

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

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In the Matter of the Complaint of:

Verified Complaint

DANIELLE HAZEL,

Case No.

Complainant,

-against-

EKTA SAINI, an Individual; SANJEEV SAINI, an Individual; JULIA MORLEY, an Individual; MISS WORLD AMERICA LLC, a Limited Liability Company; and MISS WORLD HOLDINGS LIMITED, a Foreign Corporation,

Respondents.

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COMPLAINANT DANIELLE HAZEL, BY AND THROUGH HER ATTORNEYS OF RECORD, HEREBY BRINGS THIS VERIFIED COMPLAINT AGAINST THE ABOVE-NAMED RESPONDENTS:

1. Complainant Danielle Hazel (“Ms. Hazel”) is an individual who resides in Brooklyn, New York. At all relevant times, Ms. Hazel was a permanent resident of Brooklyn, New York.

2. Ms. Hazel is informed and believes, and based thereon alleges, that Respondents Ekta Saini and Sanjeev Saini are each individuals residing in Washington state and are the co-owners of Respondent Miss World America, LLC, which is incorporated in Washington state. Ms. Hazel is further informed and believes that Ekta Saini is the Chief Executive Officer of Respondent Miss World America, LLC. Ms. Hazel is informed and believes that Respondent Miss World America, LLC is the national franchisee and operator of the Miss World America nationwide pageant and directs local and/or state-level pageants throughout the country, including in New York state.

3. Ms. Hazel is informed and believes that Respondent Miss World Holdings Limited

is a foreign corporation registered in London, England. She is informed and believes that Respondent Miss World Holdings Limited is owned and operated by Respondent Julia Morley, an individual residing in London, England. She is further informed and believes that Respondent Miss World Holdings Limited is the international owner and operator which directs approximately 100 national franchisees, including Miss World America, LLC.

4. The Miss World pageant enterprise encourages people from around the United States, including in New York State, to apply to “become a Miss World America State Titleholder” to participate in the Miss World America national pageant. (See e.g., <https://www.missworldamerica.org/contestants>; and <https://www.missworldamerica.org/> (“We had 61 titleholders from all 50 states.”)).

5. Miss World America hosts its own national pageant, the winner of which may then represent the United States to compete for the grand title at the Miss World international pageant. In addition, the winner of Miss World America receives a prize package they value at \$250,000. Competitors also get to “acquire life long (sic) skills, grow their networks with like-minded women, get to cultivate their interview skills, style, and grow their community involvement.” (<https://www.missworldamerica.org/>). All contestants, regardless of whether they win at the national level receive a smaller prize package and the opportunity to network with other members and gain experience interviewing, presenting themselves, and presenting their involvement in charitable platforms.

6. For many people, including Ms. Hazel, the experience of entering the pageant and competing in it is an end in itself.

7. However, Miss World America’s website has the following eligibility requirements: “You must meet all criteria as shown below . . . [Be a] female who is unmarried, has no children and not pregnant.” (<https://www.missworldamerica.org/competition-rounds>). Attached hereto as Exhibit A is a true and correct copy of this discriminatory entry requirement.

8. Therefore, all mothers (biological, adoptive, or even by marriage) are banned from participating in the pageant at any level (local, state, and national levels).

9. This discrimination is continuing and ongoing, and as of the date of completing this intake, the discriminatory rule remains on the Miss World America website.

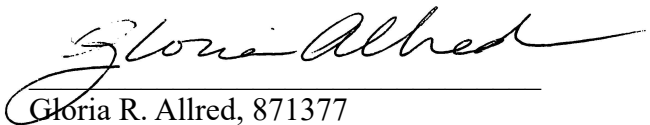
10. Despite satisfying all of the other entry requirements to enter the Miss World pageants, Ms. Hazel is rendered ineligible to enter because she has a son who is her legal dependent.

11. Knowing that she is ineligible because of this facially discriminatory rule, as clearly displayed on their website, Ms. Hazel has been deterred from entering the pageant. This has occurred on a continuous and ongoing basis from in or about 2019 to the present.

12. As a result of the discriminatory rules, she has been deprived of an opportunity that was extremely meaningful to her. She was not merely interested in fame or in prizes, but also dreamt of having the unparalleled charitable platforms Miss World provides. In addition, this exclusion is degrading to her, as it is based upon the antiquated stereotype that women cannot be both a mother and be beautiful, poised, passionate, talented, and philanthropic.

1. Ms. Hazel has not previously filed any other civil or administrative action with respect to the underlying facts of this Complaint.

Respectfully Submitted,



Gloria R. Allred, 871377

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Dated: September 14, 2024

EXHIBIT A

competition eligibility rounds



The poster features a photograph of Victoria Disorbo, Miss World America, on the left. She is wearing a crown and a sash that reads "MISS WORLD AMERICA". The background is a gradient of green and yellow. On the right, the Miss World America logo is at the top, followed by the text "MISS WORLD AMERICA" and "ELIGIBILITY REQUIREMENTS". Below this, a box states "YOU MUST MEET ALL CRITERIA AS SHOWN BELOW:". A list of requirements follows, and contact information is at the bottom.

MISS WORLD AMERICA
ELIGIBILITY REQUIREMENTS

YOU MUST MEET ALL CRITERIA AS SHOWN BELOW:

- ▲ AGE 17 - 26, AS OF November 2024
- ▲ BE A UNITED STATES CITIZEN
- ▲ A FEMALE WHO IS UNMARRIED, HAS NO CHILDREN AND NOT PREGNANT.
- ▲ NO HEIGHT OR WEIGHT REQUIREMENT

VICTORIA DISORBO

APPLY TODAY AT [Missworldamerica.org](https://www.missworldamerica.org)

info@missworldamerica.org
Ektasaini@missworldamerica.org

You can. You are capable. You are worthy.
You are enough. Your voice matters.

Screenshot of <https://www.missworldamerica.org/competition-rounds>, captured September 13, 2024.

VERIFICATION

DANIELLE HAZEL, being duly sworn, deposes and says:

I am the Complainant in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

DANIELLE HAZEL, COMPLAINANT

Sworn before me this __ day of September, 2024.

NOTARY PUBLIC

VERIFICATION

DANIELLE HAZEL, being duly sworn, deposes and says:

I am the Complainant in the above-entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters I believe them to be true.

Danielle Hazel

DANIELLE HAZEL, COMPLAINANT

Sworn before me this 14th day of September, 2024.

Brandon M Rivera

NOTARY PUBLIC

Brandon M Rivera
Notary Public State of New York
No. 01R16415838
Commission Expires 03/29/2025