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September 3, 2025

VIA ONLINE SUBMISSION

LABOR AND WORKFORCE DEVELOPMENT AGENCY
<https://dir.govfa.net/411>

VIA CERTIFIED MAIL # 9589 0710 5270 2375 1947 56

Return Receipt Requested

NHNH, LLC
ATTN: Nina Hoque
4054 Locust Ave.
Long Beach, CA 90807

VIA CERTIFIED MAIL # 9589 0710 5270 2375 1947 63

Return Receipt Requested

NHNH, LLC
2000 Long Beach Blvd., Suite A
Long Beach, CA 90806

Re: *Luis Lazo v. NHNH, LLC*

**NOTICE OF LABOR CODE VIOLATIONS PURSUANT TO
LABOR CODE SECTION SECTIONS 2698 *et seq.***

To: California Labor and Workforce Development Agency and NHNH, LLC

From: Luis Lazo, on behalf of himself and aggrieved employees who were subject to NHNH, LLC's unlawful wage and hour policies as set forth below.

Factual Statement

Please note that this firm, Mahoney Law Group, APC, represents the interests of Luis Lazo ("Employee") as a representative for all other aggrieved employees, who intends to file a complaint alleging various Labor Code violations and seeking civil penalties under the Private Attorneys General Act of 2004, Labor Code section 2698, *et seq.* ("PAGA").

Theories of Labor Code Violations and Remedies

NHNNH, LLC (“Employer”) is a restaurant with locations in California, including Long Beach, California. Employee worked for Employer as a non-exempt employee within the past year. Employee alleges that Employer violated various sections of the Labor Code, including sections 201, 202, 203, 204, 226, 226.7, 510, 512, 1174, 1182.12, 1194, 1197, and 2802 by failing to provide Employee and all other aggrieved employees (1) all wages for all wages worked, including minimum wage and overtime pay, 2) their legally mandated meal and rest periods; (3) their legally mandated premium pay in lieu of compliant meal and rest periods; (4) accurate and complete wage statements required by law; (5) legally required waiting penalties to former employees upon the termination or other end of employment; and (6) reimbursement for business-related expenses. Employee and similarly aggrieved employees consist of identifiable, current, and/or former similarly situated persons who worked for Employer as non-exempt employees during the PAGA Period defined as one year prior to the submission of this letter to the Labor Workforce and Development Agency (“LWDA”) and certified mailing to Employer until resolution of these claims.

Employer failed to pay Employee and other aggrieved employees for all hours worked at the legally mandated wage rates for all hours worked. Employer failed to pay Employee and other aggrieved employees all legally mandated wages, including minimum and overtime wages, for all work performed, in violation of California law. Specifically, Employee and other aggrieved employees were obligated by the Employer to perform work while clocked-out for their meal periods. As such, Employee and other aggrieved employees were not adequately compensated the proper amount of wages during their employment. Employer’s conduct is in violation of Labor Code Sections 510, and 1194, and is actionable under PAGA.

Secondly, Employer failed to provide Employee and other aggrieved employees with timely uninterrupted meal and rest periods. In order to curtail labor costs, Employer understaffed work shifts resulting in Employee and other aggrieved employees being unable to take work-free meal and rest periods. Employer consistently required Employee and other aggrieved employees to work beyond five hours such that they were legally entitled to two rest periods and a single meal period. Employer’s failure to adequately staff employees caused Employee and other aggrieved employees to not have an opportunity to take their meal period until after the fifth hour and obligated employees to work through rest breaks. Employee and other aggrieved employees were not permitted to leave the premises for their meal and rest periods, when provided. Due to Employer’s policy and practices which prioritized work tasks over meal and rest period compliance, Employee and similarly aggrieved employees did not receive timely meal and rest periods, due the lack of adequate relief coverage. Employer failed to pay Employee and other aggrieved employees a meal and or rest break premium when theses Labor Code violations occurred. Employer’s conduct, which is in violation of Labor Code sections 226.7, 512, as well as 8 CCR section 11050, subdivisions 11 and 12, is also actionable under PAGA.

As a result of Employer's failure to pay all wages owed as described herein, Employer further failed to keep accurate payroll records and failed to provide Employee and other aggrieved employees with complete and accurate wage statements showing the true number of hours worked and accurate wages earned per pay period. This conduct is in violation of Labor Code sections 226 and 1174 and is actionable under PAGA.

As a further result of Employer's failure to pay all wages owed as described herein, Employer also violated Labor Code sections 201, 202, and 203, due to its uniform policy, practice and procedure of failing to pay all wages earned to former employees.

Employer also failed to reimburse Employee and other aggrieved employees for necessary business expenses incurred in the course of performing their job duties. Employee and other aggrieved were required to maintain Employer's uniform. Employer's failure to reimburse Employee and other aggrieved employees for work-related expenses is a direct violation of Labor Code Section 2802.

Employee will bring his lawsuit on behalf of himself and all other aggrieved employees who were employed by Employer. Please advise if the LWDA has any objection to my client including PAGA claims in her complaint. We look forward to your response, and please feel free to contact our office if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Young".

John Young, Esq.

MAHONEY LAW GROUP, APC