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January 22, 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: **LeFiell Manufacturing Company**
California Labor Code section 2699, *et seq.* violations

Dear Mr. Hoffner:

I am writing on behalf of aggrieved former employee Robin Willis ("Willis"). This notice is being made to the Labor & Workforce Development Agency pursuant to the requirement of Labor Code section 2699.3 that Willis and other aggrieved employees suffered from one or more of the following Labor Code violations by their current or former employer LeFiell Manufacturing Company.

LeFiell Manufacturing Company 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. LeFiell Manufacturing Company also failed to pay its employees doubletime in accordance with California state law. Willis and other aggrieved employees were frequently required to work during their meal periods. During these so-called "working lunches" employees were required to attend audits, client meetings and other work events for which they were not paid. Additionally, Willis 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. Additionally, Willis and other aggrieved employees were not paid for all of the time in which they were under the control of their employer as the company implemented improper rounding policies and practices which consistently rounded to the detriment of its employees. Willis and other aggrieved employees were also not paid for all of the time in which they were under the control of their employer when they traveled for work including to client training, meetings and classes that they were obligated to attend. When traveling, Willis and other aggrieved employees were also not paid for all of the time they spent waiting for their flight, during layovers, and travel to and from the client's location for out of town meetings and

training. LeFiell Manufacturing Company's failure to properly pay Willis 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, LeFiell Manufacturing Company required Willis 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.

LeFiell Manufacturing Company also failed to provide Willis and other aggrieved employees with meal periods in accordance with Labor Code Sections 512 and 226.7 as employees were often 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, understaffing, audits and meetings as evidenced by the employee time records. Additionally, when employees worked in excess of 10 hours in a day they were not offered an opportunity to take a second meal period in accordance with Labor Code section 512. LeFiell Manufacturing Company 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.

LeFiell Manufacturing Company also failed to provide Willis 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 understaffing, audits, meetings and other work demands. LeFiell Manufacturing Company 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.

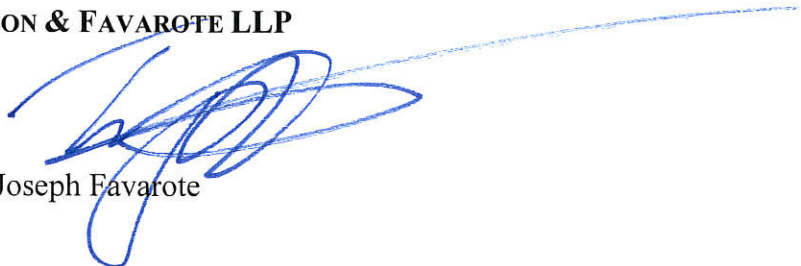
California Labor Code section 226(a) provides that every employer shall furnish to each of its employees an accurate itemized wage statement in writing, showing, among other things, all applicable hourly rates in effect during the pay period and the corresponding correct number of hours worked at each hourly rate by the employee. LeFiell Manufacturing Company's wage statements fail to comply with this section of the Labor Code as they list the incorrect rates of pay and 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 improper rounding practices, and its failure to pay for all work time, including during "working lunches." Additionally, the overtime rate that is listed on each employees' paycheck stub represents just one third of their actual overtime rate.

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Willis and all aggrieved employees who were separated from their employment with LeFiell Manufacturing Company, to whom LeFiell Manufacturing Company 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


Torey Joseph Favarote

TJF/ts

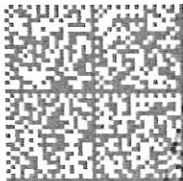
cc: LeFiell Manufacturing Company
c/o William Mitchell
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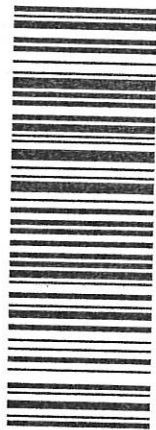
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State of California
Labor & Workforce Development Agency

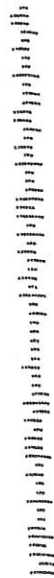
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