



May 5, 2025

VIA ELECTRONIC MAIL

PAGAfilings@dir.ca.gov

Re: PAGA CLAIM NOTICE

Michael Peterson, an individual v. The Maimon Group, Inc; Tal Maimon et al

To Whom It May Concern:

Please be advised that this law firm represents Michael Peterson (“Plaintiff” or “Mr. Peterson”) in claims arising from his employment with The Maimon Group, Inc., et al., Tal Maimon, and Does 1 through 50 (“Defendants”). Plaintiff is an “aggrieved employee” as defined by Labor Code §§ 2699, *et seq.*, due to Defendants’ violations of the Labor Code as set forth below. The purpose of this letter is to comply with Labor Code § 2699.3, which requires aggrieved employees to notify their employer and the Labor and Workforce Development Agency (“LWDA”) of the specific provisions of the Labor Code allegedly violated.

Plaintiff worked for Defendants since approximately February 2024 to September 18, 2024. Defendants are located at 640 S. San Vincente Blvd. Suite 310 Los Angeles, CA 90048.

During his employment with Defendants, Plaintiff was subjected to numerous violations of the California Labor Code. Despite often working every day of the week, Defendants failed to implement any time tracking system and misclassified Mr. Peterson as a salaried employee. Thus, Plaintiff worked 10-12 hour days and over 5 days a week without being paid for all hours worked.

Defendants committed the following violations of the Labor Code, and the applicable Industrial Welfare Commission Wage Order (“Wage Order”):

Misclassification of Non-Exempt Employees

Defendants violated Labor Code §§ 510, 1194, 1197, and 1198 by willfully misclassifying Plaintiff as an exempt employee to avoid paying overtime wages and other benefits required by California law. Despite performing non-exempt duties, Defendants improperly classified these employees as exempt to evade their wage and hour obligations.

Marcos Gudino v. Asphalt Professionals, Inc., et al.

May 5, 2025

Pursuant to Labor Code § 2699.3(a)(2)(A), please notify us and Defendants if the LWDA intends to investigate these alleged violations of the Labor Code. Please contact me should you require additional information.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Y. Ryu', with a stylized flourish extending to the right.

LOYR, APC

Young W. Ryu, Esq.
Zachariah E. Moura, Esq.
Sandy Gonzalez, Esq.
Kee S. Mah, Esq.
Harley M. Phleger, Esq.

cc: (VIA Electronic Mail)

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