

Advocates for Workplace Fairness

May 12, 2025

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

Re: PAGA Notice of California Labor Code Claims against Snap Inc. and PSA Risk Management Services Inc.

Dear PAGA Administrator:

Outten & Golden LLP represents Babylonia Karaman, who worked as a non-exempt hourly employee for Snap Inc. (“Snap”) from approximately July 2021 until approximately January 2024 in California. The purpose of this letter is to provide written notice of the specific alleged violations of the Labor Code by Snap and PSA Risk Management Services Inc. (“PSA”), including the facts and theories to support the violation(s), pursuant to Labor Code section 2699.3.

Ms. Karaman alleges that Snap and PSA (together, the “Snap Entities”) failed to pay her and other similarly situated Aggrieved Employees¹ overtime as required by California law, including that the Snap Entities have failed to include the value of supplemental renumeration in the calculations of Aggrieved Employees’ “regular rates,” as defined by the California Labor Code for purposes of computing overtime wages owed. As a result of her employment with the Snap Entities, Ms. Karaman alleges that they violated California law by failing to: (1) pay Aggrieved Employees proper compensation for all hours worked, including timely overtime wages, in violation of Labor Code sections 204, 210, 510, 558, 1194, 1197, and 1198; (2) provide Aggrieved Employees required meal breaks per Labor Code sections 512 and 226.7; (3) pay Aggrieved Employees timely wages upon separation as required by Labor Code sections 201, 202, and 203; and (4) furnish Aggrieved Employees with legally sufficient wage statements, as required by Labor Code section 226.

This letter serves as notice of our intent to seek civil penalties pursuant to the Private Attorneys General Act (“PAGA”), Cal. Lab. Code §§ 2698, *et seq.*, on behalf of Ms. Karaman and similarly situated Aggrieved Employees who worked for the Snap Entities in the State of California to the fullest extent allowed by law. Ms. Karaman will seek all applicable civil penalties on behalf of herself and all similarly situated Aggrieved Employees, including but not limited to penalties pursuant to the aforementioned violations.

¹ “Aggrieved Employees” include all current and former non-exempt employees of Snap and PSA who worked in California between July 15, 2023 and August 1, 2024 (the “PAGA Period”) and (1) had a restricted stock unit (“RSU”) award that vested during the PAGA Period, and (2) worked overtime between the date that one or more of their RSU awards was granted and the date that the RSU award vested during the PAGA Period.

Pursuant to Labor Code section 2699.3(a)(1)(A), a copy of this letter is being sent via certified mail to the following:

Snap Inc.
PSA Risk Management Services Inc.
c/o Crystal Silva
2772 Donald Douglas Loop N
Santa Monica, CA 90405
csilva2@snapchat.com

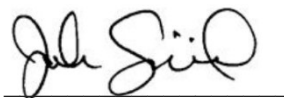
And a copy of this letter is being sent via email to the Snap Entities' counsel:

Megan Cooney, Esq.
Gibson, Dunn & Crutcher LLP
3161 Michelson Drive, Suite 1200
Irvine, CA 92612
mcooney@gibsondunn.com

The facts and claims contained herein are based on the limited information available at the time of this writing. Therefore, if through further review or informal or formal discovery, Ms. Karaman becomes aware of additional compensation or penalties owed to her and other Aggrieved Employees or of additional claims against Snap, she reserves the right to revise these facts and/or add any new claims by amending this letter.

Thank you for your attention to this matter. Please direct all communications and correspondence to our office going forward. If you have any questions, please do not hesitate to contact us at 415-638-8800.

Sincerely,

A handwritten signature in black ink, appearing to read "Jahan S. Sagafi", written over a horizontal line.

Jahan S. Sagafi