

Proof of Service by First-Class Mail – Civil (POS-030 Equivalent)

I, Sean T. Cason, declare that:

I am over the age of 18 and not a party to this action. My address is [REDACTED]

On July 21, 2025, I served the following document(s):

- Amended PAGA Notice

I served the document(s) by enclosing them in a sealed envelope and placing the envelope for collection and mailing on the date and at the place shown in item 4 following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The document(s) were mailed to the following person(s):

C T Corporation System (Agent for M Palm Springs LLC)
330 N Brand Blvd, Suite 700, Glendale, CA 91203

Registered Agents Inc. (Agent for M Hotels LLC)
1401 21st St., Sacramento, CA 95811

Incorp Services, Inc. (Agent for Sundream Investment LLC)
17888 67th Court North, Loxahatchee, FL 33470

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: July 21, 2025

Signature: Sean T. Cason

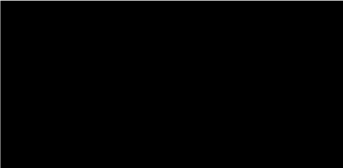
Printed Name: Sean T. Cason

Private Attorneys General Act (PAGA) Notice

Submitted Pursuant to Labor Code §2699.3

From:

Jacob D. Steward



To:

M Palm Springs, LLC
dba Casa Oliver Hotel & Resort
535 S. Warm Sands Dr.
Palm Springs, CA 92264

M Hotels, LLC
535 S. Warm Sands Dr.
Palm Springs, CA 92264

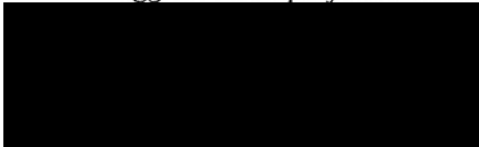
Sundream Investments, LLC
535 S. Warm Sands Dr.
Palm Springs, CA 92264

Date of Violation Period:
December 2, 2024 – Present (and ongoing)

I. Complainant and Aggrieved Employees

I, Jacob D. Steward, am an aggrieved employee under Labor Code §2699(c). I submit this notice on behalf of myself and other current and former employees who have been subjected to ongoing, systemic, and willful Labor Code violations while employed by the above entities at the Casa Oliver Hotel & Resort.

Known aggrieved employees include but are not limited to:



II. Description of Labor Code Violations

The employer has engaged in pervasive, intentional violations of the California Labor Code. These are not administrative oversights, but calculated practices meant to suppress wages, silence employees, and avoid legal compliance. The violations include:

A. Wage & Hour Violations

- Labor Code §§ 510, 1194 – Systematic failure to pay lawful overtime.
- Labor Code §§ 1182.12, 1194 – Minimum wage underpayments to multiple employees.
- Labor Code §1197.5 – Violation of California Equal Pay Act. The employer grossly underpays its General Manager (\$29/hr) despite requiring full operational responsibility, no support staff, and advanced duties across departments. This is well below industry norms and reflects discriminatory and exploitative compensation practices.
- Labor Code §§ 204, 1194 – Requiring employees to work without pay or accurate tracking of hours.
- Labor Code §§ 226.7, 512 – Deliberate denial of legally mandated meal and rest periods, compounded by the absence of any employee-only break areas. Breaks are not duty-free and are regularly interrupted by guest demands or managerial control, in direct violation of California law and IWC Wage Order No. 5.
- Labor Code §2802 – Refusal to reimburse mandatory business expenses including technology infrastructure, supplies, personal devices, and labor performed offsite.
- Labor Code §226 – Wage statements are incomplete, inaccurate, and frequently missing critical data.
- Labor Code §1174(d) – Employer fails to retain payroll records or comply with statutory retention requirements.
- Labor Code §§ 221, 224 – Wages have been unlawfully withheld or misclassified without employee consent or legal justification.
- Labor Code §§ 201–203 – Upon separation, employees were not paid all wages owed, triggering daily penalties.
- Labor Code §2810.5 – The employer never issued required written new hire disclosures. No employee received a Wage Theft Prevention Act notice or any document outlining terms of employment.

B. Health and Safety Violations

- Labor Code §§ 6400, 6402 – The work environment is unsafe, unsanitary, and lacks hazard correction protocols.
- Labor Code §1207 – Required workplace notices are not posted or maintained.
- Labor Code §226 – Employer failed to visibly post basic wage and hour rights in employee areas.

C. Retaliation and Whistleblower Violations

- Labor Code §1102.5 – Employer has retaliated against employees who raise concerns about any unlawful behavior or unsafe practices.
- Labor Code §98.6 – Employees have been punished for asserting basic legal rights.

- Labor Code §2922 – Constructive discharge was used as a weapon to intimidate, isolate, and terminate whistleblowers.
- Labor Code §6310 – Employer retaliated against those reporting OSHA or health-related violations.
- Civil Code §§ 45, 46 – Employer engaged in defamation and false accusations, including police involvement, designed to discredit former employees.

D. Immigration and Visa-Related Misconduct

- The employer has failed to verify the citizenship or legal work status of multiple staff members, maintaining no transparent I-9 records.
- There is reason to believe that foreign investors or owners may be operating under visa programs such as EB-5 and misrepresenting job creation or employee classification.
- The lack of lawful wage records, payroll, or onboarding documentation strongly suggests potential visa fraud or misuse designed to fabricate job creation metrics or suppress reportable wage obligations.
- These actions violate federal and state law and reflect an intentional pattern of deception designed to exploit labor while evading regulatory scrutiny.

III. Employer Conduct and Management Accountability

Jeff Mercier, Lori Principe, and Kevin Mercier are not just aware of these violations — they are responsible for creating, enforcing, and benefiting from them. Their coordinated efforts to avoid lawful employment practices, intimidate dissenting employees, and retaliate against whistleblowers make them personally complicit in nearly every statutory violation detailed in this Notice.

IV. Relief Sought

Maximum civil penalties under PAGA, reimbursement of all unpaid wages and expenses, attorney's fees where applicable, injunctive relief, and any additional remedies deemed just and proper.

V. Other Aggrieved Employees

Additional aggrieved employees have been identified and are willing to testify or join in future litigation. The employer's failure to keep records has made full identification difficult, but the pattern of violations is consistent across job roles.

This PAGA Notice will be served via Certified Mail (Return Receipt Requested) to the following Registered Agents:

VI. Service of Notice

This PAGA Notice will be served via Certified Mail (Return Receipt Requested) to the following Registered Agents:

■ M Palm Springs, LLC

Registered Agents Inc.
1309 Coffeen Avenue, Suite 1200
Sheridan, WY 82801

■ M Hotels, LLC

Cloud Peak Law, LLC
1095 Sugar View Drive, Suite 500
Sheridan, WY 82801

■ Sundream Investments, LLC

NRAI Services, Inc.
1200 South Pine Island Road
Plantation, FL 33324

VII. Alter Ego Liability and Piercing the Veil

The limited liability companies named herein — M Palm Springs, LLC, M Hotels, LLC, and Sundream Investments, LLC — function not as distinct corporate entities, but as alter egos of their individual managing members: Jeff Mercier, Lori Principe, and Kevin Mercier.

There exists a unity of interest and ownership between these individuals and the LLCs such that any separation between entity and owner has ceased to exist. The named individuals commingle business and personal funds, exercise unilateral control over employment and operational decisions, and disregard corporate formalities.

Employees, including the complainant, were provided no corporate onboarding, no formal employer identification, no access to wage or HR personnel, and no mechanism to distinguish between the LLCs and the individuals acting in concert.

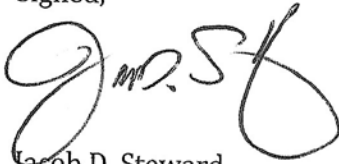
This disregard for the legal separateness of the entities and their owners has facilitated widespread wage theft, retaliation, and legal noncompliance. The complainant therefore asserts that these entities are shells operated for improper purposes and reserves the right to pursue direct personal liability against the managing members under the alter ego and veil-piercing doctrines in equity and law.

VIII. Certification

VI. Certification

I certify under penalty of perjury under the laws of the State of California that the information provided is true and correct.

Signed,

A handwritten signature in black ink, appearing to read "J.D. Steward". The signature is stylized with a large, looping "J" and "S".

Jacob D. Steward

Date: July 21, 2025

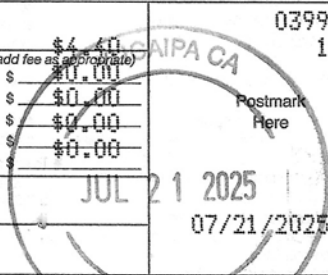
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U.S. Postal Service™
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Sacramento, CA 95811

Certified Mail Fee	\$5.30	0399
Extra Services & Fees (check box, add fee as appropriate)	\$4.40	10
☐ Return Receipt (hardcopy)	\$0.00	
☐ Return Receipt (electronic)	\$0.00	
☐ Certified Mail Restricted Delivery	\$0.00	
☐ Adult Signature Required	\$0.00	
☐ Adult Signature Restricted Delivery	\$0.00	
Postage	\$1.07	
Total Postage and Fees	\$10.77	



Sent To: **REGATELLO ARIZONA INC.**
 Street and Apt. No., or PO Box No.: **1401 21ST ST.**
 City, State, ZIP+4®: **SACRAMENTO, CA 95811**

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

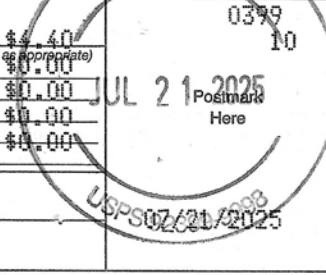
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Loxahatchee, FL 33470

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Sent To: **INCOMP SERVICES INC.**
 Street and Apt. No., or PO Box No.: **17833 6TH COURT NORTH**
 City, State, ZIP+4®: **LOXAHATCHEE, FL 33470**

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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Glendale, CA 91203

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Total Postage and Fees	\$10.77	



Sent To: **CT CORPORATION SYSTEM**
 Street and Apt. No., or PO Box No.: **330 N. BRAND BLD STE 700**
 City, State, ZIP+4®: **GLENDAL, CA 91203**

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions