

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS EASTERN DIVISION**

CRYSTAL HOWARD, PAUL GALLOWAY,)	
ROBERT NEWSON, ALVAN YOUNG and)	
JOHN HUEBNER Individually, and on)	
Behalf of All Others Similarly Situated,)	
)	Case No. 08 C 2746
Plaintiffs,)	
)	Judge Gottschall
v.)	
)	Magistrate Judge Valdez
SECURITAS SECURITY SERVICES,)	
USA INC.,)	
)	
Defendant.)	

NOTICE OF COLLECTIVE ACTION LAWSUIT

TO: All individuals who were employed or are currently employed by Securitas Security Services USA, Inc. as Security Guards in Illinois at any time between December 12, 2005 and the present date.

RE: Lawsuit Claiming Unpaid Wages and Overtime Compensation for Current and Former Securitas Security Services USA, Inc. Security Guards under the Fair Labor Standards Act ("FLSA").

THE DISTRICT COURT AUTHORIZED THIS NOTICE. YOU ARE NOT BEING SUED.

PLEASE DO NOT CALL OR WRITE THE JUDGE OR CLERK OF COURT ASSIGNED TO THIS MATTER. THE COURT TAKES NO POSITION REGARDING THE MERITS OF THIS LAWSUIT AND THIS NOTICE IS NOT AN EXPRESSION BY THE COURT OF ANY OPINION AS TO SUCH MERITS.

INTRODUCTION

The purpose of this notice is to: 1) inform you that a lawsuit exists that you might join, 2) advise you of how your rights may be affected by this lawsuit, and 3) instruct you on the procedure for joining in this lawsuit, should you choose to do so.

DESCRIPTION OF LAWSUIT

On May 12, 2008 Crystal Howard, Paul Galloway, Robert Newson, Alvin Young and John Huebner ("Plaintiffs"), who were formerly employed by Securitas Security Services USA, Inc. ("the Company") as Security Guards in the State of Illinois, brought a lawsuit against the Company on behalf of themselves and all others similarly situated claiming that they were not compensated for all the time they worked as required by the Fair Labor Standards Act ("FLSA"). Plaintiffs allege that the Company did not keep accurate time records and required them to work off-the-clock without proper compensation. Specifically, Plaintiffs allege that they were not paid for time that they spent: 1) working before the start of their scheduled shift; 2) working after the end of their shift; 3) attending training, including pre-employment ACT 1, 2 and 3 training; and/or 4) maintaining their uniforms pursuant to Securitas policies and practices. Plaintiffs seek to recover allegedly unpaid wages, costs of the suit, and attorneys' fees. Plaintiffs also seek an additional equal amount as liquidated damages.

The Company denies that it has violated the FLSA and denies that Plaintiffs are entitled to any compensation or damages in this lawsuit. The Company further maintains that the FLSA does not require it to pay for pre-employment training or for uniform maintenance.

This lawsuit is currently in the early pretrial stage. The Court overseeing this lawsuit has not made any determination whether anyone is entitled to any compensation. As of this date, Plaintiffs have only made allegations. The Court will ultimately decide the merits of this case, if any, and how much, if any, unpaid wages will be awarded to the class members. Nothing in this Notice should be viewed as an admission of wrongdoing by the Company.

COMPOSITION OF CLASS

Plaintiffs sue on behalf of all individuals who were employed, or are currently employed, by Securitas USA, Inc. as Security Guards in Illinois during the applicable statute of limitations period.

]YOUR RIGHT TO PARTICIPATE IN THIS LAWSUIT

If you worked, or are currently working as a Securitas Security Guard in the State of Illinois at any time between December 12, 2005 and the present date, you may join this lawsuit by completing and sending a signed copy of the attached "Consent to Join" form to Plaintiffs' lawyers via email, facsimile or U.S. mail to the following:

Securitas Overtime Action c/o
Stephan Zouras, LLP
205 N. Michigan Avenue
Suite 2560
Chicago, Illinois 60601
Telephone: 312-233-1550
Fax: 312-233-1560
lawyers@stephanzouras.com
www.stephanzouras.com

Your Consent to Join form must be postmarked by no later than **April 27, 2009** for you to participate in this case. A first class self-addressed and stamped envelope is included for your convenience. Plaintiffs' lawyers will file with the Court all "Consent to Join" forms that have been filled out, signed, dated, and postmarked on or before **April 27, 2009**.

EFFECT OF JOINING THIS LAWSUIT

If you choose to join the lawsuit, you will be bound by any ruling, judgment or settlement, favorable or unfavorable. While the lawsuit is proceeding, you may be required to provide information, sit for deposition, testify in court, or otherwise participate in the action. If you file a "Consent to Join" form, your continued right to participate in the case may depend upon a later decision by the Court that you are an appropriate participant in accordance with federal law.

By joining this lawsuit, you designate the named Plaintiff as your agent to make decisions on your behalf concerning the litigation, the method and manner of conducting this litigation, the entering of an agreement with Plaintiffs' counsel concerning attorneys' fees and costs, and all other matters pertaining to this lawsuit. These decisions and agreements made and entered into by the representative Plaintiffs will be binding on you if you join this lawsuit. The attorneys for the Plaintiffs may be entitled to receive the payment of attorneys' fees and costs in this lawsuit should there be a recovery or judgment in Plaintiffs' favor. If there is no recovery or judgment in Plaintiffs' favor, you will not be responsible for any attorneys' fees, costs or expenses. If there is a recovery, Plaintiffs' attorneys may receive a part of any settlement obtained or money judgment entered in favor of all Plaintiffs. Any payment of attorneys' fees by Defendant to Plaintiffs' counsel may be subject to prior Court approval.

EFFECT OF NOT JOINING THIS LAWSUIT

If you choose not to join this suit, you will not be affected by any judgment or settlement rendered in this case, whether favorable or unfavorable. If you choose not to join this lawsuit, you are free to retain your own attorney and file your own lawsuit.

STATUTE OF LIMITATIONS

The FLSA only allows the recovery of unpaid wages for a limited period of time. If you choose to join this action, you may be able to recover improperly denied overtime compensation only for overtime hours worked within two years from the date your Consent Form is filed. In some cases if a willful violation is proven, you may recover unpaid overtime within three years from the date your Consent Form is filed. In addition to these periods, the Court tolled the statute of limitations in this case for a period of 61 days, thus changing the two year and three year periods to two years and 61 days, or three years and 61 days if a willful violation is proven.

NO RETALIATION PERMITTED

The law prohibits retaliation against employees for exercising their rights under the FLSA. Therefore, Securitas is specifically prohibited from discharging you or retaliating against you in any other manner because you choose to participate in this action.

YOUR LEGAL REPRESENTATION IF YOU JOIN

If you choose to join the lawsuit, your interests will be represented by counsel for Plaintiffs listed below:

Ryan F. Stephan
James B. Zouras
STEPHAN ZOURAS, LLP
205 N. Michigan Avenue
Suite 2560
Chicago, Illinois 60601
Telephone: 312-233-1550
Fax: 312-233-1560
jzouras@stephanzouras.com
rstephan@stephanzouras.com

Marvin A. Miller
Matthew E. VanTine
MILLER LAW LLC
115 S. LaSalle Street
Suite 2910
Chicago, Illinois 60603
Telephone: 312-332-2400
mmiller@millerlawllc.com
mvantine@millerlawllc.com

Thomas M. Ryan
Law Offices of Thomas M.
Ryan, P.C.
205 N. Michigan Ave., Suite
2560
Tel: 312-233-1553
Cell: 312-545-9096
Fax: 312-233-1560
tom@tomryanlaw.com

FURTHER INFORMATION

Further information about the lawsuit or this notice may be obtained by contacting Plaintiffs' attorneys at the addresses or phone numbers provided above.