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STEVEN M. CHIZEN, State Bar No. 329160
CHIZEN LAW, PROFESSIONAL CORPORATION
5111 Telegraph Avenue, Suite 301
Oakland, CA 94609
Telephone: (510) 545-9556
Email: steven.chizen@chizenlaw.com

Attorney for Plaintiff Steven Fallon

SUMMONS ISSUED

Per local Rule, This case is assigned to Judge Weil, Edward G, for all purposes.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF CONTRA COSTA

STEVEN FALLON,

Plaintiff,

v.

SUMMIT BUILDING SERVICES, INC.; and **DOES** 1 through 20, inclusive,

Defendants.

CASE NO.: C25-03633

Unlimited Jurisdiction

COMPLAINT FOR:

1) **FEHA DISABILITY DISCRIMINATION**
2) **FEHA FAILURE TO PREVENT DISCRIMINATION AND RETALIATION**
3) **FAILURE TO MAKE A REASONABLE ACCOMODATION**
4) **FAILURE TO ENGAGE IN A GOOD FAITH INTERACTIVE PROCESS**
5) **FEHA RETALIATION**
6) **CFRA INTERFERENCE**
7) **CFRA RETALIATION**
8) **FAILURE TO REIMBURSE EXPENSES**
9) **WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY**

JURY TRIAL DEMANDED

Processed by Court on 12/15/2025 2:45 PM

Plaintiff **STEVEN FALLON** brings this action, by and through counsel, for damages against Defendant **SUMMIT BUILDING SERVICES, INC.**, and **DOES** 1 through 20, inclusive (collectively, "SBS" or "Defendants"), and each of them. Plaintiff hereby complains of Defendants, and/or each of them, named hereinabove as follows:

JURISDICTION AND VENUE

1. Jurisdiction is proper because Mr. Fallon worked for SBS in the State of California, County of Contra Costa, and Defendants committed all or nearly all the unlawful conduct, including the wrongful termination, in the State of California, County of Contra Costa. Significant relief is being sought against Defendants whose violations of California employment laws form a significant basis for Mr. Fallon's claims.

2. Venue is proper because Mr. Fallon primarily performed work for Defendants in the County of Contra Costa and a substantial portion of the transactions and occurrences related to this action occurred in this County, including, without limitation, the wrongful discharge of Mr. Fallon. Civ. Proc. Code § 395. Had unlawful conduct, including wrongful termination, not occurred, Mr. Fallon would still be working for SBS in the County of Contra Costa.

3. Prior to the filing of this action, Mr. Fallon exhausted his administrative remedies. He filed his complaint with the California Civil Rights Department ("CRD") alleging that the acts of Defendants constituted multiple violations of California's Fair Employment and Housing Act ("FEHA") and the California Family Rights Act ("CFRA"), among other things, and obtained a "right to sue" letter from CRD against Defendants on or around December 8, 2025. He subsequently brought this action on a timely basis.

PARTIES

4. Plaintiff **Steven Fallon** is a natural person who, at all times relevant to this claim, was employed in Contra Costa County.

5. Mr. Fallon is informed and believes, and thereon alleges, that Defendant **Summit Building Services, Inc.** (SBS) is, and at all times relevant to this claim, was, a California stock corporation doing business in Contra Costa County, with its registered

California address of 1128 Willow Pass Court, Concord, CA 94520. SBS is a professional cleaning company.

6. The true names and capacities, whether individual, corporate, associate or otherwise of Defendants DOES 1 through DOES 20, inclusive, are unknown to Mr. Fallon who therefore sues said Defendants by such fictious names pursuant to Code of Civil Procedure section 474. Mr. Fallon further alleges that each of the said fictitious Defendants is in some manner responsible for the acts and occurrences hereinafter set forth. Mr. Fallon will amend this Complaint to show their true names and capacities when the same are ascertained, as well as the manner in which each fictitious Defendant is responsible.

FACTS

7. Mr. Fallon started working at SBS on or about November 20, 2022, as Chief Operations Officer ("COO").

8. SBS provides commercial janitorial and other facility services across the San Francisco Bay Area and is based in Contra Costa County.

9. Mr. Fallon performed his job well, receiving positive reviews and comments from his supervisor, Matt Colchico, Chief Executive Officer ("CEO").

10. On or about May 24, 2024, Mr. Fallon sustained a serious injury when a strong gust of wind slammed an entrance door with a faulty regulator into Mr. Fallon as he was entering SBS.

11. The door pushed Mr. Fallon into the door frame, crushing Mr. Fallon's shoulder.

12. Mr. Fallon's injuries included a complete tear of his rotator cuff on his left shoulder, tendon tears in his upper left arm, and damage to his hips. He required surgery as part of his treatment. SBS was aware of the newfound disability/medical condition.

13. Around the last week of May or early June 2024, Mr. Fallon told Mr. Colchico that he intended to file a workers' compensation claim because the pain from the injury was not improving.

14. Mr. Colchico pressured Mr. Fallon not to file a worker's compensation claim.

15. Mr. Colchico told Mr. Fallon that he was "*being selfish*" for wanting to file a workers' compensation claim.

16. Mr. Colchico said to Mr. Fallon that he "*needed to think of the team and keep our workers' compensation costs down.*"

17. Shortly thereafter, Mr. Fallon reported to Marisa Beetz, Summit's HR Manager, that Mr. Colchico pressured him not to file a workers' compensation claim, therefore discriminating against him because of his newfound disability. He also told employees Heather Souza and Brian Pergamit.

18. On or about June 6, 2024, Mr. Fallon filed his workers' compensation claim anyway, which further infuriated Mr. Colchico.

19. After Mr. Fallon sustained his injury, Mr. Colchico discriminated against Mr. Fallon based on his disability.

20. For the first time since Mr. Fallon joined SBS, Mr. Colchico suddenly buried Mr. Fallon in administrative tasks that were time-consuming and nonsensical.

21. Mr. Colchico sent Mr. Fallon an influx of corrective emails, a dozen emails at once, and some emails were sent late in the evening and during weekends, outside of his working hours. This rarely and/or never occurred prior to Mr. Fallon's newfound disability.

22. The emails also included phrases such as *"as previously discussed," "as you've been onboarded with,"* and *"as you've agreed to"* to infer that Mr. Fallon chronically failed to do certain tasks. Again, this language was never used prior to Mr. Fallon's newfound disability.

23. Mr. Colchico began to highlight emails in yellow and used red, bold fonts all over his correspondence, which Mr. Colchico did not do before Mr. Fallon's injury.

24. Mr. Colchico embarrassed Mr. Fallon in front of his subordinates during meetings and through messaging on Teams chats, which Mr. Colchico did not do before Mr. Fallon's injury.

25. Mr. Colchico berated Mr. Fallon during their biweekly meetings and assigned Mr. Fallon 25-30 action items to complete when Mr. Fallon was normally assigned 2-3 action items prior to his disability.

26. Mr. Colchico began to monitor all of Mr. Fallon's meetings with his subordinates, which Mr. Colchico had never done before Mr. Fallon's injury.

27. On or about July 22, 2024, on the advice of his doctor, Mr. Fallon took a medical leave of absence protected by the CFRA for two weeks due to stress caused by Mr. Colchico's discrimination.

28. After his two-week medical leave, Mr. Fallon returned to an even more hostile work environment in retaliation.

29. Mr. Colchico suddenly required a "third party in the room" for any conversation between Mr. Colchico and Mr. Fallon.

30. SBS required Mr. Fallon to complete a daily "wellness check-in." The check-in questionnaire was a full page long and included questions such as "how are you feeling," "would you be able to work a full day," "would you need any accommodations," "would you be able to perform my duties," and so on.

31. The check-ins were not intended to learn about Mr. Fallon's health or feelings. Rather, SBS intended the check-ins to harass Mr. Fallon.

32. SBS did not require any other employee to complete a daily wellness questionnaire, even those with disabilities.

33. On or about August 7, 2024, Mr. Fallon's doctor placed him on a thirty-day medical leave due to anxiety and stress caused by SBS's treatment.

34. Two days later, SBS suspended Mr. Fallon's business email account.

35. On or about August 23, 2024, Mr. Fallon received an email from SBS requesting medical documentation during his medical leave.

36. SBS informed Mr. Fallon that he would be terminated if SBS did not receive the medical documentation on or about August 30, 2024.

37. On or about August 24, 2024, Mr. Fallon emailed Mr. Colchico and Ms. Beetz the requested medical documentation. SBS did not confirm receipt of his documentation.

38. On or about August 30, 2024, Mr. Fallon again delivered his medical documentation to SBS.

39. On or about August 31, 2024, Mr. Colchico called, texted, and emailed Mr. Fallon to turn in his company car.

40. This was the Saturday of Labor Day weekend, outside of his normal working hours.

41. Mr. Colchico instructed Mr. Fallon to clean the vehicle, take pictures of the vehicle, and park it on the street in front of his home to allow an overnight courier to pick up the vehicle.

42. In fall 2024, Mr. Fallon went out on another disability due to his shoulder and/or stress, which was protected by the CFRA.

43. On or about October 22, 2024, Mr. Fallon filed another complaint in writing to Ms. Beetz to address the disability related discrimination, harassment, and retaliation for taking CFRA leave.

44. Ms. Beetz had asked Mr. Fallon to put his complaints in writing to schedule a sit-down away from the office. This meeting never occurred.

45. SBS also retained a law firm to conduct an investigation but has not yet provided Mr. Fallon with the investigation report.

46. SBS's investigator and HR personnel reached out to Mr. Fallon numerous times during his protected CFRA leave requesting his assistance, thereby interfering with his protected leave.

47. Mr. Fallon's prior counsel sent a litigation hold notice on or about December 20, 2025 that further complained about unlawful employment actions under FEHA and the CFRA, among other things, but this only led to further retaliation by SBS.

48. On or about January 24, 2025, SBS wrongfully terminated Mr. Fallon while he was out on medical leave.

49. Oddly, SBS mischaracterized Mr. Fallon's termination as "voluntary."

50. SBS failed to engage in any interactive process when the CFRA leave ended to determine if reasonable accommodations could be made.

51. In fact, when Mr. Fallon's protected leave ended, Defendants did not reach out to him whatsoever other than to tell him that he was fired.

52. SBS never provided any reasonable accommodation for Mr. Fallon's disability.

53. SBS's actions against Mr. Fallon caused, and continue to cause, Mr. Fallon to suffer both economic damage and significant emotional distress.

54. Mr. Fallon remains unemployed.

FIRST CAUSE OF ACTION

FEHA Disability Discrimination

(Against all Defendants)

55. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

56. Mr. Fallon was an employee of SBS.

57. FEHA prohibits discrimination based on disability/medical conditions. Gov. Code § 12940(a).

58. Mr. Fallon informed SBS of his shoulder/arm injury and later his mental health disability/medical condition.

59. As more fully set forth above, Defendants discriminated against Mr. Fallon based on his disability and/or medical condition when they, among other things, fabricated performance issues, created extra and lower value work for him, rescinded his company car, and terminated his employment because of his medical condition/disability.

60. Employees without medical conditions and/or disabilities were not treated in this manner.

61. Mr. Fallon was therefore subjected to adverse employment actions because of and/or substantially motivated by his disability/medical condition.

62. Defendants, SBS, are employers within the meaning of FEHA.

63. Mr. Fallon was harmed.

64. The discrimination was a substantial factor in causing Mr. Fallon's harm.

65. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

66. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

SECOND CAUSE OF ACTION

FEHA Failure to Prevent Discrimination and Retaliation

(Against all Defendants)

67. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

68. Mr. Fallon was an employee of SBS.

69. Defendants, SBS, are employers within the meaning of FEHA.

70. FEHA provides in pertinent part that employers must take all reasonable steps to prevent discrimination and retaliation. Gov. Code § 12940(k).

71. The actions and conduct of Defendants, as alleged hereinabove, constitute failure to prevent discrimination and retaliation, in violation of FEHA.

72. For example, Defendants failed to prevent Mr. Colchico from treating Mr. Fallon differently, and worse, because of his medical condition and/or disability when SBS terminated him based on that reason.

73. For example, Defendants failed to stop or do anything about the retaliation carried out by Mr. Colchico and others when Mr. Fallon made complaints about the discrimination and retaliation that was occurring.

74. Defendants had inadequate policies and procedures in place to prevent discrimination and retaliation and stop discrimination and retaliation.

75. Senior SBS leaders (CEO) were aware of discrimination and retaliation but carried it out anyways without taking any corrective actions.

76. There were inadequate remedial actions.

77. Mr. Fallon was harmed.

78. The failure to prevent discrimination and retaliation was a substantial factor in causing Mr. Fallon harm.

79. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

80. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

THIRD CAUSE OF ACTION

Failure to Make a Reasonable Accommodation

(Against all Defendants)

81. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

82. Mr. Fallon was an employee of SBS.

83. Defendants, SBS, are employers within the meaning of FEHA.

84. FEHA provides in pertinent part that employers must make reasonable accommodation for employees' known physical or mental disabilities/medical conditions. Employers must engage in a timely, good faith, interactive process with the employee to determine effective reasonable accommodations. Gov. Code. § 12940(m),(n).

85. The actions and conduct of Defendants, as alleged hereinabove, constitute failure to accommodate Mr. Fallon's shoulder/arm disability and mental health disability in violation of FEHA.

86. Mr. Fallon repeatedly reported sufficient information to make known about his disability and/or medical condition concerning his should/arm and his mental health disability.

87. After his injury, Mr. Fallon could have carried out all of his essential job functions with his reasonable accommodation without causing an undue burden on SBS.

88. Mr. Fallon could have received reasonable accommodation in January 2024 when his protected leave ended.

89. As described above, Defendants took inadequate action when they refused to provide reasonable accommodation and instead terminated Mr. Fallon's employment.

90. Mr. Fallon was harmed.

91. The failure to provide reasonable accommodation was a substantial factor in causing Mr. Fallon's harm.

92. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

93. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

FOURTH CAUSE OF ACTION

Failure to Engage in the Interactive Process

(Against all Defendants)

94. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

95. Ms. Fallon was an employee of SBS.

96. Defendants, SBS, are employers within the meaning of FEHA.

97. FEHA provides in pertinent part that it is an unlawful practice for an employer not to engage in a timely, good faith, interactive process with an employee concerning reasonable accommodation. Gov. Code. § 12940(n).

98. Defendants' conduct, as alleged herein, constitutes failure to engage in the interactive process in violation of FEHA.

99. Defendants never engaged with Ms. Fallon about his disability and/or medical condition despite being put on notice of such disability and/or medical condition. They failed to explain what, whether, and to what extent her requests for reasonable accommodations could be granted.

100. When Mr. Fallon's protected leave ended, they simply terminated him without any discussion or interactive process whatsoever.

101. Ms. Fallon was harmed.

102. The failure to engage in an interactive process was a substantial factor in causing Mr. Fallon's harm.

103. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

104. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

FIFTH CAUSE OF ACTION

FEHA Retaliation

(Against all Defendants)

105. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

106. Mr. Fallon was an employee of SBS.

107. Defendants, SBS, are employers within the meaning of FEHA.

108. FEHA prohibits retaliation against an employee who has opposed or reported any practice forbidden by FEHA, and against an employee who requested reasonable accommodation. Gov. Code. § 12940(h).

109. SBS retaliated against Mr. Fallon for reporting to Defendant disability/medical condition discrimination, and subsequent retaliation for reporting disability/medical condition discrimination.

110. SBS also retaliated against Mr. Fallon for requesting reasonable accommodation such as taking medical leave.

111. A causal link existed between Mr. Fallon's protected conduct and Defendants' adverse employment actions including, among other things, the termination of his employment.

112. Mr. Fallon was harmed.

113. The retaliation was a substantial factor in causing Mr. Fallon's harm.

114. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

115. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

SIXTH CAUSE OF ACTION

CFRA Interference

(Against all Defendants)

116. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

117. Mr. Fallon was an employee of SBS.

118. Defendants, SBS, are employers within the meaning of the CFRA

119. Mr. Fallon was eligible for and met all qualifications to take protected medical leave under the CFRA due to his disability/medical conditions including his arm/shoulder injury and his mental health disability.

120. Mr. Fallon had been employed for 12 months and had worked at least 1,250 hours in the prior 12 months before the scheduled leave, and/or was otherwise eligible to take protected leave under the CFRA;

121. SBS has at least five employees.

122. Mr. Fallon requested protected medical leave on multiple occasions throughout 2024 as alleged above.

123. Mr. Fallon took protected leave on multiple occasions as alleged above.

124. SBS interfered with protected leave when it and/or its affiliates and/or attorneys contacted him numerous times during his leave asking for his participation in returning a company car and in an investigation, which interfered with his ability to be free from work during the leave.

125. Mr. Fallon was harmed.

126. SBS's retaliatory conduct was a substantial factor in causing Mr. Fallon harm.

127. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

128. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

SEVENTH CAUSE OF ACTION

CFRA Retaliation

(Against all Defendants)

129. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

130. Mr. Fallon was an employee of SBS.

131. Defendants, SBS, are employers within the meaning of the CFRA

132. Mr. Fallon was eligible for and met all qualifications to take protected medical leave under the CFRA due to his disability/medical conditions including his arm/shoulder injury and his mental health disability.

133. Mr. Fallon had been employed for 12 months and had worked at least 1,250 hours in the prior 12 months before the scheduled leave, and/or was otherwise eligible to take protected leave under the CFRA;

134. SBS has at least five employees.

135. Mr. Fallon requested protected medical leave on multiple occasions throughout 2024 as alleged above.

136. Mr. Fallon took protected leave on multiple occasions as alleged above.

137. Mr. Fallon was retaliated against after taking his protected leave and ultimately fired for requesting and taking protected leave.

138. Mr. Fallon's request for protected leave and taking protected leave was a substantial motivating reason for the discharge.

139. Mr. Fallon was harmed.

140. SBS's retaliatory conduct was a substantial factor in causing Mr. Fallon harm.

141. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

142. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero

regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

EIGHTH CAUSE OF ACTION

Failure to Reimburse Expenses

(Against all Defendants)

143. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

144. Labor Code section 2802 requires an employer to indemnify its employees for all necessary expenditures or losses incurred by the employee in direct consequence or discharge of their duties or in obedience to the directions of the employer.

145. For over one year from the beginning of his employment from November 2022 through early December 2023, Mr. Fallon was required by Defendant to use his personal vehicle to perform essential job duties such as, without limitation, visiting clients. Mr. Fallon put over 15,000 miles on his car.

146. Defendant did not provide Mr. Fallon a company vehicle or any alternative means of transportation for performing these work-related duties.

147. Mr. Fallon incurred necessary business expenses, including but not limited to gasoline (some of the time he had a gas card provided), maintenance, depreciation, insurance, and general wear and tear associated with using his personal vehicle for Defendant's benefit.

148. Defendant failed to reimburse Mr. Fallon for these necessary expenditures, despite knowing that Mr. Fallon was incurring them and despite circumstances making it clear that reimbursement was required under California law, constituting a violation of this section of the labor code.

149. As a direct and proximate result of Defendant's violations, Mr. Fallon has been damaged in an amount to be proven at trial, including, without limitation, unreimbursed business expenses, interest, and all other amounts recoverable under Labor Code section 2802.

150. Pursuant to Labor Code section 2802(c), Mr. Fallon is entitled to recover the full amount of unreimbursed expenses plus interest and reasonable attorney's fees and costs incurred in enforcing his rights.

NINTH CAUSE OF ACTION

Wrongful Termination in Violation of Public Policy

(Against all Defendants)

151. Mr. Fallon re-alleges and incorporates by reference each and every allegation set forth above and below.

152. It is an unlawful employment practice and violation of public policy to discharge an employee based on his medical condition/disability, which is exactly what Defendants did.

153. It is also an unlawful employment practice and violation of public policy to discharge an employee in retaliation for reporting unlawful conduct and/or requesting reasonable accommodations, which is exactly what Defendants did.

154. It is also an unlawful employment practice and violation of public policy to discharge an employee in retaliation for requesting and/or taking protected leave, which is exactly what Defendants did.

155. Mr. Fallon was harmed.

156. The wrongful termination was a substantial factor in causing Mr. Fallon's harm.

157. As a direct result of the unlawful employment practices of Defendants as alleged hereinabove, Mr. Fallon has suffered damages including, without limitation, lost income, compensation and benefits, physical/emotional distress, pain and suffering, humiliation, and loss of reputation and other injuries in an amount to be proven at trial.

158. Defendants' actions were fraudulent, malicious, and oppressive, because, among other things, the conduct was carried out and ratified by SBS senior leadership (CEO) with zero regard for Mr. Fallon's physical safety or legal rights. Thus, Mr. Fallon is entitled to recover punitive damages from Defendants, and each of them.

PRAYER FOR RELIEF

WHEREFORE, Mr. Fallon prays that this Court enter judgment in his favor on every claim and relief against Defendants and each of them, as follows:

1. For compensatory damages;
2. For punitive damages;
3. For pre-judgment and post-judgment interest, at the legal rate;
4. For attorney's fees and costs pursuant to applicable law including, without limitation, FEHA, the CFRA, and Labor Code section 2802;
5. For applicable penalties;
6. For costs of suit;
7. For declaratory relief; and
8. For all such other and further relief as the court may deem just, proper and equitable.

Dated: December 10, 2025

Chizen Law, Professional Corporation

/s/ Steven Chizen
Steven Chizen

Attorney for Plaintiff Steven Fallon

JURY DEMAND

PLAINTIFF STEVEN FALLON demands trial by jury on all issues so triable.

Dated: December 10, 2025

Chizen Law, Professional Corporation

/s/ Steven Chizen
Steven Chizen

Attorney for Plaintiff Steven Fallon