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ERIS STASSI

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

ERIS STASSI, individually,

Plaintiff,

v.

CRISIS TEXT LINE, INC., a Nonprofit
Corporation; FALK GOTTLÖB, an individual; and
DOES 1 through 50, inclusive.

Defendants.

Case No. **25CV107842**

COMPLAINT FOR DAMAGES

1. Retaliation in Violation of FEHA (Government Code § 12940, et seq.);
2. Retaliation in Violation of Labor Code § 1102.5;
3. Retaliation in Violation of Labor Code § 98.6;
4. Age Discrimination in Violation of FEHA (Government Code § 12940, et seq.);
5. Gender/Sex Discrimination in Violation of FEHA (Government Code § 12940, et seq.);
6. Hostile Work Environment Harassment in Violation of FEHA (Government Code § 12940, et seq.);
7. Failure to Prevent Discrimination and Harassment in Violation of FEHA (Government Code § 12940, et seq.);
8. Intentional Infliction of Emotional Distress
9. Wrongful Termination in Violation of Public Policy

DEMAND FOR JURY TRIAL

1. Plaintiff ERIS STASSI (“Stassi”) individually, brings this action against Defendant CRISIS TEXT LINE, INC. (“CTL”), a Nonprofit Corporation, FALK GOTTLÖB (“Gottlob”), an individual, and DOES 1 through 50, inclusive.

1 ***PARTIES***

2 2. Plaintiff is, and at all times relevant to this action was, a resident of the City of Oakland,
3 California. At all relevant times Plaintiff was employed by Defendant Crisis Text Line working remotely
4 from Oakland, California. Therefore, the events giving rise to this action arose in Oakland, California,
5 Alameda County.

6 3. Plaintiff is informed and believes, and based thereon alleges, that Defendant Crisis Text
7 Line is a New York not-for-profit corporation doing business in California. Per its website, Crisis Text
8 Line “provides free, 24/7 mental health support via text message” nationwide and internationally.

9 4. Defendant Falk Gottlob is, and at all times mentioned in this Complaint was, an individual
10 residing in California.

11 5. Plaintiff does not know the true names of Defendants Does 1 through 50, inclusive, and
12 therefore sues them by those fictitious names. The names, capacities, and relationships of Defendants
13 Does 1 through 50, inclusive, will be alleged by amendment to this Complaint when the same are known
14 to Plaintiff.

15 6. The true names and capacities, whether individual, corporate, associate or otherwise, of
16 defendants Does 1 through 50 (“Does”), inclusive and each of them, are not known to Plaintiff at this
17 time. Such Does are legally responsible for the events and happenings described herein and for the
18 damages proximately caused thereby. Plaintiff will seek the leave of the Court to amend this complaint to
19 set forth the true names and capacities of any such Does when they have been ascertained.

20 7. On information and belief, at all times mentioned herein, defendants, inclusive and each
21 of them, including without limitation any Does, were acting in concert and participation with each other;
22 were joint participants and collaborators in the acts complained of; and were the agents and/or employees
23 of one another in doing the acts complained of herein, each acting within the course and scope of said
24 agency and/or employment.

25 8. CTL, Gottlob, and Does 1 through 50, inclusive, are collectively referred to hereafter as
26 “Defendants”.

27 ***JURISDICTION AND VENUE***

28 9. This Court has jurisdiction over Defendants because at all times relevant, they were

1 authorized to transact and are transacting business in California.

2 10. Venue is proper in this Court pursuant to Code of Civil Procedure § 395, because the acts,
3 events and omissions complained of herein occurred in Alameda County, California.

4 ***EXHAUSTION OF ADMINISTRATIVE REMEDIES***

5 11. On or about January 22, 2025, Plaintiff obtained a Right to Sue Letter from the California
6 Civil Rights Department attached hereto as Exhibit A.

7 ***GENERAL ALLEGATIONS***

8 12. Eris Stassi (“Stassi”) is a 43-year-old female who began working for Crisis Text Line
9 (“CTL”) on June 27th, 2022, as a Director of Product Design. Ms. Stassi reported to Falk Gottlob
10 (“Gottlob”), Chief Technology Officer, who was hired roughly six months prior to Ms. Stassi. CTL and
11 Gottlob subjected Ms. Stassi to gender discrimination, age discrimination, harassment, and retaliation until
12 her wrongful termination in May of 2023.

13 13. Ms. Stassi was the only female over the age of 40 at her level, which consisted of a team of
14 five. Ms. Stassi and four males, worked directly under Mr. Gottlob’s leadership. Shortly after her
15 employment, Mr. Gottlob began to target Ms. Stassi based on her gender and age. Mr. Gottlob belittled
16 Ms. Stassi’s role at the company. He was dismissive of her design and efforts and provided her with
17 excessive criticism and negative feedback. Mr. Gottlob made it a point to belittle Ms. Stassi or ignore her
18 in front of her peers during their team meetings. Mr. Gottlob did not treat Ms. Stassi’s male counterparts
19 similarly to the way he treated Ms. Stassi.

20 14. On or around September 2022, Mr. Gottlob convened an offsite meeting with senior
21 leadership and the Board of Directors. This was a meeting Ms. Stassi, in a leadership position, should have
22 attended. However, Mr. Gottlob purposely did not tell Ms. Stassi where and when the meeting was to take
23 place. As a result, Ms. Stassi missed the meeting. Later, at a team recap of this offsite meeting, Mr. Gottlob
24 showed the presentation he shared at the offsite meeting which contained slides that Ms. Stassi had
25 prepared about the design department. In the following months, Ms. Stassi found this to be a repeated
26 pattern of behavior – Mr. Gottlob taking credit for Ms. Stassi’s work. Gottlob did not take credit for Ms.
27 Stassi’s male peers’ work.

28 15. During eight feedback sessions with 3-5 attendees, EPD department employees told Ms.

1 Stassi that they feared retaliation and termination if they disagreed with Mr. Gottlob. Many stated they
2 didn't feel "psychologically safe." These complaints showed up in each interview.

3 16. On January 23, 2023, Ms. Stassi met one-on-one with her manager. Ms. Stassi complained
4 that Mr. Gottlob aggressively dominated their one-on-one conversations while being dismissive of her
5 input. Mr. Gottlob cut her off and spoke over her while she talked, he yelled at her, and he micromanaged
6 her. Mr. Gottlob repeatedly commented, "maybe we don't need a design team anymore." Mr. Gottlob
7 repeatedly told Ms. Stassi that the organization didn't need her department. Mr. Gottlob did not make
8 similar comments to Ms. Stassi's male colleagues. As a result of Ms. Stassi's complaints, HR merely
9 advised Ms. Stassi to have a "direct conversation" with Mr. Gottlob to resolve the issues.

10 17. On or around January of 2023, Ms. Stassi reported the team's feedback and concerns of
11 retaliation to HR. Ms. Stassi explained to the Chief People Officer, Dana Trader ("Trader"), that employees
12 felt psychologically unsafe and fearful of retaliation from Mr. Gottlob. Ms. Stassi also complained that
13 Gottlob targeted her because she was an older woman. Ms. Stassi explained her discomfort in confronting
14 Mr. Gottlob and requested HR help to address her concerns with him. Ms. Trader agreed the matter needed
15 to be handled by HR.

16 18. Later in January of 2023, as a direct result of Ms. Stassi reporting Mr. Gottlob's gender and
17 age discrimination and retaliation to HR, Mr. Gottlob upped his retaliation. He excluded Ms. Stassi from
18 her job duties. Mr. Gottlob told the Director of Product, Mario Apodaca ("Apodaca"), to exclude her from
19 product strategy and roadmap planning, an essential function of her role.

20 19. Mr. Gottlob intentionally attempted to isolate Ms. Stassi from her peers as a form of
21 retaliation for her complaint against him.

22 20. Mr. Gottlob allowed Ms. Stassi's younger male counterparts to have access to certain
23 programs or resources while denying Ms. Stassi's access to the same programs and resources.

24 21. On or around February of 2023, Mr. Gottlob was set to conduct Ms. Stassi's Performance
25 Review Meeting. Ms. Stassi requested HR join the meeting due to the continuing discrimination,
26 harassment, and retaliation exhibited by Mr. Gottlob. In the meeting, Mr. Gottlob was disrespectful to Ms.
27 Stassi. Mr. Gottlob told Ms. Stassi that the engineering team was "afraid" of her, he stated she was "really
28 aggressive," he attacked her character, talked negatively about her to colleagues and management, lied

1 about her feedback from others, and dismissed her accomplishments. Mr. Gottlob became dismissive of
2 her profession and contributions based on Ms. Stassi's gender and age. Gottlieb's comments exhibited a
3 strong gender bias. He wanted the women employees to be demure and docile while the males were
4 expected to be aggressive.

5 22. Gottlob's behavior towards Ms. Stassi caused her anxiety, sleepless nights, and physical
6 symptoms such as an upset stomach, and tremors.

7 23. On or around February of 2023, Senior Product Manager, Yvonne Jih ("Jih"), was very
8 upset over Mr. Gottlob's discriminatory, harassing, and retaliatory behaviors towards of Ms. Stassi. Ms.
9 Jih took the initiative to report Mr. Gottlob's treatment of Ms. Stassi to HR on Ms. Stassi's behalf. Ms. Jih
10 confirmed that Mr. Gottlob's negative evaluation of Ms. Stassi was a form of retaliation based on her
11 gender and age.

12 24. On or around February of 2023, HR arranged a meeting with Ms. Stassi regarding Ms. Jih's
13 reports. HR confirmed Mr. Gottlob's negative performance review to be "inaccurate."

14 25. On or around February of 2023, HR arranged a follow-up meeting with Ms. Stassi and Mr.
15 Gottlob. Mr. Gottlob did not provide Ms. Stassi with any actionable or constructive feedback to improve.
16 Mr. Gottlob only stated that success was "when I can trust you again." Ms. Stassi asked Mr. Gottlob what
17 trust looked like to him, and he only responded, "I'll know it when I see it."

18 26. Ms. Trader hosted monthly meetings for managers with a mentorship program for managers
19 to benefit from coaching. Neither Ms. Trader nor Mr. Gottlob afforded Ms. Stassi the opportunity to utilize
20 coaching offered to Ms. Stassi's male colleagues.

21 27. On or around February of 2023, as a form of retaliation, Mr. Gottlob began excessively
22 micromanaging Ms. Stassi following the performance review meetings with HR. Mr. Gottlob told Ms.
23 Stassi's male coworkers "Yes" to the same things he would tell her "No." Mr. Gottlob required everything
24 Ms. Stassi's design team did to be reviewed by him before sharing with the product or engineering teams
25 which directly contradicted CTL's policy of collaboration.

26 28. On or around February of 2023, Engineering Managers, Keith Morris and Nate Rohweder,
27 and Product Managers, Alex Mnatsakanov, Yvonne Jih, and Marissa Huntsman, complained to their
28 directors, Chief Executive Officer, Dena Trujillo ("CEO"), and HR about Mr. Gottlob's discriminatory,

1 harassing, and retaliatory treatment of Ms. Stassi. Mr. Gottlob's requirement of having all design work go
2 through him delayed their process.

3 29. On or around February of 2023, Ms. Stassi requested feedback on the design work. Mr.
4 Gottlob refused to provide her with any feedback. He only stated he "couldn't understand" the documents
5 provided although all Product and Engineering teams understood the work and provided Ms. Stassi with
6 feedback. Mr. Gottlob provided feedback to Ms. Stassi's male colleagues.

7 30. CTL failed to reprimand Mr. Gottlob or assign Ms. Stassi a new manager. Mr. Gottlob
8 continued to criticize and attack Ms. Stassi's character. Mr. Gottlob spoke to Ms. Stassi in a condescending,
9 belittling, and dismissive tone. Mr. Gottlob would reply, "you don't listen." Ms. Stassi suffered from severe
10 anxiety and sleepless nights due to Mr. Gottlob's treatment. HR did not intervene and allowed Mr.
11 Gottlob's discriminatory, harassing, and retaliatory behaviors.

12 31. On or around March of 2023, Ms. Stassi had two meetings with Ms. Trujillo and Ms. Trader.
13 She expressed her concerns and continued to complain about Mr. Gottlob's discriminatory, harassing, and
14 retaliatory behavior towards her. Ms. Stassi noted how he prevented her from successfully doing her job.
15 Mr. Gottlob did not prevent her male colleagues from doing their jobs.

16 32. A week later, Ms. Stassi was blindsided when Mr. Gottlob, in a one-on-one meeting,
17 brought up a concern that Ms. Stassi relayed to HR representatives in confidence. The meeting caused Ms.
18 Stassi so much distress that she had to turn off her camera and ask that the meeting be rescheduled. HR
19 continued to fail to intervene and left Ms. Gottlob's actions unchecked.

20 33. On or around March of 2023, Ms. Stassi had a one-on-one with HR. Ms. Trader had been
21 present at Ms. Stassi and Mr. Gottlob's 1:1 meetings nearly sixteen times for a total of four months and
22 had witnessed firsthand Mr. Gottlob's discriminatory and harassing behavior yet failed to take corrective
23 action to prevent the behavior from continuing.

24 34. On or around March of 2023, as continued retaliation and discrimination, Mr. Gottlob
25 continued to harshly criticize her without providing clear expectations or direction, he tried to create strict
26 deadlines for Ms. Stassi's team while no other team had deadlines. Mr. Gottlob did not treat Ms. Stassi's
27 male counterparts in this same manner. Mr. Gottlob ignored Ms. Stassi for two weeks while she repeatedly
28 requested feedback and asked questions. Mr. Gottlob continued to target Ms. Stassi based on her gender

1 and age.

2 35. On or around April of 2023, Ms. Stassi reported to HR that Mr. Gottlob's treatment towards
3 her was affecting her mental health. She informed Ms. Trader that she did not feel supported at CTL. HR
4 took no action into her claims of discriminatory, harassing, and retaliatory behaviors, and instead, Ms.
5 Stassi was only told to "take the day off." CTL's solution to the discriminatory, harassing, and retaliatory
6 behaviors was avoiding the issues rather than corrective action. In fact, when Ms. Trader went on a week-
7 long vacation, she suggested Ms. Stassi also take a week off so she wouldn't interact with Mr. Gottlob
8 without the Head of HR's presence.

9 36. On April 19, 2023, Ms. Trader allegedly investigated Ms. Stassi's retaliation complaints.
10 This consisted of a mere fifteen-minute interview with Ms. Stassi in which she addressed the
11 discrimination, harassment, and retaliation experienced from Mr. Gottlob's behaviors. Ms. Stassi noted the
12 excessive criticism, micromanagement, and exclusion from her leadership responsibilities, while her male
13 colleagues were not treated in this same manner.

14 37. On April 25, 2023, Ms. Stassi received an email from HR stating that based on Ms. Trader's
15 brief investigation, Ms. Stassi's claims were not substantiated. Ms. Stassi never received any paperwork
16 regarding the investigation.

17 38. On May 3, 2023, CTL fired Ms. Stassi.

18 39. On May 9, 2023, Mr. Gottlob resigned. Director of Engineering, Ricard Cabrera, informed
19 Vice President of Engineering, Max Whitney, that Mr. Gottlob had planned to resign, but he wanted to fire
20 Ms. Stassi before he placed his resignation.

21 40. CTL did not fire younger, male employees, and did not fire employees who remained silent
22 about discrimination they observed at the hands of Mr. Gottlob.

23 41. The foregoing demonstrates that CTL fired Ms. Stassi in retaliation for Ms. Stassi's
24 constantly reporting age and gender discrimination, and retaliation by Mr. Gottlob.

25 42. As a direct result of the discriminatory and harassing treatment by Defendants, Ms. Stassi
26 became upset, depressed, anxious, betrayed and embarrassed. Ms. Stassi is in distress as she cannot sleep
27 at night and finds herself questioning her abilities and her worth. Ms. Stassi stopped cooking for herself,
28 working out, and leaving her apartment due to the stress from work.

43. Defendants discriminated and retaliated against Ms. Stassi based on age and gender discrimination and in violation of Government Code § 12940. Due to such conduct, Defendants caused Ms. Stassi intentional emotional distress, stress, and anxiety.

FIRST CAUSE OF ACTION

Retaliation in Violation of FEHA

(Government Code §12940, et seq.)

(Against Defendant Crisis Text Line, Inc.)

44. Plaintiff re-pleads, re-alleges, and incorporates by reference each allegation set forth in this Complaint.

45. At all relevant times, the California Fair Employment & Housing Act, § 12940, et seq., was in full force and effect, and binding on Defendants.

46. FEHA makes it an unlawful employment practice for an employer to retaliate against an employee who has opposed a forbidden practice or filed a complaint against an employer or supervisor. Government Code §12940(h).

47. Government Code § 12940(h) provides in relevant part:

It is an unlawful employment practice . . . (h) For any employer, labor organization, employment agency, or person to discharge, expel, or toherwise discriminate against any person because the person has opposed any practices forbidden under this part or because the person has filed a complaint, testified, or assisted in any proceeding under this part.

48. Defendants were Plaintiff's employer, and Plaintiff was Defendants' employee.

49. Plaintiff made multiple complaints to Defendants reporting age and gender discrimination, and retaliation for complaining about said discrimination by Mr. Gottlob. Plaintiff was then discriminated against based on her age and gender and denied her to attendace of leadership meetings, excluded her from product strategy and roadmap planning, spoke disrespectfully and demeaningly to Plaintiff, denied Plaintiff's requests to certain programs and resources required for her to perform functions of her job, instructed her to cancel meetings and limited her leadership of her team.

50. Defendants retaliated against Plaintiff by terminating Plaintiff's employment.

51. Plaintiff was harmed.

52. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

53. The conduct of Defendants and each of them as described above was malicious, fraudulent, or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and each of them, and their agents/employees or supervisors, authorized, condoned, and ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to punitive damages against each of said Defendants.

SECOND CAUSE OF ACTION

Retaliation in Violation of Labor Code §1102.5, et seq.

(Against Defendant Crisis Text Line, Inc.)

54. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

55. At all relevant times, California Labor Code was in full force and effect, and binding on Defendants.

56. Labor Code §1102.5 makes it an unlawful for an employer to retaliate against an employee who has for disclosing information the employee reasonable believes discloses a violation of state or federal statute, or a violation of or noncompliance with a local, state, or federal rule or regulation.

57. Plaintiff made multiple complaints to Defendants about gender and age charged discriminatory treatment, retaliation, and harassment by Mr. Gottlob.

58. Defendants retaliated against Plaintiff by terminating her.

59. Plaintiff was harmed.

60. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

61. As a direct and proximate result of the above violations, Plaintiff has suffered damages in the form of past and future wage losses, lost benefits, other pecuniary losses, and emotional distress in an amount to be proven at trial.

62. The conduct of Defendants and each of them as described above was malicious, fraudulent, or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and each of them, and their agents/employees or supervisors, authorized, condoned, and

ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to punitive damages against each of said Defendants.

THIRD CAUSE OF ACTION

Retaliation in Violation of Labor Code § 98.6

(Against Defendant Crisis Text Line, Inc.)

63. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

64. Labor Code § 98.6 provides:

(a) A person shall not discharge an employee or in any manner discriminate, retaliate, or take any adverse action against any employee . . . because the employee . . . engaged in any conduct delineated in this chapter, including . . . Chapter 5 (commencing with Section 1101) of Part 3 of Division 2, or because the employee . . . or because of the exercise by the employee or applicant for employment on behalf of himself, herself, or others of any rights afforded him or her.

(b)(1) Any employee who is discharged, threatened with discharge, demoted, suspended, retaliated against, subjected to an adverse action, or in any other manner discriminated against in the terms and conditions of his or her employment because the employee engaged in any conduct delineated in this chapter, including . . . Chapter 5 (commencing with Section 1101) of Part 3 of Division 2 . . . shall be entitled to reinstatement and reimbursement for lost wages and work benefits caused by those acts of the employer.

65. Defendants were Plaintiff's employer, and Plaintiff was Defendants' employee.

66. Plaintiff made multiple complaints to Defendants reporting age and gender discrimination, and retaliation for complaining about said discrimination by Mr. Gottlob. Plaintiff was then discriminated against based on her age and gender and denied her attendance of leadership meetings, excluded her from product strategy and roadmap planning, spoke disrespectfully and demeaningly to Plaintiff, denied Plaintiff's requests to certain programs and resources required for her to perform functions of her job, instructed her to cancel meetings and limited her leadership of her team.

67. Defendants retaliated against Plaintiff by terminating Plaintiff's employment.

68. Plaintiff was harmed.

69. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

70. Pursuant to Labor Code § 98.6(b)(3), Defendants are liable to Plaintiff for a civil penalty of ten thousand dollars (\$10,000) for each violation.

71. The conduct of Defendants and each of them as described above was malicious, fraudulent, or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and each of them, and their agents/employees or supervisors, authorized, condoned, and ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to punitive damages against each of said Defendants.

FOURTH CAUSE OF ACTION

Age Discrimination in Violation of FEHA

(Government Code § 12940, et seq.)

(Against Defendant Crisis Text Line, Inc.)

72. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

73. Government Code § 12940(a) provides in relevant part:

It is an unlawful employment practice. . . (a) [f]or an employer, because of the race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status of any person, to refuse to hire or employ the person or to refuse to select the person for a training program leading to employment, or to bar or to discharge the person from employment or from a training program leading to employment, or to discriminate against the person in compensation or in terms, conditions, or privileges of employment.

74. At all times herein mentioned, Government Code § 12940, et seq. was in full force and effect and binding upon Defendants, and each of them. These laws make it an unlawful employment practice to discriminate against any employee on the basis of her age.

75. Defendants were Plaintiff's employer.

76. Plaintiff was a female over the age of 40.

77. Plaintiff was able to perform the essential job duties of Plaintiff's position.

78. Throughout the period of Plaintiff's employment, Plaintiff was discriminated against by

1 reason of her age, and was subjected to harassment, discrimination and retaliation by Defendants.

2 79. Defendants wrongfully discriminated against Plaintiff based on her age.

3 80. Defendants continually offered other employees of the younger age to attend planning
4 meetings and opportunities to go to conferences and share their work than they offered or allowed for
5 Plaintiff.

6 81. Such actions were in direct violation of Government Code § 12940 and were done with
7 the intent of depriving Plaintiff of his rights to equal employment opportunity and for the purpose of
8 depriving Plaintiff of the benefits of his employment.

9 82. Defendants engaged in the aforementioned unlawful actions, including but not limited to
10 discrimination, harassment and retaliation on the basis of Plaintiff's age.

11 83. Despite being aware of the discriminatory treatment of Plaintiff, Defendants failed to take
12 any steps to prevent or correct the misconduct.

13 84. Plaintiff believes and alleges that Plaintiff's age and gender were a substantial and
14 determining factor in Defendants' decision to terminate Plaintiff's employment.

15 85. Defendants' termination of Plaintiff as alleged in this complaint constitutes an
16 unlawful employment practice in violation of Government Code § 12940(a).

17 86. As direct, foreseeable, and proximate results of Defendants' discriminatory acts, Plaintiff
18 has suffered and continues to suffer substantial losses in earnings and job benefits, and has suffered and
19 continues to suffer humiliation, embarrassment and mental and emotional distress, and discomfort, all to
20 Plaintiff's damage in an amount to be proven at trial.

21 87. Under Government Code § 12940, Plaintiff is entitled to recover Plaintiff's economic and
22 noneconomic damages caused by Defendants' unlawful practices. Plaintiff is also entitled to reasonable
23 attorney's fees and costs pursuant to Government Code § 12965.

24 88. The conduct of Defendants and each of them as described above was malicious, fraudulent,
25 or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and each
26 of them, and their agent/employees or supervisors, authorized, condoned, and ratified the unlawful conduct
27 of each other. Consequently, Plaintiff is entitled to punitive damages against each of said Defendants.

28 ***FIFTH CAUSE OF ACTION***

Gender/Sex Discrimination in Violation of FEHA

1 (Government Code § 12940, et seq.)

2 (Against Defendant Crisis Text Line, Inc.)

3 89. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set
4 forth in this Complaint.

5 90. Government Code § 12940(a) provides in relevant part:

6 It is an unlawful employment practice . . . (a) [f]or an employer, because of
7 the . . . sex, gender . . . of any person . . . to discharge the person from
8 employment . . . or to discrimination against the person in compensation or
in terms, conditions, or privileges of employment.

9 91. Plaintiff is female.

10 92. Plaintiff was subjected to unwelcome gender discrimination.

11 93. Defendants was Plaintiff's employer, and Plaintiff was Defendants' employee.

12 94. Plaintiff were constantly harassed by her male supervisor, Mr. Gottlob. This harassment
13 included ignoring and dismissing Plaintiff, denying her attendance of leadership meetings, excluding her
14 from product strategy and roadmap planning, speaking disrespectfully and deameaningly to Plaintiff,
15 denying Plaintiff's requests to certain programs and resources required for her to perform fuctions fo her
16 job, and limiting her leadership of her team. All of which were allowed or not directed to to male
17 counterparts in lower roles or on her team.

18 95. Throughout her employment, Plaintiff made multiple complaints to Defendants about the
19 harassment and discrimination she received from her male supervisor, Mr. Gottlob. Despite Plaintiff's
20 complaints of the harassment, Defendants did not remedy the situation.

21 96. Plaintiff suffered harm when she was discriminated against by Defendants.

22 97. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

23 98. Under Government Code § 12940, Plaintiff is entitled to recover economic and
24 noneconomic damages caused by Defendants' discriminatory practices based on Plaintiff's gender and
25 violation of the Fair Employment and Housing Act. Plaintiff is also entitled to reasonable attorney's fees
26 and costs pursuant to Government Code § 12965.

27 99. As a result of Defendants' discriminatory treatement Plaintiff suffered emotional distress
28 and felt humiliated, embarrassed, anxious, and depressed.

100. The conduct of Defendants and each of them as described above was malicious, fraudulent, or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and each of them, and their agents/employees or supervisors, authrozied, condoned, and ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to punitive damages against each of said Defendants.

SIXTH CAUSE OF ACTION

Hostile Work Environment Harassment in Violation of FEHA

(Government Code § 12940, et seq.)

(Against All Defendants)

101. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set forth in this Complaint.

102. Defendants, and each of them, either individually and/or through their agents, engaged in the foregoing conduct, which constitutes a pattern and practice of hostile work environment harassment in violation of Government Code § 12940(j), which provides that harassment of employees is an unlawful employment practice.

103. Plaintiff endured harassing conduct by Defendants and/or Defendants' managers, that took place in Plaintiff's immediate work environment.

104. Plaintiff considered the work environment to be hostile or abusive towards people that are over the age of 40, female, and anyone who complained about discrimination or retaliatory behavior with the company.

105. Plaintiff's supervisor engaged in the conduct.

106. Defendants knew or should have known of the conduct and failed to take any corrective action whatsoever, let alone immediate appropriate corrective action.

107. The above-described acts and conduct by Defendants proximately caused Plaintiff damages and injury in an amount to be proven at trial.

108. The conduct of Defendants and each of them as described above was malicious, fraudulent, or oppressive and done with a willful and conscious disregard for Plaintiff's rights. Defendants and each of them, and their agents/employees or supervisors, authorized, condoned, and ratified the unlawful

1 conduct of each other. Consequently, Plaintiff is entitled to punitive damages against each of
2 said Defendants.

3 ***SEVENTH CAUSE OF ACTION***

4 *Failure to Prevent Discrimination and Harassment in Violation of FEHA*

5 *(Government Code § 12940, et seq.)*

6 *(Against Defendant Crisis Text Line, Inc.)*

7 109. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set
8 forth in this Complaint.

9 110. Government Code §12940(m)(2) provides in relevant part:

10 It is an unlawful employment practice . . . (k) For an employer . . . to fail to
11 take all reasonable steps necessary to prevent discrimination and harassment
12 from occurring.

12 111. Defendants wrongfully failed to take all reasonable steps necessary to prevent harassment
13 and discrimination of Plaintiff based on her age and gender.

14 112. Plaintiff suffered and continues to suffer harm as a result of Plaintiff's discharge by
15 Defendants.

16 113. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

17 114. Under Government Code § 12940, Plaintiff is entitled to recover Plaintiff's economic and
18 noneconomic damages caused by Defendants' unlawful practices. Plaintiff is also entitled to reasonable
19 attorney's fees and costs pursuant to Government Code § 12965.

20 115. The conduct of Defendants and each of them as described above was malicious,
21 fraudulent, or oppressive and done with a willful and conscious disregard for Plaintiff's rights.
22 Defendants and each of them, and their agents/employees or supervisors, authorized, condoned, and
23 ratified the unlawful conduct of each other. Consequently, Plaintiff is entitled to punitive damages
24 against each of said Defendants.

25 ***EIGHTH CAUSE OF ACTION***

26 *Intentional Infliction of Emotional Distress*

27 *(Against Defendant Falk Gottlob)*
28

1 116. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set
2 forth in this Complaint.

3 117. Defendant's treatment of Plaintiff as discussed supra, exceeds the bounds of decency, is
4 intolerable within our civilized community, and is therefore outrageous.

5 118. Defendant's actions, as discussed supra, were intended to cause Plaintiff to suffer the
6 resulting emotional distress.

7 119. Defendants succeeded in their attempt to cause Plaintiff to suffer extreme emotional
8 distress, as indicated by the lingering anxiety, stress, depression, lethargy, finding herself upset, inability
9 to leave her house or socialize, insomnia, and embarrassment, that are the direct and proximate results of
10 Defendant's conduct.

11 120. Plaintiff was harmed.

12 121. Defendant's conduct was a substantial factor in causing Plaintiff's harm.

13 122. The conduct of Defendant as described above was malicious, fraudulent, or oppressive
14 and done with a willful and conscious disregard for Plaintiff's rights. Defendant and each of them, and
15 their agents/employees or supervisors, authorized, condoned and ratified the unlawful conduct of each
16 other. Consequently, Plaintiff is entitled to punitive damages against Defendant.

17 ***NINTH CAUSE OF ACTION***

18 *Wrongful Termination in Violation of Public Policy*

19 *(Against Defendant Crisis Text Line, Inc.)*

20 123. Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set
21 forth in this Complaint.

22 124. Art. I, § 8, of the California Constitution provides that a person may not be disqualified
23 from pursuing a profession or employment because of their age or race.

24 125. At all times herein mentioned in this complaint, California Government Code Section
25 12940 (a), was in full force and effect and were binding on the Defendants and the Defendants were
26 subject to their terms, and therefore Defendant was required to refrain from violations of public policy,
27 including discrimination based on age, gender, and race in violation of FEHA and in retaliation for
28

1 complaining of said discrimination.

2 126. Defendants were Plaintiff's employer, and Plaintiff was Defendants' employee.

3 127. Defendant terminated Plaintiff in violation of Plaintiff's rights and public policy.

4 128. Plaintiff is informed and believes and thereon alleges that her protected status
5 (age/gender) and/or her protestation against being discriminated against based on said protected status as
6 alleged above, were, in part, factors in Defendants' decision to terminate Plaintiff's employment.

7 129. Plaintiff was harmed.

8 130. Defendants' conduct was a substantial factor in causing Plaintiff's harm.

9 131. As a proximate result of Defendants' conduct, Plaintiff has suffered special damages in the
10 form of lost earnings, benefits and/or out of pocket expenses in an amount according to proof at the time
11 of trial. As a further direct and proximate result of Defendants' conduct, Plaintiff will suffer additional
12 special damages in the form of lost future earnings, benefits and/or other prospective damages in an
13 amount according to proof at the time of trial.

14 132. As a further direct and proximate result of Defendants' conduct, Plaintiff has suffered loss
15 of financial stability, peace of mind and future security, and has suffered embarrassment, humiliation,
16 mental and emotional pain and distress and discomfort, all to his detriment and damage in amounts not
17 fully ascertained but within the jurisdiction of this court and subject to proof at the time of trial.

18 133. In violation of public policy, Defendants terminated Plaintiff because she is 43-year-old
19 female who was wrongfully terminated, despite the fact that Defendants knew that Plaintiff was
20 experienced and able to perform the essential functions of her position and had done so since June of
21 2022 as a Director of Product Design.

22 134. The conduct of Defendants as described above was malicious, fraudulent, or oppressive
23 and done with a willful and conscious disregard for Plaintiff's rights. Defendant and each of them, and
24 their agents/employees or supervisors, authorized, condoned and ratified the unlawful conduct of each
25 other. Consequently, Plaintiff is entitled to punitive damages against each of said Defendants.

26 **PRAYER FOR RELIEF**

27 **WHEREFORE**, Plaintiff prays for judgment against the Defendants, and each of them, as
28 follows:

1. Compensatory damages including emotional distress damages and lost wages, benefits and interest in a sum according to proof;
2. Interest on judgment, including prejudgment interest, at the legal rate;
3. Punitive damages in a sum according to proof;
4. Attorney's fees and costs; and
5. For any further legal and equitable relief, the Court deems proper.

Dated: January 22, 2025.

RATNER MOLINEAUX, LLP



David S. Ratner
Shelley A. Molineaux
Attorneys for Plaintiff Eris Stassi

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial of his claims by jury to the extent authorized by law.

Respectfully submitted,

Dated: January 22, 2025.

RATNER MOLINEAUX, LLP



David S. Ratner
Shelley A. Molineaux
Attorneys for Plaintiff Eris Stassi