

PAYTON EMPLOYMENT LAW, PC
CHANTAL M. PAYTON, ESQ. (SBN: 293215)
JOHNNY DARNELL GRIGGS, ESQ. (SBN: 110640)
3807 W. Sierra Highway, Suite 206
Acton, California 93510
Telephone: (661) 434-1144
Facsimile: (661) 434-1144
CPayton@PaytonEmploymentLaw.com
JGriggs@PaytonEmploymentLaw.com

*Attorneys for Plaintiff Franklin Boone, the putative class,
and Aggrieved Employees*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

NORMANDY VAMOS and FRANKLIN
BOONE, individuals; and on behalf of all others
similarly situated;

Plaintiffs,

v.

AMERICAN IDOL PRODUCTIONS, INC., a
California corporation; AMERICAN
BROADCASTING COMPANIES, INC., a
Delaware corporation; FREMANTLEMEDIA
NORTH AMERICA, INC., a California
corporation; INDUSTRIAL MEDIA, INC., a
California corporation; 19 ENTERTAINMENT,
INC., a New York corporation; DOES 1-10,
business entities, forms unknown; DOES 11-20,
individuals; and DOES 21-30, inclusive,

Defendants.

Case No.: 23STCV02514

**DECLARATION OF FRANKLIN BOONE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND
CERTIFICATION OF A SETTLEMENT
CLASS**

Date: May 27, 2025
Time: 10:00 a.m.
Dept.: 7
Judge: Hon. Samantha P. Jessner

Action Filed: February 3, 2023
Trial Date: Not Set

DECLARATION OF FRANKLIN BOONE

1. I, Franklin Boone, declare the following facts to be true and correct and if called as a witness would testify competently to the same.

2. I am a named Plaintiff in *Normandy Vamos and Franklin Boone v. American Broadcasting Companies, Inc et al.*, Los Angeles County Superior Court No. 23STCV02514 (the “Action”) and I submit this declaration in support of the Motion for Preliminary Approval of Class Action Settlement and Certification of a Settlement Class.

3. I am over the age of 18 and I am personally familiar with, and have personal knowledge of, the facts contained herein, which I could and would testify competently thereto.

4. I was a participant in the ABC Television Network show, “*American Idol*” which Defendants American Idol Productions, Inc.; American Broadcasting Companies, Inc.; Fremantlemedia North America, Inc.; Industrial Media, Inc.; and 19 Entertainment, Inc. (collectively, “Defendants”) produce(d) for TV and streaming distribution from approximately November 2019 through approximately at or around May 2020.

5. I accepted the opportunity to act as a Class Representative in the instant class action on behalf of other participants on Defendants’ shows whom I believed Defendants improperly classified as uncompensated volunteers rather than employees and subjected to labor law violations. Although presented with the opportunity, I did not pursue this case on an individual basis, and instead, did so as a class action so that I could help other participants recover for what I believed were Defendants’ unlawful practices.

6. I questioned Defendants’ policies of classifying the participants on *American Idol* as uncompensated volunteers as opposed to employees, failing to pay the participants overtime wages and minimum wages and failing to provide compliant meal and rest periods.

7. While acting as a Class Representative in this lawsuit, and throughout its course, I have put the interests of the class ahead of my own. I understood that I could possibly earn a modest enhancement payment if this case resolved favorably and realized that I could be responsible for Defendants’ attorneys’ fees and costs if it did not. This class action was based on various novel and creative theories on behalf of unpaid or underpaid individuals who participated in or worked on the creation of content

1 for the *American Idol* show, including but not limited to performing and singing, that have not been
2 litigated or tested in court prior to the resolution of this matter. As a Class Representative, like my
3 attorneys, I took on various risks associated with pursuing a matter of this nature where the ultimate
4 outcome of the case was uncertain. An unprecedented action necessarily adds risk and potential
5 exposure for the named Plaintiff above and beyond run of the mill wage and hour cases with extensive
6 precedent supporting the Plaintiff's position.

7 8. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and more
8 importantly, to put an end to what I believed were illegal practices on the part of Defendants. I decided
9 to take on the risk of pursuing this class action to take a stand on behalf of other participants, irrespective
10 of the potential personal cost to me, which would have been substantial in the event that this case ended
11 in a loss.

12 9. In voluntarily agreeing to bring this class action, I understood that my responsibilities as a Class
13 Representative, included, but were not limited to, adequately representing the class, protecting the
14 interests of the class, participating in litigation, maintaining communication with and cooperating with
15 my attorneys, and providing and preserving all evidence that might be necessary to the class claims in
16 this case.

17 10. I am satisfied with the outcome of this litigation, which resulted in Defendants compensating
18 class members for unpaid minimum wages, overtime wages, missed meal and rest periods, penalties,
19 and interest that I believe are owed under California law. Without my initiative in pursuing this case,
20 there would likely be no recovery and the statute of limitations for the alleged wage and hour claims
21 would have run and continued to run on the Class Members' claims, particularly because many of them
22 were unwilling or unaware of their rights and ability to recover unpaid wages and associated penalties.

23 11. Throughout this case, I spent considerable time communicating with my attorneys on phone
24 calls, in meetings, and via written communications, explaining the unique circumstances of this case,
25 including the events that transpired that compelled me to seek restitution. I also spent considerable time
26 documenting these events for future use.

27 12. During the course of this litigation, up through and following the settlement process, I remained
28 actively involved in the case, providing information to my attorneys, tracking the status of the case,

1 assisting my attorneys in preparation for the mediation, attending the entire mediation with my
2 attorneys, helping my attorneys to settle the case on a classwide/PAGA basis, reviewing the settlement
3 agreement, and participating as much as possible.

4 13. While I have not maintained contemporaneous detailed time records of my activities in
5 connection with this litigation, conservatively, I have spent in excess of 30 hours assisting my attorneys
6 with this case as described above.

7 14. Finally, I do have concerns that the fact that I pursued this lawsuit may result in reputational
8 harm to me. I believe I may be adversely affected when it comes to obtaining future employment since
9 employers who discover that I sued Defendants in a class action may avoid hiring me.

10 15. I am unaware of any conflicts that I could possibly have with other members of the class. My
11 interests in bringing the lawsuit – for Defendants to change their labor practices and compensate current
12 and former show participants – are aligned with those of all other class members.

13 16. For the reasons set forth above, I believe that the \$5,000.00 enhancement award that the parties
14 have agreed to (subject to court approval) pursuant to the Class Action and PAGA Settlement
15 Agreement for this matter is justified and appropriate.

16 17. I have reviewed this declaration and can confirm its accuracy.
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18 I declare under penalty of perjury under the laws of the State of California that the foregoing is
19 true and correct and that this declaration was executed in Los Angeles, California on
20 March 26, 2025.

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