		Electronically Filed 1/18/2022 8:51 AM Steven D. Grierson CLERK OF THE COURT
1	<b>COMJD</b> Christian Gabroy, Nev. Bar No. 8805	Atum S. Summe
2	Kaine Messer, Nev. Bar No. 14240 GABROY   MESSER	
3	The District at Green Valley Ranch 170 S. Green Valley Pkwy, Suite 280	CASE NO: A-22-846801-C
4 5	Henderson, Nevada 89012 Tel. (702) 259-7777 Fax. (702) 259-7704	Department 20
6	christian@gabroy.com kmesser@gabroy.com	
7	Mark R. Thierman, Nev. Bar No. 8285	
8	Joshua D. Buck, Nev. Bar No. 12187 Leah L. Jones, Nev. Bar No. 13161	
9	THIERMAN BUCK LLP 7287 Lakeside Drive	
10	Reno, Nevada 89511 Tel. (775) 284-1500	
11	Fax. (775) 703-5027 mark@thiermanbuck.com	
12	josh@thiermanbuck.com leah@thiermanbuck.com <i>Attorneys for Plaintiff</i>	
13		
14		NTY, NEVADA
15	BETHANNE BOSCHINI, on behalf of	Case No.:
16	herself and all others similarly situated,	Dept. No.:
17	Plaintiff,	CLASS ACTION COMPLAINT
18	VS.	Arbitration Exemption Claimed: Class Action
19	HALLMARK RETAIL, LLC; DOES 1 through 50; inclusive,	1) Failure to Pay Overtime in Violation of
20	Defendant(s).	NRS 608.018 and 608.140;
21		<ol><li>Failure to Timely Pay All Wages Due and Owing in Violation of NRS</li></ol>
22		608.020-050 and 608.140; and,
23 24		3) Injunctive Relief.
24 25		LIEN REQUESTED PURSUANT TO NRS 608.050
23 26		JURY TRIAL DEMANDED
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	_	
	Page	1 of 11
	Case Number: A-22-84	6801-C

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COMES NOW Plaintiff BethAnne Boschini, 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") sections 608.050 and 608.140. *See Neville v. Eighth Judicial Dist. Court in & for County of Clark*, 406 P.3d 499, 502 (Nev. 2017); *HG Staffing, LLC, et al. v Second Judicial District Court*, Nevada Supreme Court Case No. 79118 (May 7, 2020).

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. Plaintiff made a proper demand for wages due pursuant to NRS 608.140 on January 11, 2022.

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.

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5. Plaintiff demands a jury trial on all issues triable by jury herein.

### **PARTIES**

Plaintiff BethAnne Boschini (hereinafter "Plaintiff" or "Boschini") was at all
relevant times a resident of the State of Nevada and was employed by Defendant as a
non-exempt hourly employee from approximately May of 2019 to the present.

27 7. Defendant Hallmark Retail, LLC ("Defendant") is a foreign limited-liability
 28 company registered with the Nevada Secretary of State.

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

9. At all relevant times, each Defendant was an agent, employee, jointventurer, 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.

10. 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 and abetted the acts and omissions of each and every one of the other times herein, Defendants and abetted the acts and omissions of each and every one of the other befendants thereby proximately causing the damages as herein alleged.

16 11. The Defendants named herein are the employers of the Plaintiff and all 17 Class Members alleged herein. The Defendants are employers engaged in commerce 18 under the provisions of NRS 608.011. The identity of DOES 1-50 is unknown at the time 19 and the Complaint will be amended at such time when the identities are known to 20 Plaintiff. Plaintiff is informed and believes that each Defendants sued herein as DOE is 21 responsible in some manner for the acts, omissions, or representations alleged herein 22 and any reference to "Defendant" or "Defendants" herein shall mean "Defendants and 23 each of them."

### **FACTUAL ALLEGATIONS**

25 12. Plaintiff was employed by Defendant as a non-exempt employee from
26 approximately May of 2019 to the present.

13. Defendant has paid Plaintiff an hourly wage of \$11.00.

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14. Such hourly rate was at all times less than 1 ½ times the applicable minimum wage

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

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

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

18. For instance, during the workweek of December 7, 2021, 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 time clock detail attached hereto as Exhibit I.

19. 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 she worked. *See* a true and correct copy of Plaintiff's December 24, 2021 payslip attached hereto as Exhibit II.

20. Similarly, during the workweek of December 21, 2021, Defendant
scheduled Plaintiff to work and Plaintiff did work over 8 hours in a 24-hour period of time.
See Exhibit I.

21 21. But despite having worked more than 8 hours in a 24-hour period of time,
22 Defendant failed to compensate Plaintiff at 1 ½ times her regular rate of pay for the
23 overtime hours she worked. See a true and correct copy of Plaintiff's January 7, 2022
24 payslip attached hereto as Exhibit III.

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

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170 S. Green Valley Pkwy., Suite 280 Henderson, Nevada 89012 (702) 259-7777 FAX: (702) 259-7704 Gabroy | Messer

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23. This "no daily overtime" policy has always been common to all non-exempt 2 hourly paid employees at Defendant's locations in the state of Nevada.

### **CLASS ACTION ALLEGATIONS**

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

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

8 26. The Nevada Overtime Class is defined as "All hourly paid non-exempt 9 persons employed by Defendant in the state of Nevada who earned less than 1 <sup>1</sup>/<sub>2</sub> times 10 the applicable minimum wage and who worked over eight (8) hours in a workday at any 11 time within 3 years from January 11, 2022 until judgment."

27. The **Waiting Time Wages Class** is defined as "All Nevada Overtime Class Members who are former employees of Defendant."

28. Class treatment is appropriate under Rule 23's class certification mechanism because:

The Classes are Sufficiently Numerous: Upon information and belief, a. Defendant employs, and has employed, in excess of 40 Nevada Overtime Class Members within the applicable time period. Because Defendant is legally obligated to keep accurate payroll records, Plaintiff alleges that Defendant's records will establish the members of the Classes as well as their numerosity.

21 Plaintiff's Claim is Typical to Those of Fellow Class Members: Each b. 22 Class Member is and was subject to the same practices, plans, or policies as Plaintiff: 23 whether Defendant compensated Plaintiff and members of the Class daily overtime 24 wages when they worked over 8 hours in a workday and whether members of the 25 Waiting Time Wages Class are entitled to waiting time wages for the failure to pay them minimum, regular, and overtime wages owed. 26

27 Common Questions of Law and Fact Exist: Common questions of C. 28 law and fact exist and predominate as to Plaintiff and the Class Members, including,

1 without limitation: whether Defendant failed to pay Plaintiff and the Class Members one 2 and one-half times their regular rate for all hours worked in excess of 8 hours a workday 3 and whether Defendant failed to pay the Waiting Time Wages Class Members all their 4 wages due and owing in violation of NRS 608.020-050.

d. Plaintiff is Adequate Representative of the Class: Plaintiff will fairly and adequately represent the interests of the Classes because Plaintiff is a member of the Nevada Overtime Class, she has issues of law and fact in common with all members of the Classes, and her interests are not antagonistic to Class members. Plaintiff and her counsel are aware of their fiduciary responsibilities to Class Members and are determined to discharge those duties diligently by vigorously seeking the maximum possible recovery for Class Members.

12 Predominance/Superior Mechanism: Class claims predominate and e. 13 a class action is superior to other available means for the fair and efficient adjudication of 14 this controversy. Each Class Member has been damaged and is entitled to recovery by 15 reason of Defendant's illegal policy and/or practice of failing to compensate its 16 employees in accordance with Nevada wage and hour law. The prosecution of individual 17 remedies by each Class Member will tend to establish inconsistent standards of conduct 18 for Defendant and result in the impairment of Class Members' rights and the disposition of their interest through actions to which they were not parties.

#### FIRST CAUSE OF ACTION Failure to Pay Overtime Wages in Violation of NRS 608.018 and 608.140 (On Behalf of Plaintiff and the Nevada Overtime Class)

22 29. Plaintiff realleges and incorporates by this reference all the paragraphs 23 above in this Complaint as though fully set forth herein.

24 30. NRS 608.140 provides that an employee has a private right of action for

- 25 unpaid wages.
  - 31. NRS 608.018(1) provides as follows:

An employer shall pay 1 1/2 times an employee's regular wage rate whenever an employee who receives compensation for employment at a rate less than 1 1/2 times

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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.

32. NRS 608.018(2) provides as follows:

An employer shall pay 1 1/2 times an employee's regular wage rate whenever an employee who receives 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.

33. As described above, Defendant maintains a policy and/or practice of illegal shift jamming (i.e., refusing to pay daily overtime when Plaintiff and members of the Nevada Overtime Class worked over 8 hours in a workday). As a result, Plaintiff and Nevada Overtime Class Members have been denied overtime compensation according to Nevada law.

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

#### SECOND CAUSE OF ACTION Waiting Time Wages Pursuant to NRS 608.020-.050 and 608.140 (On Behalf of Plaintiff and the Waiting Time Wages Class)

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

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

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

38. NRS 608.030 provides that "[w]henever an employee resigns or quits his or her employment, the wages and compensation earned and unpaid at the time of the employee's resignation or quitting must be paid no later than...[t]he day on which the employee would have regularly been paid the wages or compensation; or[s]even days after the employee resigns or quits...whichever is earlier."

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

40. NRS 608.050 grants an "employee lien" to each discharged or laid-off employee for the purpose of collecting the wages or compensation owed to them "in the sum agreed upon in the contract of employment for each day the employer is in default, 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."

41. By failing to pay Waiting Time Wages Class Members their minimum, regular, and overtime wages in violation of state and federal law, Defendant has failed to timely remit all wages due and owing to the Waiting Time Wages Class Members.

42. Despite demand, Defendant willfully refused and continues to refuse to pay
Waiting Time Wages Class Members all the wages that were due and owing upon the
termination of their employment.

43. Wherefore, 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, interest, and punitive damages, as provided by law.

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### THIRD CAUSE OF ACTION Injunctive/Declaratory Relief (On Behalf of Plaintiff and the Nevada Overtime Class)

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

45. As Defendant has 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.

46. Plaintiff and the Nevada Overtime Class will suffer irreparable injury if Defendant is not enjoined from the future wrongful retention of wages owed.

47. 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, that there is irreparable harm, and Plaintiff requests that this Honorable Court enter an Order that restrains Defendant from attempting to enforce the alleged unlawful payment practices.

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

49. 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.

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

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

PRAYER FOR RELIEF

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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
	participate in this lawsuit;
2.	For an order appointing Plaintiff as the Representative of the Classes
	her counsel as Class Counsel;
3.	For damages according to proof for overtime compensation under NR
	608.018 and 608.140 for all hours worked over 8 hours per day;
4.	For waiting time wages pursuant to NRS 608.040050 and 608.140;
5.	For a lien on the property where Plaintiff and all Nevada Class Membe
	labored pursuant to NRS 608.050;
6.	For interest as provided by law at the maximum legal rate;
7.	For injunctive relief;
8.	For declaratory relief;
9.	For punitive damages;
10.	For reasonable attorneys' fees authorized by statute;
11.	For costs of suit incurred herein;
12.	For pre-judgment and post-judgment interest, as provided by law; and
13.	For such other and further relief as the Court may deem just and prop

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DATED: January 18, 2022	Respectfully Submitted,
	Gabroy   Messer
	By: <u>/s/ Christian Gabroy</u> Christian Gabroy, Esq. Kaine Messer, Esq. The District at Green Valley Ranch 170 S. Green Valley Pkwy, Suite 280 Henderson, NV 89012 christian@gabroy.com kmesser@gabroy.com
	Mark R. Thierman, Nev. Bar No. 8285 Joshua D. Buck, Nev. Bar No. 12187 Leah L. Jones, Nev. Bar No. 13161 THIERMAN BUCK LLP 7287 Lakeside Drive Reno, Nevada 89511 Tel. (775) 284-1500 Fax. (775) 703-5027 mark@thiermanbuck.com josh@thiermanbuck.com
	Attorneys for Plaintiff
	Page 11 of 11

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# EXHIBIT I

### Time Clock Detail by Site-Employee (R0034)

Site 9033 AMYS HALLMARK SHOP #33

#### Report Seq: 77770497

0110 0000														
Empl Na	me:	Boschini, Beth	nanne			E	Empl ID:	C178221						
Site	Date	Clock In	Clock Out	Ind <u>Total</u>	<u>Regular</u>	<u>от</u>	Sick	<u>Holiday</u>	Vac	<b>Birthday</b>	<u>Bereav</u>	Jury	Adj Date	Adj User ID
9033	11/29/2021	09:00 AM	01:27 PM	4.45	4.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/06/2021	mftfujitsu
9033	11/29/2021	01:30 PM	01:50 PM	0.33	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/06/2021	mftfujitsu
9033	11/30/2021	10:57 AM	04:22 PM	5.42	5.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/06/2021	mftfujitsu
9033	12/1/2021	12:58 PM	05:29 PM	4.52	4.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/06/2021	mftfujitsu
9033	12/1/2021	06:02 PM	08:28 PM	2.43	2.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/06/2021	mftfujitsu
9033	12/3/2021	04:28 PM	09:01 PM	4.55	4.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/06/2021	mftfujitsu
9033	12/7/2021	04:25 PM	08:51 PM	4.43	4.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/7/2021	09:00 PM	09:20 PM	0.33	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/8/2021	10:54 AM	03:40 PM	4.77	4.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/8/2021	04:18 PM	05:23 PM	1.08	1.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/9/2021	01:23 PM	05:56 PM	4.55	4.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/9/2021	06:33 PM	08:22 PM	1.82	1.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/10/2021	04:23 PM	08:50 PM	4.45	4.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/13/2021	mftfujitsu
9033	12/13/2021	01:56 PM	02:22 PM	0.43	0.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
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9033	12/13/2021	10:00 PM	10:25 PM	0.42	0.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
9033	12/14/2021	03:55 PM	08:26 PM	4.52	4.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
Empl Na	me:	Boschini, Beth	nanne			E	Empl ID:	C178221						
<u>Site</u>	Date	<u>Clock In</u>	Clock Out	Ind <u>Total</u>	<u>Regular</u>	<u>от</u>	<u>Sick</u>	<u>Holiday</u>	Vac	<b>Birthday</b>	<u>Bereav</u>	Jury	Adj Date	<u>Adj User ID</u>
9033	12/15/2021	08:55 AM	01:08 PM	4.22	4.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
9033	12/15/2021	01:37 PM	03:18 PM	1.68	1.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
9033	12/16/2021	01:57 PM	05:57 PM	4.00	4.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
9033	12/16/2021	06:21 PM	09:18 PM	2.95	2.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
9033	12/17/2021	01:57 PM	05:49 PM	3.87	3.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/20/2021	mftfujitsu
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9033	12/20/2021	03:57 PM	07:55 PM	3.97	3.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/20/2021	08:22 PM	09:57 PM	1.58	1.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/20/2021	10:00 PM	10:20 PM	0.33	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/21/2021	01:55 PM	06:13 PM	4.30	4.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/21/2021	06:54 PM	09:31 PM	2.62	2.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/22/2021	08:58 AM	01:18 PM	4.33	4.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/22/2021	01:52 PM	03:55 PM	2.05	2.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/23/2021	03:55 PM	07:32 PM	3.62	3.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/23/2021	08:13 PM	09:23 PM	1.17	1.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12/28/2021	mftfujitsu
9033	12/28/2021	03:55 PM	08:15 PM	4.33	4.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	01/04/2022	mftfujitsu
9033	12/29/2021	08:24 AM	01:27 PM	5.05	5.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	01/04/2022	mftfujitsu
9033	12/31/2021	08:26 AM	09:20 AM	0.90	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	01/04/2022	mftfujitsu
9033	12/31/2021	09:30 AM	09:45 AM	0.25	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	01/04/2022	mftfujitsu
			Hours	109.04	109.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Empl	-		worked:	<b>_</b> .		_								
Signa	ature			Date:		Ν	/lanage	r Signatu	re					

# EXHIBIT II

# ORACLE Payroll Payslip Page 1

Employee Full Name	Bethanne Boschini	Employer Name	Hallmark Retail, LLC
Job Title	Corp Stores Sales Leader.49101.Corporate Stores Hourly Corp Stores	Employer Phone Number	816-274-3512
National Identifier		Organization	CORP STORE Las Vegas NV (025-75033)
Employee Number	178221		
Latest Hire Date	24-May-2019	Frequency	Week
Original Hire Date	24-May-2019	Shift	
Adjusted Service Date			
Assignment Number	178221		
Location	HRNV CSR 033 LASVEG		
Position	Corp Stores Sales Leader.CORP STORE.000087802		
Payroll	Biweekly Branch Retail		
Employee Address		Employer Address	2501 McGee, MD164
			Kansas City, MO 64108
			US
	k	The of the second s	

Pay Period and Sa Pay Period	Payment D	ato	Pay Begin Date		Pay End D	Date	P	ay Rate		Annual Salary
Bi-Week				and the second se			+	11.00		
DI-WEEK	1 24-060-202		05-Dec-2021		10 000 20		a daaraa aa aa ahaa ahaa ahaa ahaa ahaa			
Summary										
		Gross		Pre-Tax	Taxes		Ded	uctions		Net Pa
Current		581.24		0.00		54.32		0.00		526.9
YTD	10,794.15			0.00		1,007.93		0.00		9,786.2
Hours and Earnin	as									
Description	9-	Start Date	End Date	Ra	te Cu	rrent Hours	Current Amount	YTD Hou	rs	YTD Amoun
Oth Indirect UnMea	as			11.	00	52.84	581.24	994.	23	10,794.1
Pre Tax Deduction	ıs				Taxes					
Description		Cu	rrent	YTD	Descri	ption		Curr		YTI
	an generging na mantan ang ngang maganina sina panan at ang mamangal na mangalan na ma		a na sana na		Federa				.85	182.1
					Social	Security			.04	669.2
					Medica	are		8	.43	156.5
After Tax Deducti	ons				Accrua	als				
Description			Current YTD		Description			Current		Balanc
			and a second		Hallmark Holiday			0.00		0.0
					Hallma	rk Legacy			0.00	0.0
					Vacation			0.00		0.0
					Sick				0.00	0.0
					Hallma	ark STD		1	0.00	0.0
Tax Withholding	nformation									
Туре	Marital Status		Exempti	ons Sec	Exemp	Additional A	Amount			
Nevada	No State Withhol	ding Tax		0			0.00	0.00		0.0
Federal	Single or married		ly	0			0.00	0.00		0.0
Net Pay Distribut	on									
Deposit/Check N		e		Ac	count Typ	pe	Account Number			Amour
										526.9
Third Party Pay D	istribution									
Deposit/Check N		e		A	count Ty	pe	Account Number			Amou
Other Information	1									
Description			Value							
No Results Found										
Message(s)										
No Message(s) Fc				and the second				and a second stand of the second standards of the		

# EXHIBIT III

## ORACLE Payroll

### Payslip

Employee Full Nam Job Titl National Identifie Employee Numbe Latest Hire Dat Original Hire Dat Adjusted Service Dat Assignment Numbe Locatio Positio Payro Employee Addres	e Corp Stores Sale Stores Hourly.Co r 178221 e 24-May-2019 e 24-May-2019 e r 178221 n HRNV CSR 033 n Corp Stores Sale STORE.0000876 Biweekly Branch	s Leader.49 mp Stores LASVEG s Leader.CC				Employer N er Phone Nur Organiz Frequ Employer Add	nber 81 ation CC ency We Shift Iress 25	6-274-351: DRP STOR eek 01 McGee nnsas City,	DRE Las Vegas NV (025-75033)			
Pay Period and Salary	Payment Date	Pav	Begin Date	Pa	ay End D	ate		Pa	y Rate		Annual Salary	
Pay PeriodPayment DateBi-Week07-Jan-2022			Dec-2021		01-Jan-2022				11.00		22,880.00	
Summary												
		ross	Pre-T			Taxes		Dedu	o.00		Net Pay 350.47	
Current YTD		9.50 9.50		00	and the best sector of the birt of a sector of the sector of the sector of the birt of the sector of t	29.03	and the second		0.00		350.47	
	217	9.00	0.		an ang ang ang ang ang ang ang ang ang a	20.00						
Hours and Earnings Description Oth Indirect UnMeas	Start	Date	End Date	Rate 11.00		rrent Hours 34.50	Current	Amount 379.50	YTD Hor 34	<b>Jrs</b> .50	YTD Amount 379.50	
Pre Tax Deductions					Taxes							
Description		Current		YTD	Descrip Social S Medica	Security			2	rent 3.53 5.50	<b>YTD</b> 23.53 5.50	
After Tax Deductions					Accrua	ls						
Description		Curre	nt	YTD	Descri	otion			C	urrent	Balance	
	ana na mangana ng kanang ng ka					k Holiday	literatification and scart fraction of the state	ni peni mananini sa mananakan manana sa		0.00	0.00	
					Hallma Vacatio	rk Legacy				0.00	0.00	
					Sick	41		III.AP. P.ALLECTOR	ang di kanada di ka pakana kanana ka	0.00	0.00	
					Hallma	rk STD				0.00	0.00	
Tax Withhalding Informat	ion											
Tax Withholding Informat Type Mar	ion ital Status		Exemptions	Sec E	Exemp	Additional	Amount					
and the second	State Withholding Tax		0				0.00		0.00		0.00	
Federal Sing	le or married filing se	parately	0		. diameter and a second		0.00	eres an eres contractions	0.00		0.00	
Net Pay Distribution												
Deposit/Check Number	Bank Name			Acc	ount Typ	e	Account	Number			Amount 350.47	
Third Party Pay Distributi Deposit/Check Number	on Bank Name			Acc	ount Typ	e	Account	Number			Amoun	
Other Information												
Description		Va	lue									
No Results Found												