

WEBB LAW GROUP, APC
ATTORNEYS AT LAW

466 W. FALLBROOK AVENUE, SUITE 102
FRESNO, CA 93711
TELEPHONE: 559.431.4888
FACSIMILE: 559.821.4500
www.WebbLawGroup.com

LENDEN F. WEBB

Email: LWebb@WebbLawGroup.com

February 5, 2025

Via Online Filing and Certified U.S. Mail

LABOR WORKFORCE DEVELOPMENT AGENCY
ATTN: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Via Certified U.S. Mail

SECURITY ENFORCEMENT ALLIANCE, INC.
3431 Broadway St, Suite H-4
American Canyon CA, 94503

Via Certified U.S. Mail

SECURITY ENFORCEMENT ALLIANCE, INC.
c/o Juan Garcia
19350 Meekland Ave
Hayward, CA 94541

Via Certified U.S. Mail

SECURITY ENFORCEMENT ALLIANCE, INC.
c/o Anthony Blanco
312 Wallace Ave
Vallejo, CA 94590

Re: Current Employee Lance Hopkins.
Notice of Violations of California Labor Code Sections §§ 201, 202, 203,
266(a), 226.7, 510, 512, 1194, 1198, Applicable Industrial Welfare Commission
Wage Order(s), and Pursuant to California Labor Code Section 2699.5

To Whom It May Concern:

As Webb Law Group, APC represents the interests of **LANCE HOPKINS** (*hereinafter referred to as "Plaintiff"*), and other employees (*hereinafter "Aggrieved Employees"*)¹ in a pending class action lawsuit against **SECURITY ENFORCEMENT ALLIANCE, INC.** (*hereinafter referred to as "Defendant"*).

Plaintiff was employed by Defendant as a security guard from on or around November 2022 to on or about March 2024; then again from December 2024 to the present. Defendant

¹ Aggrieved Employees refers to all individuals who are or previously were employed with Security Enforcement Alliance in California

accurately classified Plaintiff as an hourly employee, non-exempt from receiving overtime wages and other related benefits. However, Defendant unlawfully failed to pay Plaintiff, and other Aggrieved Employees for all overtime hours worked. Defendant unlawfully failed to provide timely, legally mandated meal periods to Plaintiff and other Aggrieved Employees. As a consequence of the above-mentioned violations, Plaintiff asserts that Defendant failed to provide accurate wage statements to Plaintiff, and other aggrieved employees, in violation of labor code §266(a). Said conduct in addition to the foregoing, violated Labor Code §§ 201, 202, 203, 204, 226(a), 226.7, 510, 512, 1194, 1198. Business and Professions Code § 17200, and Industrial Welfare Commission Wage Order No. 4-2001, and is therefore actionable under California Labor Code §2699.3.

A true and correct copy of the Complaint that (i) identifies the alleged violations, (ii) details the facts and theories which support the alleged violations, (iii) details the specific work performed by Plaintiff, (iii) sets forth the people/ entities, dates, classifications, violations, events and actions which are at issue to the extent known to Plaintiff, and (iv) sets forth the illegal practices used by Defendant is attached hereto as **Exhibit A**.

This information provides notice to the Labor and Workforce Development Agency of the facts and theories supporting the alleged violations for the agency's reference. Plaintiff therefore incorporates the allegations of the attached Complaint into this letter as if fully set forth herein. If the agency needs any further information, please do not hesitate to ask.

This notice is provided to enable the Plaintiff, on behalf of himself and all other Aggrieved Employees to proceed with the Complaint against Defendant as authorized by California Labor Code § 2695, *et seq.* The proposed class action lawsuit consists of a class of other Aggrieved Employees working in California. As class counsel, our intention is to vigorously prosecute the class wide claims as alleged in the Complaint, and to procure civil penalties as provided by the Private Attorney General Statute of 2004 on behalf of Plaintiff and all aggrieved California employees and California Class Members.

Very truly yours,



Lenden F. Webb
WEBB LAW GROUP, APC

LFW:axl

enc: Exhibit A - Complaint