

Kaveh S. Elihu



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June 30, 2025

VIA CERTIFIED U.S. MAIL & RETURN RECEIPT REQUESTED

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Department of Industrial Relations
California Labor & Workforce Development Agency
800 Capitol Mall, Suite 5000
Sacramento, CA 95814
[Notice Filed Online via LWDA/PAGA Filing Portal]

SF Markets, LLC
c/o CSC Lawyers
2710 Gateway Oaks Dr., Ste. 150N
Sacramento, CA 95833

Sprouts Farmers Market, LLC
613 S Harmon St.
Santa Ana, CA 92704

Re: Joseph Oviedo v. SF Markets, LLC et al.

PRIVATE ATTORNEY GENERAL ACT (“PAGA”) NOTICE
Pursuant to Labor Code §§ 2699 *et seq.*

Dear PAGA Administrator:

This office represents Joseph Oviedo, a former employee of Sprouts Farmers Market, LLC dba SF Markets, LLC, Sprouts Farmers Market Holdings, LLC, Sunflower Farmers Markets, Inc. and Henry’s Holdings, LLC with respect to his retaliation and wrongful termination claims against Sprouts Farmers Market, LLC et al. (“Sprouts”), as well as claims for civil penalties under the Private Attorneys General Act. Pursuant to *Labor Code* §§ 2699 *et seq.* and 2699.3, this letter serves as written notice to the Labor & Workforce Development Agency (“LWDA”) (as well as copying Mr. Oviedo’s former employers) of the specific provisions of the Labor Code alleged to have been violated, including the facts and theories supporting those alleged violations.

Mr. Oviedo, along with other similarly situated current and former employees of Sprouts, was subjected to unlawful employment practices in violation of the Labor Code. These practices include but are not limited to: *Labor Code* §§ 1102.5, 6310, and 232.5.

Mr. Oviedo worked out of the Sprouts location at 915 North La Brea Avenue, Los Angeles, California 90046. He alleges he was retaliated against and wrongfully terminated in violation of California *Labor Code* §§ 1102.5, 6310, 232.5, at least in part, due to reporting unsafe work conditions on or around April 26, 2025. On or around April 26, 2025, Mr. Oviedo was physically attacked by an Instacart vendor operating within the store premises. He attempted to de-escalate the situation and walk away but the Instacart worker continued to aggressively pursue and confront him. Other Sprouts employees had to physically intervene to prevent further escalation.

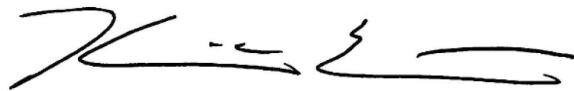
Following the incident, Mr. Oviedo immediately reported the attack to his Manager. He and his Manager reviewed the store surveillance footage together. Mr. Oviedo explicitly requested a copy of the footage because he wanted to file a police report. Despite the severity of the incident, management failed to facilitate or allow the filing of a police report. Instead, Mr. Oviedo's Manager responded with vague deferral, stating "we'll see if that's what we need to do."

Furthermore, Mr. Oviedo raised a safety concern regarding no managers being present on the store's floor at the time of his attack, which left himself and other aggrieved employees vulnerable in an emergency situation. On the date Mr. Oviedo raised these concerns, he was suspended pending an internal investigation. On or around May 3, 2025, Mr. Oviedo was formally terminated. This conduct by Mr. Oviedo's employers plainly violated California Labor Code §§ 232.5, 1102.5 and 6210.

In addition to Mr. Oviedo's individual wrongful termination/retaliation claims, Mr. Oviedo intends to pursue civil penalties under PAGA in a representative action on behalf of himself and other aggrieved employees, should the LWDA decline to investigate. Pursuant to Labor Code section 2699(a)&(f), and by way of this letter, Claimant hereby raises to the LWDA specified PAGA violations suffered by he and the other similarly situated current and former, similarly situated, non-exempt employees of his former employers in California.

Submitted concurrently with this letter is the required filing fee of \$75.00, per the PAGA requirements. Thank you for your assistance and cooperation in this matter. Please contact our office should you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Kaveh S. Elihu". The signature is fluid and stylized, with a long horizontal stroke at the end.

KAVEH S. ELIHU, ESQ.
EMPLOYEE JUSTICE LEGAL GROUP, P.C.

**PROOF OF SERVICE
STATE OF CALIFORNIA,
COUNTY OF LOS ANGELES**

I reside in the county of Los Angeles, State of California, I am over the age of eighteen and not a party to the within action; my business address 1001 Wilshire Blvd., Los Angeles, California 90017. On the date shown below, I served the foregoing document, described as:

1. Private Attorney General Act Notice.

On the intended parties by placing the true copies thereof in a sealed envelope addressed to:

SF Markets, LLC
c/o CSC Lawyers
2710 Gateway Oaks Dr., Ste. 150N
Sacramento, CA 95833

Sprouts Farmers Market, LLC
613 S Harmon St.
Santa Ana, CA 92704

I am "readily familiar" with the firm's practices of collection and processing correspondence for mailing. Under that practice it would be deposited with the U. S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on the motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of the deposit for mailing an affidavit of service thereof.

Executed on June 30, 2025, at Los Angeles, California.

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

Name: Deisi Alvarado

Signature: Deisi Alvarado