

Plaintiff seeks compensation damages, equitable and other relief available under the FLSA, as amended, 29 U.S.C. § 201 et seq. (COUNT II).

3. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 as this is a civil action and Plaintiff's claims arise under laws of the United States.

4. Plaintiff has complied with all conditions precedent to the filing of her claims pursuant to 42 U.S.C. § 2000e (5), to wit: she filed a charge of discrimination with the Equal Employment Opportunity Commission ("EEOC") within 300 days of the unlawful employment practice [Attached as Ex. 1]. The EEOC issued Plaintiff a Notice of the Right to Sue [Attached as Ex. 2], and this action was commenced within 90 days of receipt of the EEOC's Notices of the Right to Sue.

5. Venue is proper pursuant to 28 U.S.C. § 1391(b) as a substantial part of the events giving rise to this action occurred within this District and Defendants are either located, reside, or do business in this District.

6. Plaintiff is a resident of Sumner County, Tennessee and was employed as a non-exempt employee of Defendants at its Hendersonville location from her initial hire date through her unlawful termination on or about February 23, 2016.

7. Plaintiff worked at the Low T Center located at 1531 Hunt Club Blvd Suite 320 Gallatin, Tennessee 37066.

8. Defendant LTCI is a corporation with its principal office at 1920 East State Highway 114, Southlake, Texas 76092. LTCI does business as The Low-T Center. LTCI is not registered to do business in the State of Tennessee but operates in the State as Low-T Center or Low-T Centers. Its registered agent for service of process in Texas is Moraine & Associates, P.L.L.C., 60 Village Lane, Suite 110, Colleyville, TX 76034. At all times relevant hereto, LTCI was

Plaintiff's employer, as well as the employer of hundreds of other employees at its 47 or more centers across the United States.

9. LTCLLC is a limited liability company with its principal office at 1920 East State Highway 114, Southlake, Texas 76092. LTCLLC is not licensed to do business in the State of Tennessee but operates and does business within the State as The Low-T Center or Low-T Centers. Its registered agent for service of process in Texas is The Moraine Firm, 60 Village Lane, Suite 110, Colleyville, TX 76034. At all times relevant hereto, LTCLLC was Plaintiff's employer, as well as the employer of hundreds of other employees at its 47 or more centers across the United States.

10. LTPS is a professional limited liability company with its principal office at 1920 East State Highway 114 Southlake, Texas 76092-6510. LTPS is not registered to do business in the State of Tennessee but nevertheless does business in Tennessee as The Low-T Center or Low-T Centers. Its registered agent for service of process in Texas is The Moraine Firm, 60 Village Lane Suite 110, Colleyville, TX 76034. At all times relevant hereto, LTPS was Plaintiff's employer, as well as the employer of hundreds of other employees at its 47 or more centers across the United States.

11. LTCT is a limited liability company with its principal office at 1901 John McCain Road, Suite H, Colleyville, Texas 76034-7302. Its registered agent for service of process is Northwest Registered Agent Inc., 5810 Shelby Oaks Drive, Suite B, Memphis, Tennessee 38134-7315. LTCT does business as The Low T Center. At all times relevant hereto, LTCT was Plaintiff's employer, as well as the employer of hundreds of other employees at its 47 or more centers across the United States.

12. LTSS is a Texas limited liability company registered to do business in the state of Tennessee. Its principal office is located at 1901 John McCain Road, Suite H, Colleyville, Texas 76034-7302. Its registered agent for service of process is Northwest Registered Agent Inc., 5810 Shelby Oaks Drive, Suite B Memphis, Tennessee 38134-7315. LTSS does business as The Low-T Center (“Low T Center”). At all times relevant hereto, LTSS was Plaintiff’s employer, as well as the employer of hundreds of other employees at its 47 or more centers across the United States.

13. At all times relevant hereto, Defendants have each been an “employer” within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*

14. At all times relevant hereto, Plaintiff has been an “employee” within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*

15. At all times relevant hereto, acts in violation of federal law were committed by Defendants and their employees within the Middle District of Tennessee.

16. Upon information and belief, all of the Defendants have interrelated operations, share common management, have centralized control of labor relations and have common ownership and/or financial control such that they are all integrated enterprises for purposes of aggregating employees and for purposes of liability.

17. Plaintiff was subjected to daily discrimination and harassment during the time she worked for the Defendants. She and other female workers at The Low T Center were treated less favorably than male employees and were subjected to discriminatory and harassing behavior on a regular basis.

18. Shortly after Defendants hired Ken Henry to work at their Hendersonville location, Henry began to make inappropriate sexual comments to and to otherwise sexually harass Plaintiff and other female employees.

19. Henry also made inappropriate sexual comments to patients.

20. Plaintiff repeatedly complained to Henry, who was her supervisor on site.

21. Plaintiff also repeatedly complained about Henry's sexual harassment to her boss, Susan Gibbons, who worked out of the Defendants' Brentwood, Tennessee location.

22. Rather than remedy the situation, Henry communicated to Plaintiff and the other female staff members that complaints must be lodged solely with him.

23. Henry and Defendants retaliated against Plaintiff for complaining about Henry's inappropriate behavior by disciplining her and terminating her employment.

COUNT I – ULAWFUL EMPLOYMENT PRACTICES IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 (42 U.S.C. §§ 2000e *et seq.*)

24. Plaintiff restates and incorporates herein the foregoing paragraphs.

25. Plaintiff was an "employee" as defined by Title VII.¹

26. Defendants were each an "employer" as defined by Title VII.²

27. Plaintiff was subjected to a continuing and on-going campaign of harassment and discrimination in the workplace by Henry and other of Defendants employees because she was female and because she complained about sexual harassment and discrimination, in violation of 42 U.S.C. §§ 2000e *et seq.* ("Title VII").

28. When Plaintiff reported, objected to, and/or protested sexual harassment and discrimination, she was subjected to humiliation and retaliation. When she further complained about that treatment her employment was terminated.

29. Defendants failed to remedy and/or prevent harassment/discrimination on the basis of sex or gender.

¹ See, 42 U.S.C. § 2000e (f).

² See, 42 U.S.C. § 2000e (b).

30. Defendants are vicariously liable for the harassment and discrimination perpetrated by Henry.

31. Plaintiff was subjected to adverse employment actions, including but not limited to, a sexually hostile work environment, discipline and termination of her employment in violation of Title VII.

32. Defendants conduct as described in this Complaint was willful and malicious or recklessly indifferent to Plaintiff's federally protected rights, entitling her to liquidated and punitive damages.

33. As a direct and proximate result of Defendants' unlawful acts, Plaintiff has suffered and continues to suffer lost income and other privileges and benefits of employment; suffered and continues to suffer embarrassment, humiliation, emotional distress and mental anguish, anxiety, inconvenience, and loss of enjoyment of life; and has incurred and continues to incur attorneys' fees, costs and litigation expenses.

COUNT II – VIOLATIONS OF THE FLSA

34. At all times material herein, Plaintiff has been employed by Defendants in hourly, non-exempt positions.

35. Plaintiff brings this action as a collective action on behalf of herself and all others similarly situated in accordance with 29 U.S.C. § 216(b).

36. Each Defendant is an "employer" within the meaning of 29 U.S.C. §203(d) and a "person" within the meaning of 29 U.S.C. § 203(a).

37. At all times material to this action, each Defendant has been an enterprise engaged in commerce as defined by 29 U.S.C. § 203(r)(1), and its annual dollar business volume has exceeded \$500,000.

38. At all times material herein, each Defendant has been actively conducting business in the State of Tennessee.

39. At all times material herein, Plaintiff has been entitled to the rights, protections, and benefits provided under the FLSA, 29 U.S.C. § 201 et seq.

40. At all times material herein, Plaintiff has worked in excess of the hourly levels specified in the FLSA, 29 U.S.C. § 207. As a result, at all times material herein, Plaintiff has been entitled to overtime compensation at a rate of not less than one and one-half times her regular rate of pay for the hours of overtime she has worked.

41. 29 U.S.C. § 207(a)(1) provides that employees shall be paid overtime compensation at a rate of not less than one and one-half times their regular rate of pay for hours worked in excess of 40 hours per work week. Defendants have violated, and continue to violate, 29 U.S.C. § 207(a)(1) by failing and refusing to compensate Plaintiff and other similarly situated non-exempt employees for their hours worked in excess of 40 hours per work week at a rate of not less than one and one-half times the regular rate at which the Plaintiff and those similarly situated are employed.

42. Defendants have deprived Plaintiff and other similarly situated employees of overtime compensation by failing to compensate them for the time that they spend engaged in unrecorded, off the clock work, designed to market or increase the patient count of Defendants' Low T Centers. These activities include but are not limited to: setting up booths at various events, answering emails and telephone calls from prospective patients or their spouses, and taking other actions to assist in increasing the sales or the patient counts at Defendants' facilities.

43. Defendants knew or reasonably should have known that Plaintiff and other similarly situated employees were engaged in these unrecorded and unpaid activities.

44. Such unrecorded and unpaid activities are compensable.

45. Defendant has also deprived the Plaintiffs and other similarly situated employees of overtime compensation mandated under the FLSA by miscalculating the regular rate of pay at which overtime is paid. Defendant has failed to include all compensation paid to Plaintiff, and other similarly situated employees, in their regular rates of pay for purposes of calculating FLSA overtime compensation.

46. The forms of compensation excluded from the regular rate of pay are forms of compensation that must be included in the regular rate of pay at which overtime is paid under section 207(a) of the Fair Labor Standards Act, 29 U.S.C. § 207(a).

47. Defendants' failure to include these payments in Plaintiffs' regular rates of pay violate section 207(a) of the Fair Labor Standards Act, 29 U.S.C. § 207(a).

48. Defendants' violations of the FLSA as alleged herein have been done in a willful and bad faith manner.

49. As a result of the aforesaid willful violations of the FLSA, overtime compensation has been unlawfully withheld by Defendants from Plaintiff and other similarly situated persons for which Defendant is liable pursuant to 29 U.S.C. § 216(b), together with an additional equal amount as liquidated damages, as well as interest, reasonable attorneys' fees and the costs of this action.

50. The employment and work records for Plaintiff are in the exclusive possession, custody, and control of Defendants, and Plaintiff is unable to state at this time the exact amount she is owed. Defendants are under a duty imposed by 29 U.S.C. § 211(c) and the regulations of the U.S. Department of Labor to maintain and preserve Plaintiff's, and other similarly situated

employees', payroll and other employment records from which the amounts of the Defendants' liability can be ascertained.

51. Because Defendants did not maintain records of the off the clock work performed by Plaintiff and other similarly situated employees, Plaintiff may prove her hours worked by just and reasonable inference.

RELIEF REQUESTED

WHEREFORE, premises considered, Plaintiff pursuant to Title VII of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000e et seq.) and 29 U.S.C. § 216(b), prays for the following relief:

WHEREFORE, premises considered, the named, representative Plaintiff, pursuant to 29 U.S.C. § 216(b), prays for the following relief:

1. that process issue against Defendant and that Defendant be required to answer within the time period provided by applicable law;
2. Back pay and damages for lost benefits for violations of Title VII;
3. Front pay and damages for lost benefits for violations of Title VII;
4. Compensatory damages for violations of Title VII;
5. Punitive damages for violations of Title VII;
6. Liquidated damages for violations of Title VII and/or the FLSA;
7. Attorneys' fees, costs and expenses for violations of Title VII and/or the FLSA;
8. Prejudgment interest and, if applicable, post-judgment interest for violations of Title VII and/or the FLSA;
9. an order permitting this litigation to proceed as a collective action pursuant to 29 U.S.C. § 216(b);

10. prompt notice of this litigation, pursuant to 29 U.S.C. § 216(b) to all potential members of the Collective Class;
11. a declaration that Defendants have violated the FLSA;
12. a declaration that Defendants' violation of the FLSA was willful;
13. that Plaintiff, and all others who file consents, be awarded damages in the amount of their unpaid wages, and an additional equal amount as liquidated damages pursuant to 29 U.S.C. § 216(b), and/or prejudgment interest;
14. that Plaintiff and those similarly situated be granted such other, further and general relief to which she or they may be may be entitled; and,
15. that a jury be impaneled to hear this cause of action at trial.

Respectfully submitted,

/s/ Charles P. Yezbak, III
CHARLES P. YEZBAK, III (#18965)
Yezbak Law Offices PLLC
Attorney for Plaintiff
2002 Richard Jones Road, Suite B-200
Nashville, Tennessee 37215
(615) 250-2000
(615) 250-2020 Facsimile
yezbak@yezbaklaw.com

EXHIBIT 1

EXHIBIT 2

NOTICE OF RIGHT TO SUE
(CONCILIATION FAILURE)

To: **Angelica M. Lozano**
104 Fairways Dr.
Hendersonville, TN 37075

From: **Memphis District Office**
1407 Union Avenue
Suite 900
Memphis, TN 38104



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
494-2016-00953	Erica S. Diggs, Investigator	(615) 736-5866

TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Delner Franklin-Thomas,
District Director

MAY 03 2018

(Date Mailed)

Enclosures(s)

CC: **David J. Moraine**
General Counsel
Low T Center
1920 East Highway 114
Southlake, TX 76092

Benjamin Goldammer
Kay Griffin Enkema & Colbert
222 Second Avenue North
Suite 340-M
Nashville, TN 37201

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10 – not 12/1/10** -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

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.)

I. (a) PLAINTIFFS
 Angelica Lozano
 on behalf of herself and)
 all other similarly situated employees,
 (b) County of Residence of First Listed Plaintiff Sumner
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Charles P. Yezbak, III; Yezbak Law Offices PLLC
 2002 Richard Jones Rd Suite B-200
 Nashville, TN 37215 615-250-2000

DEFENDANTS
 Low T Centers, Inc., Low T Center LLC, Low-T Physicians Services P.L.L.C., Low-T Shared Services, LLC, Low-T Venter of Tennessee JV, LLC
 County of Residence of First Listed Defendant Sumner
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff
 3 Federal Question (U.S. Government Not a Party)
 2 U.S. Government Defendant
 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	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)

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	PERSONAL INJURY <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	PERSONAL INJURY <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 PERSONAL PROPERTY <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 LABOR <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 IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <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)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<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"/> 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

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):
42 U.S.C. § 2000e et seq., 29 U.S.C. § 216(b)

Brief description of cause:
Unlawful discrimination, harrassment, and retaliation. Recovery of unpaid wages under the FLSA.

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

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

DATE: 07/24/2018 SIGNATURE OF ATTORNEY OF RECORD: s/ Charles P. Yezbak, III

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Lawsuit Alleges Female Low-T Center Employees Were Subject to 'Daily Discrimination,' Harassment](#)
