

U.S. DISTRICT COURT
DISTRICT OF COLORADO
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COURT REPORTER
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

04-D-2174 (CBS)

ROCKY BALDOZIER,
ERIC STACK,
ROBERT REYNOLDS, and
JOK NICHOLSON, on behalf of themselves and all others similarly situated,

Plaintiffs,

AMERICAN FAMILY MUTUAL INSURANCE COMPANY,

Defendant.

**CLASS AND COLLECTIVE ACTION COMPLAINT FOR VIOLATIONS
OF FAIR LABOR STANDARDS ACT AND STATE WAGE AND HOUR LAWS:
CLAIMS FOR DAMAGES AND INJUNCTIVE RELIEF
(JURY TRIAL DEMANDED)**

PRELIMINARY STATEMENT

1. Plaintiffs ROCKY BALDOZIER, ERIC STACK, ROBERT REYNOLDS, and JOK NICHOLSON (collectively "Plaintiffs") bring this action against Defendant American Family Mutual Insurance Company ("American Family") for unpaid overtime compensation and related penalties and damages. The Plaintiffs are either current or former AMERICAN FAMILY vehicle property damage claim adjusters. Plaintiffs allege on behalf of themselves and all similarly-situated AMERICAN FAMILY employees ("Nationwide FLSA Collective Plaintiffs") that AMERICAN FAMILY unlawfully classified Plaintiffs and the Nationwide FLSA Collective Plaintiffs as exempt from overtime payments under Federal law and failed and refused to pay Plaintiffs and members of the Nationwide FLSA Collective Plaintiffs overtime pay for overtime worked, and also that AMERICAN FAMILY failed to keep time records as required by

law. In addition, ROCKY BALDOZIER and ERICK STACK (“Colorado Plaintiffs”) allege on behalf of themselves and all similarly-situated AMERICAN FAMILY employees (“Colorado Class”) that AMERICAN FAMILY’S conduct violated and continues to violate Colorado State law.

2. AMERICAN FAMILY’S practices are in direct violation of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. §201, et seq., and/or the applicable state wage and hour laws described below. Plaintiffs seek injunctive and declaratory relief; overtime premiums for all overtime work required, suffered, or permitted by AMERICAN FAMILY; liquidated and/or other damages as permitted by applicable law; and attorneys’ fees, costs, and expenses of this action.

3. AMERICAN FAMILY’S practice and policy is, and, at all relevant times has been, to willfully fail and refuse to pay overtime compensation due and owing to Plaintiffs and members of the Nationwide FLSA Collective Plaintiffs and Colorado Class in violation of Federal and state laws. AMERICAN FAMILY has instituted and carried out an unlawful policy and practice of treating Plaintiffs as exempt from its legal obligations under Federal and state law to pay overtime compensation and of failing and refusing to pay Plaintiffs and members of the Nationwide FLSA Collective Plaintiffs and Colorado Class overtime pay for overtime worked, notwithstanding that Plaintiffs and members of the Nationwide FLSA Collective Plaintiffs and Colorado Class are not and have not been exempt and are and have been entitled to overtime pay for overtime worked. Defendant AMERICAN FAMILY has treated all of its vehicle property damage claim adjusters, including but not limited to Auto Damage Adjusters, Resident Auto Damage Adjusters, and Field Adjusters, as exempt from overtime pay requirements and has refused to pay all such members of the Nationwide FLSA Collective Plaintiffs and Colorado Class overtime, notwithstanding that no such claim adjusters are or have been exempt but are

each instead entitled to and have been entitled to overtime pay under both Federal and state wage and hour laws.

4. Overtime work by AMERICAN FAMILY vehicle property damage claim adjusters is a common occurrence.

JURISDICTION AND VENUE

5. This Court has original federal question jurisdiction, 28 U.S.C. § 1331, because this case is brought under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.* This Court has supplemental jurisdiction under 28 U.S.C. § 1367 over Plaintiffs’ state law wage and hour law claims, because those claims derive from a common nucleus of operative fact.

6. The District of Colorado has personal jurisdiction because defendant AMERICAN FAMILY is doing business in Colorado, and in this district.

7. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because defendant resides in this district and because a substantial part of the events giving rise to the claim occurred in this district.

THE PARTIES

8. Plaintiff ROCKY BALDOZIER is a resident of Cedar Edge, Colorado. Mr. Baldozier was employed by AMERICAN FAMILY as a vehicle property damage claim adjuster from approximately 1992 to July 2004. Mr. Baldozier regularly worked hours in excess of forty hours per workweek, without receiving overtime compensation as required by both Colorado and federal law.

9. Plaintiff ERIC STACK is a resident of Parker, Colorado. Mr. Stack was employed by AMERICAN FAMILY as a vehicle property damage claim adjuster from approximately October 2000 through August 2003. Mr. Stack regularly worked in excess of forty hours per week, without receiving overtime compensation as required by both Colorado and federal law. Mr. Stack was fired by AMERICAN FAMILY in August 2003 for refusing to

work in excess of forty hours per workweek without receiving overtime compensation as required by both Colorado and federal law.

10. Plaintiff ROBERT REYNOLDS is a resident of Lenexa, Kansas. Mr. Reynolds was employed by AMERICAN FAMILY from approximately September 2001 through September 2003 as an auto property damage claim adjuster. Mr. Reynolds regularly worked in excess of forty hours per workweek without receiving overtime compensation as required by federal law.

11. Plaintiff JOK NICHOLSON is a resident of Janesville, Iowa. Mr. Nicholson was employed by AMERICAN FAMILY from approximately 2001 through August 2004 as a vehicle property damage claim adjuster. Mr. Nicholson regularly worked in excess of forty fours per workweek without receiving overtime compensation as required by federal law.

12. Each of the named Plaintiffs hereby consents to sue with respect to each such Plaintiff's FLSA claim for relief, pursuant to 29 U.S.C. §216(b). The named Plaintiffs' Consents to Sue are attached hereto.

13. Defendant AMERICAN FAMILY underwrites and sells auto insurance to consumers throughout the United States.

COLLECTIVE AND CLASS ACTION ALLEGATIONS

14. Plaintiffs bring the First Claim for Relief for violation of the FLSA as a collective action pursuant to Section 16(b) of the FLSA, 29 U.S.C. §216(b), on behalf of all persons who were, are, or will be employed by defendant AMERICAN FAMILY as auto property damage claim adjusters throughout the United States within three years from commencement of this action, who have not been compensated at one and one-half times the regular rate of pay for all work performed in excess of forty hours per work week.

15. The First Claim for Relief for violations of the FLSA may be brought and maintained as an "opt-in" collective action pursuant to §16(b) of FLSA, 29 U.S.C. §216(b), for

all claims asserted by the Representative Plaintiffs of the Nationwide FLSA Collective Plaintiffs, because the claims of the Plaintiffs are similar to the claims of the the prospective Nationwide FLSA Collective Plaintiffs.

16. Plaintiffs and Nationwide FLSA Collective Plaintiffs are similarly situated, have substantially similar job requirements and pay provisions, and are subject to Defendant AMERICAN FAMILY's common practice, policy or plan of refusing to pay overtime in violation of the FLSA and unlawfully characterizing Plaintiffs and members of the Nationwide FLSA Collective Plaintiffs as exempt employees.

17. Colorado Plaintiffs bring the Second Claim for Relief for violation of Colorado's Minimum Wage Act as a class action, pursuant to Fed. R. Civ. P. 23(a), (b)(2), and (b)(3), on behalf of all vehicle property damage claim adjusters, including, but not limited to, Auto Damage Adjusters, Field Adjusters, Resident Auto Damage Adjusters, and Drive In Claim Adjusters, employed by AMERICAN FAMILY in the state of Colorado during the period of three years prior to the commencement of this action through the date of final disposition of this action whom AMERICAN FAMILY refused to compensate at one and one-half times the regular rate of pay for all work performed in excess of forty hours per work week and/or in excess of twelve hours per day ("Colorado Class").

18. The Colorado Class is so numerous that joinder of all members is impracticable.

19. Common questions of law and fact exist as to members of the Colorado Class that predominate over any questions affecting only individual members and include, but are not limited to, the following:

a. Whether Defendant unlawfully failed to pay overtime compensation in violation of the Colorado Minimum Wage Act, CRS §§ 8-6-101, et seq.;

b. Whether Colorado Plaintiffs and the Colorado Class are non-exempt from the entitlement to overtime compensation for overtime hours worked under the overtime pay

requirements of Colorado law;

c. Whether Defendant's policy and practice of classifying the Colorado Class as exempt from overtime entitlement under Colorado law and Defendant's policy and practice of failing to pay overtime to vehicle property damage claims adjusters violates applicable provisions of Colorado law, including applicable Labor Code sections, applicable Department of Labor Orders, applicable state administrative rules, and applicable state regulations; and

d. The proper measure of damages sustained by members of the Colorado Class.

20. The Colorado Plaintiffs' claims are typical of the members of the Colorado Class. Plaintiffs, like other members of the Colorado Class of vehicle property damage claim adjusters working for Defendant, were subjected to Defendant's policy and practice of refusing to pay overtime in violation of State and Federal law. Colorado Plaintiffs' job duties and claims were and are typical of those of other class members who worked for Defendant as vehicle property damage claims adjusters.

21. Colorado Plaintiffs will fairly and adequately represent and protect the interests of the members of the Colorado Class. Plaintiffs have retained counsel competent and experienced in complex class actions, FLSA, and state labor and employment litigation.

22. Class certification of the Second Claim for Relief is appropriate pursuant to Fed. R. Civ. P.23(b)(2) because Defendant has acted or refused to act on grounds generally applicable to the Colorado Class, making appropriate declaratory and injunctive relief with respect to Colorado Plaintiffs and the Colorado Class. The members of the Colorado Class are entitled to injunctive relief to end AMERICAN FAMILY's common and uniform practices of failing to keep accurate time records and failing to pay overtime premiums for all overtime work performed for the benefit of Defendant.

23. Class certification of the Second Claim for Relief is also appropriate under Fed. R. Civ. P.23(b)(3) because questions of law and fact common to the Colorado Class predominate over any questions affecting only individual members of the Colorado Class, and because a class action is superior to other available methods for the fair and efficient adjudication of this litigation. Defendant's common and uniform policy and practice unlawfully treats members of the Colorado Class as exempt from overtime pay requirements. The damages suffered by individual members of the Colorado Class are small compared to the expense and burden of individual prosecution of this litigation. In addition, class certification is superior because it will obviate the need for unduly duplicative litigation, which might result in inconsistent judgments about AMERICAN FAMILY's policy and practice.

24. Plaintiffs know of no difficulty that might be encountered in the management of this litigation which would preclude its maintenance as a class action.

25. The names and addresses of the Nationwide FLSA Collective Plaintiffs and Colorado Class are available from Defendant AMERICAN FAMILY. To the extent required by law, notice will be provided to the Nationwide FLSA Collective Plaintiffs and Colorado Class via First Class Mail and/or by the use of techniques and a form of notice similar to those customarily used in class actions.

FIRST CLAIM FOR RELIEF

(FLSA Claims, 29 U.S.C. §201, et seq., Brought by All Plaintiffs on Behalf of Themselves and All Nationwide FLSA Collective Plaintiffs)

26. Plaintiffs Rocky Baldozier, Eric Stack, Robert Reynolds, and Jok Nicholson, on behalf of themselves and all Nationwide FLSA Collective Plaintiffs, reallege and incorporate by reference paragraphs 1 through 25 as if they were set forth again herein.

27. At all relevant times, AMERICAN FAMILY has been, and continues to be, an "employer" engaged in interstate "commerce" and/or in the production of "goods" for "commerce," within the meaning of the FLSA, 29 U.S.C. §203. At all relevant times,

AMERICAN FAMILY has employed, and/or continues to employ, “employee[s],” including the Plaintiffs, and each of the collective Nationwide FLSA Collective Plaintiffs. At all relevant times, AMERICAN FAMILY has had gross operating revenues in excess of \$500,000.

28. Each of the Representative Plaintiffs consents to sue in this action pursuant to §16(b) of the FLSA, 29 U.S.C. §216(b).

29. The FLSA requires each covered employer, such as Defendant AMERICAN FAMILY, to compensate all non-exempt employees at a rate of not less than one and one-half the regular rate of pay for work performed in excess of forty hours in a workweek.

30. Plaintiffs and Nationwide FLSA Collective Plaintiffs are not exempt from the right to receive overtime pay under the FLSA and are not exempt from the requirement that their employer pay them overtime compensation under the FLSA. The Nationwide FLSA Collective Plaintiffs are entitled to be paid overtime compensation for all overtime hours worked.

31. At all relevant times, AMERICAN FAMILY had a policy and practice of failing and refusing to pay overtime pay to its vehicle property damage claim adjusters for their hours worked in excess of forty hours per workweek.

32. As a result of AMERICAN FAMILY’s failure to compensate its vehicle property damage claim adjusters, including the Plaintiffs and Nationwide FLSA Collective Plaintiffs, at a rate not less than one and one-half times the regular rate of pay for work performed in excess of forty hours in a workweek, AMERICAN FAMILY has violated, and continues to violate, the FLSA, 29 U.S.C. §§201, et seq., including 29 U.S.C. §207(a)(1), and §215(a).

33. As a result of AMERICAN FAMILY’s failure to record, report, credit, and/or compensate its vehicle property damage claim adjusters, including the Plaintiffs and Nationwide FLSA Collective Plaintiffs, AMERICAN FAMILY has failed to make, keep, and preserve records with respect to each of its employees sufficient to determine the wages, hours, and other

conditions and practices of employment in violation of the FLSA, 29 U.S.C. §§201, et seq., including 29U.S.C. §211(c) and §215(a).

34. The foregoing conduct, as alleged, constitutes a willful violation of the FLSA within the meaning of 29 U.S.C. §255(a).

35. The Plaintiffs, on behalf of themselves and Nationwide FLSA Collective Plaintiffs, seek damages in the amount of their respective unpaid overtime compensation, plus liquidated damages, as provided by the FLSA, 29 U.S.C. §216(b), and such other legal and equitable relief as the Court deems just and proper.

36. The Plaintiffs, on behalf of themselves and Nationwide FLSA Collective Plaintiffs, seek recovery of their attorneys' fees, costs, and expenses of this action to be paid by AMERICAN FAMILY, as provided by the FLSA, 29 U.S.C. §216(b).

SECOND CLAIM FOR RELIEF
(Colorado Minimum Wage Act, C.R.S. §§ 8-6-101,
Brought by Colorado Plaintiffs on Behalf of Themselves
and All Members of the Colorado Class)

37. Plaintiffs Rocky Baldozier and Eric Stack, on behalf of themselves and all prospective members of the Colorado Class, reallege and incorporate by reference paragraphs 1 through 36 as if they were set forth again herein.

38. The foregoing conduct, as alleged, violates the Colorado Minimum Wage Act, C.R.S. §§ 8-6-101, *et seq.*

39. At all relevant times, AMERICAN FAMILY has been, and continues to be, an "employer" within the meaning of the Colorado Minimum Wage Act, C.R.S. §§ 8-6-101, *et seq.*, and Colorado Minimum Wage Order No. 22. At all relevant times, AMERICAN FAMILY has employed, and/or continues to employ, "employee[s]," including Class Representatives Rocky Baldozier, Eric Stack, and each of the members of the prospective Colorado Class, within the meaning of the Colorado Minimum Wage Act, C.R.S. §§ 8-6-101, *et seq.*, and Colorado Minimum Wage Order No. 22.

40. The Colorado Minimum Wage Act requires an employer, such as Defendant, to pay overtime compensation to all non-exempt employees. Colorado Plaintiffs and members of the Colorado Class are not exempt from overtime pay requirements under Colorado law.

41. Members of the Colorado Class are not exempt from the right to receive overtime pay under the Colorado Minimum Wage Act and are not exempt from the requirement that their employer pay them overtime compensation under the Colorado Minimum Wage Act. Members of the Colorado Class do not presently and have not at any time during the Class period qualified under any exemption from the requirement that their employer pay overtime compensation under the Colorado Minimum Wage Act. Members of the Colorado Class are entitled to be paid overtime compensation for all overtime hours worked.

42. At all relevant times, AMERICAN FAMILY had a policy and practice of failing and refusing to pay overtime pay to its vehicle property damage claim adjusters for their hours worked in excess of forty hours per workweek and/or twelve hours per day and failing to ensure that its vehicle property damage claim adjusters had an uninterrupted and “duty free” meal period of at least thirty minutes when their work shift exceeded five consecutive hours.

43. As a result of AMERICAN FAMILY’s failure to pay wages earned and due, and its willful decision to withhold wages earned and due its non-exempt vehicle property damage claim adjusters employed by AMERICAN FAMILY in the State of Colorado, including Plaintiffs Rocky Baldozier, Eric Stack, and members of the prospective Colorado Class, for work performed at the regular hourly wage rate or at a rate not less than one and one-half times the regular rate of pay for work performed in excess of twelve hours daily and/or forty hours in a workweek; and its failure to ensure uninterrupted and “duty free” meal periods of at least thirty

minutes for the Colorado Plaintiffs and Class when their scheduled work shift exceeded five consecutive hours, AMERICAN FAMILY has violated, and continues to violate, the Colorado Minimum Wage Act, C.R.S. § 8-6-106, and Colorado Minimum Wage Order No. 22.

44. As a result of AMERICAN FAMILY's failure to record, report, credit, and furnish to each of its non-exempt vehicle property damage claim adjusters employed by AMERICAN FAMILY in the State of Colorado, including Plaintiffs Rocky Baldozier, Eric Stack, and members of the prospective Colorado Class, their respective wage and hour records showing all wages earned and due for all work performed, AMERICAN FAMILY has failed to make, keep, preserve, and furnish such records in violation of the Colorado Minimum Wage Act and Colorado Minimum Wage Order No. 22.

45. Plaintiffs Rocky Baldozier and Eric Stack, on behalf of themselves and members of the prospective Colorado Class, seek damages in the amount of the respective unpaid wages earned and due at the regular hourly wage rate, and at a rate not less than one and one-half times the regular rate of pay for work performed in excess of twelve daily hours and/or forty hours in a workweek as provided by the Colorado Minimum Wage Act, C.R.S. § 8-6-118, and Colorado Minimum Wage Order No. 22, respectively, and such other legal and equitable relief from AMERICAN FAMILY's unlawful and willful conduct as the Court deems just and proper.

46. Plaintiffs, on behalf of themselves and members of the prospective Colorado Class, seek recovery of attorneys' fees, costs, and expenses of this action to be paid by AMERICAN FAMILY, as provided by the Colorado Minimum Wage Act, C.R.S. § 8-6-118, and Colorado Minimum Wage Order No. 22, respectively.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs on behalf of themselves and all proposed Nationwide FLSA Collective Plaintiffs and Colorado Plaintiffs on behalf of the Colorado Class pray for relief as follows:

1. Certification of this action as a class action on behalf of the proposed Colorado Class;
2. Designation of this action as a collective action on behalf of the proposed Nationwide FLSA Collective Plaintiffs and prompt issuance of notice pursuant to 29 U.S.C. §216(b) to all similarly situated members of the FLSA Opt-In Class, apprising them of the pendency of this action, and permitting them to assert timely FLSA claims in this action by filing individual Consents to Sue pursuant to 29 U.S.C. §216(b);
3. Designation of Plaintiffs Baldozier, Stack, Reynolds, and Nicholson as Representatives of the Nationwide FLSA Collective Plaintiffs;
4. Designation of Plaintiffs Baldozier and Stack as Representatives of the Colorado Class;
5. A declaratory judgment that the practices complained of herein are unlawful under the FLSA, 29 U.S.C. §201, et seq.; the Colorado Minimum Wage Act, CRS §§ 8-6-101, et seq., and Colorado Minimum Wage Order No.22;
6. An injunction against AMERICAN FAMILY and its officers, agents, successors, employees, representatives, and any and all persons acting in concert with it, as provided by law, from engaging in each of the unlawful practices, policies, and patterns set forth herein;
7. An award of damages, including liquidated damages to be paid by AMERICAN FAMILY;

8. Costs and expenses of this action incurred herein, including reasonable attorneys' fees and expert fees;

9. Pre-Judgment and Post-Judgment interest, as provided by law; and

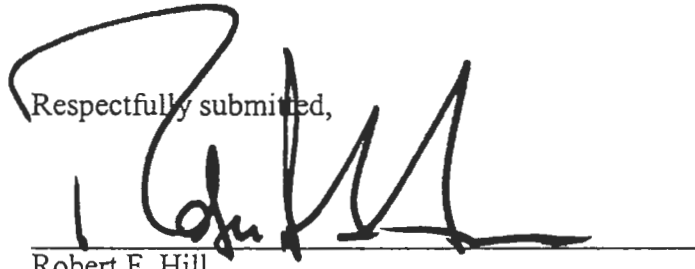
10. Such other and further legal and equitable relief as this Court deems necessary, just, and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all causes of action and claims with respect to which they have a right to jury trial.

Dated: October 20, 2004

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'R. Hill', is written over a horizontal line.

Robert F. Hill

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Rocky Baldozier
17969 Surface Creek Rd.
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CONSENT TO SUE UNDER FAIR LABOR STANDARDS ACT

I work or worked for American Family Insurance Company (American Family) from October 2001 to Sept 2004, in (city) Kansas City, (state) Missouri a vehicle physical damage claims adjuster.

I consent to be a party plaintiff in a lawsuit alleging that American Family has violated the Fair Labor Standards Act and any applicable state labor law. I understand that this lawsuit seeks unpaid overtime and related damages that may be owed to me and other current and former employees of American Family.

I understand that I have the right to choose my own counsel and to pursue my claims solely on my own behalf, and I choose to be represented in this matter by Lief, Cabraser, Heimann & Bernstein, LLP; Rudy, Exelrod & Zieff, LLP; Altshuler, Berzon, Nussbaum, Rubin, & Demain; the Law Offices of Thomas A. Warren; and Hill & Robbins, P.C., and other attorneys with whom they may associate.

Print Name: Robert J. Reynolds

Signature: Robert J. Reynolds

Date Signed: 9-30-2004

Street Address: 12001 W 101 Street

City, State, and ZIP: Lenexa, KS 66215-1962

Telephone Number(s): (Home): 913-859-9266
(Work): 913-747-1666
(Cell): None

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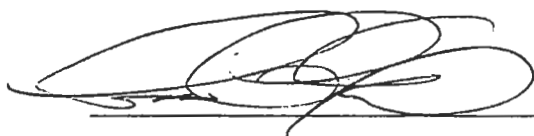
CONSENT TO SUE UNDER FAIR LABOR STANDARDS ACT

I work or worked for American Family Insurance Company (American Family) from OCT 00 to OCT 03, in (city) ENGLEWOOD, (state) CO a vehicle physical damage claims adjuster.

I consent to be a party plaintiff in a lawsuit alleging that American Family has violated the Fair Labor Standards Act and any applicable state labor law. I understand that this lawsuit seeks unpaid overtime and related damages that may be owed to me and other current and former employees of American Family.

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Print Name: ERIC A. STACK

Signature: 

Date Signed: 9/30/04

Street Address: 8299 E. LAKEVIEW DR

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E-Mail Address: EASTACK@HOTMAIL.COM

CONSENT TO SUE UNDER FAIR LABOR STANDARDS ACT

I work or worked for American Family Insurance Company (American Family) from 9-2002 to 8-2004, in (city) Janesville, (state) Iowa as a vehicle physical damage claims adjuster.

I consent to be a party plaintiff in a lawsuit alleging that American Family has violated the Fair Labor Standards Act and any applicable state labor law. I understand that this lawsuit seeks unpaid overtime and related damages that may be owed to me and other current and former employees of American Family.

I understand that I have the right to choose my own counsel and to pursue my claims solely on my own behalf, and I choose to be represented in this matter by Lieff, Cabraser, Heimann & Bernstein, LLP; Rudy, Exel rod & Zieff, LLP; Altshuler, Berzon, Nussbaum, Rubin, & Demain; the Law Offices of Thomas A. Warren; and Hill & Robbins, P.C., and other attorneys with whom they may associate.

Print Name: Jok Nicholson

Signature: Jok Nicholson

Date Signed: 9/29/04

Street Address: 608 main St. / PO Box 448

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CONSENT TO SUE UNDER FAIR LABOR STANDARDS ACT

I work or worked for American Family Insurance Company (American Family) from 1992 to 2004, in (city) Denver, (state) Colorado a vehicle physical damage claims adjuster.

I consent to be a party plaintiff in a lawsuit alleging that American Family has violated the Fair Labor Standards Act and any applicable state labor law. I understand that this lawsuit seeks unpaid overtime and related damages that may be owed to me and other current and former employees of American Family.

I understand that I have the right to choose my own counsel and to pursue my claims solely on my own behalf, and I choose to be represented in this matter by Lieff, Cabraser, Heimann & Bernstein, LLP; Rudy, Exelrod & Zieff, LLP; Altshuler, Berzon, Nussbaum, Rubin, & Demain; the Law Offices of Thomas A. Warren; and Hill & Robbins, P.C., and other attorneys with whom they may associate.

Print Name: Rocky Baldoier

Signature: Rocky Baldoier

Date Signed: 10-1-2004

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