

# EXHIBIT A

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

CHRISTOPHER LURES, on behalf of himself  
 and all others similarly situated,

CASE NO.: **22STCV03938**

**CLASS ACTION COMPLAINT**

Plaintiff,

- 1. FAILURE TO REIMBURSE BUSINESS EXPENSES AND LOSSES**
- 2. IMPROPER MEAL PERIODS**
- 3. IMPROPER REST PERIODS**
- 4. FAILURE TO PROVIDE ACCURATE WAGE STATEMENTS**
- 5. WAGES NOT PAID UPON SEPARATION**
- 6. VIOLATIONS OF THE UNFAIR BUSINESS PRACTICES ACT**

v.

ANTHEM, INC.; AIM SPECIALTY HEALTH;  
 ANTHEM BLUE CROSS LIFE AND  
 HEALTH INSURANCE COMPANY; BLUE  
 CROSS OF CALIFORNIA and DOES 1–50,  
 inclusive,

**DEMAND FOR JURY TRIAL**

Defendants.

## **INTRODUCTION**

1. Plaintiff Christopher Lures (hereinafter “Plaintiff” or “Mr. Lures”), individually and on behalf of all others similarly situated, brings this civil class action against Defendants ANTHEM, INC., AIM SPECIALTY HEALTH, ANTHEM BLUE CROSS LIFE AND HEALTH INSURANCE COMPANY, BLUE CROSS OF CALIFORNIA and DOES 1–50 (collectively referred to as “ANTHEM” or “Defendants”), demanding trial by jury, complaining on information and belief as follows.

2. This putative class action is brought by Plaintiff, against Defendants, and each of them for damages sustained by Plaintiff, CHRISTOPHER LURES based on Defendants’ wrongful actions and include the following causes of action: (1) Failure to Reimburse Business Expenses and Losses; (2) Improper Meal Periods; (3) Improper Rest Periods; (4) Failure to Provide Accurate Wage Statements; (5) Wages Not Paid Upon Separation; and (6) Unfair Business Practices.

3. Plaintiff petitions this Court to allow him to represent and prosecute claims against Defendants in a class action proceeding on behalf of all those similarly situated non-exempt employees (hereinafter referred to as “Class Members”), who are residents of the state of California.

## **THE PARTIES**

4. At all material times, Mr. Lures was a resident of the city of Glendale in the State of California and was employed by ANTHEM at a location in Los Angeles County, California. Plaintiff brings this action on behalf of himself and all others similarly situated as a class action. They reserve the right to name additional representatives.

5. Defendant, ANTHEM, INC., is an Indiana corporation, with its principal place of business located in Indianapolis, Indiana; Defendant, AIM SPECIALTY HEALTH, is an Illinois corporation, with its principal place of business located in Chicago, Illinois; Defendant, ANTHEM BLUE CROSS LIFE AND HEALTH INSURANCE COMPANY, is a California corporation, with its principal place of business located in Woodland Hills, California; Defendant, BLUE CROSS OF CALIFORNIA, is a California corporation with its principal place of business located in Woodland Hills, California and DOES 1–50, inclusive (hereinafter “ANTHEM” or “Defendants”).

7. The true names and capacities, whether individual, corporate, partnership, associate, or otherwise of defendants DOES 1–50, inclusive, are unknown to Plaintiff who sues these defendants by such fictitious names. (Cal. Code Civ. Proc. § 474.) Plaintiff will either seek leave to amend this Class Action Complaint or file a DOE statement to allege the true names and capacities of DOES 1–50, inclusive, when the same are ascertained.

9. Plaintiff is informed and believes, and thereon alleges, that each of Defendants knowingly and willfully acted in concert, conspired together, and agreed among themselves to enter into a combination and systemized campaign of activity to cause the injuries and damages hereinafter alleged, and to otherwise consciously and or recklessly act in derogation of Plaintiff's rights, and the trust reposed by Plaintiff in each of said Defendants, said acts being negligently and or intentionally inflicted. Said conspiracy, and Defendants' concerted actions, were such that, to Plaintiff's information and belief, and to all appearances, Defendants represented a unified body so that the actions of one defendant was accomplished in concert with, and with knowledge, ratification, authorization, and approval of each and every other defendant.

10. Plaintiff is informed and believes, and thereon alleges, that each defendant in this Complaint, is, and at all times mentioned was, the agent, servant, alter ego, and or employee of each of the other defendants, and each defendant acted within the course or scope of his, her, or its authority as the agent, servant, and or employee of each other defendant. Consequently, each and every defendant is jointly and severally liable to Plaintiff and Class Members for the damages incurred as a proximate result of each defendant's conduct.

11. This Court has jurisdiction over this action under the California Constitution, Article VI, section 10, which grants the Superior Court, “Original Jurisdiction in all causes except

1 those given by statute to other courts.” The statutes under which Plaintiff bring this action do not  
2 specify any other basis for jurisdiction.

3 12. This Court has jurisdiction over all defendants because upon information and belief,  
4 each is either a citizen of California, has sufficient minimum contacts in California, or otherwise  
5 intentionally avails itself to the California market so as to render the exercise of jurisdiction over it  
6 by the California courts consistent with traditional notions of fair play and substantial justice.

7 13. Venue as to each defendant is proper in this judicial district under California Code  
8 of Civil Procedure sections 395(a) and 395.5 as a portion of the acts complained of herein occurred  
9 in the County of Los Angeles. Either Defendants own, maintain offices, transact business, have an  
10 agent or agents within the county of Los Angeles, or otherwise are found within the County of Los  
11 Angeles. Defendants employed Plaintiff and class members in the County of Los Angeles and  
12 throughout the state of California.

### 13 **FACTUAL ALLEGATIONS**

14 14. ANTHEM employed Plaintiff as a non-exempt employee from October 2019  
15 through June 2021.

16 15. Mr. Lures held the position of “Referral Specialist” during his employment with  
17 ANTHEM. At all times during his employment with ANTHEM, Mr. Lures has lived and worked in  
18 the State of California.

19 16. At all relevant times, ANTHEM required Mr. Lures to work from his home,  
20 requiring his work location to be in the home he lives in. ANTHEM has required and continues to  
21 require the same from its current and former similarly situated employees.

22 17. Mr. Lures and Class Members incurred expenses related to computers, desk, chair,  
23 and other items related to the specific workspace to perform work for ANTHEM, reimbursement  
24 for mortgage, rent, property taxes, homeowner insurance, (underpaid) internet, telephone/cell phone  
25 expenses, utilities such as electricity, water, gas, and trash collection services, and stationery, while  
26 discharging duties under their employment with ANTHEM. ANTHEM has not reimbursed Mr.  
27 Lures and Class Members for all expenses incurred while discharging their duties for ANTHEM.  
28

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