UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CASE NO:

WENCONG JIANG, on behalf of himself and all similarly situated individuals,

Plaintiff(s),

v.

ZKTECO USA LLC, a New Jersey limited liability company, d/b/a NGTeco, and GOFO, INC., a New York corporation,

Defendants.
_____/

CLASS ACTION COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

Plaintiff, WENCONG JIANG ("Plaintiff"), by and through undersigned counsel, files this Class Action Complaint for Damages and Demand for Jury Trial against Defendants, ZKTECO USA LLC d/b/a NGTeco ("NGT"), and GOFO, INC. ("GOFO"), and alleges as follows:

INTRODUCTION

1. Plaintiff brings this class action for damages and other legal and equitable remedy resulting from the illegal actions of Defendants in collecting, obtaining, storing and/or using Plaintiff's, and other similarly situated individuals' biometric identifiers and biometric information (referred to collectively as "biometrics") without informed written consent in violation of the Illinois Biometric Information Privacy Act ("BIPA").

2. The Illinois Legislature has determined that "[b]iometrics are unlike any other unique identifiers that are used to access finances or other sensitive information." 740 ILCS § 14/5I. "For example, social security numbers, when compromised, can be changed. Biometrics,

however, are biologically unique to the individual; therefore, once compromised, the individual has no recourse, is at heightened risk for identity theft, and is likely to withdraw from biometric-facilitated transactions." *Id.* In recognition of these concerns over the security of individuals' biometrics, the Illinois Legislature enacted BIPA.

3. "Biometrics" refers to technologies used to identify an individual based on unique physical characteristics. Common biometric identifiers include fingerprints, hand or face geometric scans, retina or iris scans, or voice scans, which are all generally obtained by first acquiring an image or photograph of the biometric identifier.

4. Unlike other identifiers like Social Security or credit card numbers, which can be changed if compromised or stolen, biometric identifiers linked to a specific finger or hand cannot. These unique and permanent biometric identifiers, once exposed, leave victims with no means to prevent identify theft and unauthorized tracking.

5. As expressed herein, BIPA is the result of an expressed fundamental public policy and legislative intent in Illinois to regulate the collection of biometric information. BIPA provides, inter alia, that private entities like Defendant may not collect, capture, purchase, receive through trade, or otherwise obtain an individual's biometrics unless it: (1) informs that person in writing that biometric identifiers or information will be collected or stored; (2) informs that person in writing of the specific purpose and length of term for which such biometric identifiers or biometric information is being collected, stored and used; (3) receives a written release from the person for the collection of his or her biometric identifiers or information; and (4) publishes publicly available written retention schedules and guidelines for permanently destroying biometric identifiers and biometric information, *see* 740 ILCS § 14/15(a) and (b).

6. BIPA further states that "[n]o private entity in possession of a biometric identifier or biometric information may sell, lease, trade, or otherwise profit from a person's or a customer's biometric identifier or biometric information." 740 ILCS § 14/15(c).

7. Moreover, BIPA states that "[n]o private entity in possession of a biometric identifier or biometric information may disclose, redisclose, or otherwise disseminate a person's or a customer's biometric identifier or biometric information unless… the subject of the biometric identifier or biometric information or the subject's legally authorized representative consents to the disclosure or redisclosure." 740 ILCS § 14/15(d)(1).

8. In direct violation of the foregoing provisions of Section 15(a) of BIPA, Defendant, GOFO, failed to provide, publish, or otherwise make publicly available data retention policies.

9. In direct violation of the foregoing provisions of Section 15(b) of BIPA, Defendants GOFO, and NGT, actively collected, stored, obtained, and used the biometrics of Illinois residents, including Plaintiff, without providing notice, or obtaining informed written consent.

10. In direct violation of the foregoing provisions of Section 15(c) of BIPA, Defendant, NGT, actively sold, leased, traded, or otherwise profited from the biometrics of Illinois residents, including Plaintiff.

11. In direct violation of the foregoing provisions of Section 15(d) of BIPA, Defendant, NGT, actively disclosed, redisclosed, or otherwise disseminated the biometrics of Illinois residents, including Plaintiff, without providing notice, or obtaining informed written consent.

12. Specifically, during the relevant time period, Plaintiff and other similarly situated individuals in Illinois were required to scan their fingerprints on Defendant, NGT's biometric devices to keep track of the amount of time Plaintiffs were working for Defendant, NGT's customers in Illinois, including (but not limited to) Defendant, GOFO.

13. Plaintiff brings this action on behalf of herself and a class of similarly situated individuals to prevent Defendants from further violating privacy rights and to recover statutory damages for Defendants' unauthorized collection, storage and use of Plaintiff's biometrics in violation of BIPA.

PARTIES, JURISDICTION & VENUE

14. Plaintiff is and has been at all relevant times, a resident and citizen of the State of Illinois. Plaintiff was employed by Defendant, GOFO, who utilized Defendant, NGT's biometric timekeeping devices during multiple workweeks in 2024 and 2025, at Defendant, GOFO's warehouse facility in Franklin Park, Illinois. Plaintiff was required to use his biometrics associated with his fingerprint to clock-in to work within the five (5) year period prior to the filing of this Complaint. Plaintiff never consented, agreed or gave permission – written or otherwise – to either of these Defendants for the collection, storage, sale, lease, disclosure, redisclosure, or dissemination of the biometric identifiers or biometric information associated with his fingerprints. Further, these Defendants never provided Plaintiff, nor did he ever sign a written release allowing these Defendants to collect, store, disclose, redisclose, or otherwise disseminate the biometric identifiers or biometric information associated with his fingerprints.

15. Defendant, GOFO, is a New York corporation, and registered to do business in the State of Illinois, with its registered agent, Chuan Q. Zheng, located at 1055 Sesame Street, Franklin Park, Illinois 60131-1316. Defendant, GOFO, collected, obtained, and/or used the biometric information of Illinois residents at its place of business in Illinois and maintains such minimum contacts with Illinois to make this Court's exercise of jurisdiction proper. Defendant, GOFO, engages in continuous and systematic business operations or activities within Illinois and

maintained locations in the State, including within Franklin Park, Illinois, and Melrose Park, Illinois, within this judicial circuit.

16. Defendant, NGT, is a New Jersey limited liability company, with its registered agent, Manish Dalal, located at 1600 Union Hill Road, Alpharetta, Georgia 30005. Defendant, NGT, while a New Jersey limited liability company, engages in business in Illinois and operates with Illinois companies by collecting and storing Illinois residents' biometric information in its server and database, sends its biometric devices into the State of Illinois, and acknowledges its required compliance with BIPA. Defendant, NGT, owns, operates, and/or controls several biometric devices which it has delivered to the State of Illinois which collected the biometric information of thousands of individuals in the State of Illinois within the past 5 years. Defendant, NGT, engages in continuous and systematic business operations or activities within Illinois and publicly acknowledges that it is subject to the laws of Illinois, including BIPA.

17. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a) because there is complete diversity of citizenship between Plaintiff and Defendants and the amount in controversy exceeds $75,000.00.

18. This Court also has subject matter jurisdiction over this matter pursuant to the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1332(d)(2), because this is a class action in which the Defendants are citizens of states different than Plaintiff and the other class members, and because the amount in controversy exceeds $5,000,000.00.

19. No applicable statutory exception to jurisdiction exists.

20. Venue is proper in this Court because Defendant, GOFO, maintains its place of business within this County, transacts substantial business within this County, and the events giving rise to this lawsuit occurred in substantial part within this County.

21. Venue is proper in this Court because Defendant, NGT, engaged in substantial business within this judicial district, sent biometric devices into Franklin Park, Illinois, and elsewhere throughout the state, with the knowledge that they would be collecting biometric information from Illinois residents, and knew that the events giving rise to this lawsuit occurred in substantial part within this judicial district.

NGT BIOMETRIC DEVICES

22. Defendant, NGT, is a vendor of time and attendance solutions to employers and provides its Illinois-based clients with biometric timekeeping devices and services to perform workforce management services, such as timekeeping and work-scheduling services.

23. In 2018, Defendant, NGT, established its biometric brand to focus on developing biometric time clocks for the workplace. Defendant, NGT's technology captures the biometric identifiers of its clients' employees and transmits information and data derived from those biometric identifiers directly to Defendant, NGT's cloud-based time and attendance systems. This information that Defendant, NGT, receives and possesses is generated and derived from the scanning of Plaintiff's and other Class Members' biometric identifiers. Thus, Defendant, NGT, obtains, collects, and possesses biometric information.

24. In one of its publicly available online blogs dated October 10, 2025, Defendant, NGT, explained how its biometric time clocks work and claimed that its devices "identify dozens of unique points (minutiae) on a fingerprint and map the specific distances between them" and "[a]n algorithm converts these unique measurements into a secure, encrypted string of numbers." In its online blog, Defendant, NGT, refers to this encrypted string of numbers as "the biometric template." *See* *https://ngteco.com/blogs/news/are-biometric-time-clocks-*

secure?srsltid=AfmBOorJnJ4Ys9vL_zXDXNKRcwv2xdd4zUKdwjsQuHUWB4mbpigOS4O3.

(last visited October 21, 2025).

25. Defendant, NGT, also maintains a Privacy Policy on its website, which as of the date of this filing, states that its biometric devices **collect** biometric identifiers derived from its users' facial geometry and/or fingerprints.

26. Defendant, NGT's Privacy Policy further states that NGT **shares and/or sells** this biometric information to third-party payroll processors.

27. Defendant, NGT's Privacy Policy expressly acknowledges the Illinois Biometric Information Privacy Act and NGT purports to comply with same (but does not).

28. Notwithstanding *its own admitted collection* of biometric information from Illinois residents, Defendant, NGT, fails to obtain express written consent from users prior to obtaining, collecting and/or disseminating their biometric information and/or biometric identifiers.

29. Defendant, NGT, markets its biometric time clocks to employers in Illinois as superior options to traditional time clocks. By marketing its biometric time clocks in this manner, Defendant, NGT, obtains competitive advantage over other time clock companies and secures profits from its use of biometric data, all while failing to comply with the minimum requirements for handling employees' biometric data established by BIPA.

30. Defendant, NGT, advertises the biometric devices it sells and/or leases to Illinois businesses as being capable of storing up to 1,000 different fingerprints.

31. During the relevant time period, Defendant, NGT, sent multiple biometric devices into the State of Illinois with the knowledge that these devices would be capturing, obtaining, using, and/or collecting biometric information from Illinois residents.

32. When an employee first begins work at an Illinois company that uses one of Defendant, NGT's biometric devices, the employee is required to scan their fingerprint into the NGT biometric device in order to create a biometric template and enroll them in Defendant, NGT's database.

33. Defendant, NGT, then stores the template of the biometric information and/or identifiers of Illinois residents in its database so that Illinois employers can access the biometric information to use this information for payroll and attendance confirmation.

34. When an Illinois resident employed by a company in Illinois scans its biometric information into Defendant, NGT's biometric device, NGT becomes aware that it is in the possession of Illinois residents' biometric information.

GOFO REQUIRES PLAINTIFF TO USE NGT BIOMETRIC DEVICES

35. Defendant, GOFO, specializes in "last-mile delivery services across the United States" and strives to "meet the dynamic needs of e-commerce and local businesses by combining advanced technology with a customer-centric approach." *See* https://gofoexpress.com/about.html (last visited October 21, 2025).

36. Defendant, GOFO, operated during the relevant period in Illinois from a warehouse facility in Franklin Park and recently relocated to a warehouse facility in Melrose Park.

37. On December 2, 2024, Defendant, GOFO, hired Plaintiff to work as a warehouse head at its facility in Franklin Park, Illinois. Plaintiff's employment with Defendant, GOFO, ended on September 12, 2025.

38. During the 5 years preceding the filing of this lawsuit, Defendant, GOFO, employed hundreds of individuals, including Plaintiff, and required these individuals to scan their

fingerprints onto NGT biometric timekeeping devices to keep track of the amount of time these employees worked and to keep track of the identities of individuals present at the facilities.

39. During the 5 years preceding the filing of this lawsuit, Defendant, GOFO, also required hundreds of outside contractors, workers, and vendors who accessed the warehouse to scan their fingerprints onto NGT biometric timekeeping devices in order to keep track of the identities of individuals present at the facility and time and day on which these individuals accessed the facilities.

40. Defendant, GOFO, required Plaintiff and other employees, workers, and contractors to scan their fingerprints onto NGT Biometric Fingerprint Time Clocks (hereinafter "the Time Clocks").

41. Plaintiff and the GOFO Class were all individuals who were physically present at Defendant, GOFO's facilities in Franklin Park, Illinois, and Melrose Park, Illinois, during periods of time within the past five (5) years who were required to scan their fingers on the Time Clocks.

42. During periods of time within the past 5 years, Defendant, GOFO, received, maintained and installed ***at least*** 4 NGT Biometric Fingerprint Time Clocks due to the volume of individuals whose biometrics were obtained and collected by the Defendants.

43. Defendant, GOFO, owned and/or leased and operated the Time Clocks from Defendant, NGT.

44. The Time Clocks function by scanning and identifying unique points referenced on an individual's finger, and an algorithm converts these points into a mathematical template.

45. BIPA expressly includes within the definition of "biometric information" "any information based on a biometric identifier, regardless of how it is converted or stored," thereby encompassing mathematical templates derived from unique points on an individual's fingerprint.

46. As such, the NGT biometric Time Clocks, which derive a mathematical template from fingerprints, which are biometric identifiers, function by collecting, storing, and using biometrics.

47. During all times material hereto, both Defendants possessed ability to, and did, access, manipulate, and maintain information stored on or collected by the Time Clocks.

48. According to Defendant, NGT, the Time Clocks provide local storage on the device itself and cloud-based storage for the biometric information.

49. Defendants both stored all data from the Time Clocks, including the biometrics of Plaintiff and the Classes on their own servers and/or cloud storage systems and devices.

50. By storing biometrics on their own servers and/or cloud-storage systems and devices, Defendants jointly possessed Plaintiff's and the Class Members' biometrics.

51. The Time Clocks therefore require the collection and possession of biometric data points constituting the fingerprints of its users.

52. The act of scanning employees' and contractors' fingerprints, collecting biometric data points, and storing those biometrics in a device, facility, or server, exposes these individuals' sensitive personal data to privacy risks.

53. For example, if the Time Clocks, facility, servers, or cloud storage system become compromised through a data security breach, sensitive personal information based on the scans of these employees' fingerprints could be used to steal their identities or to track them.

54. Defendants never informed Plaintiff of the specific purpose and length of time for which their biometric identifiers or information would be collected, stored and used, nor did Defendants obtain a written consent or release from Plaintiff for the collection, storage,

dissemination or use of the biometric identifiers or biometric information associated with his fingerprint.

55. In violation of Section 15(a) of BIPA, Defendant, GOFO, did not have written, publicly available policies identifying their retention schedules or guidelines for permanently destroying users' biometric identifiers or information.

56. In violation of Section 15(b) of BIPA, Defendants, GOFO and NGT, never provided Plaintiff nor did Plaintiff ever sign, a written release allowing Defendants to collect, store, or use the biometrics associated with his fingerprint.

57. In violation of Section 15(c) of BIPA, Defendant, NGT, sold, leased, traded, or otherwise profited from Plaintiff's biometrics.

58. In violation of Section 15(d) of BIPA, Defendant, NGT, disclosed, redisclosed, or otherwise disseminated Plaintiff's biometrics without providing notice or obtaining consent.

59. Defendants' actions violate the Plaintiff's statutory privacy rights under BIPA.

60. Defendant, GOFO, did not have written, publicly available policies identifying its retention schedules or guidelines for permanently destroying users' biometric identifiers or information prior to collecting the information.

61. Plaintiff has been required to retain the undersigned counsel to protect and enforce his rights under BIPA and is therefore entitled to recover reasonable attorney's fees and costs.

CLASS ALLEGATIONS

62. Class Definitions: Plaintiff brings this action pursuant to Fed. R. Civ. P. 23 on behalf of two (2) classes of similarly situated individuals, defined below:

> **GOFO Class: All individuals who resided in Illinois within the past 5 years who had their biometric identifiers, including "fingerprints" collected, capture, received, used or otherwise obtained by Defendant, GOFO, in the State of Illinois.**

> **NGT Class: All individuals who resided in Illinois within the past 5 years who had their biometric identifiers, including "fingerprints" collected, captured, received, used, or otherwise obtained by Defendant, NGT, in the State of Illinois on an NGT biometric device.**

63. The following are excluded from the Classes: (1) any Judge presiding over this action and members of his or her family; (2) persons who properly executed and file a timely request for exclusion from the Classes; (3) persons whose claims in this matter have been finally adjudicated on the merits or otherwise released; (4) Plaintiff's counsel and Defendant's counsel; and (6) legal representatives, successors, and assigns of any such excluded persons.

64. **Numerosity**: The number of persons within each Class is substantial and is believed to amount to hundreds of people. It is, therefore, impractical to join each member of the Classes as a named Plaintiff. Further, the size and relatively modest value of the claims of the individual members of the Classes renders joinder impractical. Accordingly, utilization of the class action mechanism is the most economically feasible means of determining and adjudicating the merits of this litigation.

65. **Commonality and Predominance**: There are well-defined common questions of facts and law that exist as to all members of the Classes and that predominate over any questions affecting only individual members of the Classes. These common legal and factual questions, which do not vary from Class member to Class member, and which may be determined without reference to the individual circumstances of any class member include, but are not limited to, the following:

(a) whether Defendants collected or otherwise obtained Plaintiff's and the Classes' biometric identifiers or biometric information;

(b) whether Defendants properly informed Plaintiff and the Classes that it collected, used, and stored their biometric identifiers or biometric information;

(c) whether Defendants obtained a written release (as defined in 740 ILCS § 14/10) to collect, use, and store Plaintiff's and the Classes' biometric identifiers or biometric information;

(d) whether Defendant, GOFO, developed a written policy, made available to the public, establishing a retention schedule and guidelines for permanently destroying biometric identifiers and biometrics information when the initial purpose for collecting or obtaining such identifiers or information has been satisfied or within 3 years of their last interaction, whichever occurs first;

(e) whether Defendants used Plaintiffs' and the Class's biometric identifiers or biometric information to identify them; and

(f) whether Defendants' violations of the BIPA were committed intentionally, reckless, or negligently.

66. **Adequate Representation**: Plaintiff has retained and is represented by qualified and competent counsel who are highly experienced in complex employment and privacy class action litigation. Plaintiffs and their counsel are committed to vigorously prosecuting this class action and have previously been named class counsel in other BIPA class actions. Neither Plaintiff nor his counsel have any interest adverse to, or in conflict with, the interests of the absent members of the Classes. Plaintiff is able to fairly and adequately represent and protect the interests of such Classes. Plaintiff has raised viable statutory claims of the type reasonably expected to be raised by members of the Classes, and will vigorously pursue those claims. If necessary, Plaintiff may seek leave of this Court to amend this Class Action Complaint to include additional Class representatives to represent the Classes or additional claims as may be appropriate.

67. **Superiority:** A class action is superior to other available methods for the fair and efficient adjudication of this controversy because individual litigation of the claims of all Class members is impracticable. Even if every member of the Classes could afford to pursue individual litigation, the Court system could not. It would be unduly burdensome to the courts in which individual litigation of numerous cases would proceed. Individualized litigation would also present the potential for varying, inconsistent or contradictory judgments, and would magnify the delay and expense to all parties and to the court system resulting from multiple trials of the same factual issues. By contrast, the maintenance of this action as a class action, with respect to some or all of the issues presented herein, presents few management difficulties, conserves the resources of the parties and of the court system and protects the rights of each member of the Classes. Plaintiffs anticipate no difficulty in the management of his action as a class action. Class wide relief is essential to compel compliance with the BIPA.

COUNT I – VIOLATION OF 740 ILCS 14/15(a) FOR FAILURE TO INSTITUTE, MAINTAIN, AND ADHERE TO PUBLICLY AVAILABLE RETENTION SCHEDULE
(On Behalf of Plaintiff and the GOFO Class)

68. Plaintiff hereby incorporates the allegations within paragraphs 1-67 as though fully set forth herein.

69. Defendant, GOFO, is a New York corporation that is registered to do business and engages in business in Illinois, and thus qualifies as a "private entity" under BIPA. *See* 740 ILCS § 14/10.

70. BIPA mandates that companies in possession of biometric data establish and maintain a satisfactory biometric data retention – and, importantly, deletion – policy. Specifically, those companies must: (i) make publicly available a written policy establishing a retention schedule and guidelines for permanent deletion of biometric data (at most three years after the

company's last interaction with the individual); and (ii) actually adhere to that retention schedule and actually delete the biometric information. *See* 740 ILCS § 14/15(a).

71. As a private entity covered under BIPA, Defendant, GOFO, failed and continues to fail to comply with these BIPA mandates.

72. Plaintiff and members of the putative class are individuals who had their "biometric identifiers" collected by Defendant, as explained in detail above. *See* 740 ILCS § 14/10.

73. Plaintiff's and putative class members' biometric identifiers were used to identify Plaintiffs and, therefore, constitute "biometric information" as defined by BIPA. *See* ILCS § 14/10.

74. Defendant, GOFO, failed to provide a publicly available retention schedule or guidelines for permanently destroying biometric identifiers and biometric information as specified by BIPA. *See* 740 ILCS § 14/15(a).

75. Defendant, GOFO, likewise failed to comply or adhere to any such retention schedule or otherwise delete the biometric information it collected as required under BIPA.

76. Defendant, GOFO, lacks retention schedules and guidelines for permanently destroying Plaintiffs' and the GOFO Class's biometric data and have not and will not destroy Plaintiffs' and the GOFO Class's biometric data when the initial purpose for collecting or obtaining such data has been satisfied or within three years of the individual's last interaction with the company.

77. On information and belief, Defendant, NGT, advised Defendant, GOFO, of its obligation to comply with BIPA but Defendant, GOFO, nevertheless failed to comply with its requirements and therefore committed intentional violations of the law.

78. On behalf of himself and the GOFO Class, Plaintiff seeks: (1) declaratory relief; (2) injunctive relief and equitable relief as is necessary to protect the interests of Plaintiff and the

GOFO Class by requiring Defendant, GOFO, to comply BIPA's requirements for the collection, storage, and use of biometric identifiers and biometric information as described herein; (3) statutory damages of $5,000 for each intentional and/or reckless violation of BIPA pursuant to 740 ILCS § 14/20(2), or, in the alternative, statutory damages of $1,000 for each negligent violation of BIPA pursuant to 740 ILCS § 14/20(1); and (4) reasonable attorney's fees and costs and other litigation expenses pursuant to 740 ILCS § 14/20(3).

COUNT II – VIOLATION OF 740 ILCS 14/15(b) FOR FAILURE TO OBTAIN INFORMED WRITTEN CONSENT AND RELEASE BEFORE OBTAINING BIOMETRIC IDENTIFIERS OR INFORMATION
(On Behalf of Plaintiff and the GOFO Class)

79. Plaintiff incorporates the allegations within paragraphs 1-67 as though fully set forth herein

80. Defendant, GOFO, is a New York corporation that is registered to do business and engages in business in Illinois and thus qualifies as a "private entity" under BIPA. *See* 740 ILCS § 14/10.

81. BIPA requires companies to obtain informed written consent from employees before acquiring their biometric data. Specifically, BIPA makes it unlawful for any private entity to "collect, capture, purchase, receive through trade, or otherwise obtain a person's or a customer's biometric identifiers or biometric information unless [the entity] first: (1) informs the subject… in writing that a biometric identifier or biometric information is being collected or stored; (2) informs the subject… in writing of the specific purpose and length of term for which a biometric identifier or biometric information is being collected, stored, and used; and (3) receives a written release executed by the subject of the biometric identifier or biometric information…" *See* 740 ILCS § 14/15(b).

82. Defendant, GOFO, failed and still fails to comply with these BIPA mandates.

83. Plaintiff and members of the putative class are individuals who have had their "biometric identifiers" collected by Defendant, GOFO, as explained in detail above. *See* 740 ILCS § 14/10.

84. Plaintiff's and the Class's biometric identifiers were used to identify them and, therefore, constitutes "biometric information" as defined by BIPA. *See* 740 ILCS § 14/10.

85. Defendant, GOFO, systematically and automatically collected, used, stored, and disseminated Plaintiff's and the GOFO Class's biometric identifiers and/or biometric information without first obtaining the written release required by 740 ILCS § 14/15(b)(3).

86. Defendant, GOFO, never informed Plaintiff and the GOFO Class in writing that their biometric identifiers and/or biometric information were being collected, stored, used and disseminated, nor did Defendant, GOFO, inform Plaintiff and the GOFO Class in writing of the specific purpose(s) and length of term for which their biometric identifiers and/or biometric information were being collected, stored, used, and disseminated as required by 740 ILCS § 14/15(b)(1)-(2).

87. By collecting, storing, using and disseminating Plaintiff's and the GOFO Class' biometric identifiers and biometric information as described herein, Defendant, GOFO, violated Plaintiff's and the GOFO Class's rights to privacy in their biometric identifiers and/or biometric information as set forth in BIPA. *See* 740 ILCS § 14/1, et. seq.

88. On information and belief, Defendant, NGT, advised Defendant, GOFO, of its obligation to comply with BIPA but Defendant, GOFO, nevertheless failed to comply with its requirements and therefore committed intentional violations of the law.

89. On behalf of themselves and the GOFO Class, Plaintiffs seek: (1) declaratory relief; (2) injunctive relief and equitable relief as is necessary to protect the interests of Plaintiff and the

GOFO Class by requiring Defendant, GOFO, to comply with BIPA's requirements for the collection, storage, use and dissemination of biometric identifiers and biometric information as described herein; (3) statutory damages of $5,000 for each intentional and/or reckless violation of BIPA pursuant to 740 ILCS § 14/20(2), or, in the alternative, statutory damages of $1,000 for each negligent violation of BIPA pursuant to 740 ILCS § 14/20(1); and (4) reasonable attorney's fees and costs and other litigation expenses pursuant to 740 ILCS § 14/20(3).

COUNT III – VIOLATION OF 740 ILCS 14/15(b) FOR FAILURE TO OBTAIN INFORMED WRITTEN CONSENT AND RELEASE BEFORE OBTAINING BIOMETRIC IDENTIFIERS OR INFORMATION
(On Behalf of Plaintiff and the NGT Class)

90. Plaintiff incorporates the allegations within paragraphs 1-67 as though fully set forth herein

91. Defendant, NGT, is a New Jersey limited liability company that engages in regular business in Illinois and sends its biometric devices into Illinois to collect biometric information from Illinois residents, and thus qualifies as a "private entity" under BIPA. *See* 740 ILCS § 14/10.

92. BIPA requires companies to obtain informed written consent from employees before acquiring their biometric data. Specifically, BIPA makes it unlawful for any private entity to "collect, capture, purchase, receive through trade, or otherwise obtain a person's or a customer's biometric identifiers or biometric information unless [the entity] first: (1) informs the subject… in writing that a biometric identifier or biometric information is being collected or stored; (2) informs the subject… in writing of the specific purpose and length of term for which a biometric identifier or biometric information is being collected, stored, and used; and (3) receives a written release executed by the subject of the biometric identifier or biometric information…" *See* 740 ILCS § 14/15(b).

93. Defendant, NGT, failed and still fails to comply with these BIPA mandates.

94. Plaintiff and members of the NGT Class are individuals who have had their "biometric identifiers" collected by Defendant, NGT, as explained in detail above. *See* 740 ILCS § 14/10.

95. Plaintiff's and the NGT Class's biometric identifiers were used to identify them and, therefore, constitutes "biometric information" as defined by BIPA. *See* 740 ILCS § 14/10.

96. Defendant, NGT, systematically and automatically collected, used, stored, and disseminated Plaintiff's and the NGT Class's biometric identifiers and/or biometric information without first obtaining the written release required by 740 ILCS § 14/15(b)(3).

97. Defendant, NGT, never informed Plaintiff and the NGT Class in writing that their biometric identifiers and/or biometric information were being collected, stored, used and disseminated, nor did Defendant, NGT, inform Plaintiff and the NGT Class in writing of the specific purpose(s) and length of term for which their biometric identifiers and/or biometric information were being collected, stored, used, and disseminated as required by 740 ILCS § 14/15(b)(1)-(2).

98. By collecting, storing, using and disseminating Plaintiff's and the NGT Class's biometric identifiers and biometric information as described herein, Defendant, NGT, violated Plaintiff's and the NGT Class's rights to privacy in their biometric identifiers and/or biometric information as set forth in BIPA. *See* 740 ILCS § 14/1, et. seq.

99. Defendant, NGT's online blogs and Privacy Policy show that they were expressly aware of BIPA (and mention it by name) but nevertheless failed to comply with its requirements and therefore committed intentional violations of the law.

100. On behalf of himself and the NGT Class, Plaintiff seeks: (1) declaratory relief; (2) injunctive relief and equitable relief as is necessary to protect the interests of Plaintiff and the NGT

Class by requiring Defendant, NGT, to comply with BIPA's requirements for the collection, storage, use and dissemination of biometric identifiers and biometric information as described herein; (3) statutory damages of $5,000 for each intentional and/or reckless violation of BIPA pursuant to 740 ILCS § 14/20(2), or, in the alternative, statutory damages of $1,000 for each negligent violation of BIPA pursuant to 740 ILCS § 14/20(1); and (4) reasonable attorney's fees and costs and other litigation expenses pursuant to 740 ILCS § 14/20(3).

COUNT IV – VIOLATION OF 740 ILCS 14/15(c) FOR SELLING, LEASING, TRADING AND/OR PROFITING FROM BIOMETRIC IDENTIFIERS OR INFORMATION
(On Behalf of Plaintiff and the NGT Class)

101. Plaintiff incorporates the allegations within paragraphs 1-67 as though fully set forth herein

102. Defendant, NGT, is a New Jersey limited liability company that engages in regular business in Illinois and sends its biometric devices into Illinois to collect biometric information from Illinois residents, and thus qualifies as a "private entity" under BIPA. *See* 740 ILCS § 14/10.

103. Section 15(c) of BIPA prohibits a private entity in possession of biometric identifiers or biometric information from selling, leasing, trading, or otherwise profiting from the biometric identifiers or biometric information without consent from the person whose biometric identifiers or biometric information is at issue. 740 ILCS § 14/15(c).

104. Defendant, NGT, failed and still fails to comply with these BIPA mandates.

105. More specifically, Defendant, NGT's privacy policy states that it does not sell biometrics to third parties "**except** for payroll processors (e.g., ADP, Workday) via encrypted API" (emphasis added). Accordingly, Defendant, NGT, sells, leases, trades, or otherwise profits from biometric identifiers from the person whose biometric identifiers or biometric information is at issue.

106. Plaintiff and members of the NGT Class are individuals who have had their "biometric identifiers" collected and leased, sold, or traded by Defendant, NGT, as explained in detail above. *See* 740 ILCS § 14/10.

107. Plaintiff's and the NGT Class's biometric identifiers were used to identify them and, therefore, constitutes "biometric information" as defined by BIPA. *See* 740 ILCS § 14/10.

108. Defendant, NGT, systematically and automatically collected, used, stored, and sold, leased, traded, or otherwise profited from Plaintiff's and the NGT Class's biometric identifiers and/or biometric information.

109. Defendant, NGT, never informed Plaintiff and the NGT Class in writing that their biometric identifiers and/or biometric information were being sold, leased, traded, or otherwise used to obtain profit.

110. By selling, leasing, trading, or otherwise profiting from Plaintiff's and the NGT Class's biometric identifiers and biometric information as described herein, Defendant, NGT, violated Plaintiff's and the NGT Class's rights to privacy in their biometric identifiers and/or biometric information as set forth in BIPA. *See* 740 ILCS § 14/1, et. seq.

111. Defendant, NGT's online blogs and Privacy Policy show that they were expressly aware of BIPA (and mention it by name) but nevertheless failed to comply with its requirements and therefore committed intentional violations of the law.

112. On behalf of himself and the NGT Class, Plaintiff seeks: (1) declaratory relief; (2) injunctive relief and equitable relief as is necessary to protect the interests of Plaintiff and the NGT Class by requiring Defendant, NGT, to comply with BIPA's requirements for the collection, storage, use and dissemination of biometric identifiers and biometric information as described herein; (3) statutory damages of $5,000 for each intentional and/or reckless violation of BIPA

pursuant to 740 ILCS § 14/20(2), or, in the alternative, statutory damages of $1,000 for each negligent violation of BIPA pursuant to 740 ILCS § 14/20(1); and (4) reasonable attorney's fees and costs and other litigation expenses pursuant to 740 ILCS § 14/20(3).

COUNT V – VIOLATION OF 740 ILCS 14/15(d) FOR FAILURE TO OBTAIN INFORMED WRITTEN CONSENT AND RELEASE BEFORE DISCLOSING BIOMETRIC IDENTIFIERS OR INFORMATION
(On Behalf of Plaintiff and the NGT Class)

113. Plaintiff incorporates the allegations within paragraphs 1-67 as though fully set forth herein

114. Defendant, NGT, is a New Jersey limited liability company that engages in regular business in Illinois and sends its biometric devices into Illinois to collect biometric information from Illinois residents, and thus qualifies as a "private entity" under BIPA. *See* 740 ILCS § 14/10.

115. Section 15(d) of BIPA prohibits a private entity in possession of biometric identifiers or biometric information from disclosing or redisclosing the biometric identifiers or biometric information without consent from the person whose biometric identifiers or biometric information is at issue. 740 ILCS § 14/15(d).

116. Defendant, NGT, failed and still fails to comply with these BIPA mandates.

117. More specifically, Defendant, NGT's privacy policy states that it does not share biometric with third parties "**except** for payroll processors (e.g., ADP, Workday) via encrypted API." Accordingly, Defendant, NGT, discloses biometric identifiers from the person whose biometric identifiers or biometric information is at issue.

118. Plaintiff and members of the NGT Class are individuals who have had their "biometric identifiers" collected and shared by Defendant, NGT, as explained in detail above. *See* 740 ILCS § 14/10.

119. Plaintiff's and the NGT Class's biometric identifiers were used to identify them and, therefore, constitutes "biometric information" as defined by BIPA. *See* 740 ILCS § 14/10.

120. Defendant, NGT, systematically and automatically collected, used, stored, and disseminated Plaintiff's and the NGT Class's biometric identifiers and/or biometric information without first obtaining the written release required by 740 ILCS § 14/15(b)(3).

121. Defendant, NGT, never informed Plaintiff and the NGT Class in writing that their biometric identifiers and/or biometric information were being disclosed or disseminated.

122. By disclosing and/or disseminating Plaintiff's and the NGT Class's biometric identifiers and biometric information as described herein, Defendant, NGT, violated Plaintiff's and the NGT Class's rights to privacy in their biometric identifiers and/or biometric information as set forth in BIPA. *See* 740 ILCS § 14/1, et. seq.

123. Defendant, NGT's online blogs and Privacy Policy show that they were expressly aware of BIPA (and mention it by name) but nevertheless failed to comply with its requirements and therefore committed intentional violations of the law.

On behalf of himself and the NGT Class, Plaintiff seeks: (1) declaratory relief; (2) injunctive relief and equitable relief as is necessary to protect the interests of Plaintiff and the NGT Class by requiring Defendant, NGT, to comply with BIPA's requirements for the collection, storage, use and dissemination of biometric identifiers and biometric information as described herein; (3) statutory damages of $5,000 for each intentional and/or reckless violation of BIPA pursuant to 740 ILCS § 14/20(2), or, in the alternative, statutory damages of $1,000 for each negligent violation of BIPA pursuant to 740 ILCS § 14/20(1); and (4) reasonable attorney's fees and costs and other litigation expenses pursuant to 740 ILCS § 14/20(3).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, WENCONG JIANG, on behalf of himself and the proposed Classes, respectfully requests that this Court enter an Order:

(A) Certifying this case as a class action on behalf of the Classes above pursuant to Fed. R. Civ. P. 23, appointing Plaintiff as representative of the class, and appointing Plaintiff's counsel as Class Counsel;

(B) Declaring that Defendants' actions, as set out above, violate BIPA, 740 ILCS 14/1 *et seq.;*

(C) Awarding statutory damages of $5,000.00 for each and every intentional and reckless violation of the BIPA pursuant to 740 ILCS 14/20(2), or alternatively, statutory damages of $1,000.00 pursuant to 740 ILCS 14/20(1) if the Court finds that Defendants' violations were negligent;

(D) Awarding injunctive and other equitable relief as is necessary to protect the interests of the Class, including, *inter alia,* an order requiring Defendants to collect, store, and use biometric identifiers or biometric information in compliance with the BIPA;

(E) Awarding Plaintiffs and the Class their reasonable litigation expenses and attorney's fees;

(F) Awarding Plaintiffs and the Class pre- and post-judgment interest, to the extent allowable; and

(G) Awarding such other and further relief as equity and justice may require.

JURY TRIAL DEMAND

Plaintiff, WENCONG JIANG, demands a trial by jury on all issues so triable.

Dated: October 21, 2025.

Respectfully Submitted,

USA EMPLOYMENT LAYWERS
JORDAN RICHARDS PLLC
1800 SE 10th Ave. Suite 205
Fort Lauderdale, Florida 33316
Ph: (954) 871-0050
Counsel for Plaintiff and Putative Class

By: */s/ Jordan Richards*
JORDAN RICHARDS, ESQUIRE
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Ph: (415) 677-4497
Counsel for Plaintiff

By: */s/ Shanshan Zou*
SHANSHAN ZOU, ESQUIRE
California Bar No. 263214
Pro Hac Vice Pending
sszlaw@mercalaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing document was filed through CM/ECF and served on all parties below on October 21, 2025.

By: */s/ Jordan Richards*
JORDAN RICHARDS, ESQUIRE
Illinois Bar No. 6328923

SERVICE LIST:

ILND 44 (Rev. 08/23)

CIVIL COVER SHEET

The ILND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(See instructions on next page of this form.)*

I. (a) PLAINTIFFS

WENCONG JIANG, individually and on behalf of all others similarly situated,

(b) County of Residence of First Listed Plaintiff Cook County
(Except in U.S. plaintiff cases)

(c) Attorneys *(firm name, address, and telephone number)*

Jordan Richards PLLC, 1800 SE 10th Ave #1800 Ft. L

DEFENDANTS

ZKTECO USA LLC, a New Jersey limited liability co

County of Residence of First Listed Defendant
(In U.S. plaintiff cases only)
Note: In land condemnation cases, use the location of the tract of land involved.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Check one box, only.)*

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question *(U.S. Government not a party.)*
- ☐ 2 U.S. Government Defendant
- ■ 4 Diversity *(Indicate citizenship of parties in Item III.)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(For Diversity Cases Only.)*

(Check one box, only for plaintiff and one box for defendant.)

	PTF	DEF		PTF	DEF
Citizen of This State	■ 1	☐ 1	Incorporated *or* Principal Place of Business in This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business in Another State	☐ 5	■ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Check one box, only.)*

CONTRACT

- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loan (Excludes Veterans)
- ☐ 153 Recovery of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

PRISONER PETITIONS
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

LABOR
- ☒ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

PROPERTY RIGHTS
- ☐ 820 Copyright
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016 (DTSA)

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729 (a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 485 Telephone Consumer Protection Act (TCPA)
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ■ 890 Other Statutory Actions
- ☐ 891 Agricultural Arts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/Accommodations
- ☐ 445 Amer. w/ Disabilities-Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 463 Habeas Corpus – Alien Detainee (Prisoner Petition)
- ☐ 465 Other Immigration Actions

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAXES
- ☐ 870 Taxes (U.S. Plaintiff or Defendant
- ☐ 871 IRS—Third Party 26 USC 7609

V. ORIGIN *(Check one box, only.)*

■ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

(Enter U.S. Civil Statute under which you are filing and write a brief statement of cause.)

28 U.S.C. 1332(d)(2) - Class Action for Violation of

VII. PREVIOUS BANKRUPTCY MATTERS

(For nature of suit 422 and 423, enter the case number and judge for any associated bankruptcy matter previously adjudicated by a judge of this Court. Use a separate attachment if necessary.)

VIII. REQUESTED IN COMPLAINT:

■ Check if this is a class action under Rule 23, F.R.CV.P. Demand $

CHECK Yes only if demanded in complaint:
Jury Demand: ■ Yes ☐ No

IX. RELATED CASE(S) IF ANY *(See instructions):*

Judge Case Number

X. Is this a previously dismissed or remanded case?

☐ Yes ■ No If yes, Case # Name of Judge

Date: 10/21/2025

Signature of Attorney of Record /s/ Jordan Richards

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.)**

III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.

VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service

VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.