

**13 CIV 4942**  
**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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**RON CHALHON,**

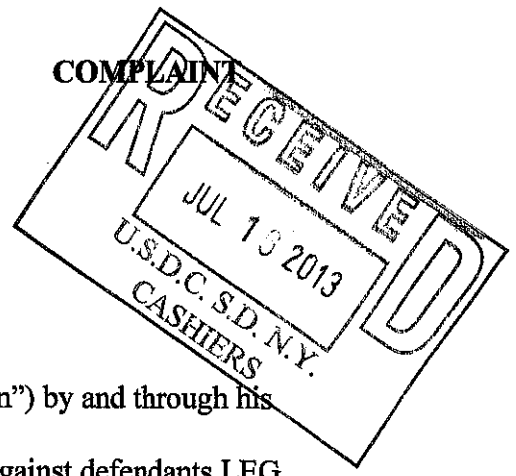
**No.:**

**Plaintiff,**

**-against-**

**LEG AVENUE, INC., AMY TSAI, Individually, and**  
**MELODY TSAI, Individually,**

**Defendants.**  
-----X



Plaintiff, RON CHALHON (“Plaintiff” or “Mr. Chalhon”) by and through his attorneys, LEVINE & BLIT, PLLC, as and for his Complaint against defendants LEG AVENUE, INC. (“Leg Avenue”), AMY TSAI, Individually (“Amy Tsai”), and MELODY TSAI, Individually (“Melody Tsai”) (hereinafter defendants shall be collectively referred to as “Defendant”) alleges upon information and belief:

**NATURE OF THE ACTION**

1. Mr. Chalhon brings this action to remedy discriminatory termination based on religion and hostile work environment harassment based on his religious beliefs and ethnicity under Title VII of the Civil Rights Act of 1964, as amended, the New York State Human Rights Law (“NYSHRL”), the New York City Human Rights Law (“NYCHRL”).
2. Defendant's actions were unlawful and in violation of Mr. Chalhon’s statutorily protected civil rights. As such, Mr. Chalhon brings this action for injunctive and declaratory relief; lost past and future wages; compensatory damages, including, but

not limited to, damages for emotional distress, mental anguish, and humiliation; costs and attorneys' fees; punitive damages; and all other appropriate equitable and legal relief.

### **JURISDICTION and VENUE**

3. Jurisdiction of this Court is proper under 28 U.S.C. §§ 1331 and 1367.
4. Venue for this action in the Southern District of New York is appropriate pursuant to 28 U.S.C. § 1391, as a substantial part of the events giving rise to these claims occurred in the Southern District of New York.
5. The EEOC has issued a notice of right to sue to Mr. Chalhon on June 25, 2013. Attached hereto as "Exhibit A" is a copy of the EEOC notice of right to sue.

### **PARTIES**

6. Mr. Chalhon is a fifty-three (53) year-old Jewish male who is a resident of the State of New York, County of Kings.
7. Leg Avenue is a foreign corporation duly organized and existing under the laws of the State of California, which maintains an executive headquarters located at 18240 Sentreno Street, Rowland Heights, California 91748. Leg Avenue is licensed to do business in the State of New York and at all times relevant to this Complaint did conduct business in the State of New York in the Southern District of New York.
8. Melody Tsai, a Taiwanese female, served as Creative Director of Leg Avenue and held a position of authority over Mr. Chalhon to control and direct the terms and

conditions of his employment. Upon information and belief, Melody Tsai is not of the Jewish faith.

9. Amy Tsai, a Taiwanese female, served as Chief Marketing Officer at Leg Avenue and held a position of authority over Mr. Chalhon to control and direct the terms and conditions of his employment. Upon information and belief, Amy Tsai is not of the Jewish faith.
10. Mr. Chalhon was an “employee” of Defendant within the meaning of the applicable federal and local statutes.
11. Mr. Chalhon maintained the requisite experience, skills, and/or qualifications for his position at Leg Avenue to be considered qualified for his position of employment and satisfactorily performed his duties of employment.
12. Upon information and belief, Leg Avenue is owned and operated by the Tsai family.
13. Defendant maintained an employment relationship with fifteen (15) or more individuals, and are “employers” within the meaning of the applicable federal and local statutes.

### **FACTUAL ALLEGATIONS**

14. On or about March 8, 2008, Mr. Chalhon was hired by Leg Avenue to serve as Territory Manager for the State of New York. His duties included servicing existing customer accounts, opening new customer accounts, and attending trade shows throughout the State of New York, including, but not limited to, the Southern District of New York, and the surrounding areas.

15. On October 10, 2012, Mr. Chalhon was unlawfully and discriminatorily terminated from his position as Territory Manager due to Defendant's discriminatory beliefs and practices against Jewish persons, which are addressed below.
16. For at least a year before his unlawful termination, Mr. Chalhon was subjected to Defendant's discriminatory practices against him as a Jewish person.
17. Mr. Chalhon was not allowed to join Leg Avenue's medical insurance plan offered to all qualifying employees because of its discriminatory beliefs and practices against Jewish persons. Leg Avenue claimed that he had missed the time for enrollment; however, Mr. Chalhon was never given notice regarding the time for enrollment demonstrating Defendant's discriminatory intent against him as a Jewish person.
18. During this time, Melody Tsai and Amy Tsai made their disdain for Jewish persons known to Mr. Chalhon. Melody Tsai and/or Amy Tsai stated directly to Mr. Chalhon or in his presence "Fucking Jews are always looking for money.", "Who is that little Jewish man to sue us?" (in reference to a former employee of Leg Avenue who brought a legal action against it), "Why doesn't that Jew ever reach into his pocket?", and "It's a bad time to be Jewish!" (stated directly to Mr. Chalhon before Yom Kippur). Additionally, when speaking in their native language they would use the word "khan", which translates into "Jew".
19. As a result of their discriminatory beliefs about Jewish persons, Amy Tsai and Melody Tsai would consistently berate Mr. Chalhon by calling him names, such as

idiot, moron, and asshole; insult him because of his hair loss; threaten to take away accounts from him; and force him to do heavy lifting at trade shows.

20. At an employee dinner, Amy Tsai, motivated primarily by her discriminatory beliefs against Mr. Chalhon, further humiliated, harassed, and intentionally caused physical harm to Mr. Chalhon by purposefully pulling a chair out from under him as he went to sit down.
21. Pursuant to Defendant's conduct alleged above, Mr. Chalhon was subjected to a hostile and abusive working environment, from both a subjective and objective perspective, which altered the conditions of his employment.
22. On October 10, 2012, Mr. Chalhon was wrongfully terminated due to Defendant's discriminatory beliefs. Mr. Chalhon had never received any write-ups or warnings, and had received positive reviews.
23. As a result of Defendant's conduct alleged above, including its discriminatory termination, Mr. Chalhon has suffered lost wages, lost commissions, and lost employment benefits; severe emotional distress, mental anguish, embarrassment and humiliation; and physical pain and suffering as a direct result of Defendant's conduct.
24. Because of his religion and ethnicity, Mr. Chalhon was intentionally discriminated against and subjected to hostile work environment harassment by Defendant in violation of Title VII of the Civil Rights Act of 1964, as amended, and other applicable state and local laws.

**FIRST CAUSE OF ACTION AGAINST LEG AVENUE  
(Discriminatory Termination Based Upon Religion in Violation of Title VII)**

25. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 24 above with the same force and effect as if fully set forth herein.
26. Plaintiff, due to his observance of Judaism, is a member of the protected class pursuant to Title VII.
27. At all times relevant to the instant action, Mr. Chalhon was qualified, by his experience, knowledge, and/or training, to hold his position of employment with Leg Avenue.
28. Mr. Calhon suffered a materially adverse employment action, as his position of employment with Leg Avenue was terminated.
29. The materially adverse employment action taken against Mr. Chalhon came under circumstances giving rise to an inference of discrimination based upon his religious faith, as alleged above, in that, his employment was discriminately terminated as a result of his religious beliefs and the disparaging comments made by Melody Tsai and/or Amy Tsai about his religious beliefs.
30. As a result of Leg Avenue's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering as a direct result of Leg Avenue's conduct.

31. Leg Avenue acted intentionally with malice and reckless indifference to Plaintiff's rights under Title VII and is thereby liable to Plaintiff for punitive damages under Title VII.

**SECOND CAUSE OF ACTION AGAINST LEG AVENUE  
(Discriminatory Termination Based Upon Ethnicity in Violation of Title VII)**

32. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 31 above with the same force and effect as if fully set forth herein.

33. Plaintiff, due to his ethnicity, is a member of the protected class pursuant to Title VII.

34. At all times relevant to the instant action, Mr. Chalhon was qualified, by his experience, knowledge, and/or training, to hold his position of employment with Leg Avenue.

35. Mr. Calhon suffered a materially adverse employment action, as his position of employment with Leg Avenue was terminated.

36. The materially adverse employment action taken against Mr. Chalhon by Leg Avenue came under circumstances giving rise to an inference of discrimination based upon his ethnicity, in that, his employment was discriminately terminated as a direct result of his ethnicity and subsequent to disparaging comments made by Melody Tsai and/or Amy Tsai about his ethnicity.

37. As a result of Leg Avenue's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress

and mental anguish; and physical pain and suffering as a direct result of Leg Avenue's conduct.

38. Leg Avenue acted intentionally with malice and reckless indifference to Plaintiff's rights under Title VII and is thereby liable to Plaintiff for punitive damages under Title VII.

**THIRD CAUSE OF ACTION AGAINST DEFENDANT  
(Discriminatory Termination Based upon Religion in Violation of the NYSHRL)**

39. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 38 above with the same force and effect as if fully set forth herein.
40. Plaintiff, due to his observance of Judaism, is a member of the protected class pursuant to the NYSHRL.
41. At all times relevant to the instant action, Mr. Chalhoun was qualified, by his experience, knowledge, and/or training, to hold his position of employment with Leg Avenue.
42. Mr. Chalhoun suffered a materially adverse employment action, as his position of employment with Leg Avenue was terminated.
43. The materially adverse employment action taken against Mr. Chalhoun came under circumstances giving rise to an inference of discrimination based upon his religious faith, as alleged above, in that, his employment was discriminately terminated as a result of his religious beliefs and the disparaging comments made by Melody Tsai and/or Amy Tsai about his religious beliefs.



44. As a result of their position of authority over Mr. Chalhon and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYSHRL, which makes it an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden” by the NYSHRL, or attempt to do so.
45. As a result of Defendant’s discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering as a direct result of Leg Avenue’s conduct.

**FOURTH CAUSE OF ACTION AGAINST DEFENDANT  
(Discriminatory Termination Based upon Religion in Violation of the NYCHRL)**

46. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 45 above with the same force and effect as if fully set forth herein.
47. Plaintiff, due to his observance of Judaism, is a member of the protected class pursuant to the NYCHRL.
48. At all times relevant to the instant action, Mr. Chalhon was qualified, by his experience, knowledge, and/or training, to hold his position of employment with Leg Avenue.
49. Mr. Calhon suffered a materially adverse employment action, as his position of employment with Leg Avenue was terminated.

50. The materially adverse employment action taken against Mr. Chalhoun came under circumstances giving rise to an inference of discrimination based upon his religious faith, as alleged above, in that, his employment was discriminately terminated as a result of his religious beliefs and the disparaging comments made by Melody Tsai and/or Amy Tsai about his religious beliefs.
51. As a result of their position of authority over Mr. Chalhoun and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYCHRL, which makes it an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden” by the NYCHRL, or attempt to do so.
52. As a result of Defendant’s discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering as a direct result of Leg Avenue’s conduct.
53. Defendant acted intentionally with malice and reckless indifference to Plaintiff’s rights under the NYCHRL and is thereby liable to Plaintiff for punitive damages.

**FIFTH CAUSE OF ACTION AGAINST DEFENDANT  
(Discriminatory Termination Based upon Ethnicity in Violation of the NYSHRL)**

54. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 53 above with the same force and effect as if fully set forth herein.

55. Plaintiff, due to his ethnicity, is a member of the protected class pursuant to the NYSHRL.
56. At all times relevant to the instant action, Mr. Chalhon was qualified, by his experience, knowledge, and/or training, to hold his position of employment with Leg Avenue.
57. Mr. Chalhon suffered a materially adverse employment action, as his position of employment with Leg Avenue was terminated.
58. The materially adverse employment action taken against Mr. Chalhon by Defendant came under circumstances giving rise to an inference of discrimination based upon his ethnicity, in that, his employment was discriminately terminated as a direct result of his ethnicity and subsequent to disparaging comments made by Melody Tsai and/or Amy Tsai about his ethnicity.
59. As a result of their position of authority over Mr. Chalhon and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYSHRL, which makes it an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden” by the NYSHRL, or attempt to do so.
60. As a result of Defendant’s discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering as a direct result of Leg Avenue’s conduct.

**SIXTH CAUSE OF ACTION AGAINST DEFENDANT  
(Discriminatory Termination Based upon Ethnicity in Violation of the NYCHRL)**

61. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 60 above with the same force and effect as if fully set forth herein.
62. Plaintiff, due to his ethnicity, is a member of the protected class pursuant to the NYCHRL.
63. At all times relevant to the instant action, Mr. Chalhon was qualified, by his experience, knowledge, and/or training, to hold his position of employment with Leg Avenue.
64. Mr. Chalhon suffered a materially adverse employment action, as his position of employment with Leg Avenue was terminated.
65. The materially adverse employment action taken against Mr. Chalhon by Leg Avenue came under circumstances giving rise to an inference of discrimination based upon his ethnicity, in that, his employment was discriminately terminated as a direct result of his ethnicity and subsequent to disparaging comments made by Melody Tsai and/or Amy Tsai about his ethnicity.
66. As a result of their position of authority over Mr. Chalhon and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYCHRL, which makes it an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden” by the NYCHRL, or attempt to do so.

67. As a result of Defendant's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering as a direct result of Leg Avenue's conduct.
68. Defendant acted intentionally with malice and reckless indifference to Plaintiff's rights under the NYCHRL and is thereby liable to Plaintiff for punitive damages.

**SEVENTH CAUSE OF ACTION AGAINST LEG AVENUE  
(Hostile Work Environment Based Upon the Religion in Violation of Title VII)**

69. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 68 above with the same force and effect as if fully set forth herein.
70. Mr. Chalhon was subjected to intentional and unwanted discrimination and harassment because of his religion by his managers, Amy and Melody Tsai throughout his employment with Leg Avenue.
71. The discrimination and harassment, based upon his religion, endured by Mr. Chalhon was so constant, severe, hostile, and pervasive, as made evident by the conduct of his managers, that it created an abusive work environment.
72. The discrimination and harassment based upon his religion, as alleged above, the Mr. Chalhon endured negatively affected the terms, conditions, and privileges of employment with Leg Avenue Inc., as he was not allowed to join Leg Avenue's medical insurance plan, he was humiliated, harassed and intentionally harmed, he was

forced to do heavy lifting at trade shows that other similarly-situated employees were not required to do, and, ultimately, he was terminated.

73. The discriminatory termination and harassment alleged herein would have a detrimental effect and would be equally offensive to a reasonable person sharing Mr. Chalhoun's religious beliefs.
74. Defendant knew or should have known about the discriminatory harassment and abusive behavior Plaintiff was subjected to; yet, Defendant refused to act and directly participated in and/or condoned the continuation of his harassment.
75. As a result of Defendant's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering.
76. Defendant acted intentionally with malice and reckless indifference to Plaintiff's rights under Title VII and is thereby liable to Plaintiff for punitive damages under Title VII.

**EIGHTH CAUSE OF ACTION AGAINST LEG AVENUE  
(Hostile Work Environment Based Upon the Ethnicity in Violation of Title VII)**

77. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 76 above with the same force and effect as if fully set forth herein.

78. Mr. Chalhon was subjected to intentional and unwanted discrimination and harassment because of his ethnicity by his managers, Amy and Melody Tsai throughout his employment with Leg Avenue.
79. The discrimination and harassment based upon his ethnicity, as alleged above, that Mr. Chalhon endured was so constant, severe, hostile, and pervasive, as made evident through the conduct of his managers, that it created an abusive environment.
80. The discrimination and harassment, based upon his ethnicity, endured by Mr. Chalhon negatively affected the terms, conditions, and privileges of employment with Leg Avenue, as he was not allowed to join Leg Avenue's medical insurance plan, he was humiliated, harassed and intentionally harmed, he was forced to do heavy lifting at trade shows that other similarly-situated employees were not required to do, and, ultimately, he was terminated.
81. The discriminatory termination and harassment alleged herein would have a detrimental effect and would be equally offensive to a reasonable person of Mr. Chalhon's ethnicity.
82. Defendant knew or should have known about the discriminatory harassment and termination Plaintiff was subjected to; yet, his managers refused to act and directly participated in or condoned the continuation of his harassment.
83. As a result of Defendant's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future

earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering.

84. Defendant acted intentionally with malice and reckless indifference to Plaintiff's rights under Title VII and is thereby liable to Plaintiff for punitive damages under Title VII.

**NINTH CAUSE OF ACTION AGAINST DEFENDANT  
(Hostile Work Environment due to Religion in Violation of the NYSHRL)**

85. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 84 above with the same force and effect as if fully set forth herein.

86. As a result of Defendant's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering.

87. As a result of their position of authority over Mr. Chalhoun and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYSHRL, which makes it an unlawful discriminatory practice "for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden" by the NYSHRL, or attempt to do so.



**TENTH CAUSE OF ACTION AGAINST DEFENDANT  
(Hostile Work Environment due to Ethnicity in Violation of the NYSHRL)**

88. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 87 above with the same force and effect as if fully set forth herein.
89. As a result of Defendant's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering.
90. As a result of their position of authority over Mr. Chalhoun and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYSHRL, which makes it an unlawful discriminatory practice "for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden" by the NYSHRL, or attempt to do so.

**ELEVENTH CAUSE OF ACTION AGAINST DEFENDANT  
(Hostile Work Environment due to Religion in Violation of the NYCHRL)**

91. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 90 above with the same force and effect as if fully set forth herein.
92. As a result of Defendant's discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering.

93. As a result of their position of authority over Mr. Chalhoun and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYCHRL, which makes it an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden” by the NYCHRL, or attempt to do so.

94. Defendant acted intentionally with malice and reckless indifference to Plaintiff’s rights under the NYCHRL and is thereby liable to Plaintiff for punitive damages.

**TWELVTH CAUSE OF ACTION AGAINST DEFENDANT  
(Hostile Work Environment due to Ethnicity in Violation of the NYCHRL)**

95. Plaintiff repeats, reiterates, and re-alleges each and every allegation set forth in paragraphs 1 through 94 above with the same force and effect as if fully set forth herein.

96. As a result of Defendant’s discriminatory acts, as alleged above, Plaintiff has suffered and will continue to suffer substantial losses, including loss of past and future earnings, commissions, and employment benefits; severe emotional distress and mental anguish; and physical pain and suffering.

97. As a result of their position of authority over Mr. Chalhoun and their discriminatory conduct alleged herein, Amy and Melody Tsai are liable as employers and individuals under the NYCHRL, which makes it an unlawful discriminatory practice “for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden” by the NYCHRL, or attempt to do so.

98. Defendant acted intentionally with malice and reckless indifference to Plaintiff's rights under the NYCHRL and is thereby liable to Plaintiff for punitive damages.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests that this Court enter a judgment containing the following relief:

- (a) An order declaring that the acts and practices complained of herein are in violation of Title VII, the NYSHRL, and NYCHRL;
- (b) An order enjoining Defendant from engaging in future unlawful acts of discrimination, harassment, and retaliation;
- (c) An order awarding Plaintiff monetary damages for lost past and future wages, in an amount to be determined at trial, caused by Defendant's unlawful actions;
- (d) An order awarding Plaintiff compensatory damages, in an amount to be determined at trial, as a result of the severe mental anguish, emotional distress, humiliation, and loss of reputation, among other damages, caused by Defendant's unlawful actions;
- (e) An order compelling Defendant to pay punitive damages, in an amount to be determined at trial, to Plaintiff as a result of its intentional and reckless disregard of his protected civil rights;
- (f) An order awarding a monetary amount equal to Plaintiff's reasonable attorneys' fees and costs of this action; and

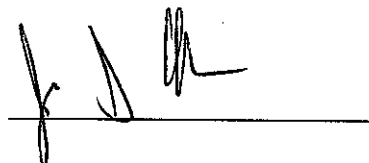
(g) Any such other and further relief that this Court deems just and equitable.

**DEMAND FOR TRIAL BY JURY**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, plaintiff demands a trial by jury in this action.

Dated: July 16, 2013

**LEVINE & BLIT, PLLC**

A handwritten signature in black ink, appearing to read 'Justin S. Clark', is written above a horizontal line.

Justin S. Clark (JC7795)  
*Attorneys for Plaintiff*  
350 Fifth Avenue, Suite 3601  
New York, NY 10118  
Phone: (212) 967-3000  
Fax: (212) 967-3010  
jclark@levineblit.com

**EXHIBIT A**

EEOC Form 161 (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Ron Chalhon
2005 Est 57th Street
Brooklyn, NY 11234

From: New York District Office
33 Whitehall Street
5th Floor
New York, NY 10004

Empty checkbox

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

EEOC Charge No.

EEOC Representative

Telephone No.

520-2013-00518

Jose T. Vega,
Investigator

(212) 336-3682

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- Empty checkboxes for reasons: facts fail to state a claim, no disability, respondent size, filing time.
Checked box (X) for: The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes.
Empty checkboxes for: The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
Empty checkbox for: Other (briefly state)

- 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.

On behalf of the Commission

Signature of Kevin J. Berry
Kevin J. Berry,
District Director

6/25/13
(Date Mailed)

Enclosures(s)

cc: LEG AVENUE, INC
Attn: Director of Human Resources
18240 Senteno Street
Rowland Hgts, CA 91748

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>RON CHALHON,</b>	)	
	)	<b>No.</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>-against-</b>	)	
	)	
<b>LEG AVENUE INC.; AMY TSAI,</b>	)	
<b>Individually; and MELODY TSAI,</b>	)	
<b>Individually;</b>	)	
	)	
<b>Defendants.</b>	)	

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**SUMMONS AND COMPLAINT**

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LEVINE & BLIT, PLLC  
*Attorneys for Plaintiffs*  
350 Fifth Avenue, 36<sup>th</sup> Floor  
New York, New York 10118  
Phone: (212) 967-3000  
Fax: (212) 967-3010

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To: Leg Avenue Inc.  
18240 Senteno Street  
Rowland Heights, CA 91748

Amy Tsai  
18240 Senteno Street  
Rowland Heights, CA 91748

Melody Tsai  
18240 Senteno Street  
Rowland Heights, CA 9174812345

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