

UNITED STATES DISTRICT COURT

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[REDACTED]

[REDACTED]

Orleans. The workers traveled to the United States from their home countries of Bolivia, Peru

These sums were expended solely for the benefit of the Defendants, who never reimbursed the workers. The Defendants' failure to reimburse the workers' money in their first week of work was a violation of the Fair Labor Standards Act, 29 U.S.C. § 201 et seq. As a result of these expenditures, the workers earned substantially less than the minimum wage in their first week of work. Indeed, workers' high level of ongoing debt has left them in virtual debt peonage, since they can neither pay off their debt by working for the Defendants nor lawfully work for any other

Congress regulating commerce, and 29 U.S.C. § 216(b), this action arising under the FLSA.

2.2. This Court is empowered to issue a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202.

III. VENUE

3.1. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and (c).

IV. PARTIES

4.1. At all times relevant to this action, Plaintiffs and the other class members were H-2B temporary foreign workers within the meaning of 8 U.S.C. §1101(a)(15)(H)(ii)(b).

4.2. The work performed by the Plaintiffs and other class members for the Defendants occurred within this District.

4.3 At all times relevant to this action, the Plaintiffs and the other class members were

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Defendant employers.

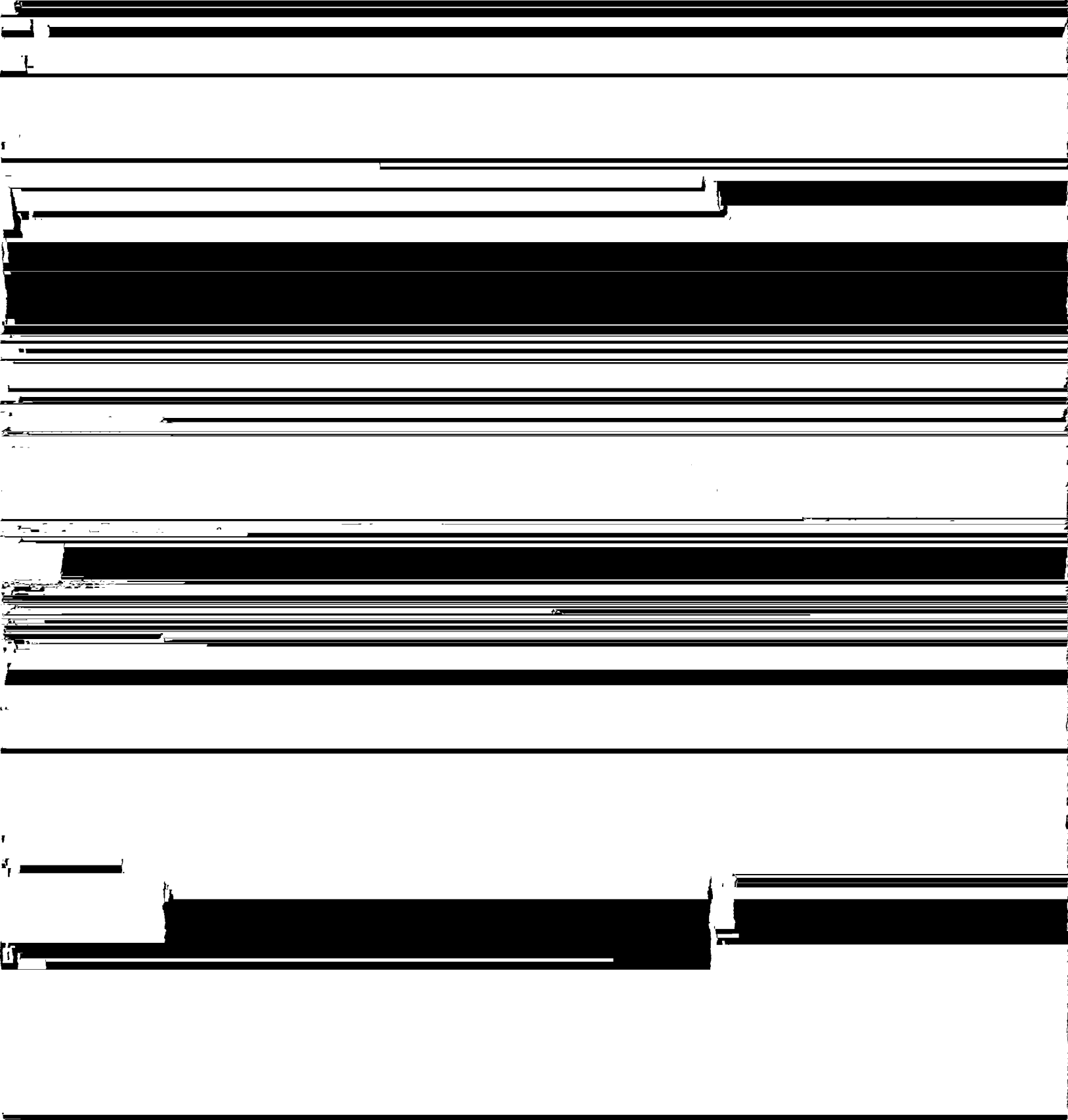
5.7. As a result of the enormous sums of money the Plaintiffs paid as a pre-condition of their employment by Defendants, which costs have never been reimbursed, Plaintiffs did not

pay the minimum wage in their first week of work. The Defendants thus failed to pay the

present action,

6.3. The precise number of individuals in the class is known only to the Defendants. The

class is believed to include at least three hundred individuals.



29 U.S.C. § 255(a).

CONFIDENTIAL - SECURITY INFORMATION

[REDACTED]

[REDACTED]

[REDACTED]

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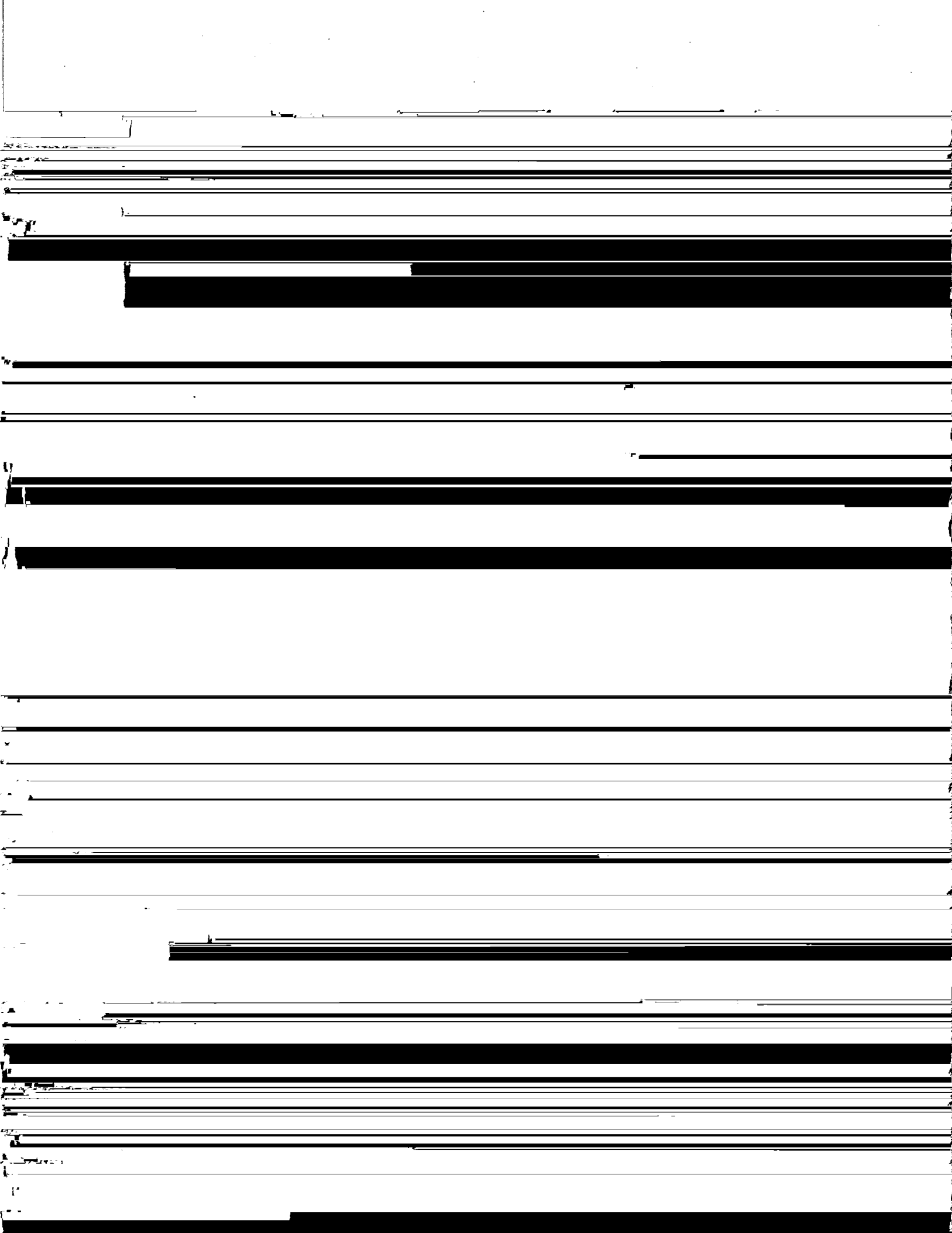
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