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10 Attorneys for Plaintiff
11 SEPIDEH ZAREI

12 **SUPERIOR COURT OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES**
14 **(Central)**

15 SEPIDEH ZAREI, an individual,
16 Plaintiff,
17 vs.

18 SAKS & COMPANY LLC; ALISSA
19 MATHIS; and DOES 1-10, inclusive,
20 Defendants.

21 **CASE NO. 23STCV07072**
22 **CURTIS A. KIN**
23 **Dept. 72**

24 **SECOND AMENDED COMPLAINT**
25 **FOR:**

- 26 **1. NATIONAL ORIGIN**
DISCRIMINATION (FEHA);
- 27 **2. HOSTILE WORK ENVIRONMENT**
(FEHA);
- 28 **3. RETALIATION (FEHA);**
- 4. FAILURE TO PREVENT**
DISCRIMINATION, HARASSMENT
AND RETALIATION (FEHA);
- 5. WRONGFUL TERMINATION IN**
VIOLATION OF PUBLIC POLICY;
- 6. INTENTIONAL INFLICTION OF**
EMOTIONAL DISTRESS.

JURY TRIAL DEMANDED

Plaintiff, based on information and belief, states as follows for this complaint:

1 **FACTS COMMON TO ALL CAUSES OF ACTION**

2 ***Plaintiff Was an Exemplary Employee to Her Employer***

3 1. Plaintiff brings this action to recover damages against SAKS & COMPANY
4 LLC (Saks), ALISSA MATHIS and DOES 1-10 (collectively, Defendants) for unlawful
5 termination of Plaintiff's employment due to her national origin and in retaliation for
6 reporting harassment by her colleagues and supervisors.

7 2. Specifically, Plaintiff had been employed by Defendants in sales from March
8 2018 to September 3, 2021. At first, her employment with Saks was unremarkable as she was
9 an exemplary employee consistently hitting the highest sales numbers nationwide. Almost
10 immediately, however, it became clear that Plaintiff was being singled out, harassed and
11 discriminated against based on her national origin and religion. It soon turned into a group
12 mentality where management and other colleagues formed a gang to harass, discriminate and
13 eventually terminate Plaintiff.

14 3. It first began in June 2018, at first with co-worker Kenny, who made fun of
15 Plaintiff's grammar and accent due to her national origin. He did so in front of customers.
16 Garcia witnessed this and sat idly by. Management ratified Kenny's conduct.

17 4. Next came Brian, in 2019, who was actually a managing agent like Garcia,
18 engaging in the same exact harassing conduct—making fun of her accent and grammar due
19 to her national origin. Brian showed complete disdain and disgust towards Plaintiff. Brian
20 used to refer to Plaintiff as "Puppy" instead of outright calling her a b***. Garcia, once
21 again, witnessed this conduct, ignored Plaintiff's complaints and ratified Brian's conduct.

22 5. Near the end of 2019, Brian brings Alissa (from Florida) to work with them.
23 Brian were long-time friends from outside of work. It was patently obvious that they ganged
24 up to make Plaintiff's work life miserable. Alissa jumped on the harass-to-terminate-Plaintiff
25 campaign. She would throw boxes in the stock room for Plaintiff to clean up. She spoke
26 down to he and bad mouthed her to the other coworkers saying she can't speak properly.

1 Plaintiff began to feel anxiety about going to work because of Alissa's bullying. Plaintiff
2 suspected Kenny had a role in Alissa's animosity towards Plaintiff.

3 6. Indeed, Alissa even upped it a notch and threw a shoe box at Plaintiff,
4 assaulting her. She then went so far as to intentionally shoulder bump Plaintiff, nearly
5 causing her to fall. Each of these incidents was reported not only by Plaintiff, but by other
6 co-workers (Eddie). As usual, Garcia did nothing.

7 7. The harassment continued throughout 2019, 2020 and 2021.

8 8. On numerous occasions, the gang would demean Plaintiff by stating to her "this
9 is the United States" in response to Plaintiff speaking Farsi with her Iranian clientele, which
10 was a vast majority of her customers. This would occur **in the presence** of management with
11 authority to prevent the harassment but nobody protected Plaintiff.

12 9. Alissa's assault on Plaintiff did not end there, in April 2021, Alissa body-
13 slammed Plaintiff while she was holding boxes of shoes to the point that she had the wind
14 knocked out of her. Per pattern and practice, this was reported, ratified and consented to by
15 management.

16 10. Indeed, Plaintiff reported each incidence of harassment to management and
17 management sat idly by and did nothing. Management was continuously unresponsive to
18 Plaintiff's complaints such that the gang continued the harassment with impunity.

19 11. Eventually the gang picked up enough steam and the harassing co-workers
20 were able to gang up enough that they influenced Plaintiff's termination. On or about
21 September 3, 2021, Plaintiff was terminated as a direct result of her national origin and for
22 reporting the harassment,

23 ***Plaintiff Was Part of a Protected Class Engaging In Protected Activities***

24 ***Yet Was Unlawfully Terminated***

25 12. **Protected Class.** At all times relevant, Plaintiff was and is an Iranian Muslim
26 female.

27 13. **Protected Activities.** Plaintiff engaged in the following protected activities:
28

- a. Being Iranian and having an accent;
- b. Sexual orientation (not being gay or lesbian like all of her co-workers);
- c. Reporting workplace harassment;
- d. Various other acts according to proof;

14. **Adverse Employment Action.** Firing Plaintiff.

Plaintiff's Harm

15. Plaintiff's damages are growing with time and include the following:

- a. Loss of income;
- b. Loss of future income;
- d. Substantial and profound pain and suffering and emotional distress;
- e. Other forms of economic and non-economic damage; and
- f. Punitive damages in an amount up to nine times the compensatory

damages due to the egregious, willful and malicious conduct of Defendants through managing agents.

16. Plaintiff has performed all conditions and obligations required of her to be performed.

Right to Sue

17. Plaintiff filed a timely charge of retaliation, discrimination, and harassment with the DFEH and, on September 2, 2022 and received a Notice of Case Closure informing them of their rights to sue. As such, Plaintiff has exhausted all of her administrative remedies.

18. Due to Defendants' baseless and wrongful termination of Plaintiff's employment, she has suffered substantial damages, including loss of income and severe emotional distress, humiliation, anxiety and worrisome. In addition, Defendants are subject to exposure for punitive damages based upon their acts of malice, oppression and fraud as those words are used and defined in Civil Code § 3294.

PARTIES

19. Plaintiff Sepideh Zarei is a resident of the State of California, County of Los Angeles. At all relevant times, Plaintiff was employed by Defendants.

20. Defendants Saks & Company LLC is a Delaware corporation. At all relevant times, Defendant was Plaintiff's employer.

21. Defendant Alissa Mathis is an individual residing in County of Los Angeles and at all relevant times was a managing agent of Saks.

22. Defendants DOES 1 through 10, inclusive, are sued herein under fictitious names. Their true names and capacities are unknown to Plaintiff at this time. When their true names and capacities are ascertained, Plaintiff will amend this complaint by inserting their true names and capacities herein. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named Defendants is responsible in some manner for the occurrences herein alleged, and that Plaintiff's damages as herein alleged were proximately caused by those Defendants. Each reference in this complaint to "defendants," "Defendant," or a specifically named defendant refers also to all Defendants sued under fictitious names.

23. Plaintiff is informed and believes and thereon alleges that each of the defendants designated herein as DOE took part in and participated with Defendants in all matters referred to herein and was in some manner responsible for the injuries and losses suffered by Plaintiff.

24. Plaintiff is informed and believes and thereon alleges that at all times herein mentioned each of the Defendants was the agent, servant and/or employee or occupied other relationships with each of the other named Defendants and at all times herein mentioned acted within the course and scope of said agency and/or employment and/or other relationship and each other Defendant has ratified, consented to, and approved the acts of his agents, employees, and representatives, and that each actively participated in, aided and abetted, or assisted one another in the commission of the wrongdoing alleged in this Complaint.

1 **JURISDICTION AND VENUE**

2 25. This Court has jurisdiction over the action under Article 6, Section 10 of the
3 California Constitution, and Section 410.10 of the California Code of Civil Procedure. This
4 Court has personal jurisdiction over the parties because Plaintiff submits to the jurisdiction
5 of the Court and Defendant resides in the County of Los Angeles and the State of California.

6 26. Venue is proper within this judicial district under Section 395 of the California
7 Code of Civil Procedure because a substantial part of the acts, conduct, events or omissions
8 occurred within the State of California, Los Angeles County.

9 **FIRST CAUSE OF ACTION**

10 **NATIONAL ORIGIN DISCRIMINATION (FEHA)**

11 **CAL. GOV. CODE § 12940**

12 **(Against Saks and Does 1-5)**

13 27. The preceding paragraphs of this Complaint are realleged and incorporated by
14 reference.

15 28. At all relevant times, there was an employer/employee relationship between
16 the Plaintiff and Defendants.

17 29. On or about September 3, 2021, Defendants discriminated, retaliated and
18 wrongfully terminated Plaintiff on the basis of her race and national origin.

19 30. Plaintiff's national origin and race was a substantial motivating factor for
20 terminating her employment.

21 31. As a proximate result of Defendants' actions, Plaintiff has suffered and
22 continues to suffer substantial losses incurred in earnings, bonuses, deferred compensation
23 and other employment benefits. As a further proximate result of Defendants' actions, Plaintiff
24 has suffered and continues to suffer emotional distress, mental anguish, embarrassment,
25 humiliation and anxiety all to her damage in an amount to be proved at trial. Plaintiff will
26 seek leave of court to amend her complaint to allege the correct amount at the time of trial or
27 according to proof at trial.
28

1 32. Defendants committed the above acts maliciously, fraudulently and
2 oppressively, with the wrongful intention of injuring Plaintiff, from an improper and evil
3 motive amounting to despicable conduct, and in conscious disregard of Plaintiff's rights. The
4 acts alleged above were known to, authorized and ratified by Defendants. Plaintiff is,
5 therefore, entitled to recover punitive damages from Defendant in an amount according to
6 proof.

7 33. As a result of Defendant's discriminatory acts as alleged in this complaint,
8 Plaintiff is entitled to reasonable attorneys' fees and costs of said suit as provided by
9 California Government Code § 12965, subsection (b).

10 **SECOND CAUSE OF ACTION**

11 **HOSTILE WORK ENVIRONMENT HARASSMENT**

12 **CAL. GOV. CODE § 12940**

13 **(Against All Defendants)**

14 34. The preceding paragraphs of this Complaint are realleged and incorporated by
15 reference.

16 35. At all relevant times, there was an employer/employee relationship between
17 the Plaintiff and Defendants.

18 36. Plaintiff was subjected to unwarranted harassing conduct because of her
19 national origin and religion.

20 37. The harassing conduct was severe and pervasive.

21 38. A reasonable person in Plaintiff's circumstances would have considered the
22 work environment to be hostile or abusive.

23 39. Plaintiff considered the work environment to be hostile and abusive.

24 40. Defendants' managing and supervising agents engaged in the conduct.
25 Defendants' supervisor and agents knew or should have known of the conduct and failed to
26 take immediate and appropriate corrective action.

27 41. Defendants' conduct was a substantial factor in causing Plaintiff's harm.
28

42. As a proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer substantial losses incurred in earnings, bonuses, deferred compensation and other employment benefits. As a further proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer emotional distress, mental anguish, embarrassment, humiliation and anxiety all to her damage in an amount to be proved at trial. Plaintiff will seek leave of court to amend her complaint to allege the correct amount at the time of trial or according to proof at trial.

43. Defendants committed the acts herein despicably, maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, from an improper and evil motive amounting to malice, and in conscious disregard of the rights and safety of plaintiff and others. Plaintiff is thus entitled to recover punitive damages from Defendants in an amount according to proof.

44. As a result of Defendant's discriminatory acts as alleged in this complaint, Plaintiff is entitled to reasonable attorneys' fees and costs of said suit as provided by California Government Code § 12965, subsection (b).

THIRD CAUSE OF ACTION

RETALIATION IN VIOLATION OF FEHA CAL. GOV. CODE § 12940

(Against Saks and Does 1-5)

45. The preceding paragraphs of this Complaint are realleged and incorporated by reference.

46. At all relevant times, there was an employer/employee relationship between the Plaintiff and Defendants.

47. Defendants terminated Plaintiff's employment on September 3, 2022, due to her national origin and religion, and for reporting of harassment and retaliation regarding the same.

48. Plaintiff's reporting of the national origin and religious discrimination was a motivating reason for her termination in violation of the Fair Employment and Housing Act, Cal. Gov't Code §§ 12940 *et seq.*

49. Defendants' retaliatory conduct was a substantial factor in causing Plaintiff's harm.

50. As a proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer substantial losses incurred in earnings, bonuses, deferred compensation and other employment benefits. As a further proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer emotional distress, mental anguish, embarrassment, humiliation and anxiety all to her damage in an amount to be proved at trial. Plaintiff will seek leave of court to amend her complaint to allege the correct amount at the time of trial or according to proof at trial.

51. Defendants committed the acts herein despicably, maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, from an improper and evil motive amounting to malice, and in conscious disregard of the rights and safety of plaintiff and others. Plaintiff is thus entitled to recover punitive damages from Defendants in an amount according to proof.

52. As a result of Defendant's discriminatory acts as alleged in this complaint, Plaintiff is entitled to reasonable attorneys' fees and costs of said suit as provided by California Government Code § 12965, subsection (b).

FOURTH CAUSE OF ACTION

**FAILURE TO PREVENT DISCRIMINATION, HARASSMENT AND
RETALIATION (CAL. GOV. CODE SECTION 12940 *ET SEQ.*)**

(Against Saks and Does 1-5)

53. The preceding paragraphs of this Complaint are realleged and incorporated by reference.

54. At all times mentioned in this complaint, Government Code § 12940(k) was in full force and effect and was binding on Defendants. This subsection requires Defendants to take all reasonable steps necessary to prevent discrimination, harassment and retaliation from occurring. As alleged above, Defendants violated this subsection by failing to take all reasonable steps necessary to prevent discrimination and retaliation from occurring against Plaintiff. Indeed, Defendants took no steps, let alone reasonable steps.

55. As a proximate result of Defendants' failure to take reasonable steps to prevent discrimination, harassment and retaliation against Plaintiff, Plaintiff has suffered and continues to suffer substantial losses in earnings and the value of other employment benefits and has suffered and continues to suffer severe emotional and mental distress, anguish, humiliation, embarrassment and shock, all to her damage in an amount according to proof.

56. Defendants committed the above acts maliciously, fraudulently and oppressively, with the wrongful intention of injuring plaintiff, from an improper and evil motive amounting to despicable conduct, and in conscious disregard of Plaintiff's rights. The acts alleged above were known to, authorized and ratified by Defendants. Plaintiff is, therefore, entitled to recover punitive damages from Defendants in an amount according to proof.

57. As a result of Defendants' acts as alleged in this complaint, Plaintiff is entitled to reasonable attorneys' fees and costs of said suit as provided by California Government Code section 12965, subsection (b).

FIFTH CAUSE OF ACTION

WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY

(Against Saks and Does 1-5)

58. The preceding paragraphs of this Complaint are realleged and incorporated by reference.

59. At all relevant times, there was an employer/employee relationship between the Plaintiff and Defendants.

60. Plaintiff's employment was terminated as a result of Defendants' violation of fundamental public policies. It is against fundamental California Public Policy to discriminate and/or harass an employee on the basis of national origin and religion.

61. As a proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer substantial losses incurred in earnings, bonuses, deferred compensation and other employment benefits. As a further proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer emotional distress, mental anguish, embarrassment, humiliation and anxiety all to her damage in an amount to be proved at trial. Plaintiff will seek leave of court to amend her complaint to allege the correct amount at the time of trial or according to proof at trial.

62. Defendants, and each of them, did the acts above maliciously, fraudulently and oppressively, amounting to despicable conduct, and in conscious disregard of Plaintiff's rights. The acts alleged herein were known to, authorized and ratified by Defendants. Plaintiff is, therefore, entitled to recover punitive damages from Defendants, and each of them, in an amount according to proof.

SIXTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Against All Defendants)

63. The preceding paragraphs of this Complaint are realleged and incorporated by reference.

64. When Defendants and their agents did the acts described in this Complaint, Defendants did so deliberately and intentionally so as to cause Plaintiff extreme emotional distress. Further, Defendants also acted, as alleged herein, in conscious disregard of the rights of Plaintiff.

65. The above acts of Defendants and their agents constituted an intentional infliction of severe emotional distress against Plaintiff, and such infliction was a substantial factor in causing damage and injury to Plaintiff.

66. The conduct set forth of Defendants and their agents, as described in paragraphs 1 through 5 above, was extreme and outrageous and an abuse of the authority.

67. Said conduct was intended to cause severe emotional distress to Plaintiff, or was done in conscious disregard of the probability of causing such distress.

68. As a proximate and legal result of said conduct, Plaintiff has suffered, and continues to suffer, pain, discomfort, mental anguish, anxiety, humiliation and embarrassment, all in an amount according to proof at trial. Such harm includes, but is not limited to, being embarrassed, humiliated and scared, sustaining injury to her nervous system and persons, all of which have caused and continue to cause Plaintiff great physical and mental pain and suffering.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter an order or judgment against the Defendants, and each of them, as follows:

1. Award general and special damages, according to proof;
2. Award of punitive damages;
3. Award of attorneys' fees and costs; and
4. Such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury in this action.

Dated: November 14, 2023

By: /s/ Reza Sina
Reza Sina
Attorneys for Plaintiff

PROOF OF SERVICE

(1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA)
) ss.

COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California in the office of a member of the bar of this Court at whose direction the service was made. I am over the age of 18, and not party to the within action. My business address is 3727 W. Magnolia Blvd., Burbank, CA 91505.

On November 14, 2023, I served a copy of the following document(s) described as:

1. SECOND AMENDED COMPLAINT

on the interested party(ies) in this action as follows:

Victoria Shin Fisher & Phillips LLP 444 South Flower Street Suite 1500 Los Angeles, CA 90071 vshin@fisherphillips.com	
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By Mail: By placing a true copy thereof enclosed in a sealed envelope(s) addressed as above, and placing each for collection and mailing on that date following ordinary business practices. I am “readily familiar” with this business’s practices for collecting and processing correspondence for mailing.

By Overnight Delivery: I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed as above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

X By E-Mail or Electronic Transmission: Per Emergency Rule 12 mandating/allowing electronic service in all cases. I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

X State: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the above date at Los Angeles, California.

/s/ Reza Sina

REZA SINA

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Reza Sina (SBN 250428) 3727 W. Magnolia Blvd., #277 Burbank, CA 91505 TELEPHONE NO.: 310-957-2057 FAX NO. (Optional): E-MAIL ADDRESS (Optional): reza@sinalawgroup.com ATTORNEY FOR (Name): Plaintiff		To keep other people from seeing what you entered on your form, please press the Clear This Form button at the end of the form when finished. Electronically FILED by Superior Court of California, County of Los Angeles 11/06/2024 4:02 PM David W. Slayton, Executive Officer/Clerk of Court, By J. Lopez, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Sepideh Zarei DEFENDANT/RESPONDENT: SAKS & COMPANY LLC		
NOTICE OF SETTLEMENT OF ENTIRE CASE		CASE NUMBER: 23STCV07072 JUDGE: Hon. Joseph Lipner DEPT.: 72

NOTICE TO PLAINTIFF OR OTHER PARTY SEEKING RELIEF

You must file a request for dismissal of the entire case within 45 days after the date of the settlement if the settlement is **unconditional**. You must file a dismissal of the entire case within 45 days after the date specified in item 1b below if the settlement is **conditional**. Unless you file a dismissal within the required time or have shown good cause before the time for dismissal has expired why the case should not be dismissed, the court will dismiss the entire case.

To the court, all parties, and any arbitrator or other court-connected ADR neutral involved in this case:

1. This entire case has been settled. The settlement is:
 - a. ☐ **Unconditional.** A request for dismissal will be filed within 45 days after the date of the settlement.
Date of settlement:
 - b. ☒ **Conditional.** The settlement agreement conditions dismissal of this matter on the satisfactory completion of specified terms that are not to be performed within 45 days of the date of the settlement. A request for dismissal will be filed no later than (date): **January 15, 2025**
2. Date initial pleading filed:
3. Next scheduled hearing or conference:
 - a. Purpose: **Status Conference**
 - b. ☒ (1) Date: **12/2/24**
 (2) Time: **8:30 am**
 (3) Department: **72**
4. Trial date: **06/16/2025**
 - a. ☐ No trial date set.
 - b. ☒ (1) Date: **06/16/2025**
 (2) Time: **8:30 am**
 (3) Department: **72**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: **11/6/2024**

Reza Sina


 (SIGNATURE)

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

PLAINTIFF/PETITIONER: Sepideh Zarei	CASE NUMBER:
DEFENDANT/RESPONDENT: SAKS & COMPANY LLC	23STCV07072

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF SETTLEMENT OF ENTIRE CASE**

(NOTE: You cannot serve the Notice of Settlement of Entire Case if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):
3727 W. Magnolia Blvd., Burbank, CA 91505

2. I served a copy of the *Notice of Settlement of Entire Case* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):

a. ☐ deposited the sealed envelope with the United States Postal Service.

b. ☒ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Settlement of Entire Case* was mailed:

a. on (*date*): 11/6/2024

b. from (*city and state*): Los Angeles

4. The envelope was addressed and mailed as follows:

a. Name of person served:
Anet Castro Drapalski
Street address: 444 South Flower Street
City: Los Angeles
State and zip code: CA 90071

c. Name of person served:

Street address:
City:
State and zip code:

b. Name of person served:

Street address:
City:
State and zip code:

d. Name of person served:

Street address:
City:
State and zip code:

☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached 0.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 11/6/2024

Reza Sina

(TYPE OR PRINT NAME OF DECLARANT)

► *Reza Sina*

(SIGNATURE OF DECLARANT)

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For your protection and privacy, please press the Clear This Form button after you have printed the form.

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