

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

CASE NO.:

LEANNE MARIA MOLELLA,

Plaintiff,

v.

ONE BRAZILIAN COURT SALON LLC  
d/b/a BRAZILIAN COURT SALON, a  
foreign limited liability company; CSC  
BRAZILIAN, L.P. d/b/a BRAZILIAN  
COURT and BRAZILIAN COURT HOTEL,  
a foreign limited partnership; and,  
BRAZILIAN COURT CONDOMINIUM  
ASSOCIATION, INC., a Florida  
corporation.

Defendants.

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**COMPLAINT**

Plaintiff Leanne Maria Molella (hereafter referred to as “Ms. Molella” or “Plaintiff”), serves this Complaint against and sues Defendants One Brazilian Court Salon LLC d/b/a Brazilian Court Salon; CSC Brazilian, L.P. d/b/a Brazilian Court and Brazilian Court Hotel; and, Brazilian Court Condominium Association, Inc. (hereafter collectively referred to as “Corporate Defendant”) 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 Leanne Maria Molella is *sui juris* and was employed by Defendants in Palm Beach County, Florida, and is a resident of Palm Beach County, Florida.

3. Defendant One Brazilian Court Salon LLC d/b/a Brazilian Court Salon has been and is a Delaware 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.

4. Defendant CSC Brazilian, L.P. d/b/a Brazilian Court and Brazilian Court Hotel has been and is a Delaware limited partnership authorized to and conducting business in Palm Beach County, Florida, and is subject to the personal jurisdiction and venue of this Court.

5. Defendant Brazilian Court Condominium Association, 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.

6. 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.

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

8. 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**

9. All conditions precedent to this action have been performed or waived.
10. 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.
11. Corporate Defendants were joint/single employers of Plaintiff.
12. 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.
13. 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.
14. Corporate Defendants effectively exercised control over all important aspects of employment with regard to Plaintiff's employment.
15. Corporate Defendants shared responsibilities as to employee and employment matters.
16. Corporate Defendants had direct knowledge of and participated in the improper conduct alleged in this Complaint.
17. Corporate Defendants shared and co-determined matters governing the essential terms and conditions of Plaintiff's and other employees' employment.

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

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

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

21. Plaintiff was subjected to a relentless campaign of physical and verbal abuse and/or harassment by male employee(s) of Corporate Defendants.

22. The tortious harassment was directed at Ms. Molella by Corporate Defendants' male employee(s)/managers.

23. Corporate Defendants were on notice and/or knew or should have known that their employee(s) were harassing Ms. Molella.

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

25. 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.

26. Ms. Molella, who is female, began working for Corporate Defendants in or around February, 2019 as a receptionist and salon manager at Corporate Defendants' Palm Beach, Florida location.

27. On a regular and continual basis up and through the last date of Ms. Molella's employment with Corporate Defendants, Corporate Defendants' male employee(s)/supervisor(s) perpetrated the following type of language/conduct directed towards, or in the presence of, Ms. Molella on a frequent, mostly daily basis:

1. **Male director and male employees would regularly make derogatory comments about female employees and customers;**
2. **On numerous occasions, male director and male employees intentionally touched Ms. Molella without her permission;**
3. **Male director/employees would touch Ms. Molella's waist and butt;**
4. **Male director/employees would intentionally brush against Ms. Molella on a regular basis;**
5. **Female employees would pull up Ms. Molella's shirt, causing Ms. Molella's breasts to be exposed in front of male employees;**
6. **Male director would make comments about hiring attractive women for the front desk instead of men for that job;**
7. **Male director would make comments about not hiring/not wanting to hire anyone of color;**
8. **Male director would use the N-word;**
9. **Male employee would make comments about what Ms. Molella was wearing, including comments regarding how sexy she looked;**
10. **On a regular basis, male employees would tell Ms. Molella that she looked sexy;**
11. **On a regular basis, several male employees would make comments that they could see Ms. Molella's boobs or nipples;**
12. **On several occasions, male employee asked Ms. Molella if her nipples were pierced;**

13. On several occasions, male employee brushed up against Ms. Molella from behind (genitals to butt);
14. On a regular basis, male employee would talk about the women that he had slept with or was paying to sleep with;
15. Male employee would constantly ask Ms. Molella the size of her shoes, bra, shirts and pants;
16. Male employee would talk about going to swinger clubs;
17. Male employee would call Ms. Molella a prude or say that she was playing hard to get;
18. Male employee would show off (in person and in photos) the tattoo near his groin area;
19. Male employee would show naked photos of himself to Ms. Molella while she was alone in her office;
20. Male employee would intentionally touch Ms. Molella's lower back, arm, hands, and shoulder without her permission;
21. On a regular basis, male employee would talk about how he had erectile dysfunction and ask what treatments he should get;
22. Male employee would talk about taking Viagra;
23. Male employee would unzip his pants in front of Ms. Molella while she was alone in her office;
24. On a regular basis, male employee would say Ms. Molella's glasses, shoes, hair, nails, skirts, blouses, and/or stockings were sexy;
25. Male employee would say, "I just came a little;"
26. Two male employees would drink on shift and would be at the bar during their shifts, sometimes sitting with male owner;
27. Several employees would smoke weed on shift during business hours;

28. On a regular basis, several male employees would tell Ms. Molella that she smelled very good or that they loved the scent she was wearing and they wished their wives would wear that perfume;
29. Several male employees would stand shoulder to shoulder with Ms. Molella;
30. Male employees, including male director, would inch closer to Ms. Molella and other female employees even after Ms. Molella and the other female employees repeatedly moved away;
31. Multiple female employees expressed to Ms. Molella that male employees would be so close to them that it felt like the male employees were standing on top of them;
32. On a near daily basis, male employee would refer to his wife as a bitch and/or cunt;
33. On a regular basis, male employee would talk about his wife being on her period and/or that she was being a bitch to him;
34. Male employee would send female co-workers to ask Ms. Molella if she would go on a date with him and/or how much money it would take for her to go on a date with him;
35. Male employee would talk about how his penis was pierced and ask if he should re-pierce it;
36. Male employee would ask Ms. Molella if she was in a bad mood because she didn't have sex the night before;
37. Male employee would talk about how he was an ass or boob guy and ask male co-workers the same in front of Ms. Molella;
38. On several occasions, male employee told Ms. Molella that she had nice boobs and a nice ass;
39. Male employee would make comments that Ms. Molella probably gave good head;
40. Male employee would show pornographic videos to Ms. Molella and other co-workers;

41. On a regular basis, male employee would show naked photos of women he hooked up with and/or paid to hook up with him;
42. Male employee would ask Ms. Molella if she got laid recently or tell her that she needed to get laid;
43. On several occasions, male employee had visible erections in front of Ms. Molella;
44. When Ms. Molella would pick something up off the ground, male employee would tell her that she looked good from down there and/or not to get up too fast;
45. On a regular basis, male employees would refer to a female employee from the hotel's restaurant as a whore;
46. Male employees would say that they would never have sex with female employee because she was easy;
47. Male employee would tell Ms. Molella that she looked good in her clothes;
48. Male employee would tell Ms. Molella that she should paint her nails a certain color because he liked that color on her;
49. Male employee would ask Ms. Molella if and/or how she shaved her pubic hair;
50. On a near daily basis, male employee would tell Ms. Molella he could see her bra or underwear through her clothing;
51. Male employee would ask Ms. Molella if she had a threesome and/or would have a threesome;
52. Male employee would ask Ms. Molella what type of underwear she wore;
53. Male employee would ask Ms. Molella if she shaved or waxed;
54. On a regular basis, male employee would ask Ms. Molella if she was on her period;
55. Male employee would tell Ms. Molella that he liked landing strips on women;

- 56. Male employee would talk about how he wore cock rings and would tell Ms. Molella if he was wearing one at work;**
- 57. On a regular basis, male employee would wink at Ms. Molella;**
- 58. Male employee would catcall Ms. Molella outside on her way to her vehicle;**
- 59. On a regular basis, male employee would invite Ms. Molella out for drinks and dinner;**
- 60. On a regular basis, male employee would touch his crotch area in front of Ms. Molella;**
- 61. On a regular basis, male employee would talk about what turned him on and what fetishes he had;**
- 62. On a regular basis, male employee would take out his wallet and hold money up and say “How much?” to Ms. Molella;**
- 63. On a near daily basis, male employee would say “You know you like me;”**
- 64. Male employee would ask Ms. Molella if she had sisters and if they all had the same dad;**
- 65. Male employee would ask Ms. Molella to hook him up with one of her sisters;**
- 66. Male employee would ask to see pictures of Ms. Molella’s sisters and make comments like “You are the prettiest;”**
- 67. On several occasions, male employees would ask Ms. Molella if she spit or swallowed;**
- 68. On a regular basis, male employee would tell Ms. Molella that he had naked dreams about having sex with Ms. Molella;**
- 69. Male employee would say, “Are you cold? I can tell. Your headlights are on;”**
- 70. Male employee would talk about if women were too skinny or too fat for his liking;**
- 71. Male employee would talk about affairs and how he hated his wife and that he couldn’t leave or else she would take all of his money;**

- 72. Male employee would say that he knew what color Ms. Molella's panties were and/or he would ask her what color her panties were;**
- 73. Male employee would ask Ms. Molella if she was on birth control;**
- 74. On several occasions, male employee elbowed Ms. Molella very aggressively in her breast;**
- 75. Male employees would make blonde comments about a female co-worker;**
- 76. Several male employees would ask Ms. Molella, "Why are you so tired. Did your boyfriend wear you out last night?";**
- 77. Two male employees would compare penis sizes in front of Ms. Molella;**
- 78. Several male employees would make comments about not liking certain female employees'/customers' body types;**
- 79. All the male employees would huddle in the front of the salon when they saw an attractive young female customer come in;**
- 80. Male employees would whisper comments about young female customers such as, "I'd fuck her. She's probably young enough to be my daughter;"**
- 81. Male employees would gawk at young female customers;**
- 82. Male employees would ask Ms. Molella if she had gained or lost weight;**
- 83. On a regular basis, several male co-workers would look Ms. Molella up and down;**
- 84. On a regular basis, male employees would tell Ms. Molella that she had a beautiful figure;**
- 85. On a near daily basis, male employee would say that Ms. Molella was his type;**
- 86. On a near daily basis, male employees would look down Ms. Molella's shirt or at her butt;**
- 87. Male exposed himself (in boxers) privately in Ms. Molella's office;**

88. Male director persisted about setting Ms. Molella up on a date with his cousin and would make comments such as, "I'll pay you to marry him so he can get citizenship;"
89. Male director would touch Ms. Molella's lower back, shoulders, arm and hands;
90. On several occasions, male director tried to massage Ms. Molella's shoulders;
91. On a regular basis, male director would question if a woman was born a woman or man;
92. Male director, who is married, would show videos of himself having sex with other women and also nude photos of the women he had sex with;
93. Male director would ask female employee(s) to give him shoulder massages in front of Ms. Molella;
94. Male director would ask to see pictures of Ms. Molella's four sisters;
95. Male director would mention when his wife was out of town and ask if Ms. Molella wanted to come over;
96. Male director would talk about what bar or strip club he was going to that night when his wife was out of town;
97. Male director would ask female employee to set him up with her friends;
98. Male director would constantly refer to women whores or sluts;
99. Male director would talk about going to the strip clubs with another male co-worker;
100. Male director would go to the strip club during work hours;
101. On a regular basis, male director would tell Ms. Molella that she should always do her hair and makeup because she doesn't look pretty without it;
102. Male director would make jokes about having a mistress and ask if female employees would want to be his mistress;
103. Male director would always comment on women's weight saying, "She's huge" or "She's getting too big;"

104. Male director would lose his temper often and yell at Ms. Molella in her office;
105. Male director said Ms. Molella looked like housekeeping or the help when she wore her hair in a bun;
106. Male director would make comments about Ms. Molella eating, including “You’re eating too much,” “Eating again?” and “You should stop eating so much;”
107. On several occasions, male director told Ms. Molella, “If you don’t like working here, you can leave;”
108. Male director would tell Ms. Molella that, as the salon manager, Ms. Molella could not hire African American applicants because male director thought they were “loud and ghetto;”
109. When Ms. Molella would put through a qualified candidate who was a person of color, management would decline their application;
110. If an attractive female would apply for a position at the salon, male director would make comments about how they should hire the applicant and replace an older employee;
111. Male director paid younger women to hook up with him and showed male co-workers videos of the women that he paid to have sex with him;
112. Male director would call his wife a bitch;
113. Male director would ask if Ms. Molella sisters were as beautiful as her;
114. Male director was known to be cheating on his wife;
115. Several male employees would use the women’s single stall restroom with the door unlocked, occasionally exposing themselves;
116. Several male employees would ask Ms. Molella if she was single;
117. Several male employees would ask where Ms. Molella lived and if she lived with roommates;

- 118. On multiple occasions, female employees pulled down Ms. Molella's shirt exposing her breasts (without a bra) to male co-workers;**
- 119. Female employees would intentionally grope Ms. Molella's breast(s) in front of the male co-workers;**
- 120. Several male and female employees would ask Ms. Molella if she was working out;**
- 121. Male co-workers would tell Ms. Molella that there was something on her butt, while female co-workers would say there was nothing on her butt;**
- 122. Three male employees would say Ms. Molella's boyfriend was a very lucky man.**
- 123. Male employee would rub Ms. Molella's shoulders or hug her from behind;**
- 124. Male director and three other co-workers would say nigger in a derogatory way and constantly make statements like, "She looks like a monkey," "Turn the lights on I can't see you," "Smile when the lights are off;"**
- 125. Female employees would smack Ms. Molella's butt in the presence of customers and male co-workers, as well as privately in Ms. Molella's office;**
- 126. On a regular basis, male employee would show photos of naked guys and their penis sizes;**
- 127. On a regular basis, male employee would show Ms. Molella what guys he was hooking up with;**
- 128. Male employee would talk about dick, fucking, what positions he liked;**
- 129. Male employee would routinely lift up his shirt, showing off his abs;**
- 130. Male employee would tell Ms. Molella that she had an ass like Kim Kardashian;**
- 131. Male employee would tell Ms. Molella that she had a big ass for a white girl;**
- 132. Male employee would ask how big Ms. Molella's boyfriend's dick was;**

- 133. Male employee would grab another male employee's clothed genitals in Ms. Molella's presence;**
- 134. Male employee would say he was fucking like a jack rabbit all night;**
- 135. Male employee would comment if a woman was thick;**
- 136. Male employee would make comments on a near daily basis about staying up all night to have sex;**
- 137. On a regular basis, male employee would make comments about how he likes rough sex;**
- 138. Male employee would say how Spanish and black guys have the biggest dicks;**
- 139. Male employee would take a tape measure and ask male employees to show what size their penis was;**
- 140. Male employee would ask another male co-worker if he was a top or bottom;**
- 141. Male employee asked if Ms. Molella had roast beef pussy;**
- 142. Male employee would ask Ms. Molella if she squirts;**
- 143. Male employee would ask Ms. Molella what her favorite position was;**
- 144. Male employee asked if Ms. Molella gave good head;**
- 145. Male employee said a female's pussy was so dry that only dust comes out of her;**
- 146. Male employee asked if Ms. Molella ever had anal sex;**
- 147. Male employee would make comments about male clients that he would "ruin;"**
- 148. Male employee would pinch another male employee's nipples;**
- 149. Male employee would ask about Ms. Molella's sexual relationship with her boyfriend and what positions he liked;**
- 150. Male employee would constantly make a groaning noise saying that's what Ms. Molella sounded like in bed;**

151. Male employee would tell Ms. Molella that he thought her boyfriend was hot and that he would have sex with him;
152. Male employee would lift up his shift and rub his nipples in Ms. Molella's presence;
153. Multiple employees would refer to Ms. Molella's lips as DSL (dick sucking lips) after she got lip filler;
154. Male employee would tell Ms. Molella that he didn't like her nails because they looked like stripper nails;
155. Male employee would say it would look so good to do a sexual act involving red lipstick;
156. Female employee would make comments about her vagina hurting from having too much sex last night;
157. Male employees would ask Ms. Molella if she was natural;
158. Male employees would regularly use profanity in front of Ms. Molella and customers including, "fucking," "bitch," "fucking dumb bitch," "asshole," "cunt," and "ass;"
159. Several female employees would cry from comments male co-workers were made about their weight, bodies, and appearance;
160. Female employee would cry to Ms. Molella that several male employees would call her a bitch and a cunt;
161. On a regular basis, female employee would pull on Ms. Molella's clothing;
162. Female employee would make comments about what Ms. Molella was eating and her weight;
163. Female employee would have to leave early to avoid seeing male employee who would stalk her as she walked to her car;
164. Female employee would tell Ms. Molella that male employee would offer her money, drugs and alcohol;

165. Ms. Molella witnessed male employees flirt with female employees on a near daily basis;
166. Male owner told Ms. Molella that she was not allowed to hire any male applicants;
167. Male owner would touch Ms. Molella's shoulder and arm frequently;
168. Male owner would stare at Ms. Molella's chest when she was speaking with him in her office;
169. Male owner would make comments to Ms. Molella such as, "Is the rope loose enough around your neck;"
170. Male director would engage in "locker room talk" with male owner regarding women's appearances;
171. Male employees would send Ms. Molella text messages of women's bodies;
172. Male employees would discuss sexual positions;
173. Male employee would make comments about women being on their periods;
174. Male director and male employees would use the following type of inappropriate sexual language in Ms. Molella's presence;
175. "Strip clubs;"
176. "Boobs;"
177. "Vagina;"
178. "Pussy;"
179. "Blow job;"
180. "Bitch;"
181. "Cunt;"
182. "My wife is a bitch;"

**183. “My wife is a cunt;”**

**184. Ms. Molella was terminated shortly after complaining about a male director inappropriately massaging a female customer’s shoulders;**

**185. As Ms. Molella was being terminated, male director followed her to her car to scream at her;**

**186. Male manager(s)/employee(s) continually made inappropriate sexual comments and jokes; and,**

**187. Male manager(s)/employee(s) continually touched Ms. Molella.**

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

29. Ms. Molella was terminated for pretextual reasons in or around October, 2024, in retaliation for her complaints about and failure to accede to the harassment/tortious conduct.

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

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

32. 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.

33. 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.

34. The male employees 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.

35. Corporate Defendants, through their owners/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.

36. 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.

37. 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.

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

39. Plaintiff rejected and complained about the above-described conduct.
40. Plaintiff found the above-described conduct totally unwelcome and offensive.
41. The above-described conduct occurred at Corporate Defendants' workplace or while conducting Defendant's business.
42. Plaintiff reported the male employee(s)' behavior to owners/officers/managers/supervisors of Corporate Defendants.
43. Plaintiff was an excellent employee who performed her job above Corporate Defendants' and industry standards.
44. Plaintiff suffered damages as a direct and proximate result of the conduct alleged in this Complaint.

**COUNT ONE**

**MOLELLA V. CORPORATE DEFENDANTS**  
**INTENTIONAL OR RECKLESS INFLECTION OF EMOTIONAL DISTRESS**

45. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.
46. This is an action for intentional or reckless infliction of emotional distress by Corporate Defendants.
47. Corporate Defendants acted recklessly or intentionally.
48. Corporate Defendants' conduct was extreme and outrageous.
49. Corporate Defendants' conduct caused Plaintiff emotional distress.
50. Plaintiff's emotional distress was severe.

51. 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.

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

53. 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.

54. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

55. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

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

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

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

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

60. 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.

61. 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.

62. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**COMMON LAW BATTERIES**

63. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

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

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

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

67. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**CIVIL ASSAULTS**

68. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

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

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

71. 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.

72. 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.

73. 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.

74. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**NEGLIGENT SUPERVISION**

75. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

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

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

78. Corporate Defendants breached that duty.

79. 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.

80. Corporate Defendants breached that duty.

81. 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.

82. 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.

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

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

85. 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.

86. 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.

87. 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.

88. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**NEGLIGENT RETENTION**

89. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

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

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

92. Corporate Defendants breached that duty.

93. 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.

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

95. 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.

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

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

98. 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.

99. 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.

100. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT OF 1992,**  
**SECTIONS 760.01-760.11, FLA.STAT.**  
**SEXUAL HARASSMENT/DISCRIMINATION**

101. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

102. Plaintiff, as a female employee, has belonged to a protected group within Section 760.10, Fla. Stat.

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

104. During the course of her employment with Corporate Defendants, Plaintiff was repeatedly subjected to a sexually hostile work environment and to unwelcome sexual harassment/discrimination by 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.

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

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

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

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

109. 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."

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

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

112. 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**  
**MOLELLA V. CORPORATE DEFENDANTS**  
**VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT OF 1992,**  
**SECTIONS 760.01-760.11, FLA.STAT.**  
**RETALIATION**

113. Plaintiff restates and realleges Paragraphs 1 through 44, as if fully set forth herein.

114. Plaintiff, as a female employee, has belonged to a protected group within Section 760.10, Fla. Stat.

115. Corporate Defendants were/are employer(s) under Section 760.02, Fla. Stat., employing 15 or more employees for each working day Plaintiff's employment.

116. Plaintiff engaged in statutorily protected expression.

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

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

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

120. Corporate Defendants retaliated against Plaintiff because Plaintiff challenged, opposed and complained of the unlawful practices of Corporate Defendants alleged in this Complaint.

121. Plaintiff was retaliated against and discharged from her employment by Corporate Defendants for pretextual reasons and in retaliation for her complaints

regarding the sexually hostile work environment and retaliation, and in retaliation for her refusal to accede to the above-described conduct.

122. 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 are attached hereto as Plaintiff's Exhibit "A."

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

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

125. 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.

**JURY DEMAND**

Plaintiff demands trial by jury.

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Telephone: (561) 995-9990  
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BY:

/s/ Olivia Povedano

OLIVIA F. POVEDANO

Florida Bar No.: 1051680

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# **Exhibit “A”**

| CHARGE OF DISCRIMINATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | Charge Presented To: Agency(ies) Charge No(s):                                                                               |                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  | <input checked="" type="checkbox"/> FEPA<br><input checked="" type="checkbox"/> EEOC                                         | 510-2025-10675                                        |
| Florida Commission on Human Relations and EEOC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |                                                                                                                              |                                                       |
| State or local Agency, if any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                                                                              |                                                       |
| Name (Indicate Mr., Ms., Mrs.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  | Home Phone (Incl. Area Code)                                                                                                 | Date of Birth                                         |
| Ms. Leanne M. Molella                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |                                                                                                                              |                                                       |
| 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | No. Employees, Members                                                                                                       | Phone No. (Incl. Area Code)                           |
| Brazilian Court Hotel/Salon/Club/Beach Club/One Brazilian Court Salon/Condo Assoc, et al.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  | 15+                                                                                                                          | (561) 665-7740                                        |
| Street Address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  | City, State and ZIP Code                                                                                                     |                                                       |
| 301 Australian Ave., Palm Beach, FL 33480; 1801S. Australian Ave., West Palm Beach, FL 33409                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |                                                                                                                              |                                                       |
| Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | No. Employees, Members                                                                                                       | Phone No. (Incl. Area Code)                           |
| ADP Totalsource Co XXI Inc., et al.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |                                                                                                                              |                                                       |
| Street Address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  | City, State and ZIP Code                                                                                                     |                                                       |
| 10200 Sunset Drive, Miami, FL 33173                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |                                                                                                                              |                                                       |
| DISCRIMINATION BASED ON (Check appropriate box(es).)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |                                                                                                                              | DATE(S) DISCRIMINATION TOOK PLACE                     |
| <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |                                                                                                                              | Earliest Latest                                       |
| <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                                                                              | Oct 7, 2024                                           |
| <input type="checkbox"/> OTHER (Specify)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |                                                                                                                              | <input checked="" type="checkbox"/> CONTINUING ACTION |
| THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                                                                                                              |                                                       |
| <p><b>I. STATEMENT OF PERSONAL HARM:</b><br/>I was hired/worked as a receptionist and salon manager in Palm Beach. I was discriminated against based on and because of my sex (female). I was discriminated against, harassed and retaliated against by male 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. I was subjected to a sexually hostile environment, including constant sexually 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. In 2025 I was denied additional pay/monies which had been owed/promised to me.</p> <p><b>II. RESPONDENT'S REASON FOR PERSONAL HARM:</b><br/>I was not given a reason.</p> <p><b>III. DISCRIMINATION STATEMENT:</b><br/>I have been discriminated against, harassed and/or retaliated against because of my sex in violation of the Florida Civil Rights Act of 1992 as amended, §760.01 - 760.11, Fla. Stat.; and, Title VII of the Civil Rights Act of 1964, as amended. 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. When I complained I was retaliated against.</p> |  |                                                                                                                              |                                                       |
| 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. |                                                       |
| 07/25/2025<br>Date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  | SIGNATURE OF COMPLAINANT                                                                                                     |                                                       |
| Leanne molella (Jul 25, 2025 14:03:44 EDT)<br>Charging Party Signature                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  | SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE<br>(month, day, year)                                                            |                                                       |

# COD - Molella

Final Audit Report

2025-07-25

|                 |                                              |
|-----------------|----------------------------------------------|
| Created:        | 2025-07-25                                   |
| By:             | William Julien (wjulien@attorneyjulien.com)  |
| Status:         | Signed                                       |
| Transaction ID: | CBJCHBCAABAAjHrBdYGCISpNmKhXXaoQA7Ulaq6mgwi- |

## "COD - Molella" History

-  Document created by William Julien (wjulien@attorneyjulien.com)  
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-  Document emailed to leannemolella@aol.com for signature  
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2025-07-25 - 5:55:48 PM GMT- IP address: 140.248.44.0
-  Signer leannemolella@aol.com entered name at signing as Leanne molella  
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-  Document e-signed by Leanne molella (leannemolella@aol.com)  
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-  Agreement completed.  
2025-07-25 - 6:03:44 PM GMT

