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June 2, 2016

VIA CERTIFIED U.S. MAIL, RETURN RECEIPT REQUESTED

Douglas Hoffner
Acting Secretary
California Labor & Workforce Development Agency
800 Capital Mall, MIC-55
Sacramento, CA 95814

Re: **Vista Cove at Corona, Inc.**
California Labor Code section 2699, *et seq.* violations

Dear Mr. Hoffner:

I am writing on behalf of aggrieved former employee Jennifer Rudd. This notice is being made to the Labor & Workforce Development Agency pursuant to the requirement of Labor Code section 2699.3 that Rudd and other aggrieved employees suffered from one or more of the following Labor Code violations by their current or former employer Vista Cove at Corona, Inc.

Vista Cove at Corona, Inc. failed to pay its employees overtime in accordance with state law when they worked in excess of 8 hours in a day and/or 40 hours within a workweek. Rudd and other aggrieved employees were not provided with off the clock meal periods and would instead at times work straight thru the day without any meal period. Additionally, Rudd and other aggrieved employees were not provided a premium wage pursuant to Labor Code section 226.7 for their unprovided meal periods as they were not relieved of all duties and responsibilities as required by the law. Vista Cove at Corona, Inc.'s failure to properly pay Rudd and other aggrieved employees for all hours worked in these instances violate Labor Code sections 201, 202, 203, 204, 223, 510, 1194 and 1198.

Additionally, Vista Cove at Corona, Inc. required Rudd and other aggrieved employees to work without appropriate compensation, including the payment of at least minimum wage for such work time as described above in violation of Labor Code sections 201, 202, 203, 204, 223, 510, 1194, 1197, 1197.1 and 1198, and the Industrial Welfare Commission ("IWC") Wage Orders, Section 3.

Vista Cove at Corona, Inc. also failed to provide Rudd and other aggrieved employees with meal periods in accordance with Labor Code Sections 512 and 226.7 as

employees at times were not afforded an opportunity to take an off-duty meal period of at least 30 minutes within the first five hours of their shift because of work demands. Vista Cove at Corona, Inc. also failed to pay its employees a premium pursuant to Labor Code section 226.7 when it failed to provide its employees with legally adequate meal periods as described above.

Vista Cove at Corona, Inc. also failed to provide Rudd and other aggrieved employees with a 10 minute rest break for every four hours of work, or every major fraction thereof as employees were forced to work extended periods without rest breaks (and at times meal periods) due to work demands. Vista Cove at Corona, Inc. also failed to provide its employees with a premium pursuant to Labor Code section 226.7 when it failed to provide its employees with legally adequate rest breaks.

California Labor Code section 226(a) provides that every employer shall furnish to each of its employees an accurate itemized wage statement in writing, showing, among other things, all applicable hourly rates in effect during the pay period and the corresponding correct number of hours worked at each hourly rate by the employee. Vista Cove at Corona, Inc.'s wage statements fail to comply with this section of the Labor Code as they list the incorrect number of hours worked at each rate of pay. The number of hours that the employees actually spent working for the company, which are listed on the pay stubs, is incorrect because of the company's failure to properly compensate its employees for all of the time that they spent working under their employer's control due to its refusal to allow Rudd and other similarly situated employees to record overtime hours.

Rudd and all aggrieved employees of Vista Cove at Corona, Inc., to whom Vista Cove at Corona, Inc. willfully failed to pay for all hours worked, as described herein, are also entitled to up to thirty days of wages pursuant to California Labor Code sections 201, 202 and 203.

Very truly yours,

GLEASON & FAVAROTE LLP



Paul Gleason

PMG/lg



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Long Beach

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Douglas Hoffner

Acting Secretary

California Labor & Workforce Development Agency

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Sacramento, CA 95814

State of California
Labor & Workforce Development Agency

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OF THE RETURN ADDRESS. FOLD AT DOTTED LINE