

Name of Plaintiff
Plaintiff *in Propria Persona*
(insert address)

**IN AND FOR THE SUPERIOR COURT, ORANGE COUNTY
STATE OF CALIFORNIA**

YOUR NAME

PLAINTIFF

v.

CASE NO. _____

TRADER JOE'S COMPANY

DEFENDANT

_____ /

COUNT I – COMPLAINT FOR INJUNCTION

Plaintiff, YOUR NAME, sues the defendant, TRADER JOE'S COMPANY, for injunctive relief and alleges the following:

JURISDICTION AND VENUE

This Court has jurisdiction over this action pursuant to Article VI of the California Constitution and California Code of Civil Procedure. Venue is proper as the plaintiff and defendant reside or conduct business within Orange County, California.

The plaintiff resides in Orange County, California, and his mailing address is

_____.

The defendant is California corporation doing business under the name TRADER JOE'S COMPANY at the address of 25410 Marguerite Parkway, Mission Viejo, CA 92692.

STATEMENTS OF FACT

The plaintiff is a regular customer and patron of the defendant at its address.

The defendant has begun directing its employees to inform the plaintiff, before and upon entering the defendant's place of business, that he is required to apply a medical device over his nose and mouth, thereby unsafely restricting the flow of oxygen, and causing the accumulation of bacteria and carbon dioxide, as a condition of being in the

store and purchasing products and receiving services.

On December 9th, 2020 the plaintiff visited one of the defendant's places of business located at 25410 Marguerite Parkway, Mission Viejo, CA 92692. Upon entering the store, Sarah R., manager of the store, approached the plaintiff and informed him that he is required to undertake a medical intervention as a condition of shopping at the store. The plaintiff informed the manager that he was within the protected class and continued to enter the store.

A moment later, the plaintiff was approached by Erik L. and informed that he was required to apply a medical device over his airway and restrict airflow or change the chemical composition of the air he naturally breathes, as a condition of continuing to complete his shopping or being able to check out.

The defendant has also begun applying decals and other directional signs and erecting barriers throughout its business thereby requiring the plaintiff to restrain his movement and to remain six feet from other patrons, thereby restraining his liberty and freedom of movement.

The events giving rise to this complaint took place at defendant's place of business on December 9th, 2020. The defendant continues to engage in the acts alleged herein.

The defendant is required to implement policies that comply with state laws, including the Unruh Civil Rights Act of 1959, and its employees are prohibited from violating the medical treatment rights of the plaintiffs, including but not limited to the Patient's Bill of Rights regarding informed consent and the unlicensed practice of medicine.

The plaintiff is not required to disclose his medical condition or the nature of any disability or health to the defendant as a condition of entering its business or receiving services. The defendant is a private business that is open to the public and is a public accommodation. The defendant is thereby not a private membership association.

The plaintiff did however advise the defendant that he is within a protected class to which the defendant's manager, Erik L. replied, it's not my call, I have to enforce the rules or lose my job.

The California Civil Code 51, known as the Unruh Civil Rights Act states that:

“All persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever.”

Applying a medical device to one’s face that restricts normal air flow, oxygen intake and accumulates bacteria and carbon dioxide is a medical intervention. It is an unsafe medical intervention as fifty years of research by the Occupational Safety Health and Health Administration has established. The safety protocol and standards for such a medical intervention are regulated under 29 CFR §1910.134 and the defendant never complied with any provision of this regulation.

The safety standards of the Occupational Safety and Health Administration, 29 CFR §1910.134 have established by decades of scientific study, that wearing a mask dangerously restricts the flow of oxygen and may result in permanent brain damage, organ failure, bacterial infections such as pleurisy and even death. This is further demonstrated by a letter dated April 2nd 2007, from Richard E. Fairfax, the Director of OSHA Enforcement Programs, answering the question regarding OSHA’s interpretation of the respiratory protection standard, 29 CFR §1910.134, a true and correct copy of which is attached as Exhibit B.

California Business and Professions Code 2052 makes it a crime to engage in the unauthorized practice of medicine (without a valid license) and imposes civil and criminal penalties upon anyone giving medical advice or examinations without a license and the proper insurance and training.

The law prohibits the following conduct:

- a. Practicing, attempting to practice, or advertising oneself as practicing any system of treating illness or affliction; and,
- b. Diagnosing, treating, operating on, or prescribing for any physical or mental condition; and,
- c. Engaging in a conspiracy to—or aiding and abetting someone else to—do any of those things.

The California Health and Safety Code Sections 1599-1599.4, known as the “California Patient’s Bill of Rights”, requires that the plaintiff be given the ability to make informed consent as to whether or not he should accept such medical advice or participate in any medical examination or disclose any medical information or vital statistics.

ALLEGATIONS

The plaintiff re-states the foregoing and incorporates each statement herein and further alleges the following:

The defendant’s violations of its own policies and thereby violating these laws creates unsafe and hazardous conditions.

Irreparable injury will result if the injunction is not granted.

The health and well-being of the plaintiff and other patrons, vendors and employees complying with the defendant’s illegal actions may result in many people acquiring deadly bacterial infections such as pleurisy, and organ failure, or permanent brain damage and possibly death. People are being given medical advice and subjected to medical examinations by the defendant’s employees who have no medical training and who have never obtained any medical licensing or practiced medicine of any kind.

Additionally, the defendant’s violations of the pertaining laws also creates the possibility of violent confrontations with customers entering via the front door. The defendant’s violations may also create unsafe situations for the plaintiff and other patrons and personnel.

State law requires medical licensing and the appropriate insurance for this conduct and patrons have the right to informed consent which the defendant is unable to provide.

The defendant has no knowledge of the plaintiff’s medical condition or disability, yet purports to advise the plaintiff to act upon its medical advice.

This can all be avoided if the defendant is enjoined from continuing to violate its own written policies and correct its instructions to its employees and begin complying with it’s own policies and the pertinent and applicable laws and regulations.

The defendant demands that the plaintiff acts upon its medical advice without any professional responsibility or accountability such as licensing or insurance or any type of medical training.

The defendant's written policies require the defendant to comply with all pertinent laws and regulations and this conduct, while violating the defendant's own policies, violates state law.

The plaintiff has no other adequate remedy at law and there is no other adequate remedy at law.

The plaintiff is a frequent patron of the defendant and has a clear legal right to the requested relief.

The plaintiff has a likelihood of success on the merits because the defendant's written business policies are perfectly consistent with state law, federal law and the applicable regulations, including but not limited to the foregoing facts and allegations.

Additionally, the plaintiff, just like other members of the community has the right to rely upon the written and published business policies and practices of the defendant, certainly when those policies require the defendant to comply with the law.

Likewise, the public interest will be served by the requested injunction, in part for the reason that the defendant is patronized by hundreds of other local residents and some tourists each week, all having the same or similar experience as the plaintiff has alleged herein.

Additionally, any bond requirements that may apply to the relief sought in this complaint have been waived or expressly waived by the defendant.

REQUESTED RELIEF

WHEREFORE, plaintiff respectfully requests an injunction against the defendant, enjoining the defendant from breaching its own company policy and enjoining the defendant from violating the pertinent laws and regulations set forth herein.

COUNT II – COMPLAINT FOR HARASSMENT

Plaintiff, Martin Yewchuk, re-alleges the foregoing statements and allegations from Count I and incorporates each herein, and sues the defendant, TRADER JOE'S COMPANY for harassment and alleges the following:

JURISDICTION AND VENUE

This Court has jurisdiction over this action pursuant to Article VI of the California

Constitution and California Code of Civil Procedure. Venue is proper as the plaintiff and defendant reside or conduct business within Orange County, California.

The plaintiff resides in Orange County, California, and his mailing address is

The defendant is California corporation doing business under the name TRADER JOE'S COMPANY at the address of 25410 Marguerite Parkway, Mission Viejo, CA 92692.

STATEMENTS OF FACT

The plaintiff re-alleges and incorporates each statement of fact from Counts I into this count for harassment and into the following facts.

On December 9th, 2020, upon entering the defendant's place of business, the defendant's store manager, Sarah R., began intimidating and harassing the plaintiff to put on a medical device in order for him to be in the store and to continue shopping for his groceries.

While plaintiff continued to shop, as he has done for the past 9 months, defendant's store manager, Erik L., sought out and approached plaintiff and began harassing plaintiff by bullying him with threats that he will not be allowed to check out and should not even be in the store without a mask on his face.

The plaintiff did not succumb to the harassment and bullying demands and stated that he was not wearing a mask due to his medical condition and that the defendant was in violation of plaintiff's civil rights, under California Civil Code 51, and continued to shop.

The defendant's store manager falsely reported a crime to the police, accusing the plaintiff of committing a crime when there was no violation, in order to impose its unlawful medical treatments upon the plaintiff or harass him so that he would submit to the unlawful medical intervention.

Defendant repeatedly committed acts and engaged in a course of conduct which alarmed and seriously annoyed the plaintiff, including but not limited to verbal harassment regarding the defendant's mask-wearing rituals.

The defendant's conduct had no other legitimate purpose other than annoying and harassing the plaintiff.

The statement of the plaintiff's affidavit is incorporated herein.

ALLEGATIONS

The plaintiff re-alleges and incorporates each of the foregoing statements of fact and allegations into this count for harassment and alleges the following.

The defendant's employees have engaged in verbal abuse regarding defendant's mask-wearing requirements in response to which the plaintiff was followed, singled-out, threatened, detained, lectured to, and felt coerced and intimidated.

The plaintiff was humiliated and made to feel like a common criminal, especially when asked to wait outside like a dog, while other customers were allowed to shop and check out with their groceries.

As a result of the plaintiff's experiences at the store (defendant), and the subsequent threats of being refused entry, the plaintiff has experienced difficulty in sleeping due to worry and anxiety, as well as many hours of research and letter-writing spent trying to resolve the issue.

REQUESTED RELIEF

WHEREFORE, the plaintiff respectfully requests an injunction against the defendant for its harassment such that it shall be henceforth enjoined from harassing, threatening or intimidating the plaintiff when visiting the defendant's place of business, and for costs, attorney fees and other relief deemed appropriate by the court.

COUNT III – COMPLAINT FOR VIOLATIONS OF CALIFORNIA UNRUH CIVIL RIGHTS ACT

The plaintiff, _____, sues the defendant, TRADER JOE'S COMPANY, for violations of the Unruh Civil Rights Act of 1959 and injunctive relief against the defendant's unlawful acts and alleges the following:

JURISDICTION AND VENUE

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The plaintiff resides in Orange County, California, and his mailing address is

_____.

The defendant is California corporation doing business under the name TRADER JOE'S COMPANY at the address of 25410 Marguerite Parkway, Mission Viejo, CA 92692.

STATEMENTS OF FACT

The plaintiff re-states and re-alleges the foregoing and the plaintiff's affidavit herein.

ALLEGATIONS

Plaintiff re-alleges the foregoing statements of fact and incorporates each fact herein and further alleges the following,

The defendant unlawfully discriminated against the plaintiff by denying his claims that he was protected under the Civil Rights Act because of a medical condition or disability.

The defendant's store managers, Sarah R. and Erik L., refused to make any accommodation for the plaintiff other than for him to leave the store without purchasing his groceries, comply with their mask wearing rule as a condition to shop and check out with his groceries or take his credit card and cart of groceries from him, while he waited outside like a dog for the managers to complete his business transaction in order to buy his groceries.

The plaintiff is in a protected class of people who is protected by the California Unruh Civil Rights Act of 1959.

The California Civil Code 51, known as the Unruh Civil Rights Act states that:

"All persons within the jurisdiction of this state are free and equal, and no matter what their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status are entitled to the full and equal accommodations, advantages, facilities, privileges, or services in all business establishments of every kind whatsoever."

The defendant deliberately and intentionally and with full knowledge violated this state law and the rights of the plaintiff.

A violation of the Americans with Disabilities Act is a violation of the California Unruh Civil Rights Act of 1959.

The Americans with Disabilities Act of 1990 or ADA (42 U.S.C. § 12101) is a civil rights law that prohibits discrimination based on disability. It affords similar protections against discrimination to Americans with disabilities as the Civil Rights Act of 1964,[1] which made discrimination based on race, religion, sex, national origin, and other characteristics illegal, and later sexual orientation. In addition, unlike the Civil Rights Act, the ADA also requires covered employers to provide reasonable accommodations to employees with disabilities, and imposes accessibility requirements on public accommodations.¹

Again, the defendant deliberately and intentionally and with full knowledge violated this state law and the rights of the plaintiff.

Defendant is a public accommodation and not a private membership association.

The defendant's requirement to wear a mask negligently injured the plaintiff, under circumstances that were unreasonable, unwarranted and without legal authority and thereby the defendant caused harm to the plaintiff.

The defendant's actions purposefully denied the plaintiff equal access to the store facility and its services to which he was a long-time customer.

The defendant acted with the knowledge of the legal violations.

Plaintiff demands a jury trial.

WHEREFORE, plaintiff demands judgment against the defendant, enjoining the defendant from continuing to violate the plaintiff's rights, or in any manner, and for costs and attorney fees and other relief as this court deems appropriate.

COUNT IV – COMPLAINT FOR INJUNCTIVE RELIEF

AGAINST FALSE IMPRISONMENT

The plaintiff, _____, sues the defendant, TRADER JOE'S COMPANY, for injunctive relief against the defendant's acts constituting false imprisonment and alleges the following:

JURISDICTION AND VENUE

This Court has jurisdiction over this action pursuant to Article VI of the California

Constitution and California Code of Civil Procedure. Venue is proper as the plaintiff and defendant reside or conduct business within Orange County, California.

The plaintiff resides in Orange County, California, and his mailing address is

The defendant is California corporation doing business under the name TRADER JOE'S COMPANY at the address of 25410 Marguerite Parkway, Mission Viejo, CA 92692.

STATEMENTS OF FACT

The defendant has begun directing its employees to inform the plaintiff, before and upon entering the defendant's place of business, that he is required to apply a medical device over his nose and mouth, thereby unsafely restricting the flow of oxygen, and causing the accumulation of bacteria and carbon dioxide, as a condition of being in the store and purchasing products and receiving services.

On the date of December 9th, 2020, the plaintiff visited the defendant's place of business, TRADER JOE'S COMPANY, located at the address of 25410 Marguerite Parkway, Mission Viejo, CA 92692. Upon entering the store, defendant's store manger, Sarah R. approached the plaintiff and demanded that he either undertake a medical intervention as a condition of being in the store, shopping and being allowed to check out and pay for his groceries.

The defendant did not cite any legal authority for this condition and did not cite any exemption for the requirement of a license to give medical advice or engage in medical interventions. The defendant also failed to describe any medical necessity for the intervention or provide any information establishing any medical efficacy for complying with such request.

During the plaintiff's shopping experience, while waiting in the check out line, he was approached by 3 armed Orange County Sheriff Deputies. Deputy Hansen stated that they were "cuz you're not wearing a mask and they want you to wear one." Deputy Coco interjected, "If they don't want you to be here and they want to say that you're trespassing, then they have every right to have you thrown out." Deputy Hansen further explained that this was a "private store and they get to set the guidelines for what happens in here and it is the consumer's job to follow those guidelines."

One of the more important false statements given to defendant's employees is that they are told that because the defendant is a private business, it can implement any policies, no matter what. Yes, the defendant is a private business, but it is a public accommodation and is subject to the laws and regulations just like every other resident business in the state, county and city.

It is not disputed that while the defendant can implement any of its own policies, these policies cannot violate any law. Specifically, the defendant is precluded by law from engaging in the unlicensed practice of medicine and certainly not forced medical interventions or examinations such as mask-wearing and temperature taking. This is no different than if the defendant wanted to produce a fireworks display in its parking lot without a permit. First of all, there is likely no permit for this and second of all, the defendant is not qualified or insured for such activities.

ALLEGATIONS

Plaintiff re-alleges the foregoing statements of facts and incorporates each fact herein and further alleges as follows.

The defendant intentionally restrained the plaintiff, under circumstances that were unreasonable, unwarranted and without legal authority and thereby the defendant caused harm to the plaintiff. The defendant made a false report to the Orange County Sheriff's Department claiming that the plaintiff was being argumentative and refusing to leave, yet cited no violation.

The plaintiff was never asked to leave by any of the defendant's employees at any time during his shopping experience.

The Orange County Sheriff's Department's Deputies, Hansen - Badge #10287, Coco - Badge #8520, Kinney - Badge #9399 and Eliason - Badge #9031, participated in this false imprisonment by detaining the plaintiff with no evidence of a violation.

The defendant's actions purposefully restrained the plaintiff, and the defendant acted with the knowledge that such restraint would, to a substantial certainty, result from the act. The defendant intentionally restrained the plaintiff from entering the grocery store.

The defendant did not act under color of law or claim of lawful authority as there

was no violation and the plaintiff was never accused of committing any violation.

The defendant unlawfully restrained the plaintiff without consent or legal justification. The defendant unlawfully restrained the plaintiff by its actions, words or both its actions and words.

At the time and place of the incident, the defendant deprived the plaintiff of his liberty without sufficient legal authority.

Neither the defendant nor either of its employees were known to be, and never claimed or announced that either was a peace officer.

The defendant felt threatened when confronted by defendant's employees, and felt humiliated, bullied and harassed when confronted by defendant's employees.

The defendant detained the plaintiff or restrained the plaintiff against his will.

The detention or restraint of the plaintiff was unlawful and without any legal authority.

The defendant along with each and every one of its employees and agents participated in the false imprisonment of the plaintiff and are each jointly and severally liable.

WHEREFORE plaintiff demands judgment against the defendant, enjoining the defendant from continuing to falsely imprison the plaintiff in the manner alleged herein, or in any manner, for costs and attorney fees and other relief as this court deems appropriate.

DATED this 18 day of December 2020.

Martin Yewchuk, Plaintiff

Martin Yewchuk
Plaintiff *in Propria Persona*
26366 Lombardy Road
Mission Viejo, CA 92692

IN AND FOR THE SUPERIOR COURT, ORANGE COUNTY

STATE OF CALIFORNIA

MARTIN YEWCHUK

PLAINTIFF

v.

CASE NO. _____

TRADER JOE'S COMPANY

DEFENDANT

_____ /

AFFIDAVIT OF MARTIN YEWCHUK IN SUPPORT OF COMPLAINT

STATE OF CALIFORNIA)

) ss

COUNTY OF ORANGE)

I, Martin Yewchuk, do hereby solemnly affirm that the statements herein are true and correct in substance and in fact and that I have personal knowledge of each.

There is no evidence appearing anywhere that the affiant is a direct threat to any other person.

There is no evidence of any physician's affidavit having been provided to the department of health or any public health officer identifying the affiant as having any communicable disease or having been exposed to any toxic substance.

There is no evidence of any court order, obtained by any petition of the Department of Health or a public health officer, that was based upon any physician's affidavit in which the affiant was identified as having any communicable disease or having been exposed to any toxic substance.

There is no evidence of any court order determining that the affiant is a direct threat to anyone.

There is no evidence of any court order imposing any terms of isolation or quarantine or other measures upon the affiant.

I went to get groceries at Trader Joe's on Wednesday, December 9, 2020. On my way into the store, I was met by Sarah R., the store manager. She said, hey sir you need to have a face covering and I replied, I don't need one. I continued on into the store and placed my returns on the manager's counter. When I turned around, Sarah R. had followed me into the store and began harassing and bullying me to go and get a mask in order to be inside the store and shop for groceries. I replied, I have a medical condition, so I can't wear one. Sarah said the rules have changed and you cannot be in here without a mask. I replied, I have a medical condition and continued shopping.

There has been no issue with me shopping there for the past 9 months, as the manager, Erik L., knows that I have a medical condition that does not allow me to wear face covering.

As I was shopping, I was singled out, interrupted and harassed by store manager, Erik L., who said, you are not suppose to be in here without a mask and they're not going to let you check out due to a change in the rules; he informed me he needed to enforce this new rule or he would lose his job. I informed him that I cannot be discriminated against due to my medical disability and to deny me service would be in violation of CA Civil Code 51 and that I was going to continue to get my groceries and go to the checkout. He let me know that it was not his call on this night because he was not the manager in charge and would defer to the manager that was in charge as to how this was going to be handled.

I continued to shop for my groceries and arrived at the checkout line, where I was waiting to be directed to a cashier station by the tall, dark haired employee who was tending the line. He ignored my presence for awhile, so I asked, which one do you want me to go to? He ignored me. I asked, are you supposed to direct me to some place to go? He replied, we can't ring you up right now, unfortunately, sorry about that. At that point, I asked to speak with the manger on duty and he said, okay, I will get the manager over here.

The manager on duty, Sarah R., came over and said they would not be able to

check me out today. I asked her, are you denying me service? To which she replied, yes. I asked, based on what? Sarah said, based on the new ordinance that has been passed due to the stay at home orders. I asked, so you get to make this decision? Sarah replied, no, my corporate office made that decision and they let us know that we are not to ring up anyone who is not wearing a mask. I replied, so you are denying me service because I can't put on a medical device, which this is. Do you have a doctor that is going to advise me on how to wear it? Sarah said, no, I don't. I replied, okay, so my medical condition precludes me from wearing a mask, because it obviously restricts airflow, oxygen... if I pass out, are you going to be liable for what happens to me? Sarah said, I don't know. I stated, well of course, we all know that if I pass out in your store based on rules that you are enforcing upon me... of course you are liable; not only is the company liable, but you are personally liable. You realize this is an infringement of my rights not to be able to shop just like everybody else.

This is no different than discriminating against the color of my skin, or what I choose to wear on my t-shirt... it doesn't matter. Sarah said, I didn't make the decision for the company. I replied, but, you are enforcing it. Sarah said, yes, in order for me to keep my job I have to.

I stated, every time I have come in to shop, I have totally acquiesced to whatever was asked of me... you gave me a personal shopper, fine, you want me to move quickly, stay six feet away, whatever... but I need to buy food for my family, just like you do... so this is an infringement upon my rights and abilities to do that. It's illegal. You can't do that. But what you are enforcing is not a law. It's not a law, so you can't enforce it. You are breaking the law by refusing to serve me. Sarah said, okay, well I am not aware of breaking the law for doing that. We have been told that we can refuse service. I am being instructed to not ring up anyone who does not have a face mask on. We asked you to leave and get a face mask and wear a face mask. I replied, you understand that I cannot wear a face mask? Sarah said, I understand that you are saying that, yes.

I replied, there is no doctor that is standing here saying that I'm either a threat to you because I don't have one, or a threat to anyone else. Sarah replied, no, there is no

doctor standing here. My store manager, my boss, Nicole, has instructed me to do this; her boss has instructed her to instruct us to do this. I don't enjoy it.

I said, listen I will give you my phone number, so if Trader Joe's wants to reach out to me, they are welcome to. Sarah said, okay, let me get something to write it down. Sarah went away to get a paper and pen and returned to take down my name and number. I said Erik offered that you guys could check out for me; how do we do that? Sarah said, let me check, I didn't hear the whole conversation.

I waited for Sarah or Erik to return.

Meanwhile, three armed Orange County Sheriff Deputies entered the store. Two of them circled around behind me... HANSEN, badge #10287 and COCO, badge #8520; they addressed me from behind. Deputy Hansen asked, what's going on sir? Confused I replied, why don't you tell me? Hansen replied, cuz you're not wearing a mask and they want you to wear one. I asked, why do they want me to wear one? Hansen explained, well it's their store and their rules and... I interjected, this is a public accommodation. Hansen replied, it's a private store. I stated, it's a public accommodation; they're selling goods, I have money. Deputy Coco interjected, well it does matter, and if they don't want you to be here, and they want to say that you're trespassing, then they have every right to have you thrown out. I asked, are you aware of a violation, is there a violation that I have committed? Deputy Coco replied, it's their store, so if they want you to leave... I repeated, you are not answering the question. Have I committed a violation? Deputy Hansen replied, this isn't a public place, so that doesn't matter; they get to set the guidelines for what happens in here, and it is the consumer's job to follow those guidelines. I replied, yes, they get to set the guidelines... based on the law. Deputy Hansen stated, whether you follow those guidelines or not is completely up to you, but they told us they don't want to serve you like this, and so obviously you are not going to be able to buy your goods, and they have made it clear that they just want you to leave.

Flabbergasted, I replied, no, they haven't made it clear that they wanted me to leave. They have made it clear that I was not able to check out, the manager took my phone number, so that the regional manager could give me a call, but nobody has asked me to

Signature of Notary

[Is]

EXHIBIT A

written communication

EXHIBIT B

2007 OSHA Letter