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9 IN THE CIRCUIT COURT FOR THE STATE OF OREGON  
10 FOR MULTNOMAH COUNTY  
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12 **ANTOINETTE ROBINSON**

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14 Plaintiff

15 vs.

16 **WALMART, INC.**  
17 **JOHN DOE #1**  
18 **JOHN DOE #2**

19 Defendants  
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Case No.

**COMPLAINT**

**Discrimination**  
**False Arrest**

Jury Trial Requested  
Amount in Controversy: \$45,000  
Not Subject to Mandatory Arbitration  
Filing Fee Authority: ORS 21.160(1)(b)

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1.

**FACTUAL ALLEGATIONS**

On or around the evening of February 27, 2019 Ms. Robinson went shopping while black at the Portland, Oregon Walmart store near the Eastport Plaza Shopping Center. Ms. Robinson was soon approached by two Walmart security guards who falsely accused Ms. Robinson of theft. The two Walmart security guards used profanity, detained Ms. Robinson and searched her purse. Ms. Robinson was eventually released after the security guards discovered that Ms. Robinson had no stolen goods in her purse. Walmart and its security guards intentionally chose to accuse Ms. Robinson of theft, detain, and search her based on her race and the color of her skin. Defendants' discrimination and false arrest as alleged in this complaint made Ms. Robinson feel upset and humiliated and embarrassed, and made her feel worse than she already did as a recently hospitalized patient recovering from cancer.

2.

Ms. Robinson is an individual citizen of Oregon. Walmart, Inc. (Walmart) is a Delaware corporation with its principal place of business in Arkansas. Walmart is engaged in the retail sale of a variety of consumer merchandise and goods, and does regular and sustained business in Multnomah County, Oregon, and its store near the Eastport Plaza Shopping Center was a place of public accommodation within the meaning of ORS 659A.400. John Doe #1 is an individual citizen of Oregon and acted as a security guard and agent for Walmart. John Doe #2 is an individual citizen of Oregon and acted as a security guard and agent for Walmart.

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**3.**

**CLAIMS FOR RELIEF**

**Claim #1 – Discrimination**

As alleged in this complaint, defendants violated ORS 659A.403 by discriminating against Ms. Robinson on account of her race and the color of her skin. As a result, Ms. Robinson is entitled to judgment against defendants determining that they unlawfully discriminated against her in violation of Oregon law, allowing fair compensation determined by the jury to be reasonable but not to exceed \$45,000, and reimbursed fees, costs, and disbursements under ORS 659A.885. Upon discovery of evidence of defendants' malice, Ms. Robinson intends to amend this complaint to include a claim for punitive damages.

**4.**

**Claim #2 – False Arrest**

As alleged in this complaint, defendants' stop and detention of Ms. Robinson was intentional, Ms. Robinson was aware of her detention, and the detention was unlawful. As a result, Ms. Robinson is entitled to judgment against defendants determining that they detained her in violation of Oregon law and allowing fair compensation determined by the jury to be reasonable but not to exceed \$45,000, and costs and disbursements. Upon discovery of evidence of defendants' malice, Ms. Robinson intends to amend this complaint to include a claim for punitive damages.

**5.**

Request for jury trial.

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2 **6.**

3 **PRAYER**

4 Ms. Robinson seeks relief against defendants as requested in paragraphs 3  
5 and 4, and for maximum pre-judgment and post-judgment interest, and for any other  
6 relief this Court may determine is fair and proper.  
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8  
9 March 21, 2019

10 **RESPECTFULLY FILED,**

11 s/ Michael Fuller

12 **Michael Fuller, OSB No. 09357**

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