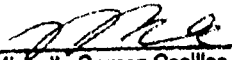


MAY 17 2023


BY: Michelle Gomez-Casillas, Deputy

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9 an individual, on behalf of herself and others similarly situated,

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO

CIV SB 2310932

YUDIT CUIEL, an individual, on behalf of
herself and others similarly situated,

Plaintiff,

vs.

MOTIVATIONAL MARKETING LLC, a
California Limited Liability Company;
VENSURE HR, INC., an Arizona corporation,
and, DOES 1 through 50, inclusive,

Defendants.

Case No. _____

CLASS ACTION COMPLAINT

1. Failure to Pay All Wages Including Minimum and Overtime Wages §§ 204, 206, 226.2, 226.8, 227.3, 510, 1182.12, 1194, 1194.2, 1197;
2. Failure to Provide Meal Periods in Violation of Labor Code §§ 226.7, 512 and Wage Order 5-2001, § 11;
3. Failure to Provide Rest Periods in Violation of Labor Code §§ 226.7 and Wage Order 5-2001, § 12;
4. Failure to Reimburse for Necessary Business Expenditures; Labor Code § 2802;
5. Failure to Provide Accurate Itemized Wage Statements in Violation of Labor Code §§ 226, 226.3, and 1174;
6. Failure to Waiting Time Penalties in violations of Labor Code §§ 201, 202, 203;
7. Unfair Business Practices in Violation of Cal. Bus. & Prof Code §§ 17200, *et seq.*

DEMAND FOR JURY TRIAL

RECEIVED
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COUNTY OF SAN BERNARDINO

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Aradelsi Rizo