

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

FEDERAL TRADE COMMISSION and
OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiffs,

v.

STARWOOD CONSULTING, LLC, a limited
liability company, also d/b/a CORPORATE
COMPLIANCE SERVICES,

CORPORATE POSTER SUPPLY, LLC, a limited
liability company, also d/b/a CORPORATE
COMPLIANCE SERVICE CENTER,
CORPORATE COMPLIANCE SERVICES
CENTER, and WORKPLACE COMPLIANCE
SERVICES,

STARWOOD CAPITAL, LLC, a limited liability
company, also d/b/a STARWOOD
MANAGEMENT SERVICES, and

THOMAS HENRY FRED, JR., individually and as
an officer of STARWOOD CONSULTING, LLC,

Defendants.

Case No. 4:18-cv-02368

**AMENDED COMPLAINT FOR
PERMANENT INJUNCTION AND
OTHER STATUTORY AND
EQUITABLE RELIEF**

Plaintiffs, the Federal Trade Commission (“FTC”) and the Office of the Attorney General, State of Florida, Department of Legal Affairs (the “Florida Attorney General”), for their Complaint allege:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement

of ill-gotten monies, and other equitable relief for Defendants' acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), in connection with the sale of government regulation or labor law posters.

2. The Florida Attorney General brings this action pursuant to the Florida Deceptive and Unfair Trade Practices Act ("FDUTPA"), Chapter 501, Part II, Florida Statutes (2018), to obtain preliminary and permanent injunctive relief, rescission or reformation of contracts, consumer restitution, disgorgement of ill-gotten monies, civil penalties, reimbursement of costs and attorney's fees, and other statutory and equitable relief for Defendants' acts or practices in violation of FDUTPA. The Florida Attorney General conducted an investigation and the head of the enforcing authority determined that an enforcement action serves the public interest.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345 and 15 U.S.C. §§ 45(a) and 53(b).

4. The Court has supplemental jurisdiction over the State of Florida's claims pursuant to 28 U.S.C. § 1367.

5. Venue is proper in this district under 28 U.S.C. § 1391(b)(2), (b)(3), (c)(2), and (d) and 15 U.S.C. § 53(b).

PLAINTIFFS

6. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41–58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce.

7. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b) and 56(a)(2)(A).

8. The Florida Attorney General is the enforcing authority under FDUTPA pursuant to Florida Statute section 501.203(2) and is authorized to pursue this action to enjoin violations of FDUTPA and to obtain equitable and other appropriate relief including rescission or reformation of contracts, restitution, the refund of monies paid, civil penalties, disgorgement of ill-gotten monies, attorney's fees and costs, or other statutory and equitable relief as may be appropriate. Fla. Stat. §§ 501.207, 501.2075, and 501.2077.

DEFENDANTS

9. Defendant STARWOOD CONSULTING, LLC ("Starwood"), also doing business as CORPORATE COMPLIANCE SERVICES, is a Texas limited liability company with its principal place of business at 16385 NW 12th Street, Pembroke Pines, Florida 33028. In its 2014 Assumed Name Certificate, Starwood identified its address as 1095 Evergreen Cir #200, The Woodlands, Texas 77380. Starwood transacts or has transacted business in this district and throughout the United States. At all times material to this Complaint, acting alone or in concert with others, Starwood has advertised, marketed, distributed, or sold labor posters to consumers throughout the United States.

10. Defendant CORPORATE POSTER SUPPLY, LLC ("CPS"), also doing business as CORPORATE COMPLIANCE SERVICE CENTER, CORPORATE COMPLIANCE SERVICES CENTER, and WORKPLACE COMPLIANCE SERVICES, is a limited liability

company organized under the laws of both Texas and Florida. CPS's Texas corporate records identify its principal place of business at 1095 Evergreen Cir #200, The Woodlands, Texas 77380. Its Florida corporate records list its principal address at 16385 NW 12th Street, Pembroke Pines, Florida 33028. CPS transacts or has transacted business in this district and throughout the United States. At all times material to this Complaint, acting alone or in concert with others, CPS has advertised, marketed, distributed, or sold labor posters to consumers throughout the United States.

11. Defendant STARWOOD CAPITAL, LLC ("SMS"), also doing business as STARWOOD MANAGEMENT SERVICES, is a Florida limited liability company with its principal place of business at 16385 NW 12th Street, Pembroke Pines, Florida 33028. SMS transacts or has transacted business in this district and throughout the United States. At all times material to this Complaint, acting alone or in concert with others, SMS has advertised, marketed, distributed, or sold labor posters to consumers throughout the United States.

12. Defendant Thomas Henry Fred, Jr., ("Fred") is the president, manager, and organizer of Starwood, the owner and manager of SMS, and the owner, manager, and organizer of CPS. At all times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Starwood, SMS, and CPS, including the acts and practices set forth in this Complaint. Defendant Fred, in connection with the matters alleged herein, transacts or has transacted business in this district and throughout the United States.

13. Defendants STARWOOD, SMS, and CPS (collectively, "Corporate Defendants") have operated as a common enterprise while engaging in the deceptive acts and practices alleged below. Defendants have conducted the business practices described below through an interrelated

network of companies that have common ownership, managers, business functions, employees, and office locations, and that commingled funds. Because these Corporate Defendants have operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below. Defendant Fred has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the Corporate Defendants that constitute the common enterprise.

COMMERCE

14. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44 and as “trade or commerce” is defined in Florida Statutes section 501.203(8).

DEFENDANTS’ BUSINESS ACTIVITIES

15. Since at least July 2014, Defendants have engaged in a scheme to deceptively sell to newly established small businesses (“consumers”) government regulation or labor law posters that can otherwise be obtained from the government for free.

16. Defendants market their labor law posters by sending mailers that are designed to mimic invoice notices being sent by a government agency or authority.

17. Defendants’ mailers are sent in envelopes (an example of which is attached to this Complaint as Exhibit A) that appear official and prominently urge consumers to “OPEN IMMEDIATELY[.] IMPORTANT INFORMATION ENCLOSED[.]”

18. Defendants’ mailers (an example of which is attached to this Complaint as Exhibit B) are entitled “LABOR LAW COMPLIANCE REQUEST FORM” and include a subheading

warning consumers that “Failure to comply with posting regulations can lead to fines up to \$17,000.”

19. To convince consumers that they are receiving an invoice or bill that must be paid, Defendants’ mailers provide a supposed “Business ID” number and a response deadline. Defendants’ mailers direct the businesses to send a check or money order for \$84 and to confirm “all of the company information that is currently on file.”

20. Defendants’ mailers represent that:

Pursuant to federal law 29 USC Sec. 999 (i) & 29 USC Sec. 2005 penalties and risks of non-compliance with posting regulations can lead to potential fines of \$17,000 per instance, for failing to post federally required information. Further, lawsuits can be tolled based on failing to display mandatory posters. . . .

21. Underneath the warning that noncompliance with posting regulations can result in fines of up to \$17,000, Defendants’ mailers cite two provisions of the U.S. Code: 29 USC § 999(i) and 29 USC § 2005. The first provision cited by Defendants, § 999(i), was repealed on October 13, 1982. *See* 29 USC § 999. The second provision, 29 USC § 2005, deals with the enforcement provisions relating to employee polygraph protection. *See* 29 USC § 2005. Under this Section, civil penalties of up to “no more than \$10,000” may be assessed for any violation of the chapter which includes a posting requirement relating to notice of employee polygraph protections. *See* 29 USC § 2003 and 2005.

22. Defendants’ mailers further represent that:

Your business is required by federal law to post a current compliant labor law poster in the workplace. Federal law requires that this poster be placed on the property of the business. Whether you have 1 employee or 1,000 you must post current employment posters in the workplace. The poster must also include information about workers compensation benefits.

23. Defendants' mailers claim to be sent by "Corporate Compliance Services" and include a customer service telephone number with a Washington D.C. (202) area code.

24. When consumers call Defendants' customer service number, (202) 729-9969, they hear a prerecorded message that identifies Defendants as "Corporate Compliance Services Center Labor Law Compliance Request Division." Defendants' prerecorded message gives consumers a menu of options from which to choose that include: learning more about the notice they received; checking the status of a request; reaching the billings and account receivable department; speaking with a representative; and hearing "CCSC's disclaimers and disclosures." Consumers that seek to speak with a representative often receive a message that states, "If you are receiving this message, it means all lines are busy assisting other callers." The message then directs consumers to "try to call again shortly" without giving consumers the option to leave a message.

25. Shortly after paying Defendants' "document fee" using an envelope (an example of which is attached to this Complaint at Exhibit C) provided by Defendants, some consumers receive a poster that includes contact information for the Department of Labor. However, other consumers do not receive the promised labor law poster. Contrary to Defendants' claims, Defendants' posters do not include information about worker compensation benefits.

26. Defendants often send consumers that purchase a poster another mailer (an example of which is attached to this Complaint as Exhibit D) the following year. The subsequent mailer also resembles an invoice sent by a government agency or authority and informs consumers that there have been changes made to the law that require them to purchase an updated labor law poster. Defendants charge consumers another \$84 fee to obtain an "updated" labor law poster. In

fact, consumers are not required to purchase updated labor law posters. Free posters are available from the government and need not be replaced each year.

27. Defendants are not part of or affiliated with any government agency or authority, a fact that they reveal only in disclaimers inconspicuously placed below legal citations, on the back of their mailers, and as an optional selection at the end of their recorded telephone greeting.

28. Consumers nationwide have suffered, and will continue to suffer, substantial injury as a result of Defendants' deceptive practice of sending mailers that mimic invoices from a government agency or authority and duping them into purchasing labor law posters they can obtain for free. Defendants have generated more than \$800,000 from in excess of 9,000 consumers through their scheme.

VIOLATIONS OF THE FTC ACT

29. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce."

30. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

Count I (by Plaintiff FTC) Misrepresentations Made to Induce Payment

31. Through the means described in Paragraphs 15–28, Defendants have represented, directly or indirectly, expressly or by implication, that:

- a. Defendants are part of, or are affiliated with, a government agency or authority;
- b. Consumers are legally required to purchase labor law posters from Defendants; and

c. Consumers owe money to Defendants for a labor law poster.

32. In truth and in fact:

a. Defendants were not part of, or affiliated with, a government agency or authority;

b. Consumers were not legally required to purchase a labor law poster from Defendants; and

c. Consumers did not owe money to Defendants for a labor law poster.

33. Therefore, the making of the representations as set forth in Paragraph 31 of this Complaint constitutes a deceptive act or practice, in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

**VIOLATIONS OF THE FLORIDA DECEPTIVE
AND UNFAIR TRADE PRACTICE ACT
CHAPTER 501, PART II, FLORIDA STATUTES**

34. Section 501.204(1) of the Florida Unfair and Deceptive Trade Practices Act, Chapter 501, Part II, Florida Statutes (2018) states that “unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.”

35. Any entity that willfully engages in a deceptive or unfair act or practice is liable for a civil penalty of up to \$10,000 for each such violation and up to \$15,000 per violation involving senior citizens or military services members, pursuant to Florida Statutes section 501.2077; willful violations occur when the entity knew or should have known that the conduct in question was deceptive or unfair or prohibited by rule. Fla. Stat. § 591,2075.

COUNT II (by Plaintiff Florida Attorney General)

36. Through the means described in Paragraphs 15–28, Defendants have represented, directly or indirectly, expressly or by implication, that:

- a. Defendants are part of or are affiliated with a government agency or authority;
- b. Consumers are legally required to purchase labor law posters from Defendants; and
- c. Consumers owe money to Defendants for a labor law poster.

37. In truth and in fact:

- a. Defendants were not part of or affiliated with a government agency or authority;
- b. Consumers were not legally required to purchase a labor law poster from Defendants; and
- c. Consumers did not owe money to Defendants for a labor law poster.

38. Therefore, the making of the representations as set forth in Paragraph 36 of this Complaint constitutes deceptive, unfair, or unconscionable acts in violation of Section 501.204(1) Fla. Stat. (2018).

CONSUMER INJURY

39. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act and FDUTPA. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court,

Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

THIS COURT’S POWER TO GRANT RELIEF

40. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

41. Pursuant to 28 U.S.C § 1367, this Court has supplemental jurisdiction to allow the Florida Attorney General to enforce state law claims against Defendants in this Court for violations of FDUTPA. Florida Statutes sections 501.207, 501.2075, and 501.2077 authorize this Court to grant such relief as the Court finds necessary to redress injury to consumers resulting from Defendants’ violation of FDUTPA, including injunctive relief, rescission or reformation of contracts, the refund of monies paid, the disgorgement of ill-gotten monies, civil penalties, costs and attorney’s fees, and other statutory and injunctive relief.

PRAYER FOR RELIEF

Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court’s own equitable powers, and Plaintiff the Florida Attorney General, pursuant to Florida Statutes sections 501.207, 501.2075, and 501.2077, and as authorized by the Court’s own equitable powers, request that the Court:

A. Award Plaintiffs such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including but not limited to, temporary and preliminary injunctions and an order freezing assets;

B. Enter a permanent injunction to prevent future violations of the FTC Act and FDUTPA by Defendants;

C. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act and FDUTPA, including but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies;

D. Award civil penalties in an amount up to \$10,000 per violation pursuant to Florida Statutes section 501.2075 and up to \$15,000 per violation, for the willful acts or practices of the Defendants in violation of FDUTPA involving senior citizens or military services members pursuant to Florida Statutes section 501.2077;

E. Award Plaintiffs the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper;

F. Award the Florida Attorney General reasonable attorney's fees pursuant to Florida Statute section 501.2075; and

G. Award such other legal or equitable relief as may be appropriate.

Respectfully submitted,

ALDEN F. ABBOTT
General Counsel

Dated: 3/27/19

/s/ Luis Gallegos
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State of Florida, Department of Legal Affairs



CORPORATE COMPLIANCE SERVICES
Code: LL2856 R. 12/16
Customer Service: 202-729-9969

LABOR LAW COMPLIANCE REQUEST FORM

Failure to comply with posting regulations can lead to fines up to \$17,000

(29 USC Sec. 999(i) & (29 USC Sec. 2005).



Business ID: A1 [REDACTED]
Notice date: 10/13/2017
Document fee: \$84.00 Code: LL2856
PLEASE RESPOND BY: 11/12/2017



T09008

Check Money order
Please make check payable to Corporate Compliance Services

Please detach coupon and mail with your payment

IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM.

Your business is required by federal law to post a current compliant labor law poster in the workplace. Federal law requires that this poster be placed on the property of the business. Whether you have 1 employee or 1,000 you must post current employment posters in the workplace. The poster must also include information about workers compensation benefits.

Pursuant to federal law 29 USC Sec. 999 (i) & 29 USC Sec. 2005 penalties and risks of non-compliance with posting regulations can lead to potential fines in excess of \$17,000 per instance, for failure to post federally required information. Further, lawsuits can be tolled based on failing to display mandatory posters. You must post a compliant employment poster in a conspicuous place in the workplace where all employees and applicants can see it. To obtain your Federal employment labor law poster, please detach the above coupon and return in the enclosed envelope with your document processing fee of \$84.00 Your compliance poster request will take 7-10 business days to process.

STEP 1. COMPANY INFORMATION confirm the below company information.

Company name: [REDACTED]
Address: [REDACTED]
City, State, Zip: [REDACTED]
Zone: [REDACTED]

All company information listed above is the information used in issuance of the federal labor law compliance poster. Please confirm all of the company information that is currently on file. If any information is incorrect please make note of it and include it with your coupon and payment. All corrections will be made prior to issuing the compliance poster. Please allow 1-3 business days for corrections to be made. For your convenience we have simplified this process for you with this form. Mail back the above stub by completing steps 2 and 3 of this form.

STEP 2. Detach the coupon, select your payment method and return in the enclosed envelope with your processing fee of \$84.00

Business ID: A1 [REDACTED]
Notice date: 10/13/2017
Document fee: \$84.00 Code: LL2856
PLEASE RESPOND BY: 11/12/2017

Your compliance document will be mailed to the below address:



STEP 3. Keep the bottom of this request form for your records. This serves as your official receipt.

See reverse for additional information, disclaimers, and disclosures.

Updated with new laws for 2017, IMPORTANT: NEW 2017 POSTER REQUIREMENT.

Effective January 31, 2017 private sector employers must post a new notice issued by the NLRA entitled, "Employee Rights Under the National Labor Relations Act.

You must post a compliant Employment Poster in a conspicuous place in the workplace where all employees and applicants can see it. The poster must also include information about your workers compensation benefits, pay day schedule and emergency contacts.

This Poster includes:

- *Minimum wage
- *Employee rights enforcement
- *USERRA military leave benefits notice
- *Emergency notice
- *Pay day notice
- *Safety and health (OSHA)
- *Workers compensation (DFEH)
- *Family, medical leave, pregnancy.
- *Whistleblower protection
- *Equal employment opportunity
- *Time off
- *Discrimination notice
- *Pregnancy disability leave notice
- *Eligibility requirements (FMLA)
- *Use of leave (FMLA)

Penalties and risk of Non-Compliance:

Penalties for non-compliance are faced with potential fines in excess of \$17,000 for failure to post federally required information. Further lawsuits can be tolled based on failing to display mandatory notices. Tolling the extension of the statute of limitation for failing to post can cause an employer to spend up to 250,000 in legal fees defending a case that otherwise would never exist. Employee and labor issues are top reasons for lawsuits against businesses.

Changes in the law require employers to display the 2017 Employment Law poster in their place of business. Poster includes the following REQUIRED notices.

2017 federal changes:

- *National Labor Relations Act.
- *EDD Notice to employees
- *State and Federal minimum wage orders
- *OSHA job safety & health protection
- *Workers compensation notice
- *DFEH Harassment or Discrimination notice
- *Pregnancy Disability leave notice
- *Family medical leave act
- *Tobacco Smoking
- *Time off to vote notice
- *ADA Equal employment opportunity
- *Whistleblower protection
- *Employee rights enforcement
- *Emergency notice
- *Use of leave

DISCLAIMER: Corporate Compliance Services is a Non-Government publisher of labor law employment posters. These posters are intended to assist employers in meeting their legal obligations under federal labor law posting regulations. This service has not been approved or endorsed by any agency of the government. Individual panels are available to be requested by any agent of the corporation from the government free of charge. This offer serves as a solicitation and not to be intended as a bill due. Corporate compliance services makes no representations or warranties as to the information provided herein. Please allow 10-15 business days for delivery of labor law material.



CORPORATE COMPLIANCE SERVICES

Code: LL2856 R. 11/17

Customer Service: 202-729-9969



2018 LABOR LAW COMPLIANCE RENEWAL

Failure to comply with posting regulations can lead to fines up to \$17,000

(29 USC Sec. 999(i) & (29 USC Sec. 2005).

Business ID: A1 [REDACTED]
 Notice date: 1/2/2018
 Document fee: \$84.00 Code: LL2856
PLEASE RESPOND BY: 2/1/2018



T09859

Check Money order

Please make check payable to Corporate Compliance Services

Please detach coupon and mail with your payment

IMPORTANT! FOLLOW INSTRUCTIONS EXACTLY WHEN COMPLETING THIS FORM.

Reference number	Description	Amount
5000654	Replacement 2018 updated labor law poster	84.00
3400543	Company file update	0.00
	Total	84.00

We have made important changes to your current labor law poster. Your business is required by federal law to post a current compliant labor law poster in the workplace. Penalties and risks of non-compliance with posting regulations can lead to potential fines in excess of \$17,000 per instance, for failure to post federally required information. To obtain your updated Federal employment labor law poster, please detach the above coupon and return in the enclosed envelope with your renewal fee of \$84.00 Your compliance poster renewal request will take 7-10 business days to process.

STEP 1. COMPANY INFORMATION confirm the below company information.

Company name: [REDACTED]
 Address: [REDACTED]
 City, State, Zip: [REDACTED]
 Zone: [REDACTED]

All company information listed above is the information used in issuance of the federal labor law compliance poster. Please confirm all of the company information that is currently on file. If any information is incorrect please make note of it and include it with your coupon and payment. All corrections will be made prior to issuing the compliance poster. Please allow 1-3 business days for corrections to be made. For your convenience we have simplified this process for you with this form. Mail back the above stub by completing steps 2 and 3 of this form.

STEP 2. Detach the coupon, select your payment method and return in the enclosed envelope with your processing fee of \$84.00

Business ID: A1 [REDACTED]
 Notice date: 1/2/2018
 Document fee: \$84.00 Code: LL2856
PLEASE RESPOND BY: 2/1/2018

Your compliance document will be mailed to the below address:



STEP 3. Keep the bottom of this request form for your records. This serves as your official receipt.

See reverse for additional information, disclaimers, and disclosures.

Exhibit D

Updated with new laws for 2018, **IMPORTANT: NEW 2018 POSTER REQUIREMENT.**

Effective January 31, 2018 private sector employers must post a new notice issued by the NLRA entitled, "Employee Rights Under the National Labor Relations Act."

You must post a compliant Employment Poster in a conspicuous place in the workplace where all employees and applicants can see it. The poster must also include information about your workers compensation benefits, pay day schedule and emergency contacts.

This Poster includes:

- *Minimum wage
- *Employee rights enforcement
- *USERRA military leave benefits notice
- *Emergency notice
- *Pay day notice
- *Safety and health (OSHA)
- *Workers compensation (DFEH)
- *Family, medical leave, pregnancy.
- *Whistleblower protection
- *Equal employment opportunity
- *Time off
- *Discrimination notice
- *Pregnancy disability leave notice
- *Eligibility requirements (FMLA)
- *Use of leave (FMLA)

Penalties and risk of Non-Compliance:

Penalties for non-compliance are faced with potential fines in excess of \$17,000 for failure to post federally required information. Further lawsuits can be tolled based on failing to display mandatory notices. Tolling the extension of the statute of limitation for failing to post can cause an employer to spend up to 250,000 in legal fees defending a case that otherwise would never exist. Employee and labor issues are top reasons for lawsuits against businesses.

Changes in the law require employers to display the 2018 Employment Law poster in their place of business. Poster includes the following REQUIRED notices.

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- *EDD Notice to employees
- *State and Federal minimum wage orders
- *OSHA job safety & health protection
- *Workers compensation notice
- *DFEH Harassment or Discrimination notice
- *Pregnancy Disability leave notice
- *Family medical leave act
- *Tobacco Smoking
- *Time off to vote notice
- *ADA Equal employment opportunity
- *Whistleblower protection
- *Employee rights enforcement
- *Emergency notice
- *Use of leave

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