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San Francisco, CA 94104
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Attorneys for Plaintiff
CARMEN AUSTIN

IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA
[UNLIMITED JURISDICTION]

CARMEN AUSTIN, an individual,)
)
 Plaintiff,)
)
 v.)
)
 STORAGEPRO MANAGEMENT, INC.,)
 a California corporation; STORAGE)
 GUYS, a business entity form unknown;)
 TANYA LOWRY, an individual; and)
 DOES 1-50, inclusive,)
)
 Defendants.)

Case No. _____
PLAINTIFF’S COMPLAINT FOR DAMAGES, INJUNCTIVE AND DECLARATORY RELIEF FOR:
1. Wrongful Termination in Violation of Public Policy;
2. Discrimination on the Basis of Race, Color, and Ancestry in Violation of FEHA;
3. Harassment on the Basis of Race, Color, and Ancestry in Violation of the FEHA;
4. Retaliation in Violation of the FEHA;
5. Failure to Prevent Discrimination, Harassment, and Retaliation in Violation of the FEHA;
6. Retaliation in Violation of Labor Code Section 1102.5; and
7. Unreimbursed Business Expenses In Violation of Labor Code section 2802.

JURY TRIAL DEMAND

1 Plaintiff alleges:

2 **PARTIES**

3 ***PLAINTIFF***

- 4 1. Plaintiff CARMEN AUSTIN, (“Plaintiff” or “AUSTIN”) is an adult of mixed racial
5 background. Plaintiff was employed by Defendants STORAGEPRO MANAGEMENT,
6 INC. and STORAGE GUYS within the meaning of the Fair Employment & Housing Act
7 (the “FEHA”) and the California Labor Code. Defendant TANYA LOWRY
8 (“LOWRY”) was Plaintiff’s supervisor within the meaning of the FEHA.

9 ***DEFENDANTS***

- 10 2. Defendant STORAGEPRO MANAGMENT, INC. (“STORAGEPRO”) is a corporation
11 headquartered in California and doing business currently and at all relevant times in the
12 complaint in California. At all times relevant to this complaint, STORAGEPRO is an
13 employer and covered entity within the meaning of the California Labor Code and the
14 FEHA. On information and belief, STORAGEPRO operates a business under the D/B/A
15 Storage Guys in the city of Suisun, California. The D/B/A “Storage Guys” is
16 unregistered in Solano County’s fictitious business name registry.
- 17 3. Defendant STORAGE GUYS is a business of form unknown. STORAGE GUYS is not
18 registered with the California Secretary of State. STORAGE GUYS does business in
19 California. At all times relevant to this complaint, STORAGE GUYS is an employer and
20 covered entity within the meaning of the California Labor Code and the FEHA.
- 21 4. Hereinafter, Defendants STORAGEPRO, STORAGE GUYS, and DOES 1-20 are
22 collectively referred to as EMPLOYER DEFENDANTS.
- 23 5. Defendant TANYA LOWRY is an individual employed by one or both EMPLOYER
24 DEFENDANTS.
- 25 6. The true names and capacities of defendants sued in the Complaint under the fictitious
26 name of DOES 1 through 50, inclusive, are unknown to plaintiff who therefore sues
27 defendants by such fictitious names. Plaintiff will amend this complaint to allege their
28 true names and capacities when ascertained. Plaintiff is informed and believes, and

1 thereon alleges, that each of said fictitiously named defendants is responsible in some
2 manner for the occurrences herein alleged, and that Plaintiff’s injuries as herein alleged
3 were proximately caused by such unlawful conduct.

4 7. On information and belief, EMPLOYER DEFENDANTS are an integrated enterprise
5 with other business operations and/or was operated in such a manner that its corporate
6 form should not be observed such that it does not insulate its owners from liability
7 accrued by EMPLOYER DEFENDANTS. On information and belief, DOES 1 through
8 20 are in fact Plaintiff’s employer and/or liable for the misdeeds of EMPLOYER
9 DEFENDANTS.

10 8. Hereinafter, EMPLOYER DEFENDANTS, LOWRY, and DOES 21 through 50 are
11 collectively referred to as “Defendants.”

12 9. Whenever reference is made in this complaint to any act of any corporate or other
13 business defendant, such allegations shall mean that such defendant did the acts alleged
14 in the complaint through its officers, directors, employees, agents and/or representatives
15 while they were acting within the actual or ostensible scope of their authority.
16 Additionally, whenever reference is made to any act of any natural person employed by
17 any corporate or other business entity Defendant, such allegations shall mean that such
18 person did the acts alleged in the complaint while acting within the scope of their actual
19 or ostensible authority.

20 10. Plaintiff is informed and believes and thereon alleges that at all relevant times, each
21 defendant acted as an agent, representative, employer and/or employee of each of the
22 other defendants and acted within the course and scope of said agency or representation
23 or employment with respect to the causes of action in this complaint.

24 **JURISDICTION & VENUE**

25 11. Plaintiff brings this action pursuant to and under California common and statutory laws.

26 12. Venue is proper in this Court because the acts and/or omissions and events set forth in
27 this Complaint occurred in whole or in part in the County of Contra Costa, located in
28 California. The Defendants are headquartered in Contra Costa County, maintained

1 Plaintiff's employment records in Contra Costa County, and made discriminatory and
2 retaliatory decisions and carried out those decisions in County of Contra Costa.

3 13. The amount in controversy exceeds the minimum jurisdictional threshold of this Court.

4 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

5 14. Plaintiff has discharged all necessary administrative remedies and this matter is ripe for
6 adjudication before this Court. On February 14, 2024, Plaintiff filed a complaint of
7 discrimination against Defendants with the California Civil Rights Department ("CRD")
8 which encompasses the illegal acts alleged herein. On February 14, 2024, Plaintiff
9 received a notice of case closure and received a right-to-sue notification. These
10 documents are attached hereto as *Exhibit A*.

11 **GENERAL FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

12 15. Ms. AUSTIN commenced employment with EMPLOYER DEFENDANTS in or about
13 September 2022. From October 2022 through Plaintiff's termination on January 16,
14 2023, Plaintiff worked with Kristine, a property manager, and Defendant Tanya Lowdry,
15 also a property manager. Both Kristine and Tanya Lowry were Plaintiff's supervisors
16 within the meaning of the FEHA.

17 16. As stated, Plaintiff is mixed race African American, Native American, and Portuguese.
18 Plaintiff is dark skinned.

19 17. Throughout Ms. Austin's employment, Ms. Austin was subjected to a hostile working
20 environment on the basis of her race, color, and ancestry, including but not limited to
21 inadequate training, micro-management, unwarranted discipline, poor job assignments,
22 and unwanted and hostile verbal abuse. Kristine called Plaintiff a "bitch." Kristine, who
23 herself called Plaintiff a "bitch," told Plaintiff that Ms. Lowry was racist. Kristine, who
24 is white with a mixed racial child, told Plaintiff that Ms. Lowry had complimented her
25 daughter once by telling her that she "was cool" and "not like other black girls." Among
26 the many terrible things that Ms. Lowry put Plaintiff through while she was employed,
27 Ms. Lowry pointed to a tree's fallen branch and told Plaintiff that her brother calls "these
28 ones nigger beaters."

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18. Others observed the hostile environment, and one customer told Plaintiff that she needed to call the Department of Fair Employment and Housing and that she would be a witness for Plaintiff on the discriminatory treatment that she received.

19. EMPLOYER DEFENDANT's also recycled paper in the office (e.g., used old customer files in the printer rather than purchasing new paper). The paper that was used had confidential and private information of customers displayed, including photocopies of I.D. cards, credit cards, etc. Plaintiff reasonably believed that this practice was unlawful and violated the privacy rights of the customers whose information was being distributed around. Plaintiff opposed that conduct and was retaliated against for her opposition.

20. Plaintiff reported the harassment to EMPLOYER DEFENDANTS, and EMPLOYER DEENDANTS did not react in a reasonable manner to conclude the harassment. In fact, EMPLOYER DEFENDANTS retaliated against Plaintiff instead.

21. On January 16, 2023, Plaintiff's employment was terminated. Plaintiff's termination was substantially motivated by her Race, Color, and Ancestry, as well as in retaliation for her complaints regarding conduct prohibited by the FEHA and failure to safeguard other's confidential information with which they were obligated to safeguard.

FIRST CAUSE OF ACTION

Wrongful Termination in Violation of Public Policy
[Against EMPLOYER DEFENDANTS]

22. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in this complaint as though fully set forth herein.

23. California has fundamental, substantial, and well-established public policies against terminating employees due to their Race, Color, and Ancestry, as well as against terminating an employee's employment in retaliation for opposing conduct prohibited by the FEHA and failure to secure other's confidential information.

24. Employer Defendants violated California public policy when each took adverse actions against Plaintiff, including but not limited to discriminating against her and retaliating against her by terminating her employment in response to her for her opposition to its conduct which violated public policy.

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25. Employer Defendants’ wrongful termination of Plaintiff’s employment caused her economic and noneconomic harm in an amount to be proven at trial, but which are in excess of the minimum jurisdiction of this court. Plaintiff’s damages include, but are not limited to, loss of earnings and benefits, humiliation, embarrassment, mental and emotional distress and discomfort.

26. Employer Defendants committed and/or ratified the acts herein alleged maliciously, fraudulently, and oppressively with the wrongful intention of injuring Plaintiff, and acted with an improper and evil motive amounting to malice, in conscious disregard for Plaintiff’s rights and thus an award of exemplary and punitive damages is justified. Plaintiff is therefore entitled to recover and herein prays for punitive damages.

WHEREFORE, Plaintiff prays for a judgment for damages, including punitive damages, injunctive and declaratory relief as more fully set forth below.

SECOND CAUSE OF ACTION

Discrimination on the Basis of Race, Color, and Ancestry in Violation of the FEHA
[Against EMPLOYER DEFENDANTS]

27. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in this complaint as though fully set forth herein.

28. The FEHA makes it unlawful for an employer to discriminate against an employee on the basis of her race, color and/or ancestry. *See Govt. Code § 12940(a).*

29. Employer Defendants terminated Plaintiff’s employment. Plaintiff is informed and believes and thereon alleges that Plaintiff’s ancestry, race and/or color were substantial motivating factors for Employer Defendants’ decision to terminate Plaintiff’s employment.

30. Employer Defendants’ discriminatory treatment of Plaintiff caused her economic and noneconomic harm in an amount to be proven at trial, but which are in excess of the minimum jurisdiction of this court. Plaintiff’s damages include, but are not limited to, loss of earnings and benefits, humiliation, embarrassment, mental and emotional distress and discomfort.

1 31. Employer Defendants committed and/or ratified the acts herein alleged maliciously,
2 fraudulently, and oppressively with the wrongful intention of injuring Plaintiff, and acted
3 with an improper and evil motive amounting to malice, in conscious disregard for
4 Plaintiff's rights and thus an award of exemplary and punitive damages is justified.
5 Plaintiff is therefore entitled to recover and herein prays for punitive damages.

6 WHEREFORE, Plaintiff prays for a judgment for damages, including punitive damages,
7 injunctive and declaratory relief as more fully set forth below.

8 **THIRD CAUSE OF ACTION**

9 *Harassment on the Basis of Race, Color, and Ancestry in Violation of the FEHA*
[Against all Defendants]

10 32. Plaintiff re-alleges and incorporates herein by reference each and every allegation
11 contained in this complaint as though fully set forth herein.

12 33. Defendants created a hostile working environment for Plaintiff on the basis of her race,
13 color, and ancestry in violation of the FEHA.

14 34. Defendants' harassment of Plaintiff caused her economic and noneconomic harm in an
15 amount to be proven at trial, but which are in excess of the minimum jurisdiction of this
16 court. Plaintiff's damages include, but are not limited to, loss of earnings and benefits,
17 humiliation, embarrassment, mental and emotional distress and discomfort.

18 35. Defendants committed and/or ratified the acts herein alleged maliciously, fraudulently,
19 and oppressively with the wrongful intention of injuring Plaintiff, and acted with an
20 improper and evil motive amounting to malice, in conscious disregard for Plaintiff's
21 rights and thus an award of exemplary and punitive damages is justified. Plaintiff is
22 therefore entitled to recover and herein prays for punitive damages.

23 WHEREFORE, Plaintiff prays for a judgment for damages, including punitive damages,
24 injunctive and declaratory relief as more fully set forth below.

25 **FOURTH CAUSE OF ACTION**

26 *Retaliation in Violation of the FEHA*
[Against EMPLOYER DEFENDANTS]

27 36. Plaintiff re-alleges and incorporates herein by reference each and every allegation
28 contained in this complaint as though fully set forth herein.

- 1 37. Plaintiff engaged in activities that are protected by the FEHA, including reporting and
2 opposing discrimination and harassment.
- 3 38. Plaintiff's engagement in those protected activities was a substantial motivating reason
4 for Employer Defendants to retaliate against Plaintiff.
- 5 39. Employer Defendants' retaliation against Plaintiff caused her economic and noneconomic
6 harm in an amount to be proven at trial, but which are in excess of the minimum
7 jurisdiction of this court. Plaintiff's damages include, but are not limited to, loss of
8 earnings and benefits, humiliation, embarrassment, mental and emotional distress and
9 discomfort.
- 10 40. Employer Defendants committed and/or ratified the acts herein alleged maliciously,
11 fraudulently, and oppressively with the wrongful intention of injuring Plaintiff, and acted
12 with an improper and evil motive amounting to malice, in conscious disregard for
13 Plaintiff's rights and thus an award of exemplary and punitive damages is justified.
14 Plaintiff is therefore entitled to recover and herein prays for punitive damages.

15 WHEREFORE, Plaintiff prays for a judgment for damages, including punitive damages,
16 injunctive and declaratory relief as more fully set forth below.

17 **FIFTH CAUSE OF ACTION**

18 *Failure to Prevent Discrimination, Harassment, and Retaliation in violation of the FEHA*
19 [Against Defendant EMPLOYER DEFENDANTS and DOES 1-20]

- 20 41. Plaintiff re-alleges and incorporates herein by reference each and every allegation
21 contained in this complaint as though fully set forth herein.
- 22 42. Defendants discriminated against, harassed, and retaliated against Plaintiff in violation of
23 the FEHA.
- 24 43. Defendants violated the FEHA by failing to prevent such unlawful conduct.
- 25 44. Employer Defendants' failure to prevent discrimination, harassment, and retaliation
26 caused Plaintiff economic and noneconomic harm in an amount to be proven at trial, but
27 which are in excess of the minimum jurisdiction of this court. Plaintiff's damages
28 include, but are not limited to, loss of earnings and benefits, humiliation, embarrassment,
mental and emotional distress and discomfort.

1 45. Employer Defendants committed and/or ratified the acts herein alleged maliciously,
2 fraudulently, and oppressively with the wrongful intention of injuring Plaintiff, and acted
3 with an improper and evil motive amounting to malice, in conscious disregard for
4 Plaintiff's rights and thus an award of exemplary and punitive damages is justified.
5 Plaintiff is therefore entitled to recover and herein prays for punitive damages.

6 WHEREFORE, Plaintiff prays for a judgment for damages, including punitive damages,
7 injunctive and declaratory relief as more fully set forth below.

8 **SIXTH CAUSE OF ACTION**

9 *Retaliation in Violation of Labor Code section 1102.5*

10 [Against Defendant EMPLOYER DEFENDANTS and DOES 1-20]

11 46. Plaintiff re-alleges and incorporates herein by reference each and every allegation
12 contained in this complaint as though fully set forth herein.

13 47. Plaintiff engaged in activities that are protected by the FEHA, including opposing and
14 reporting unlawful discrimination, harassment, and retaliation. Plaintiff also engaged in
15 other protected activities including, but not limited to, reporting and opposing
16 Defendants' creation of duplicates of customers' confidential information and then failure
17 to maintain those records in confidence.

18 48. Plaintiff's engagement in those protected activities was a substantial motivating reason
19 for Employer Defendants to retaliate against Plaintiff.

20 49. Employer Defendants' retaliation against Plaintiff caused her economic and noneconomic
21 harm in an amount to be proven at trial, but which are in excess of the minimum
22 jurisdiction of this court. Plaintiff's damages include, but are not limited to, loss of
23 earnings and benefits, humiliation, embarrassment, mental and emotional distress and
24 discomfort.

25 50. Employer Defendants committed and/or ratified the acts herein alleged maliciously,
26 fraudulently, and oppressively with the wrongful intention of injuring Plaintiff, and acted
27 with an improper and evil motive amounting to malice, in conscious disregard for
28

1 Plaintiff's rights and thus an award of exemplary and punitive damages is justified.

2 Plaintiff is therefore entitled to recover and herein prays for punitive damages.

3 WHEREFORE, Plaintiff prays for a judgment for damages, including punitive damages,
4 injunctive and declaratory relief as more fully set forth below.

5 **SEVENTH CAUSE OF ACTION**

6 *Unreimbursed Business Expenses in Violation of Labor Code section 2802*
7 [Against Defendant EMPLOYER DEFENDANTS and DOES 1-20]

8 51. Plaintiff re-alleges and incorporates herein by reference each and every allegation
9 contained in this complaint as though fully set forth herein.

10 52. Plaintiff incurred business expenses that Employer Defendants knew she incurred, and
11 she was not reimbursed those expenses by Employer Defendants in violation of *Labor*
12 *Code section 2802*.

13 WHEREFORE, Plaintiff prays for a judgment for damages as more fully set forth below.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff makes the following demand:

- 16 a) That process be issued and served as provided by law, requiring Defendants, and each of
17 them, to appear and answer or face judgment;
- 18 b) For general damages and emotional distress in the amount of \$1,500,000, special
19 damages and economic damages in the amount of \$500,000, actual damages in the
20 amount of \$500,000, compensatory damages in the amount of \$2,000,000 and/or nominal
21 damages, as against Defendants, and each of them, in an amount to be determined at trial;
- 22 c) For front and back pay and other benefits Plaintiff would have been afforded but-for
23 Defendants', and each of their, unlawful conduct in the amount of \$500,000;
- 24 d) For punitive damages in an amount of \$6,000,000 to punish, penalize and/or deter
25 Defendants, and each of them, from further engaging in the conduct described herein, and
26 to deter others from engaging in the same or similar acts;
- 27 e) For a Declaration that Defendants, and each of them, : (1) discriminated against Plaintiff
28 in violation of the FEHA as alleged herein; (2) harassed Plaintiff in violation of the
FEHA as alleged herein; (3) retaliated against Plaintiff in violation of the FEHA as


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alleged herein; (4) failed to prevent discrimination, harassment, and retaliation in violation of the FEHA as alleged herein; and (5) retaliated against Plaintiff in violation of *Labor Code section 1102.5* as alleged herein.

- f) For unreimbursed business expenses in an amount of \$1000 pursuant to *Labor Code section 2802*.
- g) For an injunction requiring each Defendant to develop and implement policies related to discrimination, harassment, retaliation, and leave policies that comply with the FEHA and Labor Code, to post conspicuous notifications to employees and customers that Defendants have been adjudicated to have committed such acts and to notify said persons about their legal rights in the event of such conduct, and appointing Plaintiff and her Counsel to oversee the development and proper implementation of said policies at Defendant's expense for a period of not less than five years;
- h) For penalties provided for by statute;
- i) For costs and expenses of this litigation;
- j) For reasonable attorneys' fees pursuant to *Govt. Code section 12965, Labor Code sections 1102.5, Labor Code section 2802* or where otherwise statutorily authorized and appropriate;
- k) For pre- and post-judgment interest on all damages and other relief awarded herein from all entities against whom such relief may be properly awarded; and,
- l) For all such other relief as this Court deems just and appropriate.

Dated: March 22, 2024

Le Clerc & Le Clerc LLP

By: 

Christopher R. LeClerc, ESQ.
Attorney for Plaintiff
CARMEN AUSTIN


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PLAINTIFF DEMANDS A TRIAL BY JURY

Dated: March 22, 2024

Le Clerc & Le Clerc LLP

By: 

Christopher R. LeClerc, ESQ.
Attorney for Plaintiff
CARMEN AUSTIN

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EXHIBIT A



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

February 14, 2024

RE: Notice of Filing of Discrimination Complaint
CRD Matter Number: 202402-23630614
Right to Sue: Austin / StoragePro Management, Inc. et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) 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. 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 CRD is requested or required.

Sincerely,

Civil Rights Department



Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

February 14, 2024

Carmen Austin
, CA

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202402-23630614
Right to Sue: Austin / StoragePro Management, Inc. et al.

Dear Carmen Austin:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective February 14, 2024 because an immediate Right to Sue notice was requested.

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 CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

1 **Complainant was harassed** because of complainant's ancestry, color, race (includes
2 hairstyle and hair texture).

3 **Complainant was discriminated against** because of complainant's ancestry, color, other,
4 race (includes hairstyle and hair texture) and as a result of the discrimination was
5 terminated, laid off, reprimanded, asked impermissible non-job-related questions, other,
6 denied work opportunities or assignments.

7 **Complainant experienced retaliation** because complainant reported or resisted any form
8 of discrimination or harassment and as a result was terminated, laid off, reprimanded, asked
9 impermissible non-job-related questions, other, denied work opportunities or assignments.

10 **Additional Complaint Details:** Complainant was subjected to discrimination and a hostile
11 working environment based upon her ancestry, race, and color. She was micromanaged,
12 reprimanded, disciplined, denied training, and spoken to in an aggressive and hostile way
13 and belittled on a daily basis. She was required to perform job duties that were punitive and
14 related to her ancestry, race, and color. She was accused of stealing \$1 from a bank
15 deposit after the company sent someone to attempt to catch her doing something wrong.
16 Respondent Tanya Lowry told Plaintiff that a fallen tree branch was a "nigger beater."
17 Customers of the facilities reported to Complainant while she was working that Ms. Lowry
18 had told them the same thing. The store was hostile towards other African American / Black
19 and other customers of color. The mistreatment was broadranging and unlawful under the
20 FEHA. I reported the discrimination and harassment to my employers and they terminated
21 my employment several times over the approximate two months of my employment, most
22 recently on December 27, 2022 wherein I also explained that I was being retaliated against.
23 I also complained of the fact that Ms. Lowry failed to protect and misused customer's private
24 and confidential information. My employment was terminated on January 16, 2023 for
25 pretextual reasons. I believe that my termination was substantially motivated by my
26 ancestry, race, and color, together with my complaints of discrimination and harassment and
27 my objection to her misuse of customer information.

1 VERIFICATION

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

5 On February 14, 2024, I declare under penalty of perjury under the laws of the State
6 of California that the foregoing is true and correct.

7 **Vallejo, California**

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Date Filed: February 14, 2024

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