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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

2017 JUN 15 AM 10:14

_____)
 JOSE PEREZ, ALFREDO SANTOS,)
 and DOUGLAS RICHEY, on behalf of)
 themselves and all others similarly)
 situated,)
)
 Plaintiffs,)
)
 v.)
)
 OWL, INC. d/b/a/ OWL INC.)
 TRANSPORTATION,)
)
 Defendant.)
 _____)

U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

Case No. 6:17-cv-1092-URL-41-GJK

JURY DEMANDED

CLASS AND COLLECTIVE ACTION COMPLAINT

I. INTRODUCTION

1. This is a class and collective action brought by Jose Perez, Alfredo Santos, and Douglas Richey on behalf of current and former drivers who have worked for Defendant Owl, Inc. ("Owl"). Owl is a company that provides transportation services for veterans and other patients throughout Florida and several other states, pursuant to federal service contracts.

2. Throughout their employment, Owl's drivers routinely work more than 40 hours a week. Owl, however, fails to pay its drivers overtime when they work more than 40 hours in a week, in violation of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 207.

3. In addition, Owl has entered into contracts with the federal government, which require that Owl pay its drivers at prevailing wage rates determined by the United

States Department of Labor. Owl has also breached its contracts with Plaintiffs and other drivers by failing to pay them at the applicable prevailing wage rate for all hours worked. Although the work of the drivers indicates they should be paid at a minimum the prevailing wage for “ambulance drivers,” in accordance with the U.S. Department of Labor’s “Service Contract Act Directory of Occupations,” they are paid a much lower rate of pay.

4. Plaintiffs bring this action on behalf of themselves and on behalf of all others similarly situated, seeking reimbursement for overtime wages and prevailing wages, as well as liquidated damages, attorneys’ fees and costs, and interest.

II. JURISDICTION AND VENUE

5. Jurisdiction is conferred upon this Court by 29 U.S.C. § 216(b), since this action arises under the FLSA, and under 28 U.S.C. § 1331.

6. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Plaintiffs’ state law claim for breach of contract because that claim derives from a common nucleus of operative facts as the federal claim asserted herein.

7. Venue in the Middle District of Florida is proper pursuant to 28 U.S.C. §1391(b) because a substantial part of the unlawful conduct described herein occurred within this judicial district. Owl is incorporated in Florida and maintains a physical location within this judicial district.

II. THE PARTIES

8. Plaintiff Jose Perez is an adult resident of Orlando, Florida. From approximately August 2015 to April 2017, Mr. Perez worked for Owl, out of its offices in Orlando and Daytona Beach, transporting Veterans Administration patients.

9. Plaintiff Alfredo Santos is an adult resident of Longwood, Florida. From approximately May 2015 to the present, Mr. Santos has worked for Owl out of its office in Orlando transporting Veterans Administration patients.

10. Plaintiff Douglas Richey is an adult resident of Casselberry, Florida. From approximately January 2016 to the present, Mr. Richey has worked for Owl out of its office in Orlando transporting Veterans Administration patients.

11. Plaintiffs bring this action on behalf of a class of similarly situated individuals, namely, all other persons who have worked for Owl as drivers transporting patients.

12. Defendant Owl, Inc. is a Florida corporation, with its headquarters located in St. Johns, Florida.

III. STATEMENT OF FACTS

13. Owl contracts with federal agencies, including the Veterans Administration, to provide transportation of patients throughout Florida and in other states across the country, including California, Georgia, Missouri, North Carolina, South Carolina, Virginia, and Kansas.

14. Plaintiffs and class members are drivers who have been employed by Owl to provide transportation to patients who are unable to travel on their own, usually due to disabling conditions.

15. Owl has provided its drivers with modified vans and ambulances capable of carrying a passenger in a wheelchair or stretcher.

16. The drivers receive their daily assignments from Owl each morning, and they may receive additional assignments from Owl dispatchers throughout the day.

17. The drivers are responsible for driving to the patient's residence, loading the patient into the vehicle, including periodically lifting a patient out of a bed onto a stretcher, tying down the wheelchair or stretcher, securing oxygen tanks or other items of the patient, and then transporting the patient to a clinic or hospital for treatment.

18. At times, the drivers are required to work in pairs to restrain mentally ill patients who pose a danger to the driver and themselves.

19. Upon arrival at the clinic or hospital, the drivers are responsible for unloading the patient and transporting the patient to their appointment.

20. The drivers are further responsible for returning patients to their homes, which often include wheeling a patient into a house or carrying a stretcher patient into a bedroom.

21. The drivers are responsible for immediately cleaning up the vehicle in the event a patient throws up or human waste is spilled. In addition, drivers are expected to change soiled linens and dispose of medical waste.

22. Most of the drivers' work day is spent operating a van, transporting patients.

23. The drivers are given CPR training and are trained on how to handle patients in transit.

24. The drivers are required to inspect and clean the vans at the beginning and end of each work day, and on Fridays to thoroughly wash and clean both the inside and outside of the vans.

25. When the drivers are hired by Owl, they are typically given a short probationary period during which they are paid an hourly rate, typically \$10.99 per hour.

26. After the probationary period, Owl usually transfers drivers from the hourly pay schedule to an annual salary schedule of approximately \$26,400. Owl calls these salaried drivers “road supervisors.” Other than the change of title and the change from hourly to salary compensation, the work performed by the drivers remains the same. These so-called road supervisors do not supervise anyone and have no supervisory responsibilities. Plaintiffs Perez, Santos, and Richey are, or were, drivers classified as “road supervisors” and paid on a salary basis.

27. The salaried drivers are generally assigned to work five or six days a week and, on occasion, 7 days a week.

28. The salaried drivers often work nine to ten hours a day, and sometimes twelve or more hours during a work day.

29. The salaried drivers routinely work more than 40 hours in a work week but do not receive overtime pay.

30. Owl’s manager, Anthony Crittenden, repeatedly reaffirmed Owl’s unwillingness to pay overtime pay to drivers, including at a “drivers meeting” held on or about November 30, 2016.

31. In addition, Owl has paid its drivers far less than the prevailing wages and benefits required to be paid by employers who enter into federal contracts.

32. For example, the Department of Labor Wage Determination No. 2015-4553, “ambulance driver[s]” (listed under Occupation Code No. 12010) working under federal service contracts in Orange County, Florida, shows a prevailing wage of \$17.49 an hour for “ambulance drivers.” See Wage Determination No. 2015-4553 (rev. June 30, 2016) (attached as Ex. A). As of May 11, 2017, the prevailing wage for ambulance

drivers in Orange County, Florida, was raised to \$17.78 per hour. See Wage Determination No. 2015-4553 (rev. May 11, 2017) (attached as Ex. B).

33. The Wage Determinations state that the job titles and corresponding duties are drawn from the Service Contract Act Directory of Occupations.

34. Owl's drivers meet the definition for "ambulance driver" under the Service Contract Act Directory of Occupations.¹

35. However, rather than receiving these prevailing wage rates for "ambulance drivers," Owl drivers receive much lower rates of pay. The Plaintiffs and other class members regularly worked 50-60 hours in a week. Based on an estimate of just 50 hours a week, the \$26,400 annual salary of the drivers classified as "road supervisors" results in an hourly rate below the prevailing wage for ambulance drivers.²

COLLECTIVE ACTION ALLEGATIONS

36. Plaintiffs bring this FLSA claim for overtime pay on behalf of all of the following individuals who choose to opt in to this action pursuant to 29 U.S.C. § 216(b). Plaintiffs will request that the Court authorize the issuance of notice to these individuals, allowing them to opt in to this case:

All current and former employees of Owl, Inc. employed as drivers throughout the United States who worked more than 40 hours in a week

¹ An "Ambulance Driver drives an ambulance to transport sick, injured or convalescent persons, places patients on stretcher and loads stretcher into ambulance (usually with help of ambulance attendant), takes sick or injured persons to hospital or convalescents to destination, using knowledge and skill in driving to avoid sudden motions detrimental to patients, changes soiled linen on stretcher, administers first aid as needed; may shackle violent patients, and may report facts concerning accident or emergency to hospital personnel or law enforcement officials." Service Contract Act Directory of Occupations (Fifth Ed.) No. 12010 at p. 34.

² Even though Plaintiff and other class members meet the definition of "ambulance driver" under the Service Contract Act Directory of Occupations and must be paid at that rate, the drivers' pay was also below that required of "shuttle bus drivers," who are required to receive a prevailing wage of \$15.10 per hour. See Wage Determination Code No. 31290.

without receiving overtime pay since three years prior to the filing of the complaint.

37. Plaintiffs performed the same or similar work as these other drivers who may opt in to this case.

38. Plaintiffs and other drivers who may opt in to this case regularly work in excess of 40 hours per week.

39. Plaintiffs and other drivers who may opt in to this case are not exempt from receiving overtime pay under the FLSA. They are not bona fide executive, administrative, or professional employees; they do not meet the minimum salary threshold to qualify as exempt employees; nor do they fall under another exemption from overtime pay.

CLASS ACTION ALLEGATIONS

40. Plaintiffs' breach of contract claim for failure to pay the prevailing wage is brought by the Plaintiffs on behalf of the following class ("Rule 23 class"), pursuant to Fed. R. Civ. P. 23(b)(3):

All current and former employees of Owl, Inc. employed as drivers pursuant to federal service contracts throughout the United States who did not receive the prevailing wage for their work as determined by the United States Department of Labor, since five years prior to the filing of the complaint.

41. The members of the Rule 23 class are so numerous that joinder of all members is impracticable. Upon information and belief, there are more than forty (40) members of the proposed class. During the relevant statute of limitations, Owl has employed dozens of drivers in Florida alone, and upon information and belief, hundreds of other drivers throughout the United States.

42. Plaintiffs will fairly and adequately represent and protect the interests of the Rule 23 class because there is no conflict between the claims of Plaintiffs and those of the class, and Plaintiffs' claims are typical of the claims of the Rule 23 class. Plaintiffs' counsel are competent and experienced in litigating class actions and other complex litigation matters, including wage and hour cases like this one.

43. There are questions of law and fact common to the proposed Rule 23 class, which predominate over any questions affecting only individual class members, including, without limitation, whether Owl has violated and continues to violate the law through its policy or practice of not paying its drivers the required prevailing wage.

44. A class action is superior to other available methods for adjudication of this controversy because joinder of all members is impractical. Further, the amounts at stake for many of the Rule 23 class members, while substantial, are not great enough to enable them to maintain separate suits against Owl.

45. Without a class action, Owl will retain the benefit of its wrongdoing, which will result in further damages to Plaintiffs and the Rule 23 class. Plaintiffs envision no difficulty in the management of this action as a class action.

COUNT I
Fair Labor Standards Act
(Collective Action)

46. Plaintiffs reallege and incorporate by reference the allegations set forth in paragraphs 1 through 45 supra.

47. As set forth above, Defendant has violated the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 207, by failing to pay its drivers overtime pay for all hours worked in excess of 40 per workweek.

48. Defendant is an “employer” for the purposes of the FLSA, 29 U.S.C. §203(s), because it has employees handling or otherwise working on goods or materials that have been moved in or produced for commerce and is an enterprise whose annual gross sales or business of at least \$500,000.

49. Plaintiffs and other drivers who may opt in to this case are employees within the coverage of the FLSA and do not fall within any of the FLSA’s overtime exemptions, nor do they meet the salary test or the duties test for any exemption.

50. Plaintiffs and other drivers who may opt in to this case regularly work or worked more than 40 hours per workweek.

51. When a law other than the FLSA sets a minimum wage higher than that set by the FLSA, the “regular rate” is at least this higher minimum wage. 29 C.F.R. §778.5.

52. Plaintiffs and other drivers who may opt in to this case worked for Owl pursuant to federal contracts setting a prevailing wage higher than the minimum wage. See 41 U.S.C. § 6703(1); 29 C.F.R. § 4.6; Dep’t of Labor Wage Determination No. 2015-4553.

53. The prevailing wage rate for the work performed by Plaintiffs and other drivers who may opt in to this case is higher than the federal minimum wage and, thus, the prevailing wage is the regular rate of pay for determining the amount of overtime pay owed under the FLSA.

54. Defendant has engaged in and continues to engage in willful violations of the FLSA, since its conduct demonstrates that either it knows and has known that its

conduct violated the FLSA or has shown reckless disregard for whether its actions complied with the FLSA.

55. Pursuant to Section 216(b) of the FLSA, Defendant is liable to Plaintiffs and other drivers who may opt in to this case for unpaid overtime compensation at a rate based on the prevailing wage, plus an additional equal amount as liquidated damages, along with reasonable attorney's fees and costs of the action.

COUNT II
Breach of Contract
(Rule 23 Class Action)

56. Plaintiffs reallege and incorporate by reference the allegations set forth in paragraphs 1 through 45 supra.

57. Defendant's actions, as set forth above, constitute a breach of the employment contract between Defendant and its drivers.

58. The acceptance of an offer of employment with Defendant, and the law and regulations applicable to federal service contracts under the Service Contract Act and Contract Work Hours and Safety Standards Act, constitute the employment contract between Defendant and its drivers.

59. Plaintiffs and the other class members satisfactorily performed all employment duties and responsibilities required of them under their employment contracts with Defendant.

60. At all times relevant to this lawsuit, under federal service contracts exceeding \$2,500, employers have been required to pay employees a prevailing wage as determined by the Department of Labor. See 41 U.S.C. § 6703(1); 29 C.F.R. § 4.6.

61. Plaintiffs and the other class members' duties and responsibilities satisfy the job classification for "ambulance driver" under the Department of Labor's Service Contract Act Directory of Occupations (Fifth Ed.) No. 12010. The prevailing wage for "ambulance drivers" has been set between \$17.49 per hour and \$17.78 per hour.

62. Defendant breached the employment contracts with Plaintiffs and the other class members by compensating its drivers below the applicable prevailing wage for their work.

63. Defendant's breach of the employment contracts caused Plaintiffs and the other class members substantial injuries, for which Plaintiffs and the other class members are entitled to actual and consequential damages and prejudgment interest.

JURY DEMAND

Plaintiffs request a trial by jury on all of their claims.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs pray that this Court enter the following relief:

1. An order permitting this litigation to proceed as a collective action with respect to Count I and permitting Plaintiffs to notify fellow workers of their right to opt-in to this action to pursue a claim under the FLSA, pursuant to 29 U.S.C. 216(b);
2. An order certifying this case to proceed as a class action in accordance with Fed. R. Civ. P. 23(b)(3) with respect to Count II;
3. Granting judgment in favor of Plaintiffs and the other class members against Defendant Owl, Inc. on Plaintiffs and the other class members' claims for overtime pay under the FLSA and awarding them back pay equal to the amount of all

unpaid overtime for a period beginning three (3) years preceding the filing of this complaint, plus an additional equal amount in liquidated damages;

4. Granting judgment in favor of Plaintiffs and the other class members against Defendant Owl, Inc. for breach of the employment contracts with Plaintiffs and the other class members, and awarding each of the Plaintiffs and other class members their actual and consequential damages and prejudgment interest;

5. An award of back pay equal to the prevailing wage for ambulance drivers

6. An award attorney's fees and costs pursuant to 29 U.S.C. § 216(b);

7. Injunctive relief requiring Owl, Inc. to comply with all applicable federal and state laws and cease their illegal practices;

8. Any other relief to which the Plaintiffs and the Class members may be entitled.

DATED: June 15, 2017

Respectfully Submitted,
JOSE PEREZ, ALFREDO SANTOS,
and DOUGLAS RICHEY, individually
and on behalf of all others similarly
situated,

By their attorneys, ✓



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WD 15-4553 (Rev.-1) was first posted on www.wdol.gov on 07/05/2016

REGISTER OF WAGE DETERMINATIONS UNDER
THE SERVICE CONTRACT ACT
By direction of the Secretary of Labor

U.S. DEPARTMENT OF LABOR
EMPLOYMENT STANDARDS ADMINISTRATION
WAGE AND HOUR DIVISION
WASHINGTON D.C. 20210

Daniel W. Simms
Director

Division of
Wage Determinations

Wage Determination No.: 2015-4553
Revision No.: 1
Date Of Revision: 06/30/2016

Note: Under Executive Order (EO) 13658, an hourly minimum wage of \$10.15 for calendar year 2016 applies to all contracts subject to the Service Contract Act for which the solicitation was issued on or after January 1, 2015. If this contract is covered by the EO, the contractor must pay all workers in any classification listed on this wage determination at least \$10.15 per hour (or the applicable wage rate listed on this wage determination, if it is higher) for all hours spent performing on the contract in calendar year 2016. The EO minimum wage rate will be adjusted annually. Additional information on contractor requirements and worker protections under the EO is available at www.dol.gov/whd/govcontracts.

State: Florida

Area: Florida Counties of Orange, Osceola, Seminole

Fringe Benefits Required Follow the Occupational Listing

OCCUPATION CODE - TITLE	FOOTNOTE	RATE
01000 - Administrative Support And Clerical Occupations		
01011 - Accounting Clerk I		13.32
01012 - Accounting Clerk II		14.95
01013 - Accounting Clerk III		16.73
01020 - Administrative Assistant		21.44
01035 - Court Reporter		20.91
01041 - Customer Service Representative I		11.24
01042 - Customer Service Representative II		12.64
01043 - Customer Service Representative III		13.79
01051 - Data Entry Operator I		12.56
01052 - Data Entry Operator II		13.71
01060 - Dispatcher, Motor Vehicle		17.17
01070 - Document Preparation Clerk		12.27
01090 - Duplicating Machine Operator		12.43
01111 - General Clerk I		11.89
01112 - General Clerk II		12.97
01113 - General Clerk III		14.56
01120 - Housing Referral Assistant		18.54
01141 - Messenger Courier		12.41
01191 - Order Clerk I		12.75
01192 - Order Clerk II		13.91
01261 - Personnel Assistant (Employment) I		13.88
01262 - Personnel Assistant (Employment) II		15.77
01263 - Personnel Assistant (Employment) III		17.30
01270 - Production Control Clerk		19.71
01290 - Rental Clerk		13.74
01300 - Scheduler, Maintenance		14.87
01311 - Secretary I		14.87
01312 - Secretary II		16.64
01313 - Secretary III		18.54
01320 - Service Order Dispatcher		14.87
01410 - Supply Technician		21.79
01420 - Survey Worker		15.33
01460 - Switchboard Operator/Receptionist		12.68
01531 - Travel Clerk I		12.32
01532 - Travel Clerk II		12.86
01533 - Travel Clerk III		13.44
01611 - Word Processor I		14.54
01612 - Word Processor II		16.32
01613 - Word Processor III		18.25
05000 - Automotive Service Occupations		
05005 - Automobile Body Repairer, Fiberglass		19.71
05010 - Automotive Electrician		17.28
05040 - Automotive Glass Installer		16.36
05070 - Automotive Worker		16.36
05110 - Mobile Equipment Servicer		13.56
05130 - Motor Equipment Metal Mechanic		18.18
05160 - Motor Equipment Metal Worker		16.36
05190 - Motor Vehicle Mechanic		18.18
05220 - Motor Vehicle Mechanic Helper		13.10

EXHIBIT A

05250 - Motor Vehicle Upholstery Worker	15.80
05280 - Motor Vehicle Wrecker	16.37
05310 - Painter, Automotive	17.92
05340 - Radiator Repair Specialist	16.36
05370 - Tire Repairer	10.83
05400 - Transmission Repair Specialist	18.18
07000 - Food Preparation And Service Occupations	
07010 - Baker	11.80
07041 - Cook I	11.97
07042 - Cook II	13.63
07070 - Dishwasher	9.39
07130 - Food Service Worker	10.16
07210 - Meat Cutter	13.88
07260 - Waiter/Waitress	9.61
09000 - Furniture Maintenance And Repair Occupations	
09010 - Electrostatic Spray Painter	14.65
09040 - Furniture Handler	9.40
09080 - Furniture Refinisher	15.19
09090 - Furniture Refinisher Helper	11.24
09110 - Furniture Repairer, Minor	13.22
09130 - Upholsterer	15.61
11000 - General Services And Support Occupations	
11030 - Cleaner, Vehicles	10.22
11060 - Elevator Operator	10.22
11090 - Gardener	14.53
11122 - Housekeeping Aide	10.71
11150 - Janitor	10.71
11210 - Laborer, Grounds Maintenance	11.17
11240 - Maid or Houseman	9.74
11260 - Pruner	9.83
11270 - Tractor Operator	13.37
11330 - Trail Maintenance Worker	11.17
11360 - Window Cleaner	13.14
12000 - Health Occupations	
12010 - Ambulance Driver	17.49
12011 - Breath Alcohol Technician	16.89
12012 - Certified Occupational Therapist Assistant	27.49
12015 - Certified Physical Therapist Assistant	27.50
12020 - Dental Assistant	17.16
12025 - Dental Hygienist	32.73
12030 - EKG Technician	22.12
12035 - Electroneurodiagnostic Technologist	22.12
12040 - Emergency Medical Technician	17.49
12071 - Licensed Practical Nurse I	15.09
12072 - Licensed Practical Nurse II	16.89
12073 - Licensed Practical Nurse III	18.82
12100 - Medical Assistant	13.83
12130 - Medical Laboratory Technician	17.14
12160 - Medical Record Clerk	16.37
12190 - Medical Record Technician	16.38
12195 - Medical Transcriptionist	15.03
12210 - Nuclear Medicine Technologist	33.84
12221 - Nursing Assistant I	10.26
12222 - Nursing Assistant II	11.54
12223 - Nursing Assistant III	12.23
12224 - Nursing Assistant IV	13.71
12235 - Optical Dispenser	19.70
12236 - Optical Technician	16.81
12250 - Pharmacy Technician	15.85
12280 - Phlebotomist	13.64
12305 - Radiologic Technologist	22.77
12311 - Registered Nurse I	22.12
12312 - Registered Nurse II	27.06
12313 - Registered Nurse II, Specialist	27.06
12314 - Registered Nurse III	32.74
12315 - Registered Nurse III, Anesthetist	32.74
12316 - Registered Nurse IV	39.23
12317 - Scheduler (Drug and Alcohol Testing)	22.12
12320 - Substance Abuse Treatment Counselor	18.76
13000 - Information And Arts Occupations	
13011 - Exhibits Specialist I	18.37
13012 - Exhibits Specialist II	22.76
13013 - Exhibits Specialist III	27.81
13041 - Illustrator I	21.64
13042 - Illustrator II	25.12
13043 - Illustrator III	31.42
13047 - Librarian	27.87
13050 - Library Aide/Clerk	12.77
13054 - Library Information Technology Systems Administrator	25.12
13058 - Library Technician	14.97

13061 - Media Specialist I	16.50
13062 - Media Specialist II	18.47
13063 - Media Specialist III	20.58
13071 - Photographer I	13.91
13072 - Photographer II	15.91
13073 - Photographer III	19.29
13074 - Photographer IV	23.54
13075 - Photographer V	28.55
13090 - Technical Order Library Clerk	15.34
13110 - Video Teleconference Technician	17.85
14000 - Information Technology Occupations	
14041 - Computer Operator I	17.38
14042 - Computer Operator II	19.58
14043 - Computer Operator III	22.42
14044 - Computer Operator IV	24.72
14045 - Computer Operator V	27.37
14071 - Computer Programmer I	(see 1) 22.24
14072 - Computer Programmer II	(see 1) 27.56
14073 - Computer Programmer III	(see 1)
14074 - Computer Programmer IV	(see 1)
14101 - Computer Systems Analyst I	(see 1)
14102 - Computer Systems Analyst II	(see 1)
14103 - Computer Systems Analyst III	(see 1)
14150 - Peripheral Equipment Operator	17.38
14160 - Personal Computer Support Technician	24.72
14170 - System Support Specialist	24.34
15000 - Instructional Occupations	
15010 - Aircrew Training Devices Instructor (Non-Rated)	28.67
15020 - Aircrew Training Devices Instructor (Rated)	39.50
15030 - Air Crew Training Devices Instructor (Pilot)	41.13
15050 - Computer Based Training Specialist / Instructor	30.03
15060 - Educational Technologist	29.00
15070 - Flight Instructor (Pilot)	41.13
15080 - Graphic Artist	22.58
15085 - Maintenance Test Pilot, Fixed, Jet/Prop	38.68
15086 - Maintenance Test Pilot, Rotary Wing	38.68
15088 - Non-Maintenance Test/Co-Pilot	38.68
15090 - Technical Instructor	20.56
15095 - Technical Instructor/Course Developer	25.15
15110 - Test Proctor	16.59
15120 - Tutor	16.59
16000 - Laundry, Dry-Cleaning, Pressing And Related Occupations	
16010 - Assembler	9.87
16030 - Counter Attendant	9.87
16040 - Dry Cleaner	11.86
16070 - Finisher, Flatwork, Machine	9.87
16090 - Presser, Hand	9.87
16110 - Presser, Machine, Drycleaning	9.87
16130 - Presser, Machine, Shirts	9.87
16160 - Presser, Machine, Wearing Apparel, Laundry	9.87
16190 - Sewing Machine Operator	12.63
16220 - Tailor	13.27
16250 - Washer, Machine	10.50
19000 - Machine Tool Operation And Repair Occupations	
19010 - Machine-Tool Operator (Tool Room)	17.16
19040 - Tool And Die Maker	21.64
21000 - Materials Handling And Packing Occupations	
21020 - Forklift Operator	14.78
21030 - Material Coordinator	19.71
21040 - Material Expediter	19.71
21050 - Material Handling Laborer	10.95
21071 - Order Filler	11.41
21080 - Production Line Worker (Food Processing)	14.78
21110 - Shipping Packer	13.49
21130 - Shipping/Receiving Clerk	13.49
21140 - Store Worker I	10.18
21150 - Stock Clerk	14.51
21210 - Tools And Parts Attendant	14.78
21410 - Warehouse Specialist	14.78
23000 - Mechanics And Maintenance And Repair Occupations	
23010 - Aerospace Structural Welder	27.75
23019 - Aircraft Logs and Records Technician	21.97
23021 - Aircraft Mechanic I	26.17
23022 - Aircraft Mechanic II	27.75
23023 - Aircraft Mechanic III	35.39
23040 - Aircraft Mechanic Helper	19.38
23050 - Aircraft, Painter	24.42
23060 - Aircraft Servicer	21.97
23070 - Aircraft Survival Flight Equipment Technician	24.42
23080 - Aircraft Worker	23.53
23091 - Aircrew Life Support Equipment (ALSE) Mechanic	23.53

I		
23092	- Aircrew Life Support Equipment (ALSE) Mechanic	26.17
II		
23110	- Appliance Mechanic	18.09
23120	- Bicycle Repairer	13.72
23125	- Cable Splicer	24.89
23130	- Carpenter, Maintenance	17.26
23140	- Carpet Layer	17.92
23160	- Electrician, Maintenance	18.03
23181	- Electronics Technician Maintenance I	20.10
23182	- Electronics Technician Maintenance II	21.53
23183	- Electronics Technician Maintenance III	22.94
23260	- Fabric Worker	16.69
23290	- Fire Alarm System Mechanic	19.66
23310	- Fire Extinguisher Repairer	15.43
23311	- Fuel Distribution System Mechanic	20.91
23312	- Fuel Distribution System Operator	16.65
23370	- General Maintenance Worker	15.66
23380	- Ground Support Equipment Mechanic	26.14
23381	- Ground Support Equipment Servicer	21.95
23382	- Ground Support Equipment Worker	23.51
23391	- Gunsmith I	15.43
23392	- Gunsmith II	17.92
23393	- Gunsmith III	20.45
23410	- Heating, Ventilation And Air-Conditioning Mechanic	18.63
23411	- Heating, Ventilation And Air Contditioning Mechanic (Research Facility)	19.82
23430	- Heavy Equipment Mechanic	20.10
23440	- Heavy Equipment Operator	16.93
23460	- Instrument Mechanic	20.45
23465	- Laboratory/Shelter Mechanic	19.19
23470	- Laborer	12.73
23510	- Locksmith	17.34
23530	- Machinery Maintenance Mechanic	21.63
23550	- Machinist, Maintenance	18.64
23580	- Maintenance Trades Helper	12.84
23591	- Metrology Technician I	20.45
23592	- Metrology Technician II	21.67
23593	- Metrology Technician III	22.93
23640	- Millwright	22.85
23710	- Office Appliance Repairer	18.36
23760	- Painter, Maintenance	14.70
23790	- Pipefitter, Maintenance	17.79
23810	- Plumber, Maintenance	16.70
23820	- Pneudraulic Systems Mechanic	20.45
23850	- Rigger	20.99
23870	- Scale Mechanic	17.92
23890	- Sheet-Metal Worker, Maintenance	17.59
23910	- Small Engine Mechanic	15.94
23931	- Telecommunications Mechanic I	20.77
23932	- Telecommunications Mechanic II	22.02
23950	- Telephone Lineman	20.19
23960	- Welder, Combination, Maintenance	17.45
23965	- Well Driller	19.27
23970	- Woodcraft Worker	20.45
23980	- Woodworker	15.33
24000	- Personal Needs Occupations	
24550	- Case Manager	15.43
24570	- Child Care Attendant	11.67
24580	- Child Care Center Clerk	14.56
24610	- Chore Aide	10.14
24620	- Family Readiness And Support Services Coordinator	15.43
24630	- Homemaker	17.53
25000	- Plant And System Operations Occupations	
25010	- Boiler Tender	26.21
25040	- Sewage Plant Operator	21.18
25070	- Stationary Engineer	26.21
25190	- Ventilation Equipment Tender	14.80
25210	- Water Treatment Plant Operator	21.18
27000	- Protective Service Occupations	
27004	- Alarm Monitor	16.54
27007	- Baggage Inspector	11.12
27008	- Corrections Officer	20.09
27010	- Court Security Officer	20.47
27030	- Detection Dog Handler	16.11
27040	- Detention Officer	20.09
27070	- Firefighter	18.98
27101	- Guard I	11.12
27102	- Guard II	16.05

27131	- Police Officer I	23.56
27132	- Police Officer II	26.18
28000	- Recreation Occupations	
28041	- Carnival Equipment Operator	13.54
28042	- Carnival Equipment Repairer	14.72
28043	- Carnival Worker	10.52
28210	- Gate Attendant/Gate Tender	12.70
28310	- Lifeguard	11.34
28350	- Park Attendant (Aide)	14.24
28510	- Recreation Aide/Health Facility Attendant	10.37
28515	- Recreation Specialist	14.32
28630	- Sports Official	11.34
28690	- Swimming Pool Operator	17.85
29000	- Stevedoring/Longshoremen Occupational Services	
29010	- Blocker And Bracer	22.67
29020	- Hatch Tender	22.67
29030	- Line Handler	22.67
29041	- Stevedore I	20.01
29042	- Stevedore II	24.28
30000	- Technical Occupations	
30010	- Air Traffic Control Specialist, Center (HFO) (see 2)	36.92
30011	- Air Traffic Control Specialist, Station (HFO) (see 2)	25.46
30012	- Air Traffic Control Specialist, Terminal (HFO) (see 2)	28.04
30021	- Archeological Technician I	17.87
30022	- Archeological Technician II	19.99
30023	- Archeological Technician III	25.89
30030	- Cartographic Technician	25.56
30040	- Civil Engineering Technician	22.64
30051	- Cryogenic Technician I	23.22
30052	- Cryogenic Technician II	25.65
30061	- Drafter/CAD Operator I	17.87
30062	- Drafter/CAD Operator II	19.99
30063	- Drafter/CAD Operator III	22.30
30064	- Drafter/CAD Operator IV	27.43
30081	- Engineering Technician I	15.95
30082	- Engineering Technician II	17.87
30083	- Engineering Technician III	20.85
30084	- Engineering Technician IV	24.77
30085	- Engineering Technician V	30.30
30086	- Engineering Technician VI	36.66
30090	- Environmental Technician	17.42
30095	- Evidence Control Specialist	20.97
30210	- Laboratory Technician	18.95
30221	- Latent Fingerprint Technician I	21.51
30222	- Latent Fingerprint Technician II	23.76
30240	- Mathematical Technician	24.18
30361	- Paralegal/Legal Assistant I	19.15
30362	- Paralegal/Legal Assistant II	22.65
30363	- Paralegal/Legal Assistant III	27.70
30364	- Paralegal/Legal Assistant IV	33.61
30375	- Petroleum Supply Specialist	25.65
30390	- Photo-Optics Technician	24.77
30395	- Radiation Control Technician	25.65
30461	- Technical Writer I	21.40
30462	- Technical Writer II	26.17
30463	- Technical Writer III	30.15
30491	- Unexploded Ordnance (UXO) Technician I	23.46
30492	- Unexploded Ordnance (UXO) Technician II	28.39
30493	- Unexploded Ordnance (UXO) Technician III	34.03
30494	- Unexploded (UXO) Safety Escort	23.46
30495	- Unexploded (UXO) Sweep Personnel	23.46
30501	- Weather Forecaster I	23.22
30502	- Weather Forecaster II	28.25
30620	- Weather Observer, Combined Upper Air Or (see 2)	22.30
Surface Programs		
30621	- Weather Observer, Senior (see 2)	24.77
31000	- Transportation/Mobile Equipment Operation Occupations	
31010	- Airplane Pilot	28.39
31020	- Bus Aide	10.11
31030	- Bus Driver	16.76
31043	- Driver Courier	13.30
31260	- Parking and Lot Attendant	9.09
31290	- Shuttle Bus Driver	15.10
31310	- Taxi Driver	10.99
31361	- Truckdriver, Light	15.10
31362	- Truckdriver, Medium	16.10
31363	- Truckdriver, Heavy	18.56
31364	- Truckdriver, Tractor-Trailer	18.56
99000	- Miscellaneous Occupations	
99020	- Cabin Safety Specialist	13.84
99030	- Cashier	9.94

99050 - Desk Clerk	12.38
99095 - Embalmer	24.27
99130 - Flight Follower	23.46
99251 - Laboratory Animal Caretaker I	10.92
99252 - Laboratory Animal Caretaker II	11.53
99260 - Marketing Analyst	26.07
99310 - Mortician	26.85
99410 - Pest Controller	15.51
99510 - Photofinishing Worker	12.51
99710 - Recycling Laborer	17.06
99711 - Recycling Specialist	20.75
99730 - Refuse Collector	15.15
99810 - Sales Clerk	13.66
99820 - School Crossing Guard	10.16
99830 - Survey Party Chief	19.90
99831 - Surveying Aide	13.66
99832 - Surveying Technician	18.72
99840 - Vending Machine Attendant	12.90
99841 - Vending Machine Repairer	16.51
99842 - Vending Machine Repairer Helper	13.05

ALL OCCUPATIONS LISTED ABOVE RECEIVE THE FOLLOWING BENEFITS:

HEALTH & WELFARE: \$4.27 per hour or \$170.80 per week or \$740.13 per month

VACATION: 2 weeks paid vacation after 1 year of service with a contractor or successor, 3 weeks after 5 years, and 4 weeks after 15 years. Length of service includes the whole span of continuous service with the present contractor or successor, wherever employed, and with the predecessor contractors in the performance of similar work at the same Federal facility. (Reg. 29 CFR 4.173)

HOLIDAYS: A minimum of ten paid holidays per year: New Year's Day, Martin Luther King Jr.'s Birthday, Washington's Birthday, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans' Day, Thanksgiving Day, and Christmas Day. (A contractor may substitute for any of the named holidays another day off with pay in accordance with a plan communicated to the employees involved.) (See 29 CFR 4.174)

THE OCCUPATIONS WHICH HAVE NUMBERED FOOTNOTES IN PARENTHESES RECEIVE THE FOLLOWING:

1) COMPUTER EMPLOYEES: Under the SCA at section 8(b), this wage determination does not apply to any employee who individually qualifies as a bona fide executive, administrative, or professional employee as defined in 29 C.F.R. Part 541. Because most Computer System Analysts and Computer Programmers who are compensated at a rate not less than \$27.63 (or on a salary or fee basis at a rate not less than \$455 per week) an hour would likely qualify as exempt computer professionals, (29 C.F.R. 541.400) wage rates may not be listed on this wage determination for all occupations within those job families. In addition, because this wage determination may not list a wage rate for some or all occupations within those job families if the survey data indicates that the prevailing wage rate for the occupation equals or exceeds \$27.63 per hour conformances may be necessary for certain nonexempt employees. For example, if an individual employee is nonexempt but nevertheless performs duties within the scope of one of the Computer Systems Analyst or Computer Programmer occupations for which this wage determination does not specify an SCA wage rate, then the wage rate for that employee must be conformed in accordance with the conformance procedures described in the conformance note included on this wage determination.

Additionally, because job titles vary widely and change quickly in the computer industry, job titles are not determinative of the application of the computer professional exemption. Therefore, the exemption applies only to computer employees who satisfy the compensation requirements and whose primary duty consists of:

(1) The application of systems analysis techniques and procedures, including consulting with users, to determine hardware, software or system functional specifications;

(2) The design, development, documentation, analysis, creation, testing or modification of computer systems or programs, including prototypes, based on and related to user or system design specifications;

(3) The design, documentation, testing, creation or modification of computer programs related to machine operating systems; or

(4) A combination of the aforementioned duties, the performance of which requires the same level of skills. (29 C.F.R. 541.400).

2) AIR TRAFFIC CONTROLLERS AND WEATHER OBSERVERS - NIGHT PAY & SUNDAY PAY: If you work at night as part of a regular tour of duty, you will earn a night differential

and receive an additional 10% of basic pay for any hours worked between 6pm and 6am. If you are a full-time employed (40 hours a week) and Sunday is part of your regularly scheduled workweek, you are paid at your rate of basic pay plus a Sunday premium of 25% of your basic rate for each hour of Sunday work which is not overtime (i.e. occasional work on Sunday outside the normal tour of duty is considered overtime work).

**** HAZARDOUS PAY DIFFERENTIAL ****

An 8 percent differential is applicable to employees employed in a position that represents a high degree of hazard when working with or in close proximity to ordnance, explosives, and incendiary materials. This includes work such as screening, blending, dying, mixing, and pressing of sensitive ordnance, explosives, and pyrotechnic compositions such as lead azide, black powder and photoflash powder. All dry-house activities involving propellants or explosives. Demilitarization, modification, renovation, demolition, and maintenance operations on sensitive ordnance, explosives and incendiary materials. All operations involving re-grading and cleaning of artillery ranges.

A 4 percent differential is applicable to employees employed in a position that represents a low degree of hazard when working with, or in close proximity to ordnance, (or employees possibly adjacent to) explosives and incendiary materials which involves potential injury such as laceration of hands, face, or arms of the employee engaged in the operation, irritation of the skin, minor burns and the like; minimal damage to immediate or adjacent work area or equipment being used. All operations involving, unloading, storage, and hauling of ordnance, explosive, and incendiary ordnance material other than small arms ammunition. These differentials are only applicable to work that has been specifically designated by the agency for ordnance, explosives, and incendiary material differential pay.

**** UNIFORM ALLOWANCE ****

If employees are required to wear uniforms in the performance of this contract (either by the terms of the Government contract, by the employer, by the state or local law, etc.), the cost of furnishing such uniforms and maintaining (by laundering or dry cleaning) such uniforms is an expense that may not be borne by an employee where such cost reduces the hourly rate below that required by the wage determination. The Department of Labor will accept payment in accordance with the following standards as compliance:

The contractor or subcontractor is required to furnish all employees with an adequate number of uniforms without cost or to reimburse employees for the actual cost of the uniforms. In addition, where uniform cleaning and maintenance is made the responsibility of the employee, all contractors and subcontractors subject to this wage determination shall (in the absence of a bona fide collective bargaining agreement providing for a different amount, or the furnishing of contrary affirmative proof as to the actual cost), reimburse all employees for such cleaning and maintenance at a rate of \$3.35 per week (or \$.67 cents per day). However, in those instances where the uniforms furnished are made of "wash and wear" materials, may be routinely washed and dried with other personal garments, and do not require any special treatment such as dry cleaning, daily washing, or commercial laundering in order to meet the cleanliness or appearance standards set by the terms of the Government contract, by the contractor, by law, or by the nature of the work, there is no requirement that employees be reimbursed for uniform maintenance costs.

**** SERVICE CONTRACT ACT DIRECTORY OF OCCUPATIONS ****

The duties of employees under job titles listed are those described in the "Service Contract Act Directory of Occupations", Fifth Edition (Revision 1), dated September 2015, unless otherwise indicated.

**** REQUEST FOR AUTHORIZATION OF ADDITIONAL CLASSIFICATION AND WAGE RATE, Standard Form 1444 (SF-1444) ****

Conformance Process:

The contracting officer shall require that any class of service employee which is not listed herein and which is to be employed under the contract (i.e., the work to be performed is not performed by any classification listed in the wage determination), be classified by the contractor so as to provide a reasonable relationship (i.e., appropriate level of skill comparison) between such unlisted classifications and the classifications listed in the wage determination (See 29 CFR 4.6(b)(2)(i)). Such conforming procedures shall be initiated by the contractor prior to the performance of contract work by such unlisted class(es) of employees (See 29 CFR 4.6(b)(2)(ii)). The Wage and Hour Division shall make a final determination of conformed classification, wage rate, and/or fringe benefits which shall be paid to all employees performing in the classification from the first day of work on which contract work is performed by them in the classification. Failure to pay such unlisted employees the compensation agreed upon by the interested parties and/or fully determined by the Wage and Hour Division retroactive to the

date such class of employees commenced contract work shall be a violation of the Act and this contract. (See 29 CFR 4.6(b)(2)(v)). When multiple wage determinations are included in a contract, a separate SF-1444 should be prepared for each wage determination to which a class(es) is to be conformed.

The process for preparing a conformance request is as follows:

- 1) When preparing the bid, the contractor identifies the need for a conformed occupation(s) and computes a proposed rate(s).
- 2) After contract award, the contractor prepares a written report listing in order the proposed classification title(s), a Federal grade equivalency (FGE) for each proposed classification(s), job description(s), and rationale for proposed wage rate(s), including information regarding the agreement or disagreement of the authorized representative of the employees involved, or where there is no authorized representative, the employees themselves. This report should be submitted to the contracting officer no later than 30 days after such unlisted class(es) of employees performs any contract work.
- 3) The contracting officer reviews the proposed action and promptly submits a report of the action, together with the agency's recommendations and pertinent information including the position of the contractor and the employees, to the U.S. Department of Labor, Wage and Hour Division, for review (See 29 CFR 4.6(b)(2)(ii)).
- 4) Within 30 days of receipt, the Wage and Hour Division approves, modifies, or disapproves the action via transmittal to the agency contracting officer, or notifies the contracting officer that additional time will be required to process the request.
- 5) The contracting officer transmits the Wage and Hour Division's decision to the contractor.
- 6) Each affected employee shall be furnished by the contractor with a written copy of such determination or it shall be posted as a part of the wage determination (See 29 CFR 4.6(b)(2)(iii)).

Information required by the Regulations must be submitted on SF-1444 or bond paper.

When preparing a conformance request, the "Service Contract Act Directory of Occupations" should be used to compare job definitions to ensure that duties requested are not performed by a classification already listed in the wage determination. Remember, it is not the job title, but the required tasks that determine whether a class is included in an established wage determination. Conformances may not be used to artificially split, combine, or subdivide classifications listed in the wage determination (See 29 CFR 4.152(c)(1)).

WD 15-4553 (Rev.-3) was first posted on www.wdol.gov on 05/16/2017

REGISTER OF WAGE DETERMINATIONS UNDER
THE SERVICE CONTRACT ACT
By direction of the Secretary of Labor

U.S. DEPARTMENT OF LABOR
EMPLOYMENT STANDARDS ADMINISTRATION
WAGE AND HOUR DIVISION
WASHINGTON D.C. 20210

Daniel W. Simms Division of
Director Wage Determinations

Wage Determination No.: 2015-4553
Revision No.: 3
Date Of Revision: 05/11/2017

Note: Under Executive Order (EO) 13658, an hourly minimum wage of \$10.20 for calendar year 2017 applies to all contracts subject to the Service Contract Act for which the contract is awarded (and any solicitation was issued) on or after January 1, 2015. If this contract is covered by the EO, the contractor must pay all workers in any classification listed on this wage determination at least \$10.20 per hour (or the applicable wage rate listed on this wage determination, if it is higher) for all hours spent performing on the contract in calendar year 2017. The EO minimum wage rate will be adjusted annually. Additional information on contractor requirements and worker protections under the EO is available at www.dol.gov/whd/govcontracts.

State: Florida

Area: Florida Counties of Orange, Osceola, Seminole

****Fringe Benefits Required Follow the Occupational Listing****

OCCUPATION CODE - TITLE	FOOTNOTE	RATE
01000 - Administrative Support And Clerical Occupations		
01011 - Accounting Clerk I		13.48
01012 - Accounting Clerk II		15.13
01013 - Accounting Clerk III		16.93
01020 - Administrative Assistant		22.60
01035 - Court Reporter		20.91
01041 - Customer Service Representative I		11.59
01042 - Customer Service Representative II		13.03
01043 - Customer Service Representative III		14.22
01051 - Data Entry Operator I		12.58
01052 - Data Entry Operator II		13.73
01060 - Dispatcher, Motor Vehicle		17.17
01070 - Document Preparation Clerk		13.32
01090 - Duplicating Machine Operator		13.32
01111 - General Clerk I		12.05
01112 - General Clerk II		13.15
01113 - General Clerk III		14.77
01120 - Housing Referral Assistant		18.54
01141 - Messenger Courier		13.37
01191 - Order Clerk I		14.03
01192 - Order Clerk II		15.30
01261 - Personnel Assistant (Employment) I		14.51
01262 - Personnel Assistant (Employment) II		16.23
01263 - Personnel Assistant (Employment) III		18.08
01270 - Production Control Clerk		20.30
01290 - Rental Clerk		13.74
01300 - Scheduler, Maintenance		14.87
01311 - Secretary I		14.87
01312 - Secretary II		16.64
01313 - Secretary III		18.54
01320 - Service Order Dispatcher		14.87
01410 - Supply Technician		22.60
01420 - Survey Worker		15.33
01460 - Switchboard Operator/Receptionist		12.87
01531 - Travel Clerk I		12.32
01532 - Travel Clerk II		12.86
01533 - Travel Clerk III		13.44
01611 - Word Processor I		14.54
01612 - Word Processor II		16.32
01613 - Word Processor III		18.25
05000 - Automotive Service Occupations		
05005 - Automobile Body Repairer, Fiberglass		19.71
05010 - Automotive Electrician		17.28
05040 - Automotive Glass Installer		16.36
05070 - Automotive Worker		16.36
05110 - Mobile Equipment Servicer		13.56
05130 - Motor Equipment Metal Mechanic		18.18
05160 - Motor Equipment Metal Worker		16.36
05190 - Motor Vehicle Mechanic		18.18
05220 - Motor Vehicle Mechanic Helper		13.10

EXHIBIT B

05250 - Motor Vehicle Upholstery Worker	15.80
05280 - Motor Vehicle Wrecker	16.37
05310 - Painter, Automotive	17.92
05340 - Radiator Repair Specialist	16.36
05370 - Tire Repairer	10.83
05400 - Transmission Repair Specialist	18.18
07000 - Food Preparation And Service Occupations	
07010 - Baker	11.80
07041 - Cook I	12.51
07042 - Cook II	14.52
07070 - Dishwasher	9.94
07130 - Food Service Worker	10.48
07210 - Meat Cutter	14.40
07260 - Waiter/Waitress	10.33
09000 - Furniture Maintenance And Repair Occupations	
09010 - Electrostatic Spray Painter	14.65
09040 - Furniture Handler	9.64
09080 - Furniture Refinisher	15.19
09090 - Furniture Refinisher Helper	11.72
09110 - Furniture Repairer, Minor	13.78
09130 - Upholsterer	15.61
11000 - General Services And Support Occupations	
11030 - Cleaner, Vehicles	10.59
11060 - Elevator Operator	10.41
11090 - Gardener	14.98
11122 - Housekeeping Aide	10.71
11150 - Janitor	10.71
11210 - Laborer, Grounds Maintenance	11.33
11240 - Maid or Houseman	10.48
11260 - Pruner	10.06
11270 - Tractor Operator	13.78
11330 - Trail Maintenance Worker	11.33
11360 - Window Cleaner	13.14
12000 - Health Occupations	
12010 - Ambulance Driver	17.78
12011 - Breath Alcohol Technician	17.65
12012 - Certified Occupational Therapist Assistant	28.15
12015 - Certified Physical Therapist Assistant	28.63
12020 - Dental Assistant	17.26
12025 - Dental Hygienist	33.03
12030 - EKG Technician	24.33
12035 - Electroneurodiagnostic Technologist	24.33
12040 - Emergency Medical Technician	17.78
12071 - Licensed Practical Nurse I	15.78
12072 - Licensed Practical Nurse II	17.65
12073 - Licensed Practical Nurse III	19.67
12100 - Medical Assistant	14.35
12130 - Medical Laboratory Technician	17.14
12160 - Medical Record Clerk	17.99
12190 - Medical Record Technician	18.02
12195 - Medical Transcriptionist	15.03
12210 - Nuclear Medicine Technologist	34.45
12221 - Nursing Assistant I	10.33
12222 - Nursing Assistant II	11.62
12223 - Nursing Assistant III	12.68
12224 - Nursing Assistant IV	14.24
12235 - Optical Dispenser	19.70
12236 - Optical Technician	16.81
12250 - Pharmacy Technician	15.85
12280 - Phlebotomist	15.00
12305 - Radiologic Technologist	24.21
12311 - Registered Nurse I	22.12
12312 - Registered Nurse II	27.06
12313 - Registered Nurse II, Specialist	27.06
12314 - Registered Nurse III	32.74
12315 - Registered Nurse III, Anesthetist	32.74
12316 - Registered Nurse IV	39.23
12317 - Scheduler (Drug and Alcohol Testing)	22.12
12320 - Substance Abuse Treatment Counselor	18.76
13000 - Information And Arts Occupations	
13011 - Exhibits Specialist I	18.37
13012 - Exhibits Specialist II	22.76
13013 - Exhibits Specialist III	27.81
13041 - Illustrator I	21.64
13042 - Illustrator II	25.12
13043 - Illustrator III	31.42
13047 - Librarian	27.87
13050 - Library Aide/Clerk	12.77
13054 - Library Information Technology Systems Administrator	25.12
13058 - Library Technician	14.97

13061 - Media Specialist I	16.50
13062 - Media Specialist II	18.47
13063 - Media Specialist III	20.58
13071 - Photographer I	13.91
13072 - Photographer II	15.91
13073 - Photographer III	19.29
13074 - Photographer IV	23.54
13075 - Photographer V	28.55
13090 - Technical Order Library Clerk	15.49
13110 - Video Teleconference Technician	19.64
14000 - Information Technology Occupations	
14041 - Computer Operator I	17.38
14042 - Computer Operator II	19.58
14043 - Computer Operator III	22.42
14044 - Computer Operator IV	24.72
14045 - Computer Operator V	27.37
14071 - Computer Programmer I	(see 1) 22.24
14072 - Computer Programmer II	(see 1) 27.56
14073 - Computer Programmer III	(see 1)
14074 - Computer Programmer IV	(see 1)
14101 - Computer Systems Analyst I	(see 1)
14102 - Computer Systems Analyst II	(see 1)
14103 - Computer Systems Analyst III	(see 1)
14150 - Peripheral Equipment Operator	17.38
14160 - Personal Computer Support Technician	24.72
14170 - System Support Specialist	26.77
15000 - Instructional Occupations	
15010 - Aircrew Training Devices Instructor (Non-Rated)	28.67
15020 - Aircrew Training Devices Instructor (Rated)	39.50
15030 - Air Crew Training Devices Instructor (Pilot)	41.13
15050 - Computer Based Training Specialist / Instructor	30.03
15060 - Educational Technologist	29.00
15070 - Flight Instructor (Pilot)	41.13
15080 - Graphic Artist	22.58
15085 - Maintenance Test Pilot, Fixed, Jet/Prop	38.68
15086 - Maintenance Test Pilot, Rotary Wing	38.68
15088 - Non-Maintenance Test/Co-Pilot	38.68
15090 - Technical Instructor	20.56
15095 - Technical Instructor/Course Developer	25.15
15110 - Test Proctor	16.59
15120 - Tutor	16.59
16000 - Laundry, Dry-Cleaning, Pressing And Related Occupations	
16010 - Assembler	10.10
16030 - Counter Attendant	10.10
16040 - Dry Cleaner	12.14
16070 - Finisher, Flatwork, Machine	10.10
16090 - Presser, Hand	10.10
16110 - Presser, Machine, Drycleaning	10.10
16130 - Presser, Machine, Shirts	10.10
16160 - Presser, Machine, Wearing Apparel, Laundry	10.10
16190 - Sewing Machine Operator	12.93
16220 - Tailor	13.59
16250 - Washer, Machine	10.75
19000 - Machine Tool Operation And Repair Occupations	
19010 - Machine-Tool Operator (Tool Room)	18.88
19040 - Tool And Die Maker	23.80
21000 - Materials Handling And Packing Occupations	
21020 - Forklift Operator	16.26
21030 - Material Coordinator	20.30
21040 - Material Expediter	20.30
21050 - Material Handling Laborer	11.28
21071 - Order Filler	11.41
21080 - Production Line Worker (Food Processing)	16.26
21110 - Shipping Packer	13.79
21130 - Shipping/Receiving Clerk	13.79
21140 - Store Worker I	10.42
21150 - Stock Clerk	14.86
21210 - Tools And Parts Attendant	16.26
21410 - Warehouse Specialist	16.26
23000 - Mechanics And Maintenance And Repair Occupations	
23010 - Aerospace Structural Welder	30.53
23019 - Aircraft Logs and Records Technician	24.17
23021 - Aircraft Mechanic I	28.79
23022 - Aircraft Mechanic II	30.53
23023 - Aircraft Mechanic III	35.91
23040 - Aircraft Mechanic Helper	21.32
23050 - Aircraft, Painter	26.86
23060 - Aircraft Servicer	24.17
23070 - Aircraft Survival Flight Equipment Technician	26.86
23080 - Aircraft Worker	25.88
23091 - Aircrew Life Support Equipment (ALSE) Mechanic	25.88

I		
23092	- Aircrew Life Support Equipment (ALSE) Mechanic	28.79
II		
23110	- Appliance Mechanic	18.09
23120	- Bicycle Repairer	15.09
23125	- Cable Splicer	24.89
23130	- Carpenter, Maintenance	18.29
23140	- Carpet Layer	17.94
23160	- Electrician, Maintenance	18.23
23181	- Electronics Technician Maintenance I	22.11
23182	- Electronics Technician Maintenance II	23.68
23183	- Electronics Technician Maintenance III	25.23
23260	- Fabric Worker	16.72
23290	- Fire Alarm System Mechanic	20.22
23310	- Fire Extinguisher Repairer	15.46
23311	- Fuel Distribution System Mechanic	20.91
23312	- Fuel Distribution System Operator	16.65
23370	- General Maintenance Worker	15.66
23380	- Ground Support Equipment Mechanic	28.75
23381	- Ground Support Equipment Servicer	24.15
23382	- Ground Support Equipment Worker	25.86
23391	- Gunsmith I	15.46
23392	- Gunsmith II	17.94
23393	- Gunsmith III	20.48
23410	- Heating, Ventilation And Air-Conditioning Mechanic	20.49
23411	- Heating, Ventilation And Air Contditioning Mechanic (Research Facility)	21.80
23430	- Heavy Equipment Mechanic	20.10
23440	- Heavy Equipment Operator	17.72
23460	- Instrument Mechanic	22.50
23465	- Laboratory/Shelter Mechanic	19.22
23470	- Laborer	12.73
23510	- Locksmith	17.34
23530	- Machinery Maintenance Mechanic	22.56
23550	- Machinist, Maintenance	18.64
23580	- Maintenance Trades Helper	13.28
23591	- Metrology Technician I	22.50
23592	- Metrology Technician II	23.84
23593	- Metrology Technician III	25.22
23640	- Millwright	23.00
23710	- Office Appliance Repairer	18.81
23760	- Painter, Maintenance	14.70
23790	- Pipefitter, Maintenance	18.53
23810	- Plumber, Maintenance	17.39
23820	- Pneudraulic Systems Mechanic	20.48
23850	- Rigger	20.99
23870	- Scale Mechanic	17.94
23890	- Sheet-Metal Worker, Maintenance	17.81
23910	- Small Engine Mechanic	16.01
23931	- Telecommunications Mechanic I	20.77
23932	- Telecommunications Mechanic II	22.02
23950	- Telephone Lineman	20.19
23960	- Welder, Combination, Maintenance	17.45
23965	- Well Driller	19.27
23970	- Woodcraft Worker	20.48
23980	- Woodworker	15.46
24000	- Personal Needs Occupations	
24550	- Case Manager	15.43
24570	- Child Care Attendant	11.67
24580	- Child Care Center Clerk	14.56
24610	- Chore Aide	10.15
24620	- Family Readiness And Support Services Coordinator	15.43
24630	- Homemaker	17.53
25000	- Plant And System Operations Occupations	
25010	- Boiler Tender	28.83
25040	- Sewage Plant Operator	21.55
25070	- Stationary Engineer	28.83
25190	- Ventilation Equipment Tender	16.28
25210	- Water Treatment Plant Operator	21.55
27000	- Protective Service Occupations	
27004	- Alarm Monitor	17.03
27007	- Baggage Inspector	11.12
27008	- Corrections Officer	20.09
27010	- Court Security Officer	20.47
27030	- Detection Dog Handler	16.11
27040	- Detention Officer	20.09
27070	- Firefighter	19.67
27101	- Guard I	11.12
27102	- Guard II	16.05

27131 - Police Officer I	23.56
27132 - Police Officer II	26.18
28000 - Recreation Occupations	
28041 - Carnival Equipment Operator	13.70
28042 - Carnival Equipment Repairer	14.90
28043 - Carnival Worker	10.52
28210 - Gate Attendant/Gate Tender	12.93
28310 - Lifeguard	11.34
28350 - Park Attendant (Aide)	14.46
28510 - Recreation Aide/Health Facility Attendant	10.55
28515 - Recreation Specialist	15.75
28630 - Sports Official	11.51
28690 - Swimming Pool Operator	17.85
29000 - Stevedoring/Longshoremen Occupational Services	
29010 - Blocker And Bracer	24.39
29020 - Hatch Tender	24.39
29030 - Line Handler	24.39
29041 - Stevedore I	22.01
29042 - Stevedore II	26.13
30000 - Technical Occupations	
30010 - Air Traffic Control Specialist, Center (HFO) (see 2)	37.52
30011 - Air Traffic Control Specialist, Station (HFO) (see 2)	25.87
30012 - Air Traffic Control Specialist, Terminal (HFO) (see 2)	28.49
30021 - Archeological Technician I	17.87
30022 - Archeological Technician II	19.99
30023 - Archeological Technician III	25.89
30030 - Cartographic Technician	25.56
30040 - Civil Engineering Technician	22.64
30051 - Cryogenic Technician I	25.45
30052 - Cryogenic Technician II	28.11
30061 - Drafter/CAD Operator I	17.87
30062 - Drafter/CAD Operator II	19.99
30063 - Drafter/CAD Operator III	22.30
30064 - Drafter/CAD Operator IV	27.43
30081 - Engineering Technician I	15.95
30082 - Engineering Technician II	17.87
30083 - Engineering Technician III	20.85
30084 - Engineering Technician IV	24.77
30085 - Engineering Technician V	30.30
30086 - Engineering Technician VI	36.66
30090 - Environmental Technician	17.42
30095 - Evidence Control Specialist	22.97
30210 - Laboratory Technician	18.95
30221 - Latent Fingerprint Technician I	21.51
30222 - Latent Fingerprint Technician II	23.76
30240 - Mathematical Technician	24.18
30361 - Paralegal/Legal Assistant I	19.15
30362 - Paralegal/Legal Assistant II	23.31
30363 - Paralegal/Legal Assistant III	28.52
30364 - Paralegal/Legal Assistant IV	34.50
30375 - Petroleum Supply Specialist	28.11
30390 - Photo-Optics Technician	24.77
30395 - Radiation Control Technician	28.11
30461 - Technical Writer I	21.50
30462 - Technical Writer II	26.31
30463 - Technical Writer III	31.83
30491 - Unexploded Ordnance (UXO) Technician I	23.85
30492 - Unexploded Ordnance (UXO) Technician II	28.85
30493 - Unexploded Ordnance (UXO) Technician III	34.58
30494 - Unexploded (UXO) Safety Escort	23.85
30495 - Unexploded (UXO) Sweep Personnel	23.85
30501 - Weather Forecaster I	25.45
30502 - Weather Forecaster II	30.95
30620 - Weather Observer, Combined Upper Air Or (see 2)	22.30
Surface Programs	
30621 - Weather Observer, Senior (see 2)	24.77
31000 - Transportation/Mobile Equipment Operation Occupations	
31010 - Airplane Pilot	28.85
31020 - Bus Aide	11.12
31030 - Bus Driver	17.24
31043 - Driver Courier	13.30
31260 - Parking and Lot Attendant	9.25
31290 - Shuttle Bus Driver	15.10
31310 - Taxi Driver	10.99
31361 - Truckdriver, Light	15.10
31362 - Truckdriver, Medium	16.10
31363 - Truckdriver, Heavy	18.56
31364 - Truckdriver, Tractor-Trailer	18.56
99000 - Miscellaneous Occupations	
99020 - Cabin Safety Specialist	14.07
99030 - Cashier	9.94

99050 - Desk Clerk	12.38
99095 - Embalmer	26.70
99130 - Flight Follower	23.85
99251 - Laboratory Animal Caretaker I	11.59
99252 - Laboratory Animal Caretaker II	12.60
99260 - Marketing Analyst	26.07
99310 - Mortician	29.54
99410 - Pest Controller	15.51
99510 - Photofinishing Worker	12.51
99710 - Recycling Laborer	17.06
99711 - Recycling Specialist	20.75
99730 - Refuse Collector	15.15
99810 - Sales Clerk	13.66
99820 - School Crossing Guard	10.98
99830 - Survey Party Chief	19.90
99831 - Surveying Aide	13.66
99832 - Surveying Technician	18.72
99840 - Vending Machine Attendant	12.90
99841 - Vending Machine Repairer	16.51
99842 - Vending Machine Repairer Helper	13.05

Note: Executive Order (EO) 13706, Establishing Paid Sick Leave for Federal Contractors, applies to all contracts subject to the Service Contract Act for which the contract is awarded (and any solicitation was issued) on or after January 1, 2017. If this contract is covered by the EO, the contractor must provide employees with 1 hour of paid sick leave for every 30 hours they work, up to 56 hours of paid sick leave each year. Employees must be permitted to use paid sick leave for their own illness, injury or other health-related needs, including preventive care; to assist a family member (or person who is like family to the employee) who is ill, injured, or has other health-related needs, including preventive care; or for reasons resulting from, or to assist a family member (or person who is like family to the employee) who is the victim of, domestic violence, sexual assault, or stalking. Additional information on contractor requirements and worker protections under the EO is available at www.dol.gov/whd/govcontracts.

ALL OCCUPATIONS LISTED ABOVE RECEIVE THE FOLLOWING BENEFITS:

HEALTH & WELFARE: \$4.27 per hour or \$170.80 per week or \$740.13 per month

VACATION: 2 weeks paid vacation after 1 year of service with a contractor or successor, 3 weeks after 5 years, and 4 weeks after 15 years. Length of service includes the whole span of continuous service with the present contractor or successor, wherever employed, and with the predecessor contractors in the performance of similar work at the same Federal facility. (Reg. 29 CFR 4.173)

HOLIDAYS: A minimum of ten paid holidays per year: New Year's Day, Martin Luther King Jr.'s Birthday, Washington's Birthday, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans' Day, Thanksgiving Day, and Christmas Day. (A contractor may substitute for any of the named holidays another day off with pay in accordance with a plan communicated to the employees involved.) (See 29 CFR 4.174)

THE OCCUPATIONS WHICH HAVE NUMBERED FOOTNOTES IN PARENTHESES RECEIVE THE FOLLOWING:

1) COMPUTER EMPLOYEES: Under the SCA at section 8(b), this wage determination does not apply to any employee who individually qualifies as a bona fide executive, administrative, or professional employee as defined in 29 C.F.R. Part 541. Because most Computer System Analysts and Computer Programmers who are compensated at a rate not less than \$27.63 (or on a salary or fee basis at a rate not less than \$455 per week) an hour would likely qualify as exempt computer professionals, (29 C.F.R. 541.400) wage rates may not be listed on this wage determination for all occupations within those job families. In addition, because this wage determination may not list a wage rate for some or all occupations within those job families if the survey data indicates that the prevailing wage rate for the occupation equals or exceeds \$27.63 per hour conformances may be necessary for certain nonexempt employees. For example, if an individual employee is nonexempt but nevertheless performs duties within the scope of one of the Computer Systems Analyst or Computer Programmer occupations for which this wage determination does not specify an SCA wage rate, then the wage rate for that employee must be conformed in accordance with the conformance procedures described in the conformance note included on this wage determination.

Additionally, because job titles vary widely and change quickly in the computer industry, job titles are not determinative of the application of the computer professional exemption. Therefore, the exemption applies only to computer employees who satisfy the compensation requirements and whose primary duty consists of:

(1) The application of systems analysis techniques and procedures, including consulting with users, to determine hardware, software or system functional specifications;

(2) The design, development, documentation, analysis, creation, testing or modification of computer systems or programs, including prototypes, based on and related to user or system design specifications;

(3) The design, documentation, testing, creation or modification of computer programs related to machine operating systems; or

(4) A combination of the aforementioned duties, the performance of which requires the same level of skills. (29 C.F.R. 541.400).

2) AIR TRAFFIC CONTROLLERS AND WEATHER OBSERVERS - NIGHT PAY & SUNDAY PAY: If you work at night as part of a regular tour of duty, you will earn a night differential and receive an additional 10% of basic pay for any hours worked between 6pm and 6am. If you are a full-time employed (40 hours a week) and Sunday is part of your regularly scheduled workweek, you are paid at your rate of basic pay plus a Sunday premium of 25% of your basic rate for each hour of Sunday work which is not overtime (i.e. occasional work on Sunday outside the normal tour of duty is considered overtime work).

**** HAZARDOUS PAY DIFFERENTIAL ****

An 8 percent differential is applicable to employees employed in a position that represents a high degree of hazard when working with or in close proximity to ordnance, explosives, and incendiary materials. This includes work such as screening, blending, dying, mixing, and pressing of sensitive ordnance, explosives, and pyrotechnic compositions such as lead azide, black powder and photoflash powder. All dry-house activities involving propellants or explosives. Demilitarization, modification, renovation, demolition, and maintenance operations on sensitive ordnance, explosives and incendiary materials. All operations involving re-grading and cleaning of artillery ranges.

A 4 percent differential is applicable to employees employed in a position that represents a low degree of hazard when working with, or in close proximity to ordnance, (or employees possibly adjacent to) explosives and incendiary materials which involves potential injury such as laceration of hands, face, or arms of the employee engaged in the operation, irritation of the skin, minor burns and the like; minimal damage to immediate or adjacent work area or equipment being used. All operations involving, unloading, storage, and hauling of ordnance, explosive, and incendiary ordnance material other than small arms ammunition. These differentials are only applicable to work that has been specifically designated by the agency for ordnance, explosives, and incendiary material differential pay.

**** UNIFORM ALLOWANCE ****

If employees are required to wear uniforms in the performance of this contract (either by the terms of the Government contract, by the employer, by the state or local law, etc.), the cost of furnishing such uniforms and maintaining (by laundering or dry cleaning) such uniforms is an expense that may not be borne by an employee where such cost reduces the hourly rate below that required by the wage determination. The Department of Labor will accept payment in accordance with the following standards as compliance:

The contractor or subcontractor is required to furnish all employees with an adequate number of uniforms without cost or to reimburse employees for the actual cost of the uniforms. In addition, where uniform cleaning and maintenance is made the responsibility of the employee, all contractors and subcontractors subject to this wage determination shall (in the absence of a bona fide collective bargaining agreement providing for a different amount, or the furnishing of contrary affirmative proof as to the actual cost), reimburse all employees for such cleaning and maintenance at a rate of \$3.35 per week (or \$.67 cents per day). However, in those instances where the uniforms furnished are made of "wash and wear" materials, may be routinely washed and dried with other personal garments, and do not require any special treatment such as dry cleaning, daily washing, or commercial laundering in order to meet the cleanliness or appearance standards set by the terms of the Government contract, by the contractor, by law, or by the nature of the work, there is no requirement that employees be reimbursed for uniform maintenance costs.

**** SERVICE CONTRACT ACT DIRECTORY OF OCCUPATIONS ****

The duties of employees under job titles listed are those described in the "Service Contract Act Directory of Occupations", Fifth Edition (Revision 1), dated September 2015, unless otherwise indicated.

**** REQUEST FOR AUTHORIZATION OF ADDITIONAL CLASSIFICATION AND WAGE RATE, Standard Form 1444 (SF-1444) ****

Conformance Process:

The contracting officer shall require that any class of service employee which is

not listed herein and which is to be employed under the contract (i.e., the work to be performed is not performed by any classification listed in the wage determination), be classified by the contractor so as to provide a reasonable relationship (i.e., appropriate level of skill comparison) between such unlisted classifications and the classifications listed in the wage determination (See 29 CFR 4.6(b)(2)(i)). Such conforming procedures shall be initiated by the contractor prior to the performance of contract work by such unlisted class(es) of employees (See 29 CFR 4.6(b)(2)(ii)). The Wage and Hour Division shall make a final determination of conformed classification, wage rate, and/or fringe benefits which shall be paid to all employees performing in the classification from the first day of work on which contract work is performed by them in the classification. Failure to pay such unlisted employees the compensation agreed upon by the interested parties and/or fully determined by the Wage and Hour Division retroactive to the date such class of employees commenced contract work shall be a violation of the Act and this contract. (See 29 CFR 4.6(b)(2)(v)). When multiple wage determinations are included in a contract, a separate SF-1444 should be prepared for each wage determination to which a class(es) is to be conformed.

The process for preparing a conformance request is as follows:

- 1) When preparing the bid, the contractor identifies the need for a conformed occupation(s) and computes a proposed rate(s).
- 2) After contract award, the contractor prepares a written report listing in order the proposed classification title(s), a Federal grade equivalency (FGE) for each proposed classification(s), job description(s), and rationale for proposed wage rate(s), including information regarding the agreement or disagreement of the authorized representative of the employees involved, or where there is no authorized representative, the employees themselves. This report should be submitted to the contracting officer no later than 30 days after such unlisted class(es) of employees performs any contract work.
- 3) The contracting officer reviews the proposed action and promptly submits a report of the action, together with the agency's recommendations and pertinent information including the position of the contractor and the employees, to the U.S. Department of Labor, Wage and Hour Division, for review (See 29 CFR 4.6(b)(2)(ii)).
- 4) Within 30 days of receipt, the Wage and Hour Division approves, modifies, or disapproves the action via transmittal to the agency contracting officer, or notifies the contracting officer that additional time will be required to process the request.
- 5) The contracting officer transmits the Wage and Hour Division's decision to the contractor.
- 6) Each affected employee shall be furnished by the contractor with a written copy of such determination or it shall be posted as a part of the wage determination (See 29 CFR 4.6(b)(2)(iii)).

Information required by the Regulations must be submitted on SF-1444 or bond paper.

When preparing a conformance request, the "Service Contract Act Directory of Occupations" should be used to compare job definitions to ensure that duties requested are not performed by a classification already listed in the wage determination. Remember, it is not the job title, but the required tasks that determine whether a class is included in an established wage determination. Conformances may not be used to artificially split, combine, or subdivide classifications listed in the wage determination (See 29 CFR 4.152(c)(1)).

JS 44 (Rev. 11/15)

CIVIL COVER SHEET

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.)

I. (a) PLAINTIFFS
 José Perez, Alfredo Santos, and Douglas Richey, on behalf of themselves and all others similarly situated,

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Egan, Lev, Lindstrom & Siwica, P.A., P.O. Box 2231, Orlando, FL 32802
 Tel. (407) 422-1400; Lichten & Liss-Riordan, P.C., 729 Boylston Street
 Suite 2000, Boston, MA 02116; Tel. (617) 994-5800

DEFENDANTS
 Owl Inc. d/b/a Owl Inc. Transportation

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

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

Attorneys (If Known)

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

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

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

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

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

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <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 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation

VI. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 207

Brief description of cause:
 Unpaid wages and unjust enrichment

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

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____

DATE: 06/15/2017 SIGNATURE OF ATTORNEY OF RECORD:

FOR OFFICE USE ONLY: RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Owl Inc. Transportation Short Changes Ambulance Drivers](#)
