

COMJD

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CASE NO: A-21-844119-C
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Attorneys for Plaintiff

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

CARITA ROVERE, on behalf of herself
and all others similarly situated;

Plaintiff,

vs.

LOLA'S, LLC d/b/a and a/k/a LOLA'S
SUMMERLIN; DOES 1 through 50,
inclusive,

Defendant.

Case No.
Dept.:

CLASS ACTION COMPLAINT

**Arbitration Exemption Claimed:
Class Action**

- 1) Failure to Pay Minimum Wages in Violation of the Nevada Constitution;
- 2) Failure to Pay Overtime in Violation of NRS 608.018 and 608.140;
- 3) Failure to Timely Pay All Wages Due and Owing in Violation of NRS 608.020-050 and 608.140;
- 4) Tortious Discharge; and,
- 5) Injunctive Relief.

**LIEN REQUESTED PURSUANT TO
NRS 608.050**

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT

COMES NOW Plaintiff Carita Rovere on behalf of herself and all others similarly situated and alleges the following:

All allegations in the Complaint are based upon information and belief except for those allegations that pertain to the Plaintiff named herein and her counsel. Each allegation in the Complaint either has evidentiary support or is likely to have evidentiary support after a reasonable opportunity for further investigation and discovery.

JURISDICTION AND VENUE

1. This Court has original jurisdiction over the state law claims alleged herein because the amount in controversy exceeds \$15,000 and a party seeking to recover unpaid wages has a private right of action pursuant to the Nevada Constitution, Article 15 Section 16, and Nevada Revised Statute ("NRS") Chapter 608. See *Neville v. Eighth Judicial Dist. Court in & for Cty. of Clark*, 406 P.3d 499 (Nev. 2017).

2. Plaintiff also claims a private cause of action to foreclose a lien against the property owner for wages due pursuant to NRS 608.050.

3. Venue is proper in this Court because the Defendant named herein maintains a principal place of business or otherwise is found in this judicial district and many of the acts complained of herein occurred in Clark County, Nevada.

PARTIES

4. Plaintiff Carita Rovere ("Plaintiff") is a resident of the State of Nevada and was employed by Defendant as a non-exempt hourly employee from in or about November of 2019 to in or about May of 2021.

5. Defendant Lola's, LLC d/b/a and a/k/a Lola's Summerlin ("Defendant") is a domestic limited-liability company registered with the Nevada Secretary of State.

6. Defendant was doing business in this Judicial District in Clark County, Nevada where the subject incidences occurred.

7. At all relevant times, each Defendant was an agent, employee, joint-venturer, shareholder, director, member, co-conspirator, alter ego, master, or partner of

each of the other Defendants, and at all times mentioned herein were acting within the scope and course and in pursuance of his, her, or its agency, joint venture, partnership, employment, common enterprise, or actual or apparent authority in concert with each other and the other Defendants.

8. At all relevant times, the acts and omissions of Defendants concurred and contributed to the various acts and omissions of each and every one of the other Defendants in proximately causing the complaints, injuries, and damages alleged herein. At all relevant times herein, Defendants approved of, condoned and/or otherwise ratified each and every one of the acts or omissions complained of herein. At all relevant times herein, Defendants aided and abetted the acts and omissions of each and every one of the other Defendants thereby proximately causing the damages as herein alleged.

9. The Defendants named herein are the employers of the Plaintiff and all Class Members alleged herein. The Defendants are employers engaged in commerce under the provisions of NRS 608.011. The identity of DOES 1-50 is unknown at the time and the Complaint will be amended at such time when the identities are known to Plaintiff. Plaintiff is informed and believes that each Defendants sued herein as DOE is responsible in some manner for the acts, omissions, or representations alleged herein and any reference to "Defendant" or "Defendants" herein shall mean "Defendants and each of them."

FACTUAL ALLEGATIONS

The Named-Plaintiff

10. Plaintiff was employed by Defendant as a non-exempt hourly employee from in or about November of 2019 to in or about May of 2021.

11. Plaintiff had been classified as an hourly non-exempt employee of Defendant with an hourly rate of pay of \$8.55.

12. Plaintiff was regularly scheduled for and regularly worked at least 8 hours per workday.

Defendant's Policy of Failing to Offer or Provide Health Insurance Benefits Less Than 10% of Employees' Total Gross Income

13. Defendant maintains an unlawful payment practice of paying Plaintiff and all other similarly situated employees less than the higher-tier minimum rate even though Defendant does not offer or provide insurance that is less than 10% of the total gross income of Plaintiff and other similarly situated employees.

14. Indeed, upon information and belief, Defendant only offers health insurance to "full time employees." See a true and correct copy of the April 27, 2021 text message attached hereto as Exhibit I.

15. For instance, on the pay period beginning June 29, 2020 (a true and correct copy of Plaintiff's earnings statement is attached hereto as Exhibit II, with the wages for the aforementioned pay period being issued on July 14, 2020), Defendant paid Plaintiff a total gross taxable income of \$386.89 in minimum wages for 45.25 hours worked.

16. Tips are not included in the calculation of an employee's total gross taxable income. See *MDC Restaurants, LLC et al v. The Eighth Judicial Dist. Court*, 132 Nev. Op. 76 (Oct. 27, 2016).

17. During that same period of time (and indeed during her entire employment), Plaintiff was not offered nor provided with health benefits of less than the 10% maximum percentage for an employer to qualify for the lower-tier minimum wage payment.

18. During such June 29, 2020 through July 12, 2020 pay period and specifically on July 1, 2020, Nevada's two-tier minimum wage increased from \$7.25 an hour to \$8.00 an hour for employees offered qualifying health benefits and from \$8.25 an hour to \$9.00 an hour for employees not offered qualifying health benefits.

19. During such pay period (and indeed during her entire employment), Defendant failed to compensate Plaintiff at the then-correct legal higher-tier minimum

1 wage rate of \$8.25 (prior to July 1, 2020) or \$9.00 (following July 1, 2020) per non-
2 overtime hour worked.

3 20. Similarly, on the pay period beginning June 1, 20020 (a true and correct
4 copy of Plaintiff's earnings statement is attached hereto as Exhibit III, with the wages for
5 the aforementioned pay period being issued on June 16, 2020), Defendant paid Plaintiff
6 a total gross taxable income of \$274.54 in minimum wages for 32.11 regular hours
7 worked. During that same period of time, Plaintiff was not offered or provided with
8 health benefits of less than the 10% maximum percentage for an employer to qualify for
9 the lower-tier minimum wage payment. Accordingly, Defendant failed to compensate
10 Plaintiff at the correct legal higher-tier minimum wage rate of \$8.25 per non-overtime
11 hour worked.

12 21. The policies and practices of Defendant at all relevant times have been
13 substantially similar, if not identical, for all employees at all Defendant's locations.
14 Defendant also purportedly paid less than the higher-tier minimum wage rate to putative
15 class members even though it did not offer health insurance to employees at a cost of
16 10% or less than their gross earnings

17 22. Defendant is legally required to maintain all itemized pay statements that
18 will demonstrate the amount of health insurance premiums offered to Plaintiff and all
19 putative class member and the resulting amount of wages underpaid to Plaintiff and all
20 members of the putative class during the entire period of time at issue in this case.

21 **Defendant's Policy of Failing to "Shift Jamming" and Not Paying Daily Overtime**

22 23. Defendant maintains an unlawful policy of not paying daily overtime to
23 non-exempt hourly employees who earn 1 ½ times less than the applicable minimum
24 wage.

25 24. Plaintiff has frequently worked over 8 hours in any 24-hour workday.

26 25. On many occasions, Plaintiff has worked a shift in the late afternoon and
27 evening hours and then returned the next day at an earlier start time than the previous
28

day's shift. The number of hours she worked in a workday under Nevada law was over 8 hours in a 24-hour period of time.

26. For instance, during the workweek of June 29, 2020, Defendant scheduled Plaintiff to work and Plaintiff did work over 8 hours in a 24-hour period of time. See a true and correct copy of Plaintiff's punch records attached hereto as Exhibit IV.

27. But despite having worked more than 8 hours in a 24-hour period of time, Defendant failed to compensate Plaintiff at 1 ½ times her regular rate of pay for the overtime hours he worked. See a true and correct copy of Plaintiff's July 14, 2020 earnings statement attached hereto as Exhibit II.

28. Upon information and belief, Defendant maintains a company-wide policy and practice of refusing to pay daily overtime wages to Nevada employees who worked over 8 hours in a workday.

29. This "no daily overtime" policy has always been common to all non-exempt hourly paid employees at Defendant's locations in the state of Nevada.

Class Allegations

30. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.

31. Plaintiff brings this action on behalf of herself and all others similarly situated employees as a class action under Rule 23 of the Nevada Rules of Civil Procedure.

32. The **Classes** are defined as follows:

A. **Minimum Wage Class:** "All hourly paid non-exempt persons employed by Defendant who were paid less than the applicable minimum wage per non-overtime hour worked in the state of Nevada within 2 years from the filing of this complaint until judgment."

B. **Overtime Class:** "All hourly paid non-exempt persons employed by Defendant who were paid less than 1 ½ times the applicable minimum wage per overtime hour worked in the state of Nevada within 3 years from the filing of this complaint until judgment."

C. **Waiting Time Wages Class:** "All members of the Minimum Wage and/or Overtime Classes who are former employees."

1 33. Class treatment is appropriate under Rule 23's class certification
2 mechanism because:

3 A. The Classes are Sufficiently Numerous: Upon information and
4 belief, Defendant employs, and has employed, in excess of 40 Minimum Wage,
5 Overtime, and Waiting Time Wages Class Members within the applicable time period.
6 Because Defendant is legally obligated to keep accurate payroll records, Plaintiff
7 alleges that Defendant's records will establish the members of these Classes as well as
8 their numerosity.

9 B. Plaintiff's Claims is Typical to Those of Fellow Class Members:
10 Each Class Member is and was subject to the same practices, plans, or policies as
11 Plaintiff: (1) Whether Defendant can meet its burden of demonstrating that Plaintiff and
12 Minimum Wage Class Members were only entitled to receive less than the higher-tier
13 minimum wage rate; (2) Whether Defendant can meet its burden of demonstrating that
14 Plaintiff and Overtime Class Members were paid the appropriate overtime wage rate for
15 all overtime hours worked; (3) Whether Plaintiff and members of the Waiting Time
16 Wages Class are entitled to waiting time wages for the failure to pay them minimum,
17 regular, and overtime wages owed.

18 C. Common Questions of Law and Fact Exist: Common questions of
19 and fact exist and predominate as to Plaintiff and the Class Members, including, without
20 limitation: Whether Defendant offered health insurance to Plaintiff and Class Members
21 that was no more than 10% of employees' gross taxable income and whether
22 Defendant failed to pay the Waiting Time Wages Class Members all their wages due
23 and owing in violation of NRS 608.020-050.

24 D. Plaintiff is Adequate Representative of the Class: Plaintiff will fairly
25 and adequately represent the interests of the Class because Plaintiff is a member of all
26 the Classes, she has issues of law and fact in common with all members of the
27 Classes, and her interests are not antagonistic to Class members. Plaintiff and her
28 counsel are aware of their fiduciary responsibilities to Class Members and are

1 determined to discharge those duties diligently by vigorously seeking the maximum
2 possible recovery for Class Members.

3 E. Predominance/Superior Mechanism: Class claims predominate and
4 a class action is superior to other available means for the fair and efficient adjudication
5 of this controversy. Each Class Member has been damaged and is entitled to recovery
6 by reason of Defendant's illegal policy and/or practice of failing to compensate its
7 employees in accordance with Nevada wage and hour law. The prosecution of
8 individual remedies by each Class Member will tend to establish inconsistent standards
9 of conduct for Defendant and result in the impairment of Class Members' rights and the
10 disposition of their interest through actions to which they were not parties.

11 **FIRST CAUSE OF ACTION**

12 **Failure to Pay Minimum Wages in Violation of the Nevada Constitution
(On Behalf of Plaintiff and the Minimum Wage Class Against Defendant)**

13 34. Plaintiff realleges and incorporates by this reference all the paragraphs
14 above in this Complaint as though fully set forth herein.

15 35. Article 15 Section 16 of the Nevada Constitution sets forth the
16 requirements the minimum wage requirements in the State of Nevada ("MWA"). The
17 MWA sets forth a two-tiered minimum wage, which were set at \$7.25 and \$8.25 prior to
18 July 1, 2020 and then increased to \$8.00 and \$9.00 following July 1, 2020.

19 36. On July 1, 2021, Nevada's two-tiered minimum wage again increased, this
20 time to \$8.75 and \$9.75.

21 37. In order to pay the lower-tier minimum wage amount, an employer must
22 offer health benefits to its employees and the dependents of the employees "at a total
23 cost to the employee for premiums of not more than 10 percent of the employee's gross
24 taxable income from the employer."

25 38. As alleged herein, Defendant paid Plaintiff and all other members of the
26 Class less than the applicable higher-tier minimum wage rate but failed to offer
27 qualifying health benefits to its employees and the employees' dependents at a total
28

1 cost to the employee for premiums of not more than 10% of the employees' gross
2 taxable income.

3 39. By unlawfully paying Plaintiff and members of the Class less than the
4 then-applicable higher-tier minimum wage rate, Defendant has failed to compensate
5 Plaintiff and members of the Class at the minimum wage rate for all the hours that they
6 worked pursuant to the Nevada Constitution.

7 40. Wherefore, Plaintiff demands for herself and for all other Class Members
8 that Defendant pay Plaintiff and Class Members their unpaid minimum wages for all
9 hours worked during the relevant time period alleged herein together with attorneys'
10 fees, costs, interest, and punitive damages, as provided by law.

11 **SECOND CAUSE OF ACTION**

12 **Failure to Pay Overtime Wages in Violation of NRS 608.018 and 608.140**
13 **(On Behalf of Plaintiff and the Overtime Class Against Defendant)**

14 41. Plaintiff realleges and incorporates by this reference all the paragraphs
15 above in this Complaint as though fully set forth herein.

16 42. NRS 608.140 provides that an employee has a private right of action for
17 unpaid wages.

18 43. NRS 608.018(1) provides as follows:

19 An employer shall pay 1 1/2 times an employee's regular
20 wage rate whenever an employee who receives
21 compensation for employment at a rate less than 1 1/2 times
22 the minimum rate prescribed pursuant to NRS 608.250
works: (a) More than 40 hours in any scheduled week of
work; or (b) More than 8 hours in any workday unless by
mutual agreement the employee works a scheduled 10 hours
per day for 4 calendar days within any scheduled week of
work.

23 44. NRS 608.018(2) provides as follows:

24 An employer shall pay 1 1/2 times an employee's regular
25 wage rate whenever an employee who receives
26 compensation for employment at a rate not less than 1 1/2
times the minimum rate prescribed pursuant to NRS 608.250
works more than 40 hours in any scheduled week of work.

27 45. As alleged herein, Defendant maintains a policy and/or practice of illegal
28 shift jamming (i.e., refusing to pay daily overtime when Plaintiff and members of the

1 Nevada Overtime Class worked over 8 hours in a workday). As a result, Plaintiff and
2 Nevada Overtime Class Members have been denied overtime compensation according
3 to Nevada law.

4 46. Wherefore, Plaintiff demands for himself and all Nevada Overtime Class
5 Members that Defendant pays Plaintiff and Nevada Overtime Class Members one and
6 one-half times their "regular rate" of pay for all hours worked in excess of eight (8) hours
7 in a workday during the relevant time period together with attorneys' fees, costs, and
8 interest as provided by law.

9 **THIRD CAUSE OF ACTION**

10 **Waiting Time Wages Pursuant to NRS 608.020-.050 and 608.140**
11 **(On Behalf of Plaintiff and the Waiting Time Wages Class Against Defendant)**

12 47. Plaintiff realleges and incorporates by this reference all the paragraphs
13 above in this Complaint as though fully set forth herein.

14 48. NRS 608.140 provides that an employee has a private right of action for
15 unpaid wages.

16 49. NRS 608.020 provides that "[w]henver an employer discharges an
17 employee, the wages and compensation earned and unpaid at the time of such
18 discharge shall become due and payable immediately."

19 50. NRS 608.040(1)(a-b), in relevant part, imposes a penalty on an employer
20 who fails to pay a discharged or quitting employee: "Within 3 days after the wages or
21 compensation of a discharged employee becomes due; or on the day the wages or
22 compensation is due to an employee who resigns or quits, the wages or compensation
23 of the employee continues at the same rate from the day the employee resigned, quit,
24 or was discharged until paid for 30-days, whichever is less."

25 51. NRS 608.050 grants an "employee lien" to each discharged or laid-off
26 employee for the purpose of collecting the wages or compensation owed to them "in the
27 sum agreed upon in the contract of employment for each day the employer is in default,
28 until the employee is paid in full, without rendering any service therefore; but the
employee shall cease to draw such wages or salary 30 days after such default."

53. Defendant willfully refuses and continues to refuse to pay Plaintiff and Waiting Time Wages Class Members all the wages that were due and owing upon the termination of their employment.

54. Wherefore, Plaintiff and the Waiting Time Wages Class Members demand thirty (30) days of pay as waiting wages under NRS 608.040 and 608.140, and thirty (30) days of pay as waiting wages under NRS 608.050 and 608.140, together with attorneys' fees, costs, and interest, as provided by law.

FOURTH CAUSE OF ACTION
Tortious Discharge
(On Behalf of Plaintiff Individually Against Defendant)

55. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.

56. Defendant terminated Plaintiff for reasons which violate public policy including, but not limited to, Nevada's public policy against terminating an employee for discussing her wages and Nevada's public policy against terminating an employee for engaging in protected activities.

57. Specifically, and upon information and belief, Defendant terminated Plaintiff for discussing how she believed Defendant was “violating minimum wage law.”

58. As a proximate result of Defendant's tortious discharge of Plaintiff, Defendant has suffered general, special, and consequential damages in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

59. The acts and/or omissions of Defendant was fraudulent, malicious, or oppressive under NRS § 42.005.

60. Pursuant to NRS § 42.005, Plaintiff is entitled to an award of punitive damages in excess of Fifteen Thousand Dollars (\$15,000.00).

61. It was necessary for Plaintiff to retain the services of an attorney to file this action, which entitles Plaintiff to an award of reasonable attorney's fees and costs in this suit.

FIFTH CAUSE OF ACTION
Injunctive/Declaratory Relief
(On Behalf of Plaintiff, Minimum Wage Class, and the Overtime Class Against Defendant)

62. Plaintiff realleges and incorporates by this reference all the paragraphs above in this Complaint as though fully set forth herein.

63. As Defendant has paid Plaintiff and all other members of the Minimum Wage Class less than the higher-tier minimum wage rate but failed to offer health benefits to its employees and the employees' dependents at a total cost to the employee for premiums of not more than 10% of the employees' gross taxable income, Defendant has wrongfully withheld wages properly-owed to the Plaintiff and the Minimum Wage Class Members.

64. As Defendant has likewise failed to compensate Plaintiff and members of the Overtime Class at the correct overtime wage rate for all the overtime hours that they worked pursuant to NRS 608.018, Defendant has wrongfully withheld wages properly-owed to the Plaintiff and the Overtime Class Members.

65. Plaintiff, the Minimum Wage Class, and the Overtime Class will suffer irreparable injury if Defendant is not enjoined from the future wrongful retention of wages owed.

66. As a result of the aforementioned unlawful payment practices, Plaintiff submits that there has been a likelihood of success on the merits that Plaintiff and the Class Members have been damaged and that there is irreparable harm.

67. Plaintiff requests that this Honorable Court enter an Order that restrains Defendant from attempting to enforce the alleged unlawful payment practices.

68. Plaintiff requests that this Honorable Court enter a declaration of rights/obligations in regards to all such unlawful payment practices in this matter.

69. Further, disputes and controversies have arisen between the parties relative to the lawfulness of the payment practices, and Plaintiff is entitled to have an order entered pursuant to Chapter 30 of the Nevada Revised Statutes construing the payment practices and adjudging and declaring Plaintiff and the Class Members' rights and remedies thereunder including such an Order stating that such payment practices are unlawful.

70. Plaintiff has been required to retain the services of an attorney and is entitled to a reasonable award of attorneys' fees and costs.

PRAYER FOR RELIEF

Wherefore Plaintiff, by herself and on behalf of Class Members, prays for relief as follows relating to her class action allegations:

1. For an order certifying this action as a class action on behalf the proposed Classes and providing notice to all Class Members so they may participate in this lawsuit;
2. For an order appointing Plaintiff as the Representative of the Classes and her counsel as Class Counsel;
3. For damages according to proof for minimum rate pay under the Nevada Constitution for all hours worked;
4. For damages according to proof for overtime compensation under NRS 608.018 and 608.140 for all hours worked over 8 hours per day and/or over 40 hours in a workweek;
5. For waiting time wages pursuant to NRS 608.040-.050 and 608.140;
6. For a lien on the property where Plaintiff and all Nevada Class Members labored pursuant to NRS 608.050;
7. For injunctive relief;
8. For declaratory relief;
9. For interest as provided by law at the maximum legal rate;
10. For punitive damages;

11. For reasonable attorneys' fees authorized by statute;
12. For costs of suit incurred herein;
13. For pre-judgment and post-judgment interest, as provided by law; and,
14. For such other and further relief as the Court may deem just and proper.

DATED: November 15, 2021 GABROY LAW OFFICES

By: /s/ Christian Gabroy

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Attorneys for Plaintiff

EXHIBIT I

3:04



12 People >

Text Message
Tue, Apr 27, 5:41 PM

Christy Lolas GM

Lola's offers insurance to full time employees and open enrollment is this month. If interested see me or Miss Lola

CG



Text Message



Apple Pay



EXHIBIT II

Company Code RQ/77U 21683061 Loc/Dept 01/5 Number 7823375 Page 1 of 1
Lolas LLC
5680 COE Estates CT
Las Vegas, NV 89149

Earnings Statement



Period Starting: 06/29/2020
Period Ending: 07/12/2020
Pay Date: 07/14/2020

Taxable Marital Status: Single
Exemptions/Allowances: Tax Override:
Federal: 2 Federal:
State: 0 State:
Local: 0 Local:
Social Security Number: XXX-XX-XXXX

Carita E Rovere



Earnings	rate	hours/units	this period	year to date
Regular	8.5500	45.25	386.89	3887.80
Overtime			0.00	54.12
Credit card tips paid		0.00	775.40	7852.49

Gross Pay			\$1,162.29	\$11,794.41
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Statutory Deductions	this period	year to date
Federal Income	-74.65	753.29
Social Security	-72.06	731.25
Medicare	-16.85	171.02

Voluntary Deductions	this period	year to date
Child support 1	-111.23	1076.78
Creditor 1	-2.00	18.00
Employer processing fee	-3.00	27.00

Net Pay	\$107.10
----------------	-----------------

Other Benefits and Information	this period	year to date
Total Hours Worked	45.25	458.30

Deposits account number	transit/ABA	amount
XXXXXX5457	XXXXXXXXXX	107.10

Your federal taxable wages this period are \$1,162.29

Lolas LLC
5680 COE Estates CT
Las Vegas, NV 89149

Pay Date: 07/14/2020

Deposited to the account	account number	transit/ABA	amount
Checking DirectDeposit		XXXXXXXXXX	107.10

THIS IS NOT A CHECK

Carita E Rovere



EXHIBIT III

Company Code RQ/77U 21683061 Loc/Dept 01/5 Number 7747185 Page 1 of 1
Lolas LLC
5680 COE Estates CT
Las Vegas, NV 89149

Earnings Statement



Period Starting: 06/01/2020
Period Ending: 06/14/2020
Pay Date: 06/16/2020

Taxable Marital Status: Single
Exemptions/Allowances: Tax Override:
Federal: 2 Federal:
State: 0 State:
Local: 0 Local:
Social Security Number: XXX-XX-XXXX

Carita E Rovere



Earnings	rate	hours/units	this period	year to date
Regular	8.5500	32.11	274.54	3073.32
Overtime			0.00	54.12
Credit card tips paid		0.00	570.69	6466.21

Gross Pay			\$845.23	\$9,593.65
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Statutory Deductions	this period	year to date
Federal Income	-36.83	618.85
Social Security	-52.41	594.81
Medicare	-12.26	139.11

Voluntary Deductions	this period	year to date
Child support 1	-111.23	854.32
Creditor 1	-2.00	14.00
Employer processing fee	-3.00	21.00

Net Pay	\$56.81
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Other Benefits and Information	this period	year to date
Total Hours Worked	32.11	363.04

Deposits account number	transit/ABA	amount
	XXXXXXXXXX	56.81

Your federal taxable wages this period are \$845.23

Lolas LLC
5680 COE Estates CT
Las Vegas, NV 89149

Pay Date: 06/16/2020

Deposited to the account	account number	transit/ABA	amount
Checking DirectDeposit		XXXXXXXXXX	56.81

THIS IS NOT A CHECK

Carita E Rovere

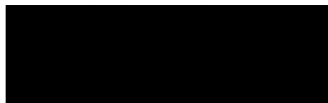


EXHIBIT IV

== Cash Amount Due ==

LA'S
n Center Drive
s, NV. 89144
871-5652

LOLA'S
1220 N Town Center Drive
Las Vegas, NV. 89144
(702) 871-5652

Wednesday, July 8, 2020 04:26 PM

Empl: Carita
Station: 1

Clocked In: 07/08/2020 10:16:43 AM
Clocked Out: 07/08/2020 04:26:47 PM

Total Time 6 Hours 10 Min

Tuesday, July 7, 2020 09:27 PM

Empl: Carita
Station: 4

Clocked In: 07/07/2020 05:02:21 PM
Clocked Out: 07/07/2020 09:27:08 PM

Total Time 4 Hours 24 Min