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3 **LAW OFFICE OF JUSTIAN JUSUF, APC**
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5 Attorney for Plaintiff SALAH DIN FARUKH,
6 individually and on behalf of others similarly situated

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
07/28/2026

By: M. Pipe Deputy

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SACRAMENTO**

10 Salahdin Farukh, individually and on behalf of)
11 others similarly situated,)

12 Plaintiff,)

13 vs.)

14 National Security Industries, also known as)
15 National Security Industries And Services;
Michael Gerami; and Does 1-50,)

16 Defendants.)

CASE NO.: 26CV012473

CLASS ACTION

Assigned For All Purposes To:

Judge: Hon. Laurie A. Damrell

Dept.: 8B

**FIRST AMENDED COMPLAINT FOR
DAMAGES, CIVIL PENALTIES AND
INJUNCTIVE RELIEF**

**1) Failure To Provide Accurate Wage
Statements**

**2) PAGA – Failure To Provide Accurate
Wage Statements**

Complaint Filed: May 22, 2026

1 Plaintiff SALAH DIN FARUKH (“Plaintiff”) alleges as follows:

2 **PARTIES**

3 1. Defendant NATIONAL SECURITY INDUSTRIES, also known as NATIONAL
4 SECURITY INDUSTRIES AND SERVICES (“NATIONAL”) is a business organization, form
5 unknown.

6 2. Defendant MICHAEL GERAMI (“GERAMI”) is a natural person.

7 3. Plaintiff is unaware of the true names, capacities, relationships, and extent of
8 participation in the conduct alleged herein, of the defendants sued as DOES 1 to 50, but is
9 informed and believes and thereon alleges that said defendants are legally responsible for the
10 wrongful conduct alleged herein and therefore sues these defendants by such fictitious names.
11 Plaintiff will amend this complaint when their true names and capacities are ascertained.

12 4. Each defendant, directly or indirectly, or through agents or other persons, employed
13 Plaintiff and other members of the class, and exercised control over their wages, hours, and
14 working conditions. Each defendant acted in all respects pertinent to this action as the agent of the
15 other defendants, carried out a joint scheme, business plan or policy in all respects pertinent
16 hereto, and the acts of each defendant are legally attributable to the other defendants.

17 **ALTER EGO ALLEGATIONS**

18 5. Plaintiff is informed and believes and thereon alleges that at all times relevant to
19 this action, Defendant GERAMI is the owner of Defendant NATIONAL.

20 6. Plaintiff is informed and believes and thereon alleges that at all times relevant to
21 this action, NATIONAL is the alter ego of GERAMI who (a) controlled and dominated the
22 business and affairs of NATIONAL, (b) commingled the funds and assets of the entity with his
23 personal funds and assets, (c) diverted corporate funds and assets for his own personal use, (d)
24 failed to maintained minutes and adequate corporate records, (e) failed to adhere to corporate
25 formalities, (f) inadequately capitalized the corporate entity, (g) held himself out as personally
26 liable for the debts of the entity, (h) used the corporate entities as mere shells, instrumentalities, or
27 conduits, (i) manipulated the assets and liabilities between the corporate entities, and/or (j) used
28 corporate entities to conceal his ownership and financial interests.

7. Plaintiff is informed and believes and thereon alleges that at all times relevant to this action, there was a unity of interest and ownership between Defendants NATIONAL and GERAMI such that the separate personalities of NATIONAL and GERAMI does not in reality exist, and the adherence to the fiction of the separate existence of Defendants NATIONAL and GERAMI would result in inequity and injustice.

GENERAL ALLEGATIONS

8. Defendants are in the business of providing security guard and related services, employing approximately 400 hourly-paid employees in California. Plaintiff was one of the employees.

CLASS ACTION ALLEGATIONS

9. Plaintiff brings this action on behalf of himself and all other similarly situated current and former employees of Defendants as a class action pursuant to Section 382 of the Code of Civil Procedure. Plaintiff seeks to represent the following Class of current and former employees, currently defined as follows:

Any and all individuals who have been employed by Defendants, or each of them, as hourly-paid employees in California at any time during the applicable statute of limitations period.

10. Plaintiff reserves the right under California Rule of Court 3.765(b) and other applicable law to amend or modify the class definitions with respect to issues or in any other ways.

11. Plaintiff is a member of and the named representative of the Class.

12. There is a well-defined community of interest in the litigation.

13. Numerosity. The members of the Class are so numerous that individual joinder of all of them as plaintiffs is impracticable. While the exact number of the Class members is unknown to Plaintiff at this time, Plaintiff estimates there are approximately 500 Class members.

14. Commonality. Common questions of law and fact exist as to all Class members and predominate over any questions that affect only individual members of the Class. These common questions include, but are not limited to:

- 1 a) Whether Defendants furnished Plaintiff and other employees wage
2 statements that complied with the requirements of Labor Code Section 226(a).
3 b) If not, whether the failure to provide compliant wage statements “knowing
4 and intentional” within the meaning of Labor Code Section 226(e).
5 c) Whether injunctive relief is appropriate to ensure Defendants’ compliance
6 with the requirements of the Labor Code.

7 15. Typicality. Plaintiff’s claims are typical of the claims of the other members of the
8 Class. The claims asserted by Plaintiff can be asserted by members of the Class.

9 16. Adequacy. Plaintiff will adequately and fairly protect the interests of the members
10 of the Class. Plaintiff has no interest adverse to the interests of absent Class members. Plaintiff is
11 represented by attorneys who have substantial class action experience in wage-and-hour laws.

12 17. Superiority. A class action is superior to other available means for fair and
13 efficient adjudication of the claims of the Class and would be beneficial for the parties and the
14 court. Class action treatment will allow a large number of similarly situated persons to prosecute
15 their common claims in a single forum, simultaneously, efficiently, and without the unnecessary
16 duplication of effort and expense that numerous individual actions would require. The damages
17 suffered by each Class member are relatively small in the sense pertinent to class action analysis,
18 and the expense and burden of individual litigation would make it extremely difficult or
19 impossible for the individual Class members to seek and obtain individual relief. A class action
20 will serve an important public interest by permitting such individuals to effectively pursue
21 recovery of the sums owed to them. Further, class litigation prevents the potential for inconsistent
22 or contradictory judgments raised by individual litigation.

23 **FIRST CAUSE OF ACTION**

24 **FAILURE TO PROVIDE ACCURATE WAGE STATEMENTS**

25 **(Class Action Against All Defendants)**

26 18. Plaintiff incorporates the preceding paragraphs.

27 19. Labor Code Section 226(a) provides in relevant part that “An employer,
28 semimonthly or at the time of each payment of wages, shall furnish to his or her employee, either

1 as a detachable part of the check ... paying the employee's wages, or separately if wages are paid
2 by personal check or cash, an accurate itemized statement in writing showing ... (9) all applicable
3 hourly rates in effect during the pay period and the corresponding number of hours worked at each
4 hourly rate by the employee”

5 20. Defendants paid Plaintiff and other hourly-paid employees certain wages in lieu of
6 benefits, but failed to show on their wage statements the applicable hourly rates in effect for those
7 wages during the pay period and the corresponding number of hours worked at each hourly rate by
8 the employee, in violation of Labor Code Section 226(a)(9).

9 21. The failure to provide compliant wage statements was “knowing and intentional”
10 within the meaning of Labor Code Section 226(e).

11 22. Plaintiff and other employees have suffered “injury” within the meaning of Labor
12 Code Section 226(e), entitling them to the remedy provided in the statute.

13 **PAGA ALLEGATIONS**

14 23. Plaintiff incorporates the preceding paragraphs.

15 24. Pursuant to Labor Code section 2699.3, on May 11, 2026, Plaintiff gave the Labor
16 and Workforce Development Agency (“LWDA”) written notice of claims for civil penalties under
17 the Labor Code Private Attorneys General Act (“PAGA”), a copy of which (along with the
18 postage receipts) is attached hereto as **Exhibit A** and incorporated fully herein by this reference.

19 25. The 65-day period prescribed by Labor Code section 2699.3, within which the
20 LWDA must decide whether to open its own investigation expired as of July 26, 2026. To date,
21 the LWDA has provided no notice of its intention to open its own investigation. Pursuant to
22 PAGA, Plaintiff is therefore authorized to seek civil penalties and other relief provided in PAGA.

23 **SECOND CAUSE OF ACTION**

24 **PAGA - FAILURE TO PROVIDE ACCURATE WAGE STATEMENTS**

25 **(Representative Suit Against All Defendants)**

26 26. Plaintiff incorporates the preceding paragraphs.

27 27. Defendants’ failure to provide accurate wage statements violated Labor Code
28 section 226(a).

28. Plaintiff and other aggrieved employees are entitled to recover civil penalties and all other relief available under PAGA.

P R A Y E R

WHEREFORE, Plaintiff on behalf of himself and all others similarly situated, pray for relief and judgment against Defendants, jointly and severally, as follows:

- A. For certification of this action as a class action;
- B. For appointment of Plaintiff as the representative of the Class;
- C. For appointment of counsel for Plaintiff as Class counsel;
- D. For statutory damages;
- E. For civil penalties and other relief under PAGA;
- F. For injunctive relief;
- G. For reasonable attorneys' fees;
- H. For costs of suit; and
- I. For such other relief the Court deems just and proper.

Dated: July 28, 2026

LAW OFFICE OF JUSTIAN JUSUF, APC

By:

Justian Jusuf

Attorneys for Plaintiff SALAH DIN
FARUKH, individually and on behalf of
others similarly situated

Exhibit A

LAW OFFICE OF JUSTIAN JUSUF

A PROFESSIONAL CORPORATION

17011 Beach Blvd., Suite 900 • Huntington Beach, California 92647

Phone (714) 274-9815

Email: jjusuf@jusuf-law.com

May 22, 2026

California Labor & Workforce Development Agency (Via Electronic Filing):

<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

Re: *Salahdin Farukh v. National Security Industries, also known as National Security Industries And Services; Michael Gerami*

To Whom It May Concern:

This office represents Salahdin Farukh (“Plaintiff”), a former employee of National Security Industries, also known as National Security Industries And Services and Michael Gerami (“Defendants”).

This letter is sent pursuant to Labor Code § 2699.3, for purposes of bringing a civil action by Plaintiff, on behalf of himself and all other similarly situated current and former employees of the Defendants (and potentially other defendants the identities of which are currently unknown to Plaintiff), against the Defendants, to seek civil penalties arising from various Labor Code violations discussed herein, as provided in the Labor Code Private Attorneys General Act (“PAGA”), codified at Labor Code § 2698, *et seq.*

Defendants are in the business of providing security guard and related services, employing approximately 400 hourly-paid employees in California (“Aggrieved Employees.”) Plaintiff was one of the Aggrieved Employees.

FAILURE TO PROVIDE ACCURATE WAGE STATEMENTS

Labor Code § 226(a) provides in relevant part:

An employer, semimonthly or at the time of each payment of wages, shall furnish to his or her employee, either as a detachable part of the check, draft, or voucher paying the employee’s wages, or separately if wages are paid by personal check or cash, an accurate itemized statement in writing showing ... (9) all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee

Defendants paid Plaintiff and other Aggrieved Employees certain wages in lieu of benefits, but failed to show on their wage statements the applicable hourly rates in effect for

those wages during the pay period and the corresponding number of hours worked at each hourly rate by the employee, in violation of Labor Code § 226(a)(9).

PAGA CLAIMS

Plaintiff intends to bring a civil action for civil penalties pursuant to the PAGA regarding the foregoing Labor Code violations.

Pursuant to Labor Code § 2699.3, if we do not receive a response within 65 calendar days of this notice that the LWDA intends to investigate these alleged violations, Plaintiff may commence a civil action to seek civil penalties under PAGA.

Plaintiff intends to seek civil penalties against all those persons who may be liable under Labor Code § 558(a), which provides for recovery of civil penalties against an “employer or other person acting on behalf of an employer.” Plaintiff also intends to seek civil penalties against all those persons who may be liable under Labor Code § 558.1(a), which imposes liability of an employer to any “other person acting on behalf of an employer.”

Very truly yours,

LAW OFFICE OF JUSTIAN JUSUF, APC

By: 

Justian Jusuf

COPY:

VIA CERTIFIED MAIL:

National Security Industries, also known as
National Security Industries And Services
940 Park Avenue
San Jose, CA 95126

Michael Gerami
940 Park Avenue
San Jose, CA 95126

9589 0710 5270 1684 4891 95

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- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage \$0.72

Total Postage \$10.42

Sent To

Street and Apt.

City, State, ZIP

National Security Industries, also
known as National Security
Industries And Services
940 Park Avenue
San Jose, CA 95126

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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Total Postage \$10.42

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Street and Apt.

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Michael Geram
940 Park Avenue
San Jose, CA 95126

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Estimated Delivery Date
Tue 05/26/2026

Certified Mail [®]			\$5.30
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Tracking #:
9589 0710 5270 1684 4891 95

Return Receipt			\$4.40
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Tracking #:
9590 9402 6276 0274 3369 50

Total			\$10.48
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First-Class Mail [®] Letter	1		\$0.78
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San Jose, CA 95126
Weight: 0 lb 0.60 oz
Estimated Delivery Date
Tue 05/26/2026

Certified Mail [®]			\$5.30
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Tracking #:
9589 0710 5270 1684 4891 88

Return Receipt			\$4.40
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Tracking #:
9590 9402 6276 0274 3369 43

Total			\$10.48
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Grand Total:			\$20.96
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Credit Card Remit			\$20.96
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Card Name: MasterCard
Account #: XXXXXXXXXXXX8086
Approval #: 03723C
Transaction #: 185
AID: A0000000041010 Contactless