



March 16, 2020

Via Certified Mail 7019 1640 0000 8031 6592

NK Investments LP
42 Corporate Park, Suite 200
Irvine, California 92606

In re Ana Maldonado - Notice of PAGA Claim

To Whom It May Concern:

This office has been retained by Ana Maldonado (hereinafter "Plaintiff"), a former employee of NK Investments LP. Pursuant to Labor Code § 2699.3(a), we are providing written notice that NK Investments LP violated various provisions of the California Labor Code. Plaintiff intends on filing a complaint against NK Investments LP in San Bernardino County Superior Court pursuant to Labor Code § 2699 et. seq. on behalf of herself and all hourly employees for NK Investments LP ("Aggrieved Employees").

During the entirety of her employment with NK Investments LP, Plaintiff and Aggrieved Employees were denied overtime pay at an overtime rate for their overtime hours works. Moreover, Plaintiff and Aggrieved Employees were denied the ability to take meal breaks and rest breaks on an almost daily basis. As a result, Plaintiff and Aggrieved Employees were provided with inaccurate wage statements.

Accordingly, NK Investments LP is in violation of the following provisions of the Labor Code § 2699.5: § 201-204 (Waiting Time Penalties); § 226.7 and 512 (Meal and Rest Periods) and § 226 (Wage Statement Accuracy) and §§ 510-515 (Unpaid Overtime). Please be advised Plaintiff intends to enforce these claims against all owners, directors, officers, and managing agents of NK Investments LP under section 558.1 of the Labor Code. Finally, pursuant to Labor Code § 2699.3(a)(1), Plaintiff will serve the same written notice to NK Investments LP by and through its respective agents of service of process by certified mail.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Zambrano".

Ronald L. Zambrano, Esq.

CC: California Labor and Workforce
Development Agency