



March 29, 2017. This lawsuit is timely filed within 90 days of the issuance of her notice of right to sue.

4. This Court has subject matter jurisdiction over this case based on federal question jurisdiction. There is federal question jurisdiction because Plaintiff's claim is based on Title VII of the Civil Rights Act of 1964.

5. Venue is proper in this district and division pursuant to 28 U.S.C. § 1391(b)(1), (2) because Defendant resides in and/or has its principal place of business in the Houston Division of the Southern District of Texas and/or a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in the Houston Division of the Southern District of Texas.

6. The Foreign Sovereign Immunities Act ("FSIA") does not apply to Plaintiff's claims because the "commercial activity" exception contained in 28 U.S.C. § 1605(a)(2) applies to Plaintiff's job with Defendant.

### **III. THE PARTIES**

7. Plaintiff Ghania Brakchi is a natural person residing in Fort Bend County, Texas. She was employed by Defendant for about five years until December 24, 2015.

8. Defendant the Consulate General of the State of Qatar is located at 1990 Post Oak Blvd., Suite 900, Houston, Texas 77056 and may be served at that location.

### **IV. FACTUAL BACKGROUND**

9. Plaintiff was sexually harassed by the Consul General, Mr. Mohammed Al-Homaid, beginning in 2012 until the wrongful termination of her employment.

10. Plaintiff, of Algerian national origin and a U.S. citizen, was employed primarily as a translator and also performed administrative functions for the office, including the Consul

General and/ or his wife. Mr. Al-Homaid insisted that she go to events, like political speeches, with him. Plaintiff also managed the buildout and move of the offices, organized, made and ordered coffee, and helped with planning of community events. Her job responsibilities are commercial in nature, not governmental in nature. She had no discretionary duties, and she was not involved in sovereign law or policy.

11. She was the only female in the Consul General's office who did not regularly cover up, as it is not customary for Algerian women to cover up like Qatari women.

12. Mr. Al-Homaid required Plaintiff to carry a passport sized photo of him in her wallet at all times. He threatened to fire her if she was found without his picture in her wallet.

13. He purchased a cell phone for her so that he could reach her at all times, including outside of work hours. He called for any reason and no reason at all. He texted her using Whatsup App? He repeatedly called and texted her after work hours, including in the middle of the night.

14. He told her that he wanted to spend more time with her and get to know her better. He told her how beautiful she is, how good she smelled, and he said he wanted to see her face.

15. Mr. Al-Homaid had Plaintiff move her office to be near his office. On numerous occasions, he insisted that she sit in his office for long periods and made her uncomfortable by leering and staring at her and her breasts. He would move his chair so that they would sit side-by-side to be near her. He would require that she lean over him at his computer to open his e-mail or internet browser, and other tasks that he knew how to perform on the computer, just so that she would stand closer or lean over him so that he could get a closer and better look at her.

16. When she wasn't in his office, he would follow her around the office making her uncomfortable. Beginning in 2014, and continuing until the termination of her employment, he touched Plaintiff at least twice a week on her hand, making her very uncomfortable.

17. He also bought her a necklace, gold ring and perfume.

18. He requested that she travel with him to New York City for work-related reasons and told her that her husband should not travel with them.

19. When her daughter was in the hospital and while Plaintiff was at the emergency room with her daughter, he called her repeatedly for no reason.

20. As a married Muslim and Islamic female, all of this behavior was very offensive to and very distressing for Plaintiff.

#### **V. COUNT ONE – HOSTILE WORK ENVIRONMENT**

21. All conditions precedent, if any, to this suit, have been fulfilled.

22. Mr. Al-Homaid's behavior was severe and pervasive and created a hostile work environment in violation of Title VII of the Civil Rights Act of 1964.

#### **VI. COUNT TWO -DISCRIMINATORY TERMINATION**

23. Plaintiff adopts by reference all of the facts set forth above. *See* FED. R. CIV. P. 10(c).

24. Plaintiff's employment was terminated because of her refusal to engage in a sexual relationship with Mr. Al-Hamaid. This also constituted a violation of Title VII of the Civil Rights Act of 1964.

#### **VII. JURY DEMAND**

25. Plaintiff demands a jury trial.

**VIII. DAMAGES AND PRAYER**

26. Plaintiff asks that the Court issue a citation for Defendant to appear and answer, and that Plaintiff be awarded a judgment against Defendant for the following:

- a. Enjoining and permanently restraining these violations of law;
- b. Awarding Plaintiff actual damages in the amount of back pay and front pay;
- c. Awarding Plaintiff compensatory damages for humiliation, damages to her reputation, mental and emotional distress, and pain and suffering;
- e. Awarding Plaintiff punitive damages;
- f. Awarding Plaintiff pre-judgment and post-judgment interest;
- d. Awarding Plaintiff Court costs;
- e. Awarding Plaintiff reasonable attorneys' fees; and
- f. Awarding all other relief to which Plaintiff is justly entitled.

Respectfully submitted,

**MATÍAS J. ADROGUÉ,**  
PROFESSIONAL LIMITED LIABILITY COMPANY

By:           /s/ Matías J. Adrogué          

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