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6 *& Proposed Class Members*

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF SACRAMENTO**

10 JAMES GREGORY CONQUEST and ILANA
RAMOS individually and on behalf of all
11 others similarly situated,

12 Plaintiffs,

13 v.

14 TRIPLE CANOPY, INC.; CONSTELLIS
INTEGRATED RISK MANAGEMENT
15 SERVICES, INC.; TRIPLE CANOPY – A
CONSTELLIS COMPANY; and DOES 1-50,
16 inclusive,

17 Defendants.

CLASS & REPRESENTATIVE ACTION

**DECLARATION OF ILANA RAMOS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND FOR THE REQUESTED
SERVICE AWARD**

Date: FEBRUARY 2, 2024

Time: 9:00 a.m.

Dept.: 28

Judge: Hon. Lauri A. Damrell

Trial Date: Not set

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1 I, ILANA RAMOS, declare as follows:

2 1. I am one of the Proposed Class and Collective Representatives in the above-entitled
3 action. The matters stated herein are known to me based upon my own personal knowledge except as
4 otherwise stated.

5 2. This declaration¹ is submitted in support of Plaintiffs' Motion for Preliminary Approval
6 of Class Action Settlement and in support of the requested Service Award in the amount of \$10,000 as
7 part of that Settlement in the above-entitled matter.

8 3. I worked for the above-named Defendants as an armed security guard from
9 approximately March of 2018 until June 2021. When I started the company was called Triple Canopy
10 but during my employment they changed to Constellis. I was employed as an armed security guard in
11 the North Bay (Oakland) area in multiple locations and buildings including at the U.S. Courthouse,
12 Ronald V. Dellums Federal Building, in Oakland.

13 4. While I was employed by Defendants, I came to believe that I, and all other employees
14 holding my position, were not being treated fairly under the California Labor laws. I agreed to act as a
15 representative in what I understand is called a collective action for myself and all other aggrieved
16 employees in my position and on behalf of the State of California in what I understand is called a
17 Private Attorney General Act (PAGA) complaint. I was and am concerned that by acting as a
18 representative in this case, and putting my name on the public record, it may have negative impact on
19 my future employment with other companies and other potential negative consequences, but I believe
20 it is important to be willing to stand up for myself and my fellow employees. I have worked with the
21 attorneys at the Clark Law Group in every way I was asked to help with this case.

22 5. Some of the things I have done in working with counsel is reviewing and discussing
23 documents from my personal file and other documents produced by Defendants. I have communicated
24 with other employees and provided information with my lawyers. I have participated in numerous
25 meetings remotely with my lawyers. I have discussed Defendants' assertions, arguments, and
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27 ¹ This declaration incorporates by reference the definitions set forth in the Settlement Agreement. To
28 the extent the terms are defined in the Settlement Agreement, all defined terms contained herein shall
have the same meaning as set forth in the Settlement Agreement.

1 defenses. I spent significant time searching for employment-related documents which I provided to
2 my attorneys. I was involved remotely, with my attorneys, in the mediation of this case which resulted
3 in the settlement that is now before this Court. I have reviewed the settlement documents, signed the
4 settlement agreement, and done everything I could to support Plaintiffs' Counsel. I also worked with
5 my attorneys in preparing and remotely signing this Declaration.

6 6. I estimate that I spent approximately 40 hours working with my attorneys to litigate this
7 case.

8 7. I know this Honorable Court is aware that I not only acted as a Representative in this
9 collective action but that I had individual issues which I agreed to settle independently and individually
10 during the mediation process. First, I represent to this Court that I always understood that my primary
11 responsibility in this case was as a Representative for all Aggrieved Employees and as a
12 Representative for the State of California for Labor Code Violations. I understood at the time of the
13 Mediation that as part of the collective settlement, as a named Representative Party to this case, I
14 would be required to sign a Settlement Agreement which would waive all my rights to any individual
15 damages whether known or unknown. (I understand this is called a 1542 Release clause.) So, it was
16 important to address my individual issues as part of the settlement process. But I do want this Court to
17 know about my individual issues with Defendants, so the following is a description of that.

18 8. During 2020, I was employed as an armed security guard in the U.S. Courthouse and
19 Federal Building in downtown Oakland, California. In May of 2020, there was a period of social
20 protests, including violent acts, in the United States and in Oakland. The protests and riots during this
21 time happened after the death of George Floyd. I was not working on May 29, 2020, but when I
22 returned to work shortly thereafter, I was told that a good friend and co-worker, Dave Patrick
23 Underwood, was murdered in a drive by shooting. My supervisor took me to a media room and
24 required me to watch multiple security camera videos of the murder. This was extremely emotionally
25 traumatizing to me. After being forced to watch those videos, I continued to suffer from various forms
26 of emotional distress and anxiety which was exacerbated if I worked in that Oakland location as an
27 armed security guard. I met with an anxiety counselor approximately 8 or 9 times and a psychiatrist
28 twice. I asked my employer for an accommodation where I could continue to work as a security guard

1 in a position where I did not have to carry a gun. I was eventually offered a position in Sacramento
2 (over two hours commute from my home) for a significant cut in pay. Because of all this I was forced
3 to leave my job.

4 9. I have done all that I could to be a good and proper Representative for all employees in
5 California who worked for the Defendants in my same job description. I have spent many hours
6 working on gathering information and helping my lawyers in litigating this case. I understand my
7 lawyers are asking this Honorable Court to grant me an award of some compensation for my role as a
8 Representative and I understand that amount is \$10,000. I believe that is a fair amount for the work I
9 have put in and for the risks I took to act as a Representative.

10 10. I acknowledge and understand that by being the named Plaintiff in this lawsuit I have an
11 obligation to consider the interests of those I represent in the same way that I would consider my own
12 interests. I acknowledge and understand the duties of a class representative. I believe that I have
13 fulfilled my responsibilities to date, and I intend to continue to fulfill those responsibilities, to the best
14 of my ability, until the conclusion of this lawsuit.

15 11. By stepping forward, I took the risk that future employers may be reluctant to hire me
16 since my name is associated with this case and is part of the public record. I also risked being held
17 financially responsible in the event this lawsuit was unsuccessful.

18 12. To the best of my knowledge, I do not have any conflict of interests with any other class
19 member and will only receive my share of the settlement as well as any amount the Court awards me
20 as a Service Award.

21 13. I thank this Honorable Court for overseeing this case and appreciate the Judges
22 attention and consideration.

23 I declare under penalty of perjury under the laws of the state of California that the foregoing is
24 true and correct, and that this declaration was executed on this 25th day of December 2023 in San
25 Diego, California.

26 
Ilana Ramos (Dec 25, 2023 09:43 PST)

Ilana Ramos