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*Attorneys for Plaintiff Huong Chau*

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE**

HUONG CHAU, an individual

Plaintiff,

vs.

XUAN NGOC HO (aka THICH VIEN HUY),  
an individual; TANG HO (aka THICH VIEN  
LY), an individual; DIEU NGU BUDDHIST  
TEMPLE, an unknown entity; DIEU PHAP  
BUDDHIST TEMPLE, an unknown entity;  
INTERNATIONAL BUDDHIST  
CULTURAL HERITAGE FOUNDATION, a  
non-profit organization; and DOES 1 through  
125, inclusive,

Defendants.

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Case No.: 30-2025-01492515-CU-PO-CJC  
Assigned to Judge Jonathan Fish, Dept. C13

**FIRST AMENDED COMPLAINT FOR:**

- (1) **SEXUAL BATTERY**
- (2) **ASSAULT**
- (3) **FALSE IMPRISONMENT**
- (4) **VIOLATION OF THE RALPH ACT  
(CAL. CIV. CODE 51.7)**
- (5) **GENDER VIOLENCE (CAL. CIV.  
CODE 52.4)**
- (6) **HUMAN TRAFFICKING**
- (7) **AIDING AND ABETTING**
- (8) **NEGLIGENT  
SUPERVISION/PREMISE  
LIABILITY**
- (9) **HARASSMENT**
- (10) **RETALIATION IN VIOLATION OF  
THE FEHA**

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- (11) RETALIATION IN VIOLATION OF CAL. LABOR CODE SECTION 1102.5
- (12) FAILURE TO PREVENT DISCRIMINATION, HARASSMENT, AND RETALIATION
- (13) WRONGFUL TERMINATION
- (14) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
- (15) NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
- (16) FAILURE TO PAY MINIMUM WAGE
- (17) FAILURE TO PAY OVERTIME
- (18) FAILURE TO PROVIDE ACCURATE AND ITEMIZED WAGE STATEMENT
- (19) FAILURE TO PAY WAGES UPON TERMINATION
- (20) UNFAIR BUSINESS PRACTICES

**JURY TRIAL DEMANDED**

1 Plaintiff Huong Chau (“Ms. Chau” or “Plaintiff”) by and through her undersigned counsel,  
2 hereby alleges the following against Defendants Xuan Ngoc Ho aka Thich Vien Huy (“TVH”), Tang  
3 Ho aka Thich Vien Ly (“TVL”), Dieu Ngu Buddhist Temple (“Dieu Ngu Temple”), Dieu Phap  
4 Buddhist Temple (“Dieu Phap Temple”), International Buddhist Cultural Heritage Foundation, and  
5 Does 1-125 (“Does”) (collectively, the “Defendants”).

## 6 **INTRODUCTION**

7 Ms. Chau, a Buddhist nun, brings this action after she was sexually assaulted by Xuan Ngoc  
8 Ho aka Thich Vien Huy, the Abbot of Dieu Ngu Temple. To intimidate Ms. Chau and prevent her  
9 from reporting the sexual assault that she was subjected to, Xuan Ngoc Ho threatened, harassed, and  
10 further restricted Ms. Chau’s ability to leave the temple. When Ms. Chau expressed her intended to  
11 report Xuan Ngoc Ho, Xuan Ngoc Ho conspired with his brother Tang Ho aka Thich Vien Ly, the  
12 Abbot of Dieu Phap Temple, to weaponize Ms. Chau’s immigration status against her, and falsely  
13 represented that she had to leave the United States. At all times relevant, Ms. Chau was also employed  
14 by Dieu Ngu Temple and Dieu Phap Temple in a secular role. Defendants enticed Ms. Chau to come  
15 work for them through promises of obtaining green cards for her and her nephew. Ignoring well-  
16 settled California law, Defendants only paid Ms. Chau \$400 a month and regularly failed to provide  
17 her with rest and meal breaks, despite making her regularly work up to fifteen hours in a single day  
18 and seven days a week.

## 19 **PARTIES**

20 1. Plaintiff Huong Chau is an individual currently residing in Orange County, California.  
21 Ms. Chau does not speak or read English.

22 2. Defendant Xuan Ngoc Ho aka Thich Vien Huy (“TVH”) is an individual who held a  
23 position of authority, including Executive Vice President of the Leadership Counsel of the Unified  
24 Vietnamese Buddhist Congregation Overseas and is the Abbot of Dieu Ngu Temple. Upon  
25 information and belief, TVH is a resident of Orange County.

26 3. Defendant Tang Ho aka Thich Vien Ly (“TVL”) is an individual who held positions  
27 of authority, including Chairman of the Leadership Council of the Unified Vietnamese Buddhist  
28 Congregation Overseas, Abbot of Dieu Phap Temple, and Head of Dieu Ngu Temple. Upon

1 information and belief, TVL is a resident of Los Angeles County.

2 4. Defendant Dieu Ngu Buddhist Temple is a religious institution located at 14472  
3 Chestnut Street, Westminster, CA 92683 with Defendant TVH as its Abbot.

4 5. Defendant Dieu Phap Buddhist Temple is a religious institution located at 311 E  
5 Mission Road, San Gabriel, CA 91776 with Defendant TVL as its Abbot.

6 6. Defendant International Buddhist Cultural Heritage Foundation is an organization  
7 related to the Unified Vietnamese Buddhist Congregation Overseas, which oversees the temples  
8 (including Defendant Dieu Ngu Temple and Defendant Dieu Phap Temple) and their leadership.  
9 Upon information and belief, TVH and TVL are both officers of International Buddhist Cultural  
10 Heritage Foundation.

11 7. The true names and capacities, whether individual, corporate, or otherwise, of  
12 Defendants named herein as Does 1 through 10, inclusive, are unknown to Plaintiff at this time, and  
13 these Defendants are therefore sued by fictitious names. Plaintiff will amend this Complaint to state  
14 the true names and capacities of Does 1 through 10 when they have been ascertained, together with  
15 the appropriate charges and allegations. It is believed that Does 1-10 are individuals who participated  
16 in the decision and/or approved of the decision to discriminate against, harass, and/or retaliate against  
17 Plaintiff because of her protected classes and/or because she engaged in protected activity. Upon  
18 information and belief, at all times herein mentioned, each of the Defendants sued was the agent and  
19 employee of each of the remaining defendants and at all times was acting within the purpose and  
20 scope of such agency and employment.

### 21 **JURISDICTION AND VENUE**

22 8. This Court has jurisdiction over this action pursuant to the California Constitution,  
23 Article VI, Section 10, which grants the Superior Court “original jurisdiction in all causes except  
24 those given by statute to other courts.”

25 9. This Court has jurisdiction over Defendants because Defendants are citizens of  
26 California, have sufficient minimum contacts in California, and/or otherwise intentionally avails  
27 themselves of the California market so as to render the exercise of jurisdiction over them by the  
28 California courts consistent with traditional notions of fair play and substantial justice.

10. Venue is proper in this Court because the events giving rise to this action occurred in this county, and/or both the plaintiff and the defendants reside or is located in this county.

11. Plaintiff has submitted the requisite notice to the Labor and Workforce Development Agency pursuant to California Labor Code § 2699.3 and intends to amend this Complaint to add a cause of action under the Private Attorneys General Act (Labor Code §§ 2698, *et seq.*) following the expiration of the statutory waiting period and/or the Agency's response.

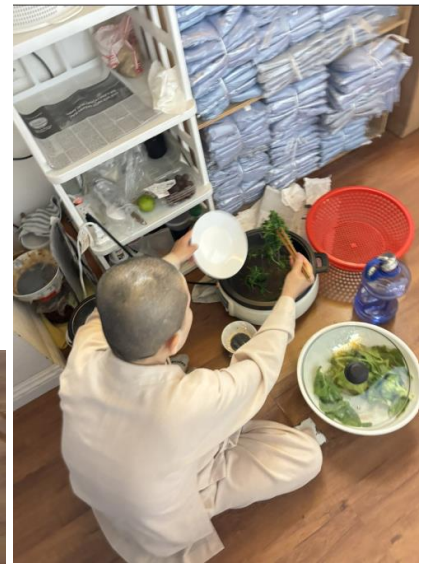
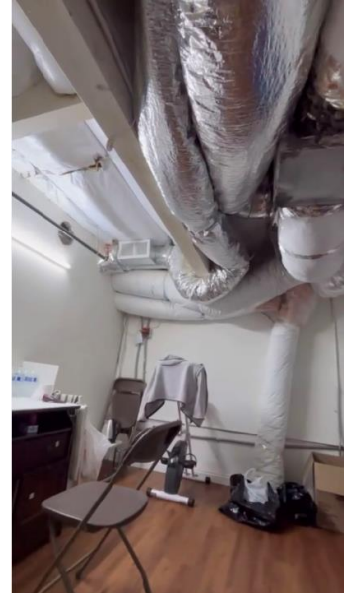
12. Plaintiff has timely obtained a right-to-sue from the California Civil Rights Department.

## GENERAL ALLEGATIONS

### **Ms. Chau's Employment and Substandard Living Conditions**

13. On or about January 29, 2024, Ms. Chau began her employment at Dieu Ngu Temple, Dieu Phap Temple, and IBCHF. Defendants told Ms. Chau that she would need to come to the United States with all her immigration paperwork and start her employment. Defendants informed Ms. Chau that their counsel advised them that she would need to work for at least 3 months before she can apply for the R-1 visa. At the Dieu Ngu Temple, her supervisor was TVH. At the Dieu Ngu Temple, her supervisor was TVL.

14. During most of her employment, Ms. Chau, a Buddhist nun for approximately twenty years, resided at the Dieu Ngu Temple. Her living conditions were substandard for any human being. Her primary quarters consisted of a 10 x 10 foot room that had no windows or fire escape, no bathroom, no running water, no heating and/or air conditioning, and had structural defects such as exposed wiring and a low ceiling. When it rained, water would leak through the faulty pipes and vents and flood Ms. Chau's room. Defendants provided Ms. Chau with only a desk. For purposes of sleeping, Defendants provided her with a sleeping bag. For meals, Ms. Chau and the other nuns would generally cook on the floor of the dorm area. Below are a few pictures of Ms. Chau's living conditions.



15. Defendants enticed Ms. Chau to come to the United States and to work for them based on their promise that they would help her to obtain a green card. Defendants further promised Ms. Chau that if she came to the United States to work for them, they would apply for a green card for her nephew. Prior to coming to the United States, Ms. Chau was in line for leading her own Buddhist temple and was tasked with lecturing church attendees on Buddhist principles and meditation. In other words, she advanced the core principles and tenets of Buddhism. But to accept Defendants' offer, Ms. Chau would have to forego her situation in Vietnam. However, the opportunity Defendants



1 offered to Ms. Chau was unique in that it would allow her to continue practicing the Buddhist religion  
2 as a nun in the United States and lead to United States citizenship. Moreover, the ability to obtain a  
3 green card for her nephew would be life-changing for him and her family.

4 16. However, once she started working for Defendants, it became readily apparent that  
5 Defendants intended to utilize Ms. Chau as an indentured servant to complete mainly secular tasks  
6 while refusing to pay Ms. Chau the minimum wage. These tasks include but are not limited to: (i)  
7 administering and managing the office at Dieu Ngu Temple, (ii) processing donations to the temple,  
8 (iii) selling meals to the general public, and (iv) ensuring that the office was clean. Ms. Chau also  
9 worked in the store for Dieu Ngu Temple, which sold products to the general public. Ms. Chau was  
10 also expected to cook meals that Dieu Ngu Temple sold to the general public and to feed other  
11 employees of the Dieu Ngu Temple. Ms. Chau further provided janitorial and gardening services to  
12 the entire temple. Ms. Chau regularly worked upwards of 15 hours a day, and regularly did not  
13 receive the meal and rest break periods as required under California law. Despite her long hours and  
14 being required to work seven days a week, Ms. Chau was only paid \$300-\$400 per month, well below  
15 the minimum wage. Ms. Chau's monthly wage was not based on any written schedule or calculation.  
16 Instead, Defendants would pay her monthly wage based on their whims for that day.

17 17. Although Buddhism generally discourages alcohol consumption by those who practice  
18 the religion, TVH surreptitiously purchased large amounts of alcohol for his personal consumption  
19 on a regular basis. To hide these transactions, TVH would go with another monk, Duc Tri, to purchase  
20 alcohol using cash donated to Defendants to be used for religious purposes. Below is a picture of  
21 some of the alcohol TVH purchased with donated funds:



18. When TVH had after-hour visitors, he would summon Ms. Chau from her dorm room, and demand that she bring and serve the food for TVH and his guests. He would also require Ms. Chau to cook and serve him food into the late night. If she refused to cook and serve food, or he perceived was slow in her work, TVH would yell and chastise her. In other words, Ms. Chau was at TVH's beck and call on a 24/7 schedule.

19. While employed with Defendants, Ms. Chau was subjected to discrimination and harassment because of her gender and/or national origin. This includes but is not limited to, being harassed for being female, being required to act as TVH's personal maid, having her ability to leave the temple restricted, being harassed for requesting food to be delivered for her personal consumption, being harassed for requesting a day off, being harassed for requesting a sick day (and then forced to work while sick), being harassed whenever TVH perceived Ms. Chau was not performed her tasks quickly, and being harassed because Ms. Chau did not perform a task to TVH's liking. It was clear that TVH viewed Ms. Chau and other nuns as servants as indentured servants to perform secular tasks for no charge.

## TVH Sexually Assaults Ms. Chau

20. Utilizing his position of power and authority, TVH sexually assaulted and forcibly raped Ms. Chau on three separate occasions, with the most recent occurring in March 2024. On two occasions, TVH entered the nuns' dorm room area, which contains Ms. Chau's sleeping quarters, while Ms. Chau was alone. This dorm room area, which contains Ms. Chau's sleeping quarters, is restricted to only females. However, Defendants gave TVH the security code, which allowed him to enter the female dorm room area. As a result, Defendants rendered meaningless an important mechanism to protect Ms. Chau. During these attacks, TVH was very intoxicated. At no time did Ms. Chau ever provide consent to TVH. In fact, Ms. Chau attempted to fight back but was thwarted by TVH's weight and strength.

21. On another occasion, TVH entered Ms. Chau's dorm room area to sexual assault her. On this occasion, TVH was too inebriated from consuming alcohol to assault her. Instead, TVH demanded that Ms. Chau romantically hold his hand and embrace him. At no time did Ms. Chau provide consent for such romantic interactions and only complied due to the position of power TVH



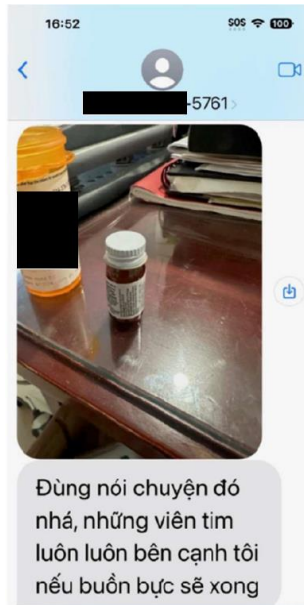
1 held and fear of punishment if she did not comply. When Ms. Chau attempted to leave, TVH held  
2 her hand tighter and pulled her in closer to him to prevent her from leaving. Due to TVH's inebriation,  
3 Ms. Chau was able to take a number of photographs showing his intoxication and her compliance  
4 with his demands. Some of those photographs are below:



14 **Ms. Chau Suffered Increased Harassment And Retaliation**

15 22. After the March 2024 sexual assault and rape, TVH increased his discriminatory and  
16 harassing behavior towards Ms. Chau. For example, he increasingly restricted her movements within  
17 the temple, and forbid her from leaving temple grounds. Upon information and belief, this was done  
18 intentionally to prevent Ms. Chau, who does not speak, read, or write in English, from reporting TVH.  
19 Moreover, TVH continued to yell and harass Ms. Chau simply for being female.

20 23. When Ms. Chau informed TVH that she was going to report him, TVH immediately  
21 began to yell and threaten Ms. Chau. Upon information and belief, TVH informed his brother TVL  
22 that he had sexually assaulted Ms. Chau and that she intended to go to the authorities. In response,  
23 TVH threatened to commit suicide through overdosing drugs. Below is one of the pictures (which  
24 has been redacted) TVH sent to Ms. Chau claiming that he would commit suicide if she reported him  
25 to the authorities:  
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24. Once TVH realized that Ms. Chau was not swayed by his claims that he would commit suicide, and in retaliation for engaging in this protected activity, TVH expelled Ms. Chau from the Dieu Ngu temple on or about September 22, 2024. TVH claimed that he was expelling Ms. Chau due to her being too rebellious, wasting too much water, and eating too many vegetables. Ms. Chau was forced to move to the Dieu Phap Temple.

25. Thereafter, Defendants began a campaign of coercing Ms. Chau to return to Vietnam so that she cannot report Defendants' illegal and improper conduct to authorities. Defendants basically decided to get rid of their problem by removing her completely from the United States. On September 27, 2024, TVL informed Ms. Chau that she needed to find another temple because he would no longer allow her to stay at Dieu Phap Temple. Ms. Chau immediately fell into a deep deprecation. On the night of September 29, 2024, Ms. Chau wandered the streets, intending to find a beach to end her life. She could not find a suitable location and eventually returned to the Dieu Phap Temple, physically and emotionally drained. On October 23, 2024, a senior member employed with Defendants told Ms. Chau that her R-1 visa was denied and that she needed to leave the United States immediately. This person advised Ms. Chau that if she did not leave immediately, the government would deport her. This person's statement contradicted a prior statement from a staff member on September 21, 2024 that Ms. Chau's R-1 visa was approved. Then on November 2, 2024, TVL expelled Ms. Chau from the Dieu Phap Temple, and proceeded to inform Ms. Chau that she was

1 required to leave the United States immediately because her R-1 visa was denied. TVL gave Ms.  
2 Chau a few dates as options for her to leave and bought her the flight for her departure. When Ms.  
3 Chau requested proof of the denial, TVL provided documents in English (which Ms. Chau could not  
4 read and was later revealed to not be a denial of her R-1 visa). Ms. Chau's R-1 visa was not rejected  
5 and so Defendants' claims were wrong. Upon information and belief TVL made this false  
6 representation to Ms. Chau to force her to leave the United States in order to prevent Ms. Chau from  
7 reporting the sexual assaults and employment violations. Upon information and belief, Defendants  
8 have furthered instructed the attorney who submitted Ms. Chau's visa application to refuse to provide  
9 Ms. Chau with any of her application documents to further hinder her ability to return to the United  
10 States.

11 26. The retaliation did not stop there. Upon information and belief, Defendants have made  
12 attempts to contact Ms. Chau's family to make further threats to Ms. Chau. In violation of 18 U.S.C.  
13 § 1512, Defendants and their agents have attempted to contact Ms. Chau and her family members to  
14 influence or prevent their testimony for Defendants' benefit.

15 **FIRST CAUSE OF ACTION**

16 **SEXUAL BATTERY**

17 **(Against Xuan Ngoc Ho)**

18 27. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

19 28. Cal. Civ. Code section 1708.5(a) provides: A person who commits a sexual battery  
20 who does any of the following: (1) acts with the intent to cause a harmful or offensive conduct with  
21 an intimate part of another, and a sexually offensive contact with that person directly or indirectly  
22 results. (2) Acts with the intent to cause a harmful or offensive contact with another by use of his or  
23 her intimate part, and a sexually offensive contact with that person directly or indirectly results. (3)  
24 Acts to cause an imminent apprehension of the conduct described in paragraph (1) or (2), and a  
25 sexually offensive conduct with that person directly or indirectly results.

26 29. Cal. Civ. Code section 1708.5(d) defines intimate part as the sexual organ, anus, groin,  
27 or buttocks of any person, or the breast of a female.

28 30. Cal. Civ. Code section 1708.5(f) defines offensive contact to mean contact that offends

1 a reasonable sense of personal dignity.

2 31. Ms. Chau alleges that TVH committed acts of civil sexual battery in violation of Cal.  
3 Civ. Code section 1708.5, when TVH willfully, maliciously, intentionally, and without the consent  
4 of Ms. Chau subjected her to the forceful, harmful, and/or offensive touching of Plaintiff's buttocks  
5 and vagina, including viciously raping her by way of vaginal penetration.

6 32. As a direct and proximate result of TVH's unlawful conduct as alleged hereinabove,  
7 Ms. Chau has suffered economic harm, loss of earnings, and other damages, all in an amount that  
8 exceeds the jurisdictional minimum of the Superior Court, in an amount to be proven at trial.

9 33. The aforementioned conduct by TVH was willful, wanton, and malicious. At all  
10 relevant times, TVH acted with conscious disregard of Ms. Chau's rights. TVH also acted with the  
11 knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or  
12 humiliation to Ms. Chau. Ms. Chau is further informed and believes that TVH intended to cause fear,  
13 physical injury, and/or pain and suffer to Ms. Chau. By virtue of the foregoing, Ms. Chau is entitled  
14 to recover punitive and exemplary damages from Defendants according to proof at trial.

15 **SECOND CAUSE OF ACTION**

16 **ASSAULT**

17 **(Against Xuan Ngoc Ho)**

18 34. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

19 35. TVH acted with the intent to cause harmful or offensive contact or threaten to touch  
20 Ms. Chau in a harmful or offensive manner as alleged above.

21 36. Ms. Chau reasonably believed that was about to be touched in a harmful or offensive  
22 manner.

23 37. Ms. Chau did not consent to TVH's conduct, and was harmed by TVH's conduct. It is  
24 clear that TVH's conduct was a substantial factor in causing Plaintiff's harm.

25 38. As a direct and proximate result, Ms. Chau suffered severe damages.

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1 **THIRD CAUSE OF ACTION**

2 **FALSE IMPRISONMENT (Cal. Lab. Code § 226(e))**

3 **(Against Xuan Ngoc Ho and DOES 1 to 10)**

4 39. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

5 40. Defendant TVH intentionally confined and/or restrained Ms. Chau against her will on  
6 multiple occasions for a measurable period of time.

7 41. The confinements were without legal justification or privilege.

8 42. As a direct and proximate result, Ms. Chau suffered severe damages.

9 **FOURTH CAUSE OF ACTION**

10 **VIOLATION OF THE RALPH ACT**

11 **(Against Xuan Ngoc Ho)**

12 43. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

13 44. TVH engaged in violent acts toward Ms. Chau because of her sex, gender, marital  
14 status, and/or sexual orientation.

15 45. Ms. Chau is informed and believes, and based thereon alleges, that Ms. Chau's sex,  
16 gender, marital status and/or sexual orientation was a substantial motivating factor in TVH's unlawful  
17 treatment of her, and had she not been single, heterosexual, and/or a woman, she would not have been  
18 assaulted and/or battered by TVH.

19 46. As a direct and proximate result of TVH's unlawful conduct, Ms. Chau was harmed  
20 and has suffered and continues to suffer general and special, economic and non-economic damages  
21 in an amount to be proven at trial.

22 47. The foregoing conduct of TVH was intended by TVH to cause injury to Ms. Chau or  
23 was despicable conduct carried on by TVH with a willful and conscious disregard of the rights of Ms.  
24 Chau and/or subjected Ms. Chau to cruel and unjust hardship in conscious disregard of Ms. Chau's  
25 right to be free from violence, interference by threats, intimidation, or coercion, or attempts to  
26 threaten violence or interfere by threats, intimidation, due to her sex and/or gender, such as to  
27 constitute malice, oppression, or fraud under California Civil Code section 3294, thereby entitling  
28

1 Ms. Chau to punitive damages in an amount appropriate to punish or make an example of TVH.

2 48. Pursuant to California Civil Code sections 52 and 52.1, Ms. Chau requests a  
3 reasonable award of penalties, and attorney's fees and costs, including expert fees.

4 **FIFTH CAUSE OF ACTION**

5 **GENDER VIOLENCE**

6 **(Against Xuan Ngoc Ho)**

7 49. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

8 50. TVH perpetrated acts of sexual battery and abuse that constitute a criminal offense  
9 under state law involving the use of physical force against Ms. Chau, committed against Ms. Chau's  
10 person because of her gender in violation of California Civil Code section 52.4.

11 51. Ms. Chau was sexually battered and abused because of her gender and was subjected  
12 to a physical intrusion and/or physical invasion of a sexual nature under coercive conditions.

13 52. Ms. Chau is informed and believes, and based thereon alleges, that her gender was a  
14 motivating factor in TVH's unlawful treatment of her and had she not been a woman, she would not  
15 have been battered and abused by TVH.

16 53. As a direct and proximate result of TVH's unlawful conduct, Ms. Chau has suffered  
17 and continues to suffer general and special, economic and non-economic damages in an amount to be  
18 proven at trial.

19 54. The foregoing conduct of TVH was intended by TVH to cause injury to Ms. Chau or  
20 was despicable conduct carried on by Reeder with a willful and conscious disregard of the rights of  
21 Ms. Chau or subjected Ms. Chau to cruel and unjust hardship in conscious disregard of Ms. Chau's  
22 right to be free from interference by violence, threats, intimidation, or coercion, or attempts to  
23 interfere by violence threats, intimidation, or coercion, due to her sex and/or gender, such as to  
24 constitute malice, oppression, or fraud under California Civil Code Section 3294, thereby entitling  
25 Ms. Chau to punitive damages in an amount appropriate to punish or make an example of TVH.

26 55. Pursuant to California Civil Code section 52.4, Ms. Chau requests a reasonable award  
27 of attorney's fees and costs, including expert fees.



1 **SIXTH CAUSE OF ACTION**

2 **HUMAN TRAFFICKING (Cal. Civil Code § 52.5)**

3 **(Against all Defendants and DOES 11 to 20)**

4 56. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

5 57. Defendants deprived Ms. Chau of her personal liberties by substantially restricting her  
6 movement. Ms. Chau was not allowed to leave the temple grounds. Ms. Chau was also not allowed  
7 to use any services outside of the temple. Defendants further forced Ms. Chau to work upwards of  
8 15-hour days, seven days per week, cleaning, cooking, performing administrative work, performing  
9 yard work and other manual labor at their offices and temple grounds. Once Ms. Chau completed  
10 her assigned tasks for the day, Ms. Chau was required to stay in the female dorm area for the rest of  
11 the evening. The only times Ms. Chau left the temple grounds was with a driver appointed by  
12 Defendants. In those instances, Ms. Chau was driven only to Dieu Phap Buddhist Temple from Dieu  
13 Ngu Buddhist Temple or vice versa. As a result, Defendants were always watching Ms. Chau.

14 58. When Ms. Chau asked permission to leave the temple grounds, to obtain services  
15 outside of the temple, or not be required to provide labor that day, Defendants would deny her request  
16 and restrict her movement through force, fear, fraud, coercion, duress, menace and threat.  
17 Defendants' conduct in controlling Ms. Chau included not allowing Ms. Chau to have control over  
18 her worker immigration documents. Even to the present date, when Ms. Chau requested from  
19 Defendants her complete immigration file, Defendants refused to provide her with her complete  
20 immigration file and claim that the files belong to them.

21 59. Under the circumstances, Ms. Chau reasonably believed that it is likely that  
22 Defendants would carry out their threats towards her given the position power Defendants held over  
23 Ms. Chau and their stature within the Buddhist religion.

24 60. Defendants acted with the intent to obtain forced labor or services from Ms. Chau,  
25 which Defendants obtained through force, fraud, duress or coercion. Through their conduct,  
26 Defendants forced Ms. Chau to work upwards of 15-hour days, seven days per week, cleaning,  
27 cooking, performing administrative work, performing yard work and other manual labor at their  
28 offices and temple grounds. TVH also forced Ms. Chau to have sexual contact with him against her

1 will.

2 61. As a direct and proximate result of these actions, Ms. Chau suffered severe damages.

3 **SEVENTH CAUSE OF ACTION**

4 **AIDING AND ABETTING**

5 **(Against all Defendants and DOES 21 to 30)**

6 62. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

7 63. Defendants had knowledge of TVH's tortious conduct as alleged above, or through  
8 his position and relationship, should have known.

9 64. Defendants substantially assisted or encouraged these acts, including by sponsoring  
10 Plaintiff's visa which deepened her dependency allowing her continued residency at the temple  
11 despite the abuses, having people constantly monitoring her movement, restricting her movement,  
12 paying Ms. Chau less than her minimum wage to increase her dependency on Defendants for her  
13 subsistence, allowing TVH to have access to the women's only quarters, claiming that her R-1 visa  
14 was denied, later expelling Ms. Chau from both temples when her allegations became known as a  
15 means of quieting her, withholding Ms. Chau's immigration files from her, and intimidating Ms.  
16 Chau's colleagues and family when Ms. Chau brought her claims in violation of Cal. Penal Code §  
17 136.1 and 18 U.S.C. § 1512.

18 65. As a direct and proximate result, Ms. Chau suffered severe damages.

19 **EIGHTH CAUSE OF ACTION**

20 **NEGLIGENT SUPERVISION / PREMISES LIABILITY**

21 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
22 **Buddhist Cultural Heritage Organization)**

23 66. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

24 67. Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and  
25 International Buddhist Cultural Heritage Organization owed a duty of care to Plaintiff as a resident  
26 on their premises to provide a safe environment free from sexual assault and harassment.

27 68. These Defendants breached this duty by failing to adequately supervise their leaders,  
28 particularly Defendant TVH and Defendant TVL, and their premises; by failing to implement and

1 enforce policies to prevent sexual misconduct; and by failing to address or investigate the abuses  
2 when they occurred or became known.

3 69. Additionally, despite Ms. Chau's dorm area being restricted to only females, TVH was  
4 given complete access to the dorm area, which allowed him to enter the area and assault Ms. Chau.  
5 Video cameras are installed around the premises and on the stairs leading to the female dorm area.  
6 The cameras should have caught TVH's entries into the female dorm area late at night. Defendants  
7 Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural  
8 Heritage Organization should have known that TVH was improperly entering the female dorm area  
9 while intoxicated and did nothing to prevent him from doing so.

10 70. As a direct and proximate result of this negligence, Ms. Chau suffered severe damages.

### 11 **NINTH CAUSE OF ACTION**

#### 12 **HARASSMENT**

#### 13 **(Against All Defendants and DOES 31 to 40)**

14 71. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

15 72. The FEHA provides that it is unlawful for an employer to harass an employee because  
16 of, *inter alia*, the employee's gender.

17 73. In addition, under the FEHA, the employer itself is strictly liable for workplace  
18 harassment by a supervisor. The employer is liable for all acts of sexual harassment by a supervisor,  
19 even unwanted touching. Harassment by a supervisor is unlawful regardless of whether the employer  
20 knows or should have known and fails to intervene.

21 74. Ms. Chau was a female employee of Dieu Ngu Buddhist Temple, Dieu Phap Buddhist  
22 Temple, and International Buddhist Cultural Heritage Organization at all times relevant.

23 75. Here, TVH and TVL were Ms. Chau's supervisors, as defined by the FEHA, and as  
24 demonstrated through the facts alleged above. TVH and TVL harassed Ms. Chau on multiple  
25 occasions, including, but not limited to, subjecting her to gender harassment, restricting her  
26 movements within and outside of the temples, failing to pay Ms. Chau the minimum wage, failing to  
27 provide Ms. Chau with meal and/or rest break periods, refusing to allow Ms. Chau to take sick days,  
28 failing to pay Ms. Chau the minimum wage, failing to pay Ms. Chau overtime wages, requiring Ms.

Chau to work on call for Defendant TVH, and for threatening Ms. Chau's immigration status.

76. Under the FEHA, which imposes strict liability on the employer, Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural Heritage Organization are liable for all acts of sexual harassment by TVH or TVL.

77. Defendants' conduct was a substantial factor in causing Ms. Chau's harm.

78. As a direct and proximate result of conduct of Defendants, Ms. Chau has suffered and will continue to suffer emotional and physical distress and injury, humiliation, anxiety, loss of earnings, and other employment benefits and job opportunities in an amount to be determined at trial.

79. Defendants' actions were so cold, callous and reckless as to be malicious. Therefore, Ms. Chau is entitled to an award of punitive damages in an amount to be determined at trial.

#### **TENTH CAUSE OF ACTION**

#### **RETALIATION IN VIOLATION OF THE FEHA**

**(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International Buddhist Cultural Heritage Foundation)**

80. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

81. Cal. Government Code § 12940(h) provides that it is unlawful for any employer or person to discriminate against any person because the person has opposed any practices forbidden under the Fair Employment and Housing Act, or because the person has filed a complaint. Cal. Government Code § 12940, *et seq.*

82. Here, Ms. Chau's opposed TVH's and TVL's unlawful conduct at the time of the sexual assault, and by informing TVH and TVL that she would report the sexual assault to the authorities. Thereafter, Ms. Chau was subjected to retaliation, including but not limited to, expulsion from both of the temples, increased harassment, increased restrictions on her ability to move freely inside and outside of the temple, and threats made against her immigration status. Defendants made false representations regarding her immigration status in order to force her to leave the United States.

83. There is therefore a causal link between Ms. Chau's complaints about the rape, harassment, and discrimination and the adverse employment actions she suffered.

84. In so retaliating against Ms. Chau, Defendants violated the Fair Employment and

1 Housing Act.

2 85. As a direct and proximate result of conduct of Defendants, Ms. Chau has suffered and  
3 will continue to suffer emotional and physical distress and injury, humiliation, anxiety, loss of  
4 earnings, and other employment benefits and job opportunities in an amount to be determined at trial.  
5 As a proximate result of Defendants' acts, Ms. Chau has suffered damages in an amount according  
6 to proof.

7 86. These actions of Defendants were cold, callous and reckless as to be malicious. Ms.  
8 Chau is therefore entitled to an award of punitive damages in an amount to be determined at trial.

9 **ELEVENTH CAUSE OF ACTION**

10 **RETALIATION IN VIOLATION OF CAL. LAB. CODE SECTION 1102.5**

11 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
12 **Buddhist Cultural Heritage Foundation)**

13 87. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

14 88. Cal. Lab. Code § 1102.5 provides that it is unlawful for an employer or person to  
15 retaliate against an employee who provides information to a public body conducting an investigation.

16 89. Here, Defendants were aware that Ms. Chau was intending to disclose information to  
17 the authorities that she had been sexually assaulted and raped by TVH. Upon information and belief,  
18 Defendants were also concerned that an investigation would also reveal that Defendants had  
19 committed multiple labor code violations such as their failure to pay minimum wage, failure to pay  
20 overtime, failure to issue itemized wage statements, failure to provide wages upon termination.

21 90. There is a causal link between Ms. Chau's complaint about the rape, and her expulsion  
22 from the temples and ultimate termination of her employment.

23 91. As a direct and proximate result of conduct of Mercer, Ms. Chau has suffered and will  
24 continue to suffer emotional and physical distress and injury, humiliation, anxiety, loss of earnings,  
25 and other employment benefits and job opportunities in an amount to be determined at trial. As a  
26 proximate result of Defendants' acts, Ms. Chau has suffered damages in an amount according to  
27 proof.

28 92. These actions of Defendants were cold, callous and reckless as to be malicious. Ms.

1 Chau is therefore entitled to an award of punitive damages in an amount to be determined at trial.

2 **TWELFTH CAUSE OF ACTION**

3 **FAILURE TO PREVENT DISCRIMINATION, HARASSMENT, AND RETALIATION**  
4 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
5 **Buddhist Cultural Heritage Foundation)**

6 93. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

7 94. At all relevant times, Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist  
8 Temple, and International Buddhist Cultural Heritage Foundation were required, but failed, to take  
9 all reasonable steps necessary to prevent discrimination and harassment under Government Code  
10 section 12940(k), *et seq.*, as well as retaliation.

11 95. Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and  
12 International Buddhist Cultural Heritage Foundation knew or should have known about TVH's and  
13 TVL's harassing behavior, as well as TVH's sexual assault and rape of Plaintiff, but failed to take  
14 adequate steps to prevent them from harassing other employees. In addition, Defendants Dieu Ngu  
15 Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural Heritage  
16 Foundation significant delay in investigating TVH's and/or TVL's discriminatory, harassing, and  
17 retaliatory behavior constituted failure to prevent discrimination under the FEHA. Neither TVH nor  
18 TVL were not placed on an immediate leave, nor was an investigation commenced.

19 96. As a direct and proximate result of Defendants Dieu Ngu Buddhist Temple, Dieu Phap  
20 Buddhist Temple, and International Buddhist Cultural Heritage Foundation's failure to take all  
21 reasonable steps necessary to prevent discrimination, harassment, and retaliation, Ms. Chau has  
22 suffered and will continue to suffer severe mental anguish and emotional and physical distress and  
23 injury, humiliation, anxiety, loss of earnings, and other employment benefits and job opportunities in  
24 an amount to be determined at trial.

25 97. Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and  
26 International Buddhist Cultural Heritage Foundation's actions were so cold, callous, and reckless as  
27 to be malicious. Therefore, Ms. Chau is entitled to an award of punitive damages in an amount to be  
28 determined at trial.



1 **THIRTEENTH CAUSE OF ACTION**

2 **WRONGFUL TERMINATION**

3 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
4 **Buddhist Cultural Heritage Foundation)**

5 98. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

6 99. An employer-employee relationship existed between Ms. Chau and Defendants Dieu  
7 Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural Heritage  
8 Foundation.

9 100. Through the actions of Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist  
10 Temple, and International Buddhist Cultural Heritage Foundation, Ms. Chau was terminated.

11 101. The termination of Ms. Chau by Defendants Dieu Ngu Buddhist Temple, Dieu Phap  
12 Buddhist Temple, and International Buddhist Cultural Heritage Foundation was in direct violation  
13 of public policy.

14 102. Ms. Chau had a good-faith belief that the actions in the preceding paragraph, which  
15 she complained about in the context of her employment, were unlawful.

16 103. Ms. Chau's engagement in protected activity under the FEHA and California Labor  
17 Code section 1102.5 was a proximate cause of Ms. Chau's termination

18 104. Ms. Chau suffered damages as a result of having been terminated in violation of public  
19 policy, including lost wages, lost opportunities, expenses, and other damages, in an amount to be  
20 determined at trial.

21 105. These actions of Defendants were so cold, callous, and reckless as to be malicious.  
22 Plaintiff is therefore entitled to an award of punitive damages in an amount to be determined at trial.

23 **FOURTEENTH CAUSE OF ACTION**

24 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

25 **(Against All Defendants and DOES 41 to 50)**

26 106. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

27 107. As discussed herein, Defendants, and each of them, intentionally and recklessly  
28 caused severe emotion distress to Ms. Chau in multiple ways.

108. TVH intentionally and recklessly caused severe emotional distress to Ms. Chau by sexually assault and raping her on multiple occasions, coercing Ms. Chau to perform romantic acts with him, directing numerous sexually harassing comments towards Ms. Chau, by restricting Ms. Chau's ability to move within and outside of the temples, by harassing Ms. Chau because of her gender and/or national origin, by refusing to allow her to take sick days, by refusing to pay Ms. Chau in accordance with California law (minimum wage, overtime, sick days, etc.), and by terminating her employment after she engaged in protected activity. TVL intentionally and recklessly caused severe emotional distress to Ms. Chau after he retaliated against her after she engaged in protected activity. This includes but is not limited to, harassing Ms. Chau because she represented she wanted to go to the authorities, lying about her visa, and preventing Ms. Chau from obtaining documents related to her visa. The Defendants were aware of TVH's and TVL's actions but took no action to stop them, let alone investigate the matter.

109. Defendants' conduct, as discussed herein, was so outrageous that it caused humiliation, shame, shock, anxiety, and severe emotional distress to Ms. Chau. Defendants' eventual termination of Ms. Chau only exacerbated Plaintiff's emotional distress.

110. Defendants intended to cause Ms. Chau emotional distress, or acted with reckless disregard of the probability that Ms. Chau would suffer emotional distress.

111. Defendants' conduct was a substantial factor in causing Ms. Chau's severe emotional distress and related damage.

## FIFTEENTH CAUSE OF ACTION

## NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

**(Against All Defendants and DOES 51 to 60)**

112. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

113. As discussed herein, in the alternative, Defendants, and each of them, negligently and recklessly caused severe emotion distress to Ms. Chau in multiple ways.

114. TVH negligently and recklessly caused severe emotional distress to Ms. Chau by sexually assault and raping her on multiple occasions, directing numerous sexually harassing comments to Ms. Chau, by restricting Ms. Chau's ability to move within and outside of the temples,

1 by harassing Ms. Chau because of her gender and/or national origin, by refusing to allow her to take  
2 sick days, by refusing to pay Ms. Chau in accordance with California law (minimum wage, overtime,  
3 sick days, etc.), and by terminating her employment after she engaged in protected activity. TVL  
4 negligently and recklessly caused severe emotional distress to Ms. Chau after he retaliated against  
5 her after she engaged in protected activity. This includes but is not limited to, harassing Ms. Chau  
6 because she represented she wanted to go to the authorities, lying about her visa, and preventing Ms.  
7 Chau from obtaining documents related to her visa. The Defendants were aware of TVH's and TVL's  
8 actions but took no actions to stop them, let alone investigate the matter.

9 115. Defendants' conduct, as discussed herein, was so outrageous that it caused  
10 humiliation, shame, shock, anxiety, and severe emotional distress to Ms. Chau. Ms. Chau's eventual  
11 termination of Plaintiff only exacerbated Plaintiff's emotional distress.

12 116. In the alternative, Defendants negligently caused Ms. Chau emotional distress, or  
13 acted with reckless disregard of the probability that Ms. Chau would suffer emotional distress.

14 117. Defendants' conduct was a substantial factor in causing Ms. Chau's severe emotional  
15 distress and related damages.

16 **SIXTEENTH CAUSE OF ACTION**

17 **FAILURE TO PAY MINIMUM WAGE**

18 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
19 **Buddhist Cultural Heritage Foundation and DOES 61 to 70)**

20 118. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

21 119. Ms. Chau was employed by Defendants Dieu Ngu Buddhist Temple, Dieu Phap  
22 Buddhist Temple, and International Buddhist Cultural Heritage Foundation. Although Ms. Chau  
23 regularly worked over eight hours in a single day, and worked seven days a week, Ms. Chau was only  
24 paid, at maximum, \$400 in a month.

25 120. California Labor Code §§ 1194, 1197, 1197.1 and Wage Order 5 entitle non-exempt  
26 employees to an amount equal to or greater than the minimum wage for all hours worked. All hours  
27 must be paid at the statutory or agreed rate and no part of this rate may be used as a credit against a  
28 minimum wage obligation.

1 121. Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and  
2 International Buddhist Cultural Heritage Foundation failed to pay Ms. Chau at the rate of the  
3 minimum wage.

4 122. As a result of these violations, Defendants Dieu Ngu Buddhist Temple, Dieu Phap  
5 Buddhist Temple, and International Buddhist Cultural Heritage Foundation are liable for unpaid  
6 minimum wages, liquidated damages, and attorneys' fees and costs.

7 **SEVENTEENTH CAUSE OF ACTION**

8 **FAILURE TO PAY OVERTIME**

9 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
10 **Buddhist Cultural Heritage Foundation and DOES 71 to 80)**

11 123. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

12 124. California Labor Code §§ 510, 558, and Wage Order 5 entitle non-exempt employees  
13 to overtime premiums for hours worked in excess of eight (8) in a given day, forty (40) in a given  
14 workweek, or on the seventh day worked in a single workweek. All hours must be paid at the statutory  
15 or agreed rate and no part of this rate may be used as a credit against a minimum wage obligation.

16 125. Ms. Chau regularly worked in excess of eight (8) hours in a single day and over forty  
17 (40) hours in a single week given that she worked every single day of the week. Defendants Dieu  
18 Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural Heritage  
19 Foundation failed to pay Ms. Chau any of her overtime wages.

20 **EIGHTEENTH CAUSE OF ACTION**

21 **FAILURE TO PROVIDE ACCURATE AND ITEMIZED WAGE STATEMENT**

22 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
23 **Buddhist Cultural Heritage Foundation and DOES 81 to 90)**

24 126. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein

25 127. Cal. Lab. Code § 226(e) provides that, an employee is entitled to recover the greater  
26 of actual damages or \$50 for the initial pay period when the wage statement violation occurs, and  
27 \$100 for each violation in a subsequent pay period, subject to a maximum aggregate penalty of \$4,000  
28 per employee, plus an award of attorneys' fees and costs.

128. Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural Heritage Foundation did not provide itemized wage statements at any time during Ms. Chau's employment.

129. Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, and International Buddhist Cultural Heritage Foundation's violation Cal. Lab. Code § 226(e) by failing to provide Ms. Chau with accurate and itemized wage statements, entitles her to recover those damages. Ms. Chau is also entitled to recover interest, reasonable attorneys' fees, and costs of suit under Cal. Lab. Code § 226(e)(1).

130. Ms. Chau seeks recovery of his damages, plus interest, reasonable attorneys' fees, and costs of suit to the extent permitted by Cal. Lab. Code § 226(e).

**NINETEENTH CAUSE OF ACTION**

**FAILURE TO PAY WAGES UPON TERMINATION**

**(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International Buddhist Cultural Heritage Foundation and DOES 91 to 100)**

131. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

132. Cal. Labor Code § 201 provides that, when an employee is discharged, all of their earned wages are due at the time of termination.

133. Ms. Chau was not paid her wages when she was terminated from employment at the Dieu Ngu Temple or the Dieu Phap Temple. Pursuant to Cal. Labor Code §§ 201 and 203, Ms. Chau is entitled to statutory waiting time penalties equivalent to 30 working days at Mr. Garg's daily rate of compensation, which includes all aggregate wages.

134. Ms. Chau seeks recovery of her unpaid wages, unpaid expenses, and statutory waiting time penalties of her daily wage multiplied by 30 days, plus interest, reasonable attorneys' fees, and costs of suit to the extent permitted by Cal. Lab. Code §§ 202 and 203.

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1 **TWENTIETH CAUSE OF ACTION**

2 **UNFAIR BUSINESS PRACTICES**

3 **(Against Defendants Dieu Ngu Buddhist Temple, Dieu Phap Buddhist Temple, International**  
4 **Buddhist Cultural Heritage Foundation and DOES 101 to 110)**

5 135. Ms. Chau incorporates each of the above paragraphs, as if set forth fully herein.

6 136. California Business and Professions Code §§ 17200 et seq. (also referred to herein as  
7 the “Unfair Business Practices Act,” “Unfair Competition Law,” or “UCL”), prohibits unfair  
8 competition in the form of any unlawful, unfair, or fraudulent business acts or practices.

9 137. California Business and Professions Code § 17204 allows a person injured by the  
10 unfair business acts or practices to prosecute a civil action for violation of the UCL.

11 138. Defendants committed acts of unfair competition as defined by the Unfair Business  
12 Practices Act, by engaging in the unlawful, unfair and fraudulent business acts and practices described  
13 above in this complaint, including, but not limited to the sexual assault and rape that she was subjected  
14 to by Defendant TVH, the failure of Defendants to justly and rightly pay Ms. Chau her unpaid wages,  
15 and by the discrimination, harassment, and retaliation that she was subjected to while employed.

16 139. The violations of these laws and regulations, as well as of the fundamental California  
17 public policies underlying them, serve as unlawful predicate acts and practices for the purposes of  
18 Business and Professions Code §§ 17200, *et seq.*

19 140. The acts and practices alleged above have unlawfully deprived Plaintiff of the rights  
20 due to him under the law while enabling Defendants to gain an unfair competitive advantage over  
21 law-abiding employers and competitors.

22 141. As a direct and proximate result of the aforementioned acts and practices, Plaintiff has  
23 suffered a loss of wages and property that he should have received as an employee of Hera Systems.

24 142. Ms. Chau seeks an order of this Court awarding restitution, injunctive relief, and all  
25 other legal and equitable relief allowed under Business & Professions Code § 17200 et seq., plus  
26 interest, attorneys' fees and costs pursuant to, *inter alia*, Code of Civil Procedure § 1021.5.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Ms. Chau respectfully prays for relief and judgment against Defendants as



1 follows, in amounts according to proof:

- 2 1. For judgment in favor of Plaintiff against Defendants;
- 3 2. For general and compensatory damages in an amount according to proof;
- 4 3. For punitive and exemplary damages in an amount to be determined at trial;
- 5 4. For treble damages under Cal. Civil Code § 52.5;
- 6 5. For Restitution;
- 7 6. For an injunction against Defendants;
- 8 7. For interest;
- 9 8. For attorney fees;
- 10 9. For costs of suit incurred herein; and
- 11 10. For such other and further relief as the Court deems just and proper.

12 Respectfully submitted,

13 Date: August 12, 2025

Respectfully Submitted,

14 **DHILLON LAW GROUP INC.**

15  
16 By: /s/ Brandon Q. Tran

17 J.P. DEOL  
18 BRANDON Q. TRAN  
19 MICHAEL FLEMING  
20 Attorney for Plaintiff  
Huong Chau

21 **TIGER TTFLAWYERS**

22  
23 By: /s/ Tiger Hoang Huy Tu

24 (TIGER) HOANG HUY TU  
25 Attorney for Plaintiff  
26 Huong Chau  
27  
28

1 **DEMAND FOR JURY TRIAL**

2 Plaintiff demands a trial by jury for all claims.

3 Date: August 12, 2025

Respectfully Submitted,

4 **DHILLON LAW GROUP INC.**

5  
6 By: /s/ Brandon Q. Tran

7 J.P. DEOL  
8 BRANDON Q. TRAN  
9 MICHAEL FLEMING  
Attorney for Plaintiff  
Huong Chau

10 **TIGER TTFLAWYERS**

11  
12 By: /s/ Tiger Hoang Huy Tu

13 (TIGER) HOANG HUY TU  
14 Attorney for Plaintiff  
15 Huong Chau

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