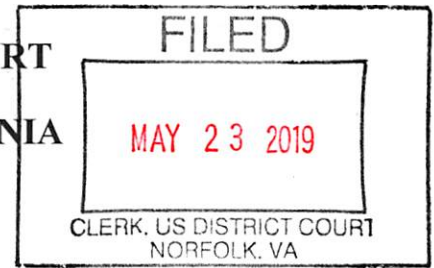


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



SHANE M. JENKINS, ESQ., on
behalf of himself and others similarly
situated,

Plaintiff,

vs.

WAL-MART STORES, INC.,

Defendant

Case No. 2:19cv271

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT

Plaintiff, Shane M. Jenkins, Esq. (“Plaintiff” or “Shane”), *pro se*, brings this action against Defendant, Wal-Mart Stores, Inc. (“Wal-Mart” or “Defendant”), on behalf of himself and similarly situated Wal-Mart consumers, including (1) consumers who were singled out and treated less favorably by a Wal-Mart employee on the basis of race, national origin, or other impermissible criterion while attempting to leave the premises, resulting in the consumer being harassed, defamed, assaulted, or falsely imprisoned as part of Wal-Mart’s loss prevention practices, or (2) consumers with disabilities who were detained or assaulted by a Wal-Mart employee performing loss prevention-related acts resulting in the

consumer being denied reasonable accommodation, denied access, or interfering with full and equal enjoyment of goods and services offered by Wal-Mart.

I. INTRODUCTION

1. Wal-Mart is the Goliath of retail and the largest private employer in the United States. Unlike its competitors (*e.g.*, Amazon.com, Kroger, and Target), Wal-Mart has implemented a single, nationwide loss prevention policy targeting *potential* shoplifters, rather than known or suspected shoplifters. This subtle policy shift has nurtured consumer racial profiling by Wal-Mart employees who perform loss prevention-related acts, including enforcing receipt checking policy.

2. As Wal-Mart reduced full-time positions and shifted to a part-time workforce, Wal-Mart has become increasingly more reliant on its greeters (hereinafter this term includes positions such as customer host and any position involving receipt checking) to perform loss prevention functions. In the summer of 2016, this culminated in the creation of 9,000 new hourly positions with the stated purpose of “deter[ring] would-be shoplifters.”

3. For many Americans, encounters with Wal-Mart greeters have become reminiscent of the Nazi Germany Gestapo because Wal-Mart greeters have targeted minorities and other protected classes and demanded “papers, please.” The result is harassment, detention, and interrogation. In some cases, innocent consumers who fail to comply—whether inadvertent or intentional—have been

assaulted, arrested, or suffered serious bodily harm or death. Such experiences are reported in the news and documented across social media.

4. Nonminority consumers are also experiencing the effects of delegating loss prevention functions to Wal-Mart greeters. In predominantly minority areas, minority Wal-Mart greeters have targeted nonminority consumers, resulting in reverse discrimination.

5. Wal-Mart greeters are trained—whether formally or informally—to physically touch a consumer or grab a consumer’s shopping cart. This type of treatment has imposed an unreasonable risk of serious bodily harm or death on innocent Americans with disabilities who become the unwitting target of a Wal-Mart greeter and who are detained or assaulted. This risk is a constructive barrier to the goods and services offered by Wal-Mart.

6. YouTube user, lesliep4819, summarizes the issue as follows: “YouTube is full of videos where Walmart has ALREADY illegally searched people's belongings, abused disabled people, invaded people's privacy, and hired off-duty cops to be their stormtroopers, so that if you refuse, they beat the [expletive] [out of] you.”

7. Accordingly, Shane alleges that Wal-Mart harassed, defamed, assaulted, or falsely imprisoned Shane and other putative Class Members who were singled out and treated less favorably on the basis of race, national origin, or

other impermissible criterion in violation of Title II of the Civil Rights Act of 1964, 42 U.S.C. § 2000a et seq.

8. Shane further alleges that Wal-Mart's loss prevention policy, and enforcement thereof, continue to pose an inequitable and unreasonable risk of serious bodily harm or death to Shane and other putative Class Members with disabilities, resulting in the denial of access or interference with full and equal enjoyment of goods and services offered by Wal-Mart in violation of Title III of the Americans with Disabilities Act, 42 U.S.C. § 12101 et seq., (the "ADA").

9. This action seeks an end to Wal-Mart's discriminatory practices, make whole relief for the class, and punitive damages.

II. JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction over Plaintiff's federal claims pursuant to 42 U.S.C. § 2000a6(a), 28 U.S.C. §§ 1331 and 1343(a)(4). The Court has supplemental jurisdiction pursuant to 28 U.S.C. 1367 over claims under state law, as the claims are so related to his federal claims that they form the same case or controversy.

11. This Court has subject matter jurisdiction over Plaintiff's claims pursuant to 28 U.S.C. § 1332 in that it is a civil action between citizens of different states where the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

12. Venue is proper in this District pursuant to 28 U.S.C. § 1391, because all parties are deemed to reside in this District.

III. PARTIES

13. Shane is an American Indian, suffers from the effects of craniosynostosis, including multiple fontanel where large portions of skull were surgically removed, is a qualified person with a disability under 42 U.S.C. § 12102(A), and resides in Suffolk, Virginia.

14. Defendant Wal-Mart Stores, Inc. is a Delaware corporation with stores throughout Virginia. Its corporate headquarters is located in Arkansas. Wal-Mart Stores, Inc. operates retail stores doing business as Wal-Mart and Wal-Mart Supercenters.

IV. PLAINTIFF'S FACTUAL ALLEGATIONS

15. On June 16, 2018, Shane was a consumer at Wal-Mart, 230 Southpark Circle, Colonial Heights, VA 23834. With the assistance of a female Wal-Mart employee, Shane purchased goods totaling \$144.18.

16. As Shane proceeded to his car with the purchased goods, a Wal-Mart greeter forcibly pulled his shopping cart away and stated "Show me your receipt." The employee's action caused Shane's shopping cart to fall over and Shane's property to spill onto the parking lot.

17. As a result of the shopping cart being forcibly pulled away, Shane became disoriented, lost his balance, and began stumbling.

18. The disturbance created the appearance that the Wal-Mart greeter was apprehending a shoplifter and incited two bystanders to assist the Wal-Mart greeter by tackling Shane to the ground. The attack resulted in Shane's head resting inside his shopping cart.

19. Thereafter, Wal-Mart employees opened Shane's bags and performed a comprehensive search for the sole purpose of prosecuting Shane as a shoplifter.

20. Colonial Heights Police Department concluded that Shane had purchased all items and he was transported by ambulance to the hospital.

21. Following the incident, Wal-Mart took possession of the purchased goods and failed to issue any refund to Shane's credit card.

22. Shane was psychologically unable to return to Wal-Mart for his purchased goods and Wal-Mart refused to speak with Shane by phone.

23. By letter dated July 11, 2018, through its subsidiary, Claims Management, Inc., Wal-Mart notified Shane that he was not entitled to the purchased goods.

COUNT 1: CIVIL RIGHTS VIOLATION

24. Shane incorporates all other allegations contained herein.

25. Wal-Mart's decision to target Shane and its decision to use force

against Shane were based on race, national origin, or other impermissible criterion.

26. Wal-Mart's decision to conduct a comprehensive search of Shane's purchased goods despite no evidence of shoplifting was discriminatory treatment.

27. Wal-Mart's decision to deprive Shane of his property interest in the purchased goods was intended to oppress, intimidate, threaten and interfere with Shane's civil rights and to coerce Shane into quietly acquiescing to the discriminatory treatment.

28. Wal-Mart's actions denied Shane equal access to its goods and services for discriminatory reasons and subjected Shane to disparate treatment which had the effect of deterring access.

29. As a result, Shane suffered actual damages.

COUNT 2: ADA Violation

30. Shane incorporates all other allegations contained herein.

31. Prior to Shane's shopping cart being forcibly pulled away, Shane was unaware a Wal-Mart greeter had requested his receipt and was pursuing him.

32. Wal-Mart's use of greeters to administer loss prevention had the effect of discriminating against Shane on the basis of a disability. Specifically, Shane's head is highly vulnerable because large portions of skull were surgically removed. Consequently, any physical assault resulting in injury to Shane's head poses a risk of serious bodily harm or death to Shane.

33. Wal-Mart failed to make reasonable modifications in its loss prevention policies, practices, or procedures necessary to eliminate the risk of serious bodily harm or death to individuals with disabilities who are targeted by a Wal-Mart employee performing loss prevention-related acts.

34. Wal-Mart failed to provide auxiliary aids and services to ensure effective communication with individuals with disabilities.

35. Wal-Mart has constructively denied Shane access to its goods and services, interfered with Shane's full and equal enjoyment of goods and services offered by Wal-Mart, and limited Shane's ability to obtain such goods and services at the best value.

36. As a result, Shane suffered actual damages.

COUNT 3: DEFAMATION PER SE

37. Shane incorporates all other allegations contained herein.

38. The Wal-Mart greeter's act of forcibly pulling away Shane's shopping cart and demanding Shane's receipt was a defamatory statement.

39. Based on the defamatory statement, bystanders believed Shane was "fleeing" Wal-Mart with stolen merchandise.

40. Wal-Mart's false statement accused Shane of a crime involving moral turpitude. Because another Wal-Mart employee assisted Shane during checkout, Wal-Mart had actual knowledge that the statement was false.

41. As a result, Shane suffered, and will continue to suffer from, embarrassment, frustration, humiliation and a sense of increased vulnerability.

COUNT 4: FALSE IMPRISONMENT

42. Shane incorporates all other allegations contained herein.

43. Wal-Mart's act caused Shane to be confined to a small portion of Wal-Mart's parking lot and partly within a shopping cart without Shane's consent and without the authority of law.

44. Wal-Mart intended to detain Shane because the result was the natural and probable consequence of Wal-Mart's actions.

45. As a result, Shane suffered actual damages.

COUNT 5: BATTERY

46. Shane incorporates all other allegations contained herein.

47. Shane's shopping cart was an extension of his person and the Wal-Mart greeter intended to physically touch the shopping cart.

48. The Wal-Mart greeter's act of forcibly pulling away Shane's shopping cart was a harmful or offensive contact to Shane's person and created a reasonable apprehension in Shane of further harm to his person.

49. Wal-Mart allows its employees to grab a consumer's shopping cart knowing that such contact would be harmful or offensive.

50. As a result, Shane suffered actual damages.

COUNT 6: NEGLIGENCE

51. Shane incorporates all other allegations contained herein.

52. The Wal-Mart greeter's loss prevention-related acts were performed within the scope of employment and in the interest of Wal-Mart.

53. The Wal-Mart greeter was acting under the supervision and control of Wal-Mart through its store managers and other supervisors.

54. Wal-Mart had a duty to its consumers, including Shane, to properly supervise, direct, and control its employees so that their actions would not present a risk of harm or danger to consumers.

55. In addition, because Wal-Mart's employee had placed Shane's life in peril, Wal-Mart owed Shane a special duty to provide aid and assistance.

56. Wal-Mart breached its duties by:

- (a) failing to adequately screen out undesirable or unsuitable candidates during the hiring process for greeter positions;
- (b) failing to adequately train all employees who perform loss prevention-related acts;
- (c) failing to ensure its employees apply objective standards before performing loss prevention-related acts;
- (d) failing to properly supervise employees or adequately monitor their interaction with customers, particularly employees

performing loss prevention-related acts;

- (e) failing to establish and implement adequate standard operating procedures and regulations designed to eliminate the risk of innocent consumers being physically assaulted by Wal-Mart employees performing loss prevention-related acts; or
- (f) failing to establish and implement emergency procedures to aid and assist consumers who have been physically assaulted by a Wal-Mart employee.

57. Wal-Mart had actual or constructive knowledge that innocent consumers could be harmed by Wal-Mart greeters who physically touch consumers or grab shopping carts.

58. As the direct and proximate result of Wal-Mart's negligence, Shane suffered damages.

COUNT 7: VICARIOUS LIABILITY

59. Shane incorporates all other allegations contained herein.

60. At all relevant times, Wal-Mart is vicariously responsible for the actions or omissions of its employees and the natural and probable consequences of their actions or omissions.

61. As the direct and proximate result of the actions and omissions of Wal-Mart's employees, Shane suffered damages.

COUNT 8: CONVERSION

62. Shane incorporates all other allegations contained herein.

63. Wal-Mart is exercising dominion and control over Shane's purchased goods. Shane is the rightful owner of the purchased goods.

64. Wal-Mart is intentionally interfering with Shane's right of possession in his purchased goods.

65. As a result, Shane suffered damages.

**V.
CLASS ALLEGATIONS**

66. Plaintiff brings this action pursuant to Rule 23 (a) and (b)(3) of the Federal Rules of Civil Procedure on behalf of the following classes:

- (a) All Wal-Mart consumers between 2016 and the present who (1) purchased goods from Wal-Mart, (2) were singled out and treated less favorably on the basis of race, national origin, or other impermissible criterion by a Wal-Mart employee performing loss prevention-related acts, including receipt checking, and (3) the consumer was innocent of shoplifting; OR
- (b) All Wal-Mart consumers between 2016 and the present who (1) are a qualified person with a disability, (2) purchased goods from Wal-Mart, (3) were assaulted or detained by a Wal-Mart employee performing loss prevention-related acts, including

receipt checking, and (4) such acts constituted a denial of access or interference with full and equal enjoyment of goods and services in light of the disability.

67. Excluded from the Class are all consumers who previously reached settlements or judgments against Wal-Mart resolving or releasing any claims related to discriminatory treatment by Wal-Mart employees performing loss prevention-related acts.

Impracticability of Joinder

68. The proposed Class is so numerous that joinder is impracticable. On information and belief, millions of consumers are members of the proposed Class and are geographically dispersed throughout the United States.

69. Wal-Mart is the world's largest publicly-owned corporation and retailer, with stores in all 50 states and the District of Columbia.

Commonality

70. There are numerous questions of law and fact that are common to each member of the proposed Class.

71. The central questions in this case are:

- (a) whether Wal-Mart's 2016 loss prevention policy targeting potential shoplifters resulted in a pattern or practice of racial consumer profiling and constitutes discrimination pursuant to

Title II of the Civil Rights Act of 1964;

- (b) whether Wal-Mart's use of greeters to perform loss prevention-related acts resulted in the disparate treatment of minorities and other protected classes and constitutes discrimination pursuant to Title II of the Civil Rights Act of 1964; and
- (c) whether Wal-Mart's loss prevention-related acts against consumers who are a qualified person with a disability that resulted in detention or physical harm is a denial of access or interference with full and equal enjoyment of goods and services and constitutes discrimination pursuant to Title III of the ADA.

72. There are numerous additional common questions of law and fact, including the following:

- (a) whether Wal-Mart's national loss prevention policy sets forth objective nondiscretionary receipt checking standards, and if so, whether application of the standards resulted in the disparate treatment of minority consumers and other protected classes;
- (b) whether Wal-Mart's increasing reliance on part-time employees to perform loss prevention functions resulted in the disparate treatment of minority consumers and other protected classes;

- (c) whether Wal-Mart had actual or constructive knowledge of a pattern or practice of discriminatory treatment by Wal-Mart greeters;
- (d) whether Wal-Mart has a pattern or practice of condoning, encouraging, or rewarding Wal-Mart greeters who successfully catch shoplifters;
- (e) whether Wal-Mart has a pattern or practice of condoning physical assaults by Wal-Mart greeters including physical touching and shopping cart grabbing;
- (f) whether Wal-Mart greeters are trained to apply objective nondiscretionary receipt checking standards;
- (g) whether Wal-Mart greeters who applied *objective* receipt checking standards to nonminority consumers received negative supervisor feedback, including but not limited to verbal constructive feedback;
- (h) whether Wal-Mart greeters who applied *subjective* receipt checking standards to minority consumers and other protected classes received positive supervisor feedback;
- (i) whether Wal-Mart enforces receipt checking differently in stores with a predominantly nonminority consumer base;

- (j) whether Wal-Mart has a nationwide policy requiring its stores to routinely use secret shoppers to identify and remedy consumer racial profiling;
- (k) whether Wal-Mart greeters who perform loss prevention-related acts are required to have the same level of training and experience as other loss prevention employees;
- (l) whether Wal-Mart had actual or constructive knowledge that its loss prevention tactics were a barrier to its goods and services for consumers with a disability;
- (m) whether Wal-Mart's national loss prevention policy imposes unfavorable treatment on minority consumers (and other protected classes) and consumers with a disability by requiring a disproportionate number of them to furnish receipts before exiting the store;
- (n) whether Wal-Mart's national loss prevention policy imposes unfavorable treatment on minority consumers (and other protected classes) and consumers with a disability by coercing them into consenting to detentions, searches, and seizures;
- (o) whether Wal-Mart's national loss prevention policy resulted in a disproportionate number of minority consumers (and other

protected classes) and consumers with a disability being physically assaulted, detained, or searched;

- (p) whether Wal-Mart has a pattern or practice of performing loss prevention-related functions in a discriminatory manner, including more extensive pursuits, more aggressive physical assaults, more comprehensive searches, or longer detentions based on the consumer's race or other impermissible criterion;
- (q) whether Wal-Mart offers less favorable settlement terms or disproportionately fewer settlements to minority consumers (and other protected classes) and consumers with a disability who have been physically assaulted by a Wal-Mart employee;
- (r) whether Wal-Mart employees who perform loss prevention-related functions, including greeters, owe a special duty to consumers arising from their authority to detain;
- (s) whether it is foreseeable that a Wal-Mart employee performing a loss prevention act could pose a risk of serious bodily harm or death to an innocent consumer with a disability;
- (t) whether members of the proposed Class were innocent consumers;
- (u) the types and amounts of damages members of the proposed

Class suffered from Wal-Mart's discriminatory treatment;

- (v) whether Wal-Mart's violations were willful, malicious, outrageous, egregious, purposeful, or in reckless disregard of the likelihood that its conduct could cause serious harm to members of the proposed Class; and
- (w) whether Wal-Mart's national loss prevention policy constitutes a continuing violation.

Typicality

73. Plaintiff's claims are typical of other members of the proposed Class. Plaintiff challenges a nationwide policy, pattern, and practice under which Wal-Mart performs loss prevention-related functions. This policy resulted in the disparate treatment of minority consumers (and other protected classes), reverse discrimination of nonminority consumers, and actual harm or the threat of harm to consumers with a disability. Plaintiff's civil rights were violated in the same manner as other members of the proposed Class who were subjected to Wal-Mart's loss prevention policy.

74. The following minority discriminatory treatment comments were made by potential members of the proposed Class or persons with direct knowledge of potential members and illustrate the typical fact pattern:

- (a) Ashley (Arkansas, circa Feb. 2019): Per Michael Osborne, [Ashley] was treated in an absolutely abhorrent manner when

she was unable to produce the receipt immediately...She was man handled, her purchased items forcefully taken from her. She was further insulted and humiliated, racially discriminated against and when she was able to provide the receipt after a few short moments, the abuse continued.

- (b) Benny Powell (circa Sep. 2018): Two of the three times I went to the same Walmart and was the only black person leaving in a crowd and the only one stopped.
- (c) Carmen Ellis (California, circa Feb. 2019): I was walking out, and they asked me for the receipt. So, I gave it to them...So then when I was coming to the car, then I notice that my husband is coming in to Walmart. So then I went and look for him. And then we walk out, he buy some stuff. And they didn't ask him for the receipt. My husband is white and I'm Hispanic.
- (d) Christine Snyder (Virginia, circa May 2019): I witnessed racial profiling in full effect last night....I was leaving out of the store with my kids father and for those that don't know yes he is black...we were leaving out of Walmart this white couple were in front of us set off the alarm and the door greeter said oh it's ok you can go ahead it goes off sometimes and was laughing...she sees my kids father and asks for his receipt...I just don't get it.
- (e) Cris Sample (Texas, circa May 2019): Racism in America is so real. Racial profiling exists and you don't care about it until it impacts you.... I'm educated and middle class. In fact, I'm working on my MBA. Twice while shopping at the same Walmart...I've been stopped and had my items checked. My items are not just checked but they scan several of my items to verify the items are on my receipt. I did self-checkout and the Caucasian lady on the register next to me walks right past without a fuss. She isn't stopped. In fact four Caucasians go through self check out while they verify barcodes and match them to my receipt. My 4 yr old, blonde hair, blue-eyed daughter doesn't understand why her mommy is stopped but other people that don't look like mommy get to go.
- (f) Danielle Coleman (Virginia, circa May 2019): It happens

whenever I go into Walmart now. I don't like going in there but it's the closest one around.

- (g) Fr3sh-Kush (circa Mar. 2019): [A] few months ago I was at Walmart and the lady was checking receipts and she let this white lady pass with 2 shopping carts and this old guy who had a tv. But the [expletive] wanted to check me?
- (h) Gianna Belsito (circa Sep. 2018): I returned mine too. The receipt checks are random and the checks are racially motivated. If the greeter is white, whites don't get checked. Black greeter? Blacks don't get checked. Hispanic in this case. Hispanics will walk.
- (i) Jasmine Rubin (circa Sep. 2018): [I]t's offensive that a bunch of old bats there think you're stealing because you're brown or black. Almost every other time I go to Walmart with my multiracial boyfriend, we get our receipt checked. I've never been stopped for that when I shop alone. It's irritating and people are getting tired of being treated like thieves because they aren't white.
- (j) JP Parmley (Ohio, circa May 2019): JP and I went to bridge water falls Walmart when leaving out a lady came from no were and wanted JP receipt he gave it to her and my stuff was in the seat part of the cart I told her here is my receipt and she said oh I don't need yours I just need to check his. My feelings is if this was not racial profiling what do you call it?
- (k) Kim Kueen (circa May 2019): [Walmart] racially profile to a point it's ridiculous... They act like I have a fake baby in the car seat and it never fails someone asks to see my baby.
- (l) Kris Aldemir (Ohio, circa Jun. 2018): Do not go to this Walmart off Hard Road and Sawmill. The employees do not check every consumer's receipts. They use racial profiling. They did not check 3 people in front of me and the employee Meera stopped me and asked for my receipt. I asked him why he did not check on others but picked me. He could not answer me.
- (m) Major Reign (circa May 2019): This just happened to me and

my boyfriend the other day it was really upsetting. I am white but my boyfriend is black he was definitely being profiled.

- (n) Manic Anna (Nevada, circa Feb. 2019): I used the automatic check out and just left my receipt in the machine because it was food ... They demanded my receipt I also noticed several people walking out while I was being investigated without being approached at all. It seems if you have any color to your skin you're automatically a suspect.
- (o) Michael Fresh (circa Nov. 2018): Walmart hates dark skin people like the color of Indians and Mexicans I believe they look at me as a Mexican. They've watched me pay for all of my [expletive] so why ask for my receipt.
- (p) Patrick McGlone (circa Sep. 2018): It also depends on who is working at the door. Older white gentleman didn't look at any receipts and told everyone to have a nice day. Lady like this didn't stop any black customers, just the white ones..a black lady greeter let 2 black females walk right past her, but stopped a white lady and said " you need to show me your receipt or I cannot let you leave".
- (q) Qui Scott (Oklahoma, circa Apr. 2018): So I'm at Walmart in Moore and apparently their security thinks that it is okay to racially profile and stop every black person that's leaving asking them for a receipt but not once did he stop and ask a white person for the receipt while I was waiting to get out of the door... So I get ready to walk past this man and he looks at me and goes man do you have your receipt so I give him my receipt and he starts looking at everything in the basket and then checking it off with the highlighter the two white gentleman behind me not once did he ask them for their receipt.
- (r) Ramona Inouye (circa Sep. 2018): My mother who is very white was shocked when we left Walmart and were stopped. When she asked me why they would do that, I told her it was because she was with me (I'm 1/4 Basque so not as light skinned as my mother). I get stopped leaving Walmart almost every time.

- (s) Ricky Davis (circa Dec. 2018): I had an OLD LADY wanting to check my receipt, I walked past her, she put her hand on my shoulder and yanked me around.
- (t) Sara Anderson (Colorado, circa May 2019): We were racially profiled and stopped. [...] As we were exiting, we were stopped... everything was in a bag. But it's fine, she's just "doing her job" right? Nope. She then scanned our box of Swifter Wet Jets on her device, looked at us, and said "how much is this item?" Mind you, she had the receipt in her hand. When I pointed this out, she looked and said "I know, I'm asking you." At this point, we asked for a manager. While I was talking to [the manager], [my friend] was at the front to see if this "loss prevention specialist" was stopping anyone else. As you can guess, she was not.
- (u) Serena K. (circa Dec. 2018): This happens to me all the time. There would be 10 of us leaving, but they pull me aside to check my receipt.
- (v) Sharda Dandridge (Texas, circa May 2019): I stopped going to Walmart because of the "random checks". I used to be understanding thinking that it's just what they do but I started to notice that I was the only one I ever saw get stopped and checked so the last time I asked why were they stopping me but I had counted 15 people (3 with large items what had no bag) but here I was with something less than \$10 and I needed to be checked.
- (w) Shawty (circa Jan. 2018): [P]rime example one day I went into Walmart had everything in the bag I bought as I walked out like I normally do at this time he was helping a customer pushed them out of the way just to get to me ... [because] the old guy...didn't like my boyfriend [because] he had tattoos & was Mexican.
- (x) Stacy B Carrion (circa Jul. 2018): The lady asked me to show her the receipt and I said why they said it was a policy. [There] was a white woman behind me she went right out the door and they didn't ask [expletive] [from her]. Racial Profile.

- (y) Syd's Fit Evolution (Texas, circa Sep. 2018): I myself know for a fact that they don't check everyone's receipts. [...] I'm pretty sure it had something to do with me shopping while black because nothing I did that day in Walmart indicated I was shoplifting.
- (z) Kris Carter (Arkansas, circa May 2019): [S]everal customers ahead of us working our way out of your store were never stopped to be checked which is fine. We got stopped. My friend's receipt and bags were both inspected. I had equivalent amount of purchased merchandise on me as well. After his purchases were inspected, the kind associate right in front of my friend told me I'm good to leave. I wouldn't think anything of it and I'm doubtful your associate has any bad judgment nor intentions. But unfortunately, with my friend being Latino descent and myself being Caucasian, this situation to many can potentially spark racial profiling controversy.

75. The following gender discriminatory treatment comments were made by potential members of the proposed Class or persons with direct knowledge of potential members and illustrate the typical fact pattern:

- (a) Alta Harding (circa Jul. 2018): I showed my receipt each time asked, feeling like I'm suspected of stealing. Finally, I asked why and they said because I have I un-bagged items (usually lg bags of dog food) so the next time I asked for a large bag and got one! Still I was asked for a receipt, I said, "all my items are bagged and I'm not showing my receipt because I'm sick of this."
- (b) Faith Dye (circa 10/2018): I personally don't like it because I get profiled. A lot of people get profiled. A lot of people don't get worried with it all and just walked through the whole cart full of [expletive]. I am sick of "random incidents"...
- (c) Heatherism Watson (North Carolina, circa May 2019): As I walked out ... a woman I worked with was walking out too so we linked up she had a single bag & I had 2 Kids & Drinks. We are Chatting when [the greeter] reaches and jerks my buggy

back with my kid in the front of it.

- (d) Laurie Singer (circa Nov. 2018): I almost ran over a door greeter that I didn't know was behind my car, in the dark, that had followed me out and was both writing my tag # and vehicle description and trying to physically stop me from leaving.
- (e) Lydia Pounds (circa Nov. 2018): I went through self-checkout to pay for a case of water. My daughter was with me also checking out, we were sharing a cart. I could tell the man in front of me was not about to let me go without producing a receipt for this \$4 case of water. after finding it he took both of our receipts and we had to stand there while he went through every item on each receipt and matched it with every item in our cart.
- (f) V. Hinton (circa Sep. 2018): If Walmart consistently asked for receipts from everyone I would oblige but they pick and choose who to ask for a receipt. You didn't ask the couple before me so I keep walking...So to me it feels discriminatory.

76. The following reverse discriminatory treatment comments were made by potential members of the proposed Class or persons with direct knowledge of potential members and illustrate the typical fact pattern:

- (a) Amnesia Iforget (circa Sep. 2018): [W]hen I go to neighborhoods without white people they check me.
- (b) Fender Strat (circa May 2019): This only happens to me when shopping in black neighborhoods.
- (c) George Madis (circa 10/2018): About a month ago I watched a black man walk right past the black man who was the door greeter without being stopped for the bag of dog food he was carrying, a few seconds later he stopped me for a bag of dog food.
- (d) Jeff Atkinson (circa Sep. 2018): At the only Walmart in my town there is a black man checking receipts and I have noticed he checks every white person but lets black people walk out the

door.

- (e) Krisdaan 1 (circa Dec. 2018): I do not show my receipt either [...] They have come to my car several times after I refused. But every time they're looking right at me as I'm leaving the register and as soon as I get to them, I am the only white guy in proximity they will ask me for a receipt.
- (f) Mary Ann Jesuino (circa Dec. 2018): The Walmart where I shop is so racist. I'm White and they always asked for my receipt while African-Americans and Spanish are walking out with no problem.
- (g) Patrick Furlicker (circa 10/2018): I had a greeter say stop when I and others walked out not knowing he was talking to me. I was almost to my vehicle when this guy grabs me and escorts me back into the store. I was white and the security was black.
- (h) Roy King (Virginia, circa Sep. 2018): In Manassas Virginia the Arabs at the door stop every white person walking out.
- (i) Stacy Pappas (circa Apr. 2019): I saw a white man detained at Wal-Mart by three black employees, I'm pretty sure he was racially profiled as he didn't steal anything.
- (j) Tactical Michael (circa Sep. 2018): I was racially profiled today at Walmart I called them and they didn't even think anything about it.

77. The following disability discriminatory treatment comments were made by potential members of the proposed Class or persons with direct knowledge of potential members and illustrate the typical fact pattern:

- (a) Ashley Lynn (Florida, circa May 2019): [Wal-Mart greeter named] Jake and older man Dale refused to let cart of food be taken out. Mind you my special needs son was having a meltdown B.C. he was so overwhelmed ... Also this was AFTER the manager said let him go with cart. They refused and didn't listen.

- (b) DK Dempcey Knight DK (circa Apr. 2019): I know I look ragged normally because I live in pain, so after a long, hard walk about Wally Wack-a-Do I don't like to be harassed at the damn door for my receipt. All I want to do is get in my car and off my feet. But they always seem to stop me for a receipt! [...] He even grabbed the cart I was using with my bought property in it.
- (c) J Lu (circa Sep. 2018): [Wal-Mart Greeter] put her hands on me and I am disabled and I pulled my disabled arm from her and I told her touch me again and I will take my good arm and I will shove it down your [expletive] throat.
- (d) Joe Sar (circa May 2019): Last time me and my beautiful wife went to Walmart this Walmart receipt checker a younger guy said he will literally put his hands on me to stop me and I said youngin I'm a retired firefighter with osteoarthritis in my middle back and my middle back is always in chronic pain [...] I guess his teenage hormones got the best of him as soon as he laid his hands on me I turned around [...] and broke his nose.

Adequacy

78. Plaintiff will fairly and adequately protect the interests of other members of the proposed Class. Plaintiff is aware of no conflict with any other member of the proposed Class. Plaintiff understands his obligations as a class representative, has already undertaken steps to fulfill them, and is prepared to continue to fulfill his duties as class representative.

79. Wal-Mart has no unique defenses against Plaintiff that would interfere with Plaintiff's representation of the Class.

80. Plaintiff is a licensed attorney with class action-related experience, including discovery, document production, and claims administration. Plaintiff has

worked on well-known class action settlements, including:

- (a) *In re: National Football League Players' Concussion Injury Litigation*, MDL Docket No. 2323 (E.D. Pa.).
- (b) *In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico*, on April 20, 2010, MDL Docket No. 2179 (E.D. La.).
- (c) *In re: Black Farmers Discrimination Litigation Settlement*, No. 08-mc-0511 PLF (D.D.C.).

81. Shane gained claims administration experience at BrownGreer PLC, an innovative firm specializing in claims administration and litigation management. In this capacity, Shane became an expert at managing class action-related processes.

Rule 23(b)(3)

82. This action is properly maintainable as a class action under Rule 23(b)(3) of the Federal Rules of Civil Procedure.

83. The questions of law and fact common to the members of the Class predominate over questions affecting individual members, and a class action is superior to other available methods for the fair and efficient resolution of this controversy.

84. By resolving the common issues described above in a single class proceeding, each member of the proposed Class will receive a determination of whether Wal-Mart's loss prevention policy, pattern, and practice of consumer racial profiling violated Title II of the Civil Rights Act of 1964, and whether Wal-Mart's

loss prevention-related acts that detained or physically harmed innocent consumers with a disability violated Title III of the ADA.

85. Furthermore, because Wal-Mart had a single, nationwide policy, pattern, and practice, concentrating the litigation in a single district will enable all members of the proposed Class to obtain a single determination of the merits of their claims against Wal-Mart.

86. There are no difficulties in managing this case as a class action.

**VI.
JURY DEMAND**

87. Plaintiff hereby demands a trial by jury on all issues raised herein.

**VII.
PRAYER FOR RELIEF DEMAND**

WHEREFORE, Plaintiff prays that this Court:

- A. Certify the class described above under Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure, designate Shane as representative of the Class, and designate Shane as Class Counsel for the Class.
- B. Grant declaratory judgment that Wal-Mart engaged in consumer racial profiling and violated Title II of the Civil Rights Act of 1964, 42 U.S.C. § 2000a et seq.
- C. Grant declaratory judgment that Wal-Mart's loss prevention acts and practices posed an inequitable and unreasonable risk of serious bodily harm or

death to innocent consumers with disabilities, were a denial of reasonable accommodation, denial of access, or interference with full and equal enjoyment of goods and services offered by Wal-Mart and violated Title III of the ADA, 42 U.S.C. § 12101 et seq.

D. Grant injunction requiring Wal-Mart to implement long-term abatement strategy, including nationwide counter-measures designed to (1) eliminate consumer racial profiling by all employees performing loss prevention-related acts, and (2) eliminate the risk of physical harm or death to consumers with a disability resulting from Wal-Mart's loss prevention acts.

E. Grant injunction prohibiting Wal-Mart from delegating any loss prevention-related duty to greeters and similar positions.

F. Grant injunction requiring Wal-Mart to provide comprehensive assistance to consumer victims who are detained or assaulted by a Wal-Mart employee, including (1) offering consumer a copy of a written incident report memorializing the wrongful detention incident, (2) notifying consumer of potential right to money damages against Wal-Mart, and (3) providing consumer with the contact information of at least five local attorneys who may assist the consumer.

G. Grant injunction requiring Wal-Mart to, upon verbal or written request, provide consumer victims with all surveillance videos within its custody or control depicting the incident, including the events transpiring before and after

the loss prevention act occurred, at no cost.

H. Award compensatory damages that Plaintiff and members of the proposed Class have sustained as a result of Wal-Mart's discriminatory conduct, including but not limited to damages for assault, battery, conversion, defamation, false imprisonment, harassment, negligence, medical expenses, and emotional distress, in an amount to be determined at trial but at least in an amount in excess of **\$2,100,000,000.00** (TWO BILLION ONE HUNDRED MILLION DOLLARS);

I. Award punitive damages in an amount commensurate with Wal-Mart's ability to pay and to deter future conduct;

J. Award pre-judgment and post-judgment interest, as provided by law;

K. Costs incurred, including reasonable attorneys' fees, to the extent allowable by law; and

L. Grant such other relief as is just and appropriate.


Respectfully Submitted,



Shane M. Jenkins, Esq. (VBN 76882)
124 Ridgecrest Drive
Suffolk, Virginia 23434
Telephone: (757) 619-5946
Facsimile: (703) 229-0524
jenkins@jenklaw.com

CERTIFICATE OF MAILING

I hereby certify that a true copy of the foregoing Complaint was sent via first class mail to CT Corporation Systems, 4701 Cox Rd Ste 285, Glen Allen, VA 23060-6808), this 16 day of May, 2019.

By: 
Shane M. Jenkins, Esq. (VBN 76882)
124 Ridgecrest Drive
Suffolk, Virginia 23434
Telephone: (757) 619-5946
Facsimile: (703) 229-0524
jenkins@jenklaw.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

SHANE M. JENKINS, ESQ., on behalf of
himself and others similarly situated

Plaintiff(s),

v.

Civil Action Number: 2:19cv271

WAL-MART STORES, INC.

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of CLASS ACTION COMPLAINT.
(Title of Document)

SHANE M. JENKINS

Name of *Pro Se* Party (Print or Type)



Signature of *Pro Se* Party

Executed on: 5-23-2014 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)
Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)

JS 44 (Rev. 02/19)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

<p>I. (a) PLAINTIFFS JENKINS, SHANE M</p> <p>(b) County of Residence of First Listed Plaintiff <u>SUFFOLK, VA</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i></p>	<p>DEFENDANTS WAL-MART STORES, INC.</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p>
---	---

<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i> <i>(For Diversity Cases Only)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. NATURE OF SUIT *(Place an "X" in One Box Only)* Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES		
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	
<p>REAL PROPERTY</p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>CIVIL RIGHTS</p> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<p>LABOR</p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark	<p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

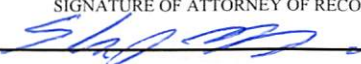
Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
 Title II Civil Rights Act of 1964, 42 U.S.C. § 2000a; Title III Americans with Disabilities Act, 42 U.S.C. § 1210

Brief description of cause:
 Widespread consumer racial profiling by Wal-Mart employees resulting in discriminatory treatment.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 2,100,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE _____ SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Court Name: United States District Court
Division: 2
Receipt Number: 24683042226
Cashier ID: tgamborg
Transaction Date: 05/23/2019
Payer Name: SHANE W JENKINS

CIVIL FILING FEE
For: SHANE W JENKINS
Case/Party: D-VRE-2-19-CV-00271-001
Amount: \$400.00

CHECK
Check/Money Order Num: 7113
Amt Tendered: \$400.00

Total Due: \$400.00
Total Tendered: \$400.00
Change Amt: \$0.00

SHANE W JENKINS
CIVIL FILING FEE
2:19cv271

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Walmart Hit with Discrimination Class Action Over Alleged Loss-Prevention Efforts](#)
