

THE RUTTEN LAW FIRM, APC

4221 Coldwater Canyon Avenue
Studio City, California 91604
Telephone: (818) 308-6915
www.RuttenLawFirm.com

Email:

February 4, 2016

VIA CERTIFIED MAIL

Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Re: *Jack Hormozi v. Wal-Mart Stores, Inc., et al.*

Dear PAGA Administrator:

This firm is legal counsel to Jack Hormozi. Mr. Hormozi intends to bring wrongful termination, retaliation and other related actions against WAL-MART STORES, INC., a Delaware corporation and WAL-MART ASSOCIATES, INC., a Delaware corporation (collectively, "WAL-MART"). These entities' agents for service of process are:

WAL-MART STORES, INC., CT Corporation system, 818 West Seventh St., Ste 930, Los Angeles, CA 90017

WAL-MART ASSOCIATES, INC., CT Corporation system, 818 West Seventh St., Ste 930, Los Angeles, CA 90017

This letter is sent pursuant to the provisions of California Labor Code sections 2699 and 2699.3. The purpose of this letter is to determine whether the LWDA intends to investigate WAL-MART's violation of *Labor Code* § 1102.5 as alleged in summary below.

Mr. Hormozi was hired by WAL-MART in 2005 and worked as an Assistant Store Manager at various WAL-MART Supercenters for 10 years. Despite holding a managerial position, Mr. Hormozi was regularly required to perform manual labor and work significant amounts of regular and overtime hours performing non-managerial tasks. WAL-MART did not pay Mr. Hormozi overtime as required by law. WAL-MART also regularly failed to allow Plaintiff to take rest breaks and meal breaks as required by law.

Mr. Hormozi complained both written and orally about WAL-MART's labor code

violations. WAL-MART's response to Mr. Hormozi's complaints was to engage in a systematic pattern of retaliation, ultimately leading to WAL-MART's termination of Mr. Hormozi on March 19, 2015.

The foregoing is intended only as a summary and not as an exhaustive recitation of the facts or potential Labor Code claims that Mr. Hormozi may have against WAL-MART. Mr. Hormozi intends to file a civil lawsuit which will include claims for violation of *Labor Code* § 1102.5 and remedies under California's Private Attorney Generals Act of 2004. This letter is sent as an inquiry to determine whether the LWDA wishes to investigate Mr. Hormozi's allegations as to the direct violations of *Labor Code* § 1102.5 and the potential resulting penalties under the Labor Code, including, but not limited to, attorney's fees and costs under section 2699(g)(1).

Should you need any further information, please do not hesitate to contact us.

Very truly yours,



Luke Sheldon

cc: WAL-MART STORES, INC.
WAL-MART ASSOCIATES, INC.

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7012 2920 0000 1426 7508



ATTN: PAGA Administrator
1515 Clay St., STE 801
Oakland CA 94612-1463

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