

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
AT KANSAS CITY**

KEITH E. BARNWELL)
1448 Ohio)
Leavenworth, KS 66048)

JURY TRIAL DEMANDED

FEANJA D. SMITH)
1709 S. 5th Street)
Leavenworth, KS 66048)

JAMES E. SMITH)
1709 S. 5th Street)
Leavenworth, KS 66048)

DELIA C. RAMIREZ)
503 Rio Tamesis)
Laredo, TX 78046)

Case no.: 08-CV-2151-JWL/DJW

FROYLAN MOYA)
11174 Carrizo)
Laredo, TX 78046)

TRISTAN L. GATES)
6352 County Rd. 3175 East)
Long Branch, TX 75669)

HORACIO MARTINEZ)
629 West 6th Street)
Las Animas, CO 81054)

SCOTT GREGG)
6505 Lake Suzzanne Ct.)
Panama City, FL 3204)

JANET L. BLACK)
1001 Huntington Drive)
Panama City, FL 32401)

JANET L. TOOLE)
5103 E. 12th Street)
Panama City, FL 32404)

JESSICA C. RICE)
75 S. Sycamore Street)

Florence, AZ 85232)
)
JOHN A. CONLEY)
 351 N. Peart Rd. #1416)
 Casa Grande, AZ 85222)
)
KENNETH E. DAVIS, III)
 P.O. Box 2456)
 Arizona City, AZ 85223)
)
THOMAS L. VINSON)
 P.O. Box 808)
 Arizona City, AZ 85223)
)
LISA L. MATHEY)
 3465 W. Quail Dr.)
 Tolter, AZ 85231)
)
 On Behalf of Themselves and)
 All Others Similarly Situated,)
)
 Plaintiffs,)
)
 vs.)
)
CORRECTIONS CORPORATION)
OF AMERICA)
 A Maryland Corporation)
 Registered Agent:)
 The Corporation Company, Inc.)
 515 South Kansas Ave.)
 Topeka, KS 66603)
)
 Defendant.)

FIRST AMENDED COMPLAINT
Collective Action Under the FLSA

COME NOW the Plaintiffs Keith E. Barnwell, Feanja D. Smith, Edward E. Smith, Delia C. Ramirez, Froylan Moya, Tristan L. Gates, Horacio Martinez, Scott Greg, Janet L. Black, Janet Toole, Jessica C. Rice, John A. Conley, Kenneth E. Davis, Thomas L. Vinson, and Lisa L. Mathey on behalf of themselves, and all others similarly situated, by and through counsel, and

hereby set forth this representative action for violation of the Fair Labor Standards Act under 29 U.S.C. §216(b) as follows:

PRELIMINARY STATEMENT

1. Plaintiffs bring this action against Defendant Corrections Corporation of American (“CCA”) for unpaid compensation and overtime compensation and related penalties and damages. Defendant’s practice and policy is to willfully fail and refuse to properly pay compensation and overtime compensation due Plaintiffs, and all other similarly situated employees, in the positions of corrections officers and other hourly non-exempt employees. In particular, Defendant requires such persons to be present at work and perform work, both before and after their shifts, but fails to compensate them accordingly. Doing so is direct in violation of the Fair Labor Standards Act, 29 U.S.C. §201 *et seq.* (FLSA).
2. Defendant’s practices are in direct violation of the FLSA, and Plaintiffs seek injunctive and declaratory relief; compensation for work performed, overtime premiums for all overtime work required, suffered, or permitted by Defendant; liquidated and/or other damages as permitted by applicable law; and attorney’s fees, costs, and expenses incurred in this action.

PARTIES

3. Plaintiff Keith E. Barnwell currently resides at 1448 Ohio, Leavenworth, Kansas. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant’s Leavenworth Detention Center facility, 100 Highway Terrace, Leavenworth, Kansas.

4. Plaintiff Feanja D. Smith currently resides 1709 S. 5th Street, Leavenworth, Kansas. Plaintiff has been employed as a corrections officer, corrections counselor, and case manager for the Defendant. Plaintiff works at Defendant's Leavenworth Detention Center facility, 100 Highway Terrace, Leavenworth, Kansas.
5. Plaintiff James E. Smith currently resides 1709 S. 5th Street, Leavenworth, Kansas. Plaintiff is employed as a corrections officer for the Defendant. Plaintiff works at Defendant's Leavenworth Detention Center facility, 100 Highway Terrace, Leavenworth, Kansas.
6. Plaintiff Horacio Martinez currently resides at 629 W. 6th Street, Las Animas, Colorado. Plaintiff is employed as a corrections officer for the Defendant. Plaintiff works at Defendant's Bent County Correction Facility, Las Animas, Colorado.
7. Plaintiff Scott Gregg currently resides at 6505 Lake Suzanne Ct., Panama City, Florida. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Bay County Jail (and Annex) facility, Panama City, Florida.
8. Plaintiff Janet L. Black currently resides at 1001 Huntington Drive, Panama City, Florida. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Bay County Jail Annex facility, Panama City, Florida.
9. Plaintiff Janet L. Toole currently resides at 5103 E. 12th Street, Panama City, Florida. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Bay County Jail and Annex facility, Panama City, Florida.
10. Plaintiff Tristan L. Gates currently resides at 6352 CR. 3175 East, Long Branch, Texas. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Bradshaw State Jail facility, Henderson, Texas.

11. Plaintiff Froylan Moya currently resides at 11174 Carrizo Drive, Laredo, Texas. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Webb County Detention Center facility, Laredo, Texas.
12. Plaintiff Delia C. Ramirez currently resides at 503 Rio Tamesis, Laredo, Texas. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Webb County Correction Center facility, Laredo, Texas.
13. Plaintiff Jessica C. Rice currently resides at 75 S. Sycamore Street, Florence, Arizona. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Red Rock Correction Center facility, Eloy, Arizona and Defendant's Florence Correction Center facility, Florence, Arizona.
14. Plaintiff John A. Conley currently resides at 351 N. Peart Rd. #1416, Casa Grande, Arizona. Plaintiff was employed as a corrections officer for the Defendant. Plaintiff worked at Defendant's Eloy Detention Center, Eloy, Arizona.
15. Plaintiff Kenneth E. Davis III currently resides in Arizona City, Arizona. Plaintiff is employed as a corrections officer for the Defendant. Plaintiff works at Defendant's Eloy Detention Center and Saguaro Correction Center, Eloy, Arizona.
16. Plaintiff Thomas L. Vinson currently resides in Arizona City, Arizona. Plaintiff is employed as a corrections officer for the Defendant. Plaintiff works at Defendant's Eloy Detention Center, Eloy, Arizona.
17. Plaintiff Lisa L. Mathey currently resides at 3465 W. Quail Dr., Tolter, Arizona. Plaintiff is employed as a corrections officer for the Defendant. Plaintiff works at Defendant's Eloy Detention Center, Eloy, Arizona.

18. Defendant CCA is a Maryland Corporation registered to do business and in good standing in the state of Kansas and operating a business at the Leavenworth Detention Center, 100 Highway Terrace, Leavenworth, Kansas. Defendant CCA employs corrections officers and other hourly non-exempt employees at sixty-five (65) facilities in nineteen states including the District of Columbia. Defendant's principle place of business is 10 Burton Hills Blvd., Nashville, Tennessee.

JURISDICTION AND VENUE

19. This Court has original federal question jurisdiction under 28 U.S.C. § 1311 for the claims brought under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201, *et seq.*
20. The United States District Court for the District of Kansas has personal jurisdiction because Defendant conducts business within this District.
21. Venue is proper in this Court pursuant to 28 U.S.C. §1391(b), inasmuch as the Defendant has offices, conducts business and can be found in the District of Kansas, and the cause of action set forth herein has arisen and occurred in part in the District of Kansas. Venue is also proper under 29 U.S.C. §1132(e)(2) because Defendant has substantial business contacts within the state of Kansas.

COUNT I – FLSA CLAIM
Corrections Officers

22. Plaintiff Keith Barnwell was employed by the Defendant from on or about January 17, 2007 through on or about June 15, 2007 at the Defendant's Leavenworth Detention Center, Leavenworth, Kansas. Plaintiff was employed as a corrections officer at this facility.
23. Plaintiff Feanja D. Smith has been employed by the Defendant from on or about September 21, 1992 through the present at Defendant's Leavenworth Detention Center

facility, 100 Highway Terrace, Leavenworth, Kansas. Within the past three years of this filing, Plaintiff has worked as a corrections officer at this facility.

24. Plaintiff James E. Smith has been employed by the Defendant from on or about June 26, 2000 through the present at Defendant's Leavenworth Detention Center facility, 100 Highway Terrace, Leavenworth, Kansas. Plaintiff is employed as a corrections officer at this facility.
25. Plaintiff Horacio Martinez is employed by the Defendant from on or about January 21, 2003 through the present at the Defendant's Bent County Correction Facility, Las Animas, Colorado. Plaintiff is employed as a corrections officer at this facility.
26. Plaintiff Scott Gregg was employed by the Defendant from on or about August 2003 through March 21, 2007 at the Defendant's Bay County Jail (and Annex), Panama City, Florida. Plaintiff was employed as a corrections officer at this facility.
27. Plaintiff Janet L. Black was employed by the Defendant from on or about September 27, 2004 through April 16, 2007 at Defendant's Bay County Jail Annex facility, Panama City, Florida. Plaintiff was employed as a corrections officer at this facility.
28. Plaintiff Janet L. Toole is employed by the Defendant from on or about August 22, 1996 through the present at Defendant's Bay County Jail and Annex facility, Panama City, Florida. Plaintiff is employed as a corrections officer at this facility.
29. Plaintiff Tristan L. Gates was employed by the Defendant from on or about July 11, 2005 through August 25, 2006 at Defendant's Bradshaw State Jail facility, Henderson, Texas. Plaintiff was employed as a corrections officer at this facility.

30. Plaintiff Froylan Moya is employed by the Defendant from on or about February 14, 2000 through the present at Defendant's Webb County Detention Center facility, Laredo, Texas. Plaintiff is employed as a corrections officer at this facility.
31. Plaintiff Delia C. Ramirez was employed by Defendant from on or about March 15, 2003 through November 22, 2005 at Defendant's Webb County Correction Center facility, Laredo, Texas. Plaintiff was employed as a corrections officer at this facility.
32. Plaintiff Jessica C. Rice was employed by the Defendant from on or about November 15, 1999 through on or about January 11, 2008 at Defendant's Red Rock Correction Center facility, Eloy, Arizona and Defendant's Florence Correction Center facility, Florence, Arizona. Within the past three years of this filing, the Plaintiff was employed as a corrections officer at these facilities.
33. Plaintiff John A. Conley is employed by the Defendant from February 22, 1999 through the present at Defendant's Eloy Detention Center, Eloy, Arizona. Within the past three years of this filing, the Plaintiff was employed as a corrections officer at this facility.
34. Plaintiff Kenneth E. Davis is employed by the Defendant from October 2006 to the present at Defendant's Eloy Detention Center and Saguaro Correction Center, Eloy, Arizona. Plaintiff is employed as a corrections officer at this facility.
35. Plaintiff Thomas L. Vinson is employed by the Defendant from January 26, 1998 through the present at Defendant's Eloy Detention Center, Eloy, Arizona. Plaintiff is employed as a corrections officer at this facility.
36. Plaintiff Lisa L. Mathey was employed by the Defendant from April 1996 through November 2006 at Defendant's Eloy Detention Center, Eloy, Arizona. Within three years of this filing, the Plaintiff was employed as a corrections officer at this facility.

37. Like the Plaintiffs, the Defendant employs corrections officers at its estimated sixty-five (65) corrections facilities located in nineteen (19) states and the District of Columbia. All such corrections officers are hereby referred to as the “putative representative action plaintiffs.”
38. Defendant compensates its corrections officers as non-exempt employees under the FLSA entitled to receive overtime. Defendant compensates its corrections officers by paying them an hourly wage based upon a forty hour work week.
39. All corrections officers working for Defendant are similarly situated in that they all perform essentially the same job functions.
40. All corrections officers are similarly situated in that they are all subject to the Defendant’s compensation policies and plan that requires corrections officers to perform work and/or requires them to be present at work while not compensating them for their services. In turn, this denies correction officers the compensation for services performed, and denies corrections officers their overtime compensation. This is in violation of the FLSA.
41. Plaintiffs bring this Complaint as a collective action pursuant to 29 U.S.C. §216(b) of the FLSA, on behalf of all persons who were, are, or will be employed by the Defendant as correction officers within three years from the commencement of this action who have not been compensated for services performed and/or compensated at one and one-half times the regular rate of pay for all services performed in excess of forty hours per week.
42. This Complaint may be brought and maintained as an “opt-in” collective action pursuant to 29 U.S.C. §216(b) of the FLSA for all claims asserted by the Representative Plaintiffs

43. The names and addresses of the putative representative action plaintiffs are available from Defendant. To the extent required by law, notice will be provided to said individuals via First Class Mail and/or by the use of techniques and a form of notice similar to those customarily used in representative actions.
44. At all relevant times, Defendant has been, and continues to be, an “employer” engaged in the interstate “commerce” and/or in the production of “goods” for “commerce” within the meaning of the FLSA, 29 U.S.C. §203. At all relevant times, Defendant has employed, and/or continues to employ, “employee[s],” including each of the putative representative action plaintiffs. At all times relevant herein, Defendant has had gross operating revenues in excess of \$500,000.00 (Five Hundred Thousand Dollars).
45. The FLSA requires each covered employer, such as Defendant, to compensate all non-exempt employees for services performed and to compensate them at a rate of not less than one and one-half the regular rate of pay for work performed in excess of forty hours in a work week.
46. The Plaintiffs and the putative representative action plaintiffs are not exempt from the right to receive overtime pay under the FLSA and are not exempt from the requirement that their employer pay them overtime compensation under the FLSA. The Plaintiffs and the putative representative action plaintiffs are entitled to be paid overtime compensation for all overtime hours worked.
47. At all relevant times, Defendant had a policy and practice of failing and refusing to pay correction officers for services performed and/or to pay to its correction officer

employees at a rate of not less than one and one-half the regular rate of pay for work performed in excess of forty hours in a work week.

48. The Defendant failed to compensate Plaintiffs and the putative representative action plaintiffs at a rate of not less than one and one-half times the regular rate of pay for work performed in excess of forty hours in a work week, and therefore, Defendant has violated, and continues to violate, the FLSA, 29 U.S.C. §§201, *et seq.*, including 29 U.S.C. §207(a)(1).
49. The foregoing conduct, as alleged herein, constitutes a willful violation of the FLSA within the meaning of 29 U.S.C. §255(a).
50. The Plaintiffs, on behalf of themselves and all similarly situated employees of Defendant who compose the putative representative action plaintiffs, seek damages in the amount of all respective unpaid compensation and overtime compensations at a rate of one and one-half times the regular rate of pay for work performed in excess of forty hours in a work week, plus liquidated damages, as provided by the FLSA, 29 U.S.C. §216(b), and such other legal and equitable relief as the Court deems just and proper.
51. The Plaintiffs, on behalf of themselves and all similarly situated employees of Defendant who compose putative representative action plaintiffs, seek recovery of all attorneys' fees, costs, and expenses of this action, to be paid by Defendant, as provided by the FLSA, 29 U.S.C. §216(b).

WHEREFORE, Plaintiffs, on behalf of themselves and all proposed putative representative action plaintiffs, pray for relief as follows:

- a. Designation of this action as a collective action on behalf of the proposed putative representative action plaintiffs and prompt issuance of notice pursuant to 29 U.S.C.

- §216(b) to all putative representative action plaintiffs (the FLSA opt-in class), apprising them of the pendency of this action and permitting them to assert timely FLSA claims in this action by filing individual Consents To Join pursuant to U.S.C. §216(b);
- b. Designation of Plaintiffs Keith E. Barnwell, Feanja D. Smith, Edward E. Smith, Delia C. Ramirez, Froylan Moya, Tristan L. Gates, Horacio Martinez, Scott Greg, Janet L. Black, Janet Toole, Jessica C. Rice, John A. Conley, Kenneth E. Davis, Thomas L. Vinson, and Lisa L. Mathey as Representative Plaintiffs of the putative representative action plaintiffs of corrections officers;
 - c. A declaratory judgment that the practices complained of herein are unlawful under the FLSA, 29 U.S.C. §201, *et seq.*;
 - d. An injunction against Defendant and their officers, agents, successors, employees, representatives, and any and all persons acting in concert with Defendant, as provided by law, from engaging in each of the unlawful practices, policies, and patterns set forth herein;
 - e. An award of damages for overtime compensation due for the Plaintiffs and the putative representative action plaintiffs, including liquidated damages, to be paid by Defendant;
 - f. Costs and expenses of this action incurred herein, including reasonable attorneys' fees and expert fees;
 - g. Pre-Judgment and Post-Judgment interest, as provided by law; and
 - h. Any and all such other and further legal and equitable relief as this Court deems necessary, just and proper.

COUNT II – FLSA CLAIM
Other Non-Exempt Hourly Employees

52. Plaintiff Jessica C. Rice was employed by the Defendant from on or about November 15, 1999 through on or about January 11, 2008 at Defendant's Red Rock Correction Center facility, Eloy, Arizona and Defendant's Florence Correction Center facility, Florence, Arizona. Within the past three years of this filing, the Plaintiff was employed as a non-exempt hourly corrections counselor at these facilities.
53. Plaintiff John A. Conley is employed by the Defendant from February 22, 1999 through the present at Defendant's Eloy Detention Center, Eloy, Arizona. Within the past three years of this filing, the Plaintiff was employed as a non-exempt hourly corrections counselor at this facility.
54. Plaintiff Feanja D. Smith has been employed by the Defendant from on or about September 21, 1992 through the present at Defendant's Leavenworth Detention Center facility, 100 Highway Terrace, Leavenworth, Kansas. Within the past three years of this filing, Plaintiff has worked as a non-exempt hourly corrections counselor and case manager at this facility.
55. Plaintiff Lisa L. Mathey was employed by the Defendant from April 1996 through November 2006 at Defendant's Eloy Detention Center, Eloy, Arizona. Within three years of this filing, the Plaintiff was employed as a non-exempt hourly case manager at this facility.
56. In addition to the positions of the named Plaintiffs under this Count, the Defendant employs other non-exempt hourly employees at its estimated sixty-five (65) corrections facilities located in nineteen (19) states and the District of Columbia. All such non-exempt hourly employees are hereby referred to as the putative representative action plaintiffs.

57. Defendant compensates all such hourly persons as non-exempt employees under the FLSA entitled to receive overtime. Defendant compensates non-exempt hourly employees by paying them an hourly wage based upon a forty hour work week.
58. All non-exempt hourly employees are similarly situated in that they are all subject to the Defendant's compensation policies and plan that requires them to perform work and/or requires them to be present at work while not compensating them for their services. In turn, this denies non-exempt hourly employees the compensation for services performed, and denies non-exempt hourly employees their overtime compensation. This is in violation of the FLSA.
59. Plaintiffs bring this Complaint as a collective action pursuant to 29 U.S.C. §216(b) of the FLSA, on behalf of all persons who were, are, or will be employed by the Defendant as non-exempt hourly employees within three years from the commencement of this action who have not been compensated for services performed and/or compensated at one and one-half times the regular rate of pay for all services performed in excess of forty hours per week.
60. This Complaint may be brought and maintained as an "opt-in" collective action pursuant to 29 U.S.C. §216(b) of the FLSA for all claims asserted by the Representative Plaintiffs because their claims are similar to the claims of the putative representative action plaintiffs.
61. The names and addresses of the putative representative action plaintiffs are available from Defendant. To the extent required by law, notice will be provided to said individuals via First Class Mail and/or by the use of techniques and a form of notice similar to those customarily used in representative actions.

62. At all relevant times, Defendant has been, and continues to be, an “employer” engaged in the interstate “commerce” and/or in the production of “goods” for “commerce” within the meaning of the FLSA, 29 U.S.C. §203. At all relevant times, Defendant has employed, and/or continues to employ, “employee[s],” including each of the putative representative action plaintiffs. At all times relevant herein, Defendant has had gross operating revenues in excess of \$500,000.00 (Five Hundred Thousand Dollars).
63. The FLSA requires each covered employer, such as Defendant, to compensate all non-exempt hourly employees for services performed and to compensate them at a rate of not less than one and one-half the regular rate of pay for work performed in excess of forty hours in a work week.
64. The Plaintiffs and the putative representative action plaintiffs are not exempt from the right to receive overtime pay under the FLSA and are not exempt from the requirement that their employer pay them overtime compensation under the FLSA. The Plaintiffs and the putative representative action plaintiffs are entitled to be paid overtime compensation for all overtime hours worked.
65. At all relevant times, Defendant had a policy and practice of failing and refusing to pay non-exempt hourly employees for services performed and/or to pay to its non-exempt hourly employees at a rate of not less than one and one-half the regular rate of pay for work performed in excess of forty hours in a work week.
66. The Defendant failed to compensate Plaintiffs and the putative representative action plaintiffs at a rate of not less than one and one-half times the regular rate of pay for work performed in excess of forty hours in a work week, and therefore, Defendant has violated,

and continues to violate, the FLSA, 29 U.S.C. §§201, *et seq.*, including 29 U.S.C. §207(a)(1).

67. The foregoing conduct, as alleged herein, constitutes a willful violation of the FLSA within the meaning of 29 U.S.C. §255(a).
68. The Plaintiffs, on behalf of themselves and all similarly situated employees of Defendant who compose the putative representative action plaintiffs, seek damages in the amount of all respective unpaid compensation and overtime compensations at a rate of one and one-half times the regular rate of pay for work performed in excess of forty hours in a work week, plus liquidated damages, as provided by the FLSA, 29 U.S.C. §216(b), and such other legal and equitable relief as the Court deems just and proper.
69. The Plaintiffs, on behalf of themselves and all similarly situated employees of Defendant who compose putative representative action plaintiffs, seek recovery of all attorneys' fees, costs, and expenses of this action, to be paid by Defendant, as provided by the FLSA, 29 U.S.C. §216(b).

WHEREFORE, Plaintiffs, on behalf of themselves and all proposed putative representative action plaintiffs, pray for relief as follows:

- a. Designation of this action as a collective action on behalf of the proposed putative representative action plaintiffs and prompt issuance of notice pursuant to 29 U.S.C. §216(b) to all putative representative action plaintiffs (the FLSA opt-in class), apprising them of the pendency of this action and permitting them to assert timely FLSA claims in this action by filing individual Consents To Join pursuant to U.S.C. §216(b);

- b. Designation of Plaintiffs Jessica C. Rice, John A. Conley, and Feanja D. Smith as Representative Plaintiffs of the putative representative action plaintiffs of non-exempt hourly employees;
- c. A declaratory judgment that the practices complained of herein are unlawful under the FLSA, 29 U.S.C. §201, *et seq.*;
- d. An injunction against Defendant and their officers, agents, successors, employees, representatives, and any and all persons acting in concert with Defendant, as provided by law, from engaging in each of the unlawful practices, policies, and patterns set forth herein;
- e. An award of damages for overtime compensation due for the Plaintiffs and the putative representative action plaintiffs, including liquidated damages, to be paid by Defendant;
- f. Costs and expenses of this action incurred herein, including reasonable attorneys' fees and expert fees;
- g. Pre-Judgment and Post-Judgment interest, as provided by law; and
- h. Any and all such other and further legal and equitable relief as this Court deems necessary, just and proper.

Demand for Jury Trial

Plaintiffs hereby demand a jury trial on all causes of action and claims with respect to which they and all members of the proposed representative action have a right to jury trial.

Designated Place of Trial

COMES NOW the Plaintiffs by and through their counsel of record and hereby designate the place of trial as follows: **Kansas City, Kansas.**

Respectfully submitted,



/s/ Brendan J. Donelon

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