



January 10, 2025

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814

VIA CERTIFIED U.S. MAIL

Cloudflare, Inc.
101 Townsend Street
San Francisco, CA 94107

Re: PAGA Notice of California Labor Code Claims against Cloudflare

Dear PAGA Administrator:

Shavitz Law Group, P.A. represents Sonia Koroleva, a former Account Executive employed by Cloudflare. Ms. Koroleva was employed by Cloudflare in California as an Account Executive from approximately June 2023 to January 2024.

As set forth below, Ms. Koroleva alleges that Cloudflare failed to pay California-based Account Executives, however variously titled (collectively, "Aggrieved Employees"), as required by California law. Specifically, Ms. Koroleva alleges that Cloudflare failed to pay Aggrieved Employees overtime wages for all hours worked over 8 in a day or over 40 in a week, failed to provide them with legally compliant meal breaks, failed to reimburse them for necessary business expenses, failed to furnish them with accurate wage statements, and failed to pay them all earned wages timely and upon discharge.

Cloudflare classifies Aggrieved Employees as exempt employees who are not entitled to overtime pay. However, Aggrieved Employees' primary duties do not qualify for any overtime exemption under California law. Although Aggrieved Employees regularly work a significant amount of time beyond 40 hours per week and 8 hours per day, upon information and belief, Cloudflare knowingly, intentionally, and/or willfully does not pay them for this overtime work. Additionally, Aggrieved Employees are not provided with *bona fide* meal breaks despite entitlement to same, such that Aggrieved Employees regularly work through meal breaks.

Furthermore, Aggrieved Employees incur necessary business expenses including, but not limited to, home internet/data expenses. However, Cloudflare, upon information and belief, knowingly, intentionally and/or willfully does not reimburse Aggrieved Employees for such reasonable and necessary business expenses incurred. Accordingly, Ms. Koroleva was not reimbursed for these expenses. Because Ms. Koroleva is owed overtime compensation and expense reimbursement, Ms. Koroleva was not paid all of her wages upon termination. Further,

her paystubs did not accurately reflect her hours and expense reimbursement

This letter serves as notice of our intent to seek civil penalties pursuant to the Private Attorneys General Act (“PAGA”), Cal. Lab. Code §§ 2698 *et seq.*, on behalf of Ms. Koroleva as well as all similarly-situated Aggrieved Employees who worked for Cloudflare in the State of California at any time since January 10, 2024. Ms. Koroleva alleges that Cloudflare violated numerous provisions of the California Labor Code, including, but not limited to: §§ 201-204, 210, 218.5, 226, 226.3, 226.7, 510, 512, 558, 1174, 1174.5, 1194, 1198 and 2802, and provisions of the applicable Wage Order. Ms. Koroleva will seek all applicable civil penalties on behalf of herself and all similarly-situated Aggrieved Employees, including but not limited to, penalties pursuant to the aforementioned statutes and the applicable Wage Order.

The facts and claims contained herein are based on the information available at the time of this writing. Therefore, if through further review or informal or formal discovery, Ms. Koroleva becomes aware of additional compensation or penalties owed to her and other current or former Aggrieved Employees or of additional claims against Cloudflare, she reserves the right to revise these facts and/or add any new claims by amending this letter.

Based on the foregoing, Ms. Koroleva intends to file a civil action to pursue claims against Cloudflare and to seek PAGA remedies for these violations. Ms. Koroleva respectfully requests that the Labor & Workforce Development Agency notify her if it intends to investigate the above allegations pursuant to PAGA.

Thank you for your attention to this matter. Please direct all communications and correspondence to our office going forward. If you have any questions, please do not hesitate to contact us at 561-447-8888.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Paolo C. Meireles', written in a cursive style.

Paolo C. Meireles