Electronically FILED by
Superior Court of California,
County of Los Angeles
12/08/2025 4:16 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By A. Villchis-David, Deputy Clerk

LAUREL EMPLOYMENT LAW
Joshua I. White (State Bar No. 278166)
Brendan J. Burton (State Bar No. 323495)
808 Wilshire Boulevard, Suite 200
Santa Monica, CA 90401
Telephone: (323) 551-9221
Facsimile: (310) 564-4093
josh@laurelemploymentlaw.com
brendan@laurelemploymentlaw.com

Attorneys for Scott, on behalf of
the State of California and Aggrieved Employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES - STANLEY MOSK COURTHOUSE

ASIANNA SCOTT, individually and on behalf of the State of California and Aggrieved Employees, Plaintiff, vs. CRENSHAW LEGACY, LLC, a California Limited Liability Company; and DOES 1 through 10, Inclusive, Defendants.	Case No.: 25STCV35800 **COMPLAINT FOR CIVIL PENALTIES PURSUANT TO THE CALIFORNIA LABOR CODE § 2699(a) & (f)** **PRIVATE ATTORNEYS GENERAL ACT OF 2004**

COMES NOW Plaintiff ASSIANA SCOTT ("Scott" or "Plaintiff") on behalf of herself, the State of California, and all other Aggrieved Employees, hereby brings this Representative Action Complaint against Defendant CRENSHAW LEGACY, LLC, and DOES 1 through 10 ("Crenshaw Legacy" or "Defendants"), inclusive, and alleges as follows:

SUMMARY

1. Scott and the Aggrieved Employees, on behalf of the State of California, bring this enforcement action pursuant to the California Labor Code Private Attorneys General Act of 2004 ("PAGA"), Lab. Code §§ 2698–2699.8, against Crenshaw Legacy to redress systemic wage-and-hour violations committed against non-exempt employees who worked for Crenshaw Legacy at any time beginning one year and 65 days prior to the filing of this Complaint and continuing until final resolution of this Action. During the relevant period, Crenshaw Legacy employed Scott and the Aggrieved Employees as hourly retail workers at its cannabis dispensary located at 4050 Crenshaw Boulevard, Los Angeles, California, where they were subjected to pervasive Labor Code and IWC Wage Order violations, including but not limited to unpaid wages, unpaid overtime, missed meal and rest periods, unpaid premiums, inaccurate wage statements, unlawful withholding of earned gratuities, untimely payment of wages, and the failure to maintain or produce legally required records.

2. Crenshaw Legacy pays Scott and the Aggrieved Employees on an hourly basis. Scott and the Aggrieved Employees regularly worked shifts exceeding 8 hours per day and 40 hours per week. They frequently worked multiple consecutive days without receiving the statutory overtime compensation required under Lab. Code §§ 510 and 1194. Crenshaw Legacy routinely failed to pay overtime, double-time, or straight-time wages for all hours worked. Instead, Crenshaw Legacy required Scott and the Aggrieved Employees to work through legally mandated breaks and to continue performing duties while clocked in under artificially manipulated time records, including falsified meal-period entries that were never taken. During multiple pay periods, Crenshaw Legacy failed to pay for numerous hours worked, and ultimately failed to pay Scott and the Aggrieved Employees all wages owed during active employment and upon separation, in violation of Lab. Code §§ 204 and 201–204.

3. Crenshaw Legacy also subjected Scott and the Aggrieved Employees to widespread and willful meal- and rest-break violations. Due to chronic understaffing, and because Scott was frequently the only employee on duty, Crenshaw Legacy failed to authorize, permit, or make available uninterrupted meal periods as required under Lab. Code § 512 and rest periods as required under Lab. Code § 226.7. Crenshaw Legacy did not provide the required premium compensation for missed breaks, further violating Lab. Code § 226.7. Supervisors and owners openly discouraged Scott and the Aggrieved Employees from taking breaks, citing cost-saving measures, and the employer manipulated Homebase timekeeping entries to reflect breaks that did not occur falsely.

4. Crenshaw Legacy additionally withheld or diverted earned gratuities belonging to Scott and the Aggrieved Employees, in violation of Lab. Code § 351. Management repeatedly claimed that tip envelopes were "lost," redistributed tip funds improperly, and maintained no lawful tracking system for gratuities. Crenshaw Legacy also made unlawful deductions and underpayments from earned wages in violation of Lab. Code §§ 221–223.

5. Crenshaw Legacy failed to maintain accurate payroll records and accurate itemized wage statements as required under Lab. Code §§ 226(a), 1174, and 1174.5. Scott and the Aggrieved Employees received wage statements that omitted overtime hours, regular hours, break premiums, and gross and net wages earned. After terminating employees or ceasing operations at the Crenshaw location, Crenshaw Legacy removed employees' access to payroll records and failed to furnish required wage-statement records upon request, in violation of Lab. Code § 226(b)–(c). These deficient records deprived Scott and the Aggrieved Employees of their ability to verify wage accuracy or confirm compensation owed.

6. Because Crenshaw Legacy failed to pay all earned wages—regular, overtime, double-time, and premium pay—Scott and the Aggrieved Employees were denied all wages owed during employment and, for former employees, all wages owed upon separation, in violation of Lab. Code §§ 201–204. Crenshaw Legacy's ongoing practices also resulted in the failure to timely pay semimonthly wages in violation of Lab. Code § 204.

7. Scott submits this representative PAGA action to address Crenshaw Legacy's unlawful policies and practices of: (1) failing to pay all straight-time, overtime, and double-time wages owed under Lab. Code §§ 510 and 1194; (2) failing to provide or make available compliant meal periods under Lab. Code § 512 and rest periods under Lab. Code § 226.7, and failing to provide premium compensation for missed breaks; (3) unlawfully diverting or withholding gratuities in violation of Lab. Code § 351; (4) making unlawful deductions and underpayments from earned wages in violation of Lab. Code §§ 221–223; (5) failing to maintain required payroll records in violation of Lab. Code §§ 1174 and 1174.5; (6) failing to provide accurate itemized wage statements under Lab. Code § 226(a); (7) failing to provide requested wage-statement records in violation of Lab. Code § 226(b)–(c); and (8) failing to timely pay all wages owed during employment and following separation in violation of Lab. Code §§ 201–204.

8. These unlawful practices violate the applicable Industrial Welfare Commission Wage Order—IWC Wage Order No. 7-2001 (Mercantile Industry)—which governs retail employees such as Scott and the Aggrieved Employees.

9. Scott brings this Action to recover all civil penalties available under PAGA on behalf of the State of California and the other Aggrieved Employees, and to obtain redress for Crenshaw Legacy's uniform and systemic violations of the Labor Code that deprived Scott and the Aggrieved Employees of their lawfully earned compensation.

THE PARTIES

10. Scott and the Aggrieved Employees worked for Crenshaw Legacy as non-exempt, hourly DSA/Retail Associates ("budtenders") at the cannabis dispensary located at 4050 Crenshaw Boulevard in Los Angeles, California, during the relevant statutory period. Crenshaw Legacy classified Scott and the Aggrieved Employees as non-exempt employees and paid them on an hourly basis throughout their employment. Scott was employed from approximately September 4, 2024, through March 4, 2025.

11. Scott brings this action on behalf of the State of California and on behalf of all of Crenshaw Legacy's current and former non-exempt employees in California who suffered one or more of the Labor Code and/or Wage Order violations alleged herein, as enumerated in Lab. Code

§§ 2698–2699.8, and who worked for Crenshaw Legacy any time beginning one year and 65 days prior to the filing of this Complaint until its final resolution. These employees are referred to herein as the "Aggrieved Employees."

12. Scott and the Aggrieved Employees are "aggrieved employees" within the meaning of Lab. Code § 2699(c) because Crenshaw Legacy employed them in California and they suffered one or more of the Labor Code and/or IWC Wage Order violations alleged in this Action during the relevant limitations period.

13. Scott and the Aggrieved Employees were employees of Crenshaw Legacy at all relevant times, as defined in the California Labor Code and the applicable IWC Wage Order, including IWC Wage Order No. 7-2001 (Mercantile Industry).

14. Crenshaw Legacy is a California limited liability company operating retail cannabis dispensaries, including the dispensary located at 4050 Crenshaw Boulevard, Los Angeles, California, where the violations alleged herein occurred. Crenshaw Legacy may be served through its registered agent, **Adie Meiri, at 4050 Crenshaw Boulevard, Los Angeles, California 90043**.

15. Crenshaw Legacy was the employer of Scott and the Aggrieved Employees, and was also a "person acting on behalf of an employer," including its owners, managers, supervisors, and agents, within the meaning of Lab. Code § 558.1 and Lab. Code § 1197.1. Crenshaw Legacy, through its owners, officers, managing agents, and supervisors, paid or caused to be paid to Scott and the Aggrieved Employees wages less than those required by California law, including unpaid minimum wages, overtime wages, double-time wages, break premiums, and final wages, and therefore is subject to civil penalties under the Labor Code.

Jurisdiction & Venue

16. This Court has jurisdiction over the State of California's claims for civil penalties brought by Scott and the Aggrieved Employees, as deputized representatives under the California Labor Code Private Attorneys General Act ("PAGA"), pursuant to the California Constitution, Article VI, § 10, which grants the Superior Court original jurisdiction over all causes except those given by statute to other tribunals. PAGA provides no alternative jurisdictional assignment; therefore, jurisdiction properly lies with this Court.

17. Scott and the Aggrieved Employees, through counsel, submitted a written PAGA Notice to the California Labor and Workforce Development Agency ("LWDA") in accordance with Lab. Code § 2699.3(a), on September 26, 2025. More than the statutory period has passed, and Scott and the Aggrieved Employees now bring this civil enforcement action on behalf of the State of California for violations of the Labor Code and applicable IWC Wage Orders.

18. This Court has personal jurisdiction over Crenshaw Legacy because it is a California limited liability company, formed under California law, registered to conduct business in California, and has purposefully availed itself of the privileges and protections of the State by operating a cannabis dispensary in Los Angeles County and employing Scott and the Aggrieved Employees within the State.

19. Venue is proper in this judicial district pursuant to Code of Civil Procedure §§ 393 and 395.5. Crenshaw Legacy employed Scott and the Aggrieved Employees within Los Angeles County, conducted substantial business operations within this County, and committed the Labor Code violations alleged herein at its business location at 4050 Crenshaw Boulevard, Los Angeles, California. Accordingly, the obligations, injuries, and liabilities giving rise to this PAGA Action occurred within this County, rendering venue proper in the Superior Court for the County of Los Angeles.

Factual Allegations

20. Crenshaw Legacy operates retail cannabis dispensaries in Los Angeles County and holds itself out as a licensed provider of cannabis products to the public. To meet its operational demands, Crenshaw Legacy employs hourly, non-exempt retail workers—including Scott and the Aggrieved Employees—to staff and run its dispensary located at 4050 Crenshaw Boulevard, Los Angeles, California.

21. Crenshaw Legacy classified Scott and the Aggrieved Employees as non-exempt employees and paid them by the hour. While job titles may vary, the primary job duties performed by Scott and the Aggrieved Employees included customer service, sales, inventory management, cash handling, and compliance-related activities customary to cannabis retail operations. Despite these duties, Crenshaw Legacy subjected Scott and the Aggrieved Employees to uniform and

unlawful wage-and-hour policies and practices that violated the Labor Code and IWC Wage Order No. 7-2001.

22. Scott and the Aggrieved Employees regularly worked shifts exceeding 8 hours per workday and 40 hours per workweek. Scott typically worked 6:00 a.m. to 1:00–2:00 p.m. opening shifts, or 2:00 p.m. to 10:00 p.m. closing shifts, five to six days per week. In many pay periods, Scott and the Aggrieved Employees worked consecutive days without receiving the premium compensation required for seventh-day work under Lab. Code §§ 510 and 1194. Crenshaw Legacy, however, failed to pay them for all hours worked, including overtime and double-time hours, in violation of Lab. Code §§ 510 and 1194.

23. Crenshaw Legacy also required Scott and the Aggrieved Employees to work during times they were entitled to be relieved of all duties. Due to severe understaffing, Scott was regularly the only employee present at the Crenshaw location for extended periods, making it impossible to leave the sales floor. Crenshaw Legacy knowingly and willfully denied Scott and the Aggrieved Employees compliant meal periods under Lab. Code § 512 and rest periods under Lab. Code § 226.7 by requiring them to remain on duty throughout their shifts. Crenshaw Legacy further manipulated timekeeping entries in the Homebase system to falsely reflect meal breaks that were never taken, concealing these violations and depriving Scott and the Aggrieved Employees of premium wages owed under Lab. Code § 226.7.

24. Crenshaw Legacy also withheld or diverted gratuities earned by Scott and the Aggrieved Employees in violation of Lab. Code § 351. Management repeatedly took possession of tip envelopes, claimed that tips were “lost,” redistributed tip amounts inconsistently, and maintained no lawful or transparent system for tracking gratuities. These practices resulted in the unlawful retention and diversion of earned tips.

25. Crenshaw Legacy further made unlawful deductions and underpayments from earned wages in violation of Lab. Code §§ 221–223. This included failing to pay the entire pay periods worked by Scott and withholding wages owed at separation in violation of Lab. Code §§ 201–204. Despite multiple inquiries regarding unpaid wages for the pay periods spanning February

16–28, 2025, and March 1–4, 2025, Crenshaw Legacy refused to pay Scott and the Aggrieved Employees the wages due.

26. Crenshaw Legacy failed to maintain and furnish accurate payroll and wage records as required under Lab. Code §§ 226(a), 226(b)–(c), 1174, and 1174.5. Crenshaw Legacy issued wage statements that omitted regular hours, overtime hours, gross wages earned, net wages earned, and premium wages owed. After terminating employees or ceasing operations at the Crenshaw location, Crenshaw Legacy removed employees' access to payroll documents and failed to provide wage-statement records upon request in violation of Lab. Code § 226(b)–(c). These failures prevented Scott and the Aggrieved Employees from verifying hours worked or ensuring proper payment.

27. Crenshaw Legacy subjected Scott and the Aggrieved Employees to unsafe working conditions, including rodent infestations, rotting ant traps, and active termite damage at the Crenshaw location. Though unsafe conditions primarily inform other statutory frameworks, the resulting circumstances contributed to the continuous on-duty work, denial of breaks, and excessive hours suffered by Scott and the Aggrieved Employees.

28. Scott and the Aggrieved Employees were uniformly subjected to Crenshaw Legacy's company-wide policies and practices. These violations were not isolated or accidental; they were systemic, repeated, and imposed across all relevant pay periods. Despite working substantial hours and satisfying all required duties, Scott and the Aggrieved Employees were not paid all wages owed, denied all legally required breaks, issued inaccurate wage statements, forced to work without relief, and not provided final wages at separation.

29. Crenshaw Legacy's violations of the California Labor Code were knowing, intentional, and carried out in bad faith. As a direct and foreseeable result of these violations, Scott and the Aggrieved Employees suffered substantial wage loss, denial of statutory protections, and deprivation of wages, tips, and benefits guaranteed under California law.

PAGA Notice Requirement

30. Scott exhausted the notice requirement by filing a notice with the LWDA, as required under the PAGA, as stated in their letter dated September 26, 2025. A true and correct copy of Scott's letter is attached hereto as **Exhibit A** and is incorporated herein by reference.

31. As of the filing of this complaint, the LWDA has not provided notice of its intent to investigate the alleged violations, nor has it assumed jurisdiction over the applicable penalty claims alleged. Therefore, Scott has exhausted the procedural requirement under PAGA to pursue all civil penalty claims as provided under PAGA.

32. Throughout the relevant time period, Crenshaw Legacy employed numerous other non-exempt employees in California, who, on information and belief, were subjected to the same unlawful policies and practices described herein. As a direct result of Crenshaw Legacy's unlawful policies and practices, Scott and Aggrieved Employees have suffered harm. They are entitled to recover civil penalties pursuant to Labor Code §§ 2698, *et seq.*

Count I

Penalties Pursuant to Labor Code § 2699(a)

33. Scott incorporates all other paragraphs by reference.

34. Labor Code § 2699(a) provides:

> Notwithstanding any other provision of law, any provision of this code that provides for a civil penalty to be assessed and collected by the Labor and Workforce Development Agency or any of its departments, divisions, commissions, boards, agencies or employees, for a violation of this code, may, as an alternative, be recovered through a civil action brought by an aggrieved employee on behalf of himself or herself and other current or former employees.

35. Labor Code § 203 provides, in relevant part:

> If an employer willfully fails to pay, without abatement or reduction, in accordance with Sections 201, 201.5, 202, and 205.5, any wages of an employee who is discharged or who quits, the wages of the employee shall continue as a penalty from the due date thereof at the same rate until paid or until an action therefore is commenced; but the wages shall not continue for more than 30 days.

36. Labor Code § 226(a) provides:

> Every employer shall, semimonthly or at the time of each payment of wages, furnish each of his or her employees, either as a detachable part of the check, draft, or voucher paying the employee's wages, or separately when wages are paid by personal check or cash, an accurate itemized statement in writing showing (1) gross wages earned, (2) total hours worked by the employee, except for any employee whose compensation is solely based on a salary and who is exempt from payment of overtime under subdivision (a) of Section 515 or any applicable order of the Industrial Welfare Commission, (3) the number of piece-rate units earned and any applicable piece rate if the employee is paid on a piece-rate basis, (4) all deductions, provided that all deductions made on written orders of the employee may be aggregated and shown as one item, (5) net wages earned, (6) the inclusive dates of the period for which the employee is paid, (7) the name of the employee and his or her social security number, (8) the name and address of the legal entity that is the employer, and (9) all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee.

37. Labor Code § 226(e)(1) provides:

> An employee suffering injury as a result of a knowing and intentional failure by an employer to comply with subdivision (a) is entitled to recover the greater of all actual damages or fifty dollars ($50) for the initial pay period in which a violation occurs and one hundred dollars ($100) per employee for each violation in a subsequent pay period, not to exceed an aggregate penalty of four thousand dollars ($4,000), and is entitled to an award of costs and reasonable attorney's fees.

38. Labor Code § 226.3 provides:

> Any employer who violates subdivision (a) of Section 226 shall be subject to a civil penalty in the amount of two hundred fifty dollars ($250) per employee per violation in an initial citation and one thousand dollars ($1,000) per employee for each violation in a subsequent citation, for which the employer fails to provide the employee a wage deduction statement or fails to keep the records required in subdivision (a) of Section 226. The civil penalties provided for in this section are in addition to any other penalty provided by law. In enforcing this section, the Labor Commissioner shall take into consideration whether the violation was inadvertent, and in his or her discretion, may decide not to penalize an employer for a first violation when that violation was due to a clerical error or inadvertent mistake.

39. Labor Code § 558(a) and (c) provide:

> (a) Any employer [] who violates, or causes to be violated, a section of this chapter or any provisions regulating hours and days of work in any order of the Industrial Welfare Commission shall be subject to a civil penalty as follows: (1) For any initial violation, fifty dollars ($50) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages. (2) For each subsequent violation, one hundred dollars ($100) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages…. (c) The civil penalties provided for in this section are in addition to any other civil or criminal penalty provided by law.

40. Labor Code § 1174(d) requires every person employing labor in California to, among other things:

> Keep at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments.

41. Labor Code § 1174.5 subjects any person who willfully fails to maintain records required by Labor Code § 1174 to a civil penalty of $500.

42. Scott and the Aggrieved Employees seek civil penalties pursuant to Lab. Code § 2699(a) for each failure by Crenshaw Legacy, as alleged in this Complaint, to timely pay all wages owed to Scott and the Aggrieved Employees in compliance with Lab. Code §§ 201–203, including civil penalties established by Lab. Code § 203. Scott and the Aggrieved Employees seek such penalties as an alternative to any penalties available to individual litigants under Lab. Code § 203, where applicable.

43. Scott and the Aggrieved Employees also seek civil penalties pursuant to Lab. Code § 2699(a) for each failure by Crenshaw Legacy to provide accurate, compliant itemized wage statements in violation of Lab. Code § 226(a), including civil penalties in the amounts set forth in Lab. Code § 226(e).

44. Scott and the Aggrieved Employees further seek civil penalties pursuant to Lab. Code § 2699(a) for each pay period in which Crenshaw Legacy failed to maintain accurate payroll records or failed to produce such records upon request, in violation of Lab. Code §§ 1174 and 1174.5.

45. Scott and the Aggrieved Employees also seek civil penalties in the amounts described under Lab. Code § 558, through Lab. Code § 2699(a), for each pay period in which Crenshaw Legacy failed to pay all overtime wages and double-time wages owed to Scott and the Aggrieved Employees, in violation of Lab. Code §§ 510 and 1194.

46. Scott and the Aggrieved Employees also seek civil penalties pursuant to Lab. Code § 2699(a) for Crenshaw Legacy's failure to authorize and permit compliant meal periods under Lab. Code § 512 and rest periods under Lab. Code § 226.7, including applicable penalties under Lab. Code § 558 for each pay period in which these violations occurred.

47. Scott and the Aggrieved Employees further seek civil penalties pursuant to Lab. Code § 2699(a) for Crenshaw Legacy's unlawful diversion or withholding of gratuities in violation of Lab. Code § 351, and for any unlawful withholding or underpayment of wages in violation of Lab. Code §§ 221–223.

48. Pursuant to Lab. Code § 2699.3(a)(1)–(2), Scott and the Aggrieved Employees provided written notice to the California Labor and Workforce Development Agency ("LWDA") of their intention to pursue these claims. More than sixty-five (65) calendar days have passed without notice from the LWDA of an intent to investigate. Scott and the Aggrieved Employees have therefore satisfied all administrative prerequisites required to commence this civil action under Lab. Code § 2699.3(a).

49. Scott and the Aggrieved Employees seek the foregoing civil penalties on behalf of the State of California and the other Aggrieved Employees as set forth in Lab. Code § 2699(g) and (i). Crenshaw Legacy is liable to the State of California and to Scott and the Aggrieved Employees for all recoverable PAGA civil penalties alleged herein, together with interest thereon.

50. Scott and the Aggrieved Employees are also entitled to an award of reasonable attorneys' fees and costs pursuant to Lab. Code § 2699(g).

51. Wherefore, Scott and the Aggrieved Employees request relief as hereinafter provided.

Count II

Penalties Pursuant to Labor Code § 2699(f)

52. Scott incorporates all other paragraphs by reference.

53. Labor Code § 2699(f) provides:

> For all provisions of this code except those for which a civil penalty is specifically provided, there is established a civil penalty for a violation of these provisions, as follows: … (2) If, at the time of the alleged violation, the person employs one or more employees, the civil penalty is one hundred dollars ($100) for each aggrieved employee per pay period for the initial violation and two hundred dollars ($200) for each aggrieved employee per pay period for each subsequent violation.

54. Labor Code § 200 defines wages as "all amounts for labor performed by employees of every description, whether the amount is fixed or ascertained by the standard of time, task, piece, commission basis, or other method of calculation." All such wages are subject to California's overtime and double time requirements, including those set forth above.

55. Labor Code § 204(a) provides that "[a]ll wages . . . earned by any person in any employment are due and payable twice during each calendar month[.]"

56. Labor Code § 510(a) provides as follows:

> Eight hours of labor constitutes a day's work. Any work in excess of eight hours in one workday and any work in excess of 40 hours in any one workweek and the first eight hours worked on the seventh day of work in any one workweek shall be compensated at the rate of no less than one and one-half times the regular rate of pay for an employee. Any work in excess of 12 hours in one day shall be compensated at the rate of no less than twice the regular rate of pay for an employee.

57. IWC Wage Order 7-2001(3)(A)(1) states that employees:

> …shall not be employed more than eight (8) hours in any workday or more than 40 hours in any workweek unless the employee receives one and one-half (1 ½) times such employee's regular rate of pay for all hours worked over 40 hours in the workweek. Employment beyond eight (8) hours in any workday

> or more than six (6) days in any workweek is permissible provided the employee is compensated for such overtime at not less than … [o]ne and one-half (1½) times the employee's regular rate of pay for all hours worked in excess of eight (8) hours up to and including 12 hours in any workday, and for the first eight (8) hours worked on the seventh (7th) consecutive day of work in a workweek….

58. Labor Code § 1194(a) provides as follows:

> Notwithstanding any agreement to work for a lesser wage, any employee receiving less than the legal minimum wage or the legal overtime compensation applicable to the employee is entitled to recover in a civil action the unpaid balance of the full amount of this minimum wage or overtime compensation, including interest thereon, reasonable attorneys' fees, and costs of suit.

59. Labor Code § 1198 makes it unlawful for employers to employ employees under conditions that violate relevant Wage Order(s).

60. To the extent that any violation alleged in this Complaint does not carry civil penalties recoverable under Lab. Code § 2699(a), Scott and the Aggrieved Employees seek civil penalties pursuant to Lab. Code § 2699(f) for each pay period in which Scott and the Aggrieved Employees were aggrieved, in the amounts established by Lab. Code § 2699(f).

61. Scott and the Aggrieved Employees seek civil penalties under Lab. Code § 2699(f) for Crenshaw Legacy's violations of Labor Code provisions that do not contain their own civil penalty scheme, including but not limited to:

62. (1) Violations of Lab. Code § 351 for the unlawful diversion and withholding of gratuities; violations of Lab. Code §§ 221–223 for unlawful withholding, underpayment, or secret rebate of wages; (2) violations of Lab. Code § 204 for the failure to timely pay all wages during employment; (3) violations of Lab. Code §§ 201–202 for the failure to timely pay final wages at separation to Scott and the Aggrieved Employees; (4) violations of Lab. Code § 226(b)–(c) for failing to provide requested wage-statement records within the statutory period; and (5) any additional Labor Code violations alleged herein that do not contain an express civil-penalty provision.

63. Pursuant to Lab. Code § 2699.3(a)(1)–(2), Scott and the Aggrieved Employees provided written PAGA Notice to the Labor and Workforce Development Agency ("LWDA") of their intent to pursue these claims. More than sixty-five (65) calendar days have passed without notice from the LWDA of intent to investigate. Accordingly, all administrative prerequisites under Lab. Code § 2699.3(a) has been satisfied.

64. Scott and the Aggrieved Employees seek the foregoing civil penalties on behalf of the State of California and the other Aggrieved Employees as set forth in Lab. Code § 2699(g) and (i).

65. Under Lab. Code § 2699(f)(2), Crenshaw Legacy is liable for civil penalties of one hundred dollars ($100) per pay period for each aggrieved employee for an initial violation of any Labor Code provision that does not contain its own civil penalty, and two hundred dollars ($200) per pay period for each subsequent violation.

66. Crenshaw Legacy is therefore liable to the State of California and to Scott and the Aggrieved Employees for the civil penalties described in this Complaint. Scott and the Aggrieved Employees are also entitled to recover reasonable attorneys' fees and costs under Lab. Code § 2699(g).

67. Wherefore, Scott and the Aggrieved Employees request relief as hereinafter provided.

<u>RELIEF REQUESTED</u>

WHEREFORE, Scott, on behalf of the State of California and the Aggrieved Employees, requests the following relief:

a. A declaratory judgment that Defendants' conduct violated the Labor Code as alleged herein;

b. An order awarding civil penalties against Defendants to the fullest extent provided for by PAGA;

c. An award of attorneys' fees, costs, and expenses as provided by the California Labor Code, including Labor Code § 2699(g)(1); California Code of Civil Procedure §1021.5; and/or any other applicable law;

d. Pre- and post-judgment interest on any amounts awarded at the highest applicable rate allowed by law; and

e. Such other and further relief as this Court deems just and proper.

Dated: December 8, 2025

LAUREL EMPLOYMENT LAW APC

Joshua I. White, Esq.
Brendan J. Burton, Esq.

Attorneys for Scott, on Behalf of the State of California and Aggrieved Employees

EXHIBIT A

Michiko Vartanian, Esq.
michiko@laurelemploymentlaw.com

LAUREL
EMPLOYMENT LAW

September 26, 2025

NOTICE VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Private Attorney General Act (PAGA) – Filing

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Crenshaw Legacy, LLC dba Free the Trappers
4050 Crenshaw Boulevard
Los Angeles, California 90008

Re: Notice by Assiana Scott on Behalf of Herself and all other Aggrieved California Employees of Crenshaw Legacy, LLC, as an individual and a Representative of the State of California

Dear Labor and Workforce Development Agency and Crenshaw Legacy, LLC:

Pursuant to the Labor Code Private Attorneys General Act of 2004 ("PAGA"), Labor Code sections 2698, *et seq*., Assiana Scott ("Ms. Scott" or "Claimant") intends to bring a civil action against Crenshaw Legacy, LLC ("Crenshaw Legacy" or "the Employer"), individually and on behalf of all other Aggrieved Employees. This letter serves as Claimant's written notice pursuant to Labor Code section 2699.3(a)(1), providing the Labor and Workforce Development Agency ("LWDA") the opportunity to investigate the alleged claims contained herein of the specific provisions of the Labor Code allegedly violated by the Employer and the facts and theories in support of said allegations. The information contained herein is based on the currently available information and belief.

If the LWDA does not intend to investigate the alleged violations, Claimant intends to file a representative civil action for PAGA penalties on behalf of himself and all other Aggrieved Employees of the Employer and shall seek civil penalties under the PAGA. A copy of this Notice is being sent to the Employer by certified mail at the address above.

Identity of "Employees"

Claimant intends to pursue PAGA civil penalties on their own behalf and on behalf of other current and former employees of the entities/individual referenced below who performed non-exempt work for said entities/individual and were either: 1) classified as a non-exempt employee or 2) should have been classified as a non-exempt employee. Said employees are limited to employees performing work for said entities/individuals at any time during one (1) year prior to the date of this PAGA Notice letter and continuing until the unlawful employment practices are stopped and/or a judgment is entered. The said employees are collectively referred to hereinafter as "Aggrieved Employees." The names of Aggrieved Employees (other than Claimant) are contained within the personnel records of the Employer.

Identity and Capacity of Employers/Joint Employers

Claimant intends to pursue a PAGA action against the Employer and its parent companies, subsidiaries, successors, owners, officers, directors, and managing agents (collectively referred to as "Employer" as well). Claimant will seek to hold all owners, directors, officers, and managing agents of the Employer, personally liable for said violations to the extent permitted under Labor Code section 558 and/or Labor Code section 558.1.

All business entities referenced herein were the alter-egos of each and every other entity and individual referenced herein. There exists, and at all times herein mentioned has existed, a unity of interest and ownership between said entities and individuals such that any separateness between them ceased to exist in that said individuals and other entities have completely controlled, dominated, managed, and operated the business entities and have intermingled the assets of each to suit convenience. Further, each of the business entities is, and at all times mentioned herein were, mere shells, instrumentalities, and conduits through which the other above-referenced entities/individuals carried out their business while exercising complete control and dominance of the business such that individuality or separateness did not truly exist. Therefore, in the PAGA action, Claimant will seek to hold each said individual and/or entity jointly and severally liable for any and/or all violations committed by the other above-referenced individuals and/or entities.

It should further be noted that the Employer and its parent companies, subsidiaries, successors, owners, officers, directors, and/or managing agents have been engaged in a joint enterprise. Moreover, said persons/individuals are joint employers of Aggrieved Employees for the following reasons: 1) Said entities/individuals directly and/or indirectly exercised control over the wages, hours or working conditions of Aggrieved Employees; 2) Said entities/individuals had knowledge (either personally or through officers, directors and/or managing agents) of the work Aggrieved Employees were doing for them while supposedly being employed by another entity/individual and failed to prevent the work from occurring; and 3) Said entities retained or assumed a general right of control over hiring, direction, supervision, discipline, discharge, and relevant day-to-day aspects of the workplace behavior of Aggrieved Employees.

Violations/Supporting Facts and Theories

At all times herein, the Employer is a cannabis dispensary company doing business in Los Angeles County, California. The Employer provides retail sales of cannabis and related products as a licensed dispensary. The Employer operates within the State of California and has employed/jointly employed Employees (including Claimant) to perform work and services in furtherance of its business and joint enterprise interests.

Claimant worked for the Employer from September 4, 2024, to March 4, 2025, as a DSA/Retail Associate/Budtender. During Claimant's employment, Claimant was frequently unable to take legally required meal and rest breaks, receive timely payment of all wages and overtime, and work in safe and non-harassing conditions.

At all relevant times at least one year prior to the date of this Notice, the Employer subjected Claimant and other Aggrieved Employees to policies and practices that caused the violations of the Labor Code as described herein. Claimant now seeks civil penalties on behalf of all Aggrieved Employees and the State of California based on the alleged violations of the Labor Code and applicable IWC Wage Order, including civil penalties pursuant to Labor Code section 558(a). Claimant's claims are set forth in further detail below.

For reasons set forth herein, Claimant alleges the following violations of the Labor Code and applicable IWC Wage Order on behalf of himself and all other non-exempt Aggrieved Employees of Employer:

1. Unlawful Diversion or Withholding of Gratuities (Lab. Code § 351)
2. Unlawful Withholding or Deductions (Lab. Code §§ 221–223)
3. Minimum Wage Violations (Lab. Code § 1194)
4. Failure to Pay Overtime Wages (Lab. Code §§ 510, 1194)
5. Failure to Provide Meal Periods (Lab. Code § 512)
6. Failure to Provide Rest Periods (Lab. Code § 226.7)
7. Failure to Pay All Wages Owed (Lab. Code § 204)
8. Failure to Timely Pay All Wages Upon Separation of Employment (Lab. Code §§ 201–203)
9. Failure to Maintain Payroll Records (Lab. Code §§ 1174, 1174.5)
10. Failure to Provide Accurate Itemized Wage Statements (Lab. Code § 226(a))

The violations of the Employer, thus, include the following:

Unlawful Diversion or Withholding of Gratuities (Lab. Code § 351)

Labor Code section 351 prohibits any employer or agent from collecting, taking, or receiving any gratuity or a part thereof that is paid, given to, or left for an employee by a patron, or deducting any amount from wages due because of such gratuity. Gratuities are the sole property of the employee or employees to whom they are paid, given, or left for. Labor Code section 353 further requires employers to keep records of gratuities received by employees. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

Claimant and Aggrieved Employees regularly received gratuities left by patrons for their work. Yet, the Employer knowingly withheld or failed to properly distribute these gratuities and failed to keep proper records of gratuities as required. The Employer's management stated that tip envelopes were lost and gratuities were distributed in an inconsistent manner, lacking a valid tracking system. This conduct deprived Claimant and Aggrieved Employees of the full gratuities owed to them.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek restitution of gratuities, unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code section 351.

Unlawful Withholding or Deductions (Lab. Code §§ 221–223)

Labor Code sections 221 through 223 prohibit employers from collecting, taking, or receiving any part of wages previously paid to any employee; from entering into or making any secret or unlawful deduction from the wages of an employee; and from paying employees at wage rates less than those designated by contract or by law, or by secretly paying a lower wage while purporting to pay the wage designated by contract or law. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

The Employer made unlawful deductions from the wages of Claimant and Aggrieved Employees by improperly withholding compensation, including tip amounts, and failing to pay all amounts earned for hours worked. The Employer did not provide a clear or lawful explanation for these deductions and failed to remedy the shortfall after being informed by Claimant. This resulted in reduced wages below the amounts promised and actually worked.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek restitution of deductions, unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code sections 221 through 223.

Minimum Wage Violations (Lab. Code § 1194)

Labor Code section 1197 and the applicable IWC Wage Order require the Employer to pay no less than the applicable minimum wage for every hour worked. Labor Code section 1194 authorizes recovery of unpaid minimum wages and reasonable attorneys' fees when this duty is breached. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

The Employer required Claimant and Aggrieved Employees to work for pay that fell below the applicable minimum wage for certain hours worked. The Employer regularly failed to ensure all regular and overtime hours were paid at or above the minimum wage by manipulating work records and failing to correct known shortfalls. As a result, Claimant and Aggrieved Employees received less than the minimum wage required for all hours worked.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Pay Overtime Wages (Lab. Code §§ 510, 1194)

Labor Code section 510 and the applicable IWC Wage Order require the Employer to pay overtime compensation at not less than one and one-half times the regular rate of pay for all hours worked in excess of eight hours in one day and forty hours in one week, and double time for all hours worked in excess of twelve hours in one day or eight hours on the seventh consecutive day of work in a workweek. Labor Code section 1194 authorizes recovery of unpaid overtime compensation and reasonable attorneys' fees when this duty is breached. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

Claimant and Aggrieved Employees routinely worked overtime hours in excess of eight per day or forty per week without being paid at the required overtime rate. The Employer knowingly failed to pay these overtime premiums by recording only a fraction of overtime or omitting overtime pay altogether, and ignored requests to correct this pay. This resulted in regular underpayment for overtime hours worked.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid overtime wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Provide Meal Periods (Lab. Code § 512)

Labor Code section 512 and the applicable IWC Wage Order require the Employer to provide an uninterrupted meal period of at least thirty (30) minutes for each work period of more than five (5) hours, and a second meal period for work periods of more than ten (10) hours. Employees must be relieved of all duty during this time, and employers are prohibited from impeding, discouraging, or retaliating against employees for taking their meal periods. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

Claimant and Aggrieved Employees were systematically denied uninterrupted meal breaks during shifts longer than five hours because the Employer scheduled too few workers and required employees to remain on duty throughout their shifts. The Employer intentionally manipulated timesheets to show false break periods and explicitly discouraged requests for breaks, telling employees that breaks were not allowed or not feasible due to lack of coverage. Claimant and others often worked entire shifts without any meaningful opportunity for a meal break.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek premium pay, unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code section 512 and the applicable IWC Wage Orders.

Failure to Provide Rest Periods (Lab. Code § 226.7)

Labor Code section 226.7 and the applicable IWC Wage Order require the Employer to authorize and permit all employees to take an uninterrupted rest period of at least ten (10) minutes for each four (4) hours worked or major fraction thereof. Employers are prohibited from requiring employees to work during any required rest period and from impeding, discouraging, or retaliating against employees for taking rest periods. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

The Employer failed to authorize or permit Claimant and Aggrieved Employees to take ten-minute rest periods for every four hours worked or major fraction thereof. Staffing was so limited that Claimant and others could not leave their posts, and requests for rest breaks were disregarded or denied by management. The Employer’s scheduling and break practices made it impossible for employees to take required rest breaks during the workday.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek premium pay, unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code section 226.7 and the applicable IWC Wage Orders.

Failure to Pay All Wages Owed (Lab. Code § 204)

Labor Code section 204 requires employers to pay all earned wages at least twice during each calendar month, on days designated in advance as regular paydays. Wages must be paid no later than seven calendar days after the close of the payroll period in which the wages were earned, except for certain exceptions. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

The Employer failed to pay all wages earned by Claimant and Aggrieved Employees on regular paydays. The Employer delayed payment of wages for completed work periods and failed to pay certain earned wages at all, despite repeated requests by Claimant. This led to periods in which employees did not receive their full pay for hours worked.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code section 204.

Failure to Timely Pay All Wages Upon Separation of Employment (Lab. Code §§ 201–203)

Labor Code sections 201 through 203 require employers to pay all earned and unpaid wages immediately upon discharge or within seventy-two (72) hours after an employee quits without advance notice. If an employer willfully fails to pay such wages, the employee is entitled to waiting time penalties. Labor Code section 204 requires prompt payment of all wages due, including at the time of separation. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

When Claimant's employment ended, the Employer willfully failed to pay all final wages due. The Employer ignored Claimant's requests for her last paycheck and provided no legitimate reason for withholding the remaining compensation. This resulted in Claimant and similarly situated Aggrieved Employees leaving employment without timely payment of all wages earned.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek waiting-time penalties, unpaid wages, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code sections 201 through 204.

Failure to Maintain Payroll Records (Lab. Code §§ 1174, 1174.5)

Labor Code section 1174 requires every employer to keep, at a central location in the State or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by, and the wages paid to, employees for at least three years. Labor Code section 1174.5 provides that any employer who willfully fails to maintain such records is subject to a civil penalty. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

The Employer did not keep complete or accurate payroll records showing the actual hours worked and wages paid to Claimant and Aggrieved Employees. The Employer manipulated records to reflect inaccurate break periods and removed employees' access to wage records after separation. These actions prevented employees from verifying their work history and compensation.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code sections 1174 and 1174.5.

Failure to Provide Accurate Itemized Wage Statements (Lab. Code § 226(a))

Labor Code section 226(a) requires every employer to provide each employee with an accurate, itemized wage statement in writing, showing nine separate categories of information, including gross wages earned, total hours worked, all deductions, net wages earned, and the inclusive dates of the period for which the employee is paid. An employer who knowingly and intentionally fails to provide such a statement is subject to penalties. This Cause of Action proceeds under PAGA for civil penalties only pursuant to Labor Code section 2699(a) and is subject to the prefiling steps set out in Labor Code section 2699.3.

Claimant and Aggrieved Employees did not receive wage statements accurately reflecting all hours worked, all wages earned, or the true number of breaks taken. The Employer knowingly issued pay stubs that omitted or misstated important information, such as regular and overtime hours, break premiums, and correct pay rates. This left employees unable to confirm whether they had been fully and properly paid.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek damages available under Labor Code section 226(e), unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of Labor Code section 226(a).

Civil Penalties for Violation of the Labor Code and IWC Wage Orders

Labor Code section 558 subjects any employer or other person acting on behalf of an employer who violates, or causes to be violated, a section of Part 2, Chapter 1, of the Labor Code or any provision regulating hours and days of work in any IWC Wage Order to a civil penalty in the amount of $50.00 for any initial violation for each pay period in which an employee is underpaid in addition to an amount sufficient to recover underpaid wages, and $100.00 for each subsequent violation in addition to an amount sufficient to recover underpaid wages, which shall be paid to each affected employee.

Labor Code section 558.1(a) states: "Any employer or other person acting on behalf of an employer, who violates, or causes to be violated, any provision regulating minimum wages or hours and days of work in any order of the Industrial Welfare Commission ("IWC"), or violates, or causes to be violated, sections 203, 226, 226.7, 1193.6, 1194, or 2802, may be held liable as the employer for such violation." Labor Code section 558.1(b) expressly defines "other person acting on behalf of an employer" to include a "natural person who is an owner, director, officer, or managing agent of the employer."

Labor Code section 1197.1 states that any employer or other person acting either individually or as an officer, agent or employee of another person, which pays or causes to be paid to any employee a wage less than the minimum fixed by an order of the commission shall be subject to a civil penalty and restitution of wages payable to the employee in an amount of $100.00 for the initial violation for each pay period in which an employee underpaid in addition to an amount sufficient to recover underpaid wages, and $250.00 for each subsequent violation in addition to an amount sufficient to recover underpaid wages, which shall be paid to each affected employee.

As set forth above, Employers violated the IWC Wage Order regulating the hours and days of work, as well as Labor Code sections 510, 1197, and 1198, and caused employees to be paid less than the minimum set by the IWC Wage Order. As a result, Employers are liable for civil penalties under Labor Code sections 558, 558.1, and 1197.1.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Attorneys' Fees, Costs, Interest, and Penalties

Labor Code sections 218.6, 226(e), 1194, 1194.2, and 2699, *et seq*., give employees the right to recover in a civil action the unpaid balance of the full amount of minimum wages, regular wages, overtime compensation, damages, liquidated damages, and penalties, including interest thereon, reasonable attorney's fees, and costs of suit.

Pursuant to Labor Code section 2699(m), Aggrieved Employees are entitled to collect 35% of the civil penalty assessment. Accordingly, Employers are liable for these items in addition to the unpaid wages. Claimant has already incurred actual damages, costs, and attorney's fees and will continue to incur costs because of the Employer's unlawful actions.

Conclusion

If the State of California intends to investigate the matters set forth herein, please notify our offices as soon as possible, as prompt administrative action will enable the unlawful identified practices to be rectified in a timely manner. If the State of California does not send notification of its intent to investigate the alleged violations set forth herein, then pursuant to Labor Code sections

2698, *et seq*. (PAGA), Claimant reserves the right to file a PAGA cause of action seeking all available damages, penalties, and remedies as well as attorneys' fees, interest, and costs against Employer, as permitted under the PAGA. Should the State of California require any additional information, please do not hesitate to contact the undersigned.

Sincerely,
Laurel Employment Law APC

Michiko Vartanian, Esq.
michiko@laurelemploymentlaw.com