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LAW OFFICES OF ROY L. LANDERS  
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Attorney for Plaintiff, Faustino Ambaosio

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CLERK, U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION  
**ED CV 04 - 00257** (SGLX)

FAUSTINO AMBAOSIO  
Plaintiff,  
vs.

VINCE UPIERRE, dba BURGER KING,  
SEVEN TREES SHOPPING CENTER AND  
DOES 1-10 Inclusive,  
Defendants.

) Case No.:  
)  
) COMPLAINT FOR DAMAGES RE:  
) VIOLATION OF CIVIL RIGHTS ON  
) BASIS OF DISCRIMINATION IN  
) PUBLIC ACCOMMODATIONS; UNFAIR,  
) UNLAWFUL AND FRAUDULENT BUSINESS  
) PRACTICES; NEGLIGENT INFLICTION  
) OF EMOTIONAL DISTRESS;  
) INTENTIONAL INFLICTION OF  
) EMOTIONAL DISTRESS; DEMAND FOR  
) JURY TRIAL  
)  
)  
)

I

JURISDICTION AND VENUE

1. (a) Jurisdiction of this action is invoked on the basis of 28 USC 1331 and 1343, 42 USC 12101-12102, 12181-12183 and 12201, et. seq., which is applicable to causes of action where persons with disabilities have been denied their civil rights. Venue in the Central Judicial District of California (Eastern Division) in the United States District Court is in accord with 28. U.S.C. section 1391(b) because a substantial part of plaintiff's claims arose

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1 within the Judicial District of the United States District Court  
2 of the Central District of California.

3 (b) Supplemental Jurisdiction. The Judicial District of the  
4 United States District Court of the Central District of California  
5 has supplemental jurisdiction over the state claims alleged in  
6 this Complaint pursuant to 28 U.S.C. section 1367(a).  
7 Supplemental jurisdiction is appropriate in this action on the  
8 basis that all the causes of action or claims derived from federal  
9 law and those arising under state law, as herein alleged, arose  
10 from a common nucleus of operative facts. The common nucleus of  
11 operative facts, include, but are not limited to, the incidents  
12 whereby plaintiff was denied full and equal access to Defendant's  
13 facilities, goods, and/or services in violation of both federal  
14 and state laws when plaintiff attempted to enter, use, and/or exit  
15 Defendant's facilities as described within this Complaint.  
16 Further, due to this denial of full and equal access Plaintiff and  
17 other person's with disabilities were injured. Based upon such  
18 allegations the state actions, as stated herein, are so related to  
19 the federal actions that they form part of the same case or  
20 controversy, and the actions would ordinarily be expected to be  
21 tried in one judicial proceeding.

22 **II**

23 **PARTIES**

24 2. Defendant Vince Upierre, dba Burger King was and at all times  
25 herein mentioned was a duly organized business, association, or  
26 corporation duly authorized to exist and operate within the State  
27 of California and County of San Bernardino and the owner, lessee,  
28

1 or tenant of the premises located at 1920 East Highland San  
2 Bernardino, California.

3 3. Plaintiff is informed and believes and thereon alleges that  
4 defendant Seven Trees Shopping Center is the owner and/or landlord  
5 of the subject property upon which defendant business is sited.

6 4. Plaintiff is informed and believes and thereon alleges that  
7 each of the named defendants herein operates a business and  
8 or/facility of public accommodation as defined and described  
9 within 42 USC 12181(7)(B) of the American with Disabilities Act  
10 [ADA] and as such must comply with the ADA under provisions of  
11 Title III therein.

12 5. Plaintiff is ignorant of the defendants sued as Does 1-10  
13 herein, and therefore sues them in their fictitious names as Doe  
14 defendants. Plaintiff is informed and believes and thereon alleges  
15 that Does 1-10 are the owners, operators, lessees or tenants of  
16 the subject property and each of the Doe defendants at all times  
17 herein was acting as the agent and or representative of each other  
18 and thereby are responsible in some manner for the injuries and  
19 damages complained of herein. Plaintiff will seek leave of court  
20 to amend this complaint to name Doe defendants when the same is  
21 ascertained.

### 22 III

#### 23 GENERAL ALLEGATIONS COMMON TO ALL CLAIMS

24 6. Plaintiff is a male who is disabled and confined to a  
25 wheelchair. He has no control over his lower extremities and must  
26 use a wheelchair to transport himself and to affect the basic  
27 necessities of his everyday existence. Plaintiff's disability  
28 substantially limits one or more of life's major activities and

1 therefore he is disabled as defined under 42 USC

2 12102(2) (A) (B) (C).

3 7. On or about September 10, 2003 plaintiff patronized the  
4 premises of defendants to utilize goods and/or services offered by  
5 defendants. When Plaintiff attempted to gain access to the goods  
6 and/or services offered by defendants he encountered access  
7 barriers because the premises failed to comply with federal ADA  
8 Access Guidelines For Building and Facilities [hereinafter  
9 "ADAAG"]; Department of Justice [DOJ] regulations at 28 CFR.  
10 36.201; 36.304 and/or the State of California's Title 24 Building  
11 Code Requirements.

12 8. The specific difficulty Plaintiff had in entering and utilizing  
13 Defendants' facility and which amount to a violation of ADAAG, DOJ  
14 regulations and Title 24 of the California Building Code are:

- 15 (a) Lack of site entrance signage as required by Title 24  
16 1129B.5
- 17 (b) Lack of access aisle (NO PARKING) warning sign as required  
18 by Title 24 1129B.4.1&2.
- 19 (c) Lack of designated van accessible parking space as required  
20 by ADAAG 4.1.2(5) (b) and Title 24 1129B.4.2.; ADAAG  
21 4.1.2(5) (a) and Title 24 1129B.1.
- 22 (d) Lack of van accessible aisle as required by ADAAG 4.6.3 and  
23 Title 24 1129B.4.2.
- 24 (e) No signage in accord with ADAAG 4.6.4 and Title 24 1129B.5.
- 25 (f) Entrance signage is not at every entrance/exit as required  
26 by ADAAG 4.1.3(16) (b) and Title 24 1127B.3.
- 27 (g) Lack of regular access aisle as required by Title 24  
28 1129B.4.1

- 1 (h) Curb ramp location does not comply with ADAAG 4.7.1.
- 2 (i) Curb ramp projects into vehicular traffic lanes - ADAAG  
3 4.7.6
- 4 (j) Facility seating does not comply with ADAAG 4.1.3(16)(b)  
5 and Title 24 1104B.5.4.; ADAAG 5.1 and Title 24 1104B.5.4;  
6 ADAAG 4.2.4.1 and Title 24 1122B.3; ADAAG 4.32.3 and Title  
7 24 1122B.3; ADAAG 4.32.4; ADAAG 5.3 and Title 24 1104B.5.4
- 8 (k) Accessories/fixtures are not are proper height as required  
9 by ADAAG 4.23.7 and Title 24 1115B.9.2
- 10 (l) Hardware does not comply with ADAAG 4.13.9 and Title 24  
11 1133B. 2.5.1.
- 12 (m) Drain and hot water pipes are not insulated or covered -  
13 ADAAG 4.24.6
- 14 (n) Bathroom international symbol of accessibility is lacking  
15 per ADAAG 4.30.6 and title 24 1117B.5.9.
- 16 (o) Lack of raised Braille characters per ADAAG 4.30.4 and  
17 Title 24 1117B.5.9
- 18 (p) Wall mount signage does not comply with ADAAG 4.1.2(7)(d)  
19 and Title 24 1117B.5.1.1 & 5.6.3; ADAAG 4.30.6 and Title 24  
20 1117B.5.9.
- 21 (q) Faucet fixtures do not comply with ADAAG 4.27.4 and Title  
22 24 1508.1&2.
- 23 (r) Water closet mounting/location does not comply with ADAAG  
24 4.23.4 and Title 24 1115B.7.1.4.
- 25 (s) Width between walls (front transfer stall) do not comply  
26 with ADAAG 4.23.4 and Title 24 1115B.7.1.4
- 27 (t) Toilet stall size does not comply with ADAAG 4.17.3 and  
28 Title 24 1115B.1.

1 (u) Vestibules/Two doors in series do not comply with ADAAG  
2 4.13.7 and Title 24 1133B.2.4.4.

3 (v) Kick plate at doors do not comply with Title 24 1133B.2.6.

4 9. Based upon the above facts, Plaintiff as been discriminated  
5 against and will continue to be discriminated against unless and  
6 until Defendants are enjoined and forced to cease and desist from  
7 continuing to discriminate against Plaintiff and others similarly  
8 situated.

9 10. Pursuant to federal [ADA], Title 28 CFR 36.201; 36.203;  
10 36.304; 36.305 and state law [California Title 24], Defendants are  
11 required to remove barriers to their existing facilities.

12 Defendants have been put on notice pursuant to the ADA and  
13 California Civil Codes [51,52] prior to the statutory effect of  
14 the ADA on January 26, 1992 that Defendants and each of them had a  
15 duty to remove barriers to persons with disabilities such as  
16 plaintiff. Defendants also knew or should have known that  
17 individuals such as plaintiff with a disability are not required  
18 to give notice to a governmental agency prior to filing suit  
19 alleging Defendants' failure to remove architectural barriers.

20 11. Plaintiff believes and thereon allege that Defendants'  
21 facilities, as described herein, have other access violations not  
22 directly experienced by Plaintiff, which preclude or limit access  
23 by others with disabilities, including, but not limited to, Space  
24 Allowances, Reach Ranges, Accessible Routes, Protruding Objects,  
25 Ground and Floor Surfaces, Parking and Passenger Loading Zones,  
26 Curb Ramps, Ramps, Stairs, Elevators, Platform Lifts (Wheelchair  
27 Lifts), Windows, Doors, Entrances, Drinking Fountains, and Water  
28 Coolers, Water Closets, Toilet Stalls, Urinals, Lavatories and

1 Mirrors, Sinks, Storage, Handrails, Grab Bars, Telephones,  
2 Controls and Operating Mechanisms, Alarms, Detectable Warnings and  
3 Signage. Accordingly, Plaintiff alleges Defendants are required to  
4 remove all architectural barriers, known or unknown. Also,  
5 Plaintiff alleges Defendants are required to utilize the ADA  
6 checklist for Readily Achievable Barrier Removal approved by the  
7 United States Department of Justice and created by Adaptive  
8 Environments.

9 12. Plaintiff desires to return to Defendants' places of business  
10 and utilize their facilities without being discriminated against  
11 in the immediate future.

#### 12 IV

#### 13 FIRST CAUSE OF ACTION

#### 14 (Violation of Civil Rights-American With Disabilities Act)

15 13. Plaintiff realleges the allegations in paragraphs 1 through 12  
16 as though set forth fully herein.

#### 17 **Claim 1: Denial of Full and Equal Access**

18 14. Based on the facts asserted above Plaintiff has been denied  
19 full and equal access to Defendants' goods, services, facilities,  
20 privileges, advantages, or accommodations. Defendant business is a  
21 public accommodation owned, leased and/or operated by Defendants  
22 and each of them. Defendants' existing facilities and/or services  
23 failed to provide full and equal access to Defendants' facility as  
24 required by 42 U.S.C. section 12182(a). Thus, Plaintiff was  
25 subjected to discrimination in violation of 42 U.S.C.  
26 12182(b) (2) (A) (ii) (iv) and 42 U.S.C. section 12188 because  
27 Plaintiff was denied equal access to Defendants' existing  
28 facilities.

1 15. Plaintiff has a physical impairment as alleged herein because  
2 his condition affects one or more of the following body systems:  
3 neurological, musculoskeletal, special sense organs, and/or  
4 cardiovascular. Further, his physical impairments substantially  
5 limits one or more of the following major life activities:  
6 [walking]. In addition, Plaintiff cannot perform one or more of  
7 the said major life activities in the manner speed, and duration  
8 when compared to the average person. Moreover, Plaintiff has a  
9 history of or has been classified as having a physical impairment  
10 as required by 42 U.S.C. section 12102(2)(A).

11 **Claim 2: Failure To Remove Architectural Barriers**

12 16. Based upon the facts alleged herein, Plaintiff was denied  
13 full and equal access to Defendants' goods, services, facilities,  
14 privileges, advantages, or accommodations within a public  
15 accommodation owned leased, and/or operated by the named  
16 Defendants. Defendants individually and collectively failed to  
17 remove barriers as required by 42 U.S.C. 12182(a) and 28 CFR  
18 36.304. Plaintiff is informed and believes, and thus alleges that  
19 architectural barriers which are structural in nature exist at the  
20 following physical elements of Defendants' facilities:  
21 Space Allowance and Reach Ranges, Accessible Route, Protruding  
22 Objects, Ground and Floor Surfaces, Parking and Passenger Loading  
23 Zones, Curb Ramps, Ramps, Stairs, Elevators, Platform Lifts  
24 (Wheelchair Lifts), Windows, Doors, Entrances, Drinking Fountains  
25 and Water Coolers, Water Closets, Toilet Stalls, Urinals,  
26 Lavatories and Mirrors, Sinks, Storage, Handrails, Grab Bars, and  
27 Controls and Operating Mechanisms, Alarms, Detectable Warnings,  
28 Signage, and Telephones. Pursuant to 42 USC section



1 12182(b)(2)(iv) and 28 CFR 36.304 Title III requires places of  
2 public accommodation to remove architectural barriers that are  
3 structural in nature within existing facilities. Failure to remove  
4 such barriers and disparate treatment against a person who has a  
5 known association with a person with a disability are forms of  
6 prohibited discrimination. Accordingly, Plaintiff was subjected to  
7 discrimination in violation of 42 USC 12182(b)(2)(A)(iv) and 42  
8 USC 12182 (b)(2)(A)(iv) and 42 USC 12188.

9 **Claim 3: Failure To Modify Practices, Policies And Procedures**

10 17. Based on the facts alleged in this Complaint Defendants failed  
11 and refused to provide a reasonable alternative by modifying its  
12 practices, policies and procedures in that they failed to have a  
13 scheme, plan, or design to assist Plaintiff and/or others  
14 similarly situated in entering and utilizing Defendants' services,  
15 as required by 42 U.S.C. section 12188(a). Thus, Plaintiff was  
16 subjected to discrimination in violation of 42 U.S.C. section  
17 12182(b)(2)(A)(iv); 28 CFR 36.302 and 42 U.S.C. section 12188  
18 because Plaintiff was denied equal access to Defendants' existing  
19 facilities.

20 18. As a result of the wrongful and discriminatory practices of  
21 defendants, plaintiff has suffered actual damages consisting of  
22 special damages and general damages in an amount to be determined  
23 at time of trial herein.

24 19. Pursuant to the provisions of 42 USC 12188 plaintiff seeks  
25 injunctive relief and an order directing defendants to cease and  
26 desist from discriminating against plaintiff and others similarly  
27 situated and for an order that defendants comply with the  
28 Americans With Disabilities Act forthwith.

1 20. Under the provisions of 42 USC 12205 plaintiff is entitled to  
2 an award of reasonably attorneys fees and requests that the court  
3 grant such fees as are appropriate.

4 **VI**

5 **SECOND CAUSE OF ACTION**

6 **(Violation Of Civil Rights Under California Accessibility Laws)**

7 21. Plaintiff realleges the allegations of the First Cause of  
8 Action as though set forth fully herein.

9 **(a) Denial Of Full And Equal Access**

10 22. Plaintiff has been denied full and equal access to Defendants'  
11 goods services, facilities, privileges, advantages, or  
12 accommodations within a public accommodation owned, leased, and/or  
13 operated by Defendants in violation of California Civil Code  
14 Sections 54 and 54.1; California Health and Safety Code Section  
15 19955 and California Government Code Section 12948. The actions of  
16 Defendants also violate the provisions of Title 24 of the State of  
17 California Building Codes with regard to accessibility for persons  
18 with disabilities by failing to provide access to Defendants  
19 facilities due to violations pertaining to accessible routes,  
20 ground and floor surfaces, parking and passenger loading zones,  
21 curb ramps, ramps, stairs, elevators, platform lifts (wheelchair  
22 lifts), windows, doors, toilet stalls, urinals, lavatories and  
23 mirrors, sinks, storage, handrails, grab bars, controls and  
24 operating mechanisms  
25 alarms, detectable warnings, signage and telephones.

26 23. On the above basis Plaintiff has been wrongfully discriminated  
27 against.

28 //



1 28. By reason of their acts and denial of Plaintiff's civil rights  
2 Defendants also violated the provisions of Cal. Civ. Code section  
3 52, which makes a person or entity in violation of Cal.Civ. Code  
4 51 liable for the actual damages to a Plaintiff including treble  
5 damages where appropriate.  
6

7 29. Defendants and each of them, at all times prior to and  
8 including September 2003, respectively and continuing to the  
9 present time, knew that persons with physical disabilities were  
10 denied their rights of equal access to all portions of this public  
11 facility. Despite such knowledge, Defendants, and each of them,  
12 failed and refused to take steps to comply with the applicable  
13 access statutes and despite knowledge of the resulting problems  
14 and denial of civil rights suffered by Plaintiff and other  
15 similarly situated persons with disabilities.  
16  
17

18 30. Defendants and each of them have failed and refused to take  
19 action to grant full and equal access to person with physical  
20 disabilities. Defendants have carried out a course of conduct of  
21 refusing to respond to, or correct complaints about unequal access  
22 and have refused to comply with their legal obligations to make  
23 the subject facility accessible pursuant the ADAAG and the  
24 California Building Code [Title 24 of the California Code of  
25 Regulations]. Such actions and continuing course of conduct by  
26 Defendants, and each of them, evidence despicable conduct in  
27  
28 conscious disregard of the rights and/or safety of Plaintiff and

1 those similarly situated and thus justify an award of treble  
2 damages pursuant to section 52(a) and 54.3(a) of the Cal.Civ. Code  
3 or alternatively an award of punitive damages in an appropriate  
4 amount.  
5

6 31. Plaintiff has suffered emotional and physical damage and  
7 continues to suffer such damages all in an amount to be determined  
8 at time of trial.

9 32. Under the provisions of Cal. Civ. Code section 55 Plaintiff  
10 seeks an award of reasonable attorney's fees and costs as a result  
11 of having to bring this action. Plaintiff requests the court to  
12 award such fees in an appropriate amount.  
13

#### 14 VIII

#### 15 FOURTH CAUSE OF ACTION

#### 16 (Unfair And Unlawful Business Practice)

17 33. Plaintiff realleges the allegations of the Third Cause of  
18 Action as though set forth fully herein.

19 34. California Business and Professions Code Section 17200 states  
20 in pertinent part:

21 "As used in this chapter, unfair competition shall mean and  
22 include any unlawful, unfair or fraudulent business act..."

23 35. Defendants, as alleged herein, are in violation of the  
24 Americans With Disabilities Act and Title 24 of the California  
25 Building Code, in that they have denied equal access to their  
26 places of public accommodation to Plaintiff and others similarly  
27 situated to Plaintiff. Defendants have failed and refused and  
28

1 continue to refuse to comply with equal access laws all in  
2 violation of 42 USC 12181-12183; 28 CFR 36.304 and 42 USC 12188.  
3 In addition the complained of acts are in violation of California  
4 Civil Code Sections 51,52, 54,and 54.1,; California Health and  
5 Safety Code section 19955 all of which require Defendants to  
6 provide equal access to their facility to disabled persons such as  
7 plaintiff. Defendants are also in violation of the indicated  
8 statutes because of their failure to remove architectural  
9 barriers, which prevent equal access to their facility by disabled  
10 persons and because of their failure to modify their practices,  
11 policies and procedures to have a scheme, plan, or design to  
12 assist Plaintiff and others similarly situated to enter and  
13 utilize Defendants' services as required by the Unruh Act.  
14

15  
16  
17 36. Defendants' acts are unlawful and unfair and are therefore in  
18 violation of California Business and Professions Code section  
19 17200.

20  
21 37. Pursuant to the provisions of California Business and  
22 Professions Code section 17201 Plaintiff is a person as identified  
23 within said section and therefore allowed to bring this action on  
24 behalf of himself and the general public to effectuate California  
25 Business and Professions Code 17200 as provided for within  
26 Business and Professions Code section 17204.

27  
28 38. Thus, Plaintiff, under Bus & Prof. Code section 17200 seeks  
injunctive relief, on behalf of himself and the general public,

1 requiring Defendants to remedy the disabled access violations  
2 present within Defendants' facility and that Defendants be ordered  
3 to cease and desist from continuing in noncompliance with disabled  
4 access statutes and regulations.  
5

6 **IX**

7 **FIFTH CAUSE OF ACTION**

8 **(Negligent Infliction of Emotional Distress)**

9  
10 39. Plaintiff relleges the allegations of the Fourth Cause of  
11 Action as though set forth fully herein.

12 40. Defendants and each of them owed a duty to Plaintiff to make  
13 their facility accessible and to keep Plaintiff reasonably safe  
14 from known dangers and risks of harm. This duty arises by virtue  
15 of the legal duties proscribed by various federal and state  
16 statutes including, but not limited to, ADA, ADAAG, California  
17 Civil Code sections 51, 52, 54, 54.1 and Title 24 of the  
18 California Code of Regulations. Defendants had a duty of due care  
19 not to do or cause anything to happen that would subject Plaintiff  
20 to undue stress, embarrassment, chagrin, and discouragement.  
21

22 41. Defendants breached their duty of care to Plaintiff by the  
23 actions and inaction complained of herein and as a result thereof  
24 Plaintiff was shocked, discouraged, embarrassed and outraged at  
25 the callousness and disregard of Defendants. Defendants knew or  
26 had reason to know that by denying Plaintiff equal access to their  
27 facility and failing and refusing to remove architectural  
28

1 had reason to know that by denying Plaintiff equal access to their  
2 facility and failing and refusing to remove architectural  
3 barriers, Plaintiff would suffer emotional and/or mental distress  
4 because of such discrimination and disparate treatment. Defendants  
5 breached their duty of care to plaintiff by the perpetration of  
6 the acts outlined herein.  
7

8 42. As a proximate result of the actions of Defendants Plaintiff  
9 did suffer emotional and mental stress and pain and suffering all  
10 in an amount to be determined at time of trial.  
11

12 **X**

13 **SIXTH CAUSE OF ACTION**

14 **(Intentional Infliction of Emotional Distress)**

15 43. Plaintiff realleges the allegations of the Fifth Cause of  
16 Action as though set forth fully herein.

17 44. The actions of Defendants and each of them are despicable,  
18 intentional and done with conscious disregard of the rights and  
19 safety of Plaintiff and as such should be regarded as outrageous.

20 45. As a proximate result of Defendants' actions Plaintiff has  
21 suffered severe emotional and mental distress all to his damage in  
22 an amount to be determined at time of trial.

23 46. Plaintiff seeks an award of punitive damages for this claim as  
24 the actions of Defendants are tantamount to outrageous conduct and  
25 subject them to exemplary damages.

26 WHEREFORE PLAINTIFF PRAYS:

- 27 1. For general damages according to proof;  
28 2. For special damages according to proof;



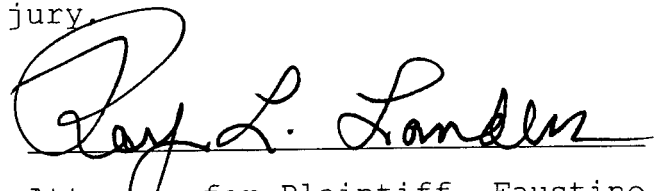
- 1 3. For damages pursuant to Cal. Civil Code section 52, in the
- 2 amount of \$4,000 for each and every offense of California Civil
- 3 Code section 51, Title 24 of the California Building Code and the
- 4 Americans With Disabilities Act.
- 5 4. For Injunctive relief pursuant to 42 U.S.C. 12188(a) and
- 6 California Business and Professions Code section 17200
- 7 5. For an award of attorney's fees pursuant to 42 U.S.C. 1988, 42
- 8 U.S.C. 12205 and Cal. Civ. Code section 55;
- 9 6. For treble damages pursuant to Cal. Civ. Code 52 (a);
- 10 7. For punitive damages according to proof;
- 11 8. For a Jury Trial;
- 12 9. For costs of suit incurred herein and;
- 13 10. For such other and further relief as the court deems proper.

14 Respectfully submitted,

15 **DEMAND FOR JURY**

16 Plaintiff respectfully requests that the claims made herein be  
17 heard and determined by a jury.

18  
19 Dated: 2/5/04

  
Attorney for Plaintiff, Faustino  
Ambaasio

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