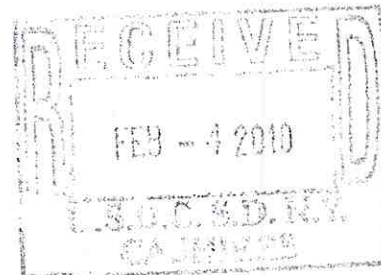


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# Judge Hellerstein

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Collective Plaintiffs*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X

**LOURDES GARCIA, on behalf of herself  
and hose similarly situated,**

**Plaintiffs,**

**COMPLAINT**

v.

**FLSA COLLECTIVE ACTION**

**THE EXECUTIVE CLUB LLC, D/B/A THE  
PENTHOUSE CLUB, THE PENTHOUSE  
CLUB, INC., ROBERT GANS, and MARK  
YACKOW**

**DEMAND FOR JURY TRIAL**

**Defendants.**

-----X

Plaintiff, on behalf of herself and all others similarly situated, alleges as follows:

**JURISDICTION AND VENUE**

1. This Court has original federal question jurisdiction under 28 U.S.C. § 1331 because this case is brought under the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* (“FLSA”). This Court has supplemental jurisdiction over the claims brought under the New York Human Rights Law (“NYSHRL”), N.Y Exec. Law § 296, New York