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VIA ONLINE SUBMISSION: <https://dir.govfa.net/411>

California Labor and Workforce Development Agency
800 Capitol Mall, Suite 5000
Sacramento, CA 95814

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Attn: Alexander Freedman
Odyssey Agricultural Development, LLC
Odyssey Agricultural Holdings, LLC
Odyssey Insights, Inc.
6100 Wilshire Blvd
Los Angeles, CA 90048

Valley Agricultural Holdings, LLC
1702 Robertson Blvd., Suite 356
Los Angeles, CA 90035

Carlos Ojeda
Jon David
418 W. Belmont Ave
Mendota, CA 93640

***Re: Labor and Workforce Development Agency Required Notice of Private Attorneys
General Act Claim for Labor Code Violations***

Dear Labor and Workforce Development Agency:

Pursuant to Section 2699.3 of the Labor Code Private Attorneys General Act ("PAGA"), this letter shall serve as written notice of a claim for civil penalties by Jose Beltran and others similarly situated, against their former employer Odyssey Agricultural Development, LLC, Insights, Inc., Odyssey Agricultural Holdings, LLC, and Valley Agricultural Holdings, LLC ("Defendants"), and their agents, managers, supervisors, and/or owners Carlos Ojeda and Jon David—including, without limitation, Odyssey Insights, Inc., Chief Executive Officer Aaron Mamann (collectively "Individual Defendants")

Jose Beltran intends, as an aggrieved employee, to file a civil action which, *inter alia*, will assert claims against Defendants for penalties under PAGA on behalf of himself and all other similarly situated employees. In the action, Jose Beltran intends to assert that Odyssey Agricultural Development, LLC, Insights, Inc., Odyssey Agricultural Holdings, LLC, and Valley Agricultural Holdings, LLC (“Defendants”), and their agents, managers, supervisors, and/or owners Carlos Ojeda and Jon David—including, without limitation, Odyssey Insights, Inc., Chief Executive Officer Aaron Mamann (collectively “Individual Defendants”) liable under PAGA as employers for the following violations of the Labor Code, among others.

Violations of Labor Code Sections 201, 202, 206.5, 221, 226.2, 226.7, 512, 558, 1174, 1194.

Based on information and belief, the Individual Defendants possessed full authority to establish and execute the unlawful wage and hour practices detailed below. Accordingly, the Individual Defendants had actual or constructive notice of all violations described herein and failed to remedy or prevent such violations. Aggrieved Employee seeks to pursue a PAGA claim on behalf of the State of California and all other current and/or former non-exempt employees who have worked for Defendants in California.

Additionally, pursuant to California Labor Code sections 210, 558, 558.1, 1197.1, 2699(f) and other applicable Labor Code provisions, please consider this formal notice to Defendants and all persons acting on Defendants' behalf, including agents, managers, supervisors, and/or owners Carlos Ojeda and Jon David who controlled and caused violations of any California Labor Code provision or Wage Orders during the applicable time period through establishing unlawful policies, implementing unlawful policies, or failing to remedy unlawful policies.

This investigation request and notice of California Labor Code violations addresses the systematic failure by Defendants to compensate current and former California non-exempt employees in accordance with provisions established in the California Labor Code and Wage Orders issued by the Industrial Welfare Commission. The foundation of Defendants' violations includes a pattern of: systematically failing to compensate overtime wages for all hours worked by employees exceeding eight hours; systematically denying rest periods or failing to provide premium wages in lieu thereof; systematically denying meal periods or failing to provide premium wages in lieu thereof; systematically failing to furnish accurate wage statements; and systematically failing to pay all wages owed upon termination of employment, and securing releases from similarly situated aggrieved employees in violation of Labor Code section 206.5. These violations constitute a uniform practice applied to all non-exempt workers employed by Defendants.

Additional facts and allegations are detailed in Aggrieved Employee's complaint. Liability under PAGA may be established based on numerous Labor Code predicate provisions, including but not limited to sections 201, 202, 203, 210, 216, 218, 218.6, 223, 225, 226, 226.2, 226.7, 510, 512, 2810.5, 6400, 6401, 6401.7, 6402, 6403, 6404, 1174, 1175, 1194, 1194.2, 1197, 1197.1, 1199, 2673.1(a), and 2802, Industrial Welfare Commission Wage Orders, sections 2699 et seq. and all provisions enumerated in Labor Code section 2699.5 (including penalty provisions related to these predicate provisions), among others. Any violation of these or other Labor Code provisions serves as the foundation for a PAGA claim by an aggrieved employee on behalf of themselves and other current and former employees.

Specifically, the practices described above and the violations detailed below affect all non-exempt workers employed by Defendants in California:

- Defendants required the execution of a release of a claim or right by aggrieved employees on account of wages due, or to become due, or made as an advance on wages to be earned unless payment of those wages has been made in violation of Cal Labor § 206.5 and California case law.
- Defendants subjected employees to employer oversight, or knowingly allowed or permitted them to work shifts of eight or more hours daily and/or forty hours weekly without providing compensation for all wages earned, including minimum wages and overtime premium wages in violation of Cal. Labor Code §§ 201, 202, 221, 226.2, 1194 and 558, and the Wage Orders, by improperly maintaining records of actual hours worked and wages earned, and by failing to compensate for all hours worked.
- Defendants failed to schedule or authorize meal and rest periods for non-exempt employees which resulted in failure to provide or authorize proper thirty-minute meal periods and proper ten-minute rest periods to which non-exempt employees are entitled, and failure to compensate premium meal and rest period wages in lieu of missed, delayed, or shortened meal and rest periods, in violation of Cal. Labor Code §§ 226.7 and 512, Wage Orders and California case law.
- Defendants failed to pay all wages earned including unpaid minimum and overtime wages and failed to pay all additional wages in lieu of providing all meal and rest periods immediately or within 72 hours upon termination of employment.
- Defendants failed to furnish accurate wage statements reflecting actual hours worked and amounts earned, in violation of Cal. Labor Code §§ 226, 1174 and the Wage Orders as employees did not receive wage statements that included gross wages earned, total hours worked, all deductions, net wages earned, the inclusive dates of the period for which the employee is paid, the last four digits of the employee's social security number or an employee identification number of the legal entity that secured the services of the employer, all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee.

The above provisions do not encompass all derivative penalties associated with the above provisions, which are listed throughout the Labor Code and constitute PAGA penalties.

If no action is taken by the Agency within 65 days, we will assume that we may pursue this action under the theories described above against Odyssey Agricultural Development, LLC, Insights, Inc., Odyssey Agricultural Holdings, LLC, and Valley Agricultural Holdings, LLC and the Individual Defendants described above and their managers, agents, owners, and other liable persons and entities (pursuant to, without limitation, Labor Code sections 210, 558, 1197.1, 2699(f) and other provisions).

Aggrieved Employee Jose Beltran may be contacted through our office: Farzam Law Firm, 11766 Wilshire Blvd., Suite 280, Los Angeles, CA 90025.

PLEASE TAKE NOTICE THAT THIS IS ALSO A GENERAL LITIGATION PRESERVATION NOTICE to preserve all documents relating to all employees, including but not limited to all timekeeping and payroll records in paper form, native electronic form and any other format in which they are generated and maintained in the regular course of business; all databases and computer or electronic systems that are used for timekeeping and payroll; all records and evidence in any way related to the facts and claims asserted in this letter; all records and evidence in any way related to claims of Aggrieved Employee, the state, and other current or former employees under the California Labor Code Private Attorney General (including underlying Labor Code and IWC orders), the California Government Code, and the Equal Employment Opportunity Act. These documents include but are not limited to all schedules (both current and former employees), all timekeeping records, all rest and meal period records, all duty and responsibility records, all records which include employee signatures or initials, all payroll records, all state or federal withholding records, all personnel files and other employment records, all records concerning the payment or non-payment of wages, or provision or non-provision of state mandated labor code protections, as well as all documents pertaining to harassment or discrimination against employees, all communications relating to these records and documents, and all emails relating to these records and documents.

Very truly yours,

JOSEPH FARZAM LAW FIRM

/s/ Christopher Goodrich

Christopher Goodrich, Esq.