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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ANGELICA HERNANDEZ VASQUEZ, an Individual;

Plaintiff,

v.

KYLIE JENNER, INC., a California Corporation; TRI STAR SERVICES LLC, a Limited Liability Company; LA MAISON FAMILY SERVICES LLC, a Limited Liability Company; KYLIE JENNER, an Individual; and DOES 1 through 25, Inclusive,

Defendants.

CASE NO. 26STCV12609

COMPLAINT FOR:

1. **NATIONAL ORIGIN DISCRIMINATION (Gov. Code § 12940(a));**
2. **NATIONAL ORIGIN HARASSMENT (Gov. Code § 12940(j));**
3. **RACE DISCRIMINATION (Gov. Code § 12940(a));**
4. **RACE HARASSMENT (Gov. Code § 12940(j));**
5. **RELIGION DISCRIMINATION (Gov. Code § 12940(a));**
6. **RELIGION HARASSMENT (Gov. Code § 12940(j));**
7. **DISABILITY DISCRIMINATION (Gov. Code § 12940(a));**
8. **DISABILITY HARASSMENT (Gov. Code § 12940(j));**
9. **FAILURE TO PROVIDE REASONABLE ACCOMMODATION (Gov. Code § 12940(m));**
10. **FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS (Gov. Code § 12940(n));**
11. **RETALIATION (Gov. Code § 12940(h));**

12. FAILURE TO PREVENT DISCRIMINATION, HARASSMENT, AND RETALIATION (Gov. Code § 12940(k));
13. WHISTLEBLOWER RETALIATION (Labor Code § 1102.5);
14. CONSTRUCTIVE WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY;
15. FAILURE TO PAY MINIMUM AND STRAIGHT-TIME WAGES;
16. FAILURE TO PAY OVERTIME COMPENSATION;
17. FAILURE TO PROVIDE MEAL PERIODS;
18. FAILURE TO PROVIDE REST PERIODS;
19. FAILURE TO PROVIDE ACCURATE ITEMIZED WAGE STATEMENTS (Lab. Code § 226);
20. WAITING TIME PENALTIES (Lab. Code § 203);
21. FAILURE TO PROVIDE PAID SICK LEAVE (Labor Code §§ 233–234, 246);
22. FAILURE TO REIMBURSE BUSINESS EXPENSES (Labor Code § 2802);
23. UNFAIR COMPETITION (Bus. & Prof. Code § 17200);
24. WRONGFUL TERMINATION;
25. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS; AND
26. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS.

DEMAND FOR JURY TRIAL

Plaintiff Angelica Hernandez Vasquez, by and through counsel, claims and alleges as follows:

PARTIES

1. Plaintiff Angelica Hernandez Vasquez (hereinafter "Plaintiff") is a female individual who, at all times relevant to this action, resided in the County of Los Angeles, State of California.

2. Plaintiff is informed, believes, and thereupon alleges that Defendant KYLIE JENNER, INC. (hereinafter "Defendant KYLIE JENNER, INC.") is a California Corporation, lawfully doing substantial business in the County of Los Angeles, State of California, and was Plaintiff's employer at all times relevant herein.

3. Plaintiff is informed and believes, and thereupon alleges, that Defendant KYLIE JENNER (hereinafter "Defendant Jenner") is the owner of Defendant KYLIE JENNER, INC. and, based upon information and belief, is a resident of Los Angeles, State of California, at all times relevant herein.

4. Plaintiff is informed, believes, and thereupon alleges that Defendant TRI STAR SERVICES LLC (hereinafter "Defendant Tri Star") is a Limited Liability Company authorized to do and doing business in the State of California, with operations in the County of Los Angeles. Plaintiff is informed and believes, and thereupon alleges, that at all times relevant herein, Defendant Tri Star acted as a co-employer and/or joint employer of Plaintiff, participated in the management, direction, and control of Plaintiff's employment, and was involved in the terms, conditions, and privileges of Plaintiff's employment, including but not limited to the staffing, scheduling, compensation, and direction of Plaintiff's work at Defendants' residences. As a co-employer and/or joint employer, Defendant Tri Star bears joint and several liability for the unlawful acts and omissions alleged herein.

5. Plaintiff is informed, believes, and thereupon alleges that Defendant LA MAISON FAMILY SERVICES LLC (hereinafter "Defendant La Maison") is a Limited Liability Company authorized to do and doing business in the State of California, with operations in the County of Los Angeles. Plaintiff is informed and believes, and thereupon alleges, that at all times relevant herein, Defendant La Maison acted as a co-employer and/or joint employer of Plaintiff, participated in the management, direction, and control of Plaintiff's employment, and was involved in the terms, conditions, and privileges of Plaintiff's employment, including but not limited to the staffing, scheduling, compensation, and direction of Plaintiff's work at Defendants' residences. As a co-employer and/or joint employer, Defendant La Maison bears joint and several liability for the unlawful acts and omissions alleged herein.

6. Plaintiff is ignorant of the true names and capacities, whether individual, corporate, associate, or otherwise, of the Defendants sued herein under fictitious names Does 1 through 25, inclusive, and for that reason sues said Defendants, and each of them, by such fictitious names. Plaintiff is informed, believes, and thereupon alleges that each of the Defendant Does 1 through 25, inclusive, is and was in some manner responsible for, participated in, or contributed to the matters and things of which Plaintiff complains herein, and in some fashion, has legal responsibility therefor. When Plaintiff ascertains the names and capacities of the fictitiously named Defendant Does 1 through 25, inclusive, Plaintiff will seek leave to amend this Complaint to set forth such facts.

7. Plaintiff is informed, believes, and thereupon alleges that each Defendant is, and at all times relevant herein was, the agent of his, her, or its co-defendants, and in committing the acts alleged herein, was acting within the scope of his, her, or its authority as such agent, and with the knowledge, permission, and consent of his, her, or its co-defendants. Defendants KYLIE JENNER, INC., Tri Star, and La Maison, and each of them, were at all relevant times integrated enterprises and/or joint employers of Plaintiff, sharing or co-determining the essential terms and conditions of Plaintiff's employment, including hiring, assignment, supervision, discipline, wage-setting, scheduling, and termination.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this action pursuant to the California Constitution and California statutory and common law, including but not limited to the California Fair Employment and Housing Act (California Government Code section 12900 et seq.) and the California Labor Code.

9. Venue is proper in this Court pursuant to Code of Civil Procedure § 395(a) because the acts and omissions giving rise to this action occurred in the County of Los Angeles, State of California, where Defendants conducted business and where Plaintiff was employed by Kylie Jenner, Inc.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

10. Plaintiff has complied with all administrative prerequisites under the Fair Employment and Housing Act. Plaintiff filed a timely complaint with the California Civil Rights Department (formerly the Department of Fair Employment and Housing) and received a Right-to-Sue Notice. This action is filed within the statutory time limits.

FACTUAL ALLEGATIONS

11. By this reference, Plaintiff alleges and incorporates herein each and every allegation set forth in all previous paragraphs of the Complaint.

12. On or about September 10, 2024, Plaintiff began her employment with Defendant KYLIE JENNER, INC. as a housekeeper at Defendant Jenner's Beverly Hills residence.

13. On or about September 17, 2024, Plaintiff was reassigned to Defendants' Hidden Hills residence, where she reported to supervisory employees, including Patsy (Head Housekeeper) and Elsi.

14. From her first day at the Hidden Hills residence, Plaintiff was treated with hostility and exclusion. Patsy questioned Plaintiff's presence, forced her to wait with a security guard, and made clear that Plaintiff was not welcome.

15. Throughout her employment, Plaintiff was subjected to severe and pervasive harassment by Defendants' agents, including Patsy and Elsi.

16. Plaintiff was routinely:

- Assigned the most difficult and undesirable tasks;
- Excluded from the housekeeping team;
- Publicly belittled and humiliated in front of coworkers due to her race, national origin and religion; and
- Subjected to intimidation and demeaning treatment.

17. Supervisors snapped their fingers at Plaintiff, shouted at her, falsely accused her of misconduct, and treated her in a demeaning and degrading manner.

18. On multiple occasions, supervisors demanded to inspect Plaintiff's phone, accused her of speaking negatively about them, and berated her even when she was following instructions.

19. This conduct was continuous and created a toxic and abusive work environment.

20. Plaintiff is a Salvadoran woman and a practicing Catholic.

21. Defendants, through their agents, made repeated discriminatory and derogatory comments targeting Plaintiff's:

- National origin;
- Religion; and
- Immigration status.

22. Defendants' agents made statements including, but not limited to:

- "Catholics are horrible people," directed at Plaintiff;
- Remarks implying that workers of similar background had been deported; and
- Statements emphasizing their own U.S. citizenship while mocking or intimidating Plaintiff regarding immigration status.

23. These statements were made in Plaintiff's presence and were intended to demean, intimidate, and assert power over her.

24. Plaintiff was also mocked for her accent and treated as inferior because of her Salvadoran background.

25. Plaintiff was the only Salvadoran housekeeper, further isolating her and making her a target of discriminatory treatment.

26. Plaintiff repeatedly complained to supervisors, including Laura and Itzel, regarding the harassment and discriminatory treatment.

27. Plaintiff reported that Patsy and Elsi:

- Forced her to perform their work;
- Told her to leave if she did not like the treatment; and
- Engaged in ongoing abusive conduct.

28. Defendants failed to take any meaningful corrective action.

29. Instead, Plaintiff's complaints were dismissed, mocked, or ignored, and the harassment continued unabated.

30. At a meeting following Thanksgiving 2024, Plaintiff again raised her concerns.

Rather than addressing the issues:

- Patsy and Elsi mocked and interrupted her; and
- No remedial action was taken by any supervisors who witnessed this.

31. Plaintiff later learned the meeting had been secretly recorded without her consent.

32. After Plaintiff complained, Defendants escalated their mistreatment of her.

33. Retaliatory conduct included:

- Increased workload;
- Reduction of scheduled hours;
- False accusations and disciplinary warnings;
- Continued public humiliation; and
- Hostile verbal and physical conduct.

34. When Plaintiff complained again, things got violent for her. On or about March 29, 2025, a supervisor threw hangers at Plaintiff's feet while reprimanding her.

35. Plaintiff was also subjected to threats regarding pay, including statements that she would not be paid if work was not completed.

36. Plaintiff reasonably believed these actions were taken in retaliation for her protected complaints.

37. Throughout her employment, Defendants engaged in systematic wage and hour violations, including:

- Failure to pay all wages earned;
- Late and missing pay for extended periods;
- Failure to pay overtime;
- Failure to provide meal and rest periods;
- Failure to provide accurate wage statements; and
- Failure to reimburse business expenses.

38. Plaintiff was required to perform work outside her job duties, including cleaning additional residences, without compensation or reimbursement.

39. As a result of Defendants' conduct, Plaintiff developed anxiety, severe stress, and

symptoms consistent with post-traumatic stress disorder.

40. Defendants were aware of Plaintiff's condition and her need for medical leave.

41. Plaintiff took medical leave in or about July 2025.

42. Defendants failed to:

- Engage in any interactive process; or
- Provide reasonable accommodations.

43. Upon her return, the hostile conditions continued.

44. By August 2025, the working conditions had become intolerable.

45. Plaintiff reasonably believed she had no choice but to resign.

46. On August 4, 2025, Plaintiff resigned due to the ongoing harassment, discrimination, retaliation, and unlawful working conditions.

47. Defendants failed to respond to her resignation.

48. Plaintiff's resignation constitutes a constructive termination.

49. As a direct result of Defendants' conduct, Plaintiff suffered:

- Emotional distress;
- Anxiety and PTSD symptoms;
- Loss of wages; and
- Other economic and non-economic damages.

50. Defendants' conduct was part of a pattern and practice of:

- Discrimination;
- Retaliation;
- Wage violations; and
- Disregard for employee rights.

51. Defendants acted willfully, maliciously, and with conscious disregard for Plaintiff's rights, entitling Plaintiff to punitive damages.

52. At all relevant times, Defendants maintained uniform policies and practices that violated the California Labor Code.

53. These unlawful policies and practices were applied not only to Plaintiff, but to other

non-exempt employees working for Defendants in similar positions, including housekeepers and domestic staff.

54. Defendants' unlawful policies and practices included, but were not limited to:

- Failing to pay all wages earned;
- Failing to pay overtime compensation;
- Failing to provide legally compliant meal periods;
- Failing to provide legally compliant rest periods;
- Failing to provide accurate itemized wage statements;
- Failing to reimburse business expenses; and
- Failing to timely pay all wages upon separation.

55. Plaintiff is informed and believes that other employees were subjected to the same unlawful practices, including:

- Being required to work off the clock;
- Being denied meal and rest breaks;
- Being underpaid or paid late; and
- Being required to perform work at multiple locations without reimbursement.

56. Defendants' violations were systemic and the result of company-wide policies, practices, and/or customs designed to reduce labor costs and maximize productivity at the expense of employees' legal rights.

FIRST CAUSE OF ACTION

NATIONAL ORIGIN DISCRIMINATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(a))

57. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

58. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c) and within the meaning of California Government Code § 12940(a),

which prohibits national origin discrimination in employment.

59. Defendants KYLIE JENNER, INC., Tri Star, and La Maison were at all material times "employers" as defined by California Government Code § 12926(d) and, as such, were barred from discriminating in employment decisions on the basis of national origin as set forth in California Government Code § 12940. Each of these Defendants, as Plaintiff's joint and/or co-employers, bears liability for the discrimination alleged herein.

60. Defendants have discriminated against Plaintiff on the basis of her national origin — Salvadoran — in violation of California Government Code § 12940(a), Article I of the California Constitution, and related statutes, by engaging in the course of conduct more fully set forth in the Factual Allegations stated above, including but not limited to assigning Plaintiff the most onerous tasks, excluding her from the housekeeping team, targeting her with hostile and demeaning treatment based on her Salvadoran origin and immigration status, and constructively terminating her employment.

61. As a result of Defendant’s discrimination against Plaintiff, Plaintiff has suffered and continues to suffer (a) substantial humiliation, serious mental anguish, and emotional and physical distress; and (b) loss of past and future earnings, and employment benefits and opportunities, all on account of which Plaintiff is entitled to compensatory damages. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

62. As more fully set forth above, the national origin discrimination was done intentionally, maliciously, wantonly, oppressively, and fraudulently with a conscious disregard for Plaintiff's rights and with the intent to vex, injure, punish, and annoy Plaintiff, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages in an amount sufficient to punish and make an example out of Defendants.

SECOND CAUSE OF ACTION

NATIONAL ORIGIN HARASSMENT

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(j))

63. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

64. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c) and within the meaning of California Government Code § 12940(j), which prohibits harassment on the basis of national origin in employment.

65. Defendants KYLIE JENNER, INC., Tri Star, and La Maison were at all material times "employers" as defined by California Government Code § 12926(d). Defendant Jenner and the individual supervisors and agents were at all relevant times supervisors and/or agents acting within the scope of their employment with one or more of the named Defendants.

66. Defendants and their agents, including Patsy and Elsi, subjected Plaintiff to severe and pervasive harassment on the basis of her national origin, including but not limited to repeated demeaning comments referencing Plaintiff's Salvadoran origin and immigration status, insinuations that coworkers of similar background had been deported, boasting about United States citizenship in a manner designed to demean Plaintiff as a work authorization permit holder, and targeting Plaintiff for mockery and belittlement based on her accent and her national background. This conduct was sufficiently severe and pervasive to alter the conditions of Plaintiff's employment and create a hostile work environment.

67. Defendants knew or should have known of the harassment and failed to take immediate and appropriate corrective action to stop the conduct and prevent its recurrence.

68. As a result of Defendants' harassment based on national origin, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages are

presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

69. As more fully set forth above, the harassment was intentional, malicious, wanton, oppressive, and fraudulent, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

THIRD CAUSE OF ACTION

RACE DISCRIMINATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(a))

70. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

71. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c) and within the meaning of California Government Code § 12940(a), which prohibits race discrimination in employment.

72. Defendants KYLIE JENNER, INC., Tri Star, and La Maison were at all material times "employers" as defined by California Government Code § 12926(d) and, as such, were barred from discriminating in employment decisions on the basis of race as set forth in California Government Code § 12940.

73. Defendants have discriminated against Plaintiff on the basis of race in violation of California Government Code § 12940(a), Article I of the California Constitution, and related statutes, by engaging in the course of conduct more fully set forth in the Factual Allegations stated above.

74. As a result of Defendant's discrimination against Plaintiff, Plaintiff has suffered and continues to suffer (a) substantial humiliation, serious mental anguish, and emotional and physical distress; and (b) loss of past and future earnings, and employment benefits and opportunities, all on account of which Plaintiff is entitled to compensatory damages. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are presently unknown to

Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

75. As more fully set forth above, the race discrimination was done intentionally, maliciously, wantonly, oppressively, and fraudulently with a conscious disregard for Plaintiff's rights and with the intent to vex, injure, punish, and annoy Plaintiff, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

FOURTH CAUSE OF ACTION

RACE HARASSMENT

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(j))

76. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

77. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c) and within the meaning of California Government Code § 12940(j), which prohibits harassment on the basis of race in employment.

78. Defendants and their agents subjected Plaintiff to severe and pervasive harassment on the basis of her race, including but not limited to repeated public humiliation, belittling comments targeting her racial identity as a Salvadoran woman, assignment of the most onerous tasks, exclusion from coworkers, and mockery directed at her before other employees. This conduct was sufficiently severe and pervasive to alter the conditions of Plaintiff's employment and create a hostile work environment.

79. Defendants knew or should have known of the harassment and failed to take immediate and appropriate corrective action.

80. As a result of Defendants' harassment based on race, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages are presently

unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

81. As more fully set forth above, the harassment was intentional, malicious, wanton, oppressive, and fraudulent, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

FIFTH CAUSE OF ACTION

RELIGION DISCRIMINATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(a))

82. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

83. Plaintiff is, and was at all times during her employment with Defendants, a practicing Catholic. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c) and within the meaning of California Government Code § 12940(a), which prohibits discrimination in employment on the basis of religion.

84. Defendants KYLIE JENNER, INC., Tri Star, and La Maison were at all material times "employers" as defined by California Government Code § 12926(d) and, as such, were barred from discriminating in employment decisions on the basis of religion as set forth in California Government Code § 12940.

85. Defendants and their agents, including Elsi and Patsy, engaged in discriminatory conduct toward Plaintiff based on her Catholic religion, including but not limited to making derogatory statements such as "Catholics are horrible people" in Plaintiff's presence and in the presence of coworkers. Defendants discriminated against Plaintiff on the basis of religion by subjecting her to disparate and hostile treatment, failing to investigate or remedy the discriminatory conduct of its managing agents, and constructively terminating Plaintiff's employment, as more fully set forth in the Factual Allegations above.

86. As a result of Defendants' discrimination on the basis of religion, Plaintiff has

suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment opportunities. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

87. As more fully set forth above, the religious discrimination was done intentionally, maliciously, wantonly, oppressively, and fraudulently with a conscious disregard for Plaintiff's rights, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

SIXTH CAUSE OF ACTION

RELIGION HARASSMENT

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(j))

88. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

89. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c) and within the meaning of California Government Code § 12940(j), which prohibits harassment on the basis of religion in employment.

90. Defendants and their agents subjected Plaintiff to harassment on the basis of her Catholic faith, including repeated derogatory comments such as "Catholics are horrible people," made by Defendants' supervisors and managing agents in Plaintiff's presence. This conduct was sufficiently severe and/or pervasive to alter the conditions of Plaintiff's employment and create a hostile work environment based on religion.

91. Defendants knew or should have known of the religious harassment and failed to take immediate and appropriate corrective action to stop the conduct and prevent its recurrence.

92. As a result of Defendants' harassment on the basis of religion, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical

distress, and loss of past and future earnings and employment opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

93. As more fully set forth above, the harassment was intentional, malicious, wanton, oppressive, and fraudulent, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

SEVENTH CAUSE OF ACTION

DISABILITY DISCRIMINATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(a))

94. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

95. Plaintiff was at all times hereto an "employee" as defined by California Government Code § 12926(c). As a result of the hostile working conditions to which Defendants subjected Plaintiff, Plaintiff developed and suffered from anxiety, severe work-related stress, and post-traumatic stress disorder — each of which constitutes a mental and/or physical disability within the meaning of California Government Code § 12926(m).

96. Defendants KYLIE JENNER, INC., Tri Star, and La Maison were at all material times "employers" as defined by California Government Code § 12926(d) and, as such, were barred from discriminating in employment decisions on the basis of disability as set forth in California Government Code § 12940(a).

97. Defendants were aware of Plaintiff's disability and her need for medical leave. Notwithstanding this knowledge, Defendants continued to subject Plaintiff to hostile, abusive, and adverse working conditions. Defendants discriminated against Plaintiff on the basis of her disability by, among other things, failing to provide reasonable accommodation for her medical condition, continuing to impose excessive workloads and hostile conditions after learning of her

disability, failing to engage in any interactive process, and constructively terminating Plaintiff's employment rather than taking steps to accommodate her known disability.

98. As a result of Defendants' disability discrimination, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment opportunities. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

99. As more fully set forth above, the disability discrimination was done intentionally, maliciously, wantonly, oppressively, and fraudulently with a conscious disregard for Plaintiff's rights, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

EIGHTH CAUSE OF ACTION

DISABILITY HARASSMENT

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(j))

100. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

101. Plaintiff was at all times hereto an "employee" within the meaning of California Government Code § 12940(j), which prohibits harassment on the basis of disability. Plaintiff's anxiety, severe stress-related disorder, and post-traumatic stress disorder constituted disabilities within the meaning of Government Code § 12926(m).

102. Defendants and their agents continued to subject Plaintiff to harassing and hostile conduct after becoming aware of her disability, including imposing excessive workloads, directing verbal abuse at her, and engaging in retaliatory conduct that exacerbated her medical condition and interfered with her ability to seek treatment and recovery. This conduct was sufficiently severe and/or pervasive to alter the conditions of Plaintiff's employment and create a hostile work

environment based on her disability.

103. Defendants knew or should have known of the disability harassment and failed to take immediate and appropriate corrective action.

104. As a result of Defendants' harassment based on disability, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

105. As more fully set forth above, the harassment was intentional, malicious, wanton, oppressive, and fraudulent, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

NINTH CAUSE OF ACTION

FAILURE TO PROVIDE REASONABLE ACCOMMODATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(m))

106. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

107. Plaintiff was an "employee" within the meaning of Government Code § 12940(m), and suffered from known disabilities including anxiety, a severe stress-related disorder, and post-traumatic stress disorder. Defendants KYLIE JENNER, INC., Tri Star, and La Maison were "employers" within the meaning of Government Code § 12940(m) and were each obligated to provide reasonable accommodation for Plaintiff's known disability absent undue hardship.

108. Defendants failed to provide Plaintiff with any reasonable accommodation for her disability, including but not limited to a modified work schedule, a reduced workload, adequate protected medical leave, or any other accommodation that would have allowed Plaintiff to perform her job duties without exacerbating her medical conditions. Instead, Defendants continued to

impose excessive and unreasonable demands on Plaintiff despite knowing of her disability and medical condition.

109. As a result of Defendants' failure to provide reasonable accommodation, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment opportunities. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

110. Plaintiff is also entitled to reasonable attorneys' fees and costs pursuant to applicable provisions of the California Fair Employment and Housing Act.

TENTH CAUSE OF ACTION

FAILURE TO ENGAGE IN THE INTERACTIVE PROCESS

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(n))

111. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

112. California Government Code § 12940(n) requires an employer to engage in a timely, good-faith interactive process with an employee with a known disability to determine effective reasonable accommodations.

113. Plaintiff's disability was known to Defendants. Defendants failed to initiate or participate in any good-faith interactive process with Plaintiff to identify and implement effective reasonable accommodations for her known disability. Defendants took no steps to communicate with Plaintiff about her medical condition or her need for accommodation, and instead continued to impose hostile and harmful working conditions that exacerbated Plaintiff's disability and ultimately forced her to resign.

114. As a result of Defendants' failure to engage in the interactive process, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and

physical distress, and loss of past and future earnings and employment opportunities. The exact amount and nature of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

115. Plaintiff is also entitled to reasonable attorneys' fees and costs pursuant to applicable provisions of the California Fair Employment and Housing Act.

ELEVENTH CAUSE OF ACTION

RETALIATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(h))

116. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

117. In violation of California Government Code § 12940(h), Defendants retaliated against Plaintiff for engaging in protected activity, including reporting and complaining to supervisors Laura and Itzel about discrimination, harassment, and hostile working conditions based on her national origin, race, religion, and disability. Following her protected complaints, Defendants escalated the hostile treatment directed at Plaintiff, increased her workload, reduced her scheduled hours, issued pretextual disciplinary warnings, withheld wages, and constructively terminated her employment.

118. As a direct and proximate result of Defendants' retaliatory actions against Plaintiff, Plaintiff suffered and continues to suffer substantial (a) humiliation, serious mental anguish, and emotional and physical distress; and (b) loss of past and future wages, and employment benefits and opportunities, on account of which Plaintiff is entitled to compensatory damages, the exact amount and nature of which exceeds the jurisdictional limits of this court but is presently unknown to Plaintiff, who will either seek leave to amend this complaint upon ascertaining such information, or will prove the same at the time of trial.

119. As more fully set forth above, Defendants' retaliatory actions were willful, wanton,

malicious, and oppressive and committed with the intent to cause the injuries sustained by Plaintiff, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages in an amount sufficient to punish and make an example of Defendants.

TWELFTH CAUSE OF ACTION

FAILURE TO PREVENT DISCRIMINATION, HARASSMENT, AND RETALIATION AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Gov. Code § 12940(k))

120. Plaintiff alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

121. Defendants KYLIE JENNER, INC., Tri Star, and La Maison each failed to take all reasonable steps to prevent, correct, and remedy the discrimination, harassment, and retaliation suffered by Plaintiff, in violation of California Government Code § 12940(k), by engaging in the course of conduct set forth in the Factual Allegations and all paragraphs stated above. Defendants failed to implement and enforce effective anti-discrimination and anti-harassment policies, failed to investigate Plaintiff's complaints, and failed to take any meaningful corrective or preventative action against those managers, supervisors, and employees who discriminated against, harassed, and retaliated against Plaintiff.

122. Defendants failed to take any meaningful preventative and corrective action against those managers, supervisors, and employees who were harassing and discriminating against Plaintiff or enabling others to engage in such conduct. If Defendants maintained a written policy addressing discrimination, harassment, and retaliation, that policy was not enforced and was consistently disregarded.

123. As a result of Defendants' failure to prevent the unlawful discrimination, harassment, and retaliation, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment benefits and opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are

presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

124. As more fully set forth above, Defendants' failure to prevent the unlawful conduct was intentional, malicious, wanton, oppressive, and fraudulent, with conscious disregard for Plaintiff's rights, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

THIRTEENTH CAUSE OF ACTION

WHISTLEBLOWER RETALIATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Labor Code § 1102.5)

125. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

126. California Labor Code § 1102.5 prohibits an employer from retaliating against an employee for disclosing information to a person with authority over the employee, or to another employee who has the authority to investigate, discover, or correct the violation or noncompliance, where the employee has reasonable cause to believe that the information discloses a violation of a state or federal statute or a local, state, or federal rule or regulation.

127. Throughout her employment, Plaintiff complained to supervisors Laura and Itzel about violations of California wage and hour laws, including but not limited to: the failure to pay all wages earned; the failure to provide legally required meal and rest periods; the failure to provide accurate itemized wage statements; the failure to reimburse her for work-related expenses; and the failure to pay her for all hours worked. Plaintiff reasonably believed these practices violated California law, including the California Labor Code and applicable Wage Orders.

128. Following Plaintiff's complaints about these unlawful practices, Defendants retaliated against Plaintiff by, among other things, escalating the hostile treatment directed at her, reducing her scheduled hours, issuing pretextual disciplinary warnings, withholding wages, and constructively discharging her from employment.

129. As a direct and proximate result of Defendants' retaliatory actions in violation of Labor Code § 1102.5, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future wages and employment opportunities. Plaintiff is entitled to all remedies available under Labor Code § 1102.5, including reinstatement, back pay, reimbursement of lost wages and benefits, and other damages according to proof.

130. As more fully set forth above, Defendants' retaliatory conduct was willful, wanton, malicious, and oppressive, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

FOURTEENTH CAUSE OF ACTION

CONSTRUCTIVE WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

131. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

132. Defendants violated the Fair Employment and Housing Act (FEHA), California Government Code § 12940 et seq., the California Labor Code, and other applicable statutes, by creating and permitting a hostile work environment and engaging in unlawful discrimination, harassment, and retaliation against Plaintiff based on her race, national origin, religion, and disability, and by failing to pay wages and provide legally required workplace protections.

133. The working conditions imposed by Defendants were so intolerable, hostile, and unlawful that a reasonable person in Plaintiff's position would have felt compelled to resign. Plaintiff's resignation on August 4, 2025 constitutes a constructive termination of her employment in violation of the fundamental public policies expressed in the California Fair Employment and Housing Act, the California Labor Code, and related statutes.

134. The aforementioned acts of Defendants constitute constructive wrongful termination in violation of public policy.

135. As a result of Defendants' wrongful conduct, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment benefits and opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages exceed the jurisdictional limits of this court, but are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

136. As more fully set forth above, the acts of Defendants were intentional, malicious, wanton, oppressive, and fraudulent, with conscious disregard for Plaintiff's rights, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

FIFTEENTH CAUSE OF ACTION

FAILURE TO PAY MINIMUM AND STRAIGHT-TIME WAGES

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

137. Plaintiff alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

138. In violation of applicable Wage Order, California Labor Code §§ 204, 1194, and 1197, and related statutes, Defendants failed to pay Plaintiff all minimum and straight-time wages earned during her employment, including all hours worked. Defendants failed to compensate Plaintiff for all compensable time, including time spent working off the clock and time spent performing duties outside her assigned role without additional compensation.

139. As a result, Plaintiff is entitled to back wages, prejudgment interest, reasonable attorneys' fees and costs, and civil penalties pursuant to California Labor Code §§ 204, 1194, 1194.2, 1197, and related statutes. The exact amounts of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

140. As a further direct and proximate result of Defendant's conduct, Plaintiff has had to retain attorneys to prosecute her claim for wages under the Labor Code, and she is entitled to

recover her attorneys' fees and costs under Labor Code § 218.5.

SIXTEENTH CAUSE OF ACTION

FAILURE TO PAY OVERTIME COMPENSATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

141. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

142. California Labor Code § 510 requires an employer to pay an employee at a rate of no less than one and one-half times the regular rate of pay for time worked above eight hours in one day, and for the first eight hours on the seventh consecutive day worked, even if the employee works less than forty hours in a work week.

143. California Labor Code § 510 further requires an employer to pay an employee at a rate of no less than twice the regular rate of pay for time worked above twelve hours in one day, and for time over eight hours on the seventh consecutive day worked.

144. Defendants failed to pay Plaintiff overtime wages to which she was entitled under California Labor Code § 510, including but not limited to overtime compensation due for shifts exceeding eight and twelve hours per day, including the twelve-plus-hour event shift described in the Factual Allegations above.

145. As a result, Defendants have violated California Labor Code §§ 510, 204, and 1194, and related statutes. Plaintiff is entitled to back wages for unpaid overtime, prejudgment interest, reasonable attorneys' fees and costs, and civil penalties. The exact amount and nature of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

SEVENTEENTH CAUSE OF ACTION

FAILURE TO PROVIDE MEAL PERIODS

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

146. Plaintiff re-alleges and incorporates herein by this reference each and every

allegation set forth in all previous paragraphs of the Complaint.

147. California Labor Code § 512 and the applicable Wage Order require employers to provide employees with an uninterrupted thirty-minute meal period for shifts exceeding five hours, and a second uninterrupted thirty-minute meal period for shifts exceeding ten hours. Where a compliant meal period is not provided, the employer must pay the employee one additional hour of pay at the regular rate of compensation for each workday on which the meal period was not provided.

148. Defendants failed to provide Plaintiff with lawful meal periods on multiple occasions throughout her employment. In particular, Plaintiff was regularly required to work shifts of over five and ten hours without being provided the legally required meal breaks, including but not limited to the twelve-plus-hour event shift described above, and on numerous other workdays.

149. As a result, Plaintiff is entitled to premium pay and all other available statutory remedies pursuant to California Labor Code § 226.7 and the applicable Wage Order. The exact amounts of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

EIGHTEENTH CAUSE OF ACTION

FAILURE TO PROVIDE REST PERIODS

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

150. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

151. California Labor Code § 226.7 and the applicable Wage Order require employers to authorize and permit employees to take a paid ten-minute rest period for every four hours worked, or major fraction thereof. Where a rest period is not provided, the employer must pay the employee one additional hour of pay at the regular rate for each workday on which the rest period was not provided.

152. Defendants failed to authorize and permit Plaintiff to take legally compliant rest periods on multiple occasions throughout her employment, including during the twelve-plus-hour

event shift and on other workdays described in the Factual Allegations above. On some occasions, Plaintiff was actively prevented from taking authorized rest periods even when she attempted to do so.

153. As a result, Plaintiff is entitled to premium pay and all other available statutory remedies pursuant to California Labor Code § 226.7 and the applicable Wage Order. The exact amounts of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

NINETEENTH CAUSE OF ACTION

FAILURE TO PROVIDE ACCURATE ITEMIZED WAGE STATEMENTS

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Lab. Code § 226)

154. Plaintiff alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

155. During Plaintiff's employment with Defendants intentionally and knowingly failed to provide Plaintiff with timely and accurate wage and hour statements showing gross wages earned, total hours worked, all deductions made, net wages earned, and all applicable hourly rates in effect during each pay period and the corresponding number of hours worked at each hourly rate, as required by California Labor Code § 226.

156. Defendants systematically failed to provide such wage statements with accurate information and engaged in a policy of under-reporting and failing to pay for all hours actually worked in violation of California Labor Code § 226 and related statutes.

157. As a result of Defendant's violation of California Labor Code § 226, Plaintiff has suffered injuries and damages, including but not limited to: being denied overtime wages to which she was entitled; being denied meal and rest period premium pay; being denied wages due; and being deprived of the documentation necessary to accurately track wages owed.

158. As a result of Defendant's intentional failure to provide Plaintiff with accurate and itemized wage statements, Plaintiff is entitled to all available statutory penalties, costs, and

attorneys' fees pursuant to California Labor Code § 226(e) and all other available remedies.

TWENTIETH CAUSE OF ACTION

WAITING TIME PENALTIES

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Lab. Code § 203)

159. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

160. During the course of her employment, Defendants failed to pay all accrued wages and other compensation due to Plaintiff at the time of her separation from employment. Defendants' failure to timely pay all wages due upon Plaintiff's separation was willful within the meaning of California Labor Code § 203.

161. As a result, Plaintiff is entitled to waiting time penalties, back wages, prejudgment interest, reasonable attorneys' fees and costs, and civil penalties pursuant to California Labor Code §§ 203, 1194, 1197, and related statutes. The exact amounts of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

TWENTY-FIRST CAUSE OF ACTION

FAILURE TO PROVIDE PAID SICK LEAVE

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Labor Code §§ 233–234, 246)

162. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

163. California Labor Code §§ 233, 234, and 246 require employers to provide eligible employees with paid sick leave and prohibit employers from retaliating or taking adverse action against employees who use or attempt to use accrued sick leave.

164. During her employment with Defendants, Plaintiff accrued and was entitled to use

paid sick leave. Defendants failed to allow Plaintiff to use all of her accrued paid sick leave and/or retaliated against Plaintiff for using or attempting to use her accrued paid sick leave, in violation of California Labor Code §§ 233, 234, and 246.

165. As a result of Defendants' violations, Plaintiff has suffered damages including but not limited to loss of accrued sick leave benefits, statutory civil penalties, and other remedies available under California law. The exact amounts of such damages are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

TWENTY-SECOND CAUSE OF ACTION

FAILURE TO REIMBURSE BUSINESS EXPENSES

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Labor Code § 2802)

166. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

167. California Labor Code § 2802 requires employers to indemnify employees for all necessary expenditures or losses incurred by the employee in direct consequence of the discharge of their duties or their obedience to the directions of the employer.

168. During her employment, Plaintiff was directed by Defendants to travel to and perform work at locations other than her primary work site, including Defendant Jenner's boyfriend's residence on multiple occasions. Plaintiff incurred necessary expenses, including mileage and transportation costs, in performing these work-related duties at the direction of Defendants. Defendants failed to reimburse Plaintiff for these necessary business expenses.

169. As a result of Defendants' failure to reimburse Plaintiff's necessary business expenses in violation of California Labor Code § 2802, Plaintiff has suffered damages in an amount to be proven at trial, together with interest and attorneys' fees as permitted by law.

TWENTY-THIRD CAUSE OF ACTION

UNFAIR COMPETITION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

(Bus. & Prof. Code § 17200)

170. Plaintiff alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

171. California Business and Professions Code § 17200 provides that unfair competition includes any unlawful, unfair, or fraudulent business act or practice.

172. Wage and hour laws express fundamental public policies of the State of California. Providing employees with wages for all hours worked, meal and rest periods, paid sick leave, reimbursement of necessary business expenses, and accurate itemized records are fundamental public policies of this State. Labor Code § 90.5(a) articulates the public policy of this State to vigorously enforce minimum labor standards, to ensure that employees are not required or permitted to work under substandard and unlawful conditions, and to protect employers who comply with the law from those who gain a competitive advantage by failing to comply with minimum labor standards.

173. Through the conduct alleged herein, Defendants have acted contrary to these public policies, have violated specific provisions of the California Labor Code and the California Fair Employment and Housing Act, and have engaged in unlawful and unfair business practices in violation of California Business and Professions Code § 17200, et seq., depriving Plaintiff of rights, benefits, and privileges guaranteed to all employees in California.

174. During the course of Plaintiff's employment, Defendants engaged in multiple violations of the California Labor Code by failing to pay all wages due, failing to provide meal and rest periods, failing to reimburse business expenses, failing to provide paid sick leave, and failing to provide accurate and itemized wage statements.

175. Defendants' conduct, as alleged herein, constitutes unfair competition in violation of Business and Professions Code § 17200, et seq. Such acts constitute an unfair business practice

and unfair competition, thus violating California Business and Professions Code § 17200 et seq. As a result, Defendants obtained valuable property, money, and services from Plaintiff, including earned wages for all hours worked, and deprived her of valuable rights and benefits guaranteed by law, all to the detriment of Plaintiff and to the benefit of Defendants, allowing Defendants to unfairly compete against employers who comply with the law.

176. As a result of the foregoing conduct, Plaintiff is entitled to recover restitution in the form of payment of unlawfully withheld wages and other benefits. Plaintiff is also entitled to recover reasonable attorneys' fees pursuant to Code of Civil Procedure § 1021.5 and the substantial benefit doctrine.

TWENTY-FOURTH CAUSE OF ACTION

WRONGFUL TERMINATION

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

177. Plaintiff re-alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint as if fully set forth herein.

178. Defendants violated the Fair Employment and Housing Act (FEHA), California Government Code § 12940 et seq., the California Labor Code, and other applicable statutes, by discriminating against and retaliating against Plaintiff on the basis of her race, national origin, religion, and disability, and for engaging in protected activity, and by constructively terminating her employment.

179. The constructive termination of Plaintiff's employment was without real, substantial, or compelling reason and constitutes wrongful termination in violation of public policy as expressed in the California Fair Employment and Housing Act, the California Labor Code, and the California Constitution.

180. As a result of Defendants' wrongful conduct, Plaintiff has suffered and continues to suffer substantial humiliation, serious mental anguish, emotional and physical distress, and loss of past and future earnings and employment benefits and opportunities, for which she is entitled to compensatory damages. The exact amount and nature of such damages exceed the jurisdictional

limits of this court, but are presently unknown to Plaintiff, who will either seek leave to amend this Complaint upon ascertaining such information or will prove the same at the time of trial.

181. As more fully set forth above, the acts of Defendants were intentional, malicious, wanton, oppressive, and fraudulent, with conscious disregard for Plaintiff's rights, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

TWENTY-FIFTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

182. Plaintiff alleges and incorporates herein by this reference each and every allegation set forth in all previous paragraphs of the Complaint.

183. Defendants engaged in race, national origin, religion, and disability discrimination, harassment, and retaliation against Plaintiff, and aided and abetted each other in engaging in this illegal conduct, thereby subjecting Plaintiff to intentional infliction of emotional distress in violation of California Government Code § 12940 and applicable common law.

184. Defendants failed to take immediate and appropriate remedial action in response to Plaintiff's complaints of discrimination and harassment. Instead, Defendants ignored Plaintiff's complaints and allowed Plaintiff to be subjected to escalating retaliatory and abusive conduct.

185. The acts of Defendants as described herein were extreme and outrageous and constituted an abuse of Defendants' authority and positions. Such conduct was intended to cause severe emotional distress, or was done with conscious disregard for the probability of causing such distress. Such conduct exceeded the inherent risks of employment and was not the sort of conduct normally expected to occur in the workplace. Defendants abused their positions of authority toward Plaintiff and engaged in conduct designed to humiliate her and convey the message that she was powerless to defend her rights.

186. As a proximate result of the aforementioned acts, Plaintiff has suffered embarrassment, anxiety, humiliation, serious mental anguish, emotional and physical distress, and

PTSD symptoms. Plaintiff will continue to suffer damages in a sum that exceeds the jurisdictional limits of this court, but is yet to be ascertained. Plaintiff will either seek leave to amend this Complaint upon ascertaining such information, or will prove the same at the time of trial.

187. As more fully set forth above, the acts of Defendants were intentional, malicious, wanton, oppressive, and fraudulent, with conscious disregard for Plaintiff's rights, within the meaning of California Civil Code § 3294. Plaintiff is therefore entitled to punitive or exemplary damages.

TWENTY-SIXTH CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

AGAINST DEFENDANTS KYLIE JENNER, INC., TRI STAR SERVICES LLC, LA MAISON FAMILY SERVICES LLC, AND DOES 1–25

188. Each of the above paragraphs contained in this Complaint is hereby incorporated by reference at this point as if set forth herein in full.

189. In carrying out the above conduct, Defendants, and their employees and agents, breached the duty owed to Plaintiff to provide a workplace free from discrimination, harassment, and retaliation, and abused their positions of authority toward Plaintiff. Said conduct exceeded the inherent risks of employment and was not the sort of conduct normally expected to occur in the workplace.

190. Defendants, and their employees and agents, knew, or should have known, that the above conduct would cause Plaintiff serious emotional distress. As a proximate result of Defendants' negligent conduct, Plaintiff suffered and will continue to suffer extreme humiliation, embarrassment, anxiety, mental anguish, and emotional distress in an amount according to proof.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

1. For such general, special, and compensatory, actual and liquidated damages in amounts to be proven at the time of trial;

2. For restitution damages in the form of unpaid wages, meal and rest period premium pay, unreimbursed business expenses, unpaid sick leave, and all other compensation unlawfully withheld;

3. For punitive and exemplary damages in amounts to be proven at the time of trial;

4. For penalties pursuant to the California Labor Code;

5. For waiting time penalties under Labor Code § 203;

6. For the amounts provided for in applicable Wage Orders and the California Labor Code;

7. For reasonable attorneys' fees under the California Fair Employment and Housing Act, the California Labor Code, and all related statutes, including California Code of Civil Procedure § 1021.5;

8. A declaratory judgment that the practices complained of in this Complaint are unlawful under California law;

9. An injunction against Defendants, their officers, agents, successors, employees, representatives, and any and all persons acting in concert with them, from engaging in each of the practices complained of in this Complaint;

10. For costs of the suit incurred herein;

11. For pre- and post-judgment interest at the prevailing statutory rates; and

12. For such other and further relief as the Court may deem proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial for the causes of action set forth herein.

Dated: April 17, 2026

SHAKER LAW GROUP
A PROFESSIONAL CORPORATION

By: _____

DELLA SHAKER, ESQ.,
Attorney for Plaintiff Angelica Hernandez Vasquez