

**COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION**

Ghadir Alahmar,)	
)	
Complainant,)	
)	
v.)	MCAD No. _____
)	
McDonald's Restaurant #6035 and)	
Gomez Enterprises, LLC,)	
)	
Respondents.)	

PUBLIC ACCOMMODATIONS COMPLAINT*

Date of Discrimination: June 29, 2021

1. This is a public accommodations complaint brought pursuant to G.L. c. 272, § 98, concerning an incident that occurred on June 29, 2021. On that date, employees at McDonald's Restaurant #6035 in Chicopee, Massachusetts, intentionally and maliciously discriminated against a Muslim woman and her two young children by adding bacon to a fish sandwich despite her explicit request for a plain sandwich, charging her for the bacon she had not ordered, and then, to make matters even worse, adding three to four times the amount of bacon that would normally be provided when a customer requests it. It is commonly known that Islam forbids Muslims from eating pork. McDonald's employees willfully added bacon to

* This is a redacted version of the Complaint that was filed at the Mass. Commission Against Discrimination. The names of the minor children have been removed.

the Complainant's food in an effort to offend, humiliate, and cause distress to Complainant and her young children.

PARTIES

2. Complainant Ghadir Alahmar is an adult resident of Chicopee, Massachusetts. She emigrated from Yemen to the United States in 2014 and is a permanent resident. Consistent with her Muslim faith, when in public she wears a *hijab*, Islamic headscarf, and *abaya*, a long, modest dress often worn by Muslim women.

3. Respondent McDonald's Restaurant #6035 is a Massachusetts business located at 777 Meadow Street, Chicopee, Massachusetts.

4. Upon information and belief, McDonald's Restaurant #6035 is owned and operated by Gomez Enterprises, a domestic limited liability company, with its principal place of business at 49 San Souci Drive, South Hadley, MA 01075.

FACTS

5. On June 29, 2021, at about 6:30 p.m., Complainant entered McDonald's Restaurant #6035 (hereafter "McDonald's"), with her seven-year-old twin sons, [XXX] and [YYY].

6. There were no other customers ahead of her when Complainant entered the store. Two employees were at the counter, a young white female (hereafter "Employee #1") and a young male (hereafter "Employee #2"). Neither employee greeted her. Instead, they spoke to one another about who would take her order. Employee #2 told Employee #1 that he was going on break and left.

7. Complainant told Employee #1 that she wanted a plain fish sandwich. In case the employee did not understand her due to her accent, Complainant explained that her English

was not very good, so her sons were going to speak with Employee #1. [XXX] told Employee #1 that he wanted a fish sandwich. Complainant reminded her son to tell Employee #1, "nothing but fish." [XXX] repeated his order, telling Employee No. 1 that he wanted a "plain fish sandwich with nothing on it." [YYY] ordered fries and cookies.

8. Complainant paid for the food, unaware that Employee #1 had charged her for "ONLY 2 Half Strips Bacon." A copy of the receipt is attached as **EXHIBIT A**.

9. Upon information and belief, two half-strips of bacon is a standard quantity of bacon that McDonald's adds to a burger or sandwich upon a customer's request.

10. Complainant and her children stepped aside to the area where customers wait for their orders.

11. Employee #1 left the front counter and went to the food preparation area. Complainant never saw her again.

12. A woman and three children had entered the store after Complainant and her sons. A young Hispanic male (hereafter "Employee #3") took their order. After a few minutes, Employee #3 brought the family their food and they left, while Complainant and her sons were still waiting.

13. Complainant did not understand why the family who ordered after she did was able to receive their food first, while she was still waiting and the store was not busy. She asked Employee #3 where her order was. Employee #3 replied, "I'll check, just give me a minute." He left the front counter and went to the food preparation area. Complainant never saw him again.

14. After Complainant had waited an estimated seven to 10 minutes since first placing her order, a Hispanic female (hereafter "Employee #4") came from the food preparation area with Complainant's order.

15. Complainant and her children walked a short distance to a nearby school playground, where they planned to eat. When [XXX] opened his sandwich container, he exclaimed, "It's *khinzir* (pig)!"

16. Complainant was shocked to find that three to four full strips of bacon had been added to the sandwich. She told her son not to eat the sandwich. When [XXX] complained that he was hungry, Complainant reluctantly gave him the bottom bun and the lower part of the fish filet. A photo showing the bacon and the uneaten portion of the sandwich is attached as

EXHIBIT B.

17. Complainant and her children were upset and angry by how McDonald's employees had treated them. [XXX] asked, "Why did they do this? Do they hate us?"

18. When Complainant's husband came home from work, Complainant and her sons told him what had happened.

19. At approximately 9:00 p.m., Complainant's husband returned to McDonald's. He brought with him the remains of the sandwich, still in its McDonald's packaging, and the receipt. He spoke with the with the manager and explained what had happened.

20. Upon information and belief, the McDonald's cash register uses a screen where employees touch electronic buttons showing food items and any add-ons or requests. Upon information and belief, the screen has separate buttons for "plain" and "add bacon," among other options.

21. The manager acknowledged that it was highly unlikely Employee No. 1 could accidentally press the "add bacon" button instead of the "plain" button, given their respective locations on the screen.

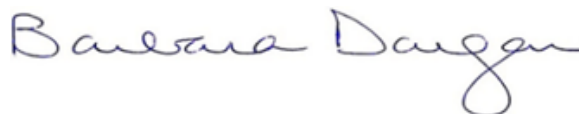
22. The manager refunded to Complainant's husband the price of the fish sandwich and two half-strips of bacon. See **EXHIBIT A**.

23. In violation of G.L. c. 272, § 98, McDonald's employees discriminated against Complainant on the basis of her religion (Islam) and national origin (Yemeni) by willfully and maliciously adding bacon to her food despite explicit requests by Complainant and her son for a plain sandwich, charging her for bacon she had not ordered, and adding an excessive quantity of bacon beyond McDonald's standard practices.

Complainant's verification is attached.

Respectfully submitted,

GHADIR ALAHMAR
By her attorney,



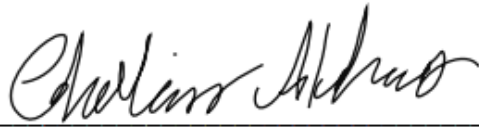
Barbara J. Dougan (BBO #558392)
COUNCIL ON AMERICAN-ISLAMIC RELATIONS,
MASSACHUSETTS (CAIR-MA)
P.O. Box 28
Arlington, MA 02476
(781) 281-9992
bdougan@cair.com

Dated: April 20, 2022

VERIFICATION

I, Ghadir Alahmar, verify that I have read the allegations contained in this Complaint and attached Exhibits, that I have personal knowledge of the facts, and that the facts stated therein are true, except those facts alleged upon information and belief and, as to those facts, I believe they are true.

Signed under the penalties of perjury this 19th day of April, 2022.



Ghadir Alahmar

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 Go to www.mcdvoice.com within 7 days
 and tell us about your visit.
 Validation Code: _____
 Expires 30 days after receipt date.
 Valid at participating US McDonald's.
 Survey Code:
 06035-02920-62921-21100-00074-7

McDonald's Restaurant #6035
 777 MEADOW ST
 CHICOPEE, MA 01013
 TEL# 413 592 5345

****** REFUND ******

KS# 2 06/29/2021 09:10 PM
 Order 92

1 Filet-O-Fish	5.39
ONLY 2 Half Strips Bacon	1.59
Subtotal	6.98
Tax	0.49
Total Refund	7.47
Change	0.00

Authorized
 Signature: _____

Address _____

Phone # _____

Reason _____

MyMcDonald's Reward Member?
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 Please call (888) 275-5591

265

BUY ONE GET ONE FREE QUARTER POUNDER
 W/CHEESE OR EGG MCMUFFIN
 Go to www.mcdvoice.com within 7 days
 and tell us about your visit.
 Validation Code: _____
 Expires 30 days after receipt date.
 Valid at participating US McDonald's.
 Survey Code:
 06035-02650-62921-18375-00169-6

McDonald's Restaurant #6035
 777 MEADOW ST
 CHICOPEE, MA 01013
 TEL# 413 592 5345

KS# 2 06/29/2021 06:37 PM
 Order 65

2 M French Fries	7.58
1 Filet-O-Fish	5.39
ONLY 2 Half Strips Bacon	1.59
1 2 Pack of Cookies	1.29
2 Choc Chip Cookie	

Subtotal	15.85
Tax	1.11
Take-Out Total	16.96

Cashless	16.96
Change	0.00

MER# 499940
 CARD ISSUER ACCOUNT#
 Visa SALE *****6778
 TRANSACTION AMOUNT 16.96
 CHIP READ
 AUTHORIZATION CODE - 523139
 SEQ# 029681
 AID: A000000980840

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Exhibit A



Exhibit B