

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO.: _____

**FREDNER BOURSIQUOT,
and other similarly situated non-exempt employees,**

Plaintiff,

vs.

**SECURITAS SECURITY SERVICES USA, INC.,
a foreign profit corporation, and
DON W. WALKER, individually,**

Defendants.

NOTICE OF REMOVAL

**TO: The Judges of the United States District Court
For the Southern District of Florida**

Defendant, SECURITAS SECURITY SERVICES USA, INC. (“Securitas”), by and through its undersigned counsel, hereby files this Notice of Removal (“Notice”) of the action pending in the Seventeenth Judicial Circuit in and for Broward County, Florida. In support of this Notice, Securitas states as follows:

BACKGROUND AND TIMELINESS OF REMOVAL

1. Plaintiff, FREDNER BOURSIQUOT (“Boursiquot”), commenced an action against Securitas in the Circuit Court for the Seventeenth Judicial Circuit in and for Broward County, Florida, Case No. 18-004370. All pleadings and papers that have been filed and served in that action are attached to this Notice as Exhibit A.

2. Securitas was served with the Complaint on February 27, 2018, and, therefore, this notice is timely filed within 30 days of Securitas’ receipt of the Complaint, as required under 28

U.S.C. § 1446(b)(1). No further proceedings have been held herein, nor have any other pleadings or papers been filed other than those attached hereto as Exhibit A.

GROUND FOR REMOVAL – FEDERAL QUESTION

3. This Court has original jurisdiction over the action pursuant to 28 U.S.C. § 1331, which gives federal district courts original jurisdiction “of all civil actions arising under the Constitution, laws, or treaties of the United States.”

4. In his Complaint, Boursiquot alleges that he is a former employee of Securitas who he claims was unlawfully terminated on the basis of his race, in violation of the Florida Civil Rights Act (the “FCRA”) (Count 1); in retaliation for complaining about alleged discrimination in the workplace, also in violation of the FCRA (Count 2); and in retaliation for complaining about allegedly unpaid overtime wages, in violation of the Fair Labor Standards Act (the “FLSA”) (Count 6). Each of these counts arises out of the same common nucleus of operative fact – *i.e.*, the facts surrounding and reasons ultimately underlying Boursiquot’s termination.

5. Boursiquot also brings two additional, related counts under the FLSA, claiming that both Securitas (Count 4) and Defendant Don W. Walker (“Walker”) (Count 5) failed to pay him overtime pay for all hours worked in excess of forty per workweek. Presumably, the alleged complaints that Boursiquot claims form the basis of his FLSA retaliatory discharge claim (Count 6) concerned the allegedly unpaid overtime wages he alleges he is due.

6. Additionally, Boursiquot brings a hostile work environment claim under the FCRA (Count 3). Again, presumably, the alleged complaints that Boursiquot claims form the basis of his FCRA retaliatory discharge claim (Count 2) concerned the hostile work environment he alleges to have suffered.

7. Counts 4, 5, and 6 of Boursiquot's Complaint arise under the federal Fair Labor Standards Act of 1938, as amended, 29 U.S.C. § 201, *et seq.* Because the FLSA is "a law of the United States," this Court has federal question jurisdiction over Counts 4, 5, and 6 pursuant to 28 U.S.C. § 1331.

8. Counts 1, 2, and 3 of Boursiquot's Complaint arise out of the same common nucleus of operate fact as Counts 4, 5 and 6, such that all claims "form part of the same case or controversy" and should be tried together in a single judicial proceeding pursuant to 28 U.S.C. § 1367(a). *See United Mine Workers v. Gibbs*, 383 U.S. 715 (1966). More specifically, *all* of Boursiquot's claims involve the reasons underlying his termination from Securitas and the substance of the complaints that Boursiquot alleges, in part, gave rise to his termination.

9. Because Boursiquot's state law claims under the FCRA form part of the same case or controversy as his federal claims under the FLSA, this Court may properly exercise supplemental jurisdiction over Counts 1, 2, and 3 of Boursiquot's Complaint.

10. None of the specifically delineated reasons for declining the exercise of supplemental jurisdiction exist in this case. *See* 28 U.S.C. § 1367(c). Namely, Boursiquot's FCRA claims do not raise a novel or complex issue of state law and will not predominate over his FLSA claims.

ALL PROCEDURAL REQUIREMENTS FOR REMOVAL HAVE BEEN MET

11. Based on the above, this is a civil action over which this Court has jurisdiction pursuant to 28 U.S.C. § 1331 and § 1367(a), and, consequently, that may be removed to this Court by Securitas pursuant to 28 U.S.C. § 1441(a).

12. Securitas has given written notice of the filing of this Notice of Removal to all adverse parties as required by 28 U.S.C. § 1446(d) and has filed a copy of this Notice of Removal

with the Clerk of the Circuit Court for the Seventeenth Judicial Circuit in and for Broward County, Florida. Upon information and belief, no other defendant has been properly joined or served in this action.

13. This action was originally brought in Broward County, Florida, which is located within the Southern District of Florida, Fort Lauderdale Division. Therefore, venue is proper because the action is being removed to the district court of the United States for the “district and division embracing the place where such action is pending” or should be pending, as required by 28 U.S.C. § 1441(a).

14. By filing this Notice of Removal, Securitas does not waive and expressly reserves all rights, claims, and defenses, including, without limitation, all defenses relating to jurisdiction, venue, service of process, right to compel arbitration, and personal jurisdiction.

WHEREFORE, Securitas requests that the above-described action now pending in the Circuit Court for the Seventeenth Judicial Circuit in and for Broward County, Florida be removed therefrom to this Court.

Dated this 19th day of March, 2018.

Respectfully submitted,

s/Meagan L. Martin

Meagan L. Martin, Esq.

Florida Bar No. 0089657

mmartin@bakerlaw.com

Mary Caroline Miller, Esq.

Florida Bar No. 0125712

mcmiller@bakerlaw.com

BAKER & HOSTETLER LLP

200 South Orange Avenue, Suite 2300

Post Office Box 112

Orlando, Florida 32802-0112

Tel: (407) 649-4000/Fax: (407) 841-0168

COUNSEL FOR DEFENDANT SECURITAS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 19, 2018, a true and correct copy of the foregoing has been electronically filed with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to the following:

Jason S. Remer, Esq.
jremer@rgpattorneys.com
REMER & GEORGES-PIERRE, PLLC
44 West Flagler Street, Suite 2200
Miami, Florida 33130

s/Meagan L. Martin

Meagan L. Martin

CIVIL COVER SHEET

JS 44 (Rev. 06/17) FLSD Revised 06/01/2017

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS Fredner Boursiquot

DEFENDANTS Securitas Security Services USA, Inc. and Don W. Walker

(b) County of Residence of First Listed Plaintiff Broward County, Florida (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Jason S. Remer, Esq., Remer & Georges-Pierre, PLLC, 44 West Flagler Street, Suite 2200, Miami, Florida 33130

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Mary Caroline Miller, Esq., Baker & Hostetler LLP, 200 South Orange Avenue, Suite 2300, Orlando, Florida 32801

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- 1 U.S. Government Plaintiff Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant Diversity (Indicate Citizenship of Parties in Item III)

- Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country
Incorporated or Principal Place of Business In This State Incorporated and Principal Place of Business In Another State Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions

CONTRACT TORTS REAL PROPERTY CIVIL RIGHTS PRISONER PETITIONS LABOR IMMIGRATION FORFEITURE/PENALTY BANKRUPTCY SOCIAL SECURITY OTHER STATUTES FEDERAL TAX SUITS

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): Fair Labor Standards Act, as amended 29 U.S.C. Sec. 201; Fla. Civil Rights Act, Sec. 760.01; supp. jurisdiction)

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE March 19, 2018 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY RECEIPT # AMOUNT IFP JUDGE MAG JUDGE

EXHIBIT A

03/19/2018






Case Detail Public Broward County Clerk of Court

Fredner Boursiquot	Plaintiff vs. Securitas Security Service USA Inc, et al	Defendant
<p>Broward County Case Number: CACE18004370</p> <p>State Reporting Number: 062018CA004370AXXXCE</p> <p>Court Type: Civil Division - Circuit Court</p> <p>Case Type: Other - Discrimination Employment or Other</p> <p>Incident Date: N/A</p> <p>Filing Date: 02/23/2018</p> <p>Court Location: Central Courthouse</p> <p>Case Status: Pending</p> <p>Magistrate Id / Name: N/A</p> <p>Judge ID / Name: 13 Robinson, Michael A.</p>		

- Party(ies)			Total: 3
Party Type	Party Name	? Address	? Attorneys / Address ★ Denotes Lead Attorney
Plaintiff	Boursiquot, Fredner		★ Remer, Jason S Retained Bar ID: 165580 Remer & Georges-Pierre, PLLC Court House Tower 44 W. Flagler Street, Suite 2200 Miami, FL 33130
Defendant	Securitas Security Service USA Inc		
Defendant	Walker, Don W		

- Disposition(s)	Total: 0
<p>There is no Disposition information available for this case.</p>	

- Event(s) & Document(s)	Total: 8
Content area for events and documents	

Date ↕	Description	Additional Text	View	Pages ↕
02/26/2018	Filing Fee	Payor: JASON S REMER ; Userid: CTS-fg/t ; Receipt: 20181FA1A028875; ; Amount: \$401.00		
02/26/2018	Summons Issued Fee	Payor: JASON S REMER ; Userid: CTS-fg/t ; Receipt: 20181FA1A028875; ; Amount: \$10.00		
02/26/2018	Summons Issued Fee	Payor: JASON S REMER ; Userid: CTS-fg/t ; Receipt: 20181FA1A028875; ; Amount: \$10.00		
02/23/2018	Civil Cover Sheet			2
02/23/2018	Complaint (eFiled)	Party: <i>Plaintiff</i> Boursiquot, Fredner		18
02/23/2018	eSummons Issuance	To Don W. Walker		1
02/23/2018	eSummons Issuance	To Securitas Security Service USA, Inc		1
02/23/2018	Exhibits			2

- Hearing(s) Total: 0
 There is no Hearing information available for this case.

- Related Case(s) Total: 0
 There is no related case information available for this case.

Case Number: CACE-18-004370 Division: 13

Filing # 68406372 E-Filed 02/23/2018 04:05:47 PM

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner for the use of the Clerk of Court for the purpose of reporting judicial workload data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

Case No.: _____
Judge: _____

FREDNER BOURSQUOT

Plaintiff

vs.

SECURITAS SECURITY SERVICE USA, INC, DON W WALKER

Defendant

II. TYPE OF CASE

- Condominium
- Contracts and indebtedness
- Eminent domain
- Auto negligence
- Negligence – other
 - Business governance
 - Business torts
 - Environmental/Toxic tort
 - Third party indemnification
 - Construction defect
 - Mass tort
 - Negligent security
 - Nursing home negligence
 - Premises liability – commercial
 - Premises liability – residential
- Products liability
- Real Property/Mortgage foreclosure
 - Commercial foreclosure \$0 - \$50,000
 - Commercial foreclosure \$50,001 - \$249,999
 - Commercial foreclosure \$250,000 or more
 - Homestead residential foreclosure \$0 – 50,000
 - Homestead residential foreclosure \$50,001 - \$249,999
 - Homestead residential foreclosure \$250,000 or more
 - Non-homestead residential foreclosure \$0 - \$50,000
 - Non-homestead residential foreclosure \$50,001 - \$249,999

- Non-homestead residential foreclosure \$250,00 or more
- Other real property actions \$0 - \$50,000
- Other real property actions \$50,001 - \$249,999
- Other real property actions \$250,000 or more
- Professional malpractice
 - Malpractice – business
 - Malpractice – medical
 - Malpractice – other professional
- Other
 - Antitrust/Trade Regulation
 - Business Transaction
 - Circuit Civil - Not Applicable
 - Constitutional challenge-statute or ordinance
 - Constitutional challenge-proposed amendment
 - Corporate Trusts
 - Discrimination-employment or other
 - Insurance claims
 - Intellectual property
 - Libel/Slander
 - Shareholder derivative action
 - Securities litigation
 - Trade secrets
 - Trust litigation

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes No

III. REMEDIES SOUGHT (check all that apply):

- Monetary;
- Non-monetary declaratory or injunctive relief;
- Punitive

IV. NUMBER OF CAUSES OF ACTION: ()
(Specify)

6

V. IS THIS CASE A CLASS ACTION LAWSUIT?

- Yes
- No

VI. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- No
- Yes – If "yes" list all related cases by name, case number and court:

VII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- Yes
- No

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature s/ Jason S Remer FL Bar No.: 165580
Attorney or party

(Bar number, if attorney)

Jason S Remer 02/23/2018
(Type or print name)

Date

NRAI SERVICES, INC.

SERVICE OF PROCESS SUMMARY TRANSMITTAL FORM

To: JOSIAH ROCHA
Securitas Security Services USA, Inc.
4330 Park Terrace Dr
Westlake Village, CA 91361-4630

SOP Transmittal # 532872763

954-473-5503 - Telephone

Entity Served: SECURITAS SECURITY SERVICES USA, INC. (Domestic State: DELAWARE)

Enclosed herewith are legal documents received on behalf of the above captioned entity by NRAI Services, Inc. or its Affiliate in the State of FLORIDA on this 27 day of February, 2018. The following is a summary of the document(s) received:

1. **Title of Action:** FREDNER BOURSQUOT, and other similarly situated non-exempt employees, Pltf. vs. SECURITAS SECURITY SERVICES USA, INC., etc. and DON W. WALKER, etc., Dfts.

2. **Document(s) Served:** Other: Summons, Complaint, Attachment(s)

3. **Court of Jurisdiction/Case Number:** Broward County Court, FL
Case # CACE18004370

4. **Amount Claimed, if any:** N/A

5. **Method of Service:**

Personally served by: Process Server Law Enforcement Deputy Sheriff U. S Marshall

Delivered Via: Certified Mail Regular Mail Facsimile

Other (Explain):

6. **Date and Time of Receipt:** 02/27/2018 02:50:00 PM CST

7. **Appearance/Answer Date:** Within 20 days after service, exclusive of the day of service (Document(s) may contain additional answer dates)

8. **Received From:** Jason S. Remer
Remer & Georges-Pierre, PLLC
44 West Flagler Street
Suite 2200
Miami, Fl 33130
305-416-5000

9. **Carrier Airbill #**

10. **Call Made to:** Not required

11. **Special Comments:**

NRAI has retained the current log, Retain Date: 02/28/2018, Expected Purge Date: 03/30/2018

Image SOP

Email Notification, JOSIAH ROCHA JOSIAH.ROCHA@SECURITASINC.COM

Email Notification, Lauren Klionsky Lauren.Klionsky@securitasinc.com

Email Notification, Laura Polte Laura.Polte@securitasinc.com

NRAI SERVICES, INC.

CopiesTo:

Transmitted by Donna Moch

The information contained in this Summary Transmittal Form is provided by NRAI Services, Inc. for informational purposes only and should not be considered a legal opinion. It is the responsibility of the parties receiving this form to review the legal documents forwarded and to take appropriate action.

ORIGINAL

Case Number: CACE-18-004370 Division: 13

Filing # 68406372 E-Filed 02/23/2018 04:05:47 PM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA.

CASE NO: _____

FREDNER BOURSIQUOT,
and other similarly situated non-exempt employees,

Plaintiff,

vs.

SECURITAS SECURITY SERVICES USA, INC
a Foreign Profit Corporation and
DON W. WALKER, Individually.

Defendants.

SUMMONS IN A CIVIL CASE

TO: SECURITAS SECURITY SERVICES USA, INC, through its Registered Agent:

NRAI SERVICES, INC
1200 South Pine Island Road
Plantation, FL 33324

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY

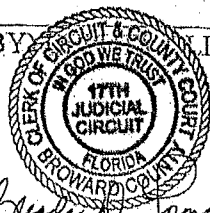
JASON S. REMER, ESQ.
REMER & GEORGES-PIERRE, PLLC.
44 WEST FLAGLER STREET
SUITE 2200
MIAMI, FL 33130

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

CLERK

FEB 26 2018

(BY) _____ CLERK



BRENDA D. FORMAN

Case Number: CACE-18-004370 Division: 13

Filing # 68406372 E-Filed 02/23/2018 04:05:47 PM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA.

CASE NO: _____

FREDNER BOURSQUOT,
and other similarly situated non-exempt employees,

Plaintiff,

vs.

SECURITAS SECURITY SERVICES USA, INC
a Foreign Profit Corporation and
DON W. WALKER, Individually.

Defendants.

SUMMONS IN A CIVIL CASE

TO: DON W. WALKER

180 N. STETSON AVENUE, #1975
CHICAGO, IL 60601

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY

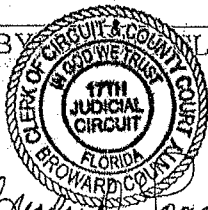
JASON S. REMER, ESQ.
REMER & GEORGES-PIERRE, PLLC.
44 WEST FLAGLER STREET
SUITE 2200
MIAMI, FL 33130

an answer to the complaint which is herewith served upon you, within **20 days** after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

CLERK

FEB 26 2018

(BY _____) CLERK



Brenda D. Forman
BRENDA D. FORMAN

Case Number: CACE-18-004370 Division: 13
Filing # 68406372 E-Filed 02/23/2018 04:05:47 PM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA.

CASE NO: 18-004370

FREDNER BOURSQUOT,
and other similarly situated non-exempt employees,

Plaintiff,

vs.

SECURITAS SECURITY SERVICES USA, INC
a Foreign Profit Corporation and
DON W. WALKER, Individually.

Defendants.

DATE: 2/27/18 TIME: 2:50P
INITIALS: AK ID #: 260

SUMMONS IN A CIVIL CASE

TO: SECURITAS SECURITY SERVICES USA, INC., through its Registered Agent:

NRAI SERVICES, INC
1200 South Pine Island Road
Plantation, FL 33324

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY

JASON S. REMER, ESQ.
REMER & GEORGES-PIERRE, PLLC,
44 WEST FLAGLER STREET
SUITE 2200
MIAMI, FL 33130

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

CLERK

FEB 26 2018

(BY) _____ CLERK



Brenda D. Forman
BRENDA D. FORMAN

*** FILED: BROWARD COUNTY, FL BRENDA D. FORMAN, CLERK 2/23/2018 4:05:46 PM ***

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA.

CASE NO: _____

FREDNER BOURSIQUOT,
and other similarly situated non-exempt employees,

Plaintiff,

vs.

SECURITAS SECURITY SERVICES USA, INC
a Foreign Profit Corporation and
DON W. WALKER, Individually.

Defendants.

COMPLAINT

(OPT-IN PURSUANT TO 29 U.S.C § 216(B))

COMES NOW, Plaintiff, FREDNER BOURSIQUOT ("Plaintiff"), on behalf of himself and other employees and former employees similarly situated, by and through undersigned counsel, files this Complaint against Defendants, SECURITAS SECURITY SERVICES USA, INC a Foreign Profit Corporation and DON W. WALKER, Individually ("Defendant(s)") and states as follows:

JURISDICTION AND VENUE

1. This action seeks damages in excess of \$15,000.00, independent of attorney's fees, costs, and interest, as a result of Defendants' race discrimination against Plaintiff in violation of the Florida Civil Rights Act, §760.01, et seq., Florida Statutes ("FCRA"). Additionally, this is an action by the Plaintiff and other similarly-situated individuals for damages pursuant to the Fair Labor Standards Act, as amended (29 U.S.C. §201, et seq.,

hereinafter called the "FLSA") to recover unpaid overtime compensation, and an additional equal amount as liquidated damages, obtain declaratory relief, and reasonable attorneys' fees and costs.

2. The jurisdiction of the Court over this controversy is based upon 29 U.S.C. §216(b).
3. Plaintiff was at all times relevant to this action, and continues to be, a resident Broward County Florida, within the jurisdiction of this Honorable Court. Plaintiff is a covered employee for purposes of the FCRA and FLSA.
4. Plaintiff was at all relevant times an employee of Defendants.
5. Defendants, SECURITAS SECURITY SERVICES USA, INC., having his main place of business in Broward County, Florida, where Plaintiff worked for Defendants and at all times material hereto was and is engaged in interstate commerce.
6. Defendant(s) is accordingly an "employer" as defined by the FCRA and FLSA.
7. Plaintiff alleges causes of action for race discrimination under the FCRA.
8. Venue is proper in Broward because all of the actions that form the basis of this Complaint occurred within Broward County, payment was due in Broward County and discrimination took place in Broward County.
9. As more fully set forth below, Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC") on July 26, 2017, claiming discrimination based on race (Attached herein as Exhibit A).
10. Plaintiff has accordingly exhausted his administrative remedies prior to initiating the instant suit.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

11. Plaintiff was employed by Defendants from approximately December 8, 2016 through on or about May 28, 2017 as a non-exempt security officer.

FACTUAL ALLEGATIONS COMMON TO THE
Florida Civil Rights Act

12. Plaintiff reasserts his allegations in paragraph 1-11 as if fully set forth herein.

13. Plaintiff is a black male individual and a covered employee for purposes of the FCRA and the FLSA.

14. Plaintiff was directly supervised by Tabata-Last Name Unknown (White-Director of Security) ("Tabata"), who was authorized to act on behalf of Defendants.

15. Throughout his employment with Defendants, Plaintiff performed his duties in an exemplary fashion. However, Plaintiff was subjected to pervasive and continued negative treatment based on his race.

16. Plaintiff was discriminated against by Defendants through the Director of Security Tabata based on his race.

17. Approximately on or about December 2016, Management through Tabata stated she was going to fire Black employees.

18. Tabata changed Plaintiff's position and reduced his rate of pay to eleven (\$11.00) dollars an hour in discrimination of his race.

19. During Plaintiff's employment, Tabata terminated and/or constructively discharged other black employees as Tabata favors white employees.

20. Plaintiff complained to Human Resources about Tabata's discriminatory treatment because of his race and his complaints were ignored.

21. Defendant(s) did not address Plaintiff complaints of discrimination.

22. Defendants created a hostile work environment because of Plaintiff's race, black.
23. Plaintiff was fire and/or constructively discharged on or about May 28, 2017, in retaliation for his complaints of discrimination due to his race, black.
24. Plaintiff has retained the undersigned counsel in order that his rights and interests may be protected.

FACTUAL ALLEGATIONS COMMON TO THE
Fair Labor Standards Act

25. Plaintiff reasserts his allegations in paragraph 1-11 as if fully set forth herein.
26. At all times material hereto, Plaintiff and Defendants were engaged in an implied agreement whereby Plaintiff would be employed by Defendants and that Plaintiff would be properly paid as provided for by, and not in violation of, the laws of the United States and the State of Florida.
27. During Plaintiff's employment, Defendants failed to compensate Plaintiff the required overtime and/or minimum wages at a rate of one and a half times Plaintiff's regular rate of pay for all hours worked in excess of forty (40) within a single work week.
28. At all times material hereto Defendants had or should have had full knowledge of all hours worked by Plaintiff, including those hours worked by Plaintiff in excess of forty (40) in a given week.
29. Plaintiff was paid approximately eleven dollars (\$11.00) per hours worked weekly.
30. During the relevant time period Plaintiff performed approximately fifteen (15) hours of overtime each week for which Defendants failed to pay Plaintiff at one-and-one-half times his regular rate of pay.
31. On or about January 2017, Plaintiff complained about unpaid overtime wages and no remedial action was taken.

32. Plaintiff was constructively discharged on or about May 28, 2017.

COUNT I
DISCRIMINATION BASED ON RACE
IN VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT

33. Plaintiff re-adopts each and every factual allegation as stated in paragraphs 1-23 of this complaint as if set out in full herein.

34. At all time material hereto, Defendants failed to comply with the Florida Civil Rights Act of 1992 Florida Statutes Section 760.10 which in its relevant section states it is an unlawful employment practice for an employer to discriminate or discharge or otherwise to discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment, because of such individuals race, color, or age.

35. The applicable statute, FCRA, prohibits an employer from making employment decisions, or from taking any personnel action, affecting the terms, conditions and privileges of one's employment, based upon race considerations or reasons.

36. The Plaintiff is a black male and he possessed the requisite qualifications and skills to perform his position with Defendants.

37. The Plaintiff was subjected to disparate treatment in the work place, in that similarly situated; non-black employees were allowed better work opportunities.

38. The Plaintiff was terminated as a result of his race and the reasons given by Defendants, if any, for her termination are mere pretext for illegal discrimination.

39. As a direct and proximate result of the Defendants unlawful acts, Plaintiff has suffered great and irreparable economic harm and other associated losses such as emotional distress, humiliation, embarrassment, and economic losses.

40. Moreover, as a further result of the Defendants unlawful race based discriminatory conduct, the Plaintiff has been compelled to file this action and he has incurred the costs of litigation.
41. Plaintiff was qualified for his position with Defendants.
42. Defendants violated the Florida Civil Rights Act of 1992 (FCRA) by discriminating against Plaintiff because of his race in the terms, conditions, and privileges of employment.
43. Defendants retaliated against Plaintiff after complaints of race discrimination and failed to address complaints of discrimination.
44. The Defendants' actions were malicious and were reckless indifferent to the Plaintiff's rights pursuant to Florida Statute Section 760, protecting a person from discrimination because of race.
45. The aforementioned actions of Defendants were done wantonly, willfully, maliciously, and with reckless disregard of the consequences of such actions.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter judgment against the Defendants; find that the Defendants indeed violated the FRCA, and in addition, order the following additional relief:

PRAYER FOR RELIEF

WHEREFORE, the PLAINTIFF prays that this Court will;

- A. Declare that the acts complained of herein are in violation of the Florida Civil Rights Act;
- B. Award PLAINTIFF compensatory damages for emotional distress, embarrassment and humiliation;

- C. Grant a permanent injunction enjoining the DEFENDANTS, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in any employment practice which discriminates on the basis of race;
- D. Reinstate PLAINTIFF to the same position she held before the retaliatory personnel action, or to an equivalent position;
- E. Reinstate full fringe benefits and seniority rights to PLAINTIFF;
- F. Order DEFENDANTS to make PLAINTIFF whole, by compensating PLAINTIFF for lost wages, benefits, including front pay, back pay with prejudgment interest;
- G. For a money judgment representing prejudgment interest;
- H. Award any other compensation allowed by law including punitive damages and attorney's fees (448.104);
- I. Grant PLAINTIFF's costs of this action, including reasonable attorney's fees;
- J. Grant PLAINTIFF a trial by jury;
- K. Grant such other and further relief as the Court deems just and proper.

COUNT II
RETALIATION IN VIOLATION OF
THE FLORIDA CIVIL RIGHTS ACT

- 46. Plaintiff re-adopts each and every factual allegation as stated in 1 through 23 of this Complaint as if set out in full herein.
- 47. Defendants are employers as the term is used under the applicable statutes referenced above.

48. The foregoing allegations establish a cause of action for unlawful retaliation after Plaintiff reported unlawful employment practices adversely affecting him under the FCRA.
49. The foregoing unlawful actions by Defendants were purposeful.
50. Plaintiff voiced opposition to unlawful employment practices during his employment with Defendants and he was the victim of retaliation thereafter, as related in part above.
51. Plaintiff is a member of a protected class because he reported unlawful employment practices and was the victim of retaliation thereafter. There is a causal connection between the reporting of the unlawful employment practices and the adverse employment action taken thereafter.
52. As a direct and proximate result of the foregoing unlawful acts and omissions, Plaintiff has suffered mental anguish, emotional distress, expense, loss of benefits, embarrassment, humiliation, damage to reputation, illness, lost wages, loss of capacity for the enjoyment of life, and other tangible and intangible damages.
53. These damages are continuing and are permanent.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter judgment against the Defendants; find that the Defendants indeed violated the FRCA, and in addition, order the following additional relief:

- A. Declare that the acts complained of herein are in violation of the Florida Civil Rights Act;
- B. Award PLAINTIFF compensatory damages for emotional distress, embarrassment and humiliation;

- C. Grant a permanent injunction enjoining the DEFENDANTS, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in any employment practice which discriminates;
- D. Reinstate PLAINTIFF to the same position he held before the retaliatory personnel action, or to an equivalent position;
- E. Reinstate full fringe benefits and seniority rights to PLAINTIFF;
- F. Order DEFENDANTS to make PLAINTIFF whole, by compensating PLAINTIFF for lost wages, benefits, including front pay, back pay with prejudgment interest;
- G. For a money judgment representing prejudgment interest;
- H. Award any other compensation allowed by law including punitive damages and attorney's fees (448.104);
- I. Grant PLAINTIFF's costs of this action, including reasonable attorney's fees;
- J. Grant PLAINTIFF a trial by jury; and
- K. Grant such other and further relief as the Court deems just and proper.

COUNT III
HOSTILE WORK ENVIRONMENT
IN VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT

- 54. Plaintiff re-adopts each and every factual allegation as stated in 1 through 24 of this Complaint as if set-out in full herein.
- 55. Defendants are employers as that term is used under the applicable statutes referenced above.

56. The foregoing allegations establish a cause of action for unlawful retaliation after Plaintiff reported unlawful employment practices adversely affecting him under the FCRA.
57. Plaintiff, as a black male individual, within a protected class as envisioned by the FCRA.
58. During his employment with Defendants, Tabata subjected Plaintiff to unwelcome verbal harassment.
59. Defendants are liable for this conduct, either vicariously or directly, where Plaintiff complained to management and ownership about the harassment and abuse and no remedial or disciplinary was undertaken.
60. As a direct and proximate result of the foregoing unlawful acts and omissions, Plaintiff has suffered mental anguish, emotional distress, expense, loss of benefits, embarrassment, humiliation, damage to reputation, lost wages, loss of capacity for the enjoyment of life, and other tangible and intangible damages.
61. These damages are continuing and are permanent.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter judgment against the Defendant; find that the Defendant indeed violated the FRCA by failing to remedy this hostile work environment; and in addition, order the following additional relief:

- A. Declare that the acts complained of herein are in violation of the Florida Civil Rights Act;
- B. Award PLAINTIFF compensatory damages for emotional distress, embarrassment and humiliation;

- C. Grant a permanent injunction enjoining the DEFENDANT, its officers, successors, assigns, and all persons in active concert or participation with it, from engaging in any employment practice which discriminates;
- D. Reinstate PLAINTIFF to the same position she held before the retaliatory personnel action, or to an equivalent position;
- E. Reinstate full fringe benefits and seniority rights to PLAINTIFF;
- F. Order DEFENDANT to make PLAINTIFF whole, by compensating PLAINTIFF for lost wages, benefits, including front pay, back pay with prejudgment interest;
- G. For a money judgment representing prejudgment interest;
- H. Award any other compensation allowed by law including punitive damages and attorney's fees (448.104);
- I. Grant PLAINTIFF's costs of this action, including reasonable attorney's fees;
- J. Grant PLAINTIFF a trial by jury; and
- K. Grant such other and further relief as the Court deems just and proper.

COUNT IV

***Wage & Hour Federal Statutory Violation Against
SECURITAS SECURITY SERVICES USA, INC***

- 62. Plaintiff re-adopts each and every factual allegation as stated in paragraphs 1-10, 24-31 of this complaint as if set out in full herein.
- 63. This action is brought by Plaintiff and other similarly-situated individuals to recover from Defendants unpaid minimum wage and overtime compensation, as well as an additional amount as liquidated damages, costs, and reasonable attorney's fees under the provisions of 29 U.S.C. § 201 *et seq.*, and specifically under the provisions of 29 U.S.C. § 207. 29 U.S.C. § 207 (a)(1) states, " No employer shall employ any of his employees... for a

work week longer than 40 hours unless such employee receives compensation for his employment in excess of the hours above-specified at a rate not less than one and a half times the regular rate at which he is employed.”

64. Jurisdiction is conferred on this Court by Title 29 U.S.C. § 216(b).
65. At all times pertinent to this Complaint, Defendants operated as an organization which sells and/or markets its services and/or goods to customers from throughout the United States and also provides its services for goods sold and transported from across state lines of other states, and the Defendants obtains and solicits funds from non-Florida sources, accepts funds from non-Florida sources, uses telephonic transmissions going over state lines to do its business, transmits funds outside the State of Florida, and otherwise regularly engages in interstate commerce, particularly with respect to its employees.
66. Upon information and belief, the annual gross revenue of the Defendants was at all times material hereto in excess of \$500,000 per annum, and, by virtue of working in interstate commerce, otherwise satisfies the FLSA’s coverage requirements.
67. By reason of the foregoing, the Defendant(s) is and was, during all times hereafter mentioned, an enterprise engaged in commerce or in the production of goods for commerce as defined in §§ 3 (r) and 3(s) of the FLSA, 29 U.S.C. § 203(r) and 203(s). Defendants’ business activities involve those to which the Fair Labor Standards Act applies. The Plaintiff’s work for the Defendants likewise affects interstate commerce.
68. Plaintiff seeks to recover for unpaid wages accumulated from the date of hire.
69. At all times material hereto, the Defendants failed to comply with Title 29 U.S.C. §§ 201-219 and 29 C.F.R. § 516.2 and § 516.4 *et seq.* in that Plaintiff performed services and worked in excess of the maximum hours provided by the FLSA but no provision was

made by the Defendants to properly pay him at the rate of time and one half for all hours worked in excess of forty hours (40) per workweek as provided in the FLSA.

70. Defendants knew and/or showed reckless disregard of the provisions of the FLSA concerning the payment of overtime wages as required by the Fair Labor Standards Act and remain owing Plaintiff these unpaid wages since the commencement of Plaintiff's employment with Defendants as set forth above. As such, Plaintiff is entitled to recover double damages.
71. Defendants never posted any notice, as required by the Fair Labor Standards Act and Federal Law, to inform employees of their federal rights to overtime and minimum wage payments.

WHEREFORE, Plaintiff respectfully prays for the following relief against Defendant:

- A. Adjudge and decree that Defendant(s) has violated the FLSA and has done so willfully, intentionally and with reckless disregard for Plaintiff's rights;
- B. Award Plaintiff actual damages in the amount shown to be due for unpaid minimum wage and overtime compensation for hours worked in excess of forty (40) weekly, with interest; and
- C. Award Plaintiff an equal amount in double damages/liquidated damages; and
- D. Award Plaintiff the costs of this action, together with a reasonable attorneys' fees; and
- E. Grant Plaintiff such additional relief as the Court deems just and proper under the circumstances.

COUNT V

*Wage & Hour Federal Statutory Violation Against
DON W. WALKER*

72. Plaintiff re-adopts each and every factual allegation as stated in paragraphs 1-10, 24-31 of this complaint as if set out in full herein.
73. This action is brought by Plaintiff and other similarly-situated individuals to recover from Defendants unpaid minimum wage and overtime compensation, as well as an additional amount as liquidated damages, costs, and reasonable attorney's fees under the provisions of 29 U.S.C. § 201 *et seq.*, and specifically under the provisions of 29 U.S.C. § 207. 29 U.S.C. § 207 (a)(1) states, " No employer shall employ any of his employees... for a work week longer than 40 hours unless such employee receives compensation for his employment in excess of the hours above-specified at a rate not less than one and a half times the regular rate at which he is employed."
74. At the times mentioned, Defendant DON W. WALKER, had the authority and/or power to alter the terms and conditions of Plaintiff's employment in the areas of his employment (hire/fire), scheduled hours and/or rate of pay.
75. Defendant was an employer of Plaintiff within the meaning of Section 3(d) of the "Fair Labor Standards Act" [29 U.S.C. § 203(d)], in that this individual Defendant acted directly in the interests of Defendant's employer in relation to the employees of Defendant employer, including Plaintiff.
76. Defendant had operational control of the business and is thus jointly liable for Plaintiff's damages.
77. Defendants willfully and intentionally refused to properly pay Plaintiff wages as required by the law of the United States as set forth above and remains owing Plaintiff these

wages since the commencement of Plaintiff's employment with Defendants as set forth above.

78. At all times pertinent to this Complaint, Defendants operated as an organization which sells and/or markets its services and/or goods to customers from throughout the United States and also provides its services for goods sold and transported from across state lines of other states, and the Defendants obtain and solicits funds from non-Florida sources, accepts funds from non-Florida sources, uses telephonic transmissions going over state lines to do its business, transmits funds outside the State of Florida, and otherwise regularly engages in interstate commerce, particularly with respect to its employees.
79. Upon information and belief, the annual gross revenue of the Defendant(s) was at all times material hereto in excess of \$500,000 per annum, and, by virtue of working in interstate commerce, otherwise satisfies the FLSA's coverage requirements,
80. By reason of the foregoing, the Defendant is and was, during all times hereafter mentioned, an enterprise engaged in commerce or in the production of goods for commerce as defined in §§ 3 (r) and 3(s) of the FLSA, 29 U.S.C. § 203(r) and 203(s). Defendants' business activities involve those to which the Fair Labor Standards Act applies. The Plaintiff's work for the Defendants likewise affects interstate commerce.
81. Plaintiff seeks to recover for unpaid wages accumulated from the date of hire.
82. At all times material hereto, the Defendants failed to comply with Title 29 U.S.C. §§ 201-219 and 29 C.F.R. § 516.2 and § 516.4 *et seq.* in that Plaintiff performed services and worked in excess of the maximum hours provided by the FLSA but no provision was made by the Defendants to properly pay him at the rate of time and one half for all hours worked in excess of forty hours (40) per workweek as provided in the FLSA.

83. Defendants knew and/or showed reckless disregard of the provisions of the FLSA concerning the payment of overtime wages as required by the Fair Labor Standards Act and remain owing Plaintiff these unpaid wages since the commencement of Plaintiff's employment with Defendant as set forth above. As such, Plaintiff is entitled to recover double damages.

84. Defendants never posted any notice, as required by the Fair Labor Standards Act and Federal Law, to inform employees of their federal rights to overtime and minimum wage payments.

WHEREFORE, Plaintiff respectfully prays for the following relief against Defendant:

- A. Adjudge and decree that Defendant(s) has violated the FLSA and has done so willfully, intentionally and with reckless disregard for Plaintiff's rights;
- B. Award Plaintiff actual damages in the amount shown to be due for unpaid minimum wage and overtime compensation for hours worked in excess of forty (40) weekly, with interest; and
- C. Award Plaintiff an equal amount in double damages/liquidated damages; and
- D. Award Plaintiff the costs of this action, together with a reasonable attorneys' fees; and
- E. Grant Plaintiff such additional relief as the Court deems just and proper under the circumstances.

COUNT VI
Retaliatory Discharge Against
SECURITAS SECURITY SERVICES USA, INC and
DON W. WALKER

85. Plaintiff realleges and reavers paragraph 1-10, 24-31 of the Complaint as if fully set forth herein.
86. Defendant's conduct as set forth above constitutes a violation of the FLSA's anti-retaliation provision.
87. The motivating factor that caused Plaintiff' adverse employment action as described above was Plaintiff' complaint regarding not being properly paid for all hours worked.
88. The Defendant's conduct was in direct violation of the FLSA, and, as a direct result, Plaintiff have been damaged.

WHEREFORE, Plaintiff respectfully prays for the following relief against Defendant:

- A. Adjudge and decree that Defendant has violated the FLSA and have done so willfully, intentionally and with reckless disregard for Plaintiff' rights;
- B. Enter judgment against the Defendant for all back wages from the date of discharge to the present date and an equal amount of back wages as liquidated damages, and;
- C. Enter judgment against the Defendant for all front wages until Plaintiff becomes 65 years of age; and
- D. Enter an award against Defendant and award Plaintiff compensatory damages for mental anguish, personal suffering, and loss of enjoyment of life;
- E. Award Plaintiff the costs of this action, together with a reasonable attorneys' fees; and
- F. Grant Plaintiff such additional relief as the Court deems just and proper under the circumstances.

JURY DEMAND

Plaintiff demands trial by jury of all issues triable as of right by jury.


Dated 2-23-18

Respectfully submitted,

Jason S. Remer, Esq.
Florida Bar No.: 0165580
jrem@rgpattoorneys.com
Brody M. Shulman, Esq.
Fla. Bar No.: 092044

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Telephone: (305) 416-5000
Facsimile: (305) 416-5005

EEOC Form 5 (5/01)

CHARGE OF DISCRIMINATION		Charge Presented to: Agency(ies) Charge No(s):	
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		<input checked="" type="checkbox"/> FEPA (FCHR) <input checked="" type="checkbox"/> EEOC <input checked="" type="checkbox"/> MDCCHR	
EEOC – U.S. Equal Employment Opportunity Commission and FCHR – Florida Commission on Human Relations, MDCCHR – Miami-Dade County Commission on Human Rights <i>State or Local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Fredner Boursiquot		Home Phone (Incl. Area Code) 954-213-9052	Date of Birth 8/22/1975
Street Address 777 NW 155th Lane, #401		City, State and ZIP Code Miami, FL 33169	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Securitas Security		No. Employees, Members 20+	Phone No. (Include Area Code) 954-989-6802
Street Address 6030 Hollywood Blvd. #201		City, State and ZIP Code Hollywood, FL 33024	
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).)		DATE(S) DISCRIMINATION TOOK PLACE	
<input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN		Earliest	Latest
<input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER		December 8, 2016	January, 2017
		<input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)):			
<p>I feel that I was discriminated against by my employer, Securitas Security (the company) through my Supervisor, Tabata, because of my race. I am a Haitian male individual and was employed on or about December 8, 2016 as a security Officer making \$11 an hour.</p> <p>The discrimination I am subjected to includes, but is not limited to the following: From the moment Tabata, the Director of Security, came on board, the end of December 2016, she said she would get rid of us "so get ready". She changed my position and decreased my salary to \$10 an hour. I am owed over time since January 2017 that no one has done anything about it, no matter how much I complain. Ever since then, they've been promising to fix the problem but they don't.</p> <p>From January to April 2017, Tabata has fired and has had people constructively discharged, all black employees. She has treated everyone like trash, talking down to people, treating adults like children, she would yell at us. I complained to Human Resources on numerous occasions but it never went anywhere.</p> <p>I ended up quitting my job due to this lady. I feel that I am very qualified, and employer records would demonstrate that I am a good employee, with no bad behavior at work.</p> <p>I believe that I have been discriminated against in violation of the Florida Civil Rights Act, and local laws.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary, State or Local Agency Requirements  Naomi Gaston Commission # FF072321 Expires: Nov. 21, 2017 www.AARONNOTARY.com	
		I swear or affirm that I have read the above charge and	

<p>I declare under penalty of perjury that the above is true and correct.</p> <p><u>1-24-17</u> Date</p> <p><u>[Signature]</u> Charging Party Signature</p>	<p>that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT <u>[Signature]</u></p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</p>
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ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Racial Discrimination Lawsuit Against Securitas Security Services USA Removed to Federal Court](#)
