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FILED  
TULARE COUNTY SUPERIOR COURT  
VISALIA DIVISION

JUL 30 2020

STEPHANIE CAMERON  
BY: NICOLE HENDERSON

File By Fax

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF TULARE

JUVENAL GAONA VARGAS, as an  
individual and on behalf of all others similarly  
situated,

Plaintiff,

vs.

BEN GLEZ, INC., a California corporation;  
WMJ FARMS, INCORPORATED, a  
California corporation; and DOES 1 through  
100,

Defendants.

Case No.: VCU282277

FIRST AMENDED CLASS AND  
REPRESENTATIVE ACTION  
COMPLAINT:

- (1) MINIMUM WAGE VIOLATIONS  
(LABOR CODE §§ 1182.12, 1194,  
1194.2, AND 1197);
- (2) FAILURE TO PAY ALL  
OVERTIME WAGES (LABOR  
CODE §§ 204, 510, 551, 552, 558,  
1194, AND 1198);
- (3) MEAL PERIOD VIOLATIONS  
(LABOR CODE §§ 226.7, 512);
- (4) REST PERIOD VIOLATIONS  
(LABOR CODE §§ 226.7, 516);
- (5) FAILURE TO REIMBURSE FOR  
NECESSARY BUSINESS  
EXPENSES (LABOR CODE § 2802);
- (6) FAILURE TO PROVIDE  
ACCURATE, ITEMIZED WAGE  
STATEMENTS (LABOR CODE  
§ 226 *et seq.*);
- (7) WAITING TIME PENALTIES  
(LABOR CODE §§ 201-203);
- (8) UNFAIR COMPETITION (BUS &  
PROF CODE § 17200 *et seq.*); AND
- (9) CIVIL PENALTIES UNDER THE  
PRIVATE ATTORNEYS GENERAL  
ACT (LABOR CODE § 2698 *et seq.*).

DEMAND FOR JURY TRIAL  
UNLIMITED CIVIL CASE