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

10 CIERRA NEWSOM, on behalf of herself, the
11 State of California, and all Aggrieved
12 Employees,

13 Plaintiff,

14 vs.

15 CITY PRIVATE SECURITY INC., a
16 corporation; and DOES 1 through
100, inclusive

17 Defendants.
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Case No. 24STCV02386

*[Assigned for All Purposes to the Hon.
Theresa M. Traber, Dept. 1]*

**DECLARATION OF CIERRA NEWSOM
IN SUPPORT OF APPROVAL OF
REPRESENTATIVE PAGA ACTION
SETTLEMENT**

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I, CIERRA NEWSOM, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter against City Private Security Inc. (“CPS” or “Defendant”). This declaration is submitted in support of approval of the proposed PAGA settlement (“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 CPS, where I worked as a non-exempt security guard employee from approximately January 2023 through July 2023.

3. While working for CPS, I believe that I was not paid all of the overtime wages to which I was entitled, and that I did not receive all of my off-duty meal breaks or rest breaks. I also believe that I was not paid meal or rest period premium wages. I also believe that I was not reimbursed for the expenses I incurred during my employment. As a result, I understand that I was not provided accurate wage statements and was not paid all wages owed to me at the end of my employment.

4. 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 CPS employees by helping to recover unpaid wages and other penalties. I knew that filing a lawsuit carries risk, including the risk of being responsible for CPS's costs if the case were lost. But I accepted this risk because I wanted to vindicate my and other CPS employees' rights. Even though I understood that filing a lawsuit is a public record, I accepted that burden in order to help other CPS employees.

5. I have been actively involved in this case since I first had discussions with my attorneys at Abramson Labor Group about a potential representative lawsuit back in December 2023. I have had many discussions with my attorneys throughout this case to discuss CPS's policies and practices, identify potentially helpful documents and witnesses, and discuss case strategy. I also spent significant time searching my own documents. I also spent time reviewing the Settlement Agreement with my attorneys. I estimate that I have spent at least 40-45 hours on this case from the time I first spoke with my attorneys regarding this case until the present.

1 6. As part of the proposed Settlement, I understand that my attorneys will request
2 that the Court approve a service award of \$5,000 for my efforts on behalf of the Aggrieved
3 Employees. I believe this amount is reasonable based on the amount of time and effort I have
4 devoted to this case as well as the risks I have undertaken as the representative for the Aggrieved
5 Employees, as well as for my agreement to provide a full release of claims related to my
6 employment with CPS that extends beyond the release of claims applicable to other Aggrieved
7 Employees. My support of the Settlement is not conditioned on my receipt of the requested
8 service payment.

9 I declare under penalty of perjury under the laws of the state of California that the
10 foregoing is true and correct, and this declaration was executed by me on 09/04/2025.

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12 
13 Cierra Newsom (Sep 4, 2025 11:10:37 PDT)
14 **CIERRA NEWSOM**