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December 24, 2015

Via Certified Mail: 7015 0640 0001 9770 8423

Return Receipt Requested

Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612

Via Certified Mail: 7015 0640 0001 9770 8416

Return Receipt Requested

Christina, Jennifer, Jessica Enterprises, Inc.
3777 Long Beach Boulevard, Suite 200
Long Beach, CA 90807

Re: **Salazar v. Christina, Jennifer, Jessica Enterprises Inc.**

**NOTICE OF LABOR CODE VIOLATIONS PURSUANT TO
CALIFORNIA LABOR CODE § 2699 et seq.**

To: California Labor and Workforce Development Agency and Christina, Jennifer, Jessica Enterprises Inc.

From: Javier Salazar, on behalf of himself and aggrieved employees who were subject to the employer's wage and hour policies as set forth below.

Factual Statement

Please note that this firm, the Mahoney Law Group, APC, represents the interests of Javier Salazar ("Plaintiff" or "Mr. Salazar"), who intends to file a complaint alleging various Labor Code violations and seeking civil penalties under the Private Attorneys General Act of 2004, Labor Code § 2698 et seq. (hereinafter "PAGA") on behalf of himself and other aggrieved employees.

Theories of Labor Code Violations and Remedies

Mr. Salazar alleges that Christina, Jennifer, Jessica Enterprises Inc. ("Defendant") violated various sections of the Labor Code, including §§ 201 and 202, et seq., by failing to compensate Mr. Salazar and all other aggrieved employees for hours worked, including, but not limited to, regular and overtime hours.

Ms. Salazar and other aggrieved employees never received the proper compensation for all overtime hours worked, in violation of Labor Code §§ 510 and 1194, as they were paid either at the regular pay rate or not at all for all hours worked in excess of eight (8) hours in a day or more than forty (40) hours in a workweek. Violations of Labor Code §§ 510 and 1194 are actionable under PAGA.

Mr. Salazar will also allege that Defendant violated Labor Code § 226 as part of its ongoing business practice, by failing to provide their employees with proper and understandable itemized wage statements, as all hours worked were either not reflected or reflected inaccurately. Mr. Salazar will also allege that Defendant issued facially unlawful wage statements to its employees, including Mr. Salazar, in violation of Labor Code § 226.

In addition, Mr. Salazar will allege that Defendant violated various sections of the Labor Code, including §§ 226.7 and 1198, due to its ongoing business practice of preventing, discouraging, and/or dissuading Mr. Salazar and other aggrieved employees from taking rest breaks of not less than ten (10) minutes. Defendant's failure to provide rest breaks to all aggrieved employees is actionable under PAGA.

Mr. Salazar will further allege that Defendant violated Labor Code § 226.7 by failing to provide Mr. Salazar and other aggrieved employees with legally compliant meal breaks of not less than thirty (30) minutes. Defendant violated the aforementioned Labor Codes by knowingly and regularly failing to provide sufficient staff coverage in order to relieve Mr. Salazar and other aggrieved employees of their duties so that they can take a lunch break. Due to the imposition of a heavy workload and Defendant's failure to provide adequate staff coverage, Mr. Salazar and other aggrieved employees' lunches were often interrupted with work duties. As a result of Defendant's violations of Labor Code § 226.7, Mr. Salazar and other aggrieved employees are entitled to damages equal to one (1) hour of wages per missed meal and rest period.

Based on Defendant's failure to pay overtime, meal period premiums, and rest period premiums, Mr. Salazar will allege in his complaint that Defendant violated Labor Code § 203, since Mr. Salazar and his co-workers did not receive all their wages in a timely fashion as a result of Defendants' unlawful policies and procedures.

Again, based on Defendant's failure to pay overtime, meal period premiums, and rest period premiums, Mr. Salazar will also allege that Defendant violated Labor Code §§ 201, 202, and 203, due to its uniform policy, practice and procedure of willfully failing to pay the earned and unpaid wages of all former employees.

Furthermore, Defendant failed to keep accurate payroll records, wherein Mr. Salazar and his co-workers were denied all wages owed, entitling them to penalties pursuant to Labor

Code §§ 226(a), 226(e) and 1174. Defendants' failure to keep accurate payroll records is also actionable under Labor Code §2699.5. Thus, Mr. Salazar and his co-workers will allege a cause of action for this violation of the Labor Code and the related PAGA penalties as well.

Mr. Salazar is bringing this lawsuit on behalf of himself and all other aggrieved employees who were employed by Defendant. Please advise if the LWDA has any objection to Mr. Salazar including PAGA claims in his complaint. We look forward to your response. Please feel free to contact our office if you have any comments or questions.

Sincerely,



 Sean M. Blakely
MAHONEY LAW GROUP, APC