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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 **MARINE GRIGORIAN**, on behalf of
13 herself and all others similarly situated,

14 Plaintiff,

15 v.

16 **CITIBANK, N.A.**

17 Defendant.

CASE NO. 2:23-cv-9519

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

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28 **COMPLAINT**

1 COMES NOW Plaintiff, Marine Grigorian, on behalf of herself and all others similarly situated,
2 by and through her undersigned attorneys, brings this Class Action Complaint against Citibank,
3 N.A. (hereinafter “Citi”) alleges as follows. Plaintiff bases the allegations in this Class Action
4 Complaint on personal knowledge as to matters related to Plaintiff and on information and
5 belief as to all other matters, through the investigation of Plaintiff’s counsel. Plaintiff believes
6 substantial evidentiary support exists for the allegations set forth herein, and she seeks a
7 reasonable opportunity for discovery.

8 **I.**

9 **NATURE OF THE ACTION**

10 1. In what is the equivalent to financial institutions’ discriminatory practice of “red-
11 lining” in denying mortgages to African-Americans in the mid-twentieth century in the United
12 States, Citi has expanded on this disgusting financial practice to “red-line” credit cards to those
13 of Armenian national origin or heritage. Plaintiff alleges, on behalf of herself and all others
14 similarly situated (the “Class,” as defined below), that from a period from 2015 to the date of
15 class certification (the “Class Period”), Citi had implemented a systemwide policy that applied
16 extra scrutiny and denied certain credit card applications and canceling of active credit cards of
17 those suspected having Armenian national origin or had a name denoting one having Armenian
18 heritage.

19 2. The discriminatory practice was implemented by Citi’s employees searching for
20 the “ian” or “yan” contained at the end of the last name, especially if the resident address of the
21 applicant or card holder was located at or near Glendale, California. Citi employed this
22 discriminatory policy in a perverse effort to try to reduce its risk of credit fraud, by effectively
23 labeling those of Armenian heritage as credit risks or “Armenian bad guys”.

24 3. This ethnically discriminatory policy more frequently denied credit to applicants
25 and/or had credit revoked based on Armenian national origin or heritage as compared to other
26 similarly situated applicants and has no legitimate, non-discriminatory reason for this practice.

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B. Defendants

9. Citibank, N.A. (hereinafter “Citi” or “Defendant”) is a national bank with its principal place of business located in New York, New York, with branches and operations all throughout the United States, including California.

IV.

FACTUAL ALLEGATIONS

HISTORY OF DISCRIMINATION AGAINST ARMENIANS IN THE UNITED STATES

10. Armenians began immigrating from the Ottoman Empire after the first massacres perpetuated on them in 1894-1896. The extreme racial, religious and cultural discrimination led to hundreds of thousands Armenians killed and displaced. Many moved throughout the world with help of Christian missionaries based out of New England.

11. Then with the fall of the Ottoman Empire and the rise of the Young Turks, a systematic extermination of Armenians was perpetuated by the Turkish government from 1915-1923, resulting in 1.5 million Armenians to perish. Those who survived fled into exile. Again, many were relocated to the United States, with large Armenian communities forming in California, including Fresno, San Francisco Bay Area and Los Angeles.

12. As Armenians began to make America their home, they were not welcomed with open arms. Discrimination was rampant and was both overt and covert. For instances, at the insistence of the community leaders, many property deeds throughout the Central Valley of California had covenants restricting sale of real estate to Armenians. Some of the restrictive covenants in these deeds would read as follows:

“Neither said premises nor any part thereof shall be used in any matter whatsoever or occupied by any Negro, Chinese, Japanese, Hindu, Armenian, Asiatic or native of the Turkish Empire.”

13. With the fall of the Soviet Union, another mass exodus of Armenians occurred, with many making Los Angeles, and specifically, Hollywood and then Glendale and its surrounding areas home. Once again, the discrimination of these new immigrants arose.

1 14. The discrimination has taken many forms. For instance, in the more recent times,
2 the discrimination has been overt and has been perpetuated violently. An Armenian church
3 building was fire-bombed in San Francisco back in 2020. The same year, an Armenian
4 elementary and middle school in San Francisco was shot at and vandalized with derogatory
5 statements painted on the walls. Similar vandalism occurred at an Armenian school located in
6 the San Fernando Valley around the same time period.

7 15. There have been countless covert levels of discrimination experienced by those of
8 Armenian ancestry. As significant majority of the discriminatory conduct is not explicit and
9 overt, it is nearly impossible to prove that economic opportunities, job opportunities, loan
10 applications, school admissions, etc. were rejected, denied and/or reduced because of one's
11 Armenian ancestry. The Armenian-American community has always suspected that the
12 discrimination was omnipresent, but arguments were always raised that these were isolated
13 instances and in this modern age, institutional discrimination is a fallacy.

14 **CITI'S SYSTEMATIC DISCRIMINATORY PRACTICE**

15 16. What was once suspected has now become clear. Citi issued credit cards through
16 retail services - partnerships with retailers throughout the United States that would have their
17 brand name associated with the credit card. These credit cards would place the retailer's brand
18 name on the credit card and have other arrangements with these retailers, but for which Citi
19 would review credit card applications and whether to continue issuing credit to holders of those
20 cards even after they have been approved.

21 17. Since 2015 to the present, Citi's employees charged with underwriting a credit
22 card application and approving, denying or otherwise make a credit card decision of Citi's retail
23 services applications routinely applied extra scrutiny to, negatively assessed, and often denied
24 credit card applications if the applicant's last name ended in -ian or -yan, especially if the
25 applicant's address was in or around Glendale, California.

26 18. Citi's employees considered whether the applicant's or current credit card
27 holder's last name ended in -ian or -yan, especially if the applicant's address was in or around
28 Glendale, California, in order to identify credit card applications submitted by an applicant of

1 perceived Armenian national origin or heritage. Furthermore, Citi’s employees targeted those
2 with an Armenian heritage as they were perceived as likely to incur significant charges and then
3 “bust out,” meaning they would leave the country or otherwise not pay off the charges.

4 19. Citi’s employees took actions that negatively affected applicants for Citi
5 retail services credit cards, holders of these credit cards, and/or credit line increases with a last
6 name ending in -ian or -yan, especially if their address was in or around Glendale, California,
7 including:

- 8 a. denying the application, or approving credit on less favorable terms;
- 9 b. applying additional scrutiny to the application, including requiring
10 further information from the applicant such as verification of their
11 income or assets;
- 12 c. placing a block or a hold on the applicant’s account; and
- 13 d. referring the applicant to Citi’s fraud prevention units for
14 further review and a potential account freeze, line decrease, or account
15 closure.

16 20. In order to enforce this discriminatory policy, Citi took corrective action against
17 employees if they failed to identify and deny applications if the applicant’s last name ended in -
18 ian or -yan and address was in or around Glendale, California, including action that could affect
19 the agent’s performance rating, pay, and authority to approve future Citi retail services credit
20 card applications.

21 21. To further disguise and conceal this illegal, discriminatory and unethical conduct,
22 Citi’s supervisors and trainers instructed Citi’s employees to conceal their reliance in the credit
23 decision on applicants’ last names ending in -ian or -yan and addresses in or around Glendale,
24 California, including by telling Citi’s employees not to discuss it in writing or on recorded phone
25 lines.

26 **FEDERAL INVESTIGATION AND CONSENT ORDER**

27 22. The United States Consumer Financial Protection Bureau conducted a years’ long

1 investigation on Citi’s practices and found that under statistical regression analyses of Citi retail
2 services credit card data from 2015 through 2021 for applications referred for judgmental review
3 show that Respondent denied Citi retail services credit card applications from applicants with a
4 last name ending in -ian or -yan more often than other similarly situated applicants, especially if
5 the applicant also had an address in or around Glendale, California. These national-origin-based
6 disparities in underwriting Citi retail services credit cards are statistically significant, meaning
7 they are highly unlikely to have occurred by chance.

8 23. Citi did not have a legitimate, non-discriminatory explanation for its pattern or
9 practice of applying extra scrutiny to, negatively assessing, and often denying credit card
10 applications or revoking credit cards for Citi retail services credit cards if the applicant’s or
11 credit card holder’s last name ended in -ian or -yan or address was in or around Glendale,
12 California, and to the extent that Citi identified purportedly legitimate, non-discriminatory
13 reasons for denying such applications and/or revoking credit cards already issued, those reasons
14 were pretextual justifications for denying the applications and existing credit cards based on the
15 national origin and/or heritage Citi attributed to the applicant or credit card holder.

16 24. The Consumer Financial Protection Bureau found Citi’s pattern or practice
17 described above discriminated against Citi retail services credit card applicants and holders in
18 multiple aspects of the dealings related to the application or extended credit on the basis of
19 national origin in violation of Equal Credit Opportunity Act, 15 U.S.C. § 1691(a)(1), and
20 Regulation B, 12 C.F.R. §§ 1002.4(a), 1002.6.

21 25. When Citi denied a Citi retail services credit card application or revoked existing
22 credit based on the applicant’s Armenian national origin, Citi failed to inform the applicant
23 accurately and adequately of the reason for the action in the adverse action notice as required by
24 15 U.S.C. § 1691(d) and 12 C.F.R. § 1002.9(a)-(b).

25 26. An example of this was in 2016, a Citi employee with authority to approve or
26 deny Citi retail services credit card applications messaged another employee, “it’s been a while
27 since I declined for possible credit abuse/YAN—gimme some reasons I can use, or do I need to
28 not worry about it?” The other employee responded with several apparently pretextual reasons

1 the first employee could use. Just one second later, the first employee replied that the application
2 was “declined due to possible credit abuse.”

3 27. This practice persisted even after concerns about denying applicants based
4 on an address in Glendale were raised by Citi employees. For example, in 2018, a Citi employee
5 sent an email to a group manager of Citi retail services and others, asking for advice about how
6 to document adverse action reasons, stating “we can’t tell [customers they are being declined]
7 because they are in Glendale.”

8 28. Citi therefore failed to provide a legally compliant statement of the specific
9 reasons for the adverse action that Citi took against Citi retail services credit card applicants who
10 were denied credit and/or those who held Citi retail credit cards and had them revoked based on
11 their Armenian national origin, in violation of ECOA, 15 U.S.C. § 1691(d), and Regulation B, 12
12 C.F.R. § 1002.9(a)-(b). Citi’s Equal Credit Opportunity Act violations described above also
13 constitute violations of § 1036(a)(1)(A) of the Consumer Financial Protection Act, 12 U.S.C. §§
14 5481(12)(D), (14), 5536(a)(1)(A); 15 U.S.C. § 1691c(b).

15 29. As a result of its investigation related to Citi’s discriminatory consumer credit
16 practices, the Consumer Financial Protection Bureau issued a Consent Order on November 7,
17 2023 executed by the Director of the Consumer Financial Protection Bureau, Rohit Chopra.

18 **GRIGORIAN IS TURNED DOWN ON HER REQUEST TO RAISE HER CREDIT**
19 **LIMITS**

20 30. Grigorian was a long time holder of a Costco retail service credit card issued
21 underwritten by Citi. She requested that her credit limit be raised on the credit card. Citi sent a
22 notice in March of 2023 denying the request.

23 31. At no time was a legitimate reason provided as to why her credit card limit
24 request was denied. It did not occur to her until the Consumer Financial Protection Bureau’s
25 Consent Order was published in the New York Times, Bloomberg, Associated Press and the Los
26 Angeles Times did it dawn on her that her ethnicity was the basis of the denial of the limits being
27 raised.

V.

CLASS ALLEGATIONS

32. Plaintiff brings this action as a class action pursuant to Federal Rule of Civil Procedure 23. Plaintiff seeks to represent the following class:

Those who resided within the State of California at the time they either (1) applied for and were denied a Citi retail services credit card; (2) had an issued Citi retail services credit card and had it revoked; and/or (3) sought to increase their credit limit on their Citi retail services credit card and were denied from the dates of 2015 through June 2023 and who resided in California. Excluded from the California Class are Defendant’s current or former officers, directors, and employees; counsel for Plaintiff and Defendant, and the judicial officer to whom this lawsuit is assigned.

33. Certification of Plaintiff’s claims for class-wide treatment is appropriate because Plaintiff can prove the elements of her claims on a class-wide basis using the same evidence as individual Class members would use to prove those elements in individual actions alleging the same claims.

Numerosity—Federal Rule of Civil Procedure 23(a)(1)

34. The members of the Class are so numerous that individual joinder of all Class members is impracticable. While the exact number of Class members is presently unknown to Plaintiff, based on Defendant’s volume of financial sales, Plaintiff estimates that each Class numbers in the thousands.

35. Members of the Class may be notified of the pendency of this action by recognized, Court-approved notice dissemination methods, which may include United States Mail, electronic mail, Internet postings, and/or published notice.

Commonality and Predominance—Federal Rule of Civil Procedure 23(a)(2) and (b)(3)

36. This action involves common questions of law or fact that predominate over any questions affecting individual Class members.

37. All Class members are exposed to Defendant’s discriminatory and illegal credit

1 card approval and/or maintenance practices related to issuing or maintaining retail services credit
2 cards to those of Armenian descent.

3 38. Furthermore, common questions of law or fact include:

4 a. Whether Defendant's denial of retail services credit cards constitutes an unfair and
5 deceptive business practices;

6 b. Whether Defendant's conduct described above constitutes a violation of the Equal
7 Opportunity Act, 15 U.S.C. §§1691(a) and 1691e;

8 c. Whether Plaintiff and the Class members are entitled to actual, statutory, or other
9 forms of damages and other monetary relief; and

10 d. Whether Plaintiff and the Class members are entitled to equitable relief, including but
11 not limited to injunctive relief and equitable restitution.

12 39. Citi engaged in a common course of conduct in contravention of the laws
13 Plaintiff seeks to enforce individually and on behalf of the other Class members. Similar or
14 identical statutory and common law violations, business practices, and injuries are involved.
15 Individual questions, if any, pale by comparison, in both quality and quantity, to the numerous
16 common questions that dominate this action. Moreover, the common questions will yield
17 common answers.

18 **Typicality—Federal Rule of Civil Procedure 23(a)(3)**

19 40. Plaintiff's claims are typical of the claims of other Class members because,
20 among other things, Defendant injures all Class members through the uniform misconduct
21 described herein, and all Class members are subject to Defendant's discriminatory credit card
22 approval policies.

23 41. Further, there are no defenses available to Defendant that are unique to Plaintiff.

24 **Adequacy of Representation—Federal Rule of Civil Procedure 23(a)(4)**

25 42. Plaintiff will fairly and adequately represent and protect the interests of the
26 members of each class. Plaintiff does not have any interests that are adverse to those of the Class
27 members. Plaintiff has retained competent counsel experienced in class action litigation and
28 intends to prosecute this action vigorously.

1 **Declaratory and Injunctive Relief—Federal Rule of Civil Procedure 23(b)(2)**

2 43. Defendant has acted or refused to act on grounds generally applicable to Plaintiff
3 and the Class members, thereby making appropriate final injunctive and declaratory relief, as
4 described below, with respect to the Class as a whole.

5 **Superiority—Federal Rule of Civil Procedure 23(b)(3)**

6 44. A class action is superior to other available methods for the fair and efficient
7 adjudication of this controversy. Class action treatment will permit a large number of similarly
8 situated persons to prosecute their common claims in a single forum simultaneously, efficiently,
9 and without the unnecessary duplication of effort and expense that numerous individual actions
10 would engender. Since the damages suffered by individual Class members are relatively small
11 the expense and burden of individual litigation make it virtually impossible for the Class
12 members to seek redress for the wrongful conduct alleged, while an important public interest will
13 be served by addressing the matter as a class action.

14 45. The prerequisites for maintaining a class action for injunctive or equitable relief
15 under Federal Rule of Civil Procedure 23(b)(2) are met because Defendant has acted or refused
16 to act on grounds generally applicable to each Class, thereby making appropriate final injunctive
17 or equitable relief with respect to each Class as a whole.

18 **VI.**

19 **CLAIMS FOR RELIEF**

20 **FIRST CLAIM FOR RELIEF**

21 **(Violation of the Equal Credit Opportunity Act, 15 U.S.C. §§ 1691(a), 1691e**

22 **On Behalf of the Class)**

23 46. Plaintiff incorporates and realleges the paragraphs above as if fully set forth
24 herein.

25 47. Plaintiff, on behalf of herself and the Class, brings this claim for violation
26 of the Equal Credit Opportunity Act, 15 U.S.C. §1691(a) (“ECOA”).

27 48. The ECOA prohibits discrimination against an applicant for credit based on race,
28 color, religion, national origin, sex or marital status, or age

1 49. The ECOA creates a private right of action for actual, compensatory and punitive
2 damages, equitable relief, and recovery of costs. 15 U.S.C. § 1691e(a)-(f).

3 50. Citi, on the one hand, and Plaintiff and the Class members, on the other hand,
4 engaged in seeking to obtain and deciding to issue credit as the ECOA contemplates, among
5 other reasons, Citi provides credit through credit retail services cards through an application
6 process to Plaintiff and the Class members who either sought to obtain a credit card or had one
7 and had it revoked based on their Armenian heritage, origin and/or nationality.

8 51. Defendant's actions, representations, and conduct have violated, and continue to
9 violate, the ECOA they extend to transactions that are intended to result, or that have resulted,
10 denying credit to Plaintiff and the Class based on the discrimination set forth above.

11 52. As alleged above, Citi has have violated, and continues to violate, 15 U.S.C. §
12 1691(a) by discriminating to retail services credit card applicants and/or retail credit card holders
13 who had credit revoked based on solely their Armenian ethnicity, nationality and/or heritage.

14 53. On information and belief, Defendant's actions were willful, wanton,
15 fraudulent, and made with conscious disregard. Citi's efforts to conceal this illegal and
16 discriminatory conduct by instructing its employees to not put anything as to the discriminatory
17 reasons for the credit denials in writing and only was also malicious.

18 54. On information and belief, officers, directors, or managing agents at Citi
19 authorized the use of these discriminatory credit practices.

20 55. Pursuant to 15 U.S.C. §§ 1691e(c) and (d), Plaintiff and the Class members seek
21 an injunction to bar Citi from continuing the practice as Plaintiff intends to reapply for a Citi
22 retail services credit card, declaratory relief finding Citi has violated the ECOA and reasonable
23 attorneys' fees and costs.

24 56. THEREFORE, Plaintiff prays for relief as set forth below.

25 **SECOND CLAIM FOR RELIEF**

26 **(Violation of the Unfair Competition Law, BUS. & PROF. CODE § 17200 et seq.**

27 **On Behalf of the Class)**

28 57. Plaintiff incorporates and realleges the paragraphs above as if fully set forth

1 herein.

2 58. Plaintiff brings this claim for violation of the Unfair Competition Law, BUS. &
3 PROF. CODE § 17200 et seq. (“UCL”), on behalf of the Class.

4 59. The circumstances giving rise to Plaintiff’s and the Class members’ allegations
5 include Citi’s corporate policies regarding the issuing, raising the limit and/or maintaining credit
6 of retail services credit cards to the general public.

7 60. Under the UCL, “unfair competition” means and includes “any unlawful, unfair
8 or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising and
9 any act prohibited by” the BUS. & PROF. CODE § 17200.

10 61. By engaging in the acts and practices described herein, Defendant commits one or
11 more acts of “unfair competition” as the UCL defines the term.

12 62. Defendant committed, and continue to commit, “unlawful” business acts or
13 practices by, among other things, violating the ECOA, 15 U.S.C. § 1691(d), and Regulation B,
14 12 C.F.R. § 1002.9(a)-(b). § 1036(a)(1)(A) of the Consumer Financial Protection Act, 12 U.S.C.
15 §§ 5481(12)(D), (14), 5536(a)(1)(A); 15 U.S.C. § 1691c(b)as described herein.

16 63. Defendant committed, and continue to commit, “unfair” business acts or
17 practices by, among other things:

18 a. Engaging in conduct for which the utility of the conduct, if any, is
19 outweighed by the gravity of the consequences to Plaintiff and the
20 members of the Class;

21 b. Engaging in conduct that is immoral, unethical, oppressive, unscrupulous,
22 or substantially injurious to Plaintiff and the members of the Class; and

23 c. Engaging in conduct that undermines or violates the spirit or intent of the
24 consumer protection laws that this Class Action Complaint invokes.

25 64. Defendant commits unlawful, unfair, and/or fraudulent business acts or practices
26 by, among other things, engaging in conduct Defendant knew or should have known was likely
27 to and do deceive reasonable consumers, including Plaintiff and the Class members.

28 65. As detailed above, Defendant’s unlawful, unfair, and/or fraudulent practices

1 include making false and/or misleading representations that the retail services credit card was
2 denied or revoked the credit card application and/or existing credit.

3 66. Plaintiff and the Class members believed Citi's conduct in denying or revoking
4 credit was made for a reason other than unlawful discrimination.

5 67. Plaintiff and the Class members are injured in fact and lose money as a
6 result of Defendant's conduct of improperly denying or revoking credit for retail services credit
7 cards. Plaintiff and the Class were denied credit, either through the denial of the application for
8 retail services credit cards and/or having an existing retail services credit card revoked.

9 68. Plaintiff and the Class members seek declaratory relief, restitution for
10 monies wrongfully obtained, injunctive relief, and other relief allowable under Business and
11 Professions Code section 17203, including but not limited to enjoining Defendant from
12 continuing to engage in its unfair, unlawful, and/or fraudulent conduct alleged herein.

13 69. THEREFORE, Plaintiff prays for relief as set forth below.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff, on behalf of herself and the Class members, respectfully
16 requests that the Court enter an Order:

17 A. Certifying the Class pursuant to Federal Rule of Civil Procedure 23 and adjudging
18 Plaintiff and her counsel adequate Class representatives;

19 B. Declaring Defendant financially responsible for notifying the Class members of
20 the pendency of this suit;

21 C. Requiring Defendant to pay Plaintiff and the Class members economic, monetary,
22 consequential, compensatory, or statutory damages, whichever is greater, and, if Plaintiff
23 proves Defendant's conduct was willful, awarding Plaintiff and the Class members
24 exemplary damages to the extent to which the law provides;

25 D. Awarding restitution of all monies Defendant acquired by means of any act or practice
26 this Court declares was wrongful, or other appropriate remedy in equity, to Plaintiff and
27 the Class members;

28 E. Awarding declaratory and injunctive relief as the law and equity permit,

1 including: enjoining Defendant from continuing the unlawful practices set forth above;
2 and directing Defendant to rectify or cease its discriminatory credit practice.

3 F. Awarding Plaintiff, individually and on behalf of the Class members, her
4 expenses and costs of suit, including reasonable attorneys’ fees and reimbursement of
5 reasonable expenses to the extent to which the law provides;

6 G. Awarding to Plaintiff, individually and on behalf of the Class members, pre- and
7 post-judgment interest to the extent the law allows; and

8 H. For such other and further relief as this Court deems just and proper.

9
10 Dated: November 10, 2023 **LAW OFFICES OF ARA JABAGCHOURIAN, P.C.**

11
12 By: /s/ Ara Jabaghourian
13 **ARA JABAGCHOURIAN**
14 *Attorneys for Plaintiff*

15 **VII. JURY DEMAND**

16 Plaintiff demands trial by jury on all issues so triable.

17
18 Dated: November 10, 2023 **LAW OFFICES OF ARA JABAGCHOURIAN, P.C.**

19 By: /s/ Ara Jabaghourian
20 **ARA JABAGCHOURIAN**
21 *Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself)

MARINE GRIGORIAN, on behalf of herself and all others similarly situated

DEFENDANTS (Check box if you are representing yourself)

Citibank, N.A.

(b) County of Residence of First Listed Plaintiff Los Angeles

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant New York

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

ARA JABAGCHOURIAN, LAW OFFICES OF ARA JABAGCHOURIAN, P.C.
1650 S. Amphlett Boulevard, Suite 216, San Mateo, CA 94402 (650) 437-6840

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.)

1. U.S. Government Plaintiff
 2. U.S. Government Defendant
 3. Federal Question (U.S. Government Not a Party)
 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

- | | | | | | |
|---|--------------------------------|--------------------------------|---|--------------------------------|--------------------------------|
| Citizen of This State | PTF <input type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

1. Original Proceeding
 2. Removed from State Court
 3. Remanded from Appellate Court
 4. Reinstated or Reopened
 5. Transferred from Another District (Specify)
 6. Multidistrict Litigation - Transfer
 8. Multidistrict Litigation - Direct File

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ over 75,000.00

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Equal Credit Opportunity Act, 15 U.S.C. §§ 1691(a), 1691e - ethnic discrimination on issuing credit cards.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 140 Negotiable Instrument	PERSONAL INJURY	PERSONAL PROPERTY	<input type="checkbox"/> 530 General	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Other:	SOCIAL SECURITY
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 862 Black Lung (923)
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 485 Telephone Consumer Protection Act	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	REAL PROPERTY	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	LABOR	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 896 Arbitration		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision			<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 751 Family and Medical Leave Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<p>QUESTION A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.</p>	<p align="center">STATE CASE WAS PENDING IN THE COUNTY OF:</p> <input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo <input type="checkbox"/> Orange <input type="checkbox"/> Riverside or San Bernardino	<p align="center">INITIAL DIVISION IN CACD IS:</p> Western Southern Eastern
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<p>QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question C. If "yes," answer Question B.1, at right.</p>	<p>B.1. Do 50% or more of the defendants who reside in the district reside in Orange Co? check one of the boxes to the right →</p> <p>B.2. Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) check one of the boxes to the right →</p>	<p><input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Continue to Question B.2.</p> <p><input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.</p>
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<p>QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question D. If "yes," answer Question C.1, at right.</p>	<p>C.1. Do 50% or more of the plaintiffs who reside in the district reside in Orange Co? check one of the boxes to the right →</p> <p>C.2. Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) check one of the boxes to the right →</p>	<p><input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Continue to Question C.2.</p> <p><input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.</p>
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QUESTION D: Location of plaintiffs and defendants?	A. Orange County	B. Riverside or San Bernardino County	C. Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County
Indicate the location(s) in which 50% or more of <i>plaintiffs who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Indicate the location(s) in which 50% or more of <i>defendants who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p>D.1. Is there at least one answer in Column A? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes," your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question E, below, and continue from there. If "no," go to question D2 to the right. →</p>	<p>D.2. Is there at least one answer in Column B? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes," your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question E, below. If "no," your case will be assigned to the WESTERN DIVISION. Enter "Western" in response to Question E, below. ↓</p>
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QUESTION E: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, C, or D above: →	WESTERN

QUESTION F: Northern Counties?
 Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? Yes No

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed in this court?

NO YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court?

NO YES

If yes, list case number(s): _____

Civil cases are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

A civil forfeiture case and a criminal case are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT): /s/ Ara Jabaghourian

DATE: November 10, 2023

Notice to Counsel/Parties: The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))