



9327 Fairway View Place, Suite 100  
Rancho Cucamonga, CA 91730  
Tel: 909-919-2027  
Fax: 888-375-2102  
[www.myerslawgroup.com](http://www.myerslawgroup.com)

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February 6, 2026

**VIA ONLINE FILING**

Labor & Workforce Development Agency  
Website: <https://dir.govfa.net/418>

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Pomona Valley Hospital Medical Center  
Attn: CEO and/or President  
1798 Garey Ave  
Pomona, CA 91767

Re: Kathryn Andrade v. Pomona Valley Hospital Medical Center

**NOTICE PURSUANT TO LABOR CODE SECTION 2699.3, *et seq.*; VIOLATIONS OF  
LABOR CODE SECTIONS 226, 226.7, 512, 2802, and 2804 & IWC Wage Order No. 5-  
2001, BY POMONA VALLEY HOSPITAL MEDICAL CENTER**

To: California Labor and Workforce Development Agency; Pomona Valley Hospital  
Medical Center

From: Kathryn Andrade, on behalf of all aggrieved employees as defined below

This letter is intended to comply with the requirements of California Labor Code Private Attorneys General Act of 2004 (PAGA), California Labor Code section 2698, *et seq.*, including section 2699.3 with respect to notice of violations of the Labor Code and Wage Order by Pomona Valley Hospital Medical Center (hereinafter “Respondent”). Unless the Labor & Workforce Development Agency proceeds against Respondent, Kathryn Andrade (“Claimant”), intends to file against Respondent to add a PAGA cause of action on her behalf and on behalf all other “aggrieved employees” that seeks civil penalties, costs, and attorney fees under PAGA.

Please note that this firm represents the interests of Claimant and:

all other current and former California hourly non-exempt employees of Respondent who provide/provided provide patient care services for Respondent within the relevant time period. (“aggrieved employees”).

Claimant is informed and believes that she and the other aggrieved employees regularly worked more than six (6) hours and/or ten (10) hours per workday for Respondent. Claimant is informed and believes that Respondent failed to provide her and the aggrieved employees the requisite number of timely off-the-clock meal periods of not less than thirty (30) minutes, without exemption. Claimant is informed and believes that Respondent failed to provide her and the aggrieved employees the requisite number of non-captive paid rest periods in shifts of four (4) hours or greater, such that Respondent did not provide her and other aggrieved employees a ten (10) minute paid rest periods for every four (4) hours of work, or major fraction thereof. Claimant is informed and believes that Respondent failed to reimburse necessary business expenses, due to its common plan that failed to indemnify costs incurred by her and the aggrieved employees. Claimant further contends that Respondent failed to provide her and the aggrieved employees accurate itemized wage statements with the correct gross wages earned, net wages earned, and/or inclusive of meal and rest period premium payments.

Claimant alleges that Respondent violated Labor Code §§226, 226.7, 512, 2802, 2804 in addition to claims under the Business and Professions Code §17200, *et seq.* Claimant further alleges that Respondent violated IWC Wage Order No. 5-2001 (“WO 5-01”).

Claimant performed work for Respondent as a California based hourly non-exempt, employee who provided direct care services during the relevant time period.

Claimant is informed, believes and thereon alleges that Respondent failed and continued to fail to provide timely, non-captive, duty-free meal periods of not less than thirty (30) minutes for shifts lasting longer than five (5) hours and ten (10) hours, without exemption, in violation of Labor Code §§512 and 226.7 and WO 5-01. Claimant is informed and believes, and on that basis alleges that Respondent fails to provide Claimant and the aggrieved employees with one hour of premium pay per non-compliant meal period per day at the regular rate of pay.

Claimant further alleges that Respondent failed and continues to fail to provide compliant paid, ten (10) minute rest periods to her and the aggrieved employees in violation of Labor Code §§512 and 226.7 and WO 5-01. Respondent fails to provide timely non-captive paid rest periods for every four (4) hours, or major fraction thereof, by failing to provide scheduled relief for Claimant and the aggrieved employees to take rest periods. Claimant and the aggrieved employees are not provided captive duty-free paid ten (10) minute rest periods for every four (4) hours worked or major fraction thereof, without exemption. Respondent fails to provide rest period premium payments at the regular rate of pay, in lieu thereof.

Claimant further alleges that Respondent failed and continues to fail to indemnify Claimant and the aggrieved employees for costs incurred in direct consequence of the discharge of their duties to Respondent, including but not limited to personal cell phones. Claimant and the aggrieved employees incurred necessary business-related costs that were not fully reimbursed by Respondent, in violation of Labor Code §§2802, *et seq.*

The wage statements provided by Respondent to Claimant and other aggrieved employees fail to provide accurate information as to the gross wages earned, net wages earned, and the total

hours worked, and/or listing the meal and rest period premium payments, in violation of Labor Code §226.

Please advise if the LWDA has any objection to our client filing a PAGA cause of action to seek any and all appropriate civil penalties for these underlying factual allegations and Labor Code violations, pursuant to Labor Code §2699, *et seq.*

Very truly yours,  
**THE MYERS LAW GROUP, A.P.C.**

A handwritten signature in black ink, appearing to read 'Andriana N. Bravo'.

Andriana N. Bravo, Esq.

*Attorneys for Kathryn Andrade and the aggrieved employees*