



AMENDED PAGA NOTICE

October 30, 2025

Submitted Pursuant to California Labor Code § 2699.3(a)(1)(A)

Claimant: Geoffrey K. Stauffer

Respondent: Duggan Bertsch, LLC, an Illinois limited liability company

LDWA Tracking No.: LWDA-CM-1134980-25

Purpose of Amendment

This Amended Notice supplements the PAGA notice submitted to the Labor and Workforce Development Agency (“LWDA”) on October 29, 2025.

It clarifies and expands the factual bases for certain Labor Code violations already noticed and adds related claims that have arisen from the same employment relationship.

All previously alleged violations remain incorporated by reference, including those under Labor Code §§ 201–203, 226(a), 3700–3722, 98.6, and 1102.5.

The following additional or clarified violations are asserted.

1. Improper Employer Identification on Wage Statements

Labor Code § 226(a)(8)

Employer’s wage statements failed to list the name and address of the legal entity that is the employer as required by Labor Code § 226(a)(8).

Each statement identified only Employer’s out-of-state headquarters address and omitted any California business address, even though Employer publicly represents that it maintains a California office and employs attorneys working “out of the firm’s California office.”

This omission rendered the statements inaccurate and misleading, impeding employees’ ability to contact the employer regarding pay records and rights.

2. Failure to Reimburse Necessary Business Expenses

Labor Code § 2802

Employer required Employee to perform all job duties remotely from his California home, which necessarily caused Employee to incur expenses including home internet service, mobile-phone usage, computer and printer supplies, utilities, and other office materials used to perform firm work.

Employer knew or had reason to know these expenses were incurred in direct consequence of the work but failed to reimburse or indemnify Employee as required by Labor Code § 2802.

3. Failure to Provide Complete Personnel Records

Labor Code § 1198.5

On or about October 7, 2025, Employee submitted a written request for his personnel file under Labor Code § 1198.5.

On October 23, 2025, Employer provided only a partial response, omitting performance evaluations and review materials, termination-related documents, vacation/PTO records, billing or productivity data, and COBRA or benefits-continuation communications.

Despite a follow-up written request identifying these missing categories, Employer has not provided a complete file.

The statutory 30-day compliance period expires November 6, 2025; Employer remains in ongoing violation of Labor Code § 1198.5.

Relationship to Prior Filing

Except as supplemented herein, all allegations in the original notice remain unchanged and are incorporated by reference.

This amendment adds related claims under §§ 226(a)(8), 2802, and 1198.5 that arise from the same course of employment and facts already within the LWDA's original notice period.

Requested Agency Action

Pursuant to Labor Code § 2699.3(a), the LWDA is requested to review this Amended Notice and determine whether to investigate these additional or clarified violations.

If the Agency elects not to investigate or fails to respond within 65 days of this amended filing, Employee intends to pursue a representative civil action under Labor Code § 2699 on behalf of himself and other aggrieved California employees.

Certification

I certify under penalty of perjury under the laws of the State of California that the facts stated herein are true and correct to the best of my knowledge and belief.

Date: October 30, 2025

Signature: 

Printed Name: Geoffrey K. Stauffer, Esq., CPA