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10 Attorneys for Plaintiff Ramzeddeen Fardan, individually,
11 and on behalf of all others similarly situated.

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF SAN BERNARDINO**

14 RAMZEDDEEN FARDAN, individually
15 and on behalf of all others similarly
16 situated,

17 Plaintiffs,

18 v.

19 AMERICAN GLOBAL SECURITY, INC.;

20 and DOES 1 through 20, inclusive,

21 Defendants.

Case No. CIVSB2320475

*Assigned for All Purposes to:
Judge Brian S McCarville; Dept. S30*

**[Amended as a matter of right, pursuant to
Labor Code section 2699.3(a)(2)(C)]**

**FIRST AMENDED CLASS ACTION
COMPLAINT FOR:**

1. Failure to Pay Minimum Wages;
2. Failure to Pay Overtime Wages;
3. Failure to Provide Meal Periods;
4. Failure to Permit Rest Breaks;
5. Failure to Provide Accurate Itemized Wage Statements;
6. Failure to Pay Wages Timely During Employment;
7. Failure to Pay All Wages Due Upon Separation of Employment;
8. Violation of Business and Professions Code §§ 17200, *et seq.*; and
9. Enforcement of Labor Code § 2698 *et seq.* ("PAGA")

1 Plaintiff Ramzeddeen Fardan, individually and on behalf of others similarly situated,
2 alleges as follows:

3 **NATURE OF ACTION AND INTRODUCTORY STATEMENT**

4 1. Plaintiff Ramzeddeen Fardan (“Plaintiff”) brings this putative class action and
5 representative action pursuant to the Private Attorneys General Act of 2004, Cal. Lab. Code. §
6 2698 *et seq.*, against defendants American Global Security, Inc., and DOES 1 through 20,
7 inclusive (collectively, “Defendants”), on Plaintiff’s own behalf and on behalf of California
8 citizens who are and were employed by Defendants as non-exempt employees throughout
9 California.

10 2. Defendants provide services or goods throughout California.

11 3. Through this action, Plaintiff alleges that Defendants engaged in a systematic
12 pattern of wage and hour violations under the California Labor Code and Industrial Welfare
13 Commission (“IWC”) Wage Orders, all of which contribute to Defendants’ deliberate unfair
14 competition.

15 4. Plaintiff is informed and believe, and thereon alleges, that Defendants have
16 increased their profits by violating state wage and hour laws by, among other things:

- 17 (a) failing to pay all wages (including minimum wages and overtime wages);
- 18 (b) failing to provide lawful meal periods or compensation in lieu thereof;
- 19 (c) failing to authorize or permit lawful rest breaks or provide compensation
20 in lieu thereof;
- 21 (d) failing to provide accurate itemized wage statements;
- 22 (e) failing to pay wages timely during employment; and
- 23 (f) failing to pay all wages due upon separation of employment.

24 5. Plaintiff seeks monetary relief against Defendants on behalf of Plaintiff and all
25 others similarly situated in California to recover, among other things, unpaid wages, benefits,
26 interest, attorneys’ fees, costs and expenses, and penalties pursuant to Labor Code §§ 201, 201.3,
27 202, 203, 204, 210, 226, 226.3, 226.7, 510, 512, 558, 1174, 1174.5, 1182.12, 1194, 1194.2, 1197,
28 1197.1, 1198, 2698, *et seq.*, and Code of California Civil Procedure § 1021.5.