

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT IN AND FOR  
MIAMI-DADE COUNTY, FLORIDA

SUDEEP GARG,

CASE NO.

Plaintiff,

vs.

WORLD WIDE PRIMATES, INC.,

Defendant.

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**COMPLAINT**

COMES NOW, Plaintiff, SUDEEP GARG (hereafter referred to as “Plaintiff”), by and through his undersigned counsel, and sues the Defendant, WORLD WIDE PRIMATES, INC., a Florida corporation, and alleges as follows:

**INTRODUCTION**

1. This is a proceeding for compensatory damages, punitive damages, and costs and attorneys' fees to remedy religious discrimination based upon statutorily protected activities affecting the terms, conditions and privileges of employment, and to redress the deprivation of rights secured to the Plaintiff under by the Florida Civil Rights Act of 1992, Florida Statutes §760, et seq. (“FCRA”).

**JURISDICTION AND VENUE**

2. Jurisdiction is invoked pursuant to the FCRA.
3. Venue is proper as all claims asserted herein arose in Miami-Dade County.
4. At all times material hereto, the Plaintiff was residing in Miami-Dade County, Florida, sui juris, and an employee or former employee of the Defendant.
5. At all times material hereto, the Plaintiff was and continues to be a member of Hindu

religion, and is a member of a protected class within the meaning of the FCRA.

6. At all times material hereto, the Plaintiff was an employee within the meaning of the FCRA.

7. At all times material hereto, the Defendant was a corporation authorized to do business and services in this judicial circuit, was the employer or former employer of the Plaintiff, and is an employer as defined by the FCRA.

### **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

8. The Plaintiff has fulfilled all conditions precedent to the institution of this action and received his Right-to-Sue from the US EEOC.

### **STATEMENT OF FACTS**

9. The Plaintiff was hired by the Defendant as procurement director, to begin on January 23, 2023.

10. This was after Defendant conducted a thorough background check.

11. As a result of the job offer, Plaintiff moved his entire family from India to Miami on January 21, 2023.

12. However, Defendant terminated Plaintiff just nine days into his employment due Plaintiff's views on animal rights.

13. While Plaintiff initially made Defendant aware of these views, as they are based upon his Hindu religious beliefs against animal slaughter, Defendant located social media posts from years earlier that Plaintiff had set forth.

14. Due to these posts, an expression of Plaintiff's religious beliefs, Defendant terminated Plaintiff on or about February 3, 2023.

## COUNT I

### FCRA --- RELIGIOUS DISCRIMINATION

15. The Plaintiff incorporates by reference paragraphs 1- 14 herein.

16. The Defendant discriminated against the Plaintiff in the terms and conditions of his employment, and otherwise denied the Plaintiff job opportunities because of his religious beliefs.

17. The unlawful discriminatory actions by the Defendant and its agents and employees, as set forth herein, were and are intentional, willful, malicious and with gross disregard for the Plaintiff's rights, and violate the FCRA.

18. As a direct and proximate result of the Defendant's unlawful and discriminatory treatment, the Plaintiff has suffered damages and will continue to suffer irreparable injury and damages in the future, including, but not limited to:

- a. Damage to reputation, confidence and self-esteem;
- b. Loss of past and future income;
- c. Loss of future earning capacity;
- d. Loss of other fringe benefits;
- e. Stress, anxiety and emotional distress;
- f. Significant past and future pain and suffering; and
- g. Other financial losses.

19. The Plaintiff is entitled to an award of reasonable attorney's fees, expert fees, costs and expenses related to this litigation.

WHEREFORE, the Plaintiff, SUDEEP GARG, requests that judgment be entered against the Defendant, WORLD WIDE PRIMATES, INC., for damages, including compensatory, consequential, and punitive, and all equitable relief, in addition to all litigation expenses and costs,

including attorneys' fees and any other lawful and equitable relief this Court deems to be just and proper.

**DEMAND FOR JURY TRIAL**

The Plaintiff demands trial by jury of all issues triable as of right by a jury.

Respectfully submitted on August 30, 2023.

Law Offices of Levy & Levy, P.A.  
2844 North University Drive  
Coral Springs, Florida 33065  
Telephone: (954) 763-5722  
Facsimile: (954) 763-5723  
Service Email: [assistant@levylevy.com](mailto:assistant@levylevy.com)  
*Counsel for Plaintiff*

*s/Chad Levy*

CHAD E. LEVY, ESQ.

F.B.N.: 0851701

[chad@levylevy.com](mailto:chad@levylevy.com)

HARRIS NIZEL, ESQ.

F.B.N.: 0807931

[harris@levylevy.com](mailto:harris@levylevy.com)