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September 10, 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]

Wal-Mart Associates, Inc.
c/o: C T Corporation System
330 N Brand Blvd. Suite 700
Glendale, CA 91203

Re: Christa Brown v. Wal-Mart Associates, Inc. et al.

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

Dear PAGA Administrator:

This office represents Christa Brown, a former employee of Wal-Mart Associates, Inc., dba Walmart Supercenter, Wal-Mart Neighborhood Market, Wal-Mart, Wal-Mart Vacations, and Sam's Club with respect to her retaliation and wrongful termination claims against Wal-Mart Associates, Inc. ("Walmart"), 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 Ms. Brown'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.

Ms. Brown, along with other similarly situated current and former employees of Walmart, 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.

Ms. Brown was hired as an Automotive Technician and worked out of the Walmart location at 7250 Carson Boulevard, Long Beach California 90808. She alleges she 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. As the only female mechanic in her department, her male co-workers routinely made inappropriate and offensive comments. On one occasion, one co-

worker escalated the harassment to physical assault. The unsafe working environment included one co-worker grabbing her breasts, pulling Ms. Brown against his body, and exposing his genitals to her.

Following the incident, Ms. Brown reported this unlawful conduct multiple times to her direct manager, to Human Resources, and to the hotline for Walmart employees. However, no corrective action was taken. Instead, Ms. Brown was met with retaliation. After raising multiple complaints, Ms. Brown began to receive pretextual write-ups for issues as trivial as parking in the back of the store, which was discipline that had never been imposed on her male counterparts.

Around March 2023, after enduring ongoing harassment and retaliation, Ms. Brown collapsed in the parking lot while leaving work. She was transported by ambulance and hospitalized for nearly a week. Ms. Brown was diagnosed with a vitamin deficiency exacerbated by the stress of her hostile work environment and inability to maintain normal eating and hydration during her shifts.

Even while hospitalized, Ms. Brown remained in communication with Walmart about her condition. Despite her transparency, upon her return to work she was falsely accused of threatening a co-worker with physical harm. Walmart barred Ms. Brown from entering the premises, and placed her on half-pay suspension, which lasted six months. Ultimately, Walmart terminated Ms. Brown's employment, citing these false allegations without ever producing evidence to support them. This conduct by Ms. Brown's employers plainly violated California Labor Code §§ 232.5, 1102.5 and 6210.

In addition to Ms. Brown's individual wrongful termination/retaliation claims, Ms. Brown intends to pursue civil penalties under PAGA in a representative action on behalf of herself 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 she and the other similarly situated current and former, similarly situated, non-exempt employees of her 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,



YESENIA L. RODRIGUEZ, 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:

Wal-Mart Associates, Inc.
c/o: C T Corporation System
330 N Brand Blvd. Suite 700
Glendale, CA 91203

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 September 10, 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: Mariana Zacarias

Signature: Mariana Zacarias