

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BAIS YAAKOV OF SPRING VALLEY, on behalf of  
itself and all others similarly situated,

7:17 CV 3984

Plaintiff,

Complaint

-vs.-

Class Action

MAXIMUS, INC.,

Jury Demanded

Defendant.

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**COMPLAINT**

Plaintiff Bais Yaakov of Spring Valley, on behalf of itself and all others similarly situated, alleges as follows:

**INTRODUCTION**

1. Bais Yaakov of Spring Valley (“Plaintiff”) brings this action against Maximus, Inc. (hereinafter referred to as “Maximus” or “Defendant”) for violating the Telephone Consumer Protection Act, 47 U.S.C. § 227 (the “TCPA”) and N.Y. General Business Law (“GBL”) § 396-aa. Congress enacted the TCPA in 1991 to prevent the faxing of unsolicited advertisements to persons who had not provided express invitation or permission to receive such faxes. In addition, the TCPA and regulations promulgated pursuant to it prohibit the sending of unsolicited as well as solicited fax advertisements that do not contain properly worded opt-out notices. The New York legislature enacted GBL § 396-aa for similar purposes.

2. Upon information and belief, Defendant has caused to be sent out over five thousand (5,000) unsolicited and solicited fax advertisements for goods and/or

services without proper opt-out notices to persons throughout the United States within the applicable limitations period for the TCPA, which is four years. As a result, Defendant is liable to Plaintiff and the proposed Classes A and B of similarly situated persons under the TCPA.

3. Upon information and belief, Defendant has caused to be sent out thousands of fax advertisements for goods and/or services that were unsolicited and lacked proper opt-out notices to persons throughout New York state within the applicable limitations period for GBL §396-aa, which is three years. As a result, Defendant is liable to Plaintiff and the proposed Class C of similarly situated persons under GBL § 396-aa.

#### **JURISDICTION AND VENUE**

4. This Court has federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 47 U.S.C. § 227.

5. Venue is proper in this judicial district under 28 U.S.C. § 1391(b)(2) because this is the judicial district in which a substantial part of the events or omissions giving rise to the claims in this case occurred. This Court also has supplemental jurisdiction, pursuant to 28 U.S.C. § 1367, over Plaintiff's and one of the Classes' claims under GBL § 396-aa.

#### **THE PARTIES**

6. Plaintiff is a New York religious corporation, with its principal place of business at 11 Smolley Drive, Monsey, New York 10952.

7. Upon information and belief, defendant Maximus, Inc. is a Virginia Corporation, with its principal place of business located at 1891 Metro Center Drive, Weston, Virginia 20190, and among other things, sells employee recruitment services.

**DEFENDANT’S ILLEGAL JUNK FAXES**

8. At all times relevant to this action, Plaintiff had telephone service at 845-356-3132 at its place of business at 11 Smolley Drive, Monsey, New York 10952. Plaintiff receives facsimile transmissions at this number, using a telephone facsimile machine.

9. Upon information and belief, from October 8, 2013 through January 20, 2016, Defendant, without Plaintiff’s express invitation or permission, arranged for and/or caused a telephone facsimile machine, computer, or other device to send at least 9 unsolicited fax advertisements (the “Fax Advertisements”) advertising the commercial availability or quality of any property, goods, or services, to Plaintiff’s fax machine located at 11 Smolley Drive, Monsey, New York 10952. Copies of the Fax Advertisements are attached as Exhibit A and incorporated into this Complaint.

10. Specifically, the Fax Advertisements advertised “MAXOutreach” which was described as “a free service the distributes job openings to organizations like yours—who help people find work.” Exhibit A. The Fax Advertisements instruct the recipients that “If you have any questions or have received this in error, please contact” and the Fax Advertisements then provide a telephone number, e-mail address and fax number for a MAXOutreach Service Representative.” Exhibit A. The Fax Advertisements also state that “[t]he employers listed in this fax are accepting applications for a variety of positions” and instruct the recipients to “[p]ost this information or notify anyone who is seeking employment.” Exhibit A.

11. In fact, contrary to the representations on the Fax Advertisements, the MAXOutreach service is a service that Defendant sells to employers for a fee. On its website, Defendant describes the MAXOutreach service as “the most revolutionary

recruitment and compliance solution for your business.” Accordingly, the Fax Advertisements served to advertise, were part of a marketing plan for advertising and served as pretext for advertising Defendant’s MAXOutreach services that were commercially available for a fee.

12. In addition, upon information and belief, to fully utilize MAXOutreach services, both potential employers and potential employees must create an online account with Defendant, and to do so, they must provide certain contact and other information to Defendant.

13. Upon information and belief, Defendant uses that information to contact the potential employers and employees to advertise other products or services that are commercially available from Defendant. Accordingly, for this reason also, the Fax Advertisements were part of a marketing plan for advertising and served as pretext for advertising Defendant’s services that were commercially available for a fee.

14. Plaintiff did not provide Defendant with express invitation or permission to send any fax advertisements. The Fax Advertisements were wholly unsolicited.

15. Upon information and belief, the Fax Advertisements contained a a purported opt-out notice that stated:

“If you have any questions or have received this in error, please contact,

**MAXOutreach Services Representative**  
Phone: 800-274-8582 extension 185  
Email: outreachcoordinator@maximus.com  
Fax 800-765-3370”

16. Thus, the Fax Advertisements violate numerous of the opt-out requirements of 47 U.S.C. § 227(b)(2)(D), 47 C.F.R. § 64.1200(a)(3)(iii), (iv) and GBL § 396-aa(2).

17. Upon information and belief, Defendant either negligently or willfully and/or knowingly arranged for and/or caused the Fax Advertisements to be sent to Plaintiff's fax machine.

18. Plaintiff suffered harm from Defendant sending it the Fax Advertisements in that the fax advertisements wasted Plaintiff's paper and toner, occupied Plaintiff's fax machine and fax telephone line, wasted Plaintiff's time and caused Plaintiff annoyance. Plaintiff also suffered harm and/or had a real risk of future harm because the Fax Advertisements failed to contain the information necessary for Plaintiff to effectively opt-out of receiving future fax advertisements from Defendant which would cause the harms described in the previous sentence of this paragraph.

19. Upon information and belief, Defendant has, from four years prior to the date of the filing of the Complaint in this action through the present, either negligently or willfully and/or knowingly sent and/or arranged to be sent well over five thousand (5,000) *unsolicited and/or solicited* fax advertisements advertising the commercial availability or quality of any property, goods, or services, to fax machines and/or computers belonging to thousands of persons all over the United States. Upon information and belief, those fax advertisements contained a notice identical or substantially similar to the Opt-Out Notice contained in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

20. Upon information and belief, Defendant has, from four years prior to the date of the filing of the Complaint in this action through the present, either negligently or willfully and/or knowingly sent and/or arranged to be sent well over five thousand (5,000) *unsolicited* fax advertisements advertising the commercial availability or quality of any property, goods, or services, to fax machines and/or computers belonging to

thousands of persons throughout the United States. Upon information and belief, those fax advertisements contained a notice identical or substantially similar to the Opt-Out Notice contained in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

21. Upon information and belief, Defendant has, from three years prior to the date of the filing of the Complaint in this action through the present, either negligently or willfully and/or knowingly sent and/or arranged to be sent thousands of *unsolicited* fax advertisements advertising the commercial availability or quality of any property, goods, or services, to fax machines and/or computers belonging to thousands of persons in New York. Upon information and belief, those fax advertisements contained a notice identical or substantially similar to the Opt-Out Notice contained in the Fax Advertisements Defendant or caused to be sent to Plaintiff.

### **CLASS ALLEGATIONS**

22. Plaintiff brings this class action on behalf of itself and all others similarly situated under rules 23(a) and 23(b)(1)-(3) of the Federal Rules of Civil Procedure.

23. Plaintiff seeks to represent three classes (the “Classes”) of individuals, each defined as follows:

Class A: All persons to whom, from four years prior to the date of the filing of the Complaint through the present, Defendant sent or caused to be sent at least one *solicited or unsolicited* facsimile advertisement advertising the commercial availability or quality of any property, goods, or services that contained a notice identical or substantially similar to the Opt-Out Notices in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

Class B: All persons to whom, from four years prior to the date of the

filing of the Complaint through the present, Defendant sent or caused to be sent at least one *unsolicited* facsimile advertisement advertising the commercial availability or quality of any property, goods, or services that contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

Class C: All persons in the State of New York to whom, from three years prior to the date of the filing of the Complaint through the present, Defendant sent or caused to be sent at least one facsimile advertisement without having obtained express invitation or permission to do so and/or which contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

24. Numerosity: The Classes are so numerous that joinder of all individual members in one action would be impracticable. The disposition of the individual claims of the respective class members through this class action will benefit the parties and this Court. Upon information and belief there are, at a minimum, thousands of class members of Classes A, B and C. Upon information and belief, the Classes' sizes and the identities of the individual members thereof are ascertainable through Defendant's records, including Defendant's fax and marketing records.

25. Members of the Classes may be notified of the pendency of this action by techniques and forms commonly used in class actions, such as by published notice, e-mail notice, website notice, fax notice, first class mail, or combinations thereof, or by other methods suitable to the Classes and deemed necessary and/or appropriate by the Court.

26. Typicality: Plaintiff's claims are typical of the claims of the members of

Class A because the claims of Plaintiff and members of Class A are based on the same legal theories and arise from the same unlawful conduct. Among other things, Plaintiff and members of Class A were sent or caused to be sent by Defendant at least one fax advertisement advertising the commercial availability or quality of any property, goods, or services which contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

27. Plaintiff's claims are typical of the claims of the members of Class B because the claims of Plaintiff and members of Class B are based on the same legal theories and arise from the same unlawful conduct. Among other things, Plaintiff and the members of Class B were sent or caused to be sent by Defendant, without Plaintiff's or the Class B members' express permission or invitation, at least one fax advertisement advertising the commercial availability or quality of any property, goods, or services which contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

28. Plaintiff's claims are typical of the claims of the members of Class C because the claims of Plaintiff and members of Class C are based on the same legal theories and arise from the same unlawful conduct. Among other things, Plaintiff and members of Class C were sent or caused to be sent by Defendant, without Plaintiff's or the Class C members' express permission or invitation, at least one fax advertisement advertising the commercial availability or quality of any property, goods, or services which contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff.

29. Common Questions of Fact and Law: There is a well-defined community of common questions of fact and law affecting the Plaintiff and members of the Classes.

30. The questions of fact and law common to Plaintiff and Class A predominate over questions that may affect individual members, and include:

(a) Whether Defendant's sending and/or causing to be sent to Plaintiff and the members of Class A, by facsimile, computer or other device, fax advertisements advertising the commercial availability or quality of any property, goods or services which contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff, violated 47 U.S.C. § 227(b) and the regulations thereunder;

(b) Whether Defendant's sending and/or causing to be sent such fax advertisements was knowing or willful;

(c) Whether Plaintiff and the members of Class A are entitled to statutory damages, triple damages and costs for Defendant's conduct; and

(d) Whether Plaintiff and members of Class A are entitled to a permanent injunction enjoining Defendant from continuing to engage in its unlawful conduct.

31. The questions of fact and law common to Plaintiff and Class B predominate over questions that may affect individual members, and include:

(a) Whether Defendant's sending and/or causing to be sent to Plaintiff and the members of Class B, without Plaintiff's or the Class B members' express invitation or permission, by facsimile, computer or other device, fax advertisements advertising the commercial availability or quality of any property, goods, or services which contained a notice identical or substantially similar to the Opt-Out Notice in the Fax Advertisements Defendant sent or caused to be sent to Plaintiff, violated 47 U.S.C. § 227(b) and the regulations thereunder;

(b) Whether Defendant's sending and/or causing to be sent to Plaintiff and the members of Class B such unsolicited fax advertisements was knowing or willful;

(c) Whether Plaintiff and the members of Class B are entitled to statutory damages, triple damages and costs for Defendant's conduct; and

(d) Whether Plaintiff and members of Class B are entitled to a permanent injunction enjoining Defendant from continuing to engage in its unlawful conduct.

32. The questions of fact and law common to Plaintiff and Class C predominate over questions that may affect individual members, and include:

(a) Whether Defendant's sending and/or causing to be sent to Plaintiff and the members of Class C, without Plaintiff's and Class C's express invitation or permission, by facsimile, computer or other device, fax advertisements advertising the commercial availability or quality of any property, goods, or services, violated GBL § 396-aa; and

(b) Whether Plaintiff and the members of Class C are entitled to statutory damages for Defendant's conduct.

33. Adequacy of Representation: Plaintiff is an adequate representative of the Classes because its interests do not conflict with the interests of the members of the Classes. Plaintiff will fairly, adequately and vigorously represent and protect the interests of the members of the Classes and has no interests antagonistic to the members of the Classes. Plaintiff has retained counsel who are competent and experienced in litigation in the federal courts, class action litigation, and TCPA cases.

34. Superiority: A class action is superior to other available means for the fair

and efficient adjudication of the Classes' claims. While the aggregate damages that may be awarded to the members of the Classes are likely to be substantial, the damages suffered by individual members of the Classes are relatively small. The expense and burden of individual litigation makes it economically infeasible and procedurally impracticable for each member of the Classes to individually seek redress for the wrongs done to them. The likelihood of the individual Class members' prosecuting separate claims is remote. Plaintiff is unaware of any other litigation concerning this controversy already commenced against Defendant by any member of the Classes.

35. Individualized litigation also would present the potential for varying, inconsistent or contradictory judgments, and would increase the delay and expense to all parties and the court system resulting from multiple trials of the same factual issues. The conduct of this matter as a class action presents fewer management difficulties, conserves the resources of the parties and the court system, and would protect the rights of each member of the Classes. Plaintiff knows of no difficulty to be encountered in the management of this action that would preclude its maintenance as a class action.

36. Injunctive Relief: Defendant has acted on grounds generally applicable to the members of Classes A and B, thereby making appropriate final injunctive relief with respect to Classes A and B.

**FIRST CLAIM FOR VIOLATION OF THE TCPA**

37. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-36.

38. By the conduct described above, Defendant committed more than five thousand (5,000) violations of 47 U.S.C. § 227(b) against Plaintiff and the members of Class A, to wit: the fax advertisements Defendant sent and/or caused to be sent to

Plaintiff and the members of Class A were either (a) unsolicited and did not contain a notice satisfying the requirements of the TCPA and regulations thereunder, or (b) solicited and did not contain a notice satisfying the requirements of the TCPA and regulations thereunder.

39. Plaintiff and the members of Class A are entitled to statutory damages under 47 U.S.C. § 227(b) in an amount greater than two million, five hundred thousand dollars (\$2,500,000).

40. If it is found that Defendant willfully and/or knowingly sent and/or caused to be sent fax advertisements that did not contain a notice satisfying the requirements of the TCPA and regulations thereunder to Plaintiff and the members of Class A, Plaintiff requests that the Court increase the damage award against Defendant to three times the amount available under 47 U.S.C. § 227(b)(3)(B), as authorized by 47 U.S.C. § 227(b)(3).

**SECOND CLAIM FOR VIOLATION OF THE TCPA**

41. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-32.

42. By the conduct described above, Defendant committed more than five thousand (5,000) violations of 47 U.S.C. § 227(b) against Plaintiff and the members of Class B, to wit: the fax advertisements Defendant sent and/or caused to be sent to Plaintiff and the members of Class B were unsolicited and did not contain notices satisfying the requirements of the TCPA and regulations thereunder.

43. Plaintiff and the members of Class B are entitled to statutory damages under 47 U.S.C. § 227(b) in an amount greater than two million, five hundred thousand dollars (\$2,500,000).

44. If it is found that Defendant willfully and/or knowingly sent and/or caused to be sent unsolicited fax advertisements that did not contain a notice satisfying the requirements of the TCPA and regulations thereunder to Plaintiff and the members of Class B, Plaintiff requests that the Court increase the damage award against Defendant to three times the amount available under 47 U.S.C. § 227(b)(3)(B), as authorized by 47 U.S.C. § 227(b)(3).

**THIRD CLAIM FOR INJUNCTIVE RELIEF**

45. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-32.

46. Defendant committed thousands of violations of 47 U.S.C. § 227(b).

47. Under 47 U.S.C. § 227(b)(3)(A), Plaintiff and the members of Classes A and B are entitled to an injunction against Defendant, prohibiting Defendant from committing further violations of the TCPA and regulations thereunder.

**FOURTH CLAIM FOR VIOLATION OF GBL § 396-aa**

48. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1-32.

49. By the conduct described above, Defendant committed numerous violations of GBL § 396-aa against Plaintiff and the members of Class C, to wit: the fax advertisements Defendant sent and/or caused to be sent to Plaintiff and the members of Class C were unsolicited and/or did not contain notices satisfying the requirements of GBL § 396-aa.

50. Pursuant to GBL § 396-aa, Plaintiff and the members of Class C are entitled to statutory damages in an amount to be determined at trial.

**REQUEST FOR RELIEF**

WHEREFORE, Plaintiff, on behalf of itself and the members of the Classes, requests:

A. An order certifying the Classes, appointing Plaintiff as the representative of the Classes, and appointing Aytan Y. Bellin of Bellin & Associates LLC as counsel for the Classes;

B. an award to Plaintiff and the members of Classes A and B of statutory damages in excess of \$2,500,000 for each of Classes A and B, pursuant to 47 U.S.C. § 227(b), for Defendant's violations of that statute and the regulations promulgated thereunder;

C. if it is found that Defendant willfully and/or knowingly sent and/or caused to be sent the fax advertisements alleged to classes A and/or B, an award of three times the amount of damages described in the previous paragraph, as authorized by 47 U.S.C. § 227(b)(3);

D. an injunction against Defendant prohibiting it from committing further violations of the TCPA and regulations described above;

E. an award to Plaintiff and the members of Class C of statutory damages of \$100 per violation of GBL § 396-aa in an aggregate amount to be determined at trial; and

F. such further relief as the Court deems just and proper.

**JURY DEMAND**

Plaintiff demands a trial by jury.

Dated: White Plains, New York  
May 25, 2017

**BAIS YAAKOV OF SPRING VALLEY  
ON BEHALF OF ITSELF AND ALL  
OTHERS SIMILARLY SITUATED**

By: /s/ Aytan Y. Bellin  
Aytan Y. Bellin  
Bellin & Associates LLC  
85 Miles Avenue  
White Plains, NY 10606  
(914) 358-5345  
Fax: (212) 571-0284  
aytan.bellin@bellinlaw.com

*Attorneys for Plaintiff and the Proposed  
Classes*

# EXHIBIT A

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 3

Contact: STUDENT JOB POSTINGS

***There are job openings available with employers  
in your immediate area!***

MAXOutreach is a free service that distributes job openings to organizations like yours—who help people find work. The employers listed in this fax are accepting applications for a variety of positions.

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**

Phone: 800-274-8582 extension 185  
Email: outreachcoordinator@maximus.com  
Fax: 800-765-3370

***Please post this information or notify anyone  
who is seeking employment.***

# MAXOutreach Job Openings

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

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Search using the Job Reference Code

Employer: **Sears Holding Corporation**

Job Title: **Merchandising and Pricing Associate**

City: **Nanuet** State: **NY** Zip Code: **10954**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=2165477>

Description: Responsible for providing excellent customer service,...

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Reference Code: **233543BR**

FEIN#: **361750680**

**MAXOutreach Job Openings**

**Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)**

Search using the Job Reference Code

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**

Phone: 800-274-8582 extension 185

Email: [Outreach3Coordinator@maximus.com](mailto:Outreach3Coordinator@maximus.com)

Fax: 800-765-3370

- End of Fax Transmission -

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 3  
Date: 10/22/2013

Contact: STUDENT JOB POSTINGS

***There are job openings available with employers  
in your immediate area!***

MAXOutreach is a free service that distributes job openings to organizations like yours—who help people find work. The employers listed in this fax are accepting applications for a variety of positions.

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: outreachcoordinator@maximus.com  
Fax: 800-765-3370

***Please post this information or notify anyone  
who is seeking employment.***

**MAXOutreach Job Openings**

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

Search using the Job Reference Code

Employer: **Reyes Holdings**

Job Title: **Driver Class-A #2**

City: **Harriman** State: **NY** Zip Code: **10926**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=2563953>

Reference Code: **121206**

FEIN#:

**Description:** Position Summary: Responsible for the safe operation...

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**MAXOutreach<sup>®</sup> Job Openings**

**Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)**

Search using the Job Reference Code

If you have any questions or have received this in error, please contact:

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Phone: 800-274-8582 extension 185  
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- End of Fax Transmission -

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Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 3  
Date: 11/28/2013

Contact: STUDENT JOB POSTINGS

***There are job openings available with employers  
in your immediate area!***

MAXOutreach is a free service that distributes job openings to organizations like yours—who help people find work. The employers listed in this fax are accepting applications for a variety of positions.

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**

Phone: 800-274-8582 extension 185  
Email: [outreachcoordinator@maximus.com](mailto:outreachcoordinator@maximus.com)  
Fax: 800-765-3370

***Please post this information or notify anyone  
who is seeking employment.***

**MAXOutreach Job Openings**

**Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)**

Search using the Job Reference Code

**Employer: Sears Holdings Corporation**

**Job Title: Tire/Battery Installer**

**City: Nanuet State: NY Zip Code: 10954**

**Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=3343082>**

**Description: Jobs in this category are responsible for providing...**

**Reference Code: 264781BR**

**FEIN#: 361750680**

**MAXOutreach Job Openings**

**Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)**

Search using the Job Reference Code

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: [Outreach3Coordinator@maximus.com](mailto:Outreach3Coordinator@maximus.com)  
Fax: 800-765-3370

- End of Fax Transmission -

**MAXOutreach**

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From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 3  
Date: 12/27/2013

Contact: STUDENT JOB POSTINGS

***There are job openings available with employers  
in your immediate area!***

MAXOutreach is a free service that distributes job openings to organizations like yours—who help people find work. The employers listed in this fax are accepting applications for a variety of positions.

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: outreachcoordinator@maximus.com  
Fax: 800-765-3370

***Please post this information or notify anyone  
who is seeking employment.***

**MAXOutreach Job Openings**

**Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)**

Search using the Job Reference Code

**Employer: Sears Holdings Corporation**

**Job Title: Office Associate**

**City: Newburgh State: NY Zip Code: 12550**

**Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=3824104>**

**Description: Jobs in this category are responsible for the processing...**

**Reference Code: 276012BR**

**FEIN#: 361750680**

# MAXOutreach Job Openings

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

Search using the Job Reference Code

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: [Outreach3Coordinator@maximus.com](mailto:Outreach3Coordinator@maximus.com)  
Fax: 800-765-3370

- End of Fax Transmission -

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 3  
Date: 4/2/2014

Contact: STUDENT JOB POSTINGS

***There are job openings available with employers  
in your immediate area!***

MAXOutreach is a free service that distributes job openings to organizations like yours—who help people find work. The employers listed in this fax are accepting applications for a variety of positions.

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: outreachcoordinator@maximus.com  
Fax: 800-765-3370

***Please post this information or notify anyone  
who is seeking employment.***

**MAXOutreach** Job Openings

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

Search using the Job Reference Code

Employer: **Sears Holdings Corporation**  
Job Title: **Consultative Sales- Fine Jewelry**  
City: **Nanuet** State: **NY** Zip Code: **10954**

Reference Code: **314442BR**  
FEIN#: **361750680**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=6108764>

Description: Jobs in this category are responsible for: selling...

Employer: **Sears Holdings Corporation**  
Job Title: **Cashier**  
City: **Nanuet** State: **NY** Zip Code: **10954**

Reference Code: **314124BR**  
FEIN#: **361750680**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=6110912>

Description: Responsible for providing excellent customer service,...

**MAXOutreach Job Openings**

**Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)**

Search using the Job Reference Code

If you have any questions or have received this in error, please contact:

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Phone: 800-274-8582 extension 185  
Email: [Outreach3Coordinator@maximus.com](mailto:Outreach3Coordinator@maximus.com)  
Fax: 800-765-3370

- End of Fax Transmission -

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 3  
Date: 5/22/2014

Contact: STUDENT JOB POSTINGS

***There are job openings available with employers  
in your immediate area!***

MAXOutreach is a free service that distributes job openings to organizations like yours—who help people find work. The employers listed in this fax are accepting applications for a variety of positions.

If you have any questions or have received this in error, please contact:

**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: [outreachcoordinator@maximus.com](mailto:outreachcoordinator@maximus.com)  
Fax: 800-765-3370

***Please post this information or notify anyone  
who is seeking employment.***

## MAXOutreach Job Openings

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

---

Search using the Job Reference Code

Employer: **Sears Holdings Corporation**

Job Title: **Cashier**

City: **Newburgh** State: **NY** Zip Code: **12550**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=7458967>

Description: Responsible for providing excellent customer service,...

Reference Code: **335817BR**

FEIN#: **361750680**

**MAXOutreach<sup>®</sup> Job Openings**

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Search using the Job Reference Code

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**MAXOutreach Service Representative**  
Phone: 800-274-8582 extension 185  
Email: Outreach3Coordinator@maximus.com  
Fax: 800-765-3370

- End of Fax Transmission -

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 2  
Date: 6/3/2014 - 7:30 PM

Contact: STUDENT JOB POSTINGS

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## MAXOutreach Job Openings

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

Search using the Job Reference Code

Employer: **Rite Aid**

Job Title: **Shift Supervisor**

City: **Stony Point** State: **NY** Zip Code: **10980**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=7709055>

Description: The primary purpose of this position is to provide...

Reference Code: **33295**

FEIN#:

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370

To: BAIS YAAKOV HIGH SCHOOL  
Phone: 8453563113  
Fax: 8453563132

No. of Pages: 2  
Date: 7/14/2015 - 2:59 PM

Contact: STUDENT JOB POSTINGS

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***Please post this information or notify anyone  
who is seeking employment.***

# MAXOutreach\* Job Openings

Apply Online at [www.maxoutreach.com/jobs](http://www.maxoutreach.com/jobs)

Search using the Job Reference Code

**Employer: Sears Holdings Corporation**

Job Title: **Merchandising and Pricing Lead**

City: **Newburgh** State: **NY** Zip Code: **12550**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=18926119>

Reference Code: **505324BR**

FEIN#: **361750680**

Description: Responsible for assisting the Assistant Store...

**Employer: Sears Holdings Corporation**

Job Title: **Cashier**

City: **Newburgh** State: **NY** Zip Code: **12550**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=18926141>

Reference Code: **505322BR**

FEIN#: **361750680**

Description: Responsible for providing excellent customer...

**Employer: Sears Holdings Corporation**

Job Title: **Backroom Associate**

City: **Newburgh** State: **NY** Zip Code: **12550**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=18926223>

Reference Code: **505319BR**

FEIN#: **361750680**

Description: Jobs in the category are responsible for the ...

**Employer: Sears Holdings Corporation**

Job Title: **Consultative Sales- Fine Jewelry**

City: **Newburgh** State: **NY** Zip Code: **12550**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=18926280>

Reference Code: **505317BR**

FEIN#: **361750680**

Description: Jobs in this category are responsible for...

**Employer: Sears Holdings Corporation**

Job Title: **Consultative Sales- Mattress**

City: **Newburgh** State: **NY** Zip Code: **12550**

Application Website: <http://client.maxoutreach.com/Jobs/Job.aspx?Job=18926337>

Reference Code: **505315BR**

FEIN#: **361750680**

Description: Jobs in this category are responsible for...

**Employer: Sears Holdings Corporation**

**MAXOutreach**

# Job Opening Notice

From: MAXIMUS Outreach Coordinator  
Phone: 800-274-8582 ext 185  
Fax: 800-765-3370  
Pages: 2  
Date: 01/20/2016 - 04:56 PM

To: BAIS YAAKOV HIGH SCHOOL  
To: 8453563113  
Fax: 8453563132  
  
Contact: STUDENT JOB POSTINGS

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