

MOORADIAN LAW, APC

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JANUARY 23, 2026

VIA USPS CERTIFIED MAIL

Partners Personnel – Management
Services, LLC
3820 State St., Suite B
Santa Barbara, CA 93105
9589 0710 5270 2243 8619 40

Corporate Creations Network Inc.
Agent for Service of Process for Partners
Personnel – Management Services, LLC
7801 Folsom Boulevard, #202
Sacramento, CA 95826
9589 0710 5270 2243 8619 71

Potential Industries, Inc.
720 East E. Street
Wilmington, CA 90744
9589 0710 5270 2243 8619 57

Jessica Chen
Agent for Potential Industries, Inc.
720 East E. Street
Wilmington, CA 90744
9589 0710 5270 2243 8619 64

VIA ONLINE SUBMISSION

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814
www.dir.ca.gov

Re: *California Wage & Hour Violations*
Partners Personnel – Management Services, LLC &
Potential Industries, Inc.
LWDA Case Number: LWDA-CM-889076-22

To Whom It May Concern:

As you are aware, this office represents Omar Rios Romero with respect to Private Attorneys General Act (“PAGA”) claims that he is pursuing against Partners Personnel – Management Services, LLC (“Partners”) and Potential Industries, Inc. (“Potential”) (collectively hereinafter “Employers”) based upon their illegal wage and hour practices in the State of California

as to their non-exempt employees. This letter will serve to supplement the notice communicated on June 13, 2022, as required by Labor Code Section 2699.3.

Facts

Mr. Rios seeks to pursue PAGA claims on his own behalf and on the behalf of other exempt and non-exempt current and former employees of the Employers and are collectively hereinafter referred to as “Employees,” from March 3, 2020 to the present.

In addition to the practices notified of in the June 13, 2022 notice, EMPLOYERS have engaged in the following practices as to their non-exempt employees:

Failure to maintain accurate records - Labor Code sections 1198.5 and 1174(d)). Employers have adopted, and continue to adopt, a custom and practice of failing to maintain accurate records relating to Employees’ work periods, meal periods, total daily hours worked, and total hours worked per payroll period. Accordingly, Employers violated the Applicable IWO and California Labor Code sections 1198.5 and 1174(d).

Failure to pay reporting time - Labor Code section 1198 and the Applicable IWO. Employers have adopted, and continue to adopt, a custom and practice of failing to pay Employees half the usual or scheduled day’s work in an amount no less than two (2) hours nor more than four (4) hours at the Employee’s regular rate of pay for workdays in which Employees reported to work and were furnished less than half the usual or scheduled day’s work. Employers have also adopted, and continue to adopt, a custom and practice of failing to pay Employees for two (2) hours at the Employee’s regular rate of pay on days in which Employees were required to report for work a second time in one workday and were furnished less than two (2) hours of work upon the second reporting. Accordingly, Employers violated the Applicable IWO and Labor Code section 1198.

Conclusion

Please inform us if you intend to investigate this matter. We look forward to prompt administrative action so that the identified unlawful practices can be rectified. In the absence of such action, we intend to seek recovery of civil penalties pursuant to Labor Code Section 2698 et seq. for the above violations in the pending action entitled *Omar Rios Romero v. Partners Personnel – Management Services, LLC, et al.* (Los Angeles County Superior Case No.

22STCV22509). This will be in addition to violations set forth in the initial notice letter communicated on June 13, 2022. Should you require any additional information, do not hesitate to contact the undersigned.

Very truly yours,

MOORADIAN LAW, APC

/s/ Haik Hacopian

HAIK HACOPIAN

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