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In Memoriam

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VIA LWDA ONLINE FILING SYSTEM

Labor & Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
PAGA@dir.ca.gov
<https://dir.tfaforms.net/207>

Dear PAGA Administrator,

My office represents Ms. Tina Ahoubim, who intends to pursue a claim for Labor Code violations against her former employers on behalf of herself and others current and former aggrieved employees. Under the California Labor Code Private Attorneys General Act of 2004 (“PAGA”), the purpose of this letter is to satisfy the requirements of Labor Code¹ section 2699.3 and all other applicable notice and exhaustion requirements.

The employers and persons liable and/or responsible for the violations listed herein are: (1) Educational Awakening Center, located at 18345 Ventura Blvd, Tarzana, CA 91356; (2) Sam Navid; (3) Ariya Malek; and (4) all other related parties that have at this time not been identified (collectively, the “Employers”). Ms. Ahoubim was employed as a non-exempt staff member at Educational Awakening Center.

Our investigation has revealed that these Employers and persons have all violated and/or are liable under numerous provisions of California law with respect to Ms. Ahoubim, and all other current or former similarly situated employees who were misclassified as volunteers and reported, complained, and/or refused to participate in the unhealthy, unsafe, and/or unlawful

¹ All references herein to Labor Code are to the California Labor Code.

work conditions at Educational Awakening Center between,² including but not limited to the following:

- Not paid wages as required by Labor Code §§ 201 & 204;
- Not paid minimum wage as required by Labor Code § 1182.12, the applicable IWC Wage Order;
- Not paid all wages due upon termination as required by Labor Code § 201;
- Not paid all wages due upon quitting, or within 72 hours of quitting, as required by Labor Code §§ 202, 203;
- Not paid overtime as required by Labor Code § 510
- Not paid for all necessary business expenses or losses incurred upon termination as required by Labor Code § 2802;
- Denied meal periods required by Labor Code § 512 and the applicable IWC Wage Order and have not been compensated for such missed meal periods as required by Labor Code § 226.7;
- Denied rest periods required by the applicable ICW Wage Order and have not been compensated for such missed rest periods as required by Labor Code § 226.7; and
- Denied premiums and/or penalties injunctive relief, attorneys' fees, costs, and interest under the Labor Code including, but not limited to, under §§ 210, 218, 218.5, 218.6, 226, 226.3, 558, 1174.5, 1194, 1194.2, 1194.3, 1194.5, 1197.1, 1198, and 2802.

On information and belief, the Employers have a pattern and practice of preventing and/or discouraging employees from reporting legal violations and retaliating against employees who report legal violations by Employers. Unless the Labor & Workforce Development Agency proceeds with an action, Ms. Ahoubim intends to pursue claims against Employers pursuant to Labor Code §§ 2698, 2699 et seq. on behalf of herself and all other similarly situated, aggrieved employees.

If you wish to investigate this matter, we respectfully request that you provide notice within 60 days. Because this letter is not intended as an exhaustive recitation of the facts, if you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Genie Harrison, Esq.

² All references to Ms. Ahoubim include all other current and former employees of the Employers.

cc : Educational Awakening Center
c/o Brian Ning, Esq.
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(via email and certified mail)

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