHA

89. Plaintiffs hereby re-allege and incorporate by reference all previous paragraphs, inclusive, of this Complaint as though set forth in full.

90. Plaintiffs were subjected to discrimination and retaliation on the basis of their gender, pregnancy, and physical disability, and request for reasonable accommodation pursuant to the PDLL and FEHA.

91. Defendant failed to take reasonable steps to prevent the discrimination and retaliation from occurring.

92. Defendant's failure to prevent discrimination and retaliation from occurring caused Plaintiffs economic and noneconomic harm in an amount to be proven at trial, but which are in excess of the minimum jurisdiction of this court. Plaintiffs' damages include, but are not limited to, loss of earnings and benefits, humiliation, embarrassment, mental and emotional distress and discomfort.

DECLARATORY RELIEF ALLEGATIONS

93. There exists a substantial controversy of sufficient immediacy and reality to warrant the issuance of a declaratory judgment. Specifically, Plaintiffs claim that Defendant's PA Policy is unlawful in both content and application. Defendant disputes Plaintiffs' contention and maintains that its PA Policy is lawful.

94. A judicial declaration pursuant to Code of Civil Procedure § 1060 is necessary and appropriate at this time so that Plaintiffs' rights under the PA Policy may be determined with certainty. Accordingly, Plaintiffs request a judicial declaration that: a) the PA Policy is illegal and unenforceable, and b) members of the Plaintiff Class are entitled to a restoration of any employee salary and benefits which they lost as a direct application of the PA Policy including, without limitation, seniority, right to bid for shifts, accrued leave, and/or leave that would have been earned had CDCR provided reasonable accommodation.

1
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3 **INJUNCTIVE RELIEF ALLEGATIONS**

4 95. Plaintiffs are presently and continuously injured by Defendant's enforcement of its PA Policy as it
5 violates Plaintiffs' rights under FEHA. If not enjoined by this Court, Defendants will continue to
6 enforce the PA Policy in derogation of Plaintiffs' rights. Plaintiffs have no plain, speedy, and
7 adequate remedy at law. Damages are indeterminate or unascertainable and, in any event, would
8 not fully redress any harm suffered by Plaintiffs because they are unable to enjoy the rights and
9 protections set forth in FEHA during the limitation period of a pregnancy.

10 **PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiffs pray as follows:

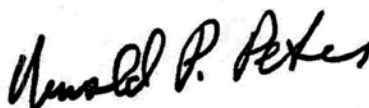
- 12 1. For general, special, actual, compensatory and/or nominal damages, as against Defendant,
13 in an amount to be determined at trial;
- 14 2. For a temporary restraining order, preliminary injunction and permanent injunction
15 prohibiting Defendant CDCR from further implementing its illegal accommodation policy;
16 and requiring it to develop and implement policies of accommodation that comply with the
17 FEHA;
- 18 3. For ongoing oversight, as determined by the Court, of CDCR's accommodation policies
19 and practices;
- 20 4. For a Declaration that Defendant CDCR: (a) discriminated against Plaintiffs; (b) failed to
21 provide reasonable accommodations to Plaintiffs; (c) failed to engage in the good faith
22 interactive process with Plaintiffs; (d) retaliated against Plaintiffs; (e) denied Plaintiffs
23 rights under the FEHA and PDLL; and (f) failed to take adequate measures to prevent
24 discrimination and retaliation from occurring;
- 25 5. For costs and expenses of this litigation, including expert fees and costs;
- 26 6. For reasonable attorneys' fees;
- 27 7. For pre and post-judgment interest on all damages and other relief awarded herein; and,
- 28 8. For all such other relief as this Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demands trial by jury in this action of all claims asserted against as permitted
by law.

Dated: March 24, 2019

PETER LAW GROUP



By: _____

Arnold P. Peter
JACQUELINE CARREON,
GENEVA CARTER, RACQUEL
CHANELO, MELISSA GLAUDE,
KAREN LANG, and ANGELA POWELL,
individuals, on behalf of themselves and
all others similarly situated

PETER LAW GROUP
1230 ROSECRANS AVENUE, SUITE 210
MANHATTAN BEACH, CALIFORNIA 90266

6102/52/80

03/25/2019

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EXHIBIT A



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfefh.ca.gov

March 19, 2019

Eyal Farahan
1230 Rosecrans Avenue Suite 210
Manhattan Beach, California 90266

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 201903-05502919
Right to Sue: Carreon / California Department of Corrections and Rehabilitation

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) 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, DFEH 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 DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 19, 2019

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

DFEH Matter Number: 201903-05502919

Right to Sue: Carreon / California Department of Corrections and Rehabilitation

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) 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. This case is not being investigated by DFEH and is being closed immediately. 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 DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

Jacqueline Carreon
2470 W. Hamilton Ave.
El Centro, California 92243

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201903-05502919
Right to Sue: Carreon / California Department of Corrections and Rehabilitation

Dear Jacqueline Carreon,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 19, 2019 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 contact 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.

Sincerely,

Department of Fair Employment and Housing

03/25/2019

1 **COMPLAINT OF EMPLOYMENT DISCRIMINATION**
2 **BEFORE THE STATE OF CALIFORNIA**
3 **DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**
4 **Under the California Fair Employment and Housing Act**
 (Gov. Code, § 12900 et seq.)

5 **In the Matter of the Complaint of**

6 Jacqueline Carreon

DFEH No. 201903-05502919

7 Complainant,

8 vs.

9 California Department of Corrections and
10 Rehabilitation
11 P.O. Box 942883
12 Sacramento, California 94283

13 Respondents

14 1. Respondent **California Department of Corrections and Rehabilitation** is an
15 **employer** subject to suit under the California Fair Employment and Housing Act
16 (FEHA) (Gov. Code, § 12900 et seq.).

17 2. Complainant **Jacqueline Carreon**, resides in the City of **El Centro** State of
18 **California**.

19 3. Complainant alleges that on or about **March 18, 2019**, respondent took the
20 following adverse actions:

21 **Complainant was discriminated against** because of complainant's sex/gender,
22 pregnancy, childbirth, breast feeding, and/or related medical conditions and as a
23 result of the discrimination was denied accommodation for pregnancy.

24 **Complainant experienced retaliation** because complainant requested or used a
25 pregnancy-disability related accom. and as a result was denied accommodation for
26 pregnancy.

27 **Additional Complaint Details:**

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 19, 2019, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Manhattan Beach, CA



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
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March 19, 2019

Eyal Farahan
1230 Rosecrans Avenue Suite 210
Manhattan Beach, California 90266

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 201903-05505619
Right to Sue: Carter / California Department of Corrections and Rehabilitation

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) 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, DFEH 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 DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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KEVIN KISH, DIRECTOR

March 19, 2019

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

DFEH Matter Number: 201903-05505619

Right to Sue: Carter / California Department of Corrections and Rehabilitation

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) 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. This case is not being investigated by DFEH and is being closed immediately. 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 DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 19, 2019

Geneva Carter
1103 Manuel Ortiz Ave.
El Centro, California 92243

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201903-05505619
Right to Sue: Carter / California Department of Corrections and Rehabilitation

Dear Geneva Carter,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 19, 2019 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 contact 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.

Sincerely,

Department of Fair Employment and Housing

03/25/2019

COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)

In the Matter of the Complaint of
Geneva Carter

DFEH No. 201903-05505619

Complainant,

vs.

California Department of Corrections and
Rehabilitation
P.O. Box 942883
Sacramento, California 94283

Respondents

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

2. Complainant **Geneva Carter**, resides in the City of **El Centro** State of **California**.

3. Complainant alleges that on or about **March 18, 2019**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sex/gender, pregnancy, childbirth, breast feeding, and/or related medical conditions and as a result of the discrimination was denied accommodation for pregnancy.

Complainant experienced retaliation because complainant requested or used a pregnancy-disability related accom. and as a result was denied accommodation for pregnancy.

Additional Complaint Details:

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 19, 2019, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Manhattan Beach, CA



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 19, 2019

Eyal Farahan
1230 Rosecrans Avenue Suite 210
Manhattan Beach, California 90266

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 201903-05505819
Right to Sue: Chanelo / California Department of Corrections and Rehabilitation

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) 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, DFEH 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 DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

RE: **Notice of Filing of Discrimination Complaint**
DFEH Matter Number: 201903-05505819
Right to Sue: Chanelo / California Department of Corrections and Rehabilitation

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) 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. This case is not being investigated by DFEH and is being closed immediately. 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 DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

Racquel Chanelo
13509 Ave 232
Tulare, California 93274

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201903-05505819
Right to Sue: Chanelo / California Department of Corrections and Rehabilitation

Dear Racquel Chanelo,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 19, 2019 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 contact 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.

Sincerely,

Department of Fair Employment and Housing

03/25/2019

1 **COMPLAINT OF EMPLOYMENT DISCRIMINATION**
2 **BEFORE THE STATE OF CALIFORNIA**
3 **DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**
4 **Under the California Fair Employment and Housing Act**
5 **(Gov. Code, § 12900 et seq.)**

6 **In the Matter of the Complaint of**
7 **Racquel Chanelo**

DFEH No. 201903-05505819

8 Complainant,

9 vs.

10 California Department of Corrections and
11 Rehabilitation
12 P.O. Box 942883
13 Sacramento, California 94283

14 Respondents

15 1. Respondent **California Department of Corrections and Rehabilitation** is an
16 **employer** subject to suit under the California Fair Employment and Housing Act
17 (FEHA) (Gov. Code, § 12900 et seq.).

18 2. Complainant **Racquel Chanelo**, resides in the City of **Tulare** State of **California**.

19 3. Complainant alleges that on or about **March 18, 2019**, respondent took the
20 following adverse actions:

21 **Complainant was discriminated against** because of complainant's sex/gender,
22 pregnancy, childbirth, breast feeding, and/or related medical conditions and as a
23 result of the discrimination was denied accommodation for pregnancy.

24 **Complainant experienced retaliation** because complainant requested or used a
25 pregnancy-disability related accom. and as a result was denied accommodation for
26 pregnancy.

27 **Additional Complaint Details:**
28

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 19, 2019, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Manhattan Beach, CA



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 19, 2019

Eyal Farahan
1230 Rosecrans Avenue Suite 210
Manhattan Beach, California 90266

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 201903-05505919
Right to Sue: Glaude / California Department of Corrections and Rehabilitation

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) 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, DFEH 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 DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

RE: **Notice of Filing of Discrimination Complaint**
DFEH Matter Number: 201903-05505919
Right to Sue: Glaude / California Department of Corrections and Rehabilitation

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) 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. This case is not being investigated by DFEH and is being closed immediately. 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 DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

Melissa Glaude
437 Royal Oaks Dr.
Vacaville, California 95687

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201903-05505919
Right to Sue: Glaude / California Department of Corrections and Rehabilitation

Dear Melissa Glaude,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 19, 2019 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 contact 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.

Sincerely,

Department of Fair Employment and Housing

03/25/2019

COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)

In the Matter of the Complaint of
Melissa Glaude

DFEH No. 201903-05505919

Complainant,

vs.

California Department of Corrections and
Rehabilitation
P.O. Box 942883
Sacramento, California 94283

Respondents

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

2. Complainant **Melissa Glaude**, resides in the City of **Vacaville** State of **California**.

3. Complainant alleges that on or about **March 18, 2019**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sex/gender, pregnancy, childbirth, breast feeding, and/or related medical conditions and as a result of the discrimination was denied accommodation for pregnancy.

Complainant experienced retaliation because complainant requested or used a pregnancy-disability related accom. and as a result was denied accommodation for pregnancy.

Additional Complaint Details:

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 19, 2019, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Manhattan Beach, CA



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March 19, 2019

Eyal Farahan
1230 Rosecrans Avenue Suite 210
Manhattan Beach, California 90266

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 201903-05506219
Right to Sue: Lang / California Department of Corrections and Rehabilitation

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) 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, DFEH 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 DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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KEVIN KISH, DIRECTOR

March 19, 2019

RE: **Notice of Filing of Discrimination Complaint**
DFEH Matter Number: 201903-05506219
Right to Sue: Lang / California Department of Corrections and Rehabilitation

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) 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. This case is not being investigated by DFEH and is being closed immediately. 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 DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

Karen Lang
2180 Ross Ave.
El Centro, California 92243

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201903-05506219
Right to Sue: Lang / California Department of Corrections and Rehabilitation

Dear Karen Lang,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 19, 2019 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 contact 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.

Sincerely,

Department of Fair Employment and Housing

03/25/2019

COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)

In the Matter of the Complaint of
Karen Lang

DFEH No. 201903-05506219

Complainant,

vs.

California Department of Corrections and
Rehabilitation
P.O. Box 942883
Sacramento, California 94283

Respondents

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

2. Complainant **Karen Lang**, resides in the City of **El Centro** State of **California**.

3. Complainant alleges that on or about **March 18, 2019**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sex/gender, pregnancy, childbirth, breast feeding, and/or related medical conditions and as a result of the discrimination was denied accommodation for pregnancy.

Complainant experienced retaliation because complainant requested or used a pregnancy-disability related accom. and as a result was denied accommodation for pregnancy.

Additional Complaint Details:

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 19, 2019, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Manhattan Beach, CA



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

Eyal Farahan
1230 Rosecrans Avenue Suite 210
Manhattan Beach, California 90266

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 201903-05506319
Right to Sue: Powell / California Department of Corrections and Rehabilitation

Dear Eyal Farahan:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) 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, DFEH 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 DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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March 19, 2019

RE: **Notice of Filing of Discrimination Complaint**
DFEH Matter Number: 201903-05506319
Right to Sue: Powell / California Department of Corrections and Rehabilitation

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) 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. This case is not being investigated by DFEH and is being closed immediately. 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 DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

03/25/2019



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

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<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

March 19, 2019

Angela Powell
9393 Emerald Vista Dr.
Elk Grove, California 95624

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 201903-05506319
Right to Sue: Powell / California Department of Corrections and Rehabilitation

Dear Angela Powell,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 19, 2019 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 contact 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.

Sincerely,

Department of Fair Employment and Housing

03/25/2019

COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)

In the Matter of the Complaint of
Angela Powell

DFEH No. 201903-05506319

Complainant,
vs.

California Department of Corrections and
Rehabilitation
P.O. Box 942883
Sacramento, California 94283

Respondents

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

2. Complainant **Angela Powell**, resides in the City of **Elk Grove** State of **California**.

3. Complainant alleges that on or about **March 18, 2019**, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sex/gender, pregnancy, childbirth, breast feeding, and/or related medical conditions and as a result of the discrimination was denied accommodation for pregnancy.

Complainant experienced retaliation because complainant requested or used a pregnancy-disability related accom. and as a result was denied accommodation for pregnancy.

Additional Complaint Details:

1 VERIFICATION

2 I, **Eyal Farahan**, am the **Attorney** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based
4 on information and belief, which I believe to be true.

5 On March 19, 2019, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

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Manhattan Beach, CA