



AMANDA B. WHITTEN
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(559)494-4913 DIRECT

July 29, 2025

Attn: PAGA Administrator
1515 Clay Street, Suite 801
Oakland, California 94612

Re: Ashlee Soto

Dear Sir/Madam:

This letter shall serve as notice to your agency of Labor Code violations, which is a prerequisite to commencing a private civil action.

From on or about July 1, 2017, until on or about June 20, 2025, Ashlee Soto was employed by Abercrombie & Fitch Stores, Inc., herein referred to as ("Employer") ultimately in Santa Clara County. Her last position was Store Manager.

In or about June of 2025, Ms. Soto was fraudulently induced to relocate from Texas to California with the promise that there was a job for her in Santa Clara County. On or about June 20, 2025, after Ms. Soto relocated, in reliance on her employer's representation, she was terminated.

This conduct violated Labor Code section 970.

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Ms. Soto will file a civil action for damages, attorneys' fees, and costs pursuant to the PAGA.

Sincerely,

BRYANT WHITTEN, LLP

A handwritten signature in blue ink, appearing to read 'A. Whitten', with a horizontal line extending to the right.

AMANDA B. WHITTEN

ABW/cjc

Enclosure

cc: Ashlee Soto

Agent for Service of Process for Abercrombie & Fitch