

wage, breached their contract with Plaintiffs, and broke the promises they made to Plaintiffs.

2. Defendant Advance Services, through its employees Jorge Salinas and Lynne Wagner, recruited Plaintiffs at Plaintiff Juan Luis Caudillo's home in Texas. While recruiting Plaintiffs, Defendant Advance Services, acting as the agent of Defendants Corteva and Pioneer, made promises regarding the amount of work, the wages, and the benefits Plaintiffs would receive. Defendants made these promises, which they would later break, without providing required written disclosures, thereby harming Plaintiffs and violating the AWPA.
3. Defendants made these promises expecting Plaintiffs to rely on them to travel to Georgia to work for Defendants.
4. Reasonably relying on these promises, Plaintiffs traveled from their homes in Texas to Georgia.
5. Plaintiffs spent a significant amount of money to travel across four states with their entire families, including young children.
6. Ultimately, Defendants offered Plaintiffs fewer hours of work per week than promised and, despite having promised months of work, fired Plaintiffs after only a few weeks.

II. JURISDICTION AND VENUE

7. This Court has jurisdiction over Plaintiffs' claims under the AWPA and the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 201 *et seq.*, pursuant to 28 U.S.C. § 1331 (federal question jurisdiction).
8. Plaintiffs' federal claims are authorized and instituted pursuant to 29 U.S.C. § 1854(a) (AWPA) and 29 U.S.C. § 216(b) (FLSA).

9. The Court has the power to grant declaratory relief pursuant to 28 U.S.C. §§ 2201-2202.
10. This Court has supplemental jurisdiction over Plaintiffs' state law claims under 28 U.S.C. § 1367 because these claims are so related to Plaintiffs' federal claims that they form part of the same controversy.
11. Defendant Advance Services is registered to do business in Georgia, contracted with Defendant Pioneer to provide workers for Defendants Corteva and Pioneer's Georgia operations, and recruited Plaintiffs from Texas to work in Georgia. Accordingly, Defendant Advance Services has sufficient contacts within the Middle District of Georgia such that this Court has personal jurisdiction over it and maintenance of this suit in this Court does not offend traditional notions of fair play and substantial justice.
12. Defendant Corteva is registered as a foreign corporation to do business in Georgia, has offices in Georgia, operates agricultural facilities in Pelham and Cairo, Georgia, and employed Plaintiffs in Georgia.
13. Accordingly, Defendant Corteva has sufficient contacts within the Middle District of Georgia such that this Court has personal jurisdiction over it and maintenance of this suit in this Court does not offend traditional notions of fair play and substantial justice.
14. Defendant Pioneer is registered as a foreign corporation to do business in Georgia and operates facilities in Pelham and Cairo, Georgia, and employed Plaintiffs in Georgia.
15. Accordingly, Defendant Pioneer has sufficient contacts within the Middle District of Georgia such that this Court has personal jurisdiction over it and maintenance of this suit in this Court does not offend traditional notions of fair play and substantial justice.
16. A substantial part of the acts and omissions giving rise to Plaintiffs' claims occurred in or around Grady County and, on information and belief, Mitchell County, Georgia, and

venue is proper in this District and Division pursuant to 28 U.S.C. § 1391(b)(2) and 29 U.S.C. § 1854(a).

III. PARTIES

A. Plaintiffs

17. Plaintiffs are 13 migrant agricultural workers from Hidalgo County, Texas.
18. Carlos Alberto Caudillo is the father of Alexis Alejandro Caudillo., C.A.C.J., K.C., Cinthia Caudillo Piña, and Carla Caudillo. They are residents of Edinburg, Texas.
19. Juan Luis Caudillo and Maria Elva Caudillo are the parents of Jose Rolando Caudillo, Angel Adelardo Caudillo, and Osmara Yoselyn Caudillo. They are residents of Mission, Texas.
20. When the acts and omissions complained of herein took place in 2019, Jose Rolando Caudillo, Osmara Yoselyn Caudillo, and Angel Adelardo Caudillo were minors.
21. Carlos Alberto Caudillo, Juan Luis Caudillo, Maria Elva Caudillo, Francisco J. Mendoza, Sr., and Roberto Castro Sanchez primarily speak, read, and write Spanish.
22. Roberto Castro Sanchez is a resident of Mission, Texas.
23. Francisco J. Mendoza Sr. is a resident of Hidalgo, Texas.
24. In 2019, Plaintiffs were engaged in “agricultural employment” for Defendants within the meaning of 29 U.S.C. § 1802(3) because they worked on a farm in the cultivation of corn, an agricultural commodity.
25. In 2019, Plaintiffs were “migrant agricultural workers” within the meaning of 29 U.S.C. § 1802(8)(A) because they were employed in temporary and seasonal agricultural employment in Georgia and were therefore required to be absent from their permanent places of residence in Texas overnight.

26. At all relevant times, Plaintiffs were employed by Defendants within the meaning of 29 U.S.C. §§ 203(e) & 203(g) because Defendants suffered or permitted Plaintiffs to work.

B. Defendants

27. Defendant Advance Services is a Nebraska corporation registered to do business in Texas and Georgia with offices throughout the United States, including, in 2019, an office in McAllen, Texas, from which Plaintiffs' recruitment was conducted.

28. As further alleged below, Defendant Advance Services in 2019 was in the business of recruiting, hiring, employing, furnishing, and transporting migrant agricultural workers, including Plaintiffs, making it a farm labor contractor within the meaning of 29 U.S.C. § 1802(7).

29. In 2019, Defendant Advance Services was registered as a farm labor contractor with the U.S. Department of Labor as required by the AWPA.

30. In 2019, Defendant Advance Services was an enterprise engaged in commerce or the production of goods for commerce within the meaning of 29 U.S.C. § 203(s) because it employed Plaintiffs to handle goods and materials, including corn, that traveled in interstate commerce and because Defendant Advance Services had, on information and belief, annual gross sales or business done of at least \$500,000.

31. Defendant Pioneer hired and paid Defendant Advance Services to recruit, hire and provide workers to perform agricultural labor in Georgia. As a result, Defendant Advance Services recruited, hired and provided the Plaintiffs to Defendant Pioneer to work in Georgia.

32. Defendant Advance Services was Plaintiffs' employer in 2019 within the meaning of 29 U.S.C. § 1802(5) and 29 U.S.C. § 203(d) because it acted in the interest of Corteva and

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