



H A U L K & H E R R E R A L L P

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March 31, 2025

VIA ONLINE SUBMISSION

Labor & Workforce Development Agency
Attn: PAGA Administrator
455 Golden Gate Avenue, 9th Floor
San Francisco, California 94102

Re: **Private Attorney General Act Notice**

Dear PAGA Administrator:

This firm represents Jehan Sparks (“**Plaintiff**”) with respect to Plaintiff’s claims against Meta Platforms, Inc. (“**Meta**”).

The purpose of this letter is to comply with Labor Code section 2699.3, which requires an aggrieved employee to notify their employer and the Labor & Workforce Development Agency (“**LWDA**”) of the provisions of the Labor Code that the employer has allegedly violated before filing a civil claim under California’s Labor Code Private Attorneys General Act (“**PAGA**”).

As used herein, the term “**Aggrieved Employees**” refers to Plaintiff and to all current and former employees of Defendant who have worked for Defendant in the State of California. Plaintiff has suffered each of the Labor Code and Wage Order violations asserted herein.

SUMMARY OF FACTS

Jehan Sparks holds a Ph.D. in Social Psychology and, until recently, was a Senior Qualitative User Experience Researcher at Instagram. Dr. Sparks worked at Instagram from October 2022 to March 2024 before briefly leaving. She was rehired on June 10, 2024, in the same role but on a different team, transitioning from the Business Opportunities team to the Communities Lab team.





On January 10, 2025, Meta announced the immediate termination of its diversity, equity, and inclusion (DEI) programs in a post on Workplace, the company's internal communication platform. The post stated that Meta was discontinuing hiring programs, representation goals, supplier diversity efforts, and DEI-specific training.

Meta's retraction of its DEI policies, and change in working conditions, reflected Meta and its Chief Executive Officer's abandonment of the company's purported values and their swift embrace of Donald J. Trump. Indeed, this decision emanated from the very top of the company. Chief Executive Officer Mark Zuckerberg demonstrated his personal fealty to President Trump by co-hosting his inauguration party on January 20, 2025 and having Meta "donate" \$1,000,000 to his inauguration funds.

Meta's January 10, 2025, post was publicly accessible to employees and contained no proprietary or sensitive company information, distinguishing it from other internal communications, such as financial reports. Concerned about how the policy changes might impact her, Dr. Sparks privately shared the post with her family via iMessage.

In the weeks that followed, a copy of the DEI report was shared with the press and Meta initiated an investigation to determine who had discussed the new workplace policies and procedures and/or shared the information contained in the policy memo. Meta had no issue with reversing course on its employment policies; however, it wished to keep those changes secret from the public.

On or about January 30, 2025, Meta's Chief information Officer Guy Rosen published a memorandum stating, in part, as follows: "When information is stolen or leaked, there are repercussions beyond the immediate security impact. Our teams become demoralized and we all waste time that is better spent working on our products and toward our goals and mission."

On February 25, 2025, Sparks was summoned for an interview regarding the investigation. The meeting lasted 45 minutes and was conducted by two investigators from Meta's internal team. During the interview, Sparks explained her concerns about how the policy changes might impact her job and acknowledged that she had shared the post privately with her family while seeking emotional support. She had nothing to hide.





Immediately following her February 25, 2025, interview, Sparks was cut off from all employee communication channels, including Workplace and internal messaging systems. Without prior notice, she was escorted out of the office, and her work belongings were taken. She was not informed of the outcome of the investigation at that time.

On February 27, 2025, two days after being removed from the office, Sparks received a formal notification of the investigation's outcome. Later that morning, at approximately 9:30 AM, Sparks was terminated. Her manager read from a scripted termination statement and became visibly emotional, even crying while delivering the message.

[REDACTED]

[REDACTED]

Instead of receiving the protections she was entitled to, she was unlawfully fired for speaking out about workplace conditions, in direct violation of California Labor Code § 232.5. [REDACTED]

[REDACTED]

Meta's actions against Sparks are not isolated. Other similarly aggrieved employees have also been affected by the company's unlawful enforcement of policies designed to suppress employee communications about workplace conditions. By retaliating against Sparks and other similarly affected employees for simply discussing workplace policies and their impact, Meta has engaged in a broader pattern of unlawfully silencing employees, in direct violation of California Labor Code § 232.5.

Plaintiff alleges that Defendant engaged in a pattern of knowingly violating numerous Labor Code sections. In particular, Defendant has violated California's labor code by:

California Labor Code § 232.5: by discharging or retaliating against Plaintiff and other employees for disclosing information about the employer's working conditions, including workplace policies and their potential impact on employees, which is expressly protected under this provision.



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Plaintiff has suffered the violations alleged herein. This notice is based on the facts currently known to Plaintiff and is made without prejudice to Plaintiff's right to seek all available remedies for any and all additional violations that may subsequently be discovered or identified.

Please advise this office within 60 days of the post-mark date of this notice whether the Labor & Workforce Development Agency intends to investigate the above-noted Labor Code and Wage Order violations. Thank you for your attention to this matter.

Very truly yours,

Jose M. Herrera

cc: Meta Platforms, Inc., *via Certified Mail/Return Receipt Requested*