

November 23, 2024

BY POSTAL MAIL

Owner
Zanzibar Fair Trade
1315 Broadway
Sacramento, CA 95818

Re: Discriminatory Blue LED Lights

Dear Owner,

I have been diagnosed with autism spectrum disorder which is a qualified disability under the Americans with Disabilities Act. On July 17, 2024, I notified Zanzibar that the blue LED light in the store window at 1315 Broadway in Sacramento interfered with my path-of-travel and requested that the discriminatory blue LED light be turned off. On October 22, 2024, I was again traveling on Broadway, and again I encountered the blue LED light discriminatory barrier in the Zanzibar storefront window and notified Zanzibar Fair Trade via email. On November 23, 2024, I encountered the discriminatory blue LED flashing light a third time. This letter outlines the steps that I will take moving forward.

Step 1: In-person notification. No cost to you.

Step 2: Email notification. No cost to you.

Step 3: Postal mail notification. No cost to you.

Step 4: Pre-litigation offer to settle for \$2,000.

Step 5: File discrimination lawsuit; Offer to settle for \$4,000 per incident.

Step 6: Discovery and trial. Estimated cost to you \$50,000 plus damage award.

I have contacted other businesses about similar blue LED lights. In all cases, the blue LED lights have been removed or turned off. The following is the list of businesses that I have contacted regarding blue LED lights.

- NAPA Auto Parts – Turned off the blue LED lights on an in-store video surveillance system after one email.
- Best Buy – Turned off the blue LED lights on the LVT video surveillance system for all Best Buy stores across the entire country after a few email communications.

- Target - Turned off the blue LED lights on a video surveillance system for a Target store in Sacramento, California after a few email communications. This store is directly across from Zanzibar on Broadway.
- Engstrom Properties – Turned off the blue LED lights on an LVT video surveillance system after a few email communications.
- Klassen Smith Construction – Turned off the blue LED lights on an LVT video surveillance system after a few email communications.
- Petrovich Development Company – Turned off the blue LED lights on one LVT system and removed a second LVT system entirely after I filed a discrimination lawsuit. Estimated cost to PDC of lawsuit so far is \$30,000 and continuing.
- Woodland Development Company – Turned off the blue LED lights after I filed a lawsuit. WDC was recently added as a defendant to the PDC lawsuit.
- Woodland Development Company II – Turned off the blue LED lights after I filed a lawsuit. WDC II was recently added as a defendant to the PDC lawsuit.
- Regency Centers – Removed the LVT system entirely after I filed a discrimination lawsuit.
- Schottenstein Property Group – Turned off the blue LED lights after initial Deliberate Indifference and multiple communications. Currently in negotiations for settlement amount.
- Ulta Salon, Cosmetics, and Fragrances, Inc. – Turned off the blue LED lights after I filed a discrimination lawsuit. Settled the case for \$4,000. Ulta admits no wrongdoing. The settlement agreement is not confidential.
- Zanzibar Fair Trade – Acted with Deliberate Indifference to in-person request and email notifications and continues to operate the blue LED light in the store window.

We are at Step 3 for Zanzibar Fair Trade. I request that Zanzibar Fair Trade turn off the discriminatory blue LED light in the front window within 14 days and notify me via email, or I will proceed to Step 4.

Sincerely,

/s/ Mark Baker

President

Soft Lights Foundation

mbaker@softlights.org