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7
8 **BEFORE THE FAIR EMPLOYMENT AND HOUSING COMMISSION**
9 **OF THE STATE OF CALIFORNIA**
10

11 In the Matter of the Complaint of
12 THE DEPARTMENT OF FAIR
EMPLOYMENT AND HOUSING,

) Case Nos. U-200910-G-0012-00-p
) U-200910-G-0011-00-p
) U-200910-Q0003-00

13 vs.

14 LAW SCHOOL ADMISSION COUNCIL,
15 INC.,

) **NOTICE OF CLASS ACTION**
) **COMPLAINT AND DIRECTOR'S**
) **COMPLAINT**

16 Respondent,

) (Gov. Code §§ 12960, 12961 and 12965,
) subd. (a).)

17 HAMID MICHAEL HEJAZI; NICHOLAS E.
18 JONES; and [REDACTED],

19 Complainants.
20

21 **TO LAW SCHOOL ADMISSION COUNCIL, INC., 662 Penn Street, Box 40, Newton,**
22 **Pennsylvania, 18940:**

23 PLEASE TAKE NOTICE that pursuant to Government Code sections 12960 and 12961, the
24 Director of the DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING (hereinafter "the
25 Department") has determined that the cases listed below will be treated and proceed as a group or
26 class complaint for all purposes, and the Director has issued the following Complaint of
27 Discrimination on behalf of the group or class described below:

1 Case number U-200910-G-0011-00-p, filed by Complainant HAMID MICHAEL HEJAZI
2 against Respondent LAW SCHOOL ADMISSION COUNCIL, INC. on January 19, 2010.

3 Case number U-200910-G-0012-00-p, filed by Complainant NICHOLAS E. JONES against
4 Respondent LAW SCHOOL ADMISSION COUNCIL, INC. on January 21, 2010.

5 Case number U-200910-Q0003-00, filed by Complainant [REDACTED] against
6 Respondent LAW SCHOOL ADMISSION COUNCIL, INC. on May 9, 2010.

7 The Director's determination and issuance is based on the following:

8 1. Complainants HAMID MICHAEL HEJAZI, NICHOLAS E. JONES and [REDACTED]
9 [REDACTED] (hereinafter "Complainants") filed individual verified complaints in writing with the
10 Department on the dates herein indicated alleging that Respondent LAW SCHOOL ADMISSION
11 COUNCIL, INC. (hereinafter "LSAC") engaged in unlawful practices against them which were
12 discriminatory on the basis of disability, in violation of the Fair Employment and Housing Act
13 ("FEHA"), Government Code section 12900, *et. seq.* and the Unruh Civil Rights Act, Civil Code
14 section 51.

15 2. The Department's investigation revealed that LSAC is a proper respondent for all
16 purposes in this matter.

17 3. The group or class of which the Complainants are members is comprised of all
18 disabled individuals in the State of California who have or will request a reasonable
19 accommodation for the Law School Admission Test ("LSAT"), administered by the LSAC, and
20 who have or will be unlawfully denied such request from January 19, 2009 to the conclusion of the
21 Department's investigation of this complaint.

22 4. There are common questions of law and fact involved which affect the parties to be
23 represented and those persons similarly situated in that during the course of the Department's
24 investigation the Complainants provided and the Department obtained information, which, if
25 proven, indicates that LSAC unlawfully denied or denies disabled individuals reasonable
26 accommodations for the LSAT. Respondent disputes some of these allegations. The Department
27 will continue the investigation to determine the merits of these allegations.

1 5. The nature of the group or class is such that proof of a single set of facts will
2 establish the right of each member of the group to recover.

3 6. The Director will fairly and accurately represent the interests of the group or class.

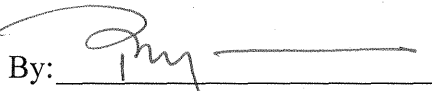
4 7. You may, but need not, respond to this notification in writing by submitting your
5 response to:

6 Alexandra Seldin
7 Special Investigations Unit Administrator
8 Department of Fair Employment and Housing
9 2218 Kausen Drive, Suite 100
10 Elk Grove, CA 95758

11 DATED: July 22, 2010

12 DEPARTMENT OF FAIR EMPLOYMENT
13 AND HOUSING

14 PHYLLIS W. CHENG
15 Director

16 By: 
17 Phyllis W. Cheng