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LOS ANGELES
SUPERIOR COURT

Attorneys for Plaintiff

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

10 **JIM COHAN;**

11 **Plaintiff,**

12 **v.**

13 **CENTRAL AVE. PHARMACY, INC.;**
14 **CAUSEY INVESTMENTS; And DOES**
15 **1 THROUGH 10, Inclusive**

16 **Defendants.**

Case No.

EC 045610

CIVIL COMPLAINT:
DISCRIMINATORY PRACTICES IN
PUBLIC ACCOMMODATIONS
[42 U.S.C. 12182(a) ET. SEQ; CIVIL
CODE 51, 52, 54, 54.1]

17 **NAMED DEFENDANTS AND NAMED PLAINTIFF**

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20 1. Defendants are, and, at all times mentioned herein, were, a business or
21 corporation or franchise organized and existing and/or doing business under the laws of
22 the State of California.

23 2. Plaintiffs are informed and believe and thereon allege that Defendants CENTRAL
24 AVE. PHARMACY, INC.; and CAUSEY INVESTMENTS are the owners, operators,
25 and/or lessors of the real property, as well as the business operated thereon.

26 CENTRAL AVE. PHARMACY, INC.

27 MAILING ADDRESS:

1 540 N. CENTRAL AVE.

2 GLENDALE, CA 91203

3 REGISTERED AGENT: HRACH YOUSEFIAN

4 REGISTERED OFFICE:

5 540 N. CENTRAL AVE.

6 GLENDALE, CA 91203

7 PROPERTY OWNER: CAUSEY INVESTMENTS (COMPANY/CORPORATION)

8 PROPERTY ADDRESS: 540 N CENTRAL AVE, GLENDALE, CA 91203

9 COMPANY NAME: CAUSEY INVESTMENTS, A CALIFORNIA LIMITED

10 PARTNERSHIP

11 REGISTERED AGENT: JUNE H. CAUSEY

12 REGISTERED OFFICE:

13 1401 AVOCADO, #901

14 NEWPORT BEACH, CA 92660

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16 3. The words "Plaintiffs" and "Plaintiff's Member" as used herein specifically
17 include the organization and TRIPPLE AAA ASSOCIATION FOR CHILDREN AND
18 ADULTS WITH DEVELOPMENTAL DISABILITIES, SUING ON BEHALF OF ITS
19 MEMBERS, JIM COHAN; and persons associated with its Members who accompanied
20 Members to Defendants' facilities.

21 4. Defendants Does 1 through 10, were at all times relevant herein subsidiaries,
22 employers, employees, agents, of Defendants CENTRAL AVE. PHARMACY, INC.; and
23 CAUSEY INVESTMENTS. Plaintiffs are ignorant of the true names and capacities of
24 Defendants sued herein as Does 1 through 10, inclusive, and therefore sues these
25 Defendants by such fictitious names. Plaintiffs will pray leave of the court to amend this
26 complaint to allege the true names and capacities of the Does when ascertained.

27 5. Plaintiffs are informed and believe, and thereon allege, that Defendants and each
28

1 of them herein were, at all times relevant to the action, the owner, lessor, lessee,
2 franchiser, franchisee, general partner, limited partner, agent, employee, representing
3 partner, or joint venturer of the remaining Defendants and were acting within the course
4 and scope of that relationship. Plaintiffs are further informed and believe, and thereon
5 allege, that each of the Defendants herein gave consent to, ratified, and/or authorized the
6 acts alleged herein to each of the remaining Defendants.

7 CONCISE SET OF FACTS

8 6. Plaintiff's Members JIM COHAN visited the Defendants' facility. Plaintiff has
9 an impairment.

10 7. Defendants failed to provide auxiliary aids and services that are necessary to
11 ensure equal access to the goods, services, privileges, or accommodations that it offers.

12 Title 28, part 36.303 of Code of Federal Regulations states:

13 (a) General. A public accommodation shall take those steps that may be
14 necessary to ensure that no individual with a disability is excluded, denied
15 services, segregated or otherwise treated differently than other individuals
16 because of the absence of auxiliary aids and services, unless the public
17 accommodation can demonstrate that taking those steps would
18 fundamentally alter the nature of the goods, services, facilities, privileges,
19 advantages, or accommodations being offered or would result in an undue
20 burden, i.e., significant difficulty or expense.

21 (b) Examples. The term "auxiliary aids and services" includes:

22 (1) Qualified interpreters, notetakers, computer-aided transcription
23 services, written materials, telephone handset amplifiers, assistive
24 listening devices, assistive listening systems, telephones compatible with
25 hearing aids, closed caption decoders, open and closed captioning,
26 telecommunications devices for deaf persons (TDD's), videotext displays,
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