

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

ROBERTO GOMEZ,
LUIS MALDONADO,
MIRIEL RODRIGUEZ, and
ORLANDO RODRIGUEZ,

on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

BELFOR USA GROUP, INC.
d/b/a BELFOR SOUTH FLORIDA,
STATEWIDE SAI, INC.,
d/b/a STATEWIDE ASSOCIATES, INC.

Defendants.

_____ /

CLASS ACTION COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs, ROBERTO GOMEZ, LUIS MALDONADO, MIRIEL RODRIGUEZ, and ORLANDO RODRIGUEZ (“Plaintiffs”), on behalf of themselves and others similarly situated, by and through undersigned counsel, file this Complaint against Defendants, BELFOR USA GROUP, INC., d/b/a BELFOR SOUTH FLORIDA, STATEWIDE SAI, INC., d/b/a STATEWIDE ASSOCIATES, INC. (collectively “Defendants”), and allege to the best of their knowledge, information and belief, formed after an inquiry reasonable under the circumstances, as follows:

INTRODUCTION

1. This is a collective action brought by Plaintiffs on behalf of themselves and others similarly situated and against Defendants for unpaid overtime, minimum and regular wages

pursuant to the Fair Labor Standards Act (“FLSA”) 29 U.S.C. § 201 et seq., as well as pursuant to Chapter 448, Florida Statutes. Plaintiff seeks damages and reasonable attorney’s fees, together with other relief.

2. Plaintiffs bring this action against Defendants, as joint employers, and on behalf of themselves and a class of workers who performed manual labor and restoration work in or around the Florida Keys in the aftermath of Hurricane Irma. For several weeks, Plaintiffs and other class members worked seven days a week, a minimum of twelve hours a day restoring property and buildings damaged by the hurricane. Aside from minor, isolated cash payments, Plaintiffs and other class members were not paid for their labor and services.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 and § 1337 because this case arises under the Fair Labor Standards Act 29 U.S.C. §§ 201-216 (“FLSA”), as well as a Florida state law cause of action that arises out of the same operative facts as Plaintiffs’ claims under the FLSA.

4. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. § 1391(b) because Plaintiffs were employed by Defendants in a location within this district and a substantial amount of the actions at issue occurred in this district.

THE PARTIES

5. Plaintiffs and the other class members are workers who are Florida residents and worked in or around the Florida Keys during the time relevant to this action. Each of the named Plaintiffs have attached opt-in forms to this Complaint.

6. Defendant, BELFOR USA GROUP, INC., d/b/a BELFOR SOUTH FLORIDA (“BELFOR”), is a multi-national disaster recovery and restoration company with offices

throughout the U.S., including the state of Florida and within this District. In this Complaint, “BELFOR” refers to this named defendant and all predecessor, successor, subsidiary, parent and related entities to which these allegations pertain.

7. Defendant, STATEWIDE SAI, INC., d/b/a STATEWIDE ASSOCIATES, INC. (“SAI”), is a Florida corporation existing under the laws of the State of Florida. In this Complaint, “SAI” refers to this named defendant and all predecessor, successor, subsidiary, parent and related entities to which these allegations pertain.

8. At all times during the employment of Plaintiffs and the other class members, Defendants were employers as defined by 29 U.S.C. §203.

9. At all material times relevant to this action, Defendants were an enterprise engaged in commerce covered by the FLSA, and as defined by 29 U.S.C. §203(r) and §203(s).

10. At all material times relevant to this action, Defendants made gross earnings of at least \$500,000.00 annually.

11. At all material times relevant to this action, Defendants had two or more employees engaged in commerce, producing goods for commerce, or handling, selling or otherwise working on goods or materials that have been moved in or produced for such commerce.

12. Plaintiffs and other class members were employees of Defendants and were individually engaged in commerce as defined by 29 U.S.C. §§206(a) and 207(a)(1).

13. At all times relevant to this action Defendants engaged in hurricane mitigation and reconstruction work in and around the Florida Keys and had significant contacts with the state of Florida and this District such that jurisdiction and venue are proper in this Court.

GENERAL FACTUAL ALLEGATIONS

14. Immediately following Hurricane Irma, Defendant BELFOR was contracted to

provide mitigation and restoration services in or around the Florida Keys, including the Florida Keys Community College campus.

15. Upon information and belief, Defendant BELFOR continues to perform mitigation and restoration services in or around the Florida Keys, including the Florida Keys Community College campus.

16. As part of its business practices, Defendant BELFOR set up a subcontractor system for the hiring of manual, unskilled laborers to perform some of the subject mitigation and restoration services.

17. Defendant SAI was one of the subcontractors utilized by Defendant BELFOR to locate and secure manual, unskilled laborers.

18. To entice their participation, Defendants promised Plaintiffs and other class members a minimum regular rate of pay of \$15.00 per hour, and that the work would last anywhere from at least 6 up to 12 months.

19. Plaintiffs and other class members worked as unskilled manual laborers in and around the Florida Keys as part of the Hurricane Irma mitigation and restoration project.

20. Plaintiffs and other class members performed substantially similar unskilled manual labor work in public and private buildings including but not limited to the Florida Keys Community College campus.

21. Plaintiffs and other class members routinely worked in excess of forty (40) hours per work week.

22. Other than a few isolated cash payments, Defendants did not pay Plaintiffs and other class members any wages, including minimum and overtime wages.

23. Documentation evidencing the number of hours worked by Plaintiffs and other

class members and the compensation actually paid to Plaintiffs and other class members is in the possession, custody, and control of Defendants.

24. The named Plaintiffs have retained the undersigned law firms to represent them in this matter and have agreed to pay the law firm a reasonable fee for its services.

COLLECTIVE AND CLASS ACTION ALLEGATIONS

A. FLSA Collective Action

25. Plaintiffs bring Count I, the FLSA Collective Action pursuant to 29 U.S.C. § 216(b) of the FLSA, on behalf of themselves and on behalf of the following Class of persons:

All individuals who performed unskilled manual labor for subcontractors of Defendant BELFOR, including but not limited to Defendant SAI, in the post Hurricane Irma reconstruction and restoration in the Florida Keys beginning September 11, 2017 until the date of filing of the present action who were eligible for overtime pursuant to 29 U.S.C. § 207 and who did not receive overtime pay.

26. The FLSA claim will be pursued by those who opt-in to this case, pursuant to 29 U.S.C. § 216(b).

27. The named Plaintiffs, individually and on behalf of other similarly situated employees, seek relief on a collective basis for Defendants' failure to pay overtime wages as required by the FLSA.

28. The number and identity of other plaintiffs yet to opt-in and consent to be party plaintiffs may be determined from Defendants' records, and potential class members may easily and quickly be notified of the pendency of this action.

B. Florida Class Action

29. Plaintiffs bring Count II, the Florida Class Action pursuant to Federal Rule of Civil Procedure 23(a)(1)-(4) and (b)(3), on behalf of themselves and on behalf of the following Class of persons:

All individuals who performed unskilled manual labor for subcontractors of Defendant BELFOR, including but not limited to Defendant SAI, in the post Hurricane Irma reconstruction and restoration in the Florida Keys from September 11, 2017 until the date of filing of the present action, who were eligible for minimum wage pursuant to Article X, Section 24 of the Florida Constitution and Section 448.110 Florida Statutes and who were not paid a minimum or regular wage.

30. Plaintiffs and other class members were hired by subcontractors, including but not limited to Defendant SAI, utilized by Defendant BELFOR to fulfil Defendant BELFOR's needs for manual labor in conducting cleanup and reconstruction work in the Florida Keys. Accordingly, at all times relevant to this action, Defendant BELFOR acted as a joint employer of Plaintiffs and other class members with those subcontractors, including but not limited to Defendant SAI.

C. Allegations Common to All Claims

31. The members of both the FLSA Collective Action and Florida Class Action are so numerous that joinder of all members would be impracticable, if not impossible. Plaintiffs are informed and believe there are over one hundred members who could be part of both the FLSA Collective Action and Florida Class Action.

32. The questions of fact are common to both the FLSA Collective Action and Florida Class Action, including whether Defendants failed to pay named Plaintiffs and other class members overtime, minimum and/or regular wages as required by federal and state law.

33. The claims of the named Plaintiffs are typical of both the FLSA Collective Action and Florida Class Action, and these typical, common claims predominate over any questions affecting only individual class members.

34. The named Plaintiffs have the same interests as do the other members of the class and will vigorously prosecute these interests on behalf of the class. The named Plaintiffs have retained competent and capable attorneys who are experienced trial lawyers with significant

experience in complex and class action litigation, including employment litigation. Neither the named Plaintiffs nor their counsel have interests that are contrary to or that conflict with those of the proposed class members.

35. Class certification is appropriate under Federal Rule of Civil Procedure 23(b)(3) because questions of law and fact common to class members predominate over any questions affecting only individual members. Adjudication of these common issues in a single action has important and desirable advantages of judicial economy, and no unusual difficulties are likely to be encountered in the management of this action as a class action. The class action mechanism is superior to any alternatives that might exist for the fair and efficient adjudication of these claims.

COUNT I – FLSA COLLECTIVE ACTION
(Failure to Pay Federal Overtime Wages)

36. Plaintiffs re-allege and incorporate paragraphs 1 through 36, as if fully set forth herein.

37. Plaintiffs, Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez, have consented in writing to be party plaintiffs in this FLSA action.

38. Defendants violated 29 U.S.C. § 207(a) by failing to pay Plaintiffs and others similarly situated at an hourly rate equal to one and a half times the regular hourly rate at which they were employed for all compensable time they were employed in excess of forty hours in each workweek.

39. Defendants' failure to pay Plaintiffs and others similarly situated the federally mandated overtime wage rate for all time they were employed in excess of forty (40) hours in each workweek was a willful violation of the FLSA.

40. As a consequence of the Defendants' violation of the FLSA, Plaintiffs and others similarly situated are entitled to recover their unpaid overtime, plus an additional amount equal in

liquidated damages, pursuant to 29 U.S.C. § 216(b).

WHEREFORE, Plaintiffs pray for this Court to award the following:

- (a) With respect to the claims set forth in Count I, permitting this case to proceed as a collective action, ordering the Defendants to disclose the names and addresses of all those individuals who are similarly situated, and permitting Plaintiffs to send notice of this action to all those similarly situated individuals;
- (b) Designation of the named Plaintiffs, Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez, as representatives of the FLSA collective action;
- (c) Declaring that Defendants willfully violated the overtime provisions of the FLSA, as set forth in Count I;
- (d) Granting judgment in favor of Plaintiffs and all others similarly situated and against the Defendant on their claims under the FLSA as set forth in Count I and awarding each of these Plaintiffs and all other similarly situated individuals who opt-in to this action their unpaid overtime wages and an equal amount in liquidated damages;
- (e) Awarding Plaintiffs reasonable attorneys' fees;
- (f) Awarding Plaintiffs the costs of this action; and
- (g) Granting such other relief as the Court deems just and equitable.

COUNT II – FLORIDA CLASS ACTION
(Failure to Pay Florida Minimum & Regular Wages)

41. Plaintiffs re-allege and incorporate paragraphs 1 through 36, as if fully set forth herein.

42. Pursuant to Article X, Section 24 of the Florida Constitution and Section 448.110 Florida Statutes, Defendants were required to pay Plaintiffs and others similarly situated at least the applicable Florida minimum wage.

43. Defendants violated Article X, Section 24 of the Florida Constitution and Section 448.110 Florida Statutes by failing to pay Plaintiffs and others similarly situated the applicable

Florida minimum wage throughout their employment with Defendants.

44. Defendants' failure to pay Plaintiffs and all others similarly situated the required Florida minimum wage was not in good faith and Defendants did not have reasonable grounds for believing their failure to pay minimum wages was not a violation of Article X, Section 24 of the Florida Constitution and Section 448.110 Florida Statutes.

45. In accordance with Section 448.110(6)(a), Defendants received written notices of Plaintiffs' intent to initiate the present action for unpaid Florida minimum wages. No agreement was reached between the parties pursuant to Plaintiffs' statutory notice.

46. Additionally, by failing to pay Plaintiffs and all others similarly situated the agreed upon regular wages, Defendants violated Chapter 448, Florida Statutes.

47. Pursuant to Section 448.08, Florida Statutes, Plaintiffs are entitled to costs of the action and reasonable attorneys' fees for both Defendants' failure to pay the required Florida minimum wage and also the agreed upon regular wages.

WHEREFORE, Plaintiffs pray for this Court to award the following:

- (a) With respect to the claims set forth in Count II, permitting this case to proceed as a class action, ordering the Defendants to disclose the names and addresses of all those individuals who are similarly situated, and permitting Plaintiffs to send notice of this action to all those similarly situated individuals;
- (b) Designation of the named Plaintiffs, Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez, as representatives of the Florida class action;
- (c) Declaring that Defendants willfully violated the minimum wage provisions of the Florida law, as set forth in Count II;
- (d) Granting judgment in favor of Plaintiffs and all others similarly situated and against the Defendant on their claims under Florida law as set forth in Count II and awarding each of these Plaintiffs and all other similarly situated individuals who do not opt-out to this action their unpaid minimum wages and an equal amount in liquidated damages;

- (e) Granting judgment in favor of Plaintiffs and all others similarly situated and against the Defendant on their claims under Florida law as set forth in Count II and awarding each of these Plaintiffs and all other similarly situated individuals who do not opt-out to this action their unpaid regular wages;
- (f) Awarding Plaintiffs reasonable attorneys' fees;
- (g) Awarding Plaintiffs the costs of this action; and
- (h) Granting such other relief as the Court deems just and equitable.

DEMAND FOR JURY TRIAL

Pursuant to the provisions of Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiffs demand a trial by jury on all issues so triable in this matter.

Dated: October 29, 2018

Respectfully Submitted,

By: /s/ Gustavo A. Bravo

Gustavo A. Bravo

Florida Bar No.: 551287

Neil D. Kodsi (of counsel)

Florida Bar No.: 011255

BRAVO LAW

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AND AS CO-COUNSEL

Jordan M. Lewis, Esq.

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Plaintiffs,

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d/b/a BELFOR SOUTH FLORIDA,
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d/b/a STATEWIDE ASSOCIATES, INC.

Defendants.

_____/

Consent To Join Collective Action And Be Represented
By Bravo Law and Jordan Lewis PA

1. I, ROBERTO GOMEZ, consent to join the above-captioned lawsuit seeking damages for unpaid overtime wages brought under the Fair Labor Standards Act.


2. I am similarly situated to the named plaintiffs because, within the last two years:

- I have regularly worked over 40 hours per week as an unskilled manual laborer in the post Hurricane Irma reconstruction and restoration project in the Florida Keys beginning September 11, 2017 through the date of filing the instant action while employed for subcontractors of Defendant BELFOR, including but not limited to Defendant SAI, and have not been paid overtime compensation.

3. I authorize a steering committee composed of Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez to file and prosecute the above-captioned matter in my name, and I designate the steering committee to make decisions on my behalf concerning the litigation, including negotiating a resolution of my claims. While the steering committee is expected to attempt to reach consensus on issues, a simple majority vote will control.

4. I agree to be represented by the law firms of Bravo Law and Jordan Lewis, P.A., counsel for the named plaintiffs Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez.

5. If this case is conditionally certified and later decertified, I authorize the steering committee's counsel to reuse this consent form to re-file my claims in a separate or related action against Defendants.

Signature: 
Name: Roberto Gomez
Date: 10/01/2018

Address: c/o my counsel

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d/b/a STATEWIDE ASSOCIATES, INC.


Defendants.

Consent To Join Collective Action And Be Represented
By Bravo Law and Jordan Lewis PA

1. I, LUIS MALDONADO, consent to join the above-captioned lawsuit seeking damages for unpaid overtime wages brought under the Fair Labor Standards Act.
2. I am similarly situated to the named plaintiffs because, within the last two years:
 - I have regularly worked over 40 hours per week as an unskilled manual laborer in the post Hurricane Irma reconstruction and restoration project in the Florida Keys beginning September 11, 2017 through the date of filing the instant action while employed for subcontractors of Defendant BELFOR, including but not limited to Defendant SAI, and have not been paid overtime compensation.
3. I authorize a steering committee composed of Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez to file and prosecute the above-captioned matter in my name, and I designate the steering committee to make decisions on my behalf concerning the litigation, including negotiating a resolution of my claims. While the steering committee is expected to attempt to reach consensus on issues, a simple majority vote will control.

4. I agree to be represented by the law firms of Bravo Law and Jordan Lewis, P.A., counsel for the named plaintiffs Roberto Gomez, Luis Maldonado, Miriel Rodriguez and Orlando Rodriguez.

5. If this case is conditionally certified and later decertified, I authorize the steering committee's counsel to reuse this consent form to re-file my claims in a separate or related action against Defendants.

Signature:  _____
Name: Luis Maldonado
Date: 10/03/2018

Address: c/o my counsel

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Defendants.

_____ /

Consent To Join Collective Action And Be Represented
By Bravo Law and Jordan Lewis PA

1. I, MIRIEL RODRIGUEZ, consent to join the above-captioned lawsuit seeking damages for unpaid overtime wages brought under the Fair Labor Standards Act.


2. I am similarly situated to the named plaintiffs because, within the last two years:

- I have regularly worked over 40 hours per week as an unskilled manual laborer in the post Hurricane Irma reconstruction and restoration project in the Florida Keys beginning September 11, 2017 through the date of filing the instant action while employed for subcontractors of Defendant BELFOR, including but not limited to Defendant SAI, and have not been paid overtime compensation.

3. I authorize a steering committee composed of Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez to file and prosecute the above-captioned matter in my name, and I designate the steering committee to make decisions on my behalf concerning the litigation, including negotiating a resolution of my claims. While the steering committee is expected to attempt to reach consensus on issues, a simple majority vote will control.

4. I agree to be represented by the law firms of Bravo Law and Jordan Lewis, P.A., counsel for the named plaintiffs Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez.

5. If this case is conditionally certified and later decertified, I authorize the steering committee's counsel to reuse this consent form to re-file my claims in a separate or related action against Defendants.

Signature: 
Name: Miriel Rodriguez
Date: 10/10/2018

Address: c/o my counsel

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STATEWIDE SAI, INC.,
d/b/a STATEWIDE ASSOCIATES, INC.

Defendants.

_____ /

Consent To Join Collective Action And Be Represented
By Bravo Law and Jordan Lewis PA

1. I, ORLANDO RODRIGUEZ, consent to join the above-captioned lawsuit seeking damages for unpaid overtime wages brought under the Fair Labor Standards Act.


2. I am similarly situated to the named plaintiffs because, within the last two years:

- I have regularly worked over 40 hours per week as an unskilled manual laborer in the post Hurricane Irma reconstruction and restoration project in the Florida Keys beginning September 11, 2017 through the date of filing the instant action while employed for subcontractors of Defendant BELFOR, including but not limited to Defendant SAI, and have not been paid overtime compensation.

3. I authorize a steering committee composed of Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez to file and prosecute the above-captioned matter in my name, and I designate the steering committee to make decisions on my behalf concerning the litigation, including negotiating a resolution of my claims. While the steering committee is expected to attempt to reach consensus on issues, a simple majority vote will control.

4. I agree to be represented by the law firms of Bravo Law and Jordan Lewis, P.A., counsel for the named plaintiffs Roberto Gomez, Luis Maldonado, Miriel Rodriguez, and Orlando Rodriguez.

5. If this case is conditionally certified and later decertified, I authorize the steering committee's counsel to reuse this consent form to re-file my claims in a separate or related action against Defendants.

Signature: 
Name: Orlando Rodriguez
Date: 09/28/2018

Address: c/o my counsel

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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 Roberto Gomez, Luis Maldonado, Miriel Rodriguez & Orlando Rodriguez, and others
DEFENDANTS BELFOR USA Group, Inc., d/b/a BELFOR South Florida, & Statewide SAI, Inc., d/b/a Statewide

(b) County of Residence of First Listed Plaintiff Hillsborough County of Residence of First Listed Defendant Broward County
 (EXCEPT IN U.S. PLAINTIFF CASES) (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number) Attorneys (If Known)
 Gustavo A. Bravo, Esq. IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
 Bravo Law

(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)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	<input type="checkbox"/> Citizen of This State	<input type="checkbox"/> PTF 1	<input type="checkbox"/> DEF 1	<input type="checkbox"/> Incorporated or Principal Place of Business In This State	<input type="checkbox"/> PTF 4	<input type="checkbox"/> DEF 4
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<input type="checkbox"/> Citizen of Another State	<input type="checkbox"/> PTF 2	<input type="checkbox"/> DEF 2	<input type="checkbox"/> Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> PTF 5	<input type="checkbox"/> DEF 5
		<input type="checkbox"/> Citizen or Subject of a Foreign Country	<input type="checkbox"/> PTF 3	<input type="checkbox"/> DEF 3	<input type="checkbox"/> Foreign Nation	<input type="checkbox"/> PTF 6	<input type="checkbox"/> DEF 6

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: [Nature of Suit Code Descriptions](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729 (a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander		PROPERTY RIGHTS	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	LABOR	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input checked="" type="checkbox"/> 710 Fair Labor Standards Act	SOCIAL SECURITY	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 495 Securities/Commodities/Exchange
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
		<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
REAL PROPERTY	CIVIL RIGHTS			<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights			<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	PRISONER PETITIONS		<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	Habeas Corpus:		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 463 Alien Detainee		<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 444 Amer. w/Disabilities - Employment	Other:		
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 445 Amer. w/Disabilities - Other	<input type="checkbox"/> 530 General	IMMIGRATION	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 462 Naturalization Application	
		<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 465 Other Immigration Actions	
		<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

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 Reremanded 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):
 29 U.S.C. Section 201, et. seq., FLSA Overtime Violation, Fla. Chap. 448 Min. Wage Violation, Collective & Class
LENGTH OF TRIAL via 7-10 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 October 29, 2018 SIGNATURE OF ATTORNEY OF RECORD
 Gustavo A. Bravo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

ROBERTO GOMEZ,
LUIS MALDONADO,
MIRIEL RODRIGUEZ, and
ORLANDO RODRIGUEZ,

on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

BELFOR USA GROUP, INC.
d/b/a BELFOR SOUTH FLORIDA,
STATEWIDE SAI, INC.,
d/b/a STATEWIDE ASSOCIATES, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

BELFOR USA GROUP, INC.
d/b/a BELFOR SOUTH FLORIDA,
1520 S. Powerline Road, Suite A
Deerfield Beach, FL 33442

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it)- or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) -you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiffs' attorney, whose name and address are:

Gustavo A. Bravo, Esq.
BRAVO LAW
1555 Bonaventure Blvd., Suite 2007
Weston, FL 33326

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

ROBERTO GOMEZ,
LUIS MALDONADO,
MIRIEL RODRIGUEZ, and
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on behalf of themselves and
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Plaintiffs,

vs.

BELFOR USA GROUP, INC.
d/b/a BELFOR SOUTH FLORIDA,
STATEWIDE SAI, INC.,
d/b/a STATEWIDE ASSOCIATES, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

Statewide SAI, Inc.
d/b/a Statewide Associates, Inc.
ATTN: Thomas Little, Registered Agent
2123 NE Coachman Road, Suite A
Clearwater, FL 33765

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it)- or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) -you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiffs' attorney, whose name and address are:

Gustavo A. Bravo, Esq.
BRAVO LAW
1555 Bonaventure Blvd., Suite 2007
Weston, FL 33326

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Belfor South Florida, Statewide Associates Sued Over Allegedly Unpaid Wages](#)
