

# **APPENDIX 2**

**IN THE DISTRICT COURT OF MARYLAND  
FOR ANNE ARUNDEL COUNTY**

BOOKHOLDERS, LLC,

Plaintiff,

v.

RILEY DEHORITY, ANNA PLETCH, and  
HANNAH STEINCAMP

Defendants.

Case Nos., D07CV220127000,  
D07CV22013292, and  
D07CV22013293

**AFFIDAVIT OF ANNA PLETCH IN SUPPORT OF DEFENDANTS’  
MOTION TO DISMISS**

I, Anna Pletch, certify as follows:

1. I am a full-time undergraduate student at Virginia Tech and reside in Blacksburg, Virginia.
2. I was employed by BookHolders, LLC (“BookHolders”) in various capacities from approximately January 15, 2022 through July 7, 2022.
3. Attached hereto as “Exhibit A-1” is a true and correct copy of the Employee Arbitration Agreement that I was required to sign as a condition of my employment with BookHolders on January 15, 2022.
4. I was initially paid at a wage rate of \$9.00 per hour.
5. After I was promoted to head clerk in April 2022, I was paid \$10.25 per hour.

6. In June 2022, I learned from a friend that the minimum wage in Virginia is \$11.00 per hour.

7. On or around June 23, 2022, I was told by John Verde, BookHolders' owner, that my wage rate was below \$11.00 because BookHolders maintained a federal certificate that enabled it to employ full-time students at flexible schedules at sub-minimum wage rates.

8. Based on conversations with Riley DeHority and others, I became concerned that BookHolders may be violating Virginia's minimum wage laws by paying me and other employees below \$11.00 per hour.

9. I voluntarily ended my employment with BookHolders on or around July 7, 2022.

10. I submitted a claim to the Virginia Department of Labor and Industry ("DOLI") on or around July 9, 2022, alleging minimum wage violations by BookHolders. Attached hereto as "Exhibit B-1" is a true and correct copy of the claim I submitted to DOLI.

11. Attached hereto as "Exhibit C-1" is a true and correct copy of the letter I received on August 2, 2022 from BookHolders' owner John Verde, which alleged that by filing a complaint with Virginia DOLI, I had breached the Employee Arbitration Agreement that I had signed as a condition of employment

with BookHolders. This letter threatened prompt legal action if I did not withdraw my complaint.

12. As of the date of this writing, I have not withdrawn my claim from DOLI.

I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

Dated: October 20, 2022

DocuSigned by:  
  
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\_\_\_\_\_  
Anna Pletch

# **EXHIBIT A-1**

# Employee Arbitration Agreement

This agreement is entered into on this 15 day of January, 2022 by and between BookHolders, LLC ( hereinafter "Employer"), and

Anne Petal (hereinafter "You") at the current address of

If an employment dispute arises, You agree to submit any such dispute arising out of your employment or the termination of your employment (including, but not limited to, claims of unlawful termination based on race, gender, age national origin, disability, breach of contract, unlawful discrimination or harassment under federal or state statutes or any other bias prohibited by law) exclusively to binding arbitration under the federal Arbitration Act, 9 U.S.C., Section 1. This arbitration shall be the exclusive means of resolving any dispute arising out of your employment or termination from employment by Employer or You, and no other action can be brought by employees in any court or any forum.

By simply accepting or continuing employment with Employer, You automatically agree that arbitration is the exclusive remedy for all disputes arising out of or related to your employment with Employer and You agree to waive all rights to a civil court action regarding your employment and the termination of your employment with Employer; only the arbitrator, and not a judge nor a jury, will decide the dispute.

You must deliver a written request for arbitration to Employer within six (6) months from the date of termination, or six (6) months from the date on which the alleged incident(s) or conduct occurred, and respond within fourteen (14) calendar days to each communication regarding the selection of an arbitrator and the scheduling of a hearing. If Employer does not receive a written request for arbitration from You within six (6) months, or if You do not respond to any communication from six (6) months about the arbitration proceedings within fourteen (14) calendar days, You will have waived any right to raise any claims arising out of your employment, in arbitration and in any court or other forum. Arbitration shall occur in Maryland, by an arbitrator selected by Employer.

You and Employer shall each bear respective costs for legal representation at any such arbitration. The cost of the arbitrator and court reporter, if any, shall be shared equally by both parties.


Nothing contained in this Agreement shall limit the right of the Employer to enforce by court injunction or other equitable relief of your obligations under noncompetition and confidential information provisions.

If, for any reason, any provision of this agreement is held invalid, all other provisions of this agreement shall remain in effect. If this agreement is held invalid or cannot be enforced, then to the full extent permitted by law any prior agreement between the Employer (or any predecessor thereof) and the You shall be deemed reinstated as if this agreement had not been executed.

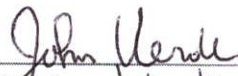
Governing Law:

This agreement shall be construed under laws of the state of Maryland.

The parties have executed this agreement on the date first written above.

Sign:   
Print Name: Anna Plutch

BookHolders

Sign:   
Print Name: John Verde

# **EXHIBIT B-1**



## Virginia Department of Labor and Industry Labor & Employment Law Division

### INSTRUCTIONS FOR COMPLETING "CLAIM FOR WAGES" FORM **\*PLEASE READ AND FOLLOW THE INSTRUCTIONS TO AVOID PROCESSING DELAYS OF YOUR CLAIM**

The attached claim for unpaid wages form must be completed, printed, signed and returned by mail in order for your claim to be investigated. Please complete all areas. If necessary, use a separate sheet of paper to provide additional information or explanation. Send the original claim form and include copies of all documents which will support your claim. You must be able to prove that you are owed wages or had wages wrongfully deducted. Incomplete forms will be returned, causing a delay in processing your claim. If you have not requested payment of your wages from your employer, you **must** do so before filing a claim. Only after you have been denied your wages should you file a claim with this office. **NOTE: You must file your written request with this agency within two (2) years of being denied wages if the wages were earned BEFORE July 01, 2020. If the wages were earned AFTER July 01, 2020, you have three (3) years to file a claim.**

#### EMPLOYEES PAID BY THE HOUR:

If you are claiming wages based on an hourly wage, include the dates, hours, and location(s) where the work was performed for which you were not paid. Be sure to include the **total amount of wages** you are claiming. Please provide documentation of employment and your established rate of pay, such as a paycheck stub; otherwise, our enforcement may be limited. The State Minimum Wage increased to \$11.00 per hour on January 1, 2022. If you are a covered employee, your hourly rate must be at least the state minimum. You can claim pay **for time actually worked only**. **Holiday, vacation, sick, severance, and expense reimbursements** are not collectable under the Virginia Payment of Wage Act.

#### EMPLOYEES PAID BY SALARY:

If you are claiming wages based on a salary rate, include the maximum number of hours and days you were required to or normally worked to receive the salary. Please provide documentation, such as a paycheck stub to verify that the salary or the deductions from salary you are claiming is accurate. Provide dates and hours worked for which you were not paid and include the total amount of wages you are claiming. Note: Virginia's Payment of Wage Act requires **pay for time actually worked ONLY**. You cannot recover pay for time not actually worked.

#### EMPLOYEES PAID BY COMMISSION:

State the total amount of commissions you claim are due and indicate how you arrived at the dollar amount of your claim. Please provide a copy of your commission agreement with your employer. Indicate what you had to do to earn the commission and under what circumstances the commission would become due and payable if no written commission document exists. Account for any and all "draws" you may have received. Identify each specific account for which you seek payment of a commission and state the dollar amount of the commission you claim for each account. Provide documentation such as a paycheck stub or commission report to verify employment and the commission rate you are claiming is accurate.

#### ACCEPTANCE OF THIS CLAIM DOES NOT GUARANTEE COLLECTION OF WAGES:

Upon acceptance of your claim by the Virginia Department of Labor and Industry, **do not assume that your claim is valid and collectible**. In cases where the employer disputes your charges, you will be requested to provide documentary evidence of the amount and validity of your claim. Also, you must provide the company's complete name and mailing address along with the owner's or company representative's full name and address.

Since wage claims are handled by individual compliance officers, we do not provide periodic progress reports. Requests for progress reports only hinder the prompt resolution of your claim. It is imperative to

provide your current and accurate contact information. You will be contacted when your claim has been assigned to a compliance officer for investigation. Your prompt response to the compliance officer is requested. Failing to respond will delay the investigation of your claim. When additional information is needed or a determination is made on your claim, you will be notified.

Please notify this office immediately in *writing* of any change in your address, telephone number, or if you receive payment from your employer. You may contact via U.S. Postal mail to the address below or by email to [laborlaw@doli.virginia.gov](mailto:laborlaw@doli.virginia.gov).

#### **ADDITIONAL INFORMATION:**

For wages earned AFTER July 01, 2020:

In addition to any civil or criminal penalties allowed by law, and without regard to any exhaustion of alternative administrative remedies, if an employer fails to pay wages to an employee, you may sue the employer to recover the wages owed. The court shall award the wages owed, an additional equal amount as liquidated damages, plus prejudgment interest (eight percent accruing from the date the wages were due) and reasonable attorney fees if the court finds in your favor. If the court finds the employer knowingly failed to pay wages to an employee the court shall award the employee an amount equal to triple the amount of wages due and reasonable attorney fees.

## **Mailing Instructions for submitting a Claim for Unpaid Wages:**

### **U.S. Postal mail *only* - Faxed forms cannot be accepted**

Please print and submit your completed claim form to the following address by U.S. Mail:

**Virginia Department of Labor and Industry  
Division of Labor and Employment Law  
600 East Main Street, Ste. 207 Richmond,  
Virginia 23219.**

\*\*\*Remember to sign the claim form and make sure to include the employer's full address as well the total amount of wages claimed. Please include your email address for notices about your claim.

Rev. 1/22

Form : LLVA-POW Rev. 02/2022 Claim # \_\_\_\_\_

\*Official Use Only\*



**VIRGINIA DEPARTMENT OF LABOR AND INDUSTRY  
STATEMENT OF CLAIM FOR UNPAID WAGES**

YOUR FULL NAME: Anna Marie Pletch

1. YES ☐ NO ☐ IS THE BUSINESS CLOSED OR IN BANKRUPTCY?

2. YES ☐ NO ☐ DID YOU HAVE A WRITTEN EMPLOYMENT AGREEMENT? (Attach a photocopy of any agreement you may have.)

3. YES ☐ NO ☐ WERE YOU HIRED TO WORK AS A SUBCONTRACTOR OR AN INDEPENDENT AGENT?

4. YES ☒ NO DID YOU WORK FOR THIS BUSINESS AS A SELF-EMPLOYED PERSON?
5. YES ☒ NO WERE YOU A CORPORATE DIRECTOR, OWNER OR PARTNER IN THE BUSINESS?
6. YES ☒ NO DID YOU FILE A COURT CASE FOR UNPAID WAGES?  
If so, state the name of the court. \_\_\_\_\_
7. YES ☐ NO ☐ HAVE YOU HIRED A LAWYER?
8. YES ☐ NO ☐ EXCEPT FOR TAXES, WERE MONIES SUBTRACTED FROM YOUR WAGES WITHOUT YOUR WRITTEN CONSENT?  
If so, how much money was deducted? \$ \_\_\_\_\_  
What was the purpose of the deduction? \_\_\_\_\_
9. YES ☐ ☐ ☒ NO DID THE BUSINESS GIVE YOU A BAD PAYROLL CHECK? (Attach copies of all payroll checks you were given.)
10. CHECK WHAT APPLIES TO YOU: SALARIED ☐ ☒ HOURLY ☐ COMMISSIONS ☐  
DAILY RATE ☐ PAID BY THE JOB OR PIECE ☐
11. WHAT WAS YOUR RATE OF PAY? \$10.25 PER hour (as head clerk, was previously \$9.75 and then \$9 as clerk and trainee respectively)  
(Hour, Month, Year, Piece, Etc.)
12. HOW OFTEN WERE YOU PAID? Biweekly LAST DATE YOU WERE PAID? 05/31/2022
13. FOR WHAT TIME PERIOD WERE YOU NOT PAID YOUR WAGES? 01/15/2022 THRU 07/10/2022  
(Month – Day – Year) (Month – Day – Year)
14. WHAT IS THE TOTAL GROSS AMOUNT OF UNPAID WAGES YOU CLAIM? \$343  
("Gross" amount means before taxes have been subtracted from your wages.) Note: Sick Leave, Paid Holidays, Vacation Leave, Severance Benefits, Per Diem and Expense Reimbursements are NOT "wages" within the meaning of the wage statute. DO NO INCLUDE THESE ITEMS IN THE DOLLAR AMOUNT OF YOUR CLAIM.
15. WAS THE WORK PART OF A STATE OF VIRGINIA PUBLIC WORKS PROJECT? YES ☐ ☐ NO ☒
16. ARE YOU CLAIMING YOU WERE PAID LESS THAN THE VIRGINIA MINIMUM WAGE? YES ☐ NO ☐
17. DOES YOUR CLAIM INVOLVE A FAILURE TO PAY OVERTIME WAGES? YES ☐ NO ☒

USE THIS SPACE TO SHOW US HOW YOU ARRIVED AT THE DOLLAR AMOUNT OF YOUR WAGE CLAIM. ATTACH COPIES OF PAYROLL CHECK STUBS, "BAD CHECKS", FEDERAL W-2 OR 1099 FORMS, EMPLOYMENT AGREEMENTS AND ANY OTHER SUPPORTING DOCUMENTS YOU MAY HAVE.

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Date: 15-Jan-22

10-Jan-22 to 25-Jan-22

Mon, Jan 10	Tue, Jan 11	Wed, Jan 12	Thu, Jan 13	Fri, Jan 14	Sat, Jan 15	Sun, Jan 16
					12:55 PM	
					1:39 PM	I
					2:10 PM	L
					3:06 PM	
					00:51 (H)	
Accumulated Time					04:00	
					04:00	
					04:00	
Branch					04:00	
Department					04:00	
Absence						

Accumulated Time		Pay Period	Window
Week			
10-Jan-22 to 16-Jan-22		16-Jan-22 to 23-Jan-22	
04:00		21:06	
04:00		21:06	
04:00		21:06	

Pay Period	Window
10-Jan-22 to 23-Jan-22	17-Jan-22 to 26-Jan-22
Not Verified	

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Anna Pletch

Date: 22-Jan-22

10-Jan-22 to 23-Jan-22

Mon, Jan 17	Tue, Jan 18	Wed, Jan 19	Thu, Jan 20	Fri, Jan 21	Sat, Jan 22	Sun, Jan 23
		9:17 AM		2:54 PM	12:57 PM	11:00 AM
		12:06 PM		7:03 PM	3:44 PM L	2:32 PM L
					4:11 PM L	3:03 PM L
					6:03 PM	5:00 PM
					00:27 (1)	00:31 (1)
Accumulated Time						
		02:49		04:09	04:39	05:29
		02:43		04:09	04:39	05:29
		02:19		04:09	04:39	05:29
Branch						
		02:43		04:09	04:39	05:29
Department						
		02:43		04:09	04:39	05:29
Absence						

Accumulated Time	
Week	Pay Period
17-Jan-22 to 23-Jan-22	10-Jan-22 to 23-Jan-22
17:06	24:06
17:36	21:06
17:06	24:06

Pay Period	Window
10-Jan-22 to 23-Jan-22	17-Jan-22 to 23-Jan-22
Not Verified	

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Dates 29-Jan-22

24-Jan-22 to 06-Feb-22

	Mon, Jan 24	Tue, Jan 25	Wed, Jan 26	Thu, Jan 27	Fri, Jan 28	Sat, Jan 29	Sun, Jan 30
In	9:21 AM		9:21 AM		2:59 PM	11:01 AM	11:00 AM
Out	12:02 PM		12:33 PM		6:03 PM	1:51 PM L	2:04 PM L
In						1:59 PM L	2:28 PM L
Out						5:02 PM	5:00 PM
In							
Out							
Lunch (taken)						00:28 (1)	00:32 (1)
Accumulated Time							
Worked Time	02:41		02:36		03:04	05:33	05:20
Meal (Auto 30 after 511)						-00:02	
Regular time	02:41		02:36		03:04	05:31	05:28
Total Time	02:41		02:36		03:04	05:31	05:28
Branch							
Blackburg	02:41		02:36		03:04	05:31	05:28
Department							
Int_Temp	02:41		02:36		03:04	05:31	05:28
Absence							

Accumulated Time		Pay Period	Window
	Week		
	24-Jan-22 to 06-Feb-22	24-Jan-22 to 06-Feb-22	31-Jan-22 to 06-Feb-22
Worked Time	19:22	33:21	
Meal (Auto 30 after 511)	00:02	-00:02	
Regular Time	19:20	33:19	
Total Time	19:20	33:19	

Pay Period 24-Jan-22 to 06-Feb-22

Window 31-Jan-22 to 06-Feb-22

Not Verified

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Date: 05-Feb-22

24-Jan-22 to 06-Feb-22

	Mon, Jan 31	Tue, Feb 01	Wed, Feb 02	Thu, Feb 03	Fri, Feb 04	Sat, Feb 05	Sun, Feb 06
	9:16 AM		8:16 AM		2:57 PM		11:01 AM
	12:00 PM		11:59 AM		6:02 PM		1:33 PM L
							2:04 PM L
							5:01 PM
h (Taken)							30:21 (1)
Accumulated Time							
orked Time	02:42		02:43		03:05		05:29
gular Time	02:42		02:43		03:05		05:29
otal Time	02:42		02:43		03:05		05:29
Branch							
Blackburg	02:42		02:43		03:05		05:29
Department							
VT_Temp	02:42		02:43		03:05		05:29
Absence							

Accumulated Time		Pay Period	
	Week		Window
	31-Jan-22 to 06-Feb-22	24-Jan-22 to 06-Feb-22	
Worked Time	13:59	33:24	
Meal - Auto 30 min x 5 (1)		-00:02	
Regular Time	13:59	33:19	
Total Time	13:59	33:19	

Pay Period	Window
24-Jan-22 to 06-Feb-22	31-Jan-22 to 06-Feb-22
	Not Verified

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Date

12-Feb-22

07-Feb-22 to 23-Feb-22

Mon, Feb 07	Tue, Feb 08	Wed, Feb 09	Thu, Feb 10	Fri, Feb 11	Sat, Feb 12	Sun, Feb 13
3:25 AM		3:27 AM		2:56 PM	11:00 AM	1:25 AM
12:00 PM		12:02 PM		6:02 PM	3:02 PM L	7:00 PM L
					2:53 PM L	2:32 PM L
					5:06 PM	5:05 PM
					00:31 (1)	00:32 (1)

Accumulated Time

Worked Time	02:35	02:37	03:06	05:35	05:05
Regular Time	02:35	02:37	03:06	05:35	05:05
Total Time	02:35	02:37	03:06	05:35	05:05

Branch

Blackburg	02:35	02:37	03:06	05:35	05:05
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Department

VL Temp	02:35	02:37	03:06	05:35	05:05
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Absence

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Accumulated Time

	Week	Pay Period
	07-Feb-22 to 13-Feb-22	07-Feb-22 to 20-Feb-22
Worked Time	18:50	38:36
Meal / Auto Prolate SPT		-00:01
Regular Time	18:50	38:35
Total Time	18:50	38:35

Pay Period

Window

07-Feb-22 to 20-Feb-22	14-Feb-22 to 22-Feb-22
	Not Verified

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Date: 03-Apr-22

04-Apr-22 In 17-Apr-22

	Mon, Apr 04	Tue, Apr 05	Wed, Apr 06	Thu, Apr 07	Fri, Apr 08	Sat, Apr 09	Sun, Apr 10
In	8:13 AM				2:58 PM		
Out	12:16 PM				6:10 PM		2:02 PM
In							5:02 PM
Out							

Accumulated Time		
Worked Time	02:57	03:12
Regular Time	02:57	03:12
Total Time	02:57	03:12

Branch		
Becksburg	02:57	03:12

Department		
YT_Temp	02:57	03:12

Assembly		

Accumulated Time		Pay Period	Window
Week	Pay Period		
04-Apr-22 to 10-Apr-22	04-Apr-22 to 17-Apr-22	04-Apr-22 to 17-Apr-22	11-Apr-22 to 20-Apr-22
			Not Verified

Accumulated Time		
Worked Time	03:09	21:14
Regular Time	03:09	21:14
Total Time	03:09	21:14

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Date: 16-Apr-22

04-Apr-22 to 17-Apr-22

	Mon, Apr 11	Tue, Apr 12	Wed, Apr 13	Thu, Apr 14	Fri, Apr 15	Sat, Apr 16	Sun, Apr 17
In	8:21 AM	8:17 AM	8:17 AM	2:48 PM	1:40 PM		
Out	12:01 PM	12:07 PM		6:09 PM	5:04 PM		

Accumulated Time

Worked Time	02:40	02:50	03:11	03:24
Regular Time	02:40	02:50	03:11	03:24
Total Time	02:10	02:50	03:11	03:24

Branch

Blackburn	02:40	02:50	03:11	03:24
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Department

MT_Temp	02:40	02:50	03:11	03:24
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Absence

	Accumulated Time	Pay Period	Window
	Week	Pay Period	
	11-Apr-22 to 17-Apr-22	04-Apr-22 to 17-Apr-22	
Worked Time	12:05	21:14	
Regular Time	12:06	21:14	
Total Time	12:06	21:14	

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Date: < 23-Apr-22

18-Apr-22 to 01-May-22

	Mon, Apr 18	Tue, Apr 19	Wed, Apr 20	Thu, Apr 21	Fri, Apr 22	Sat, Apr 23	Sun, Apr 24
In	9:20 AM		8:22 AM		8:00 PM	11:02 AM	11:59 AM
Out	12:00 PM		12:03 PM		8:08 PM	1:20 PM	2:35 PM
In						1:54 PM	3:08 PM
Out						5:00 PM	5:04 PM
In							
Out							
Lunch (Taken)						00:34 (1)	00:33 (1)
Accumulated Time							
Worked Time	02:40		02:41		03:09	05:24	04:32
Regular Time	02:40		02:41		03:09	05:24	04:32
Total Time	02:40		02:41		03:09	05:24	04:32
Branch							
Shakusburg	02:40		02:41		03:09	05:24	04:32
Department							
NT_Temp	02:40		02:41		03:09	05:24	04:32
Absence							

Accumulated Time		
	Week	Pay Period
	18-Apr-22 to 24-Apr-22	18-Apr-22 to 01-May-22
Worked Time	18:26	38:25
Regular Time	18:26	38:25
Total Time	18:26	38:25

Pay Period	Window
18-Apr-22 to 01-May-22	25-Apr-22 to 04-May-22
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18-Apr-22 to 01-May-22

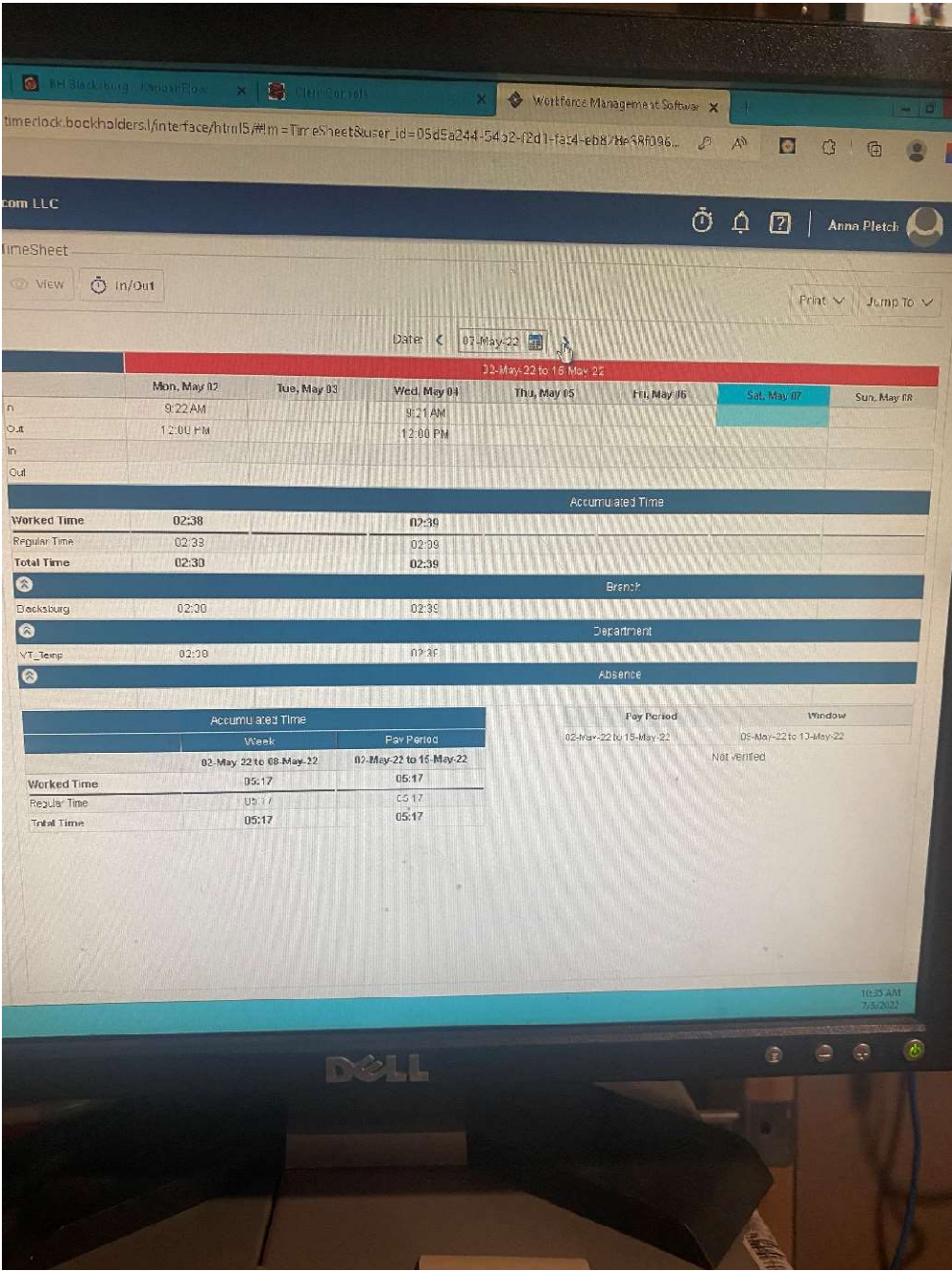
	Mon, Apr 25	Tue, Apr 26	Wed, Apr 27	Thu, Apr 28	Fri, Apr 29	Sat, Apr 30	Sun, May 01
	6:19 AM		8:21 AM		2:53 PM	12:57 PM	11:00 AM
	12:00 PM		12:00 PM		6:00 PM	5:01 PM	2:02 PM
							2:36 PM
							5:05 PM
Break (Taken)							00:34 (1)
Accumulated Time							
Worked Time	02:41		02:39		03:04	04:04	05:31
Regular Time	02:41		02:39		03:04	04:04	05:31
Total Time	02:41		02:39		03:04	04:04	05:31
Branch							
Blackburg	02:41		02:39		03:04	04:04	05:31
Department							
VT_Temp	02:41		02:39		03:04	04:04	05:31
Absence							

	Week	Pay Period
	25-Apr-22 to 01-May-22	18-Apr-22 to 01-May-22
Worked Time	17:59	36:25
Regular Time	17:59	36:25
Total Time	17:59	36:25

Pay Period	Window
18-Apr-22 to 01-May-22	25-Apr-22 to 04-May-22
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Date: 12-M-22

Print Jump To

	Mon, Jun 27	Tue, Jun 28	Wed, Jun 29	Thu, Jun 30	Fri, Jul 01	Sat, Jul 02	Sun, Jul 03
In	9:13 AM	9:14 AM	9:17 AM		9:18 AM	10:57 AM	
Out	11:33 AM	12:38 PM L	12:29 PM L		12:30 PM L	2:06 PM L	
In		1:05 PM L	1:07 PM L		1:01 PM L	2:39 PM L	
Out		6:00 PM	6:03 PM		6:04 PM	6:00 PM	
In							
Out							
Lunch (taken)		00:29 (1)	00:30 (1)		00:31 (1)	00:33 (1)	
Accumulated Time							
Worked Time	02:20	08:17	08:11		08:15	05:30	
Meal - Auto 30 after 5 (1)		-00:01					
Regular Time	02:20	08:15	08:11		08:15	05:30	
Total Time	02:20	08:16	08:11		08:15	05:30	
Branch							
Blacksburg	02:20	08:16	08:11		08:15	05:30	
Department							
YT_Temp	02:20	08:16	08:11		08:15	05:30	
Absence							

Accumulated Time	
Week	Pay Period
27-Jun-22 to 03-Jul-22	27-Jun-22 to 10-Jul-22
Worked Time	32:33
Meal - Auto 30 after 5 (1)	-00:01
Regular Time	32:32
Total Time	32:32

TimeSheet Verification	
Pay Period	Window
27-Jun-22 to 10-Jul-22	04-Jul-22 to 13-Jul-22
PENDING EMPLOYER VERIFICATION	
Verify	

10:33 AM  
7/5/2022





8:37

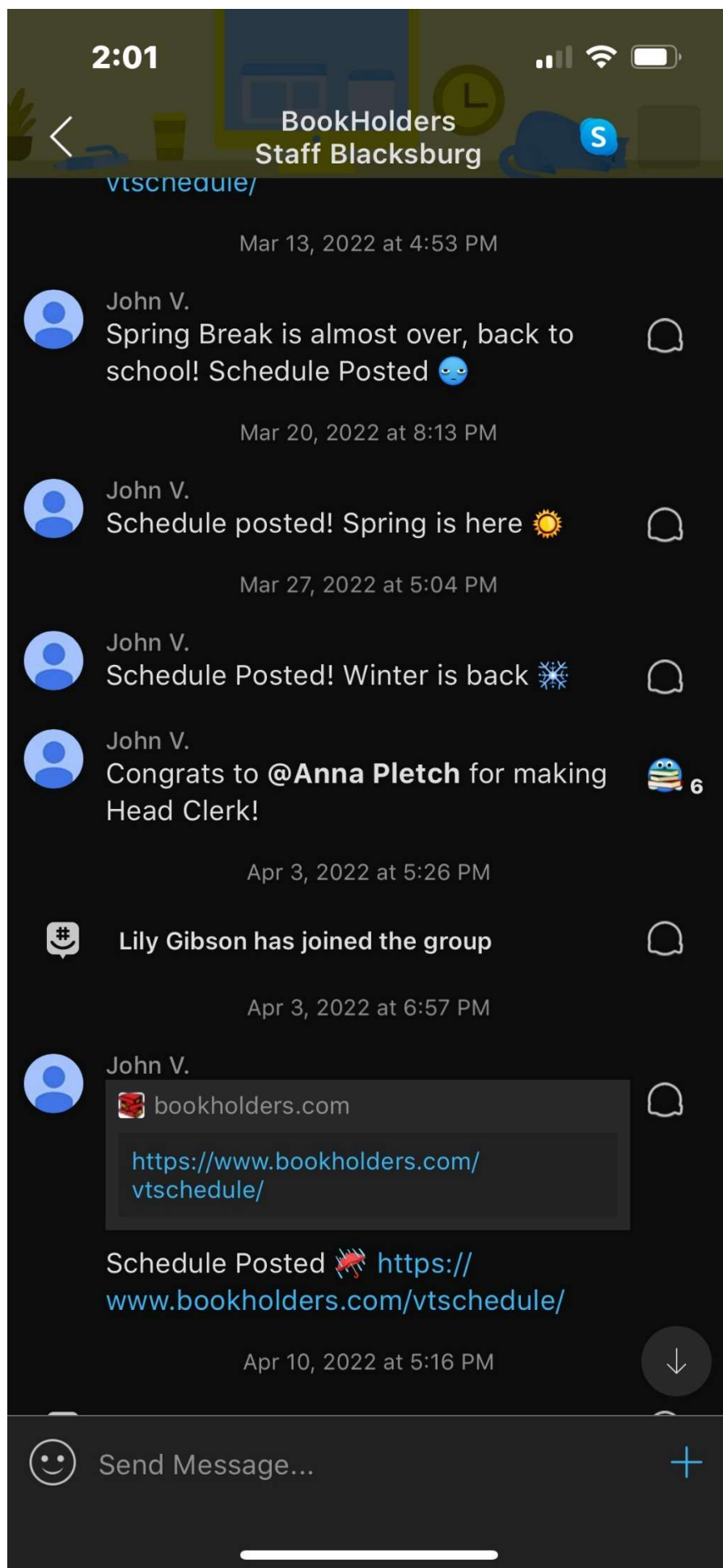


bookholders.com — Private

6:00:00 PM	Anna P.	Kaitlyn R.							
<b>Thursday</b> 7/7/2022	<b>Keyholder</b>	<b>Head Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>
9:20:00 AM	Anna P.	Kate J.							
10:00:00 AM	Anna P.	Kate J.							
10:30:00 AM	Anna P.	Kate J.							
11:00:00 AM	Anna P.	Kate J.							
11:30:00 AM	Anna P.	Kate J.							
12:00:00 PM	Anna P.	Kate J.							
12:30:00 PM	Anna P.	Kate J.							
1:00:00 PM	Anna P.	Kate J.					Kaitlyn R.		
1:30:00 PM	Anna P.	Kate J.					Kaitlyn R.		
2:00:00 PM	Anna P.	Kate J.					Kaitlyn R.		
2:30:00 PM	Anna P.						Kaitlyn R.		
3:00:00 PM	Anna P.						Kaitlyn R.		
3:30:00 PM	Anna P.						Kaitlyn R.		
4:00:00 PM	Anna P.						Kaitlyn R.		
4:30:00 PM	Anna P.						Kaitlyn R.		
5:00:00 PM	Anna P.						Kaitlyn R.		
5:30:00 PM	Anna P.						Kaitlyn R.		
6:00:00 PM	Anna P.						Kaitlyn R.		

<b>Friday</b> 7/8/2022	<b>Keyholder</b>	<b>Head Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>
9:20:00 AM	Anna P.		Heather K.						
10:00:00 AM	Anna P.		Heather K.						
10:30:00 AM	Anna P.		Heather K.						
11:00:00 AM	Anna P.		Heather K.						
11:30:00 AM	Anna P.		Heather K.						
12:00:00 PM	Anna P.		Heather K.					Sarah M.	
12:30:00 PM	Anna P.		Heather K.					Sarah M.	
1:00:00 PM	Anna P.		Heather K.	Jackson K.			Kaitlyn R.	Sarah M.	
1:30:00 PM	Anna P.		Heather K.	Jackson K.			Kaitlyn R.	Sarah M.	
2:00:00 PM	Anna P.		Heather K.	Jackson K.			Kaitlyn R.	Sarah M.	
2:30:00 PM	Anna P.			Jackson K.			Kaitlyn R.	Sarah M.	
3:00:00 PM	Anna P.			Jackson K.			Kaitlyn R.	Sarah M.	
3:30:00 PM	Anna P.			Jackson K.			Kaitlyn R.	Sarah M.	
4:00:00 PM	Anna P.			Jackson K.			Kaitlyn R.	Sarah M.	
4:30:00 PM	Anna P.			Jackson K.			Kaitlyn R.	Sarah M.	
5:00:00 PM	Anna P.			Jackson K.			Kaitlyn R.	Sarah M.	
5:30:00 PM	Anna P.			Jackson K.			Kaitlyn R.		
6:00:00 PM	Anna P.			Jackson K.			Kaitlyn R.		

<b>Saturday</b> 7/9/2022	<b>Keyholder</b>	<b>Head Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>	<b>Clerk</b>
11:00:00 AM						Lauren W.			
11:30:00 AM						Lauren W.			
12:00:00 PM				Jackson K.		Lauren W.			
12:30:00 PM				Jackson K.		Lauren W.			
1:00:00 PM				Jackson K.		Lauren W.			
1:30:00 PM				Jackson K.		Lauren W.			
2:00:00 PM				Jackson K.		Lauren W.			
2:30:00 PM				Jackson K.		Lauren W.			
3:00:00 PM				Jackson K.		Lauren W.			
3:30:00 PM				Jackson K.		Lauren W.			
4:00:00 PM				Jackson K.		Lauren W.			
4:30:00 PM				Jackson K.		Lauren W.			
5:00:00 PM				Jackson K.		Lauren W.			





Hours Worked (a)  
by Pay Period:

Paycheck (b) ← obtained from my mobile deposit records @ my bank

est. rate:  $(\frac{b}{a})$

Pay Period	Hours Worked (a)	Paycheck (b)	Est. Rate
Jan 10-23	21:06	\$175.04	* Known \$9/hr (training)
Jan 24-Feb 6	33:32	\$256.85	~ \$9/hr
Feb 7-Feb 20	38:36	\$320.32	<del>~ \$9.75/hr</del>
Feb 21-Mar 6	19:35	\$174.22	~ \$9.75/hr
Mar 7-20	19:32	\$173.51	~ \$9.75/hr
Mar 21-Apr 3	38:53	\$320.08	~ \$9.75/hr
Apr 4-17	21:14	\$192.23	~ \$10.25/hr
Apr 18-May 1	36:25	\$326.14	~ \$10.25/hr
May 2-15	5:17	\$50.00	~ \$10.25/hr
Jan 27-July 10	55:33	not yet received	~ \$10.25/hr

\* @ beginning, known rate of \$9/hr  
 $9 \times 21.10 \text{ hr} = \$189.9$  (before taxes)  
 $\frac{175.04}{189.9} = 0.921$   
 $1 - 0.921 = 0.079 \rightarrow$  est. tax rate of 7.9% (Lobbs ~~are~~ subject to change)

- Promoted to head clerk on Mar 27 (2022)

~~54.42~~  $54.42 \cdot (11 - 9) = \$108.84$   
 $116.24 \cdot (11 - 9.75) = \$145.3$   
 $118.48 \cdot (11 - 10.25) = \$88.86$   
\$343

I swear and certify that the information I have provided to the Department of Labor and Industry is true and accurate, and I hereby authorize the Virginia Department of Labor and Industry to release any and all information contained in my complaint file, to investigate my charges and to take any action it deems necessary to enforce the provisions of Section 40.1-29, Code of Virginia. I further authorize a photocopy of this complaint form, together with my supporting documents, to be released to the business I have named in this complaint. I understand that if I knowingly make a false statement on this complaint form, or if I knowingly make a false statement to any state member of the Department of Labor and Industry, I could be subject to a fine of up to \$10,000 or imprisonment for up to 6 months or both.

Anna Pletch

(Signature of Claimant – Please sign in ink.)

*Statement of Claim for Unpaid Wages*

Page 2

# **EXHIBIT C-1**



**BookHolders**

Corporate Address:  
2137 Hallmark Dr  
Gambrills, MD 21054  
301.209.9313

August 2, 2022

Anna Pletch  
[REDACTED]

VIA USPS CERTIFIED MAIL, EMAIL  
CC: B&G LAW LLC

Re: Employee Arbitration Agreement

Dated: 01/22/2022

Dear Ms. Pletch,

We've been informed that you filed a complaint with the Commonwealth of Virginia Department of Labor and Industry regarding your employment with BookHolders. As per the Employee Arbitration Agreement ("EAA") that you signed 01/22/2022, "This arbitration shall be the exclusive means of resolving any dispute arising out of your employment by Employer or you and no other action can be brought by employees in any court or any forum". The act of filing a complaint with the Virginia Department of Labor is in breach of this agreement. In addition, you are in breach of Code of Virginia, Article 2, 8.01-581.01 "A written agreement to submit any existing controversy to arbitration or a provision in a written contract to submit to arbitration any controversy thereafter arising between the parties is valid, enforceable and irrevocable", "This article also applies to arbitration agreements between employers and employees".

This complaint must be closed immediately to avoid costs and administrative damages. You would be responsible for any of those costs and damages, including any legal costs.

If the complaint is not closed by 08/08/22 and a reply has not been received to that effect, appropriate legal action will commence. Please find attached a copy of your EAA.

All rights are hereby reserved.

Sincerely,

John Verde  
BookHolders.com