

EXHIBIT C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ANGELO MAHER,

Plaintiff,

Index No.: 157934/2021

-against-

NUSRET NEW YORK LLC,

VERIFIED COMPLAINT

Defendant.
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Plaintiff Angelo Maher (“Plaintiff” or “Mr. Maher”), by and through his attorneys, the Law Offices of G. Oliver Koppell & Associates, complains of the above-named Defendant as follows:

PARTIES

1. At all relevant times herein, Mr. Maher was and is a resident of New York County in the State of New York. Mr. Maher’s national origin is Hispanic/Peruvian.

2. Upon information and belief, Nusret New York LLC (“Defendant”) was and still is a limited liability company duly organized and existing under and by virtue of the laws of the State of New York.

3. Upon information and belief, Defendant owns and operates Nusr-Et Steakhouse New York (“Nusr-Et”). Nusr-Et is the New York City branch of a high-end international steakhouse chain managed by a chef, Nusret “Salt Bae” Gökçe, who is known for his dramatic serving style and Instagram stardom. Nusr-Et is located at 60 W 53rd St, New York, New York 10019.

4. Nusret “Salt Bae” Gökçe (“Mr. Gökçe”) is a native of Turkey.

5. Upon information and belief, the individuals who own, operate, and manage Nusr-Et (collectively “Management”) are of Turkish descent.

FACTUAL ALLEGATIONS

6. Mr. Maher was hired as a server at Nusr-Et in or around December of 2017 and quickly established himself as a top performer amongst the service staff.

7. As evidence of Mr. Maher’s strong performance, he was asked to be part of the Employee Hiring Committee at Nusr-Et where he would travel around the country and train new servers at new Nusr-Et restaurants.

8. Mr. Maher was also regularly tasked with training new servers when they were first hired at Nusr-Et.

9. In or around May of 2019, Mr. Maher was asked to write the New Hire Employee Manual as well as the official Employee Training Manual at Nusr-Et.

10. Shortly after being hired, however, Mr. Maher soon realized that non-Turkish employees, like himself, were treated less favorably than similarly situated Turkish employees at Nusr-Et.

11. For instance, Turkish servers were consistently given assignments to serve at more desirable tables within the restaurant which resulted in them making more money for performing the same work as Mr. Maher.

12. Turkish employees were treated more favorably by management at Nusr-Et than non-Turkish employees.

13. Mr. Maher also witnessed how management would protect poorly performing Turkish employees if non-Turkish employees spoke out regarding such poor performance or misconduct.

14. Upon information and belief, information regarding tip pool practices, specifically which employees were entitled to what percentage of the total tip-pool, was intentionally withheld from non-Turkish employees. Non-Turkish employees, like Mr. Maher, were kept in the dark regarding how the tip-pool was distributed. When Mr. Maher raised concerns to Management regarding the policies concerning how the tip-pool was distributed, he was told by Volkan Avci (“Mr. Avci”), an agent, servant, and/or employee of Nusr-Et to, “Stop with this tip-pool stuff cause I’m telling you, you are on your final warning, just stay neutral.”

15. As a result of such aforereferenced disparate treatment, Mr. Maher felt added stress whenever Mr. Gökçe was present in the restaurant.

16. Management also imposed requirements at work that made Mr. Maher extremely uncomfortable and contributed to a hostile work environment. For instance, when guests would ask if the meat served in the restaurant was Halal, Mr. Maher was instructed to tell them that it was, despite the fact that this claim was not true. Being forced to lie to guests caused Mr. Maher great distress.

17. Management would also require to Mr. Maher to serve various celebrity friends of Mr. Gökçe, such as Karim “French Montana” Kharbouch, without receiving any tips.

18. Turkish employees would regularly use Turkish curse words to refer to non-Turkish employees, including Mr. Maher, at Nusr-Et.

19. Mr. Maher would be asked by management to pay out of pocket for checks of guests when he made a mistake while serving. Upon information and belief, only non-Turkish servers were asked to pay out of pocket to rectify mistakes.

20. Mr. Maher was once written up for taking a video of Karim “French Montana” Kharbouch when he was in the restaurant, despite the fact that many Turkish employees were

also recording him at the same time. Upon information and belief, none of the Turkish employees were written up for engaging in the same behavior as Mr. Maher.

21. In or around September of 2019, Mr. Maher raised concerns with management, particularly Regional Human Resources Manager Cara Frantino, an agent, servant, and/or employee of Nusr-Et, regarding concerns related to nationality-based discrimination and a hostile work environment at Nusr-Et.

22. In response, agents, servants, and/or employees of Nusr-Et engaged in multiple adverse employment actions against Mr. Maher by reducing his hours, sending him home early on his shifts, and continuing to assign him to serve less desirable sections of the restaurant.

23. These above detailed adverse employment actions had the effect of ensuring Mr. Maher made less money than similarly situated Turkish employees despite the fact that Mr. Maher was a more successful server.

24. The abuse suffered by Mr. Maher even became physical. On two occasions, agents, servants, and or employees of Defendant, acting in their official capacities as such at the time, made physical contact with Mr. Maher without his consent.

25. On one such occasion, in or around December of 2019, a Turkish busser named “Barbaros” grabbed Mr. Maher by the arm in a threatening manner after Mr. Maher had asked for help with a table. “Barbaros” would not let Mr. Maher go. Adding insult to injury, Mr. Maher was suspended from work in connection with this incident, presumably to send the message that he was never going to be treated the same as the Turkish employees.

26. On another such occasion, a Turkish manager named “Turap” slapped Mr. Maher in connection with a policy dispute.

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