



U.S. District Court for the Southern District of Ohio

Ariane Rose Villarin v. Healthcare Facility Management, LLC, d/b/a CommuniCare Family Of Companies and WorldWide HealthStaff Solutions, LLC

Case No. 1:23-cv-00097-MRB-SKB



Class and Collective Action Notice

Authorized by the U.S. District Court

Are you a foreign-trained nurse who was sponsored by CommuniCare in the immigration process between February 17, 2013 and October 13, 2025?

There is a \$1,000,000 settlement of a lawsuit against CommuniCare and WorldWide HealthStaff Solutions.

You may be entitled to money.

To learn more about this Settlement, read this Notice or scan the QR code above to access the Settlement Website.

Important things to know:

- If you take no action, any ruling from the Court will apply to you, and you will not be able to sue Healthcare Facility Management, LLC, d/b/a CommuniCare Family of Companies and WorldWide HealthStaff Solutions, LLC ("Defendants") about the same issues.
- But, if you take no action as to the collective, you will not be eligible to receive additional money. To receive additional funds, you must return [this FLSA Opt-In and Release Form](#).

- If you have questions or need assistance, please call 1-800-469-1595
- You can learn more at: www.CommuniCareSettlement.com.

Table of Contents

Table of Contents	2
About This Notice	3
Why did I get this Notice?	3
What do I do next?	3
What are the most important dates?	4
Learning About the Lawsuit	5
What is this lawsuit about?.....	5
What is the position of CommuniCare and WorldWide?.....	5
Why is there a settlement in this lawsuit?	5
Has the Court determined that Plaintiffs or Defendants have won?.....	6
What happens next in this lawsuit?.....	6
Learning About the Settlement	6
What does the Settlement provide?	6
How do I know if I am part of the Settlement?.....	7
How much will my payment be?.....	8
What am I giving up to stay in the Settlement Class and/or to join the Settlement Collective?	8
Deciding What to Do	9
How do I weigh my options?	9
Receiving a Payment	10
How can I get a payment?	10
How do I opt into the FLSA Settlement Collective and receive additional money?.....	10
Do I have a lawyer in this lawsuit?	10
Do I have to pay the lawyers in this lawsuit?.....	10
Opting Out	11
What if I don't want to be part of this Settlement?.....	11
How do I opt out?	11
Objecting	12
What if I disagree with the Settlement?	12

Doing Nothing 12
 What are the consequences of doing nothing?..... 12
Key Resources 13
 How do I get more information?..... 13

About This Notice

Why did I get this Notice?

This Notice is to tell you about the Settlement of a class and collective action lawsuit, *Ariane Rose Villarin v. Health Care Facility Management, LLC d/b/a CommuniCare Family of Companies, et al.*, brought on behalf of all foreign-trained registered nurses sponsored by CommuniCare through the immigration process from February 17, 2013 through October 13, 2025. **You received this Notice because CommuniCare and WorldWide’s records identify you as a member of the group of people affected, called the “class”.** This Notice gives you a summary of the terms of the proposed Settlement Agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this Notice to understand the Settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Do Nothing	<p>Get a payment (but not payment on a Fair Labor Standards Act claim – see below for that). The amount you receive will be based on the length of time you worked for CommuniCare. The longer you worked, the higher your amount will be. You will also give up rights resolved by settlement.</p> <p>If you have already paid money to CommuniCare in connection with resigning before the end of your contract, you will receive approximately half of that amount back.</p> <p>You may also benefit from changed practices. If you currently owe money to CommuniCare or WorldWide Staffing for resigning before the end of your contract, you will not have to pay. If you are a current employee and if, in the future, you resign before the end of your contract, you will not owe money. Further details about the changes that would benefit you are provided in the</p>

	section “Learning About the Settlement” below.
Submit an Opt-In Form by June 4, 2026 to receive additional payment	<p>Receive the benefits described above, and also receive more money (by approximately 10%) for your non-reimbursement share of the Settlement. See the section “How much will my payment be?” below.</p> <p>Give up right to bring Fair Labor Standards Act (FLSA) and related state wage & hour claims resolved by this Settlement. See the section “What am I giving up to stay in the Settlement Class and/or to join the Settlement Collective?” below.</p>
Opt Out	<p>Get no payment and you may not benefit from some of the changed practices.</p> <p>Retain the right to bring any claims you may have against Defendants.</p> <p>See the section “Opting Out” below.</p>
Object	<p>Tell the Court why you don’t like the Settlement. You cannot object if you opt out.</p> <p>See the section “Objecting” below.</p>

Read on to understand the specifics of the Settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to opt-in for additional payment: **June 4, 2026**

Your deadline to object or opt out: **June 4, 2026**

Settlement approval hearing: **July 8, 2026 at 1:00 p.m. EST**

Your deadline to submit an FLSA opt-in form: **June 4, 2026**

Learning About the Lawsuit

What is this lawsuit about?

This lawsuit is brought by Plaintiff Ariane Rose Villarin against Healthcare Facility Management, LLC, d/b/a CommuniCare Family of Companies and WorldWide Healthstaff Solutions, LLC. The lawsuit is brought on a class action basis and a collective action basis.

The lawsuit involves Defendants' alleged employment practices, including claims relating to the contracts between CommuniCare/WorldWide and Healthcare Workers, the legality and enforceability of certain provisions in those contracts (including, in certain instances, Healthcare Workers' payments to CommuniCare/WorldWide under those contracts).

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:

www.CommuniCareSettlement.com

What is the position of CommuniCare and WorldWide?

CommuniCare and WorldWide dispute the allegations in the lawsuit and deny any wrongdoing. They have entered this Settlement to avoid the further time and expense of ongoing litigation.

Why is there a settlement in this lawsuit?

In October 2025, the Parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The Settlement is on behalf of the nurse who brought the case and all members of the Settlement Class. The Court has not decided this case in favor of either side, nor that anyone could recover any certain amount in this litigation.

If approved, the Settlement will stop the lawsuit from being litigated any further. If the case continued to be litigated, there is a possibility that Defendants would prevail and the Settlement Class and Collective would receive nothing. There is also the possibility that Defendants would be required to pay more than they have agreed to pay under the Settlement.

Class Counsel investigated the facts and applicable law regarding the claims and defenses. The Parties engaged in lengthy and arms' length negotiations to reach this

What is a class action settlement?

A class action settlement is an agreement between the Parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that the plaintiff allege caused harm to class members.

Settlement. The Class Representatives and Class Counsel believe that the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Class and Collective.

Has the Court determined that Plaintiffs or Defendants have won?

No. This is a settlement, which means the Parties have resolved the matter before the Court has entered a judgment deeming any party the “winner.”

What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the Settlement. The hearing will be held at:

Where: U.S. District Court for the Southern District of Ohio, Courtroom 109, 100 East Fifth Street, Cincinnati, OH 45202.

When: 1:00 PM EST on July 8, 2026.

The Court has directed the Parties to send you Notice about the proposed Settlement. Because the Settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the Settlement before it can take effect. Payments will only be made if the Court approves the Settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the Settlement. If the Court does not approve the Settlement or the Parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.CommuniCareSettlement.com.

Learning About the Settlement

What does the Settlement provide?

CommuniCare and WorldWide have agreed to pay a total of \$1,000,000 to resolve this case.

If you have paid Defendants any money in connection with resigning before the end of your contract, you will receive approximately half of that money back. A total of 54 class members will benefit from this relief, which for all of these class members will total \$309,268.

The balance of the settlement amount, after payment of Class Counsel's expected costs and fees, will be distributed through this Settlement in this Litigation to all Class Members after reduction for any Court-approved amounts for the lawyers and the Plaintiff who brought this case.

The amount you receive will be based on how long you worked for Defendants. The longer you worked, the more you will receive. Additionally, if you are eligible to opt into the Settlement Collective and do so, the amount you will receive (excluding any reimbursement of amounts paid to CommuniCare) will be increased by approximately 10%. You must return the Opt-In Form in order to get this additional money. *Please note that your check will be accompanied by a Form 1099 and Form W-2. Neither Defendants nor Class Counsel are providing you tax advice through this Settlement, so you will be responsible for seeking your own tax and/or accounting advice regarding your tax obligations.*

In addition, as part of the Settlement, Defendants have agreed to fully forgive all outstanding amounts claimed or that could be claimed to be owed by Settlement Class Members to Defendants—including both former and current nurses—due to a nurse's decision to end their employment with CommuniCare prior to the end of the contractual term in their contracts with Defendants. Defendants shall not seek to enforce any "repayment" provisions in their contracts, or to recover or collect any amount of money damages or penalties from Settlement Class Members, due to the decision to end employment with Defendants prior to the end of their contracts.

This means that the Settlement provides the following additional benefits to class members, which Defendants have valued at over \$1.2 million in relief from alleged debt:

- **You will not be required to pay Defendants any money in connection with you leaving your job before the end of your contract, even if Defendants have previously said that you do owe money.**
- If, as of October 13, 2025, you were a current employee, you will benefit from changed practices. Specifically, **if you resign prior to the end of your contract, you will not have to pay Defendants.**

This is just a summary of the benefits that are available through the Settlement. Please refer to the full Settlement Agreement linked [here](#) for all details.

How do I know if I am part of the Settlement?

If you received a Postcard, Email, or Text Notice, Defendants' records indicate that you are a registered nurse sponsored by CommuniCare through the immigration process from February 17, 2013 through October 13, 2025—meaning that you are a member of the Settlement Class.

If you received a Postcard or Email Notice, Defendants' records indicate that you are also eligible to become a member of the FLSA Settlement Collective and receive an additional payment because you are a registered nurse sponsored by CommuniCare through the immigration process from February 17, 2013 through October 13, 2025. To receive that payment, you must submit (by mail or electronically) the FLSA Consent and Release Form.

How much will my payment be?

Your payment amount will depend on several factors:

- First, if you paid Defendants any money in connection with leaving before the end of your contract, you will receive approximately half of that money back. (If you did not pay Defendants any such money, you will not receive any such repayment.)
- Second, whether or not you paid Defendants money in connection with ending your contract early, you will receive an additional amount to compensate you for the claims raised in this case, which will be based on how long you worked for Defendants. The longer you worked, the more you will receive. Additionally, if you opt into the Settlement Collective, the amount you receive for this portion of your payment will be increased by approximately 10%.
- If you do not join the Settlement Collective, you will still receive payment if the Court approves the Settlement (unless you opt out of the Settlement Class). Your payment will just be a lower amount.

What am I giving up to stay in the Settlement Class and/or to join the Settlement Collective?

If the Court approves this Settlement, then when the Settlement becomes effective, all Settlement Class Members who have not timely and properly opted out of the Settlement Class will release CommuniCare, WorldWide, and each of their (as applicable affiliated/related parties and individuals) from the following claims:

Any and all claims raised on behalf of the Class in the Litigation and any and all claims of any conceivable kind or nature whatsoever that are based on the Class claims made in the Second Amended Complaint or reasonably related thereto. Without limiting the foregoing, this release includes a release of each entity within the CommuniCare Family of Companies and WorldWide Family of Companies, as well as owners, agents, employees, insurers and reinsurers, officers, directors, attorneys and all related individuals. If you opt into the Settlement Collective, you will also release Defendants (and all affiliated/related parties and individuals) from FLSA claims (and any parallel state wage and hour claims) raised on behalf of the Collective in the Litigation (alleged

failure to pay all compensable hours, alleged failure to pay overtime compensation for work performed during meal periods and during off-the-clock hours, alleged demand that the Settlement Collective Members pay an unlawful kickback, alleged failure to pay at least the minimum wage “free and clear” in each workweek, and alleged failure to record all time worked). Without limiting the foregoing, this release includes a release of each entity within the CommuniCare Family of Companies and WorldWide Family of Companies, as well as owners, agents, employees, insurers and reinsurers, officers, directors, attorneys and all related individuals. Settlement Collective Members will not be eligible to recover any damages or other relief related to such FLSA claims from either Defendant or any affiliated entity.

This release may affect your rights, and may carry obligations, in the future. To view the full terms of this release that are contained in the Settlement Agreement, as well as the operative Second Amended Complaint and other related documents, please click [here](#).

Deciding What to Do

How do I weigh my options?

You have four options. You can stay in the Settlement and submit an Opt-In and Release Form for additional compensation, you can opt out of the Settlement, you can object to the Settlement, or you can do nothing. This chart shows the effects of each option:

	Do Nothing	Submit an Opt-In Form	Opt out	Object
Can I receive settlement money if I . . .	YES	YES	NO	YES
Can I receive additional settlement money if I . . .	NO	YES	NO	NO
Am I bound by the terms of this lawsuit if I . . .	YES	YES	NO	YES
Can I pursue my own case if I . . .	NO	NO	YES	NO
Will the class lawyers represent me if I . . .	YES	YES	NO	NO

Receiving a Payment

How can I get a payment?

Settlement payments will be made via check or—if you used direct deposit while you worked for CommuniCare—to the last bank account you had on file with CommuniCare. If you would like to receive payment in a different way (i.e., to a different bank account, or via Zelle) you must elect a new payment method by clicking [here](#) or by contacting the Settlement Administrator at 1-800-469-1595 or CommuniCareSettlement@atticusadmin.com.

If you have moved since you worked for CommuniCare, you can also update your mailing address to receive your check by clicking [here](#).

How do I opt into the FLSA Settlement Collective and receive additional money?

Settlement Class Members who are eligible to become part of the Settlement Collective and do so by returning or electronically submitting the FLSA Opt-In and Release Form will receive a larger payment than those who do not submit the form. To become part of the Collective, you must fill out and mail or submit the form that was mailed to you. The form is also available and can be filled out online [here](#). If you mail the form, it must be postmarked by **June 4, 2026**. If you submit the form electronically, you must do so by **June 4, 2026**.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this Settlement, the Court has appointed the following individuals and lawyers.

Your lawyers: Kakalec Law PLLC (Patricia Kakalec), Katz Banks Kumin LLP (Hugh Baran), The Law Office of Magen E. Kellam, P.A. (Magen E. Kellam), The Law Firm of Shihab & Associates (Gus M. Shihab) and Towards Justice (Juno Turner) **have been appointed as Class Counsel.**

These are the lawyers who negotiated this Settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to**

pay the lawyers directly.

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$338,100 total in attorneys' fees and reimbursement of out-of-pocket expenses, and costs of settlement administration up to \$12,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a service payment of \$15,000 to the Class Representative Ariane Rose Villarín for the time and effort she contributed to the case. If approved by the Court, the Service Award will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this Settlement?

You can opt out. If you do, you will not receive payment and cannot object to the Settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case. You cannot exclude yourself from the program changes called for by the proposed Settlement.

How do I opt out?

To opt out of the Settlement, you must complete the opt out form [here](#) and mail it by June 4, 2026 to the Settlement Administrator at:

CommuniCare/WorldWide Settlement
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
1-800-469-1595

Be sure to include your name, address, telephone number, and signature.

Objecting

What if I disagree with the Settlement?

If you disagree with any part of the Settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the Settlement — it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- (1) is postmarked by June 4, 2026;
- (2) includes the case name and number (*Villarin v. Healthcare Facility Management, LLC*, Case No. 1:23-cv-00097-MRB-SKB)
- (3) includes your full name, address and telephone number, and email address (if you have one);
- (4) states the reasons for your objection;
- (5) says whether either you or your lawyer intend to appear at the Final Approval Hearing and your lawyer's name;
- (6) your signature.

Mail the letter to:

CommuniCare/WorldWide Settlement c/o Atticus Administration PO Box 64053 St. Paul, MN 55164 1-800-469-1595	U.S. District Court for the Southern District of Ohio 100 East Fifth Street Cincinnati, OH 45202
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Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will get a payment and other relief, and will still be bound by the Settlement and its "release" provisions. That means you won't be able to start, continue, or be part of any other lawsuit against CommuniCare, WorldWide, and each of their (as applicable) respective owners, members, officers, employees, partners, benefit plans, plan administrators, insurers, agents, attorneys, representatives, benefit plans, plan administrators, counsel, shareholders, agents, representatives, dependents, heirs, and executors, about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found [here](#).

Key Resources

How do I get more information?

This Notice is a summary of the proposed Settlement. The complete settlement with all its terms can be found [here](#). To get a copy of the Settlement Agreement or get answers to your questions:

- contact your lawyers (information below)
- visit the case website at www.CommuniCareSettlement.com
- access the Court Electronic Records (PACER) system online or by visiting the Clerk's office of the Court (address below).

Resource	Contact Information
Case website	www.CommuniCareSettlement.com
Settlement Administrator	CommuniCare/WorldWide Settlement c/o Atticus Administration PO Box 64053 St. Paul, MN 55164 1-800-469-1595
Your Lawyers	KAKALEC LAW PLLC Patricia Kakalec 26 Court Street, Suite 1612 Brooklyn, NY 11242 (212) 705-8730 Patricia@KakalecLaw.com KATZ BANKS KUMIN LLP Hugh Baran Susanna Barron 111 Broadway, Suite 1403 New York, NY 10006 (646) 759-4501 Baran@KatzBanks.com Barron@KatzBanks.com THE LAW OFFICES OF MAGEN E. KELLAM, P.A. Magen E. Kellam 808 Wiggins Pass Road, Suite 204

	<p>Naples, FL 34110 magenk@kellamlegal.com TOWARDS JUSTICE Juno Turner 1580 N. Logan St. Ste. 660 PMB 44465 Denver, CO 80203-1994 juno@towardsjustice.org</p>
Court (DO NOT CONTACT)	<p>U.S. District Court for the Southern District of Ohio 100 East Fifth Street Cincinnati, OH 45202</p>