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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JARMAR VINSON, on behalf of himself, the
State of California, and all Aggrieved
Employees,

Plaintiff,

vs.

NATIONAL SECURITY INDUSTRIES AND
SERVICES, INC.; and DOES 1 through 100,
Inclusive,

Defendants.

Case No. 23CV416392

REPRESENTATIVE ACTION

*[Assigned for all purposes to the Hon.
Theodore C. Zayner, Dept. 19]*

**DECLARATION OF JARMAR VINSON
IN SUPPORT OF APPROVAL OF
SETTLEMENT OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: June 18, 2025
Time: 1:30 p.m.
Dept.: 19

Complaint Filed: May 12, 2023
Trial date: None Set

DECLARATION OF JARMAR VINSON

I, JARMAR VINSON, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter against National Security Industries and Services, Inc. ("Defendant"). This declaration is submitted in support of approval of the proposed settlement of claims brought under the Private Attorneys General Act ("Settlement") reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a former employee of Defendant, where I worked as a non-exempt employee from approximately September 2021 until approximately March 2022. While working for Defendant, I believe that I was not paid all wages owed to me, that I was not provided accurate wage statements, and that I was not paid all wages owed to me at the end of my employment.

3. When I first discussed this case with my attorneys and agreed to move forward with this case, I understood that this lawsuit could benefit other Defendant employees by helping to recover penalties on their behalf. I knew that filing a lawsuit carries risk, including the risk of being responsible for Defendant's costs if the case were lost. But I accepted this risk because I wanted to vindicate my and other Defendant's employees' rights. Even though I understood that filing a lawsuit is a public record, I accepted that burden in order to help other employees.

4. I have been actively involved in this case since I first had discussions with my attorneys at Abramson Labor Group about a potential representative action back in February 2023. I have had many discussions with my attorneys throughout this case to discuss DHL's policies and practices, identify potentially helpful documents and witnesses, and discuss case strategy. I spent significant time searching my own documents, and I also spent time reviewing the Settlement and other documents with my attorneys. I estimate I have spent at least 30-35 hours on this case from the time I first spoke with my attorneys regarding this case until the present.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct, and this declaration was executed by me on 05/27/25.


Jarmar Vinson Sr. (May 27, 2025 13:58 PDT)
Jarmar Vinson