

1 COMES NOW Plaintiff, SAMIRA JUDEH (hereinafter “Plaintiff” or “Samira”),
2 who alleges as follows:

3 **PARTIES**

4 1. Plaintiff is, and at all times relevant to this Complaint, was an individual
5 employed by Defendant, DIGILANT, INC. (hereinafter “DIGILANT” or “Defendant”)

6 2. DIGILANT is, and all times herein mentioned was, a Delaware corporation
7 licensed to do and doing business within the State of California with an office in San
8 Francisco, California, thereby manifesting sufficient contact with the State of California to
9 establish jurisdiction.

10 3. Plaintiff is informed and believes and, based on that information and belief,
11 alleges that, at various times herein mentioned, each of the Defendants was the agent, either
12 direct, ostensible or otherwise, servant, representative of employee of each of the remaining
13 Defendants and, in engaging in certain acts hereinafter alleged, was acting within the
14 course and scope of said agency, service, representation, or employment and materially
15 assisted the other Defendants. Plaintiff is further informed and believes and, based on that
16 information and belief, alleges that each of the Defendants ratified the acts of the remaining
17 Defendants.

18 4. Plaintiff is ignorant of the true names and capacities, whether individual,
19 corporate, associate or otherwise, of Defendants sued herein as Does 1 through 20,
20 inclusive, and therefore sues said Defendants by such fictitious names. Plaintiff is
21 informed and believes and, upon such information and belief, alleges that each of the
22 Defendants designated as a Doe is legally responsible in some manner for the events and
23 happenings referred to herein and caused the damages proximately thereby to Plaintiff as
24 hereinafter alleged. Plaintiff will seek leave of to amend this Demand to show the true
25 names and capacities of said Doe Defendants when same have been ascertained.

26 5. Defendant DIGILANT employs more than 5 persons and is an employer as
27 defined in the California Fair Employment and Housing Act (“FEHA”).
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CASE SUMMARY

6. Samira was wrongfully terminated approximately two and a half weeks after taking time off for a medical appointment and one week after requesting additional time off due to her medical condition.

STATEMENT OF FACTS

7. Samira was hired by DIGILANT’s Senior Vice President, Stephanie Lozito, in February 2017 as Director of Client Solutions with a starting salary of \$160,000 and was responsible for the west region.

8. Samira’s total compensation package also included:

- a. a 10% discretionary bonus; and
- b. employee benefits and insurance programs, including medical, dental, 401(k) and other programs; and
- c. an open vacation policy, meaning vacation, personal, or sick time was allowed on an as-needed basis.

9. On or about March 1, 2017, Samira scheduled a doctor’s appointment for May 1, 2017 on the public calendar.

10. Soon after, Chris Cooper, Vice President of Sales at DIGILANT, began harassing Samira. He was demanding, belligerent, and made sarcastic comments to Samira. The following are examples of Chris Cooper’s inappropriate and unprofessional behavior towards Samira.

11. On or about March 7, 2017, Chris Cooper made an uncalled for sarcastic remark when Samira was not able to meet with him immediately on Skype due to her busy work schedule.

12. On or about March 10, 2017, Chris Cooper chastised Samira for being out of the office that morning for a doctor’s appointment and for allowing two employees on her team to take discretionary time off, which had been pre-planned before she was hired.

13. On or about April 4, 2017, Chris Cooper again made improper sarcastic comments to Samira.

1 14. On or about April 26, 2017, Chris Cooper again became belligerent and
2 yelled at Samira on the phone.

3 15. On or about April 27, 2017, Samira spoke with Colin Brown, Chief
4 Operating Officer of DIGILANT, and informed him for the third time that Chris Cooper
5 was harassing her. Chris Cooper did not respond or address this email with Samira.

6 16. On or about May 1, 2017, Samira attended her previously scheduled doctor's
7 appointment and came into the office immediately afterward. That same day Samira heard
8 Chris Cooper say to Kate Bell, Director of Sales Accounts, about Samira "I don't give a
9 shit what she has going on medically. She's a bitch!"

10 17. On or about May 2, 2017, Samira sent an email to Colin Brown informing
11 him that she has been diagnosed with a medical condition and that she would need to go to
12 additional doctor's appointments. She offered to provide Colin Brown with a doctor's note,
13 but he informed her that it was not necessary.

14 18. On or about May 17, 2017, per Colin Brown's request, Samira sent him an
15 email documenting at least seven instances of Chris Cooper's inappropriate behavior
16 toward Samira.

17 19. On or about May 24, 2017 – **approximately two and a half weeks after she**
18 **informed Colin Brown of her health issues and one week after sending him an email**
19 **about Chris Cooper's inappropriate behavior– Alan Osetek terminated her**
20 **employment**, allegedly for the reason that there was a reduction in the work force.

21 20. No one at DIGILANT ever engaged in a good faith interactive process to
22 determine a reasonable accommodation for Samira even though she had informed Colin
23 Brown that she had been diagnosed with a medical condition.

24 21. DIGILANT never offered or provided Samira with a reasonable
25 accommodation.

26 22. DIGILANT's refusal to engage in a good faith interactive process and failure
27 to provide a reasonable accommodation to Samira was illegal.

28 23. On or about June 8, 2017, DFEH issued a Right to Sue Letter to Plaintiff, a

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true and correct copy of which is attached hereto as **Exhibit 1** and incorporated herein by reference.

FIRST CAUSE OF ACTION

(For Disability Discrimination Against All Defendants)

24. Plaintiff realleges and incorporates herein by reference all of the allegations set forth in paragraphs 1 through 24 as though fully set forth herein.

25. This claim is brought pursuant to CALIFORNIA GOVERNMENT CODE §12940(a) which prohibits discrimination against a person in terms, conditions or privileges of employment on the basis of disability, and the corresponding regulations of the California Fair Employment and Housing Commission, or its successor.

26. At all times herein mentioned, Defendant DIGILANT employed five or more persons, bringing said Defendant employer within the provision of CALIFORNIA GOVERNMENT CODE §12900 et seq., prohibiting employers or their agents from discriminating against employees on the basis of disability.

27. Plaintiff is a member of a protected class within the meaning of the aforementioned GOVERNMENT CODE sections. At all relevant times herein, Plaintiff satisfactorily performed her duties and responsibilities as expected by Defendant and, in fact, exceeded those expectations by her performance.

28. Plaintiff alleges that on May 24, 2017, Defendant DIGILANT wrongfully retaliated against her, discriminated against her, and terminated her on the basis of her disability.

29. As a proximate result of Defendant’s discriminatory conduct, Plaintiff has sustained and continues to sustain substantial loss in past, present and future earnings, career opportunities, bonuses and other employment benefits. Plaintiff’s damages include all consequential, general and special economic damages in amounts to be proven at trial.

30. As a further proximate result of Defendant’s discriminatory conduct, Plaintiff has suffered and continues to suffer humiliation, severe emotional distress and mental and physical pain and anguish, all to her damage in a sum according to proof.

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31. The foregoing acts of Defendant were oppressive, malicious, and despicable, and Plaintiff is, therefore, entitled to an award of punitive damages against Defendant in an amount to be proven at trial.

SECOND CAUSE OF ACTION

(For Failure to Provide Reasonable Accommodation Against All Defendants)

32. Plaintiff realleges and incorporates by reference paragraphs 1 through 32, inclusive, as though fully set forth in detail.

33. This claim is brought pursuant to CALIFORNIA GOVERNMENT CODE §12940(m) which provides that it is an unlawful employment practice “[f]or an employer or other entity covered by this part to fail to make reasonable accommodation for the known physical or mental disability of an applicant or employee”.

34. On or about March 1st and May 2nd and repeatedly thereafter, both in writing and verbally, Plaintiff advised Defendant DIGILANT that she was diagnosed with a medical condition, which limits one or more major life activities, and that she would need to take time off work to attend additional doctor’s appointments for her medical condition but demanded no other restrictions in the performance of her essential job duties. By such notification, Defendant DIGILANT was aware of the restrictions on Plaintiff which would limit her ability to perform her job duties.

35. At all such times, Defendant DIGILANT was under a duty to take affirmative steps to offer Plaintiff an accommodation, including but not limited to, allowing Plaintiff to attend doctor’s appointments necessary for her medical condition.

36. Defendant DIGILANT failed to provide Plaintiff an accommodation and, in fact, actively refused and rejected the accommodation proposed by Plaintiff and instead, on May 24, 2017, illegally terminated her.

37. As a proximate result of Defendant’s wrongful conduct, Plaintiff has sustained and continues to sustain substantial loss in past, present and future earnings, career opportunities, bonuses and other employment benefits. Plaintiff’s damages include all consequential, general and special economic damages in amounts to be proven at trial.

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38. Defendant’s conduct in failing to provide a reasonable accommodation was a substantial factor in causing Plaintiff to suffer and continues to suffer humiliation, severe emotional distress and mental and physical pain and anguish, all to her damage in a sum according to proof.

39. The foregoing acts of Defendant were oppressive, malicious, and despicable, and Plaintiff is, therefore, entitled to an award of punitive damages against Defendant in an amount to be proven at trial.

THIRD CAUSE OF ACTION

(For Failure to Engage in Interactive Process Against All Defendants)

40. Plaintiff realleges and incorporates by reference paragraphs 1 through 40, inclusive, as though fully set forth in detail.

41. This claim is brought pursuant to CALIFORNIA GOVERNMENT CODE §12940(n) which provides that it is an unlawful employment practice “[f]or an employer or other entity covered by this part 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 of known medical condition”.

42. On or about March 1st and May 2nd and repeatedly thereafter, both in writing and verbally, Plaintiff advised Defendant DIGILANT that she was diagnosed with a medical condition which restricted her ability to be physically present in the office at all times during business hours, but demanded no other restrictions in the performance of her essential job duties. By such notification, Defendant DIGILANT was aware of the restrictions on Plaintiff which would limit her ability to perform her job duties.

43. On or about May 24, 2017, rather than engage in an interactive process to determine a reasonable accommodation for Plaintiff, including but not limited to allowing Plaintiff to attend doctor’s appointments necessary for her medical condition, Defendant DIGILANT unjustifiably terminated Plaintiff.

44. As a proximate result of Defendant’s wrongful conduct, Plaintiff has

1 sustained and continues to sustain substantial loss in past, present and future earnings,
2 career opportunities, bonuses and other employment benefits. Plaintiff's damages include
3 all consequential, general and special economic damages in amounts to be proven at trial.

4 45. Defendant DIGILANT's conduct in failing to engage in an interactive
5 process was a substantial factor in causing Plaintiff to suffer and continue to suffer
6 humiliation, severe emotional distress and mental and physical pain and anguish, all to her
7 damage in a sum according to proof.

8 46. The foregoing acts of Defendant were oppressive, malicious, and despicable,
9 and Plaintiff is, therefore, entitled to an award of punitive damages against Defendant in an
10 amount to be proven at trial.

11 **FOURTH CAUSE OF ACTION**

12 **(For Failure to Prevent Discrimination Against All Defendants)**

13 47. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through
14 47, inclusive, as though fully set forth in detail.

15 48. Defendant DIGILANT had a statutory duty, pursuant to CALIFORNIA
16 GOVERNMENT CODE §12940(k) to take all reasonable steps necessary to prevent
17 discrimination from occurring in the workplace.

18 49. Defendant DIGILANT breached its statutory duty to Plaintiff by failing to
19 take all reasonable steps necessary to prevent the discrimination experienced by Plaintiff,
20 ultimately resulting in her wrongful termination.

21 50. As a proximate result of Defendant's wrongful conduct, Plaintiff has
22 sustained and continues to sustain substantial loss in past, present and future earnings,
23 career opportunities, bonuses and other employment benefits. Plaintiff's damages include
24 all consequential, general and special economic damages in amounts to be proven at trial.

25 51. As a further proximate result of Defendant's discriminatory conduct, Plaintiff
26 has suffered and continues to suffer humiliation, severe emotional distress and mental and
27 physical pain and anguish, all to her damage in a sum according to proof.

28 52. The foregoing acts of Defendant were oppressive, malicious, and despicable,

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and Plaintiff is, therefore, entitled to an award of punitive damages against Defendant in an amount to be proven at trial.

FIFTH CAUSE OF ACTION

(For FEHA Retaliation Against All Defendants)

53. Plaintiff realleges and incorporates by reference paragraphs 1 through 53, inclusive, as though fully set forth in detail.

54. Plaintiff believes and thereon alleges that Defendant’s adverse actions taken against her as set forth herein occurred in retaliation for Plaintiff’s membership in a protected class and participation in a protected activity. Such retaliatory actions are unlawful, discriminatory and retaliatory in violation of CALIFORNIA GOVERNMENT CODE §12940 et seq. and have resulted in damages and injury to Plaintiff as alleged herein.

55. As a proximate result of Defendant’s retaliatory acts, Plaintiff has sustained and continues to sustain substantial loss in past, present and future earnings, career opportunities, bonuses and other employment benefits. Plaintiff’s damages include all consequential, general and special economic damages in amounts to be proven at trial.

56. As a further proximate result of Defendant’s retaliatory acts, Plaintiff has suffered and continues to suffer humiliation, severe emotional distress and mental and physical pain and anguish, all to her damage in a sum according to proof.

57. The foregoing acts of Defendant were oppressive, malicious, and despicable, and Plaintiff is, therefore, entitled to an award of punitive damages against Defendant in an amount to be proven at trial.

SIXTH CAUSE OF ACTION

(For Wrongful Termination in Violation of Public Policy Against All Defendants)

58. Plaintiff realleges and incorporates by reference paragraphs 1 through 58, inclusive, as though fully set forth in detail.

59. On May 24, 2017, Plaintiff was suffering from a medical condition, which limited one or more life activities.

1 60. Defendant DIGILANT refused to provide an accommodation to Plaintiff for
2 her known medical condition even though Defendant DIGILANT knew about said medical
3 condition.

4 61. Defendant DIGILANT also refused to engage in an interactive process to
5 determine a reasonable accommodation for Plaintiff. Instead, she was “laid off.”

6 62. At all times relevant herein, there existed fundamental and established
7 California public policies, as codified by case law and statute, including but not limited to:
8 (a) CALIFORNIA GOVERNMENT CODE §12940(a); (b) CALIFORNIA GOVERNMENT
9 CODE §12940(h); (c) CALIFORNIA GOVERNMENT CODE §12940(k); (d)
10 CALIFORNIA GOVERNMENT CODE §12940(m); and (e) CALIFORNIA
11 GOVERNMENT CODE §12940(n).

12 63. On or about May 24, 2017, Defendant DIGILANT violated California public
13 policies by wrongfully terminating Plaintiff on the basis of disability; by failing to provide
14 Plaintiff an accommodation for her known disability; by failing to engage in an interactive
15 process with Plaintiff; by failing to prevent discrimination toward Plaintiff and by
16 terminating Plaintiff in retaliation for exercising her right to request an accommodation to
17 allow her to attend necessary doctor’s appointments for her medical condition.

18 64. As a proximate result of Defendant’s wrongful termination in violation of the
19 public policy of the State of California, Plaintiff has sustained and continues to sustain
20 substantial loss in past, present and future earnings, career opportunities, bonuses and other
21 employment benefits. Plaintiff’s damages include all consequential, general and special
22 economic damages in amounts to be proven at trial.

23 65. As a further proximate result of Defendant’s wrongful termination in
24 violation of the public policy of the State of California, Plaintiff has suffered and continues
25 to suffer humiliation, severe emotional distress and mental and physical pain and anguish,
26 all to her damage in a sum according to proof.

27 66. The foregoing acts of Defendant were oppressive, malicious, and despicable,
28 and Plaintiff is, therefore, entitled to an award of punitive damages against Defendant in an

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amount to be proven at trial.

SEVENTH CAUSE OF ACTION

(For Violation of Business & Professions Code §17200 Against All Defendants)

67. Plaintiff realleges and incorporates by reference paragraphs 1 through 67, inclusive, as though fully set forth in detail.

68. Plaintiff is informed and believes and, based on that information and belief, alleges that Defendant DIGILANT created, devised, developed, supervised and approved employment practices and protocols which directly impacted Plaintiff's employment.

69. Plaintiff is informed and believes and, based on that information and belief, alleges that by implementing policies and protocols which are discriminatory and in direct contravention of public policy, Defendant DIGILANT intended to reduce its overhead and maximize its profits.

70. Plaintiff relied upon, by accepting and continuing her employment with Defendant DIGILANT, Defendant's representations that it did not mandate or approve discriminatory policies in hiring and retaining its employees, including but not limited to discrimination based on disability. However, as described herein, Plaintiff was subjected, to her detriment, to discriminatory policies implemented and executed by Defendant.

71. Defendant DIGILANT, by the conduct described herein, has engaged in an unfair and fraudulent business practice within the meaning of Business & Professions Code §17200.

72. Defendant DIGILANT's employment policies and protocols, as implemented and described herein, resulted in the unjustifiable and abrupt termination of Plaintiff's employment, for which she incurred, and continues to incur, monetary loss in earnings and employment benefits.

73. As a direct and proximate result of Defendant DIGILANT's conduct, Plaintiff is entitled to restitution.

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PRAYER FOR RELIEF


WHEREFORE, Plaintiff SAMIRA JUDEH prays for judgment as follows:

FOR ALL CAUSES OF ACTION:

1. Compensatory damages, including loss of wages (front and back pay), career opportunities, benefits and other opportunities of employment;
2. Special damages in a sum to be proven at trial;
3. Punitive damages in a sum to be proven at trial;
4. Interest, including pre-judgment interest, thereon at the legal rate, including but not limited to CIVIL CODE §3291;
5. Attorney’s fees according to proof, pursuant to CALIFORNIA GOVERNMENT CODE §12965, or other applicable statutes or contracts;
6. Costs of suit incurred herein; and
7. Such other and further relief as to the Court may seem just and proper.

Dated: August 30, 2017

ADISHIAN LAW GROUP, P.C.

By: 

Christopher M. Adishian
Cynthia Y. Sun
Attorney for Plaintiff
Samira Judeh

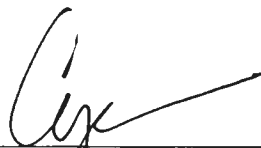
DEMAND FOR JURY TRIAL

Plaintiff SAMIRA JUDEH demands a trial by jury as to all claims triable by a jury.

Dated: August 30, 2017

ADISHIAN LAW GROUP, P.C.

By:



Christopher M. Adishian
Cynthia Y. Sun
Attorney for Plaintiff
Samira Judeh

ADISHIAN LAW GROUP, P.C.

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EXHIBIT 1

EXHIBIT 1



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

June 08, 2017

Chris Adishian
222 N. Sepulveda Blvd., Ste. 2000
El Segundo California 90245

RE: Notice to Complainant or Complainant's Attorney

DFEH Matter Number: 897152-293971

Right to Sue: Judeh / Digilant, Inc.

Dear Complainant or Complainant's Attorney:

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 or your attorney must serve the complaint. If you do not have an attorney, you must serve the complaint yourself. 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.

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



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

June 08, 2017

RE: Notice of Filing of Discrimination Complaint

DFEH Matter Number: 897152-293971

Right to Sue: Judeh / Digilant, Inc.

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



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

June 08, 2017

Samira Judeh
820 Hensley Avenue
San Bruno, California 94066

RE: Notice of Case Closure and Right to Sue
DFEH Matter Number: 897152-293971
Right to Sue: Judeh / Digilant, Inc.

Dear Samira Judeh,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective June 08, 2017 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.

Sincerely,

Department of Fair Employment and Housing



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

Enclosures

cc:

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 Samira Judeh, Complainant.
8 820 Hensley Avenue
9 San Bruno, California 94066

DFEH No. 897152-293971

9 vs.

10 Digilant, Inc., Respondent.
11 442 Post Street, Suite 800
12 San Francisco, California 94102

13 Complainant alleges:

14 1. Respondent **Digilant, Inc.** is a **Private Employer** subject to suit under the
15 California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).
16 Complainant believes respondent is subject to the FEHA.

17 2. On or around **May 24, 2017**, complainant alleges that respondent took the
18 following adverse actions against complainant: **Discrimination, Harassment,**
19 **Retaliation Asked impermissible non-job-related questions, Demoted, Denied**
20 **a good faith interactive process, Denied a work environment free of**
21 **discrimination and/or retaliation, Denied continuation of employer-paid health**
22 **care coverage while on pregnancy disability leave, Denied employment,**
Denied equal pay, Denied family care or medical leave, Denied or forced to
transfer, Denied pregnancy leave, Denied promotion, Denied reasonable
accommodation, Denied reinstatement, Denied the right to wear pants, Forced
to quit, Laid-off, Terminated, Tested for genetic characteristics, Other, as
revealed during discovery.. Complainant believes respondent committed these
actions because of their: **Age - 40 and over, Ancestry, Association with a**
member of a protected class, Color, Disability, Engagement in Protected
Activity, Family Care or Medical Leave, Genetic Information [information about
genetic tests or participation in clinical research or manifestation of disease],
Marital Status, Medical Condition - Including cancer or cancer related medical
condition or genetic characteristics, National Origin - Including language use

restrictions, Race, Religion, Sex - Gender, Sex - Gender identity or Gender expression, Sex - Pregnancy, Sexual Orientation, Other, Military or Veteran status as revealed during discovery..

3. Complainant **Samira Judeh** resides in the City of **San Bruno**, State of **California**. If complaint includes co-respondents please see below.

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Additional Complaint Details:

The following is stated on the information and belief: Digilant discriminated against Samira on the basis of her disability and/or medical condition, and/or perceived disability or medical condition, and retaliated against her when she complained about the Company`s actions. After Samira offered to supply doctor`s notes, the Company told her that it was not necessary and then terminated Samira.

1 VERIFICATION

2 I, **Chris Adishian**, am the Attorney for Complainant in the above-entitled complaint.
3 I have read the foregoing complaint and know the contents thereof. The same is
4 true of my own knowledge, except as to those matters which are therein alleged on
5 information and belief, and as to those matters, I believe it to be true.

6 On June 08, 2017, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

8 **El Segundo, CA**
9 **Chris Adishian**