

1 Mike Arias (SBN: 115385)
2 Sahar Malek (SBN: 283863)
3 Nia D. Gamble (SBN: 346394)
4 **ARIAS SANGUINETTI WANG & TEAM LLP**
5 6701 Center Drive West, Suite 1400
6 Los Angeles, California 90045
7 Telephone: (310) 844-9696
8 Facsimile: (310) 861-0168
9 Email: LAService@aswtlawyers.com
10 Email: SILTeam@aswtlawyers.com
11

12 V. Jim DeSimone (SBN: 119668)
13 **V. JAMES DESIMONE LAW**
14 4052 Del Rey Ave. Suite 102
15 Marina Del Rey CA 90292
16 Telephone: (310) 693-5561
17 Email: all@vjdlaw.com
18

19 Attorneys for Plaintiff
20 JANE DOE
21

22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
23 **FOR THE COUNTY OF KERN**
24

25 JANE DOE, an individual;
26

27 Plaintiff,
28

v.

29 CESAR CHAVEZ FOUNDATION, a
30 California nonprofit corporation; UFW
31 FOUNDATION, a California nonprofit
32 corporation; and DOES 1 through 50,
33 inclusive,
34

35 Defendants.
36
37
38

CASE NO.: 26CUB03446

COMPLAINT FOR DAMAGES FOR:

1. NEGLIGENCE;
2. NEGLIGENT SUPERVISION;
3. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS;
4. SEXUAL HARASSMENT;
5. VIOLATION OF BANE ACT;
6. VIOLATION OF UNRUH ACT

DEMAND FOR JURY TRIAL

1 **NOTICE TO DEFENDANTS OF DUTIES TO RETAIN EVIDENCE:**

2 TO ALL DEFENDANTS: Note and adhere to your duties to retain, and not delete or
3 destroy, all documents, emails, databases, electronic records, electronically stored information,
4 and all other evidence that may be pertinent to this lawsuit, and to cease any destruction or deletion
5 of such evidence that might otherwise take place in the ordinary course of your business or affairs.

6 **COMES NOW**, Plaintiff JANE DOE (hereinafter “Plaintiff”), who hereby brings
7 this Complaint for Damages against CESAR CHAVEZ FOUNDATION, UFW
8 FOUNDATION, and DOES 1–50.

9 Plaintiff JANE DOE brings this action pursuant to Cal. Code of Civil Procedure
10 § 340.16(e).

11 **PARTIES**

12 1. Plaintiff JANE DOE is an adult woman born in 1940. She is currently a
13 resident of San Bernardino County. The name used by Plaintiff in this complaint is a
14 fictitious name used to protect her identity as a survivor of sexual assault.

15 2. Defendant CESAR CHAVEZ FOUNDATION is a California nonprofit
16 corporation with its principal place of business in Kern County, California. The CESAR
17 CHAVEZ FOUNDATION is the successor organization of the National Farm Workers
18 Service Center, Inc. Upon its founding in 1966, Cesar Chavez was on the Board of Directors.
19 Upon information and belief, the CESAR CHAVEZ FOUNDATION has title to the land and
20 property at the National Chavez Center located at La Paz.

21 3. Defendant UFW FOUNDATION is a California nonprofit corporation with its
22 principal place of business in Kern County, California. UFW FOUNDATION is the
23 successor organization to the National Farm Workers Health Group, which among many
24 purposes, was responsible for organizing farm workers and conducting information activities.
25 Upon its founding in 1971, Cesar Chavez was one of three named directors of the National
26 Farm Workers Health Group.

27 4. Cesar Chavez was a labor unionist and political activist. In 1962, Chavez co-
28 founded several labor organizations, culminating in the establishment of the United Farm

1 Workers (UFW) in 1972. Chavez served as the figurehead until his death in 1993. Chavez
2 is deceased and is, therefore, not a named Defendant.

3 5. Defendants DOES 1–50, inclusive, and each of them, are sued herein under
4 said fictitious names. Plaintiff is ignorant as to the true names and capacities of DOES 1–
5 50, whether individual, corporate, associate, or otherwise, and therefore sues said Defendants
6 by such fictitious names. Each such Doe Defendant is legally responsible in some manner
7 for the events, happenings, and/or tortious and unlawful conduct that caused the injuries and
8 damages alleged in this Complaint. When their true names and capacities are ascertained,
9 Plaintiff will amend the Complaint to show the true names and capacities of each such Doe
10 Defendant.

11 6. At all times mentioned herein, each and every of the Defendants herein was
12 the agent, ostensible agent, licensee, servant, partner, joint venturer, employer, employee,
13 assistant, or volunteer of each of the other Defendants, and each was at all times alleged
14 herein in the course and scope of said agency, ostensible agency, license, service, partnership,
15 joint venture, employment, assistance, and volunteering.

16 7. Plaintiff is informed and believes, and on that basis alleges, that at all times
17 mentioned herein, there existed a unity of interest and ownership among CESAR CHAVEZ
18 FOUNDATION, UFW FOUNDATION, and DOES 1 – 50.

19 **JURISDICTION AND VENUE**

20 8. Plaintiff seeks relief under California law, and the amount in controversy exceeds this
21 Court’s jurisdictional minimum.

22 9. Venue is proper in Kern County because a substantial part of the acts or omissions
23 that give rise to Plaintiff’s claims occurred in or near Kern County, California.

24 **STATUTE OF LIMITATIONS**

25 10. This is a claim made pursuant to *Code of Civil Procedure* §340.16(e) as amended by
26 Assembly Bill 250, effective January 1, 2026.

GENERAL ALLEGATIONS

11. The farm worker movement began to take shape in the 1960s in California, following the end of the exploitative Bracero Program by the U.S. government. The farm worker movement took form to challenge the grueling conditions the braceros had endured. The movement, co-led by Chavez, organized workers to demand better pay and working conditions on farms.
12. Upon information and belief, Chavez was, at all relevant times, an employee and/or agent of CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–25.
13. Plaintiff was a college student in the late 1950s and early 1960s. During a summer between school years, she worked in fruit sheds in Northern California where she was exposed to the treatment of farm workers. Soon thereafter, she began volunteering with student groups who supported the organizing efforts in the Central Valley.
14. Following college, Plaintiff moved to the Central Valley to support the grape strike organized by the farm worker movement. Through this work, Plaintiff met Chavez.
15. Plaintiff worked in various support roles for the UFW through 1983.
16. For much of the twentieth and twenty-first century, Chavez has been a folk saint among Mexican Americans and a revered icon. Chavez’s birthday was proclaimed a federal commemorative holiday in 2014 and a state holiday in multiple states. Numerous streets, schools, and other facilities throughout the United States are named after Chavez. In 1994, President Bill Clinton posthumously awarded the Presidential Medal of Freedom to Chavez.
17. Within the UFW, however, Chavez was known for his autocratic tendencies and frequent purges of employees he unilaterally deemed disloyal. A cult of personality developed around Chavez.
18. In 1970, the farm worker movement acquired a former tuberculosis sanatorium in Keene, in the foothills of the Tehachapi Mountains. The movement developed the compound to serve as its headquarters and the official office and residence for Chavez. The compound hosted thousands of organizers for training and strategizing. The compound was called

1 Nuestra Señora Reina De La Paz, and colloquially, “La Paz.”

2 19. In addition to UFW administrative offices, the compound at La Paz also included housing
3 for approximately 200 UFW organizers and their families. Eventually, the union
4 newspaper (*El Malcriado*), a children’s school, a radio station, and other activities
5 operated out of La Paz. Beginning in the spring of 1970~~3~~, Plaintiff and her family were
6 among the residents at La Paz.

7 20. In 2011, La Paz was listed on the National Register of Historic Places and in 2012, was
8 designated a national monument by President Obama. La Paz serves as the burial site for
9 Chavez and his wife Helen Chavez.

10 21. Upon information and belief, beginning in or around 1971, Chavez employed security
11 detail and bodyguards to accompany him at all times.

12 22. In spring 1973, Plaintiff attended a celebration at La Paz. At the party, Chavez pushed
13 alcohol on Plaintiff and danced with Plaintiff. Plaintiff felt uncomfortable and went into
14 a bathroom to hide for a while.

15 23. Shortly thereafter, upon returning and entering her house, Chavez summoned Plaintiff to
16 a room within her house. Inside the room, Chavez pulled ~~threw~~ Plaintiff onto the bed and
17 raped her.

18 24. In or around 1976 or 1977, Chavez called Plaintiff over to his house at La Paz. Chavez
19 forcibly pulled Plaintiff’s head down to his crotch, where he had an erect penis.

20 25. Upon information and belief, Plaintiff was not the first to endure sexual abuse by Cesar
21 Chavez nor was she the last.

22 26. After the assault, Plaintiff actively avoided interactions with Chavez as best as possible
23 and reserved interactions with him to board meetings or other situations in which
24 interaction was unavoidable. Employees and others there within UFW were aware of the
25 abuse but failed to respond to this knowledge in any manner. Instead, despite this
26 knowledge, the UFW employees ensured that any abuse was done in closed quarters,
27 outside of visibility of others.

28 27. On March 18, 2026, *The New York Times* published an investigation, uncovering Chavez’s

decades-long grooming and sexual abuse of girls and women who worked in the farm worker movement. The article reported that Chavez's relatives and former UFW leaders had been aware of various allegations of sexual misconduct for years, but made no efforts to investigate the allegations, acknowledge the victims, report to abuse to authorities, or halt the abuse from continuing.

28. On June 12, 2026, *The New York Times* published a follow-up article, detailing the harassment, misogyny, and sexual assault women within the UFW movement faced by men in the movement. As reported, in the late 1970s, several women organizers formed a women's safety group to discuss safety and the second-class status of women in the union. The women in the group were verbally attacked by several of Mr. Chavez's top lieutenants, accused of trying to ruin the movement. As reported, a number of women complained to union leaders, but were rebuffed.

29. Upon information and belief, CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1-50 made concerted efforts to hide evidence relating to sexual harassment and sexual assaults of girls and women by UFW members and leaders, including Cesar Chavez, in an effort to incentivize survivors to remain silent or prevent information relating to such wrongdoing from becoming public.

30. Due to the sexual assaults by Chavez, Plaintiff has and continues to suffer from depression, anger, humiliation, emotional distress, despondency, suicidal thoughts, alcohol dependency, weight gain, and diminished sexual relations with her spouse. Plaintiff requires ongoing therapy to cope with the trauma of the assaults.

31. The sexual assaults committed by Chavez at La Paz continue to cause emotional distress for Plaintiff.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

NEGLIGENCE

(Against all Defendants)

- 1 32. Plaintiff re-alleges and incorporates by reference herein each and every allegation
2 contained above as though fully set forth and brought in this cause of action.
- 3 33. Plaintiff relied on Defendants CESAR CHAVEZ FOUNDATION, UFW
4 FOUNDATION, and DOES 1–50 to properly supervise its employees, including its
5 leaders, and ensure a safe environment at La Paz. Defendants failed to use reasonable
6 care, exhibiting an extreme deviation from the standard of care, which resulted in
7 violations of Plaintiff’s body, mind and person. This negligence was a substantial factor
8 in causing harm to Plaintiff.
- 9 34. Defendants CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–
10 50 undertook the responsibility to manage and oversee the treatment of its employees,
11 volunteers, their families, and anyone else invited onto the property at La Paz and
12 Defendants had special duties to protect Plaintiff from foreseeable and unnecessary harm.
- 13 35. Defendants negligently and tortiously failed to exercise the degree of knowledge and skill
14 ordinarily possessed and exercised by a labor organization and operator of a large
15 compound and operation. Specifically, Defendants unlawfully and negligently failed to
16 properly train its staff, including senior leaders, to not harass, assault or abuse girls and
17 women, including girls and women who are part of the labor movement. Defendants also
18 failed to train security and/or bodyguards to intervene when a tortious conduct is
19 occurring. Instead, Defendants engaged in covering up previous instances of sexual assault
20 and abuse by Chavez.
- 21 36. Defendants were aware, or should have been aware, of Chavez’s sexual misconduct and
22 predatory tendencies. Defendants breached their duties to Plaintiff by failing to
23 adequately monitor and supervise Chavez and by failing to prevent Chavez from
24 continuing to commit sexually abusive acts against Plaintiff.
- 25 37. Defendants further breached their duties by failing to create, implement and enforce
26 policies, procedures and/or standards of practice so as to prevent the abuse to women,
27 including Plaintiff.
- 28 38. As a direct and proximate result of Defendants’ wrongful conduct, individually, jointly

1 and/or severally, Plaintiff sustained, and continues to experience, severe emotional
2 distress, pain, emotional anguish, fear, anxiety, humiliation and other physical and
3 emotional injuries, damages (both economic and non-economic) and permanent disability,
4 in the past, present and future, for which this claim is made. The injuries suffered by
5 Plaintiff are substantial, continuing and permanent, in an amount to be proven at trial.

6 **SECOND CAUSE OF ACTION**

7 **NEGLIGENT SUPERVISION**

8 **(Against all Defendants)**

9 39. Plaintiff re-alleges and incorporates by reference herein each and every allegation
10 contained herein above as though fully set forth and brought in this cause of action.

11 40. Defendants owed Plaintiff a duty to provide reasonable supervision of Chavez, to use
12 reasonable care in investigating Chavez's actions and serial misconduct, and to provide
13 adequate warnings to Plaintiff of Chavez's dangerous propensities and unfitness. As an
14 organization responsible for the welfare of its members, including Plaintiff, Defendants
15 had a duty to protect, supervise, and monitor Plaintiff from being preyed upon by sexual
16 predators and to supervise and monitor Chavez such that he would not be placed in
17 seclusion with members, including Plaintiff.

18 41. Defendants each had a duty to engage in reasonable supervision, monitoring, training, and
19 retention of employees, agents, members and other persons of authority within
20 Defendants' control, including Chavez.

21 42. Defendants knew or should have known that Cesar Chavez was engaging in sexually
22 violent and abusive behavior toward employees, volunteers, members and others,
23 including harassment, misogyny, sexual grooming of girls, and sexual assault and abuse
24 of girls and women. Defendants thus failed to exercise reasonable care in supervising
25 Chavez.

26 43. Defendants failed to properly supervise Cesar Chavez and intervene when necessary,
27 thereby permitting him to continue to treat women employees, volunteers, and others, in
28 an abusive, rogue and inappropriate manner - all unsupervised or improperly supervised.

Chavez's abusive behavior was known, knowable, and/or foreseeable. This lack of proper supervision was a substantial factor in causing PLAINTIFF's harm.

44. As a direct and proximate result of Defendants' wrongful conduct, individually, jointly and/or severally, Plaintiff sustained, and continues to experience, severe emotional distress, pain, emotional anguish, fear, anxiety, humiliation and other physical and emotional injuries, damages (both economic and non-economic) and permanent disability, in the past, present and future, for which this claim is made. The injuries suffered by Plaintiff are substantial, continuing and permanent, in an amount to be proven at trial.

THIRD CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

(Against All Defendants)

45. Plaintiff re-alleges and incorporates by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

46. At all times relevant to this action, Plaintiff was a tenant, employee, and member of CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–50.

47. As a tenant, employee, and member of CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–50, Plaintiff was owed a duty of due care by Defendants, and each of them, too ensure that Plaintiff was not exposed to foreseeable harm.

48. Defendants, and each of them, knew or should have known that Plaintiff was being subjected to sexually violent and abusive behavior by Cesar Chavez, and that, by failing to exercise due care to prevent the sexually violent and abusive behavior, Plaintiff could and would suffer serious emotional distress.

49. Defendants, and each of them, failed to exercise their duty of due care to prevent Cesar Chavez from committing sexually violent and abusive behavior against Plaintiff.

50. As a direct and proximate cause of the acts and omissions of Defendants, Plaintiff suffers, and continues to suffer, emotional distress and psychological damages, including physical manifestations of emotional distress, shame, loss of self-esteem, disgrace, and loss of

enjoyment of life.

51. Plaintiff alleges that Defendants are responsible for the harms she suffered.

FOURTH CAUSE OF ACTION

SEXUAL HARASSMENT (Cal. Civ. Code § 51.9)

(Against All Defendants)

52. Plaintiff re-alleges and incorporates by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

53. At all times relevant, Plaintiff was a resident at La Paz, and therefore, Defendants, CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1-50, whether directly or constructively, acted as Plaintiff's landlord as well as Plaintiff's employer.

54. Cesar Chavez, as an employee and/or agent, was under the supervision and control of CESAR CHAVEZ FOUNDATION and UFW FOUNDATION. Chavez engaged in forms of verbal and physical conduct of a sexually abusive and assaultive nature, based on Plaintiff's gender, that were unwelcome and severe. The behaviors included, but was not limited to, sexual advances, demands for sexual compliance, threats and acts of violence for the purpose of sexual engagement, and/or other forms of verbal and physical conduct of a sexual nature all under the authority as a supervisor, manager, landlord and figure of authority.

55. The incidents of sexual abuse and misconduct outlined herein took place while Plaintiff was under the care and control of Defendants, who were acting in their capacity and position as supervisors of their own employees, members and agents, including Chavez.

56. During the time Plaintiff was a tenant, employee, and member of CESAR CHAVEZ FOUNDATION and UFW FOUNDATION, Chavez intentionally, recklessly and/or wantonly committed acts which resulted in harmful and offensive contact with intimate parts of Plaintiff's person, including but not limited to, using his position of authority and trust to force Plaintiff to endure and be subjected to Chavez's abuse and assaults.

1 57. Because of Plaintiff's relationship with Defendants, Plaintiff was unable to easily
2 terminate the relationship she had with Chavez or Defendants. As a result, Plaintiff
3 was unable to, did not, and could not give consent to such heinous acts and
4 misconduct.

5 58. Despite Defendants' knowledge of the misconduct and unlawful acts committed by
6 Chavez, Defendants did nothing to investigate, supervise or monitor Chavez to ensure
7 Plaintiff's safety.

8 59. A corporation is a "person" within the meaning of Civil Code §51.9, which subjects
9 persons to liability for sexual harassment within a business, service, or professional
10 relationship, and such an entity defendant may be held liable under this statute for the
11 acts of its employees. *C.R. v. Tenet Healthcare Corp.* (2009) 169 Cal. App. 4th 1094.
12 Further, principles of ratification apply when the principal ratifies the agent's
13 originally unauthorized harassment, as is alleged to have occurred herein.

14 60. Defendants' conduct, and the conduct of their employees and/or agents, was a breach
15 of their duties to Plaintiff.

16 61. As a direct and proximate result of Defendants' wrongful conduct, individually, jointly
17 and/or severally, Plaintiff sustained, and continues to experience, severe emotional
18 distress, pain, emotional anguish, fear, anxiety, humiliation and other physical and
19 emotional injuries, damages (both economic and non-economic) and permanent disability,
20 in the past, present and future, for which this claim is made. The injuries suffered by
21 Plaintiff are substantial, continuing and permanent, in an amount to be proven at trial.

22 **FIFTH CAUSE OF ACTION**

23 **TOM BANE CIVIL RIGHTS ACT (Cal. Civ. Code § 52.1)**

24 **(Against All Defendants)**

25 62. Plaintiff re-alleges and incorporates by reference herein each and every allegation
26 contained herein above as though fully set forth and brought in this cause of action.

27 63. Defendants CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–
28 50, have interfered with Plaintiff's right to be free from gender discrimination in the

1 form of sexual harassment, exploitation, and abuse.

2 64. Cesar Chavez used his authority and reputation, bolstered by Defendants CESAR
3 CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–50 to sexually harass
4 and sexually assault Plaintiff. Such sexual harassment and assault directly interfered
5 with Plaintiff’s right to be free from gender discrimination and violence.

6 65. Upon information and belief, other women who worked for UFW reported sexual
7 harassment and assault they had experienced by Cesar Chavez and other UFW
8 employees and officials. Upon information and belief, officials, including board
9 members, of Defendants CESAR CHAVEZ FOUNDATION, UFW FOUNDATION,
10 and DOES 1–50 received actual and/or constructive notice of these allegations of
11 sexual harassment and assault. After having received actual and/or constructive
12 notice of such allegations, Defendants failed to take actions to protect others from
13 similar behavior, including Plaintiff.

14 66. Defendants CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and DOES 1–
15 50 continued to publicly promote Cesar Chavez’s image as an exemplary leader in the
16 community and to the public at large.

17 67. The acts of concealment by Defendants CESAR CHAVEZ FOUNDATION, UFW
18 FOUNDATION, and DOES 1–50 in enabling Cesar Chavez’s exploitative and
19 abusive behavior, violated Plaintiff’s right to be free from discrimination on the basis
20 of her gender under California State Law and the Fourteenth Amendment’s Equal
21 Protection Clause in the U.S. Constitution.

22 68. As a direct and proximate result of Defendants’ wrongful conduct, individually, jointly
23 and/or severally, Plaintiff sustained, and continues to experience, severe emotional
24 distress, pain, emotional anguish, fear, anxiety, humiliation and other physical and
25 emotional injuries, damages (both economic and non-economic) and permanent disability,
26 in the past, present and future, for which this claim is made. The injuries suffered by
27 Plaintiff are substantial, continuing and permanent, in an amount to be proven at trial.

SIXTH CAUSE OF ACTION
VIOLATION OF UNRUH ACT (Cal. Civ. Code § 51 et. seq.)
(Against All Defendants)

69. Plaintiff re-alleges and incorporates by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

70. Plaintiff had a right to be free from gender discrimination, sexual abuse, assault, battery and harassment under the Unruh Civil Rights Act. Plaintiff's civil rights were violated when Defendants, by and through their members, employees, agents, representatives, servants and/or contractors, intentionally concealed complaints of sexual misconduct by Chavez.

71. Defendants were acting under the color of their authority and in the scope of their employment, agency (whether actual or apparent/ostensive) or relationship during the instances when Plaintiff was an agent, member, employee, resident and/or volunteer of Defendants.

72. Defendants' decades-long pattern of knowingly exposing women to sexual abuse while concealing complaints and failing to take corrective actions constitutes intentional discrimination under the Unruh Civil Rights Act.

73. Defendants willfully created and maintained a discriminatory and predatory environment that denied women equal access to safe accommodations and working environments – all based solely on their gender.

74. Defendants denied Plaintiff full and equal advantages, facilities, privileges and protections based on her gender by allowing Chavez unfettered access to sexually abuse, assault, harass, and/or discriminate against Plaintiff by and through his position of authority as a leading figure and employee of Defendants and by actively ignoring, disregarding and concealing from Plaintiff their knowledge that Chavez was a sexual predator.

75. Under these circumstances, by continuing to employ and retain Chavez as an employee, member, and person of authority, despite knowing of Chavez's abusive, discriminatory and predatory behavior, Chavez was granted unfettered access to female members,

1 including Plaintiff, thereby exposing Plaintiff to sexual abuse and discrimination.
2 Accordingly, Defendants' actions in retaining Chavez denied Plaintiff full and equal
3 access to facilities, privileges, protections and services based on her gender.

4 76. Instead, Defendants CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and
5 DOES 1–50 continued to publicly promote Cesar Chavez's image as an exemplary
6 leader in the community and to the public at large.

7 77. The substantial motivating reason for Defendants' conduct, including actively ignoring,
8 disregarding and concealing reports and complaints of Chavez' misconduct and abuse,
9 was Plaintiff's gender, as well as the gender of the other women who were abused at his
10 hands.

11 78. As a direct and proximate result of the wrongful conduct, breaches of their duties, and acts
12 and/or omissions of CESAR CHAVEZ FOUNDATION, UFW FOUNDATION, and
13 DOES 1–50, as stated herein, Plaintiff has suffered and continues to suffer great pain
14 of mind and body, emotional distress, physical manifestations of emotional distress,
15 shame, loss of self-esteem, disgrace, and loss of enjoyment of life; has suffered and
16 continues to suffer and was prevented and will continued to be prevented from
17 obtaining the full enjoyment of life, employment and professional settings; and has
18 incurred and will incur expenses for medical and psychological treatment, therapy,
19 and counseling in an amount to be proven at trial, but in no event less than the
20 minimum jurisdictional amount of this Court.

21 79. As a further direct and proximate result of Defendants' wrongful actions, as stated herein,
22 Plaintiff is entitled to damages as set forth in California Civil Code §52 including special
23 and general damages to be determined by a jury, and attorneys' fees as may be determined
24 by the Court.

1 **PRAYER FOR RELIEF**

2 **WHEREFORE**, Plaintiff prays for a jury trial and for judgment against Defendants,
3 and each of them, as follows:

- 4 1. For past, present and future general damages in an amount to be determined at
5 trial;
- 6 2. For past, present and future special damages, including but not limited to past,
7 present and future lost earnings, economic damages and others, in an amount to be
8 determined at trial;
- 9 3. Any appropriate punitive or exemplary damages against Defendants DOES 1
10 through 50;
- 11 4. Any appropriate statutory damages;
- 12 5. For costs of suit;
- 13 6. For interest as allowed by law;
- 14 7. For attorney's fees and costs as applicable pursuant to California Code of Civil
15 Procedure §§ 52, 1021.4 and 1021.5 and Civil Code §52 against Defendants, or
16 otherwise as allowable by law;
- 17 8. For such other and further relief as the court may deem proper.

18
19 Dated: September 1, 2026

ARIAS SANGUINETTI WANG & TEAM LLP

20
21 By: 

22 MIKE ARIAS
23 SAHAR MALEK
24 NIA D. GAMBLE
25 *Attorneys for Plaintiff JANE DOE*
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DEMAND FOR JURY TRIAL

Plaintiff JANE DOE demands a jury trial in this matter.

Dated: September 1, 2026

ARIAS SANGUINETTI WANG & TEAM LLP

By: 

MIKE ARIAS
SAHAR MALEK
NIA D. GAMBLE
Attorneys for Plaintiff JANE DOE