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Attorneys for Plaintiff,
NATALIE GEVORKIAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

LOS ANGELES COUNTY SUPERIOR COURT - VAN NUYS COURTHOUSE EAST

NATALIE GEVORKIAN, an Individual,

Plaintiff,

vs.

PLANNED PARENTHOOD LOS
ANGELES, a California Nonprofit
Corporation; and DOES 1 through 10,
Inclusive,

Defendants.

Case No.: **26VEC05155**

COMPLAINT FOR:

1. Race Discrimination (Gov't Code § 12940(a));
2. National Origin Discrimination (Gov't Code § 12940(a));
3. Ancestry Discrimination (Gov't Code § 12940(a));
4. Retaliation for Protected Activity (Gov't Code § 12940(h));
5. Harassment and Hostile Work Environment (Gov't Code § 12940(j));
6. Failure to Prevent Discrimination, Harassment, and Retaliation (Gov't Code § 12940(k));
7. Wrongful Termination in Violation of Public Policy;
8. Violation of the Confidentiality of Medical Information (Civ. Code §§ 56.10, 56.20, 56.35);
9. Intrusion into Private Affairs;
10. Negligent Hiring, Supervision, and Retention;
11. Failure to Provide Rest Periods (Lab. Code § 226.7);
12. Failure to Timely Pay Wages When Due (Lab. Code § 204);
13. Failure to Timely Pay Final Wages at Separation (Lab. Code §§ 201–203);
14. Failure to Provide Accurate Itemized Wage Statements (Lab. Code § 226);



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15. Failure to Maintain Required Payroll and Employment Records (Lab. Code § 1198.5);
16. Failure to Provide Employment Records Upon Request (Lab. Code §§ 226, 1198.5);
17. Unfair Business Practices (Bus. & Prof. Code §§ 17200, *et seq.*).

Demand for Jury Trial
[UNLIMITED JURISDICTION]

1 COMES NOW Plaintiff NATALIE GEVORKIAN ("Plaintiff") and hereby brings this
2 Complaint against Defendants PLANNED PARENTHOOD LOS ANGELES, and DOES 1
3 through 10 ("Defendants"), inclusive, and alleges as follows:

4 **THE PARTIES**

5 1. Plaintiff NATALIE GEVORKIAN is, and at all relevant times herein has been, an
6 individual residing in Los Angeles County, California.

7 2. Plaintiff is informed and believes, and based thereupon alleges that at all times
8 relevant herein, Defendant PLANNED PARENTHOOD LOS ANGELES ("Defendant PPLA")
9 was a California Nonprofit Corporation with its principal corporate address located at 400 W. 30th
10 Street, Los Angeles, CA 90007, doing business in Los Angeles County, California.

11 3. Plaintiff is informed and believes, and based thereupon alleges, that at all times
12 relevant hereto, Defendants, and each of them, were the agents, employees, managing agents,
13 supervisors, co-conspirators, parent corporation, joint employers, alter ego, and/or joint ventures
14 of the other Defendants, and each of them, and in doing the things alleged herein, were acting at
15 least in part within the course and scope of said agency, employment, conspiracy, joint employer,
16 alter ego status, and/or joint venture and with the permission and consent of each of the other
17 Defendants.

18 4. The true names and capacities, whether a corporation, agent, individual, or
19 otherwise, of DOES 1 through 10, are unknown to Plaintiff, who therefore sues said Defendants
20 by such fictitious names. Each Defendant designated herein as a DOE is negligently or otherwise
21 legally responsible in some manner for the events and happenings referred to herein and thereby
22 proximately caused injuries and damages to Plaintiff as alleged herein. Plaintiff will seek leave of
23 the Court to amend this Complaint to show their true names and capacities when the same have
24 been ascertained.

25 5. At all times mentioned here, DOES 1 through 10 were the agents, representatives,
26 employees, successors, and/or assigns of Defendants and at all times pertinent hereto were acting
27 within the course and scope of their authority as such agents, representatives, employees,
28 successors, and/or assigns.

6. Plaintiff is informed and believes that at all relevant times herein mentioned, Defendant and/or DOES 1 through 10 are and were corporations, business entities, individuals, and partnerships, licensed to do business and actually doing business in the State of California. As such and based upon all the facts and circumstances incident to Defendant's business in California, Defendants are subject to the Fair Employment and Housing Act ("FEHA"), the Labor Code, and the Government Code.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction to hear this case because Plaintiff is informed and believes that the monetary damages sought in this Complaint for Defendants' conduct exceed the minimal jurisdictional limits of the Superior Court of the State of California.

8. Pursuant to the Code of Civil Procedure ("CCP") section 395(a), venue is proper in the above-entitled Court because the majority of all facts giving rise to the causes of action stated herein arose in Los Angeles County, California. Venue in Los Angeles County, California, is further proper under Government Code section 12965(b) because the unlawful practices were committed in Los Angeles County, California. Plaintiff worked in Los Angeles County, California, and Plaintiff is informed and believes that records relevant to this action are maintained in Los Angeles County, California.

9. Plaintiff is informed and believes that Defendants, and each of them, committed other wrongful acts or omissions of which Plaintiff is presently unaware. Plaintiff shall conduct discovery to identify said wrongful acts and will seek leave of the Court to amend this Complaint to add said acts upon discovery.

FACTS COMMON TO ALL CAUSES OF ACTION

10. On February 1, 2019, Plaintiff began working for Defendants as a medical assistant. Plaintiff initially worked at a clinic in Hollywood and later transferred to 7100 Van Nuys Boulevard, Suite 108, Van Nuys, 91405, where she remained for the duration of her employment.

11. Plaintiff worked as an hourly W-2 employee earning \$27.00 per hour. Her duties included patient intake, administering medications, supporting clinical procedures, and providing patient care at the Van Nuys clinic. Before the final disciplinary action leading to the end of her

employment, Plaintiff had not previously been subject to formal discipline for attendance.

12. During her employment, Plaintiff worked five days per week and regularly worked more than eight hours per day. Plaintiff was regularly called in on her days off to cover staffing shortages.

13. Throughout her employment, Plaintiff requested training and advancement opportunities. Vanessa Bernal, Plaintiff's supervisor, denied those opportunities while less-senior employees received promotions, additional responsibilities, and clinic key-holding privileges. This conduct involved terms, conditions, and privileges of employment regulated by Government Code section 12940(a).

14. During Plaintiff's employment, coworkers mocked Plaintiff's interactions with Armenian-speaking patients in front of patients. Patients noticed the conduct and complained to Plaintiff directly. This conduct involved workplace harassment regulated by Government Code section 12940(j).

15. Plaintiff reported the mocking of Armenian-speaking patient interactions to management. Plaintiff reported the conduct to Bernal and to another supervisor, Bianca, and management dismissed her concerns. Defendants' response is subject to Government Code section 12940(k).

16. An RN at the clinic made derogatory statements regarding Armenian patients and their responses to sedation. Plaintiff reported those statements to Bernal and Bianca, and her complaints were again dismissed. This conduct involved national origin and ancestry-based harassment regulated by Government Code section 12940(j).

17. Plaintiff reported discriminatory workplace conduct to management multiple times. No corrective action was taken in response to those complaints. Defendants' failure to take corrective action is subject to Government Code section 12940(k).

18. Bernal selected candidates for employment and advancement during Plaintiff's tenure. Plaintiff observed and reported that Bernal selected Hispanic candidates and rejected at least one Armenian applicant. This conduct involved employment decisions regulated by Government Code section 12940(a).

1 19. When employees of other backgrounds called out from work, management
2 communicated the absences neutrally. When Plaintiff called out, management highlighted her
3 absence in a way that singled her out. This differential treatment involved terms and conditions of
4 employment regulated by Government Code section 12940(a).

5 20. In or around March 2025, a patient visited the clinic and complained about the
6 demographic composition of the staff. After that visit, Plaintiff made a workplace comment to a
7 coworker that was reported to management. Approximately two days later, Plaintiff arrived at
8 work and was called into a meeting. Bernal and a representative from Defendants' headquarters
9 participated in that meeting.

10 21. During that meeting, Defendants issued Plaintiff a written warning and initiated a
11 probationary process. The discipline was based on three instances of minor tardiness of
12 approximately five to ten minutes during a period when Plaintiff's mother was hospitalized for a
13 serious medical condition. This adverse action followed Plaintiff's workplace complaints and is
14 regulated by Government Code section 12940(h).

15 22. After the disciplinary meeting, Plaintiff did not return to the clinic. Plaintiff
16 contacted Tyler, a headquarters representative, to report the discriminatory treatment she had
17 experienced during her employment. This protected activity is regulated by Government Code
18 section 12940(h).

19 23. Defendants then conducted an internal investigation. Plaintiff later learned from
20 coworkers that investigators asked general morale questions and did not ask about the specific
21 discrimination and harassment she had reported.

22 24. After the investigation, Priscilla, a headquarters representative, communicated
23 Defendants' response to Plaintiff. Priscilla informed Plaintiff that her complaints were not viewed
24 as serious.

25 25. Approximately three weeks after the disciplinary meeting, Plaintiff went to
26 headquarters to collect her final paperwork. Defendants took Plaintiff's badge at that time,
27 effectively confirming the end of her employment.

28 26. At separation, Plaintiff received multiple final paychecks. Plaintiff identified

inaccuracies in those separation paychecks. Defendants' obligation to pay wages during employment is regulated by Labor Code section 204, and Defendants' obligation to timely pay final wages at separation is regulated by Labor Code sections 201 through 203.

27. Following Plaintiff's departure, Bernal discussed Plaintiff with clinic staff. Bernal told clinic staff that Plaintiff should be reported to security if she appeared at the Van Nuys location.

28. After Plaintiff's employment ended, Defendants took disciplinary action against individuals involved in the conduct Plaintiff had reported. Bernal was demoted from supervisor and reassigned to a different clinic, and other employees who participated in the conduct at issue were terminated.

29. During Plaintiff's employment, Plaintiff sometimes had to forgo or interrupt rest breaks because of the operational demands of the clinic. The clinic regularly saw a high volume of patients, creating a demanding work environment. Defendants' obligation to provide compliant rest periods is regulated by Labor Code section 226.7.

30. Defendants maintained payroll and wage statement obligations for Plaintiff as an hourly employee. Plaintiff used a clock-in and clock-out system, received pay stubs, and received pay stubs showing hours worked, pay rate, and total pay. Defendants' wage statement obligations are regulated by Labor Code section 226, and Defendants' payroll and employment record obligations are regulated by Labor Code section 1198.5.

31. In 2026, Plaintiff scheduled a personal medical appointment at Defendants' Canoga Park location. The appointment involved Plaintiff's personal medical care.

32. On May 16, 2026, Plaintiff was contacted by a former coworker about that appointment. The former coworker informed Plaintiff that another former colleague was telling staff at the Van Nuys clinic about the nature and details of Plaintiff's appointment.

33. Plaintiff reported the privacy breach to Defendants' headquarters. On May 18, 2026, a representative from Defendants contacted Plaintiff regarding the complaint.

34. In or around May 2026, Defendants sent Plaintiff written correspondence about the privacy breach. Defendants acknowledged that a staff member had inappropriately accessed

1 Plaintiff's protected health information. This conduct is regulated by Civil Code sections 56.10,
2 56.20, and 56.35.

3 35. After the written correspondence, a representative from Defendants' compliance
4 department contacted Plaintiff. That representative confirmed that a staff member accessed
5 Plaintiff's chart and reviewed records unrelated to any legitimate purpose.

6 36. The unauthorized access and disclosure involved Plaintiff's medical information on
7 Defendants' systems. Defendants advised Plaintiff to take protective measures against potential
8 harm, including the possibility of identity theft resulting from exposure of her personal
9 information.

10 37. Plaintiff suffered harm from Defendants' conduct. The harms included lost wages,
11 lost benefits, emotional distress, fear of identity theft, and loss of personal security.

12 38. Plaintiff requested employment records from Defendants through counsel. The
13 demand letter advised Defendants that a formal records request was enclosed and requested
14 production of employment records. Defendants' obligation to provide employment records upon
15 request is regulated by Labor Code sections 226 and 1198.5.

16 39. Defendants' wage-and-hour, recordkeeping, and final pay practices affected
17 Plaintiff's rights as an employee. Plaintiff alleges rest period violations, inaccurate final paychecks,
18 inaccurate wage statements, and failure to produce requested employment records. These practices
19 are regulated by Business and Professions Code sections 17200, *et seq.*

20 40. Plaintiff filed timely charges with the Civil Rights Department and received notices
21 of the right to sue in a California Superior Court pursuant to Government Code section 12965(b),
22 thereby permitting Plaintiff to bring this legal action. Plaintiff has therefore exhausted all
23 administrative remedies required under the Government Code. Attached hereto and incorporated
24 herein as **Exhibit 1** is Plaintiff's Right to Sue Letter.

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1 **FIRST CAUSE OF ACTION**

2 **Race Discrimination**

3 **(Gov't Code § 12940(a))**

4 **(Against All Defendants and DOES 1-10)**

5 41. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
6 as though fully set forth herein.

7 42. At all times herein mentioned, Government Code section 12940(a) was in full force
8 and effect and was binding on Defendants. This statute prohibits employers from discriminating
9 against employees on the basis of race.

10 43. Throughout the relevant time period, Plaintiff observed and reported that
11 Defendants' supervisor selected Hispanic candidates for employment and advancement while
12 rejecting at least one Armenian applicant, and less-senior employees received promotions,
13 additional responsibilities, and clinic key-holding privileges that were denied to Plaintiff.
14 Additionally, management treated Plaintiff's call-outs differently from those of employees of other
15 backgrounds by singling her out, and Plaintiff was subjected to a written warning and probationary
16 process shortly after her workplace complaints, based on instances of minor tardiness during a
17 period when her mother was hospitalized. These employment decisions and differential treatment
18 support that Plaintiff was subjected to adverse employment actions motivated by her race.

19 44. By virtue of Plaintiff's race, Plaintiff is a member of a protected class under FEHA.

20 45. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
21 suffered and continues to suffer substantial damages, in an amount to be proven at trial.

22 46. Defendants' actions were willful and in conscious disregard of Plaintiff's rights,
23 thereby entitling Plaintiff to punitive damages pursuant to Civil Code section 3294

24 **SECOND CAUSE OF ACTION**

25 **National Origin Discrimination**

26 **(Gov't Code § 12940(a))**

27 **(Against All Defendants and DOES 1-10)**

28 47. Plaintiff hereby incorporates by reference the allegations in the paragraphs above

as though fully set forth herein.

48. At all times herein mentioned, Government Code section 12940(a) was in full force and effect and was binding on Defendants. This statute prohibits employers from discriminating against employees on the basis of national origin.

49. Throughout the relevant time period, Plaintiff reported that Defendants' supervisor selected candidates for employment and advancement in a manner that disfavored employees of Armenian national origin, an RN made derogatory statements regarding Armenian patients, and management dismissed Plaintiff's complaints about those statements. Plaintiff was also denied training and advancement opportunities that were extended to less-senior employees, and was subjected to discipline following her workplace complaints. These employment decisions and differential treatment support that Plaintiff was subjected to adverse employment actions motivated by her national origin.

50. By virtue of Plaintiff's national origin, Plaintiff is a member of a protected class under FEHA.

51. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered and continues to suffer substantial damages, in an amount to be proven at trial.

52. Defendants' actions were willful and deliberate, and in conscious disregard of Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section 3294.

THIRD CAUSE OF ACTION

Ancestry Discrimination

(Gov't Code § 12940(a))

(Against All Defendants and DOES 1-10)

53. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

54. At all times herein mentioned, Government Code section 12940(a) was in full force and effect and was binding on Defendants. This statute prohibits employers from discriminating against employees on the basis of ancestry.

55. Throughout the relevant time period, Plaintiff and her interactions with Armenian-speaking patients were mocked by coworkers in front of patients, an RN made derogatory statements regarding Armenian patients based on their ancestry, and management dismissed Plaintiff's complaints about this conduct. Plaintiff was denied advancement opportunities while less-senior employees were promoted, and was subjected to discipline following her workplace complaints. These employment decisions and differential treatment support that Plaintiff was subjected to adverse employment actions motivated by her ancestry.

56. By virtue of Plaintiff's ancestry, Plaintiff is a member of a protected class under FEHA.

57. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered and continues to suffer substantial damages, in an amount to be proven at trial.

58. Defendants' actions were willful and deliberate, and in conscious disregard of Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section 3294.

FOURTH CAUSE OF ACTION

Retaliation for Protected Activity

(Gov't Code § 12940(h))

(Against All Defendants and DOES 1-10)

59. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

60. At all times herein mentioned, Government Code section 12940(h) was in full force and effect and was binding on Defendants. This statute prohibits employers from retaliating against employees for engaging in protected activities.

61. Throughout the relevant time period, Plaintiff reported the mocking of Armenian-speaking patient interactions to Defendants' supervisors, reported derogatory statements made by an RN regarding Armenian patients, and reported the discriminatory treatment she experienced during her employment to Defendants' headquarters representatives. Following those complaints, Defendants issued Plaintiff a written warning and initiated a probationary process based on minor

1 instances of tardiness during a period when her mother was hospitalized, and Defendants
2 subsequently confirmed the end of her employment. The timing between Plaintiff's protected
3 complaints and those adverse actions supports that Defendants intentionally acted against Plaintiff
4 because she engaged in activity protected under Government Code section 12940(h).

5 62. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
6 suffered and continues to suffer substantial damages, in an amount to be proven at trial.

7 63. Defendants' actions were willful and deliberate, and in conscious disregard of
8 Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section
9 3294.

10 **FIFTH CAUSE OF ACTION**

11 **Harassment and Hostile Work Environment**

12 **(Gov't Code § 12940(j))**

13 **(Against All Defendants and DOES 1-10)**

14 64. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
15 as though fully set forth herein.

16 65. At all times herein mentioned, Government Code section 12940(j) was in full force
17 and effect and was binding on Defendants. This statute prohibits harassment and the creation of a
18 hostile work environment on the basis of protected characteristics.

19 66. Throughout the relevant time period, coworkers mocked Plaintiff's interactions
20 with Armenian-speaking patients in front of patients, an RN made derogatory statements regarding
21 Armenian patients and their responses to sedation based on their ancestry and national origin, and
22 management dismissed Plaintiff's complaints about this conduct on multiple occasions. These
23 repeated incidents, based on Plaintiff's race, national origin, and ancestry, were sufficiently severe
24 or pervasive to alter the conditions of Plaintiff's employment and create an abusive working
25 environment.

26 67. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
27 suffered and continues to suffer substantial damages, in an amount to be proven at trial.

28 68. Defendants' actions were willful and deliberate, and in conscious disregard of

1 Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section
2 3294.

3 **SIXTH CAUSE OF ACTION**

4 **Failure to Prevent Discrimination, Harassment, and Retaliation**

5 **(Gov't Code § 12940(k))**

6 **(Against All Defendants and DOES 1-10)**

7 69. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
8 as though fully set forth herein.

9 70. At all times herein mentioned, Government Code section 12940(k) was in full force
10 and effect and was binding on Defendants. This statute requires employers to take all reasonable
11 steps necessary to prevent discrimination, harassment, and retaliation.

12 71. Throughout the relevant time period, Plaintiff reported the mocking of her
13 interactions with Armenian-speaking patients, the derogatory statements made by an RN regarding
14 Armenian patients, and the discriminatory treatment she experienced during her employment to
15 Defendants' supervisors and headquarters representatives on multiple occasions. Despite receiving
16 those complaints, Defendants failed to take corrective action, dismissed Plaintiff's concerns,
17 conducted an investigation that did not address the specific discrimination and harassment she
18 reported, and ultimately confirmed the end of her employment after she engaged in protected
19 activity. The record shows Defendants failed to take reasonable steps to prevent or correct the
20 unlawful conduct despite having repeated notice of it.

21 72. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
22 suffered and continues to suffer substantial damages, in an amount to be proven at trial.

23 73. Defendants' actions were willful and deliberate, and in conscious disregard of
24 Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section
25 3294.

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1 **SEVENTH CAUSE OF ACTION**

2 **Wrongful Termination in Violation of Public Policy**

3 **(Against All Defendants and DOES 1-10)**

4 74. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
5 as though fully set forth herein.

6 75. Defendants' termination of Plaintiff's employment constituted a violation of
7 fundamental public policy, as articulated in the Constitution and statutory laws of the State of
8 California, which safeguard the rights of employees.

9 76. Throughout the relevant time period, Plaintiff began working for Defendants on
10 February 1, 2019, had not previously been subject to formal discipline for attendance before the
11 final disciplinary action, and reported discriminatory workplace conduct to management on
12 multiple occasions throughout her employment. After Plaintiff reported the discriminatory
13 treatment she experienced to Defendants' headquarters representatives, Defendants conducted an
14 investigation that did not address the specific complaints she had made, informed Plaintiff that her
15 complaints were not viewed as serious, and subsequently confirmed the end of her employment
16 by taking her badge approximately three weeks after the disciplinary meeting. Those facts support
17 that Defendants terminated Plaintiff for reasons that contravened fundamental workplace
18 protections, including the public policies underlying Government Code section 12940 *et seq.*

19 77. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
20 suffered and continues to suffer substantial damages, in an amount to be proven at trial.

21 78. Defendants' actions were willful and in conscious disregard of Plaintiff's rights,
22 thereby entitling Plaintiff to punitive damages pursuant to Civil Code section 3294.

23 **EIGHTH CAUSE OF ACTION**

24 **Violation of the Confidentiality of Medical Information**

25 **(Civ. Code §§ 56.10, 56.20, 56.35)**

26 **(Against All Defendants and DOES 1-10)**

27 79. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
28 as though fully set forth herein.

80. At all times herein mentioned, Civil Code sections 56.10, 56.20, and 56.35 were in full force and effect and were binding on Defendants. These statutes prohibit the unauthorized disclosure or use of an employee's confidential medical information and provide for civil remedies where such information is improperly disclosed.

81. Throughout the relevant time period, Plaintiff scheduled a personal medical appointment at Defendants' Canoga Park location, a staff member accessed Plaintiff's protected health information without authorization, and that information was then disclosed to staff at the Van Nuys clinic. Defendants acknowledged in written correspondence that a staff member had inappropriately accessed Plaintiff's protected health information, and a compliance representative confirmed that the staff member accessed Plaintiff's chart and reviewed records unrelated to any legitimate purpose. Defendants also advised Plaintiff to take protective measures against potential harm, including the possibility of identity theft resulting from exposure of her personal information.

82. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered and continues to suffer substantial damages, including emotional distress, fear of identity theft, and loss of personal security, in an amount to be proven at trial.

83. Defendants' actions were willful and deliberate, and in conscious disregard of Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section 3294.

NINTH CAUSE OF ACTION

Intrusion into Private Affairs

(Against All Defendants and DOES 1-10)

84. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

85. Plaintiff had a reasonable expectation of privacy in the personal medical information contained in her medical records at Defendants' Canoga Park location. The unauthorized access to and disclosure of Plaintiff's private medical information constitutes an intrusion into a private matter in which Plaintiff held a reasonable expectation of privacy.

86. Throughout the relevant time period, a staff member employed by Defendants accessed Plaintiff's medical chart without authorization and reviewed records unrelated to any legitimate purpose, and Plaintiff's private medical information was subsequently disclosed to others at the Van Nuys clinic. This unauthorized intrusion into Plaintiff's private medical records would be highly offensive to a reasonable person. Defendants acknowledged the improper access in written correspondence and through a compliance representative.

87. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered and continues to suffer substantial damages, including emotional distress, fear of identity theft, and loss of personal security, in an amount to be proven at trial.

88. Defendants' actions were willful and deliberate, and in conscious disregard of Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section 3294.

TENTH CAUSE OF ACTION

Negligent Hiring, Supervision, and Retention

(Against All Defendants and DOES 1-10)

89. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

90. Defendants had a duty to exercise reasonable care in hiring, supervising, and retaining their employees, including managers and supervisors who had authority over the Plaintiff.

91. Defendants breached this duty by negligently hiring, supervising, and retaining employees who engaged in unlawful conduct against Plaintiff. Defendants knew or should have known that their employees were likely to be unfit and engage in unlawful conduct.

92. As a direct and proximate result of the Defendants' negligent hiring, supervision, and retention, the Plaintiff has suffered and continues to suffer substantial damages, the amount of which will be proven at trial.

93. Defendants' actions were willful and deliberate, and in conscious disregard of Plaintiff's rights, thereby entitling Plaintiff to punitive damages pursuant to Civil Code section

3294.

ELEVENTH CAUSE OF ACTION

Failure to Provide Rest Periods

(Lab. Code § 226.7)

(Against All Defendants and DOES 1-10)

94. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

95. At all times herein mentioned, Labor Code section 226.7 was in full force and effect and was binding on Defendants. This statute requires employers to provide employees with rest periods in accordance with applicable wage orders.

96. Throughout the relevant time period, Defendants failed to provide Plaintiff with the required rest breaks by maintaining work demands at the Van Nuys clinic that did not allow for compliant, uninterrupted rest periods. The clinic regularly saw a high volume of patients, Plaintiff regularly worked more than eight hours per day and was called in on her days off, and the operational demands of the clinic required Plaintiff to forgo or interrupt rest breaks.

97. Defendants' failure to provide compliant rest periods was knowing and intentional.

98. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered damages in the form of unpaid premium wages for missed rest periods in an amount to be proven at trial.

99. Pursuant to Labor Code section 226.7, Plaintiff is entitled to recover one additional hour of pay at the regular rate of compensation for each workday that a compliant rest period was not provided.

TWELFTH CAUSE OF ACTION

Failure to Timely Pay Wages When Due

(Lab. Code § 204)

(Against All Defendants and DOES 1-10)

100. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

101. At all times herein mentioned, Labor Code section 204 was in full force and effect and was binding on Defendants. This statute requires employers to pay wages earned in accordance with a regular pay schedule.

103. Defendants' failure to timely pay wages when due was knowing and intentional.

THIRTEENTH CAUSE OF ACTION

105. Plaintiff hereby incorporates by reference the allegations in the paragraphs above as though fully set forth herein.

107. Throughout the relevant time period, Defendants willfully and deliberately failed to pay all wages due at the time of Plaintiff's separation. Plaintiff received multiple final paychecks and identified inaccuracies in those separation paychecks, demonstrating that Defendants failed to promptly and accurately pay all wages owed upon the end of Plaintiff's employment.

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1 **FOURTEENTH CAUSE OF ACTION**

2 **Failure to Provide Accurate Itemized Wage Statements**

3 **(Lab. Code § 226)**

4 **(Against All Defendants and DOES 1-10)**

5 109. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
6 as though fully set forth herein.

7 110. At all times herein mentioned, Labor Code section 226 was in full force and effect
8 and was binding on Defendants. This statute requires employers to provide accurate, itemized
9 wage statements that contain specified information.

10 111. Throughout the relevant time period, Defendants failed to provide Plaintiff with
11 accurate, itemized wage statements that accurately reflected all hours worked, applicable hourly
12 rates, gross wages earned, net wages earned, all deductions, and other required information.
13 Plaintiff received pay stubs reflecting her hours worked, pay rate, and total pay, and identified
14 inaccuracies in her separation paychecks, demonstrating that the wage statements she received did
15 not accurately reflect all wages owed.

16 112. Defendants' failure to provide accurate wage statements was knowing and
17 intentional.

18 113. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has
19 suffered damages and is entitled to recover penalties under Labor Code section 226.3.

20 **FIFTEENTH CAUSE OF ACTION**

21 **Failure to Maintain Required Payroll and Employment Records**

22 **(Lab. Code § 1198.5)**

23 **(Against All Defendants and DOES 1-10)**

24 114. Plaintiff hereby incorporates by reference the allegations in the paragraphs above
25 as though fully set forth herein.

26 115. At all times herein mentioned, Labor Code section 1198.5 was in full force and
27 effect and was binding on Defendants. These statutes require employers to maintain accurate
28 payroll and employment records.

as though fully set forth herein.

125. Business and Professions Code sections 17200, *et seq.* prohibit unfair competition, including any unlawful, unfair, or fraudulent business practices.

126. Throughout the relevant time period, Defendants willfully engaged in unfair and unlawful practices by imposing policies that resulted in the loss of earned compensation and benefits, including failure to provide compliant rest periods, failure to timely pay wages when due, failure to accurately pay final wages at separation, failure to provide accurate wage statements, and failure to produce employment records upon request.

127. Defendants intentionally maintained business practices that systematically caused Plaintiff to lose money and property. These ongoing actions resulted in direct financial harm to Plaintiff.

128. These actions constitute unfair business practices in violation of Business and Professions Code sections 17200, *et seq.*

129. Pursuant to Business and Professions Code section 17203, Plaintiff seeks restitution of all benefits Defendants have received from their unfair and unlawful business practices.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- a. For general and special damages, including past and future lost earnings, employment benefits, and damages for emotional distress, humiliation, and mental anguish;
- b. For equitable relief, including reinstatement, rehiring, and front pay in lieu of reinstatement;
- c. For unpaid wages and other earned compensation pursuant to Labor Code sections 201 through 204;
- d. For rest-period premium wages pursuant to Labor Code section 226.7;
- e. For statutory penalties pursuant to Labor Code sections 203, 226, 226.3, 226.7, 1198.5, and any others that may be applicable;
- f. For restitution of all benefits Defendants acquired through unfair business practices

pursuant to Business and Professions Code section 17203;

g. For reasonable attorneys' fees pursuant to Government Code section 12965(b) and Labor Code sections 226 and 1198.5;

h. For prejudgment interest pursuant to Civil Code section 3287 and Labor Code section 218.6;

i. For punitive damages pursuant to Civil Code section 3294;

j. For costs of suit incurred herein; and

k. For such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all causes of action and claims to which Plaintiff has a right to a jury trial.

Dated: September 4, 2026

LAUREL EMPLOYMENT LAW



Elizabeth Villarreal, Esq.
Attorneys for Plaintiff, Natalie Gevorkian

EXHIBIT 1



Civil Rights Department

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

September 4, 2026

Elizabeth Villarreal

RE: **Notice to Complainant's Attorney**
CRD Matter Number: 202609-37096504
Right to Sue: Gevorkian / Planned Parenthood Los Angeles

Dear Elizabeth Villarreal:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) 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, CRD 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 CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

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September 4, 2026

RE: Notice of Filing of Discrimination Complaint

CRD Matter Number: 202609-37096504

Right to Sue: Gevorkian / Planned Parenthood Los Angeles

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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

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

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September 4, 2026

Natalie Gevorkian

RE: **Notice of Case Closure and Right to Sue**
CRD Matter Number: 202609-37096504
Right to Sue: Gevorkian / Planned Parenthood Los Angeles

Dear Natalie Gevorkian:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective September 4, 2026 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.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

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

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Natalie Gevorkian

CRD No. 202609-37096504

Complainant,

vs.

Planned Parenthood Los Angeles

,

Respondents

1. Respondent **Planned Parenthood Los Angeles** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant **Natalie Gevorkian**, resides in the City of , State of .

3. Complainant alleges that on or about **March 1, 2025**, respondent took the following adverse actions:

Complainant was harassed because of complainant's ancestry, national origin (includes language restrictions), other, race (includes hairstyle and hair texture).

Complainant was discriminated against because of complainant's ancestry, national origin (includes language restrictions), other, race (includes hairstyle and hair texture) and as a result of the discrimination was terminated, denied any employment benefit or privilege, other.

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment and as a result was terminated, denied any employment benefit or privilege, other.

Additional Complaint Details: Beginning on February 1, 2019, Natalie Gevorkian worked for Planned Parenthood Los Angeles as an hourly medical assistant at the Van Nuys clinic,

1 where she repeatedly sought training, advancement, and fair access to promotional
2 opportunities, but her supervisor denied those opportunities while less-senior employees
3 received promotions, added responsibilities, and key-holding privileges. Over the course of
4 her employment, Defendants subjected Natalie to FEHA violations based on race, national
5 origin, and ancestry by allowing coworkers to mock her interactions with Armenian-speaking
6 patients, permitting derogatory comments about Armenian patients and their medical care,
7 dismissing Natalie's repeated complaints to supervisors and management, and maintaining
8 employment practices that favored non-Armenian employees in hiring, training, promotion,
9 and workplace treatment. By March 2025, after Natalie continued objecting to discriminatory
10 and harassing conduct, Defendants escalated the retaliation by singling her out, issuing
11 discipline and placing her into a probationary process shortly after her protected complaints,
12 and then confirming the end of her employment after she reported the discriminatory
13 treatment to headquarters. Defendants further violated FEHA by failing to prevent
14 discrimination, harassment, and retaliation: instead of taking reasonable corrective action,
15 they conducted a superficial investigation that did not address the specific discrimination
16 and harassment Natalie reported, told her the complaints were not viewed as serious, and
17 only later disciplined individuals involved in the same conduct she had been reporting.
18 Defendants also committed Labor Code violations by failing to provide compliant,
19 uninterrupted rest periods in a high-volume clinic, failing to timely pay all wages when due,
20 failing to accurately and timely pay final wages at separation, issuing inaccurate wage
21 statements, failing to maintain accurate payroll and employment records, failing to provide
22 complete employment records upon request, and engaging in unfair business practices
23 through wage-and-hour, recordkeeping, and final-pay violations.
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1 VERIFICATION

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

6 On September 4, 2026, I declare under penalty of perjury under the laws of the State
7 of California that the foregoing is true and correct.

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Los Angeles, CA