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June 27, 2025

VIA CERTIFIED U.S. MAIL & RETURN RECEIPT REQUESTED
7020-1290-0001-2924-3037

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]

Wallcraft Drywall, Inc.
c/o James A. Bowles, Esq.
One California Plaza
300 S. Grand Ave., 37th Fl.
Los Angeles, CA 90071

Re: Sergio Ramirez Alonso v. Wallcraft Drywall, Inc., et. al
PRIVATE ATTORNEY GENERAL ACT ("PAGA") NOTICE

Dear Madam/Sir:

My firm has been retained by Sergio Ramirez Alonso concerning his retaliation and wrongful termination action against Wallcraft Drywall, Inc. I am writing this letter to the Labor & Workforce Development Agency ("LWDA") to exhaust his administrative remedies pursuant to *Labor Code* §§ 2699 et seq. and 2699.3.

Mr. Ramirez Alonso worked out of Wallcraft Drywall, Inc., jobsite located at 2910 N. San Fernando Road, Los Angeles, California 90065 as a general laborer who constructed housing for Defendant's benefit. Mr. Ramirez Alonso claims he was retaliated against and wrongfully terminated in violation of *Labor Codes* §§ 232.5, 1102.5, and 6310, at least in part, due to his complaints to his supervisor and human resources regarding wage violations under *Labor Codes* §§ 204, 1197, 226.7, 201-203, 226, 2802, and 558.1, and his requests for Defendant to follow established health and safety codes implemented by the Occupational Safety and Health Administration. More specifically, Mr. Ramirez Alonso worked under Defendant and engaged in construction work, particularly handling drywall, without the proper equipment including, but not limited to, masks, gloves, helmets, and goggles. Mr. Ramirez Alonso complained to his supervisor and/or manager regularly, but his supervisor and/or manager refused to address his complaints each time by stating that they do not provide such protective equipment to their employees. This resulted in Mr. Alonso Ramirez handling chemicals with his bare hands and getting debris in his eyes regularly up until he was able to purchase safety equipment at his own expense. With regard to his complaints pertaining to inaccurate wages, Mr. Ramirez Alonso consistently complained about inaccurate wage statements. Mr. Ramirez Alonso's supervisor notated his work hours incorrectly, which resulted in his actual paycheck undercompensating him in comparison to the actual hours worked. Regardless of the amount of times Mr. Ramirez

Alonso complained about the lack of health and safety protocols being implemented at his job site and his inaccurate wage statements, Mr. Ramirez Alonso's complaints were never addressed. Instead, rather, Mr. Ramirez Alonso was retaliated against and wrongfully terminated on or about September 23, 2024, at least in part due to these complaints.

Mr. Ramirez Alonso is preparing to file a lawsuit with the Los Angeles Superior Court civil claims, including those for retaliation and wrongful termination as set forth by §§ 232.5, 1102.5 & 6310, and wage violations as set forth by §§ 204, 1197, 226.7, 201-203, 226, 2802, and 558.1, among other claims. The purpose of this letter is to find out if the LWDA intends to investigate our client's allegations of Violations of *Labor Code* §§ 232.5, 1102.5, 6310, 204, 1197, 226.7, 201-203, 226, 2802, and 558.1, and the potential civil penalties specified by *Labor Code* §§ 1102.5(f), 1103, and 2699(g)(1).

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. Should you have any questions, please contact me at (213) 382-2222.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erika', with a stylized flourish at the end.

ERIKA ABTAHI, ESQ.
EMPLOYEE JUSTICE LEGAL GROUP

**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:

Wallcraft Drywall, Inc.
c/o James A. Bowles, Esq.
One California Plaza
300 S. Grand Ave., 37th Fl.
Los Angeles, CA 90071

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 27, 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: Kimberly Lopez

Signature: Kimberly Lopez