

This document has been modified to conceal the names and other identifying information about the complainant claimants as well as the demanded financial amount.

FACTS

1. On January 29, 2022, the Couple set out to enjoy a trip to celebrate their second wedding anniversary on one of Carnival's cruise lines.
2. The Couple had valid tickets to ride the cruise ship departing from Galveston, Texas on January 29, 2022.
3. The trip was particularly special because it was their first trip on a cruise ship as a couple.
4. The complainant was extremely excited because she had never been on a cruise ship before.
5. The cruise was set to last seven days, starting on January 29, 2022, and ending on February 5, 2022.
6. Prior to boarding the cruise ship, the Couple enjoyed their car ride to Galveston, Texas.
7. There were three stops to board the cruise ship.
8. The Couple made it past the initial stop without incident.
9. The Couple then arrived at the second security stop, Carnival's ticketing desk. Once at Carnival's ticketing desk, a Carnival employee, Jane Doe, refused to let the Couple onto the cruise ship without removing her hijab for a security photo.
10. Jane Doe ordered Complainant to remove her hijab.
11. The complainant explained that the scarf she wore around her head is a religious head covering and that she cannot remove it.
12. Jane Doe told Complainant that she would not be allowed to board the cruise ship unless she removed her hijab.
13. The complainant's husband, Complainant 2, intervened and again explained to Jane Doe that Complainant wears hijab in accordance with her sincerely held religious beliefs and cannot remove it in public.
14. Jane Doe was unpersuaded and responded by reiterating that if Complainant did not remove her scarf for the security photo, she would not be allowed to board the ship.

15. The Couple, attempting to resolve the matter, asked Jane Doe if Complainant could take the security photo in a private room, but Jane Doe still refused, stating that no private rooms were available.
16. After a series of back-and-forth conversations, the Complainant was forced to remove her hijab for the photo in public. To Complainant, this felt like being forced to be naked in public. Complainant 2 felt helpless to aid and protect his wife.
17. Claimants were embarrassed and humiliated by Carnival's disregard for their religious beliefs, especially since the events described above occurred in the public view of cruise ship passengers.
18. The events described above ruined what was supposed to be a romantic and joyful anniversary celebration for the Couple. Instead, because of Carnival, this became one of the worst days of the Complainant's life.
19. Carnival denied the Couple the full and equal enjoyment, on equal terms and conditions, of the accommodations, advantages, services, facilities, or privileges of a provider of public accommodations.
20. While it stated on its website that clothing items that do not cover the face do not need to be removed, Carnival provided the Couple with discriminatory service by refusing to provide service to the Couple without the removal of the hijab. Carnival did this because of Complainant's real or perceived religion or creed.
21. As a result of the Respondents' violations, Claimants have suffered damages including but not limited to, humiliation, embarrassment, and severe emotional distress.
22. Since the incident, Complainant's trust in non-family members has been severely shaken.
23. The complainant, having no family members in Texas besides her husband, has been scared to leave her house to go anywhere, worried that she will be faced with discrimination and exclusion due to her hijab without the presence of her husband.
24. Prior to the trip, Complainant used to attend a regular gathering at the park with her friends. She has not been able to go to this gathering since the trip due to the feelings of shame and humiliation she sustained as a result of the forced removal of her hijab.
25. Prior to the trip, Complainant used to accompany Complainant 2 on some trips outside the house such as trips to the grocery store. She has not been able to go with Complainant 2 on

trips outside the house due to the feelings of worry and fear she sustained as a result of the forced removal of her hijab.

26. Prior to the trip, Complainant was excited to find a job. She had received her Green Card in July 2021 and had been working on putting together her resume. She planned to start applying for jobs upon her return from the cruise trip. She has not been able to apply for a job after the trip due to her fear of facing discrimination like that she experienced by Carnival.
27. Subsequent to Carnival's discrimination against Complainant, Complainant felt a pressing need to be with her family and had to take a trip there to alleviate her stress.
28. The complainant and her husband sustained significant emotional and financial losses as a result of Carnival's religious discrimination against them.

RELIEF REQUESTED

Claimants respectfully request that the Commission:

- a. Order Carnival to delete any and all photos they have of the Complainant without her headcovering,
- b. Award damages in the amount of *redacted* to the Complainant,
- c. Award damages in the amount of *redacted* to Complainant 2,
- d. Order disciplinary action against Jane Doe,
- e. Order Carnival to enact policy changes and conduct trainings that protect future Muslim women from suffering the same reprehensible treatment as Claimant,
- f. Order Carnival to allow for hijabs to be an acceptable head covering to be worn for the security photos; and
- g. Order Carnival to produce an apology to Complainant and her husband.