

SOL:PSM:as
14340-14345

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK

WILLIAM E. BROCK, Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

SUPERIOR CARE, INC.; NATIONAL
NURSING SERVICES, INC.; ANN
T. MITTASCH, Individually and as President;
ROBERT M. RUBIN, Individually and
as Treasurer,

Defendant.

: Civil Action File
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: No. CV-83-5569 (LDW)
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PLAINTIFF'S POST-TRIAL MEMORANDUM OF LAW

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THE EASTERN DISTRICT OF NEW YORK

WILLIAM E. BROCK, Secretary of Labor, United States Department of Labor,	:	Civil Action File
	:	No. CV-83-5569 (LDW)
Plaintiff,	:	
	:	
v.	:	
	:	
SUPERIOR CARE, INC.; NATIONAL NURSING SERVICES, INC.; ANN T. MITTASCH, Individually and as President; ROBERT M. RUBIN, Individually and as Treasurer,	:	
	:	
Defendant.	:	

PLAINTIFF'S POST-TRIAL MEMORANDUM OF LAW^{1/}

This action was brought by the Secretary of Labor under section 17 of the Fair Labor Standards Act, as amended, (29 U.S.C. §201-219) (hereinafter referred to as "The Act") to enjoin defendants from violating the overtime provisions (29 U.S.C. §207) and the recordkeeping provisions (29 U.S.C. §211) of the Act and to restrain the withholding of back wages found due employees. The Secretary also seeks an award of liquidated damages. Liquidated damages may be awarded pursuant to the provisions of section 16(c) of the Act (29 U.S.C. §216(c)).

STATEMENT OF THE CASE

This case involves a question of the employer - employee relationship between the defendants and certain Licensed Practical Nurses and Registered Nurses. The defendants claim the nurses are independent contractors. If it is found that the Licensed Practical Nurses and Registered Nurses are employees of the defendants, plaintiff's claim they are entitled to overtime compensation under the Act. Further, the defendants claim the nurses are nevertheless exempt as

^{1/} The Court has directed that the parties limit the post-trial memorandum to 10 pages. Plaintiff respectfully refers the Court to authorities and argument more fully set forth in Plaintiff's Trial Memorandum.

professionals from the overtime provisions of the Act and the Department of Labor's regulations (29 U.S.C. §213(a)(1); 29 CFR §541.3).

At the trial, plaintiff called to testify a United States Department of Labor Compliance Officer who made several investigations leading to this litigation. The Compliance Officer made computations from the defendants' records to show the amounts of overtime compensation due. Plaintiff's witnesses included several Licensed Practical Nurses (LPNs) and Registered Nurses (RNs). In addition, the plaintiff called as witnesses the defendants' Comptroller and the Director of Branch Training. The substantial evidence shows the LPNs and RNs are hourly paid employees of defendants and are entitled to statutory overtime compensation and liquidated damages.

STATEMENT OF THE ISSUES

A statement of the issues is found at page 3 of Plaintiff's Trial Memorandum.

STATEMENT OF FACTS

The facts are submitted together with this memorandum and referenced herein to Plaintiff's Proposed Findings of Fact.

ARGUMENT

I

THE SECRETARY HAS MET HIS BURDEN OF PROOF TO SHOW THAT DEFENDANTS IMPROPERLY COMPENSATED ALL ITS EMPLOYEES ENGAGED AS RNs AND LPNs BY FAILING TO PAY OVERTIME COMPENSATION

Section 7 of the Act requires that employers pay one and one-half times an employee's regular rate of pay for all hours worked in excess of forty (40) in a workweek. Defendants have failed to make the payments to the LPNs and RNs who worked overtime hours since at least the period of this litigation from December 1980 through the trial of this case.

Defendants admit the nurses on the NCH and TCU payrolls were not paid time and one-half for hours over forty (40) in a week. (Findings of Fact No. 21).

Once the employee has proved that he performed work and has not been paid in accordance with the FLSA, the fact of damage is certain. Anderson v. Mt. Clemens Pottery Co., 328 U.S. 680, 688, 66 S.Ct. 1187, 1192 (1946); Brock v. Some Seto, ____ F.2d ____ (9th Cir. No. 85-5826, June 3, 1986) (copy of opinion attached). Here defendants' records show the hours of overtime worked and the absence of premium pay for hours over 40 in each given work week. Where an employee is named, the hours of overtime worked ascertained, the period of employment shown and the pay rate ascertained the plaintiff's prima case is established. Marshall v. R & M Erectors, Inc., 429 F. Supp. 771, 776 (D. Del. 1977); Marshall v. National Freight, Inc., 87 L.C. ¶ 33, 839 (D.N.J. 1979) (copy of opinion attached). Under Mt. Clemens, the Secretary need only produce sufficient evidence to show the amount and extent of the work improperly compensated as a matter of just and reasonable inference, 328 U.S. 687. Donovan v. Bel-Loc Diner, Inc., 780 F.2d 1113 (4th Cir. 1985).

II

NURSES REPORTED ON DEFENDANTS' TCU AND NCH PAYROLLS ARE EMPLOYEES UNDER THE ACT

See Plaintiff's Trial Memorandum, Point I entitled "The 'Economic Reality Test' Is the Proper Test To Apply To Determine Whether the Subject RNs and LPNs Are Independent Contractors" for Supreme Court authorities on the legal test for employment under the FLSA. The trial record is clear that all of the defendants' LPNs and RNs were employees under the relevant legal indicia, irrespective of whether taxes were or were not taken out and irrespective of whether overtime was or was not paid for. (Findings of Facts 22, 23, 24, 25, 26, 27, 28, 29, 39, 40, 46, 47, 49, 50, 52, 53, 54, 55). The record shows that the RNs and LPNs are dependent upon Superior Care for placement into their positions and the corporation sets their wages. The hours are a function of the demand of the job assignment not within the control of the RNs and LPNs. Their income was dependent upon their hours of

work and the jobs available as set by the corporation; the fluctuation in pay does not prove they had their own opportunity for profit and loss as independent contractors. The defendants failed to show the RNs and LPNs had any investment or solicited business or retained management skills necessary for business operation. The nursing skills are an integral part of the company's sole business of providing nursing care. Wirtz v. San Francisco Oakland Helicopter Air Inc., 244 F. Supp 680 ND Cal 1965 aff'd percurian 370 F.2d 328 (9th Cir. 1966)

Because defendants can not show the RNs and LPNs fail the legal tests for employment, they rely on payroll record designations, agreements with individuals and statistics to validate their independent contractor defense. These documents are of no avail. See memorandum and order dated April 22, 1986 in Secretary of Labor v. Superior Care, Inc., (CV-83-5569, Wexler, J.).

The record (Findings of Fact 26, 32, 33, 35, 39, 40, 41, 42, 43, 44, 45, 49, 50, 52) shows that the testimony of the nurses produced by the defendants supported the plaintiff's employment contentions.

Joanie Bridges, defendants' Mobile, Alabama, Administrator testified for the defendants. She claims to have regional responsibilities. Miss Bridges was not a credible witness. Miss Bridges was not candid about herself and attempted to mislead the Court. Miss Bridges first claimed to have done no work for the defendants except management and public relations. Visits in the patients home was strictly "P.R." (Bridges 496-497). She denied being reported on any payroll other than the management payroll. (Bridges 495, 500). When confronted with the evidence of her several pay entries on the TCU/NCH payrolls she then testified she did "hands on nursing" and "private duty nursing" (Bridges 503-504). This was a total contradiction of her earlier testimony. (Bridges 496-497). Bridges then went on to give some evasive responses about being on the TCU and NCH payroll for "tax reasons". However, admitting that she was doing "hands on nursing", the tax

reasons apparently had nothing to do with her managerial work. (Bridges 502, 504-505). Finally, Miss Bridges tells the Court that indeed sometimes she was doing managerial work entirely and then doing "hands on nursing" entirely and then back to management, etc., etc. (Bridges 504-507). If Miss Bridges is to be believed her Alabama operation is totally different, in so far as patient care is concerned, from the rest of the Superior Care operation. At no time has there been a supervisory nurse to visit patients in the home, she claims. (Bridges 498-499). This flies directly in the face of all other evidence. (Finding of Facts 39, 40, 41,; McNamee 326; Mendoza 80-81; Ramsey 189; Thomas 407, 417).

Through Miss Bridges, the defendants presented a clear picture of the employer-employee relationship between Superior Care and its nurses. Defendants' Exhibit F are more akin to employment applications. Some of the documents inquire into the place of employment of the nurse's husband and others inquired into the ages of children and who would care for children. These are hardly the inquires to be made when engaging a professional independent contractor. Finally, the documents themselves are not credible to show a contractual relationship and should not be given any weight to support that defense. Supposedly submitted to show the lack of frequency of employment, the documents suggest that either the record of contacts have only recently been recorded or if contacts were recorded in the past, the recordation was clearly haphazard. According to Defendants' Exhibit F, Jacqueline Murphy received no referrals after four "tries" on April 4, 1986, April 9, 1986, May 19, 1986 and May 27, 1986. It should be noted that the application was completed in July 1980. Plaintiff submits these were not the first attempts in six years, since the Plaintiff's Exhibit 6 and 7 show Miss Murphy is due back wages for overtime worked between January 21, 1981 and December 17, 1982. However, the documents do have great weight in establishing the employment relationship of the Alabama nurses. The documents show:

1. Authorization given to make inquiries from former employers "who might constitute a person who can recommend me for the position applied for".
2. The signing of a non competing agreement.
3. Inquiry as to the total number of exemptions claimed.
4. Questions about marital and family status.
5. Questions about ages of children and who will care for them.
6. Questions about the employment of the applicant's husband.
7. Questions about the previous pay rates in prior employment.

Cross-examination of Gary LaPorta, the defendants' comptroller established that defendants' statistical data was worthless. (Defendants' Exhibit A, C and D). The plaintiff seeks relief for those nurses who in one or more weeks worked over forty hours without receiving time and one-half their regular rate. The statistical charts supposedly contain all nurses who worked for Superior Care. As well it should since the defendants concede there is absolutely no relevant significant difference between those nurses who are considered employees and those who are not. Either all nurses are employees or all are not employees despite defendants' treatment of the taxable payroll nurses as employees. The purpose of the charts was to show lack of permanency of employment and relatively small earnings on average. However, the defendants' own witnesses showed the long lasting relationship Superior Care maintains with some of its employees. (Pyant two years; Thomas two years and continuing; Nwachuku ten years and continuing). Assuming the data base from which the statistics were drawn is a relevant data base; the statistics are meaningless. There is no standard against which the statistics can be measured. Defendants failed to show how the length of the average Superior Care relationship compares with businesses in this country in general or whether people work on average shorter or longer periods for other companies in the industry than nurses work for Superior Care; (LaPorta 545-548), or how the findings compare with other employee groups at Superior Care.

(LaPorta 548). Mr. LaPorta tells us that there is high turnover in the headquarters operation (LaPorta 548-549) which was corroborated by Miss Mendoza, who said she could not get her questions answered because of frequent turnover at Superior Care. (Mendoza 83). The records does show that in addition to high turnover in the office operation there is heavy reliance on part-timers. (LaPorta 550-551). Even managers in Superior Care are part-timers (LaPorta 551-553). Defendants' Exhibits A, C, and D proved nothing. Mr. LaPorta on the otherhand shows that short-term, part-time employment was common to the headquarters operation of Superior Care. If anything, the record is that nurses of Superior Care showed more permanency of employment than the management staff.

The proof shows the LPNs and RNs had a permanent relationship, sometimes for a number of years. The individuals are not employed directly or paid by patients but by the corporate defendant. Thus, the RNs and LPNs are comparable to the musicians in Bartels v. Birmingham, 332 U.S. 126, 132 (1947), who were adjudged employees of the band leader rather than the night clubs because the relations between leader and the performers are permanent, while those between the night club and performers are not. Similarly relations between the nurses and the company are permanent, but those between the nurses and the patients are transient.

III

DEFENDANTS DID NOT MEET THEIR BURDEN OF PROVING THEIR EMPLOYEES ARE EXEMPT WITHIN THE PROFESSIONAL EXEMPTION OF THE FAIR LABOR STANDARDS ACT^{2/}

See Point III of Plaintiff's Trial Memorandum. While nurses may qualify as professional employees in some instances they are not automatically exempt medical personnel under Section 13(a)(1) if they fail to meet the salary test. The trial record is clear that LPNs and RNs were hourly paid, not by fee, salary or

^{2/} Defendants only pleaded the professional exemption provided by 29 CFR §541.3. However, in the pretrial order and momentarily at trial defendants alluded to the administrative exemption. The nurses fail to meet the administrative exemption as well due to the failure to compensate on a salary basis as required by 29 CFR 541.2(e).

fixed amount. (Findings of Fact No. 58). Persons employed on a hourly basis cannot be exempt as salaried professional employees. Donovan v. Carls Drugs Co., Inc., 703 F.2d 650, 652 (2nd Cir. 1983).

IV

THE THREE YEAR STATUTE OF LIMITATIONS OF SECTION 255 OF THE PORTAL TO PORTAL ACT IS APPLICABLE BECAUSE DEFENDANTS' ACTIONS WERE WILLFUL

See Point VII of Plaintiff's Trial Memorandum. The trial record is clear and uncontradicted that this is the third investigation in which overtime violations were found. Only the defendants' excuse is different. (Findings of Fact 16, 19, 26, 60, 61, 62). Willful violations occurred where the defendants knew their business was subject to the FLSA and their pay practices did not conform to the overtime compensation requirements of the FLSA. Carls Drugs Co., bid. In addition, defendants willfully violated the FLSA in acting with a reckless indifference to the Act's requirements by their sham distinction between "employees" and "independent contractors". See e.g. Donovan v. Kaszyki & Sons Contractors, Inc., 599 F.Supp. 860, 870 (S.D.N.Y. 1984) and cases cited.

V

DEFENDANTS FAILED TO PROVE A DEFENSE UNDER SECTION 10 OF THE PORTAL TO PORTAL ACT

Section 10 of the Portal to Portal Act, 29 U.S.C. §259 (1975), provides a defense to an action for backwages under the Act for an employer who, although his actions were otherwise unlawful under the Act,

If he pleads and proves that the act or omission complained of was in good faith in conformity with and in reliance on any written administrative regulation, order, ruling, approval or in trepretation of the administrator of the Wage and Hour Division of the U.S. Department of Labor. Soler v. G&U, Inc., 615 F.Supp 736, 747 (S.D.N.Y. 1985).

"If the employer avails himself of the defense under these sections, he must bear the burden of proof." Clifton D. Matew, Inc. v. Wirtz, 413 F.2d 658, 661-662

(4th Cir. 1969). Defendants have not made the necessary showing. E.E.O.C. v. Home Insurance Co., 672 F.2d 252 263 (2nd Cir. 1982); Soler v. G&U, Inc., Supra. In fact, the evidence is overwhelming to show defendants received Wage/Hour advice repeatedly on how to comply with the Act and did not conform to it, took action to conceal pay practices and promised to comply without any intent to do so. (Findings of Fact 60, 61, 62, 63, 64, 65, 66, 67, 68).

VI

DEFENDANTS FAILED TO PROVE THAT LIQUIDATED
DAMAGES ARE NOT MANDATORY IN THIS ACTION

See Point VIII of Plaintiff's Trial Memorandum. The plaintiff's proof regarding the investigation histories establishes the bad faith dealings of the defendants. (Findings of Fact 60, 61, 62, 63, 64, 65, 66, 67, 68). The proof was uncontradicted. No person on defendants' behalf took the witness stand and took an oath to refute the plaintiff's proof. In particular, Robert M. Rubin, the Chief Executive office of the corporate defendant, and a named defendant himself, failed to testify and deny the testimony of Compliance Officer Mormile on the history of Wage-Hour investigations and prior advice on compliance to Rubin and Superior Care that was not followed. In civil cases, it is generally held that the non-appearance of a litigant at the trial or his failure to testify as to facts material to his case and as to which he has especially full knowledge creates an inference that he refrained from appearing or testifying because the truth, if made to appear, would not aid his contention. United States v. Fields, 102 F.2d 535 (8th Cir. 1939). Secretary v. Kelly Andrews & Bradley, Inc., 341 F.Supp 1201 (S.D.N.Y. 1972). Robert Rubin failed to take the witness stand and claim that "as long as he had been with (the) company, the company never recorded any RN, LPN as an employee except for withholding purposes when they asked that their taxes be taken out." (Mormile 356). The defendants failed to produce Larry Marcus to claim that he had raised the independent contractor issue with Mr. Mormile during Mormile's second

investigation. (Mormile 357). These contentions were implied in defense counsel's cross-examination of Compliance Officer Mormile, but no proof was ever submitted. Obviously, the employers failed to meet the burden that both good faith and a reasonable grounds for their activity existed. Marshall v. Brunner, 668 F.2d 748, 753, 871 (3rd Cir. 1982) Kaszycki, supra, 599 F.Supp.

CONCLUSIONS


For all the foregoing reasons, plaintiff urges this Court to enjoin the defendants from violating the overtime and recordkeeping sections of the Fair Labor Standards Act including the restraint of withholding of overtime compensation due together with liquidated damages in a sum equal to the back wages. Additional back wages due in this action must be ordered to be computed after access to defendants' pay records for the period subsequent to November 1985 for all workweeks through Judgment that the violations continue.

DATED: July 14, 1986
New York, New York

GEORGE R. SALEM
Deputy Solicitor of Labor

PATRICIA M. RODENHAUSEN
Regional Solicitor

BY:



PERCY S. MILLER
Attorney

U.S. DEPARTMENT OF LABOR
Attorneys for Plaintiff.

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U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

SUMMARY OF UNPAID WAGES

PAYMENT TO BE COMPLETED AND ORIGINAL COPY OF RECEIPT (S) MAILED TO OFFICE DESIGNATED BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Vivian Addisan		11-13-81	12-25-81	1	10.37
Barbara Adkins		6-25-82	12-23-83	1	372.32
Lenore Adler		3-25-83	3-25-83	1	40.17
Roslyn J. Adare		6-24-83	7-15-83	1	99.00
Joseph Aias		9-23-83	12-9-83	1	283.40
Hilda Alegre		9-24-82	9-24-82	1	51.00
Darlet Alexander		11-5-82	2-10-83	1	990.88
Jack R. Allen		9-3-82	12-25-82	1	174.25
Linda Alpern		12-30-84	12-30-84	1	43.16
Elsie Alpert		4-22-83	4-22-83		27.05
Ora E. Amann		7-16-82	12-24-82	1	1202.07
Maderia Amfield		12-10-82	3-25-83	1	312.78
Valda Anderson		5-7-82	8-26-83	1	306.00
Dorothy Andrew		3-27-81	12-25-81	1	219.68
Rita Anderson		9-2-83	9-2-83	1	130.00
Sandra Antoine		1-2-81	11-20-81	1	74.13
Sherril Anyosodo		1-15-82	2-19-82	1	29.26
Frank Arch		11-13-81	12-11-81	1	160.00
Penny Archer		4-10-81	6-19-81	1	94.00
Valda Archer		3-11-83	7-1-83	1	124.63

Name and address of establishment

Page 1 of 19 pages

TOTAL

Superior Care Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

EXHIBIT "A"

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
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Jerry Arnott		5-15-81	12-25-81	1	736.50
Leona Ash		12-5-80	6-17-83	1	5533.21
Ev Atwood		12-5-80	12-26-80	1	186.97
Olga LaLus Baez		11-25-83	11-25-83	1	14.86
John Baggett		1-2-81	8-7-81	1	353.05
Claudette Bahadovsingh		12-21-80	12-21-80	1	125.02
Celeste Barid		10-30-81	10-30-81	1	45.00
Annie Baker		1-9-81	12-4-81	1	262.59
Constance K. Baker		8-27-82	8-27-82	1	43.50
Janice Baker		4-9-82	12-23-82	1	625.02
Rosemary Baker		12-5-80	5-15-81	1	636.38
Harold Ballard		12-11-81	10-22-82	1	66.00
Alexander Ballek		10-29-82	3-25-83	1	208.28
Adeline Baptiste		12-5-80	7-3-81	1	4286.68
Victoria Barnard		8-6-82	9-17-82	1	141.56
Timothy Barnes		8-13-82	3-11-83	1	58.50
Frances D. Barr		5-7-82	12-24-82	1	1156.76
Sharon Barrett		5-27-83	7-15-83	1	176.82
Carol Nynn Barth		12-31-82	6-17-83	1	113.36
Brenda Bates		4-2-82	8-13-82	1	24.96

Name and address of establishment

Page 2 of 39 Pages

TOTAL

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Mary L. Bates		8-28-81	11-21-82	1	5041.07
Stephanie Battel		6-5-81	9-18-81	1	120.00
Mildred Baynes		10-21-83	10-21-83	1	52.00
Robert L. Bearden		8-20-82	1-23-84	1	214.21
Eno Beckford		6-22-84	6-22-84	1	31.25
Lydia Bell		12-5-80	7-3-81	1	428.00
Millicent Bell		9-25-81	12-29-82	1	698.53
Maxine Benjamin		12-5-80	6-19-81	1	2023.50
Myrtle Benjamin		1-6-81	6-19-81	1	744.50
Lara Bharucha		1-1-82	10-12-84	1	155.25
Margaret Biolchini		4-30-82	8-12-83	1	268.11
Virginia Bird		5-21-82	12-31-82	1	157.79
Sheena Blair		9-10-82	5-27-83	1	317.52
Susan Blankenship		11-2-84	4-5-85	1	1596.44
Arthur Blossomgame		4-10-81	6-5-81	1	308.00
Rosaval Boatswain		3-13-81	7-31-81	1	3280.50
Sharon Bolton		7-3-81	9-18-81	1	66.93
Vera Belle Bonds		5-15-81	6-19-81	1	58.13
Emmy L. Bonnell		4-15-83	11-2-84	1	23,647.20
Gwen Bonner		2-26-82	7-20-84	1	302.75

TOTAL

Name and address of establishment Page 3 of 39 Pages

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Yolanda Bornea		6-26-81	11-5-82	1	3864.45
Wendy Bower		1-2-81	1-30-81	1	38.63
Sharon Bowman		9-7-84	9-7-84	1	21.00
Molly Sealy - Boyce		3-5-82	5-28-82	1	1314.83
Betty Boyd		9-16-83	12-23-83	1	119.33
Lillie Boyd		7-10-81	1-1-82	1	250.25
Linda Boykin		8-7-81	10-16-81	1	169.19
Barbara Bradley		5-8-81	12-4-81	1	1183.14
June Bradley		11-27-81	12-25-81	1	51.75
Patsy Brannen		9-4-81	1-22-82	1	712.29
Francine Bretts		12-26-80	12-25-81	1	547.62
Joanie Bridges		2-20-81	6-26-81	1	238.00
Loretta Brogan		1-1-82	12-24-82	1	149.50
Marie Brookshire		11-27-81	6-3-83	1	941.29
Beatrice Brown		4-17-81	6-5-81	1	128.00
Janice Brown		3-6-81	3-6-81	1	23.16
Mary Brown		2-27-81	11-27-81	1	143.56
Maryann Brown		5-1-81	10-9-81	1	224.38
Patricia Brown		8-31-81	3-22-85	1	5531.63
Polly Brown		8-26-83	8-26-83	1	22.78

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Barbara Brush		3-20-81	6-19-81	1	77.98
Algretta Bryant		1-2-81	10-12-84	1	297.74
Shirley Bryant		9-17-82	9-17-82	1	18.72
Constance J. Burke		5-17-85	6-7-85	1	220.50
Janette Burley		10-30-81	1-22-82	1	376.25
Barbara Burns		7-10-81	7-10-81	1	162.25
Cheryl J. Burt		1-22-82	6-4-82	1	65.62
Henrietta Burt		4-3-81	6-12-81	1	144.00
Barbara Burton		1-20-81	2-6-81	1	122.28
Frances Burton		1-1-82	7-15-83	1	670.60
Elizabeth Busby		11-13-81	4-15-83	1	2862.09
Lynda F. Byrd		5-7-82	7-29-83	1	4978.11
Dorothy Byrne		5-22-81	7-24-81	1	831.50
Evelyne M. Cadet		5-21-82	6-10-83	1	586.08
Monica Calder		3-6-81	1-15-82	1	4035.00
Ross Callaway		9-25-81	12-25-81	1	467.83
Bernice Callender		9-25-81	10-14-82	1	145.50
Thelma Camp		7-16-82	11-19-82	1	42.00
Mary Campbell		2-11-83	2-11-83	1	84.00
Nona J. Campbell		11-8-85	11-8-85	1	150.00

Name and address of establishment

Page 5 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

SUMMARY OF UNPAID WAGES

PAYMENT TO BE COMPLETED AND ORIGINAL COPY
 OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Ron Lambson		1-8-82	5-12-82	1	434.21
Karon Lancaster		4-19-85	6-7-85	1	59.13
Mary W. Langley		6-5-81	6-19-81	1	32.00
Dorothea Lankford		8-20-82	12-24-82	1	69.97
Eldica Layne		12-5-80	2-1-85	1	9521.74
Maxine Ledbetter		6-4-82	1-13-84	1	888.28
Cathy Lee		8-13-82	12-10-82	1	769.98
Ozelle Lee		11-25-83	12-9-83	1	333.74
Ruth Lenoir		9-9-83	11-18-83	1	646.75
Marietta Leonardo		10-30-81	4-9-82	1	2520.00
Judith Levert		5-24-85	6-21-85	1	15.33
Cynthia Lewis		4-10-81	11-27-81	1	55.75
John C. Lewis		2-19-82	8-31-84	1	809.56
Florence Licata		2-27-81	4-3-81	1	121.88
Nanci Linn		4-15-83	5-27-83	1	195.00
Margorie Linton		3-26-82	7-27-84	1	925.82
Susan Linraments		7-29-83	8-26-83	1	185.00
Mildred Lloyd		7-10-81	9-18-81	1	50.91
Thelma Lockhard		4-16-82	9-24-82	1	431.10
Giraldo Lopez		4-13-84	8-9-85	1	3198.53

Name and address of establishment

Page 21 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

SUMMARY OF UNPAID WAGES

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 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Karen Lorenzer		7-8-83	11-4-83	1	635.30
Helen T. Lovely		4-9-82	8-27-82	1	216.00
Gary Lucas		9-16-83	2-10-84	1	381.65
Robert Luka		7-17-81	9-18-81	1	134.25
Eldica Lyne		3-4-83	12-9-83	1	723.58
Brenda Lyons		1-14-83	1-14-83	1	23.73
Alice Mack		9-30-83	11-18-83	1	50.03
Melanie Mally		2-19-82	7-9-82	1	161.50
Carol Mandaro		11-20-81	12-25-81	1	247.88
Paula Manion		10-15-82	2-4-83	1	427.39
CCharles Mann Sr.		2-12-82	6-11-82	1	720.48
Jean Mansfield		12-5-80	10-29-82	1	2827.91
Carol Marchesani		9-9-83	9-16-83	1	495.31
Immaculee Maret		3-5-82	4-9-82	1	219.77
Mae Marion		1-1-82	8-6-82	1	73.77
Diane Marlow		11-20-81	9-3-82	1	123.24
Beulah Marsh		4-24-81	6-4-82	1	238.02
Sharee Marshall		1-1-83	11-27-84	1	467.50
Velveeta Martells		12-17-82	2-4-83	1	1680.00
Barbara Martin		6-12-81	6-19-81	1	82.00

Name and address of establishment

Page 22 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

SUMMARY OF UNPAID WAGES

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 OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Elizabeth Martin		2-6-81	2-20-81	1	56.38
Sandra Martin		5-13-83	11-1-83	1	1560.00
Kathryn Marvasti		7-15-83	8-26-83	1	102.00
Patricia Mashburn		5-15-81	10-2-81	1	310.27
Eldine Matthews		1-1-82	2-5-83	1	267.84
Beverly Matthewson		4-3-81	12-4-81	1	84.80
Bernard Matuszewski		10-9-81	4-23-82	1	100.86
Ruth Mays		2-19-82	3-26-82	1	434.00
Rosemarie Mazzola		8-12-83	8-12-83	1	39.31
Elizabeth McAleer		11-27-81	7-2-82	1	871.31
Augusta McCall		9-17-82	4-8-83	1	1428.75
Annie McCullough		8-13-82	12-3-82	1	24.75
Rosalee McCurdy		7-24-81	4-30-82	1	1917.41
Regina McDonald		12-31-82	1-28-83	1	54.55
Magdalen Mc Farlane		4-24-81	6-12-81	1	238.00
Joan McGrath		1-30-81	6-19-81	1	118.00
Kathy McHugh		7-3-81	12-4-81	1	169.50
Sonia McKenley		9-9-83	11-25-83	1	1242.20
Mary McMahan		5-21-82	12-24-82	1	556.05
Shirley McNamee		10-22-82	12-24-82	1	45.14

Name and address of establishment

Page 23 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

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 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

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Sarah Mc Whirter		9-3-82	11-12-82	1	198.88
Mary Medley		7-1-83	7-1-83	1	41.50
Faye O. Meggs		6-3-83	7-1-83	1	358.75
Marianne Meissner		11-19-82	5-13-83	1	924.32
Norma Mendez		3-18-83	3-25-83	1	64.67
Celia Mendoza		4-8-83	11-15-85	1	4159.11
Carlos Meranda		8-17-84	12-7-84	1	901.15
Cheryl A. Merritt		9-10-82	12-31-82	1	114.00
Jane Messer		9-2-83	9-2-83	1	47.14
Barbara Messina		1-22-82	3-12-82	1	142.50
June Michaels		7-22-83	11-13-84	1	60.95
Joyce Michaylak		4-6-84	8-31-84	1	378.00
Liz Middlebrook		8-14-81	1-7-83	1	1396.92
Barbara Mielke		1-2-81	8-27-82	1	2010.60
Gloria Mike		1-9-81	1-16-81	1	42.00
Rosina Millan		9-2-83	9-2-83	1	22.26
Marilyn Miller		12-31-82	8-26-83	1	1158.68
Marsha Miller		10-30-81	11-27-81	1	44.56
Steven Miller		2-20-81	3-20-81	1	27.40
Joan Minotto		3-11-83	3-25-83	1	348.10

Name and address of establishment

Page 24 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

SUMMARY OF UNPAID WAGES

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 OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

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Carlos Miranda		12-28-84	3-8-85	1	412.13
Willa Mitchell		6-17-83	10-7-83	1	4348.50
Willa Mitchell		12-5-80	12-3-82	1	13,281.89
Wanda Gail Mize		12-5-80	12-25-81	1	1028.00
Susan Moeller		8-6-82	11-19-82	1	50.00
Joyce Moguel		12-5-80	1-11-85	1	11,164.43
Carol Mondaro		1-1-82	1-15-82	1	234.88
Carol Monella		4-10-81	12-18-81	1	4110.83
Marion Monroe		3-20-84	3-20-84	1	20.25
Cassandra Montague		11-26-82	4-29-83	1	490.58
Cynthia Montgomery		12-30-81	12-25-81	1	137.00
Carol Montiel		10-30-81	8-6-82	1	420.25
Elena Montoya		5-7-82	2-8-85	1	1434.80
Debra Moore		5-21-82	5-21-82	1	22.44
Ethel Moore		5-29-81	12-18-81	1	457.00
Josephine Moreno		12-5-80	9-25-81	1	396.75
Charles M. Morley		5-6-83	8-5-83	1	919.75
Marshall Morris		6-24-83	11-18-83	1	333.72
Betty Morton		5-15-81	6-19-81	1	41.00
Patricia A. Moss		5-28-82	8-19-83	1	1102.04

Name and address of establishment

Page 25 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

SUMMARY OF UNPAID WAGES

PAYMENT TO BE COMPLETED AND ORIGINAL COPY OF RECEIPT (S) MAILED TO OFFICE DESIGNATED BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Delores Mouzon		8-21-81	12-9-83	1	6086.09
Randall Mullins		3-5-82	12-31-82	1	693.00
Laura Munson		7-16-82	3-11-83	1	451.12
Jacqueline Murphy		1-2-81	12-17-82	1	212.22
Claudette Murray		6-19-81	9-11-81	1	340.00
Atsuko Naoe		10-1-82	10-29-82	1	51.79
Yolande Napoleon		12-5-80	12-4-81	1	3425.66
Karen A. Naughton		12-5-80	12-26-80	1	32.48
Mary Negley		9-17-82	4-22-83	1	219.12
Wayne Nesbit		10-7-83	3-30-84	1	1925.53
Bruce Newman		9-23-83	9-14-84	1	3117.93
Judith Nichols		10-9-81	12-18-81	1	127.50
Helen Nivachuku		6-10-83	10-4-85	1	6836.00
Marion Nix		9-25-81	11-5-82	1	127.13
Karen Noonan		6-17-83	7-29-83	1	129.34
Catherine Norman		7-30-82	12-24-82	1	49.45
Terri Northrup		11-4-83	12-23-83	1	520.00
Gladys Oakes		6-17-83	7-1-83	1	64.80
John Oaks		1-1-82	7-23-82	1	1738.62
Katheryne Odell		7-31-81	5-11-84	1	124.00

TOTAL

Name and address of establishment

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

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 OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Fe Olegario		4-17-81	4-1-83	1	552.29
Melody Ololade		1-14-83	3-4-83	1	82.95
Eleanor Onuska		5-27-83	5-27-83	1	40.00
Nancy Olsofsky		11-26-82	1-29-83	1	215.49
Andrea Osenenko		7-9-82	9-10-82	1	920.00
Carloa Ost		1-14-83	1-28-83	1	136.02
Jim Owens		2-11-83	6-3-83	1	496.13
Shawn K. Owens		5-15-81	9-11-81	1	817.14
Mary Owings		5-29-81	9-4-81	1	63.75
Donnie Pace		1-8-82	5-7-82	1	238.94
Lena Pace		12-5-80	8-28-81	1	657.94
Retiniano Pacita		12-7-80	12-7-80	1	27.82
Nelinda Padilo		6-22-84	6-22-84	1	10.00
Belinda Padri*		6-26-81	9-11-81	1	193.53
Belinda Padro**		6-18-82	9-10-82	1	274.92
Herminia Palatino		2-6-81	1-29-82	1	537.98
Cresona Palmer		12-31-82	12-31-82	1	29.20
Francis Palmer		12-5-80	3-20-81	1	25.00
Alma Pareno		1-21-83	10-14-83	1	147.00
Mary Parks		10-14-83	10-14-83	1	57.97

Page 27 of 39 Pages **TOTAL**

Name and address of establishment

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

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 OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
 BY _____

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 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Evelyn Parlan		7-24-81	12-24-82	1	120.00
Sheila Parsons		12-5-80	6-12-81	1	458.57
Virginia Pascal		5-20-83	8-12-83	1	273.21
Madge Pattenjer		7-22-83	11-11-83	1	932.50
Delanie Patterson		12-11-81	10-22-82	1	342.38
Mary E. Paul		4-8-83	6-3-83	1	403.63
Mary Louise Payne		7-2-82	7-2-82	1	37.00
Mary Pearce		5-15-81	8-6-82	1	230.43
Maryann Pearson		9-11-81	9-18-81	1	34.50
Jan Pensis		6-11-82	11-26-82	1	1410.51
Antonieta Pereira		11-26-82	12-10-82	1	452.25
Joann Perez		7-24-81	9-11-81	1	14.00
Annie Peters		1-29-82	4-15-83	1	284.31
Lois Peters		8-12-83	12-31-84	1	893.62
Susan Petito		12-5-80	12-26-80	1	52.50
Charlotte Pewitt		3-12-82	12-10-82	1	986.50
Gardine Phnseta		5-4-84	8-19-84	1	1596.00
Barbara Pinzino		7-3-81	5-28-82	1	1395.59
Maxine Plier		7-4-81	12-25-81	1	170.50
Janice Poate		10-26-84	10-26-84	1	224.00

TOTAL

Name and address of establishment

Page 28 of 39 Pages

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 585 Stewart Ave., Rm. 714
 Garden City, NY 11530

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 BY _____

COMPLIANCE OFFICER _____ DATE _____
 Richard Mormile 2-13-86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Bethany Powell		6-26-81	5-31-85	1	1761.33
Raymond Powers		6-26-81	12-30-84	1	2322.07
Suzanne Prasch		10-1-82	4-1-83	1	154.13
Jean Pratt		7-1-83	12-14-84	1	273.81
Marva Prescod		6-12-81	10-16-81	1	967.00
Sharlyn Prestage		3-19-82	12-10-82	1	78.50
Catherine Price		1-2-81	3-20-81	1	15.41
Sally Price		9-24-82	9-24-82	1	60.46
Jerry Pritchett		5-27-83	9-9-83	1	131.00
Teresa M. Proctor		4-15-83	11-18-83	1	6215.50
Ruth Proper		8-6-82	12-24-82	1	1232.94
Anna Prosser		7-30-82	7-30-82	1	26.00
Carla L. Pursley		4-2-82	12-17-82	1	36.85
Catherine Ralis		5-25-84	7-6-84	1	275.00
Sita Ramdat		9-6-85	9-6-85	1	114.75
Joan Ramirez		3-26-82	4-9-82	1	100.00
Anna Ramsey		12-5-80	6-5-81	1	675.54
Eualee Randolph		1-23-81	5-29-81	1	846.00
Jean Rankin		5-29-81	11-15-85	1	3403.50
Carlos Ratly		7-30-82	8-27-82	1	446.21

TOTAL

Name and address of establishment

Page 29 of 39 Pages

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

U.S. DEPARTMENT OF LABOR
EMPLOYMENT STANDARDS ADMINISTRATION
WAGE AND HOUR DIVISION

585 Stewart Avenue, Room 714
Garden City, New York 11530

COMPLIANCE OFFICER ³¹⁰⁰
Richard Mormile

DATE
2/13/86

SUMMARY OF UNPAID WAGES

PAYMENT TO BE COMPLETED AND ORIGINAL COPY
OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
BY _____

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Delanie C. Reavis		3/4/83	3/4/83	1	62.00
Valentine Reed		5/8/81	8/13/82	1	508.04
Duetta Reid		4/29/83	5/6/83	1	220.00
Joan Reid		3/19/82	12/17/82	1	73.12
Gertrude Reid		6/10/83	12/30/83	1	316.92
David Revel		6/19/81	8/20/82	1	526.01
Eunice Reyes		1/15/82	3/4/83	1	263.31
Kate Rich		2/13/81	3/27/81	1	64.00
Edna Richardson		12/5/80	7/17/81	1	1370.64
Joyce Richardson		8/20/82	10/1/82	1	49.50
Patricia Rigsby		5/7/82	11/12/82	1	975.98
Candida Rivera		7/27/84	7/27/84	1	144.00
Dorothy Roache		10/16/81	12/17/81	1	1654.47
Patricia Roberts		1/21/83	3/11/83	1	110.00
Cleaster Robertson		8/19/83	12/30/83	1	254.43
Kathy R. Robertson		5/14/82	12/24/82	1	655.76
Annie Robinson		2/25/83	3/18/83	1	166.29
Marie Roby		7/23/82	4/1/83	1	60.00
Mary Rodriguez		2/10/84	2/10/84	1	77.00
Mary Rolen		7/29/83	8/5/83	1	14.23

TOTAL

Name and address of establishment:

Page 30 of 39 Pages

Superior Care, Inc.
287 Northern Blvd.
Great Neck, NY 11021

*Column 4-Code
FLSA 1
PCA 2
SCA 3
DBRA 4
CWHSSA 5
CCPA 7

U.S. DEPARTMENT OF LABOR
EMPLOYMENT STANDARDS ADMINISTRATION
WAGE AND HOUR DIVISION

SUMMARY OF UNPAID WAGES

PAYMENT TO BE COMPLETED AND ORIGINAL COPY
OF RECEIPT (S) MAILED TO OFFICE DESIGNATED
BY _____

COMPLIANCE OFFICER
Richard Mormile

DATE
2/13/86

1. NAME	2. ADDRESS	3. PERIOD COVERED by Workweek Ending Dates		4. ACTS (See code below)*	5. GROSS AMOUNTS DUE
Virginia Rolling		12/4/81	12/3/82	1	729.00
Marguerite Romero		7/10/81	7/31/81	1	36.00
Gloria Jean Rose		3/27/81	5/8/81	1	116.15
Lynette Yvonne Ross		6/10/83	12/9/83	1	2275.33
Margaret Roth		6/26/81	9/11/81	1	365.00
Ann Rothman		12/5/80	3/20/81	1	2126.03
Ellen Roucoulet		1/9/81	6/17/83	1	212.50
Laurent Rousseau		9/16/83	12/9/83	1	806.71
Delores Rubin		2/5/82	3/23/84	1	17455.62
Jeffrey A. Rucker		7/16/82	1/28/83	1	1088.61
Sandra Rucker		6/25/82	6/25/82	1	33.00
Paul Rudolph		1/1/82	1/14/83	1	796.49
Linda D. Ruff*		5/21/82	4/27/84	1	1230.53
Joseph D. Salena		4/2/82	8/20/82	1	56.00
Paul Sam		12/17/82	12/24/82	1	29.19
Beverly J. Samuels		1/23/83	10/18/85	1	8143.21
Sharon Samuel		11/20/81	12/4/81	1	59.00
Bonnie Sanchez		8/13/82	9/10/82	1	49.13
Ramonita Sanchez		2/12/82	3/23/84	1	7301.26
Vivian Sahagian		2/6/81	3/20/81	1	46.23

Name and address of establishment

Page 31 of 39 Pages

TOTAL

Superior Care, Inc.
287 Northern Blvd.
Great Neck, NY 11021

*Column 4-Code
FLSA 1
PCA 2
SCA 3
DBRA 4
CWHSSA 5
CCPA 7

U.S. DEPARTMENT OF LABOR
 EMPLOYMENT STANDARDS ADMINISTRATION
 WAGE AND HOUR DIVISION
 535 Stewart Avenue, Room 714
 Garden City, New York 11530
 516 227-3100

SUMMARY OF UNPAID WAGES

PAYMENT TO BE COMPLETED AND ORIGINAL COPY
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 BY _____

COMPLIANCE OFFICER DATE
 Richard Mormile 2/13/86

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Nancita Santos		1/15/82	6/26/83	1	258.97
Catherine Saunders		10/30/81	7/8/83	1	1301.58
Margaret Scales		9/25/81	12/25/81	1	626.69
Edwina Scantlebury		12/31/82	3/4/83	1	75.84
Deborah Scarbrough		5/27/83	5/27/83	1	34.33
Gail Scheer		12/5/80	3/20/81	1	228.75
Ann Schivabenbauer		5/10/85	5/10/85	1	50.34
Gary P. Schmidt		9/25/81	12/3/82	1	252.16
Helen R. Schnitman		12/11/81	1/8/82	1	195.75
Kathy Schoepflin		1/8/82	1/8/82	1	72.00
Willie Bell Scott		12/11/81	7/8/83	1	2425.03
Janet Scruggs		6/29/84	6/29/84	1	69.20
Katherine Sedlik		1/2/82	2/2/82	1	94.30
Adelletta Seous		5/13/83	5/13/83	1	19.39
Edith M. Sewell		8/6/82	3/11/83	1	255.65
Joann Shalishauhani		1/14/82	1/28/83	1	42.26
Shalurzad Skidja		11/4/83	12/16/83	1	163.25
Shilling, Zita		1/2/81	1/2/81	1	106.36
Bonita Shearer		1/2/81	2/20/81	1	700.62
Juniar Simon		11/25/83	11/25/83	1	12.01

Name and address of establishment:

Page 32 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

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Linda Singleton		4/29/83	4/29/83	1	304.82
V. Sivenson		6/10/83	7/22/83	1	74.79
Stephen Sizemore		12/4/81	8/19/83	1	491.46
Peggy Slater		12/31/82	12/31/82	1	28.12
Christine Sliwa		9/17/82	12/10/82	1	131.25
Betty L. Sloan		3/26/82	8/13/82	1	200.07
Pat Slovensky		8/28/81	12/11/81	1	208.01
Robertta F. Smallwood		6/24/83	9/30/83	1	89.75
Aletha L. Smith		1/29/82	4/16/82	1	339.50
Barbara Smith		6/26/81	6/26/81	1	78.09
Christine Smith		9/23/83	9/23/83	1	120.00
Cynthia Smith		3/6/81	7/31/81	1	10.50
Evelyn Smith		1/1/81	11/9/84	1	10791.43
Mary Smith		3/26/82	12/24/82	1	159.80
Maxine Smith		1/2/81	5/29/81	1	326.34
Janet Snape		6/26/81	7/24/81	1	24.00
Carolyn S. Snider		11/5/82	12/24/82	1	309.23
Vilma Soares		2/19/82	4/23/82	1	113.33
Maura Soehnlein		10/29/82	12/17/82	1	16.15
Nancy Sosko		3/12/82	6/11/82	1	123.90

Name and address or establishment

Page 33 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

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Juanita Soterom		6/12/81	9/18/81	1	99.00
Madeline Souter		1/8/82	1/20/84	1	7675.50
Faye B. Spires		1/1/82	7/29/83	1	191.27
Karene M. Spivey		3/18/83	4/8/83	1	156.00
Linda D. Sprouse		5/14/82	10/22/82	1	270.95
Judy Stenic		2/20/81	4/3/81	1	61.94
Maude M. Steven		1/22/82	12/24/82	1	359.45
Florence Stewart		12/28/84	12/28/84	1	23.56
Grace Stewart		5/15/81	9/23/82	1	5027.70
Maud B. Stevens		10/2/81	12/18/81	1	286.37
Barbara Stevenson		8/17/84	11/5/84	1	304.50
Elsie Stiff		9/24/82	11/4/83	1	1932.48
Gloria Stovalls		4/16/82	5/18/84	1	5485.20
Constance Stow		4/3/81	1/8/82	1	1509.01
Lorene Stracener		3/27/81	5/22/81	1	60.62
Gloria Strachan		5/22/81	8/28/81	1	368.10
Marilyn Strickland		10/30/81	6/18/82	1	507.33
Peggy Stroker		4/29/83	9/2/83	1	269.00
Sara Swango		6/17/83	7/29/83	1	154.88
Maye Swartz		8/20/82	3/25/83	1	564.93

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Page 34 of 39 Pages

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Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

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 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

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Mary Swleney		12/4/81	12/25/81	1	43.35
Rachael F. Swico		12/5/80	7/24/81	1	200.00
Pat Swindle		6/4/82	8/6/82	1	150.00
Leslie Szasz		7/22/83	12/31/83	1	263.20
Linda Tarvin		12/25/81	12/25/81	1	55.00
Cora Taylor		3/26/82	12/31/82	1	448.12
John H. Taylor		7/17/81	9/24/82	1	1417.98
Linda Taylor		3/27/81	2/4/83	1	238.21
Susan G. Taylor		8/27/82	1/7/83	1	184.99
G. Lelaidier		8/19/83	8/19/83	1	130.00
Daisy W. Telfer		9/3/82	10/8/82	1	374.00
Jacquelyn Tennell		12/5/80	3/20/81	1	44.00
Katina Tew		5/13/83	6/10/83	1	115.16
Johnny Thayil		8/26/83	7/19/85	1	5604.80
Agnes Thomas		5/4/84	7/20/84	1	666.19
Cybil Thomas		3/18/83	4/8/83	1	229.50
Etna Thomas		5/11/84	7/6/84	1	660.00
Jean M. Thomas		5/10/85	11/15/85	1	1979.75
Sasonuna Thomas		1/6/84	8/17/84	1	971.25
Tammi Thomas		4/29/83	6/8/84	1	1791.75

Name and address of establishment Page 35 of 39 Pages

TOTAL

Superior Care, Inc.
 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

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Emma Thompson		3/18/83	3/18/83	1	44.00
Susan Thompson		7/2/82	11/26/82	1	276.55
Louvenia Thurston		5/14/82	9/17/82	1	198.22
Jean Tidwell		11/5/82	12/17/82	1	90.00
Wanda Timm		5/6/83	8/12/83	1	31.71
Gracie Tomlinson		3/9/84	6/8/84	1	804.74
Annie Mae Trammel		3/5/82	1/14/83	1	332.72
Brenda Sue Traver		7/10/81	8/28/81	1	152.00
Linda D. Truett	37	5/22/81	6/19/81	1	89.07
Karlene Tucker		6/11/82	12/10/82	1	427.28
Edith Turner		12/5/80	3/20/81	1	936.54
Valdene Turner		9/25/81	3/18/81	1	212.61
Nerci Urban		12/5/80	11/11/83	1	323.48
Eufracia Urena		1/22/82	2/26/82	1	236.17
Ofelia Valdes		11/27/81	9/9/83	1	3690.28
Jan Valdez		10/15/82	1/14/83	1	65.65
Maria Van Deusen		12/5/80	11/20/81	1	890.49
Arthur L. Varady		11/20/81	12/25/81	1	323.02
Edna Vaughn		12/5/80	12/31/83	1	2056.26
Elaine Vaughan		12/5/80	6/10/83	1	4469.77

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Page 36 of 39 Pages

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 287 Northern Blvd.
 Great Neck, NY 11021

*Column 4-Code
 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

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Linda Vaughn		10-30-81	10-4-85	1	2893.04
Vonita Vaughn		3-27-81	5-1-81	1	45.00
Zoe Vaughn		3-18-83	3-18-83	1	93.10
Edna Vidad		9-2-83	12-2-83	1	149.97
Luvenia Vincent		12-5-80	5-15-81	1	145.75
Elaine Vinson		1-2-81	6-19-81	1	110.01
Alourdes Voltaire		3-26-82	11-18-83	1	283.63
Sandra Vuletech		7-15-83	8-15-83	1	243.62
Louise Walker		12-5-80	12-24-82	1	3665.00
Gwendiline Walker		11-2-84	11-16-84	1	40.18
Deborah Walle		8-26-83	9-9-83	1	455.00
Barbara Walters		4-30-82	6-11-82	1	128.63
Gail Wanda		1-1-82	3-12-82	1	451.24
Doris Warden		1-8-82	5-14-82	1	413.94
Elaine Warren		5-27-83	11-5-83	1	462.24
Elizabeth Warren		1-2-81	1-9-81	1	55.63
Zona Watkins		10-7-83	10-7-83	1	130.00
Mary Watson	*	3-12-82	8-19-83	1	677.13
Patricia Watson		9-11-81	9-18-81	1	18.02
Sylvia Webb		1-9-81	9-18-81	1	153.93

Name and address of establishment:

Page 37 of 39 Pages

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 Great Neck, NY 11021

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 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
 CCPA 7

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Priscilla Webster		1/1/82	10/1/82	1	1070.50
Andrea Weigand		7/10/81	11/27/81	1	1002.00
Roberta Weiss		9/25/81	11/6/81	1	216.00
Maude Wellington		11/20/81	12/25/81	1	64.58
Mildred Wendel		3/6/81	3/13/81	1	36.00
Deborah West		2/12/82	8/6/82	1	752.75
Carolyn Wetmore		1/2/81	8/20/82	1	138.90
Diane Wheat		1/21/83	2/25/83	1	315.00
Karen Wikenning		1/28/83	2/18/83	1	160.00
Ivy Whiteman		3/6/81	7/31/81	1	1199.00
Lorenzo Wilcher		2/11/83	3/4/83	1	97.14
Daniel Wilkenson		7/2/82	12/31/82	1	444.26
Alfretta Wilkey		9/25/81	3/19/82	1	130.55
Doris A. Williams		6/18/82	6/25/82	1	119.00
Jessie Williams		4/25/81	9/18/81	1	372.00
Karen Williams		12/5/80	9/2/83	1	1995.04
Laura Williams		5/18/84	5/18/84	1	108.00
Loretta Williams		11/27/81	12/25/81	1	96.00
Madge Williams		3/12/82	3/12/82	1	126.00
Marjorie Williams		7/8/83	9/23/83	1	96.39

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Page 38 of 39 Pages

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 287 Northern Blvd.
 Great Neck, NY 11021

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 FLSA 1
 PCA 2
 SCA 3
 DBRA 4
 CWHSSA 5
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Pauline Williams		8/19/83	8/19/83	1	90.81
Rhonda Williams		12/11/81	12/25/81	1	35.00
Wanda Wanda Williams		8/6/82	6/3/83	1	1055.06
Dorothy Wilson		7/30/82	11/12/82	1	151.59
Eva Wilson		12/5/80	3/20/81	1	759.33
Jennifer Wilson		8/27/82	9/3/82	1	65.07
Robbie Wilson		12/5/80	5/29/81	1	96.38
Irma Wimberly		4/9/82	12/23/83	1	3010.34
Susan Winnie		1/8/82	10/29/82	1	193.12
Tina Wise		2/19/82	12/17/82	1	169.00
Nancy Wollner		3/26/82	4/2/82	1	40.00
John B. Woodjin		6/14/85	11/15/85	1	146.06
Bernice Woodruff		6/5/81	7/24/81	1	63.43
Hortense Wren		9/11/81	9/25/81	1	104.50
Carolyn Yates		3/19/82	9/24/82	1	264.25
Sandra B. Yates Sandra B. Yates		3/11/83	4/29/83	1	241.21

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TOTAL \$655,735.57

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