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MEJGAN AFSHAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

MEJGAN AFSHAN, an individual,

Plaintiff,

v.

COUNCIL ON AMERICAN-ISLAMIC
RELATONS, CALIFORNIA, a California
corporation; DUSTIN CRAUN, an individual;
and DOES 1 through 25, Inclusive,

Defendants.

Case No.: 37-2021-00000977-CU-WT-CTL

**PLAINTIFF'S FIRST AMENDED
COMPLAINT FOR DAMAGES:**

1. GENDER DISCRIMINATION [Cal. Gov't Code §12940(a)];
2. RELIGIOUS DISCRIMINATION [Cal. Gov't Code §12940(a)];
3. RETALIATION [Cal. Gov't Code §12940(h)];
4. HARASSMENT- HOSTILE WORK ENVIRONMENT [Cal. Gov't Code §12940(j)];
5. FAILURE TO PREVENT DISCRIMINATION [Cal. Gov't Code §12940(k)];
6. WRONGFUL CONSTRUCTIVE TERMINATION IN VIOLATION OF PUBLIC POLICY [Cal. Gov't. Code §12940 *et seq.*];
7. NEGLIGENT SUPERVISION;
8. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

[JURY TRIAL DEMANDED]

COMES NOW THE PLAINTIFF, alleging against Defendants as follows:

1 **GENERAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

- 2 1. Plaintiff, Mejgan Afshan (hereinafter “Plaintiff” or “Afshan”) is a natural person who is, and
3 at all relevant times was, a resident of the United States and a domiciliary of the State of
4 California.
- 5 2. Plaintiff is informed and believes, and thereon alleges, that Defendant COUNCIL ON
6 AMERICAN-ISLAMIC RELATIONS, CALIFORNIA, (hereinafter “CAIR” or collectively
7 “Defendants”) is a California corporation doing business in the State of California, and is
8 subject to suit under the California Fair Employment and Housing Act (FEHA), California
9 Government Code §12940 et seq.
- 10 3. Plaintiff is informed and believes, and thereon alleges, that Defendant DUSTIN CRAUN
11 (hereinafter “Craun” or collectively “Defendants”) is a natural person who is, and at all
12 relevant times was, a resident of the United States and a domiciliary of the State of
13 California, and an employee of Defendant CAIR.
- 14 4. Plaintiff is ignorant to the true names and capacities of the Defendants sued herein as DOES
15 1 through 25. Plaintiff therefore sues these defendants by such fictitious names and will
16 amend this First Amended Complaint to allege the true names and capacities when they are
17 ascertained.
- 18 5. Plaintiff believes and thereon alleges that each fictitiously named defendant is responsible in
19 some manner for the occurrences herein alleged, and that Plaintiff’s injuries and damages as
20 herein alleged are directly, proximately, and/or legally caused by defendants and all of their
21 acts.
- 22 6. Plaintiff believes and thereon alleges that each of these defendants named herein as DOES
23 are the agents, employers, representatives, or employees of the other named defendants and
24 when performing the acts alleged herein, were acting within the scope of their agency,
25 employment and/or representative capacity and are therefore responsible for the acts
26 complained of herein.
- 27 7. The tortious acts and omissions alleged to have occurred herein were performed by the
28 management-level employees of Defendants.

- 1 8. At all times mentioned herein, Cal. Gov't Code §12940, et seq., was in full force and effect
2 and was binding on Defendants.
- 3 9. The actions of Defendants against Plaintiff constitute unlawful employment practices in
4 violation of multiple sections of Cal. Gov't Code §12940, et seq., as herein alleged, and
5 have caused and will continue to cause, Plaintiff loss of earnings.
- 6 10. Defendants committed these acts alleged herein maliciously, fraudulently, and oppressively,
7 and with the wrongful intention of injuring Plaintiff, and acted with an improper and evil
8 motive amounting to malice or despicable conduct. Alternatively, Defendants' wrongful
9 conduct was carried out with a conscious disregard for Plaintiff's rights.
- 10 11. Prior to the acts and omissions complained of herein, CAIR knew or should have known that
11 discrimination of any kind, including religious discrimination, violated public policies
12 designed to prevent discrimination to protect employees, and the general public.
- 13 12. Prior to the acts and omissions complained of herein, CAIR knew or should have known that
14 allowing unlawful retaliation of any kind, including retaliation in violation of the
15 Government Code, violated public policies designed to prevent discrimination to protect
16 employees, and the general public.
- 17 13. CAIR knew or should have known that it had a duty to train its employees to prevent
18 discrimination of any kind, including gender discrimination and religious discrimination.
- 19 14. CAIR knew or should have known that it had a duty to supervise its employees to prevent
20 discrimination of any kind, including gender discrimination and religious discrimination.
- 21 15. CAIR knew or should have known that it had a duty to ensure its employees were qualified
22 to prevent discrimination of any kind, including gender discrimination and religious
23 discrimination.
- 24 16. CAIR chose not to train its employees to prevent discrimination of any kind, including
25 gender discrimination and religious discrimination.
- 26 17. CAIR chose not to supervise its employees to prevent discrimination of any kind, including
27 gender discrimination and religious discrimination.
- 28 18. CAIR chose not to ensure its employees were qualified to prevent discrimination of any

1 kind, including gender discrimination and religious discrimination.

2 19. CAIR knew or should have known that it had a duty to train its employees to prevent
3 unlawful retaliation of any kind, including retaliation in violation of the Government Code.

4 20. CAIR knew or should have known that it had a duty to supervise its employees to prevent
5 unlawful retaliation of any kind, including retaliation in violation of the Government Code.

6 21. CAIR knew or should have known that it had a duty to ensure its employees were qualified
7 to prevent unlawful retaliation of any kind, including retaliation in violation of the
8 Government Code.

9 22. CAIR chose not to train its employees to prevent unlawful retaliation of any kind, including
10 retaliation in violation of the Government Code.

11 23. CAIR chose not to supervise its employees to prevent unlawful retaliation of any kind,
12 including retaliation in violation of the Government Code.

13 24. CAIR chose not to ensure its employees were qualified to prevent unlawful retaliation of
14 any kind, including retaliation in violation of the Government Code.

15 25. Plaintiff seeks compensatory damages, costs of suit herein, and attorney fees as a result of
16 the wrongdoing alleged herein.

17 26. Plaintiff filed a complaint with the California Department of Fair Employment and Housing
18 on January 29, 2020 and thereafter received a "Right to Sue" letter from the DFEH, which
19 is attached hereto as Exhibit "A."

20 **SPECIFIC FACTUAL ALLEGATIONS**

21 27. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
22 preceding paragraphs as though fully set forth herein.

23 28. CAIR is a nonprofit organization that focuses on improving and protecting Muslim-
24 American rights and relations in California. CAIR has offices in major cities throughout
25 California, including in San Diego.

26 29. In or around May 2017, CAIR hired Plaintiff as a Public Policy & Advocacy Coordinator
27 for the San Diego office ("CAIR San Diego"). As a Public Policy & Advocacy Coordinator,
28 Plaintiff was responsible for operating CAIR San Diego in every aspect outside of the legal

1 department and the accounting department. Plaintiff's duties and responsibilities included:
2 managing outreach, handling media communications, coordinating meetings at the local,
3 state, and federal levels, guiding and coordinating volunteers and interns, leading all policy
4 research, and managing all event planning and community meetings, among others.

5 30. Before CAIR hired Plaintiff, Plaintiff had significant experience in government and public
6 policy matters, including working as a policy coordinator for the United States Speaker of
7 the House Nancy Pelosi, fundraising for civil rights organizations, and working in
8 managerial positions to benefit refugee and immigrant communities.

9 31. Throughout her employment, Plaintiff performed her work in a competent and capable
10 manner, as recognized by CAIR. Plaintiff was a valuable employee for CAIR, in part due to
11 her extensive local community relationships, as well as her relationships within and
12 knowledge of the broader Muslim and social justice communities.

13 32. Plaintiff is female.

14 33. One of CAIR's purported core principles is "protecting the civil rights of all Americans,
15 regardless of faith" and supporting "freedom of religion."

16 34. On Plaintiff's information and belief, the majority of CAIR employees, including all of its
17 board members and the Executive Director of each office are Sunni Muslims. Sunni
18 Muslims represent the majority sect of Islam and practice more traditional Islamic principles
19 than other sects. Sunni principles require women to wear the hijab, a headscarf that covers
20 women's hair and neck.

21 35. Plaintiff is a Shia Muslim. Shia Muslims represent a minority sect of Islam. Shia Muslims
22 practice more progressive Islamic principles. Shia Muslim women are not required to wear
23 the hijab. Plaintiff chooses not to wear a hijab.

24 36. Plaintiff was the only Shia working in the CAIR San Diego office. The only other employee
25 in the San Diego office who was not a Sunni Muslim was Plaintiff's colleague, Susanne
26 Arani, who was not religious. Everyone else in the CAIR San Diego office was a Sunni
27 Muslim.

28 37. Not long after, Plaintiff began to notice that CAIR discriminated against females in the

1 workplace, including herself:

- 2 a. CAIR has a practice of paying female employees *substantially less* than male
3 employees. Several years before CAIR hired Plaintiff, CAIR conducted an internal
4 audit which revealed severe discrepancies in pay based on gender in every California
5 office. However, despite these findings, CAIR chose not to fix this pay discrepancy.
6 A few years after CAIR's internal audit, in 2017, an independent accounting audit
7 confirmed that CAIR continued its sizable pay disparity between male and female
8 employees. The independent audit further revealed that CAIR's male employees
9 generally supervised the female employees, and therefore the male supervisors were
10 the decisionmakers regarding pay.
- 11 b. When CAIR hired Plaintiff, the Executive Director at the time, Hanif Mohebi, who is
12 male, promised Plaintiff that if she successfully completed her initial 3-month
13 probationary period, CAIR would increase her wages from \$17.00/hour to
14 \$21.00/hour, and would provide medical insurance. Plaintiff excelled during her
15 initial 3-month probationary period, however CAIR did not increase her wages, nor
16 provide medical insurance, as promised. Plaintiff pleaded with Mohebi and CAIR,
17 who refused to honor the condition under which they hired Plaintiff. CAIR did not
18 increase Plaintiff's wages for approximately six months, only after Plaintiff
19 repeatedly implored Mohebi about her agreement with CAIR.
- 20 c. In or around April 2018, the Executive Director of the San Diego office left his
21 position. CAIR appointed an Interim Director while considering a replacement for
22 the Executive Director position. Both Plaintiff and another female employee, Arani,
23 who was then a Staff Attorney, were qualified for the Interim Director position.
24 CAIR did not consider either Plaintiff or Arani for the position. In or around July
25 2018, Arani asked the then Interim Director, Fahad Ahmad, why CAIR did not
26 consider either Plaintiff or Arani for the Interim Director position. Plaintiff was in
27 the room when Arani asked Ahmad why CAIR did not consider either woman for the
28 position. In response, Ahmad simply laughed at Arani and Plaintiff. Before CAIR

1 ultimately hired another Executive Director for the San Diego office, *five* male
2 employees or board members worked as Interim Director during the vacancy. *None*
3 of the male Interim Directors had experience in government or in politics equivalent
4 to Plaintiff's experience.

5 d. In or around December 2018, Plaintiff applied for the Executive Director position at
6 the San Diego office. Plaintiff was highly qualified for this position based on her
7 work at CAIR and her experience before CAIR. Despite Plaintiff's qualifications,
8 CAIR did not promote Plaintiff to the Executive Director position. CAIR did not
9 consider Plaintiff as a candidate for the Executive Director position. CAIR never
10 granted Plaintiff an interview, despite her obvious qualifications.

11 e. CAIR enforces a dress code that requires women to consider "modesty" when
12 dressing. "Modesty" is a religious term integral to Sunni principles that value
13 covering up a woman's body. CAIR's dress code prevents women from wearing
14 skirts, mid-length dresses, or sleeves shorter than $\frac{3}{4}$ length. CAIR does not enforce
15 an equivalent dress code for men. For example, CAIR does not prevent men from
16 wearing sleeves shorter than $\frac{3}{4}$ length.

17 f. In or around September 2018, in Plaintiff's presence, Arani asked the then Interim
18 Director, Saed Younis, about the modesty requirement in CAIR's dress code. The
19 Interim Director became agitated, and then lectured Plaintiff and Arani about his
20 belief that women should not be allowed to wear skirts and dresses because it would
21 not be modest, and would lead women to show more of their bodies. The Interim
22 Director expressed disgust as he described his old workplace, where women were not
23 as restrained by the dress code as they are at CAIR. On Plaintiff's information and
24 belief, CAIR still enforces its "modesty" dress code to women only.

25 g. In or around January 2019, CAIR hired Defendant Dustin Craun to work in the
26 Executive Director position. Unlike Plaintiff, Craun: 1) had never worked in an
27 office; 2) had never managed staff; 3) had never fundraised; 4) had not spent a
28 significant amount of time in San Diego; 5) did not have connections in in the

1 region; and 6) had no experience in advocacy, law, public policy or government.
2 Plaintiff was by all metrics more qualified for the Executive Director position than
3 Craun was. Craun is male.

4 h. CAIR allowed extreme exceptions for Craun, and did not allow these exceptions for
5 female employees. For example, CAIR required both Plaintiff and Arani to sign
6 releases allowing CAIR to conduct credit checks. However, CAIR did not impose
7 this requirement on Craun and did not conduct a credit check before offering him the
8 Executive Director position. CAIR made this exception for Craun despite the
9 sensitive nature of the Executive Director position, which grants access to private
10 financial information including donors' credit information.

11 38. In addition to discriminating against Plaintiff on the basis of her sex, CAIR also
12 discriminated against Plaintiff and other similarly situated employees on the basis of
13 religion:

- 14 a. Plaintiff, the only Shia employee in the San Diego office, was also the only
15 employee in the San Diego office to whom CAIR chose not to award a bonus for two
16 years.
- 17 b. In or around April 2018, after Hanif Mohebi, the Executive Director at the time
18 resigned, Fahad Ahmad, the CAIR San Diego Board Chair, promised that CAIR
19 would change Plaintiff's title, award her a pay raise, and transfer her from an hourly
20 to salary employee. Plaintiff believed CAIR was acknowledging the critical role
21 Plaintiff played and the additional work she would have to perform in the absence of
22 an Executive Director. However, CAIR did not deliver on its promise. Plaintiff
23 followed up repeatedly with Ahmad regarding his assurances. CAIR failed to
24 promote Plaintiff, and she remained an hourly employee until her constructive
25 termination, over a year after Ahmad told her CAIR would change her to a salaried
26 employee.
- 27 c. On or about October 23, 2018, the second Interim Director, Saed Younis, proclaimed
28 in a staff-meeting in front of Plaintiff and other employees who are not Sunni: "We

1 [CAIR] should not hire non-Muslims, they are bad for optics. I understand it has to
2 happen sometimes, but we should never allow a non-Muslim on our board,” or
3 similar words. On Plaintiff’s information and belief, Younis’ use of “non-Muslim”
4 referred to non-Sunni Muslims.

5 d. On October 27, 2018, a terrorist attack struck a synagogue in Pittsburgh,
6 Pennsylvania. Plaintiff expressed that she wanted to attend a vigil the following day
7 in honor of the victims. In response, the Interim Director at the time, Younis, told
8 Plaintiff not to attend because it would be a waste of her time, and exclaimed: “We
9 don’t need to be fake for those [Jewish] people.”

10 e. In or around November 2018, one of Plaintiff’s coworkers, Sondos Afifi, a Sunni
11 Muslim who wears a hijab, prepared to take the California Bar Exam. The Interim
12 Director at the time, Younis, announced in front of Plaintiff and Arani, that he would
13 pay Afifi upwards of \$10,000 out of his own pocket to study and take the Bar Exam,
14 however many times she needed to pass. At no point did Younis ever offer Plaintiff,
15 nor Arani, personal funds for any purpose. In fact, at no point during Plaintiff or
16 Arani’s tenure did any superior at CAIR offer either Plaintiff or Arani personal funds
17 for any reason. Plaintiff and Arani are not Sunni and neither wear the hijab.

18 f. On or about November 1, 2018, CAIR violated its own policies and unofficially
19 promoted Sondos Afifi to Deputy Executive Director, Operations Manager, and
20 Interim Executive Director in the San Diego office. According to CAIR’s employee
21 handbook, CAIR is required to offer new positions openly, so that qualified
22 employees can apply. Afifi is Sunni and wears the hijab. The Interim Director who
23 made the decision to promote Afifi, is also Sunni. Afifi was patently not qualified
24 for the Deputy Executive Director Position. She had no work or management
25 experience in the United States, no comparable experience for the position, and
26 lacked critical skills and education. For example, Afifi was not an attorney licensed
27 in California, yet in the Deputy Executive Director position she chose to supervise
28 Arani’s legal work, which is unethical under California State Bar Rules. Both

1 Plaintiff and Arani had greater experience and skills qualifying them for the Deputy
2 Executive Director position, and both were superior to Afifi before her promotion to
3 the Deputy Executive Director position.

4 39. In or around late October 2018, Plaintiff and Arani filed complaints with CAIR regarding its
5 discrimination towards them based on their sex and religion. In response, CAIR hired an
6 attorney to investigate the claims of discrimination, Elizabeth Riles. During her findings,
7 Riles determined that the Deputy Executive Director position should be open for application
8 in light of the violations CAIR made in unofficially offering it to Afifi.

9 40. In or around December 2018, Afifi resigned from the Deputy Executive Director position.
10 CAIR never considered either Plaintiff or Arani for the position, both before and after Afifi
11 worked as Deputy Executive Director. From December 2018 until Plaintiff's constructive
12 termination in May 2019, CAIR left the Deputy Executive Director position open, never
13 offering or opening it to application by Plaintiff. CAIR ignored Riles' recommendation that
14 CAIR open the position for applications.

15 41. In or around January 2019, CAIR hired Defendant Dustin Craun for the Executive Director
16 position at the San Diego office. Under Craun's direction, CAIR increased its
17 discrimination and harassment against Plaintiff and similarly situated employees based on
18 their sex and religion:

19 a. In or around February 2019, Craun told Plaintiff and Arani that CAIR's board told
20 him "these women [referring to Plaintiff and Arani] have been unmanaged for so
21 long that they might not be able to be managed," or words to that effect. Craun later
22 declared that he did not believe this statement was sexist. CAIR did not make any
23 statements about men being "unmanaged" or "unmanageable."

24 b. In or around early March 2019, Craun asked CAIR San Diego's bookkeeper, who is
25 male: "How do you deal with all these girls?" or similar words. Craun was referring
26 to the women who worked in the CAIR San Diego office, including Plaintiff. Craun
27 did not refer to the men worked for CAIR as "boys."

28 c. In or around November 2018, CAIR made a salary offer to Plaintiff, increasing her

1 wages and ostensibly finally fulfilling the promise Ahmad made approximately six
2 months prior. Plaintiff accepted the offer. However, despite Plaintiff's acceptance,
3 Craun refused to honor this agreement when he became Plaintiff's supervisor. When
4 Plaintiff complained to Craun, he angrily yelled: "Why the hell is that my
5 problem?!" or similar words to Plaintiff, in front of her coworkers.

- 6 d. Craun repeatedly asked Plaintiff to complete secretarial tasks that were not part of
7 her duties or responsibilities. For example, Craun asked Plaintiff to order him food,
8 and to fill out a spreadsheet for him. Craun did not ask any male subordinates to
9 complete secretarial tasks that were not part of their duties or responsibilities.
- 10 e. Craun referred to Arani and another female employee as "Chatty Cathys" to Plaintiff,
11 implying that they talked too much and were not doing their work. In reality, the
12 vast majority of employees' discussion were work related. Further, Plaintiff, Arani,
13 and the other female employee Craun accused of being a "Chatty Cathy" spent far
14 more time at work than did Craun, who frequently arrived to work late, left work
15 early, and took naps during the day. Craun *never* criticized male employees who had
16 non-work discussions in the office.
- 17 f. Craun tried to pit the women at CAIR San Diego against one another. Craun
18 frequently gossiped to Plaintiff about other women in the office in an effort to get
19 Plaintiff to agree with him, or to speak negatively about her coworkers. Plaintiff
20 refused to speak negatively or untruthfully about her coworkers, or to gossip with
21 Craun. Craun did not gossip to Plaintiff about male employees.
- 22 g. Craun repeatedly made disparaging remarks about women that he did not make
23 about men. He consistently cast doubt about female community leaders and
24 members with whom CAIR tried to work. Craun made statements about female
25 community members such as: "I don't trust her intentions". Craun expressed
26 suspicion towards female leaders and questioned their abilities. Craun did not
27 similarly express suspicion towards male leaders or question men's abilities.
- 28 h. Craun repeatedly threatened to fire female employees. Any time Plaintiff, or one of

1 her female peers challenged Craun, or disagreed with him, he called them
2 “unprofessional” and threatened to fire them because they were “disrespecting” his
3 authority. The only time Plaintiff, Arani or other female employees challenged
4 Craun was when he violated CAIR policies, acted unethically, or when he made
5 discriminatory or harassing statements. Craun did not threaten to fire male
6 employees.

- 7 i. Craun publicly took credit for Plaintiff’s work. At the CAIR-San Diego Gala on or
8 about December 8, 2019, Craun took the stage and gave a speech to the attendees,
9 taking credit for months of Plaintiff’s work. Craun said it was “my hard work and
10 visionary leadership that has guided us through the surveillance and targeting of our
11 community,” or words to that effect. At the time, Craun had only been the Executive
12 Director of CAIR San Diego for 11 months, and had done little for the “surveillance
13 and targeting” of the San Diego Muslim community. Privately, Craun thanked
14 Plaintiff for her work, and told her “if it wasn’t for you and all the great work you
15 were leading here in San Diego, I would never have known the importance of the
16 issues,” or words to that effect. Publicly, Craun did not credit Plaintiff for her work.
- 17 j. In or around March 2019, Craun offered a position to a male to assist in digital
18 marketing. However, digital marketing was a skill Craun claimed to have and that
19 he should have been able to perform in his position as Executive Director. Craun
20 offered the position to the digital marketer without posting a job announcement, in
21 violation of CAIR’s policies and procedures. Craun also offered to pay the male
22 digital marketer \$60.00/hour, over double Plaintiff’s and Arani’s hourly rate. The
23 wage offered to the male digital marketer was in gross discrepancy to Plaintiff’s and
24 Arani’s wages, considering their education, experience, and skills. Plaintiff and
25 Arani complained to Adib Mahdi, the president of CAIR’s San Diego Board about
26 Craun’s pay discrimination and other gender discrimination on or about March 14,
27 2019. The following day, Craun made negative comments about the women in his
28 office, including about Plaintiff:

1 i. Craun proclaimed: "Susanne [Arani] has a bad attitude and I don't give a damn
2 who she is, I will dismiss her." The reason why Craun claimed Arani had a
3 "bad attitude" is because she complained about gender discrimination.

4 ii. Referring to the women in the office, Craun stated: "This office is rotten to
5 the core," or similar words.

6 42. On or about March 19, 2019, Plaintiff reported Craun's discriminatory statements to CAIR's
7 upper-management, including to the head of personnel, the CAIR's CEO and the president
8 of CAIR's Board.

9 43. CAIR did nothing to reprimand Craun, or to prevent his discrimination and harassment from
10 recurring.

11 44. After Plaintiff complained of discrimination and harassment, CAIR—primarily through
12 Craun—retaliated against her:

13 a. CAIR took work assignments away from Plaintiff and minimized her duties,
14 restricting her to only marketing and fundraising.

15 b. Craun increased his angry outbursts and began yelling at Plaintiff more frequently in
16 the workplace, almost daily. On one occasion, there was a misunderstanding with
17 the CAIR Sacramento office that was not due to any fault or mistake by Plaintiff.
18 Craun screamed at Plaintiff in front of other employees that she "has to throw
19 Yannina Casillas [of the Sacramento office] under the bus, because it is either
20 [Plaintiff] or [Casillas]." Plaintiff calmly responded and asked that they "take a step
21 back and look at the situation" and that they should not have to throw anyone under a
22 bus for a mere misunderstanding. Craun refused and continued to scream at
23 Plaintiff.

24 c. During Craun's outbursts at Plaintiff, he repeatedly threatened to fire her, even
25 though she had not done anything wrong.

26 d. Craun repeatedly condescended Plaintiff's abilities, and openly questioned whether
27 she was qualified to perform tasks she had been performing for years.

28 e. Craun removed Plaintiff from a San Diego County WhatsApp group called "SD

1 Muslim Leaders” that was intended to connect local community leaders of Muslim
2 clubs, institutions, organizations, and other groups in San Diego. Plaintiff was a
3 valuable addition to the group, with all of her experience and connections. Being
4 part of the WhatsApp group would have better enabled Plaintiff to perform her work.
5 Plaintiff asked Craun why he removed her from the WhatsApp group. Craun
6 responded that Plaintiff was “not a community leader whatsoever,” and that she
7 “d[id] not belong to the group of main organizers,” or words to that effect. Plaintiff
8 had organized and fundraised several events for CAIR and other events for Muslim
9 groups that had upwards of 500 attendees. Unlike Plaintiff, Craun had no media
10 contacts, no civil rights advocates contacts, or other helpful contacts. Plaintiff was
11 more qualified than Craun to be part of the WhatsApp group.

- 12 f. In or around early April 2019, Craun cancelled Plaintiff’s planned attendance at a
13 national convention in Washington D.C., the United States Council of Muslim
14 Organizations (UCSMO). Plaintiff had diligently prepared for the trip, and had
15 scheduled meetings to promote CAIR’s efforts. All other CAIR Advocacy & Policy
16 Coordinators in California were permitted to attend. Craun dangled the possibility of
17 Plaintiff attending the UCSMO convention by questioning if she deserved to attend.
18 Plaintiff had worked extremely hard to prepare for the convention and deserved to
19 attend. Approximately one day before the convention began, Craun changed his
20 mind and granted Plaintiff permission to attend the convention. This forced Plaintiff
21 to book a last-minute flight, which caused her to be late to the first day of the
22 convention. The delay cost Plaintiff valuable time lobbying, and impeded her ability
23 to do her job.
- 24 g. Craun refused to reimburse Plaintiff for work trips. On one occasion, at the end of
25 April 2019, Plaintiff was scheduled to travel to Detroit, Michigan for a Countering
26 Violent Extremism Convention. Plaintiff had been preparing for the convention for
27 over eight months. Craun told Plaintiff CAIR would not reimburse her for travel or
28 lodging, or for her work during the convention, telling Plaintiff “it isn’t part of your

1 job and is unnecessary,” or similar words.

2 h. Craun tried to steal Plaintiff’s contacts from her. Craun demanded that Plaintiff
3 share her contacts with him. Plaintiff had spent twenty years before her position at
4 CAIR building her contacts, which made her extremely valuable to CAIR. In or
5 around late April 2019, Craun threatened Plaintiff, telling her: “CAIR owns all of
6 your contacts, and you’re not entitled to keep them,” or words to that effect. Plaintiff
7 refused to share her contacts with Craun because they did not belong to him or to
8 CAIR.

9 45. On or about April 9, 2019, CAIR terminated Arani. Craun then threatened Plaintiff, telling
10 her she would be disciplined if she told anyone that CAIR San Diego did not have an
11 attorney in-house.

12 46. After CAIR fired Arani, CAIR began scrutinizing Plaintiff’s work to an even greater degree:

- 13 a. CAIR began to monitor Plaintiff’s texts and limit her contact within the organization.
- 14 b. Craun told Plaintiff she was not permitted to talk or meet with anyone on the Board.
- 15 c. Craun instructed Plaintiff to stop interacting with her community contacts, otherwise
16 she would be disciplined.
- 17 d. Craun continued to threaten to terminate Plaintiff for no discernible reason.

18 47. As Defendants’ discrimination, harassment, and retaliation increased, Plaintiff’s health
19 deteriorated. Plaintiff lost sleep, became depressed, and suffered bouts of severe anxiety.
20 Plaintiff’s symptoms became so severe, she began to suffer panic attack that she was forced
21 to make emergency visits to the psychiatric unit of her health care provider.

22 48. Plaintiff did not feel safe around Craun. In or around January 2019, the security cameras at
23 the office broke-down. CAIR San Diego receives frequent death threats, and is stalked by
24 white supremacist groups. Plaintiff and her coworkers repeatedly asked Craun to repair the
25 security cameras. For several weeks, Craun ignored Plaintiff’s requests. On March 15,
26 2019, a terrorist attack in New Zealand targeted a mosque, which killed 51 people. After the
27 attack, Plaintiff increased her requests that Craun repair or replace the security cameras.
28 Craun consistently ignored Plaintiff’s requests, despite Plaintiff’s reasonable fear for her

1 safety.

2 49. On or about March 18, 2019, Plaintiff complained to CAIR's human resources that she did
3 not feel safe in Craun's presence, and that Craun was targeting Plaintiff and acting paranoid,
4 angry, and unstable around her. Furthermore, Plaintiff reported that Craun ignored and
5 dismissed her safety concerns when she reported them.

6 50. CAIR did nothing to respond to Plaintiff's complaints about her safety.

7 51. By April 2019, Plaintiff no longer felt safe at work, and believed CAIR would not prevent
8 Craun from harming her, or would otherwise protect her. Plaintiff had no choice but to issue
9 her two-weeks' notice in mid-April 2019. Plaintiff's last day was May 1, 2019.

10 52. CAIR constructively terminated Plaintiff on May 1, 2019 because of her sex, her religion,
11 and in retaliation for her complaints of discrimination and harassment.

12 **FIRST CAUSE OF ACTION**

13 **GENDER DISCRIMINATION**

14 **Against Defendant CAIR**

15 **[Cal. Gov't Code §12940(a)]**

16 53. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
17 preceding paragraphs as though fully set forth herein.

18 54. At all times mentioned herein, Cal. Gov't Code §12940(a) was in full force and effect and
19 was binding on Defendant. This section requires Defendant, as an employer, to refrain from
20 discriminating against any employee on the basis of gender.

21 55. Plaintiff believes and thereon alleges that her female gender, was a motivating factor in
22 Defendant's discrimination against her, including its failure to promote her, and its
23 constructive termination of her employment, as set forth herein. Such actions are in
24 violation of Cal. Gov't Code §12940(a), and have resulted in damage and injury to Plaintiff,
25 as alleged herein.

26 56. As a direct, foreseeable, and proximate result of Defendant's conduct, Plaintiff has sustained
27 and continues to sustain substantial losses in reputation, promotions, and other employment
28 opportunities.

1 57. As a result of Defendant's deliberate, outrageous, and despicable conduct, Plaintiff is
2 entitled to recover punitive and exemplary damages in an amount commensurate with each
3 of Defendant's wrongful acts and sufficient to punish and deter future similar reprehensible
4 conduct.

5 58. Plaintiff has incurred and continues to incur legal expenses and attorney fees.

6 **SECOND CAUSE OF ACTION**

7 **RELIGIOUS DISCRIMINATION**

8 **Against Defendant CAIR**

9 **[Cal. Gov't Code §12940(a)]**

10 59. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
11 preceding paragraphs as though fully set forth herein.

12 60. At all times mentioned herein, Cal. Gov't Code §12940(a) was in full force and effect and
13 was binding on Defendant. This section requires Defendant, as an employer, to refrain from
14 discriminating against any employee on the basis of their religion.

15 61. Plaintiff believes and thereon alleges that her religion was a motivating factor in
16 Defendant's discrimination against her, including its failure to promote her, and its
17 constructive termination of her employment, as set forth herein. Such actions are in
18 violation of Cal. Gov't Code §12940(a), and have resulted in damage and injury to Plaintiff,
19 as alleged herein.

20 62. As a direct, foreseeable, and proximate result of Defendant's conduct, Plaintiff has sustained
21 and continues to sustain substantial losses in reputation, promotions, and other employment
22 opportunities.

23 63. As a result of Defendant's deliberate, outrageous, and despicable conduct, Plaintiff is
24 entitled to recover punitive and exemplary damages in an amount commensurate with each
25 of Defendant's wrongful acts and sufficient to punish and deter future similar reprehensible
26 conduct.

27 64. Plaintiff has incurred and continues to incur legal expenses and attorney fees.

28 ///

1 **THIRD CAUSE OF ACTION**

2 **RETALIATION**

3 **Against Defendant CAIR**

4 **(Cal. Gov't Code §12940(h))**

5 65. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
6 preceding paragraphs as though fully set forth herein.

7 66. At all times mentioned herein, Cal. Gov't Code §12940(h) was in full force and effect and
8 was binding on Defendant. This section requires Defendant, as an employer, to refrain from
9 retaliating against any employee who has opposed any practices forbidden under Cal. Gov't
10 Code §12940, or because the employee has filed a complaint, testified, or assisted in any
11 proceeding under Cal. Gov't Code §12940.

12 67. Plaintiff believes and thereon alleges that his opposition to Defendant's discriminatory and
13 harassing conduct was a motivating factor in Defendant's discrimination against him, as set
14 forth herein. Such actions are in violation of Cal. Gov't Code §12940(h), and have resulted
15 in damage and injury to Plaintiff, as alleged herein.

16 68. Plaintiff repeatedly reported to CAIR the gender discrimination and religious discrimination
17 she experienced and witnessed. In retaliation for her complaints, CAIR reprimanded
18 Plaintiff, restricted her duties and responsibilities, and constructively terminated Plaintiff's
19 employment.

20 69. As a proximate result of Defendant's actions against Plaintiff, as alleged herein, Plaintiff has
21 been harmed in that Plaintiff has suffered the loss of bonuses, promotions, and other
22 employment benefits. As a result of such conduct and consequent harm, Plaintiff has
23 suffered damages in an amount to be shown according to proof at trial.

24 70. Defendant's acts were malicious as detailed above entitling Plaintiff to all damages,
25 including, but not limited to attorney's fees.

26 ///

27 ///

28 ///

1 **FOURTH CAUSE OF ACTION**

2 **HARASSMENT- HOSTILE WORK ENVIRONMENT**

3 **Against All Defendants**

4 **[Cal. Gov't. Code §12940(j)]**

5 71. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
6 preceding paragraphs as though fully set forth herein.

7 72. At all times mentioned herein, Cal. Gov't Code §12940(h) was in full force and effect and
8 was binding on Defendants. This section requires Defendants, as employers, to refrain from
9 harassing an employee on the basis of her sex and on the basis of her religion.

10 73. Defendants repeatedly harassed Plaintiff on the basis of her sex and on the basis of her
11 religion creating a hostile work environment, as alleged herein. Defendant Craun, Plaintiff's
12 supervisor, harassed and demeaned Plaintiff because of her gender and because of her
13 religion. Craun frequently yelled at Plaintiff, asked her to complete menial tasks, insulted
14 Plaintiff, and otherwise demeaned Plaintiff because of her gender and because of her
15 religion. Defendant CAIR knew or should have known of Craun's harassment, yet failed to
16 take immediate and appropriate corrective action, as alleged herein. Such actions are in
17 violation of Cal. Gov't Code §12940(j), and have resulted in damage and injury to Plaintiff,
18 as alleged herein

19 74. As a direct, foreseeable, and proximate result of Defendant's conduct, Plaintiff has sustained
20 and continues to sustain substantial losses in earnings, employment benefits, employment
21 opportunities, and Plaintiff has suffered other economic losses in an amount to be
22 determined at time of trial. Plaintiff has sought to mitigate these damages.

23 75. As a further direct, foreseeable, and proximate result of Defendant's conduct, Plaintiff has
24 suffered and continues to suffer humiliation, emotional distress, loss of reputation, and
25 mental and physical pain and anguish, all to her damage in a sum to be established according
26 to proof.

27 76. As a result of Defendant's deliberate, outrageous, despicable conduct, Plaintiff is entitled to
28 recover punitive and exemplary damages in an amount commensurate with Defendant's

1 wrongful acts and sufficient to punish and deter future similar reprehensible conduct.

2 **FIFTH CAUSE OF ACTION**

3 **FAILURE TO PREVENT DISCRIMINATION AND HARASSMENT**

4 **Against Defendant CAIR**

5 **[Cal. Gov't Code § 12940(k)]**

6 77. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
7 preceding paragraphs as though fully set forth herein.

8 78. Plaintiff was subject to discrimination and harassment on the basis of her sex, and Plaintiff
9 was subject to discrimination and harassment on the basis of her religion, as set forth herein.

10 79. Defendants failed to take reasonable steps to prevent the discrimination as described herein.

11 80. Plaintiff has sustained and continues to sustain substantial losses in earnings, employment
12 benefits, employment opportunities, and Plaintiff has suffered other economic losses in an
13 amount to be determined at time of trial. Plaintiff has sought to mitigate these damages.

14 81. As a further direct, foreseeable, and proximate result of Defendants' conduct, Plaintiff has
15 suffered and continues to suffer humiliation, emotional distress, loss of reputation, and
16 mental and physical pain and anguish, all to her damage in a sum to be established according
17 to proof.

18 82. As a result of Defendants' deliberate, outrageous, despicable conduct, Plaintiff is entitled to
19 recover punitive and exemplary damages in an amount commensurate with Defendants'
20 wrongful acts and sufficient to punish and deter future similar reprehensible conduct.

21 83. In addition to such other damages as may properly be recovered herein, Plaintiff is entitled
22 to recover prevailing party attorney fees and costs pursuant to Cal. Gov't Code §12965.

23 **SIXTH CAUSE OF ACTION**

24 **WRONGFUL CONSTRUCTIVE TERMINATION IN VIOLATION OF PUBLIC POLICY**

25 **(Cal. Gov't Code §12940 *et seq.*)**

26 **Against Defendant CAIR**

27 84. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
28 preceding paragraphs as though fully set forth herein.

- 1 85. When an employer's discharge of an employee violates fundamental principles of public
2 policy, the discharged employee may maintain a tort action and recover damages
3 traditionally available in such actions. *Tameny v. Atlantic Richfield Co.* (1980) 27 Cal.3d
4 167, 170.
- 5 86. California Government Code §12940 (a) prohibits employers from discriminating against
6 any employee on the basis of gender and/or on the basis of religion.
- 7 87. California Government Code §12940(h) makes it unlawful for employers to retaliate against
8 any employee who has opposed any practices forbidden under Cal. Gov't Code §12940, or
9 because the employee has filed a complaint, testified, or assisted in any proceeding under
10 Cal. Gov't Code §12940.
- 11 88. Plaintiff is a Shia Muslim female.
- 12 89. Defendant discriminated against Plaintiff because of her sex and because of her religion.
- 13 90. Plaintiff complained of and opposed Defendant's discrimination of herself and others.
- 14 91. Defendant constructively terminated Plaintiff's employment.
- 15 92. Plaintiff's sex, religion, and opposition of Defendant's discrimination were each a
16 substantial motivating factor in Defendant's decision to constructively terminate Plaintiff's
17 employment, or otherwise discriminate against her in the terms and conditions of her
18 employment.
- 19 93. As a direct, foreseeable, and proximate result of Defendant's conduct, Plaintiff has sustained
20 and continues to sustain substantial losses in earnings, employment benefits, employment
21 opportunities, and Plaintiff has suffered other economic losses in an amount to be
22 determined at time of trial. Plaintiff has sought to mitigate these damages.
- 23 94. As a direct, foreseeable, and proximate result of Defendant's conduct, Plaintiff has suffered
24 and continues to suffer humiliation, emotional distress, loss of reputation, and mental and
25 physical pain and anguish, all to her damage in a sum to be established according to proof.
- 26 95. As a result of Defendants' deliberate, outrageous, despicable conduct, Plaintiff is entitled to
27 recover punitive and exemplary damages in an amount commensurate with Defendants'
28 wrongful acts and sufficient to punish and deter future similar reprehensible conduct, as well

1 as attorneys' fees pursuant to California Code of Civil Procedure section 1021.5.

2 **SEVENTH CAUSE OF ACTION**

3 **NEGLIGENT SUPERVISION**

4 **Against Defendant CAIR**

5 96. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
6 preceding paragraphs as though fully set forth herein.

7 97. Plaintiff performed work for Defendant as an employee, as stated herein.

8 98. Defendant's supervisors discriminated against Plaintiff due to her gender and due to her
9 religion in violation of Cal. Gov't Code §12940(a). Defendant's supervisor Craun harassed
10 Plaintiff due to her gender and due to her religion in violation of Cal. Gov't Code §12940(j).

11 99. Defendant knew or should have known that this conduct was unlawful and in violation of
12 the Government Code.

13 100. Defendant failed to take steps necessary to prevent the unlawful conduct described herein.

14 101. As a direct, foreseeable, and proximate result of Defendant' conduct, Plaintiff has sustained
15 and continues to sustain substantial losses in earnings, employment benefits, employment
16 opportunities, and Plaintiff has suffered other economic losses in an amount to be
17 determined at time of trial. Plaintiff has sought to mitigate these damages.

18 102. As a direct, foreseeable, and proximate result of Defendant' conduct, Plaintiff has suffered
19 and continues to suffer humiliation, emotional distress, loss of reputation, and mental and
20 physical pain and anguish, all to her damage in a sum to be established according to proof.

21 **EIGHTH CAUSE OF ACTION**

22 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

23 **Against All Defendants**

24 103. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the
25 preceding paragraphs as though fully set forth herein.

26 104. Defendants' intentional conduct, as set forth herein, was extreme and
27 outrageous. Defendants intended to cause Plaintiff to suffer extreme emotional
28 distress. Plaintiff did suffer extreme emotional distress.

1 105. As a direct, foreseeable, and proximate result of Defendants' conduct, Plaintiff has sustained
2 and continues to sustain substantial losses in reputation, promotions, and other employment
3 opportunities.

4 106. As a direct, foreseeable, and proximate result of Defendants' conduct, Plaintiff has suffered
5 and continues to suffer humiliation, emotional distress, loss of reputation, and mental and
6 physical pain and anguish, all to her damage in a sum to be established according to proof.
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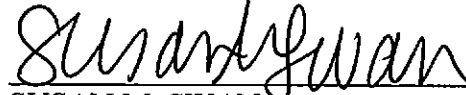
8 **WHEREFORE**, Plaintiff prays for the following relief:

- 9 1. For compensatory damages, including back pay, front pay, promotional
10 opportunities, benefits, and other opportunities of employment, according to proof;
- 11 2. For special damages in an amount according to proof;
- 12 3. For mental and emotional distress damages;
- 13 4. For civil penalties;
- 14 5. For costs of suit, including attorney fees as permitted by law, including those
15 available pursuant to California Code of Civil Procedure §1021.5, and California
16 Government Code §12965.
- 17 6. For an award of interest, including prejudgment interest, at the legal rate as permitted
18 by law;
- 19 7. For injunctive relief, including reinstatement, retroactive promotions, and retroactive
20 seniority;
- 21 8. For such other and further relief as the Court deems proper and just under all the
22 circumstances.
23

24 **PLAINTIFF MEJGAN AFSHAN** demands a jury trial on all issues in this case.

25 DATED: February 9, 2021,

SWAN EMPLOYMENT LAW



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SUSAN M. SWAN
LAURA M. KELLEHER
Attorneys for Plaintiff,
MEJGAN AFSHAN

**EXHIBIT A:
MEJGAN AFSHAN'S DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING COMPLAINT AND RIGHT TO SUE LETTER**

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DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

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

January 29, 2020

Laura Kelleher
402 W. Broadway, Ste. 1120
San Diego, California 92101

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 202001-09073529
Right to Sue: Afshan / Council on American-Islamic Relations, California et al.

Dear Laura Kelleher:

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



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

January 29, 2020

RE: Notice of Filing of Discrimination Complaint
DFEH Matter Number: 202001-09073529
Right to Sue: Afshan / Council on American-Islamic Relations, California et al.

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

January 29, 2020

Mejgan Afshan
402 W Broadway, Ste. 1120
San Diego, California 92101

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 202001-09073529
Right to Sue: Afshan / Council on American-Islamic Relations, California et al.

Dear Mejgan Afshan,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective January 29, 2020 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

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 **Mejgan Afshan**

DFEH No. 202001-09073529

8 **Complainant,**

9 **vs.**

10 **Council on American-Islamic Relations, California**
11 **2180 W CRESCENT AVE STE F**
12 **Anaheim, California 92801**

13 **Dustin Craun**
14 **2180 W CRESCENT AVE STE F**
15 **Anaheim, California 92801**

16 **Respondents**

17 **1. Respondent Council on American-Islamic Relations, California is an**
18 **employer subject to suit under the California Fair Employment and Housing Act**
19 **(FEHA) (Gov. Code, § 12900 et seq.).**

20 **2. Complainant Mejgan Afshan, resides in the City of San Diego State of**
21 **California.**

22 **3. Complainant alleges that on or about May 1, 2019, respondent took the following**
23 **adverse actions:**

24 **Complainant was harassed** because of complainant's religious creed - includes
25 **dress and grooming practices, sex/gender.**

26 **Complainant was discriminated against** because of complainant's religious creed
27 **- includes dress and grooming practices, sex/gender and as a result of the**
28 **discrimination was forced to quit, denied hire or promotion, reprimanded, denied**
equal pay, denied any employment benefit or privilege, denied work opportunities or
assignments.

1 **Complainant experienced retaliation** because complainant reported or resisted
2 any form of discrimination or harassment and as a result was forced to quit, denied
3 hire or promotion, reprimanded, denied equal pay, denied any employment benefit
4 or privilege.

4 **Additional Complaint Details:** Respondents repeatedly discriminated against and
5 harassed Complainant on the basis of her sex and her religion. Respondents paid
6 Complainant less, denied her a promotion, to work assignments away from her, set
7 her up to fail, and ultimately forced her to quit. Respondents' motivation for these
8 acts was Complainant's sex, female, and religion, Shia Muslim. Respondents
9 reprimanded and set Complainant up to fail when she reported sexist and
10 discriminatory comments and conduct. Respondent Craun harassed Complainant
11 on the basis of her sex and her religion to the point that Respondents gave
12 Complainant no choice but to quit. Complainant has suffered and continues to suffer
13 substantial economic and emotional damages due to Respondents' conduct.
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1 VERIFICATION

2 I, **Laura Kelleher**, 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 January 29, 2020, 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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San Diego, CA