

IN THE CIRCUIT COURT OF THE
15th JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY,
FLORIDA

CASE NO.:

PATRICIA A. CONRAD,

Plaintiff,

v.

HAIR BAR NYC DELRAY BEACH INC, a
Florida corporation; HAIR BAR NYC
PARKLAND INC, a Florida corporation;
BENYS UNISEX SALON, INC. d/b/a HAIR
BAR NYC and HAIR BAR NYC
PROFESSIONAL, a Florida corporation;
HAIR BAR NYC FRANCHISE CORP, a
Florida corporation; BENY MOLAYEV
LLC, a Florida limited liability company; and
BENY MOLAYEV, individually,

Defendants.

COMPLAINT

Plaintiff Patricia A. Conrad (hereafter referred to as “Ms. Conrad” or “Plaintiff”), serves this Complaint against and sues Hair Bar NYC Delray Beach Inc, a Florida corporation; Hair Bar NYC Parkland Inc, a Florida corporation; Benys Unisex Salon Inc. d/b/a Hair Bar NYC and Hair Bar NYC Professional, a Florida corporation; Hair Bar NYC Franchise Corp, a Florida corporation; Beny Molayev LLC, a Florida corporation (hereafter referred to as “Hair Bar NYC” or “Corporate Defendants”), and Beny Molayev, individually, and states as follows:

JURISDICTIONAL ALLEGATIONS

1. This is an action for monetary damages in excess of \$50,000.00, exclusive of attorney fees and costs.

2. Plaintiff Patricia A. Conrad is *sui juris* and was employed by Corporate Defendants in Palm Beach County, Florida, and is a resident of Palm Beach County, Florida.

3. Defendant Hair Bar NYC Delray Beach Inc has been and is a Florida corporation authorized to and conducting business in Palm Beach County, Florida, and is subject to the personal jurisdiction and venue of this Court.

4. Defendant Hair Bar NYC Parkland Inc has been and is a Florida corporation authorized to and conducting business in Palm Beach County and Broward County, Florida, and is subject to the personal jurisdiction and venue of this Court.

5. Defendant Benys Unisex Salon Inc. d/b/a Hair Bar NYC and Hair Bar NYC Professional has been and is a Florida corporation authorized to and conducting business in Palm Beach County, Florida, and is subject to the personal jurisdiction and venue of this Court.

6. Defendant Hair Bar NYC Franchise Corp has been and is a Florida corporation authorized to and conducting business in Pam Beach County, Florida, and is subject to the personal jurisdiction and venue of this Court.

7. Defendant Beny Molayev LLC has been and is a Florida limited liability company authorized to and conducting business in Palm Beach County, Florida, and is subject to the personal jurisdiction and venue of this Court.

8. Defendant Beny Molayev is *sui juris* and was/is employed by Corporate Defendants in Palm Beach County, Florida and resides in Palm Beach County, Florida.

9. Various material transactions and occurrences on which this action is based took place in Palm Beach County, Florida.

10. Corporate Defendants were/are a joint/single employer of Plaintiff and/or successor corporations of any of Plaintiff's prior employers and/or any prior corporations were merged into Corporate Defendants.

11. This Court has jurisdiction and venue over all causes of action including pursuant to §48.193; 47.011; 47.021; 47.041; 47.051; and/or 760.11, Fla. Stat.

GENERAL ALLEGATIONS COMMON TO ALL COUNTS

12. All conditions precedent to this action have been performed or waived.

13. Plaintiff's damages include, but are not limited to, lost income, lost benefits and/or diminished income potential, pain and suffering, mental anguish and psychological and emotional distress.

14. Plaintiff, who is female and over the age of 40, began working as an employee for Corporate Defendants in or around 2020, as a hair stylist/operations manager in Delray Beach, Florida.

15. Corporate Defendants were joint/single employers of Plaintiff.

16. Corporate Defendants participated/participate actively in the day-to-day management of employees and developed, implemented, authorized, supervised and/or were/are otherwise responsible for employment policies and procedures as relates to Plaintiff.

17. Corporate Defendants retained ultimate authority with regard to Plaintiff's employment and retained the right to hire, fire and assign work and employee benefits of Plaintiff.

18. Corporate Defendants effectively exercised control over all important aspects of employment with regard to Plaintiff's employment.

19. Corporate Defendants shared responsibilities as to employee and employment matters.

20. Corporate Defendants had direct knowledge of and participated in the improper conduct alleged in this Complaint.

21. Corporate Defendants shared and co-determined matters governing the essential terms and conditions of Plaintiff's and other employees' employment.

22. Corporate Defendants recruited and/or hired employees, and/or approved personnel decisions.

23. Corporate Defendants retained sufficient control over employees so as to be joint and/or single employers.

24. Corporate Defendants each delegated sufficient control of traditional rights over employees of each other so that each was/is the agent of the other.

25. Plaintiff was subjected to a relentless campaign of physical and verbal abuse and/or harassment by male employee(s) of Corporate Defendants, including—but not limited to—Defendant Molayev.

26. The tortious harassment was directed at Plaintiff by Corporate Defendants' male employee(s)/manager(s), including—but not limited to—Defendant Molayev.

27. Corporate Defendants were on notice and/or knew or should have known that its employee(s) were harassing Ms. Conrad.

28. Corporate Defendants had direct knowledge of and/or participated in the improper conduct alleged in this Complaint.

29. During Plaintiff's employment with Corporate Defendants and on the premises of Corporate Defendants, Plaintiff was subjected to various improper acts of constant verbal, emotional and/or physical abuse/harassment directed towards her because she is female and/or over the age of 40.

30. On a regular and continual basis up and through the last date of Plaintiff's employment with Corporate Defendants, Corporate Defendants' male employee(s)/manager(s)/supervisor(s)—including but not limited to Defendant Molayev—perpetrated the following type of language/conduct directed towards, or in the presence of, Ms. Conrad on a frequent, mostly daily basis:

1. **Male owner repeatedly made sexual comments in Ms. Conrad's presence;**
2. **Male owner would use the term "boobs;"**
3. **Male owner would use the term "tits;"**

4. Male owner would use the term “blow job;”
5. Male owner would ask, “Are you on your period?”;
6. Male owner would touch himself inappropriately;
7. Male owner would put his hands down his pants;
8. Male owner had his visibly erect penis out while in Ms. Conrad’s presence;
9. Male owner would call Ms. Conrad, “Miss Patty;”
10. Male owner would come up behind a male employee and simulate sex;
11. Male owner would touch his private parts;
12. Male owner would act like he was having sex;
13. Male owner gave a male employee a wedgie;
14. On a regular basis, male owner would touch Ms. Conrad’s body;
15. Male owner would put his hand on Ms. Conrad leg;
16. Male owner would hug Ms. Conrad;
17. Male owner hugged Ms. Conrad from behind so that his crotch came in contact with her butt;
18. Male owner’s arms came in contact with Ms. Conrad’s chest;
19. Male owner’s chest came in contact with Ms. Conrad’s chest;
20. Male owner tried to get Ms. Conrad to give him a blow job;
21. Male owner would brush against Ms. Conrad;
22. Male owner grabbed Ms. Conrad’s breasts;
23. Male owner sent Ms. Conrad a message saying that he loved her;
24. Male owner would make sexual advances toward Ms. Conrad;

25. **Male owner would call Ms. Conrad “Monica” in reference to Monica Lewinsky;**
26. **Male owner would tell Ms. Conrad to get under the desk, implying that he wanted a blow job;**
27. **Male owner would massage Ms. Conrad’s shoulders;**
28. **Male owner would yell at Ms. Conrad and then attempt to console her by hugging her, rubbing her neck, or trying to kiss her;**
29. **On several occasions, male owner tried to rub Ms. Conrad’s breasts;**
30. **Male owner would treat Ms. Conrad as if she were his wife;**
31. **Male owner would hug Ms. Conrad, tell her that he loved her, and try to touch/rub her body;**
32. **Male owner would refer to a female employee as his work wife;**
33. **Male owner would tell female employee how hot she was;**
34. **Male owner would tell female employee how pretty she was;**
35. **Male owner would talk about female employee’s sexuality;**
36. **On a regular basis, male owner would make references to blow jobs;**
37. **Male owner would stick his tongue in the side of his cheek to simulate a blow job;**
38. **Male owner asked Ms. Conrad to get in his back seat to help with something. He then pulled his penis out and pushed Ms. Conrad’s head towards his penis;**
39. **Male owner would refer to female email employee(s) as a bitch;**
40. **Male owner would say, “this bitch is trying to sue me;”**
41. **On numerous occasions, male owner made references to oral sex;**

42. Male owner told Ms. Conrad to “come over here” as he gestured toward his penis while touching himself;
43. Male owner would make Monica Lewinsky jokes about Ms. Conrad getting under his desk;
44. Male owner would make inappropriate sexual gestures with his tongue;
45. Male owner implied that Ms. Conrad was a lesbian because she was single;
46. Male owner would sexual innuendos such as, “while you’re down there;”
47. On numerous occasions, male owner told Ms. Conrad, “get down on your knees;”
48. Male owner would tell Ms. Conrad, “you need to get laid;”
49. Male owner would tell Ms. Conrad, “you need sex;”
50. Male owner would tell Ms. Conrad that she was the way she was because she hasn’t had sex;
51. Male owner would view women in a sexual way and say, “I’d like to have her;”
52. Male owner would reference having sex and/or making love;
53. On numerous occasions, male owner told Ms. Conrad, “See how much you turn me on” (while touching himself in up and down motions);
54. Male owner reached inside Ms. Conrad’s shirt and caressed her breasts;
55. Male owner would touch/graze Ms. Conrad’s breasts;
56. Male owner would ask if Ms. Conrad had fun last night, meaning if she had sex;
57. Male owner would say, “you’re sexy;”

58. Male owner would ask Ms. Conrad, "Why are you looking for sexy today? Who is that for?";
59. Male owner would make sexually inappropriate comments about women's body parts and clothing;
60. Male owner made a sexual innuendo about the size of his shoes;
61. Male owner and male employee looked at a picture of a female employee in skimpy clothing;
62. On numerous occasions, male owner commented that Ms. Conrad needed a man;
63. Male owner would talk about his personal sex life with his wife;
64. Male owner showed/told Ms. Conrad about sexual text messages that his wife had sent him;
65. Male owner would make sexual jokes;
66. Male owner would call Ms. Conrad "Monica" and emphasize the "o" (to sound like Moan-ica);
67. Male owner made sexual thrusting motions behind male employee;
68. Male owner unzipped his pants;
69. Male owner exposed his penis;
70. Male owner pulled out his penis behind his desk;
71. Male owner would touch himself outside of his pants;
72. Male owner asked Ms. Conrad how much she would charge for a blow job;
73. Male owner told Ms. Conrad that his wife could not have sex on her period, so he had to wait;
74. On numerous occasions, male owner said "come over here and sit on my lap;"

75. On several occasions, male owner told Ms. Conrad when he thought that she looked hot;
76. Male owner would say, "Who does this bitch think she is?";
77. Male owner would say, "She's a fucking bitch;"
78. Male owner would say, "You are hot;"
79. Male owner would tell Ms. Conrad; "Wanna feel? I'm hard;"
80. Male owner would hold his hand below his waist, moving it up and down to simulate masturbation;
81. On numerous occasions, male owner rubbed against Ms. Conrad's body;
82. Male owner would place his hands on Ms. Conrad's neck and shoulder, offering to give her a massage;
83. Male owner would lean over Ms. Conrad and look down her shirt;
84. Male owner pulled down his pants in Ms. Conrad's presence;
85. Male owner would tell Ms. Conrad that he was not happy with his wife;
86. Male owner would say that he did not love his wife;
87. Male owner would say that he has never been in love;
88. Male owner implied that Ms. Conrad should get on a stripper pole;
89. Male owner commented on numerous women who he considered to be "hotties;"
90. Male owner would say, "She is hot;"
91. Male owner tried to kiss Ms. Conrad on a bench;
92. Male owner leaned over to kiss Ms. Conrad while they were talking;

93. Male owner would tell Ms. Conrad, "If you complain about sexual harassment, you're going to be terminated;"
94. Throughout Ms. Conrad's employment, male owner would sexualize her;
95. Male owner would stare at parts of Ms. Conrad's body;
96. Male owner would tell Ms. Conrad that she was so beautiful;
97. Male owner would tell Ms. Conrad "I love you;"
98. Male owner would say, "sexy outfit;"
99. Male owner would tell Ms. Conrad, "You look sexy;"
100. Male owner would tell Ms. Conrad, "I'm so horny;"
101. Male owner would say, "sexy woman;"
102. Male owner would make gestures with his hands as if to squeeze breasts;
103. Male owner would physically touch Ms. Conrad including hugging, caressing, grinding, rubbing, groping, kissing, and brushing past;
104. Male owner would stand close to Ms. Conrad, knee to knee and shoulder to shoulder;
105. On numerous occasions, male owner touched Ms. Conrad's leg(s);
106. Male owner would put Ms. Conrad's leg on his;
107. Male owner made comments about lipstick color;
108. Male owner comments about vibrators;
109. Male owner joked that Ms. Conrad used a sex toy;
110. Male owner used the term "cock sucker;"
111. On numerous occasions, male owner called Ms. Conrad "hot" or "hottie;"

112. Male owner referred to female client(s) as a bitch;
113. Male owner referred to Ms. Conrad as a MILF;
114. Male owner made jerking off movements, including under his desk;
115. Male owner would tell Ms. Conrad that he needed someone like her in his life and that he loved her;
116. Male owner would tell Ms. Conrad when his wife was in the mood to have sex;
117. Male owner would tell Ms. Conrad when his wife would send him sexually enticing messages;
118. Male owner implied that he wished that he was married to Ms. Conrad instead of his wife;
119. Male owner told Ms. Conrad that he wished he met her years ago;
120. Male owner would make sexual innuendoes such as, “you know you like it;”
121. Male owner would refer to female employees and make comments about their legs, ass, tits/boobs;
122. Male owner would say, “get under the desk;”
123. Male owner would use the term “dumb bitch;”
124. Male owner would say “She’s a lazy bitch;”
125. Male owner would ask Ms. Conrad, “Can I have a hug?”;
126. Male owner would ask Ms. Conrad, “Can I have a kiss?”;
127. Male owner would say that he needed a girl on the side;
128. On numerous occasions, male owner would look for women that he could have on the side;

129. Male owner wanted Ms. Conrad to find a woman for him that he could have on the side;
130. Male owner wanted Ms. Conrad to hire a woman for him that he could have on the side;
131. Male owner replied, “You pregnant [?]” when Ms. Conrad sent him a picture of her positive COVID test;
132. Male owner called a female employee “insecure;”
133. Male owner asked to meet Ms. Conrad outside of work and told her that he loved her;
134. Male owner sent Ms. Conrad a message that said, “You want to meet [?] Or you shy [?]”;
135. Male owner sent Ms. Conrad a message that said, “I do miss you;”
136. Male owner sent Ms. Conrad a message that said, “Good morning let’s meet for lunch [sic] Don’t be shy;”
137. Male owner sent Ms. Conrad a message that said, “I told you we forever [sic]”;
138. Male owner showed Ms. Conrad a picture of a male model and said that he found her a new guy;
139. Male owner called a female employee pretty;
140. Male owner called female employee his “side wife;”
141. Male owner/managers(s)/supervisor(s)/employee(s) continually made inappropriate sexual comments and jokes; and,
142. Male owner/manager(s)/supervisor(s)/employee(s) continually touched Ms. Conrad.

31. On a regular and continual basis up and through the last date of Plaintiff’s employment with Corporate Defendants, Corporate Defendants’ male employee(s)/manager(s)/supervisor(s)—including but not limited to Defendant

Molayev—perpetrated the following type of language/conduct directed towards, or in the presence of, Ms. Conrad on a frequent, mostly daily basis:

32. The above is a mere summary of some of the more prevalent offensive, improper and degrading conduct Plaintiff was subjected to while employed by Corporate Defendants.

33. Plaintiff complained to management about the sexual harassment numerous times but Corporate Defendants' management did nothing.

34. Ms. Conrad was terminated for pretextual reasons on or about August 4, 2024, in retaliation for her complaints about and failure to accede to the harassment/tortious conduct.

35. Much of the above-described behavior was done in the presence of other managers, supervisors, officers, employees, associates and/or other third parties, further degrading Plaintiff.

36. Corporate Defendants' employees/agents, including managers were advised of/aware of their male employee(s)' propensity to engage in tortious conduct.

37. Corporate Defendants, through their agents, officers, and owners, at all material times had actual or constructive knowledge of the improper language, conduct, transactions, and occurrences by male employee(s) but took no remedial action or inadequate remedial action.

38. The improper actions of the male employee(s) would not have been possible were it not for the authority vested in them by Corporate Defendants and/or such authority facilitated the improper conduct.

39. The male employees/associates were employees/agents of Corporate Defendants and all actions were taken by them at Corporate Defendants' place of business during normal working hours and were within the course and scope of or incident to their employment, and were done to further a purpose or interest of Corporate Defendants, and they were assisted in accomplishing their tortious conduct by the existence of the employer/employee or agency relation.

40. Corporate Defendants, through its officers/managers/supervisors/agents, had actual or constructive knowledge or notice of the actions described herein but Corporate Defendants did not take remedial action and ratified and approved those actions by permitting them to continue and by facilitating the continuation of those actions.

41. Corporate Defendants' high ranking management level and/or policy-making employees had actual knowledge of and/or participated in the tortious discriminatory conduct directed against Plaintiff.

42. Corporate Defendants' employees who terminated Plaintiff had the stature and authority to exercise control, discretion, and independent judgment over the hiring and firing of employees including Plaintiff.

43. As managing agents of Corporate Defendants, their actions, impute direct liability for/to Corporate Defendants.

44. Plaintiff rejected and complained about the above-described conduct.

45. Plaintiff found the above-described conduct totally unwelcome and offensive.

46. The above-described conduct occurred at Corporate Defendants' workplace or while conducting Defendant's business.

47. Plaintiff reported the male employee(s)' behavior to officers/managers/supervisors of Corporate Defendants.

48. Plaintiff was an excellent employee who performed her job above Corporate Defendants' and industry standards.

49. Plaintiff suffered damages as a direct and proximate result of the conduct alleged in this Complaint.

COUNT ONE
CONRAD v. CORPORATE DEFENDANTS
INTENTIONAL OR RECKLESS INFLICTION OF EMOTIONAL DISTRESS

50. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

51. This is an action for intentional or reckless infliction of emotional distress by Corporate Defendants.

52. Corporate Defendants acted recklessly or intentionally.

53. Corporate Defendants' conduct was extreme and outrageous.

54. Corporate Defendants' conduct caused Plaintiff emotional distress.

55. Plaintiff's emotional distress was severe.

56. Said conduct toward Plaintiff was deliberate, wanton, willful, intentional and reckless and was so outrageous as to go beyond all bounds of decency and to be atrocious and utterly intolerable in a civilized community.

57. Corporate Defendants knew, or should have known, that the outrageous conduct was likely to cause Plaintiff severe emotional distress.

58. As a direct and legal consequence of said intentional or reckless infliction of emotional distress by Corporate Defendants upon Plaintiff, Plaintiff suffered and continues to suffer severe psychological damage and emotional distress that has required Plaintiff in the past, and will continue to require Plaintiff in the future, to undergo medical and psychological treatment.

59. Plaintiff has lost wages in the past and will continue to suffer future lost earnings and earning capacity. Her injuries and damages are permanent and continuing in nature and she will suffer these injuries in the future.

WHEREFORE, Plaintiff seeks her remedies and damages, including damages resulting from her lost earnings/wages and earning potential, loss of earning capacity, front and back pay, compensatory damages, pain and suffering, mental anguish, inconvenience, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills and expenses, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff demands trial by jury.

COUNT TWO
CONRAD v. CORPORATE DEFENDANTS
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

60. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

61. This is an action against Corporate Defendants for negligent infliction of emotional distress.

62. Corporate Defendants owed Plaintiff a duty to ensure that the workplace was free from tortious conduct.

63. Corporate Defendants breached that duty by failing to do so.

64. Corporate Defendants negligently failed to protect Plaintiff from tortious conduct that could reasonably be expected to result in severe emotional distress.

65. As a direct, proximate, and foreseeable result of Corporate Defendants' failure to exercise due care, including failure to exercise due care to prevent physical impacts against Plaintiff, such impacts occurred and caused Plaintiff to suffer severe emotional distress, with physical manifestations.

66. As a direct and legal consequence of Corporate Defendants' failure to exercise due care, Plaintiff has suffered and continues to suffer severe emotional or psychological damage that has required her in the past and will continue to require her in the future to undergo medical and/or psychological treatment.

67. Plaintiff has lost wages in the past and will continue to suffer future lost earnings and earning capacity. Her injuries and damages are permanent and continuing in nature and she will suffer these injuries in the future.

WHEREFORE, Plaintiff seeks her remedies and damages, including damages resulting from her lost earnings/wages and earning potential, loss of earning capacity, front and back pay, compensatory damages, pain and suffering, mental anguish, inconvenience, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills and expenses, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff demands trial by jury.

COUNT THREE
CONRAD v. CORPORATE DEFENDANTS
COMMON LAW BATTERIES

68. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

69. This is an action against Corporate Defendants for common law batteries committed against Plaintiff.

70. As set forth above, male employee(s) intentionally touched Plaintiff's body on numerous occasions.

71. Plaintiff found the touching of her body to be highly offensive.

72. As a result of the numerous batteries by Corporate Defendants' male employee(s), Plaintiff has suffered damages within the jurisdiction of this Court, including but not limited to the loss of earnings and earning potential and serious psychological and emotional distress requiring ongoing medical or psychological treatment.

WHEREFORE, Plaintiff seeks her remedies and damages, including damages resulting from her lost earnings/wages and earning potential, loss of earning capacity, front and back pay, compensatory damages, pain and suffering, mental anguish, inconvenience, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills and expenses, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff demands trial by jury.

COUNT FOUR
CONRAD v. CORPORATE DEFENDANTS
CIVIL ASSAULTS

73. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

74. This is an action against Corporate Defendants for assault.

75. Male employee(s) intentionally sought to touch Plaintiff's body without her consent on numerous occasions.

76. Said employee(s)' attempts to touch Plaintiff's body created in Plaintiff a well-founded fear of imminent and offensive physical contact because of their present ability to effectuate the attempts if they were not prevented from doing so.

77. Plaintiff found the touching or the attempted touching of her body to be highly offensive, and the employee(s)' continued attempts to touch her placed her in reasonable fear of imminent peril.

78. The numerous occasions on which the male employee(s) actually touched Plaintiff demonstrated to Plaintiff their willingness to carry out their threats of further physical contacts.

79. As a result of the numerous assaults by employee(s), Plaintiff has suffered damages within the jurisdiction of this Court, including but not limited to the loss of earnings and earning potential, serious psychological and emotional distress requiring ongoing medical or psychological treatment.

WHEREFORE, Plaintiff seeks her remedies and damages, including damages resulting from her lost earnings/wages and earning potential, loss of earning capacity,

front and back pay, compensatory damages, pain and suffering, mental anguish, inconvenience, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills and expenses, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff demands trial by jury.

COUNT FIVE
CONRAD v. CORPORATE DEFENDANTS
NEGLIGENT SUPERVISION

80. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

81. This is an action against Corporate Defendants for negligent supervision of its employees/agents.

82. While Plaintiff was employed by Corporate Defendants, Corporate Defendants owed Plaintiff a duty to ensure that the workplace was free from tortious conduct.

83. Corporate Defendants breached that duty.

84. Especially after receiving actual or constructive notice of the improper conduct of its agent(s) and employee(s), Corporate Defendants had a duty to inquire into the work environment, to supervise agents and employees of Corporate Defendants, and to investigate and discipline any employee if such employee failed to adhere to appropriate and legal conduct in the workplace.

85. Corporate Defendants breached that duty.

86. Corporate Defendants negligently failed to supervise their managers and male employee(s) or to take appropriate remedial action after Corporate Defendants

knew, or should have known, of the continuing tortious conduct directed toward Plaintiff. The tortious conduct included batteries, assaults and intentional infliction of emotional distress.

87. During the course of employment Corporate Defendants was aware or should have been aware of the problems with, and unfitness of, their male employee(s) but failed to take further action such as investigation, discharge or reassignment.

88. If Corporate Defendants had exercised reasonable care to protect Plaintiff from the continued tortious conduct, Plaintiff would not have suffered injuries.

89. Such torts caused Plaintiff to suffer severe emotional distress.

90. Plaintiff suffered physical injuries/manifestations due to the physical impacts directed against her by agents of Corporate Defendants. Such impacts caused Plaintiff to suffer severe emotional distress with physical manifestations. Plaintiff also suffered from physical injuries/manifestations caused by the psychological trauma.

91. As a direct and legal consequence of Corporate Defendants' failure to exercise due care in supervising and disciplining their male employee(s), Plaintiff has suffered and continues to suffer severe psychological and emotional damage that has required medical and psychological treatment and which will continue to require such treatments in the future.

92. As a direct and legal consequence of Corporate Defendants' failure to exercise due care, Plaintiff has lost wages in the past, and will continue to suffer lost earnings and earning capacity in the future. These injuries and damages are substantial and continuing in nature and Plaintiff will continue to suffer these injuries in the future.

93. The conduct of male employee(s), as set forth above, was thereby ratified by Corporate Defendants, demonstrated deliberate malicious, wanton conduct and reckless indifference by Corporate Defendants as to the well-being of Plaintiff and other similarly situated employees and, thus, constituted extreme and outrageous conduct.

WHEREFORE, Plaintiff seeks her remedies and damages, including damages resulting from her lost earnings/wages and earning potential, loss of earning capacity, front and back pay, compensatory damages, pain and suffering, mental anguish, inconvenience, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills and expenses, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff demands trial by jury.

COUNT SIX
CONRAD v. CORPORATE DEFENDANTS
NEGLIGENT RETENTION

94. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

95. This is an action against Corporate Defendants for negligent retention of their male employees.

96. Corporate Defendants owed Plaintiff a duty to ensure that the workplace was free from tortious conduct.

97. Corporate Defendants breached that duty.

98. Especially after receiving actual or constructive notice of the male employee(s) conduct, Corporate Defendants had a duty to inquire into the work

environment and to terminate any employees if they failed to adhere to appropriate and legal conduct in the workplace.

99. Corporate Defendants breached that duty by failing to do so.

100. Corporate Defendants negligently failed to terminate male employee(s) even after receiving actual or constructive knowledge of the tortious conduct toward Plaintiff and/or other female employees. The tortious conduct included assaults, batteries, and intentional infliction of emotional distress.

101. If Corporate Defendants had terminated the male employee(s), Plaintiff would not have suffered injuries or Plaintiff's injuries would have been less severe.

102. Such torts caused Plaintiff to suffer severe emotional distress.

103. Plaintiff suffered physical injuries/manifestations due to the physical impacts directed against her by agents of Corporate Defendants. Such impacts caused Plaintiff to suffer emotional distress with physical manifestations. Plaintiff also suffered from physical injuries/ manifestations caused by the psychological trauma.

104. As a direct and legal consequence of Corporate Defendants' failure to exercise due care by failing to terminate their employees/agents, Plaintiff has suffered and continues to suffer psychological and emotional damage that has required medical and psychological treatment and which will continue to require such treatments in the future.

105. As a direct and legal consequence of Corporate Defendants' failure to terminate, Plaintiff has lost wages in the past, and will continue to suffer lost earnings

and earning capacity in the future. These injuries and damages are substantial and continuing in nature and Plaintiff will continue to suffer these injuries in the future.

WHEREFORE, Plaintiff seeks her remedies and damages, including damages resulting from her lost earnings/wages and earning potential, loss of earning capacity, front and back pay, compensatory damages, pain and suffering, mental anguish, inconvenience, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills and expenses, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff demands trial by jury.

COUNT SEVEN
CONRAD v. CORPORATE DEFENDANTS
VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT OF 1992,
SECTIONS 760.01-760.11, FLA.STAT.
SEXUAL/AGE HARASSMENT/DISCRIMINATION

106. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

107. Plaintiff, as a female employee over the age of 40, belonged to a protected group within Section 760.10, Fla. Stat.

108. Corporate Defendants were/are employers under Section 760.02, Fla. Stat., employing 15 or more employees for each working day during Plaintiff's employment.

109. During the course of her employment with Corporate Defendants, Plaintiff was repeatedly subjected to a sexually and/or age-based hostile work environment and to unwelcome sexual/age harassment/discrimination by Corporate Defendants, and by employees and agents of Corporate Defendants, and by employees and agents of

Corporate Defendants, who frequently committed offensive verbal acts or conduct toward Plaintiff, which Plaintiff at all times found offensive and to which Plaintiff repeatedly objected.

110. The harassment/discrimination suffered by Plaintiff was based on Plaintiff's sex and/or age, and Plaintiff at all times rejected all sexual overtures and objected to all offensive language and conduct.

111. The aforementioned harassment/discrimination based on Plaintiff's sex/age was so pervasive that it affected a term, condition, or privilege of employment and created a hostile and abusive working environment for Plaintiff.

112. Corporate Defendants knew, or in the exercise of reasonable care should have known, of the aforementioned sexual/age harassment/discrimination, but failed to take prompt and effective remedial action.

113. The male employee(s) committing sexual harassment/discrimination toward Plaintiff were employees, agents, or servants of Corporate Defendants.

114. Plaintiff filed a timely complaint with the Florida Commission on Human Relations, and 180 days have passed since the filing of her charge without any findings. A true and correct copy of FCHR charge is attached hereto as Plaintiff's Exhibit "A."

115. Plaintiff has retained legal counsel to represent her in this lawsuit and has agreed to pay a reasonable fee.

116. Plaintiff is entitled to attorney fees and costs pursuant to Section 760.11, Fla. Stat.

117. The actions of Corporate Defendants were so wanton, willful and reckless in such total disregard of the rights of Plaintiff as to require the imposition of punitive/exemplary damages so as to punish Corporate Defendants for those actions and to deter Corporate Defendants and others from similar actions in the future.

WHEREFORE, Plaintiff seeks her remedies under Chapter 760, Fla. Stat., The Florida Civil Rights Act of 1992, as amended, including Sections 760.10 and 760.11, Fla. Stat., including, but not limited to: an order prohibiting the discriminatory practices of Corporate Defendants and providing affirmative relief from the effects of the practices, including back pay; compensatory damages, including but not limited to, damages for mental anguish, loss of dignity, and any other intangible injuries; damages resulting from lost earnings/wages and earning potential; back and front pay; lost benefits; pain and suffering; loss of capacity for the enjoyment of life; psychological and emotional injuries; medical and psychological bills; punitive damages; costs; prejudgment interest; reasonable attorney fees and costs pursuant to Section 760.11(5), Fla. Stat; and, all other relief that the Court deems appropriate. Plaintiff demands a trial by jury.

COUNT EIGHT
CONRAD v. CORPORATE DEFENDANTS
VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT OF 1992,
SECTIONS 760.01-760.11, FLA.STAT.
RETALIATION

118. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

119. Plaintiff, as a female employee over the age of 40, belonged to a protected group within Section 760.10, Fla. Stat.

120. Corporate Defendants was/in an employer under Section 760.02, Fla. Stat., employing 15 or more employees for each working day Plaintiff's employment.

121. Plaintiff engaged in statutorily protected expression.

122. Plaintiff suffered an adverse employment action(s).

123. There was a causal connection between Plaintiff's participation in protected expression and the adverse action.

124. As a direct, legal, and/or proximate cause of the above alleged violations, Plaintiff has suffered damages.

125. Corporate Defendants retaliated against Plaintiff because Plaintiff

126. challenged, opposed and complained of the unlawful practices of Corporate Defendants alleged in this Complaint.

127. Plaintiff was retaliated against and discharged from her employment by Corporate Defendants for pretextual reasons and in retaliation for her complaints regarding the sexually/age-based hostile work environment and retaliation, and in retaliation for her refusal to accede to the above-described conduct.

128. Plaintiff filed a timely complaint with the Florida Commission on Human Relations, and 180 days have passed since the filing of her charge. A true and correct copy of FCHR documents is attached hereto as Plaintiff's Exhibit "A."

129. Plaintiff has retained legal counsel to represent her in this lawsuit and has agreed to pay a reasonable fee.

130. Plaintiff is entitled to attorney fees and costs pursuant to Section 760.11, Fla. Stat.

131. The actions of Corporate Defendants were so wanton, willful and reckless in such total disregard of the rights of Plaintiff as to require the imposition of punitive/exemplary damages so as to punish Corporate Defendants for those actions and to deter Corporate Defendants and others from similar actions in the future.

WHEREFORE, Plaintiff seeks her remedies under Chapter 760, Fla. Stat., The Florida Civil Rights Act of 1992, as amended, including Sections 760.10 and 760.11, Fla. Stat., including, but not limited to: an order prohibiting the discriminatory practices of Corporate Defendants and providing affirmative relief from the effects of the practices, including back pay; compensatory damages, including but not limited to, damages for mental anguish, loss of dignity, and any other intangible injuries; damages resulting from lost earnings/wages and earning potential; back and front pay; lost benefits; pain and suffering; loss of capacity for the enjoyment of life; psychological and emotional injuries; medical and psychological bills; punitive damages; costs; prejudgment interest; reasonable attorney fees and costs pursuant to Section 760.11(5), Fla. Stat; and, all other relief that the Court deems appropriate. Plaintiff demands a trial by jury.

COUNT NINE
CONRAD v. DEFENDANT MOLAYEV
INTENTIONAL OR RECKLESS INFLICTION OF EMOTIONAL DISTRESS

132. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

133. This is an action for intentional or reckless infliction of emotional distress against Defendant Molayev by Ms. Conrad.

134. On numerous occasions Defendant Molayev physically touched Ms. Conrad and made numerous offenses, vulgar sexual comments to or about Ms. Conrad.

135. At all material times, the above conduct toward Ms. Conrad was deliberate, wanton, willful, intentional and reckless and was so outrageous as to go beyond all bounds of decency and to be atrocious and utterly intolerable in a civilized community.

136. At all material times, Defendant Molayev knew, or should have known, that his outrageous conduct was likely to cause Ms. Conrad emotional distress.

137. As a direct and legal consequence of said intentional or reckless infliction of emotional distress by Defendant Molayev upon Ms. Conrad, Ms. Conrad has suffered and continues to suffer psychological damage and emotional distress that has required her in the past, and will continue to require her in the future, to undergo medical and psychological treatment.

138. Ms. Conrad has lost wages in the past and will continue to suffer future lost earnings and earning capacity. Her injuries and damages are permanent and continuing in nature and she will suffer these injuries in the future.

WHEREFORE, this Court should award Ms. Conrad her damages, including compensatory damages, damages resulting from her lost earnings/wages and earning potential, back and front pay, pain and suffering, mental anguish, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills,

costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff further demands trial by jury of all issues triable as of right.

COUNT TEN
CONRAD v. DEFENDANT MOLAYEV
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

139. Plaintiff realleges paragraphs 1 through 49, as if fully set forth herein.

140. This is an action against Defendant Molayev for negligent infliction of emotional distress.

141. On numerous occasions Defendant Molayev physically touched Ms.

142. Conrad and made numerous offensive, vulgar sexual comments to or about Ms. Conrad.

143. At all material times, Defendant Molayev owed Plaintiff a duty to ensure that the workplace was free from tortious conduct.

144. Defendant Molayev breached that duty by failing to do so.

145. Defendant Molayev negligently failed to protect Plaintiff from tortious conduct that could reasonably be expected to result in severe emotional distress.

146. As a direct, proximate, and foreseeable result of Defendant Molayev's failure to exercise due care, including failure to exercise due care to prevent physical impacts against Plaintiff, such impacts occurred and caused Plaintiff to suffer severe emotional distress, with physical manifestations.

147. As a direct and legal consequence of Defendant Molayev's failure to exercise due care, Plaintiff has suffered and continues to suffer severe emotional or

psychological damage that has required her in the past and will continue to require her in the future to undergo medical and/or psychological treatment.

148. Plaintiff has lost wages in the past and will continue to suffer future lost earnings and earning capacity. Her injuries and damages are permanent and continuing in nature and she will suffer these injuries in the future.

WHEREFORE, this Court should award Ms. Conrad her damages, including compensatory damages, damages resulting from her lost earnings/wages and earning potential, back and front pay, pain and suffering, mental anguish, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff further demands trial by jury of all issues triable as of right.

COUNT ELEVEN
CONRAD v. DEFENDANT MOLAYEV
COMMON LAW BATTERIES

149. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully forth herein.

150. This is an action against Defendant Molayev for common law batteries committed against Ms. Conrad.

151. On numerous occasions Defendant Molayev physically touched Ms. Conrad.

152. As set forth above, Defendant Molayev intentionally touched Plaintiff's body on numerous occasions.

153. At all times, Ms. Conrad found the touching of her body to be highly offensive.

154. As a result of the numerous batteries by Defendant Molayev, Ms. Conrad has suffered damages within the jurisdiction of this Court, including but not limited to the loss of earnings and earning potential and psychological and emotional distress requiring ongoing medical or psychological treatment.

WHEREFORE, this Court should award Ms. Conrad her damages, including compensatory damages, damages resulting from her lost earnings/wages and earning potential, back and front pay, pain and suffering, mental anguish, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff further demands trial by jury of all issues triable as of right.

COUNT TWELVE
CONRAD v. DEFENDANT MOLAYEV
CIVIL ASSAULTS

155. Plaintiff restates and realleges Paragraphs 1 through 49, as if fully set forth herein.

156. This is an action against Defendant Molayev for assault.

157. Defendant Molayev intentionally sought to touch Plaintiff's body without her consent on numerous occasions.

158. Defendant Molayev's attempts to touch Plaintiff's body created in Plaintiff a well-founded fear of imminent and offensive physical contact because of his present ability to effectuate the attempts if he were not prevented from doing so.

159. Plaintiff found the touching or the attempted touching of her body to be highly offensive, and Defendant Molayev continued attempts to touch her placed her in reasonable fear of imminent peril.

160. The numerous occasions on which Defendant Molayev actually touched Plaintiff demonstrated to Plaintiff his willingness to carry out his threats of further physical contacts.

161. As a result of the numerous assaults by Defendant Molayev, Plaintiff has suffered damages within the jurisdiction of this Court, including but not limited to the loss of earnings and earning potential, serious psychological and emotional distress requiring ongoing medical or psychological treatment.

WHEREFORE, this Court should award Ms. Conrad her damages, including compensatory damages, damages resulting from her lost earnings/wages and earning potential, back and front pay, pain and suffering, mental anguish, loss of capacity for the enjoyment of life, psychological and emotional injuries, medical and psychological bills, costs, prejudgment interest, and all other relief that the Court deems appropriate. Plaintiff further demands trial by jury of all issues triable as of right.

JURY DEMAND

Plaintiff demands trial by jury.

William M. Julien, P.A.
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BY:

/s/ Olivia Povedano

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Exhibit “A”

NOT A CERTIFIED COPY



LAW OFFICE OF
WILLIAM M. JULIEN, P.A.
Employee Justice

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May 28, 2025

Via email: miamatty@eoc.gov

Evangeline Hawthorne, Director
EEOC Miami District Office
100 SE 2nd Street, Suite 1500
Miami, FL 33131

RE: Charging Party: Patricia A. Conrad
Respondent: Hair Bar NYC, et al.

Dear Sir/Madam:

Please be advised that the undersigned represents Ms. Patricia A. Conrad. Enclosed please find a Charge of Discrimination on her behalf. Please file this with the EEOC and Florida Commission on Human Relations. Thank you for your courtesy and cooperation. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

WILLIAM M. JULIEN
WMJ/op

Enclosure
cc: Patricia Conrad

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

- FEPA
- EEOC

Florida Commission on Human Relations _____ and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

Ms. Patricia A. Conrad

Home Phone (Incl. Area Code)

Date of Birth

Street Address

City, State and ZIP Code

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two are named, list under PARTICULARS below.)

Name

Hair Bar NYC/Delray Beach/Parkland/PBG/Franchise Corp., et al.

No. Employees, Members

15+

Phone No. (Incl. Area Code)

(561) 270-6888

Street Address

City, State and ZIP Code

601 N. Congress Ave., Suite 608, Delray Beach, FL 33445

Name

Beny's Unisex Salon/Beny Molayev LLC/Hair Salon Property Management, et al.

No. Employees, Members

Phone No. (Incl. Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

- RACE
- COLOR
- SEX
- RELIGION
- NATIONAL ORIGIN
- RETALIATION
- AGE
- DISABILITY
- GENETIC INFORMATION
- OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

Aug 5, 2024

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I. STATEMENT OF PERSONAL HARM:

I was hired/worked as a hair stylist/operations manager. I was discriminated against based on and because of my sex (female) and age. I was discriminated against, harassed and retaliated against by owner(s)/officer(s)/manager(s)/supervisors(s)/employee(s). I had different terms and conditions of employment than other male employees. I am the victim of disparate impact/intent and/or treatment, and discrimination/harassment/retaliation based on being female and/or my age. I was subjected to a sexually and ageist hostile environment, including constant sexually and/or ageist offensive language/jokes/comments/slurs/actions/touchings directed at me by the male owner(s)/officer(s)/manager(s)/supervisors(s)/employee(s). After I complained I was retaliated against and terminated. I was subjected to a hostile environment based on my sex/age.

II. RESPONDENT'S REASON FOR PERSONAL HARM:

I was not given a reason.

III. DISCRIMINATION STATEMENT:

I have been discriminated against, harassed and/or retaliated against because of my sex and age in violation of the Florida Civil Rights Act of 1992, as amended, §760.01 - 760.11, Fla. Stat.; Title VII of the Civil Rights Act of 1964, as amended; and the ADEA. I believe I have been discriminated against for the following reasons, including, but not limited to: I was discriminated against and harassed/degraded by owner(s)/officer(s)/manager(s)/supervisor(s)/employee(s) based on my sex and/or age. When I complained, I was retaliated against and terminated.



WILLIAM M. JULIEN
Commission # HH 443414
Expires November 13, 2027

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State or Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

5/28/25

Patricia Conrad

Date

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

Patricia Conrad
5/28/25