

1 DARLA SCHOENROCK

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5 IN PRO PER

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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FOR THE COUNTY OF SONOMA

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11 Darla Schoenrock, Plaintiff(s),

Case No.: 26CV00796

12 vs.

**COMPLAINT FOR CIVIL PENALTIES
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT (PAGA)**

13 Petco Animal Supplies Stores, Inc., Defendant(s).

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21 COMPLAINT FOR CIVIL PENALTIES

22 UNDER THE PRIVATE ATTORNEYS GENERAL ACT (PAGA)

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PARTIES AND JURISDICTION

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27 1. Plaintiff Darla Schoenrock is an aggrieved employee within the meaning of California Labor
28 Code section 2699.

**ELECTRONICALLY FILED
Superior Court of California
County of Sonoma
1/29/2026 11:55 PM
By: Tyler Guyot, Deputy Clerk**

1 2. Defendant Petco Animal Supplies Stores, Inc. is a California employer that employed Plaintiff in
2 Sonoma County, California.

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4 PAGA NOTICE COMPLIANCE

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7 3. Plaintiff filed a Notice of Intent to File a PAGA Claim with the California Labor and Workforce
8 Development Agency (LWDA) on October 13, 2025.

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10 4. LWDA Case Number: LWDA-CM-1131251-25.

11 5. Plaintiff waited the statutory period of sixty-five (65) days.

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13 6. The LWDA did not elect to investigate or otherwise respond.

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15 7. Plaintiff now files this Complaint in compliance with California Labor Code sections 2699 et seq.

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17 STATEMENT OF VIOLATIONS

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19 8. Defendant committed violations of the California Labor Code, including but not limited to:

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21 a. Retaliation and discrimination for protected activity;

22 b. Unsafe workplace conditions in violation of Labor Code section 6300 et seq.;

23 c. Denial of legally required meal and rest periods;

24 d. Failure to provide a sanitary and healthful workplace;

25 e. Failure to reimburse necessary business expenses;

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f. Failure to pay all wages due;

g. Failure to provide compliant and timely final wages.

9. Plaintiff reserves the right to amend this Complaint to conform to proof and evidence as discovery proceeds.

FIRST CAUSE OF ACTION

(Civil Penalties Under the Private Attorneys General Act, Labor Code § 2699 et seq., by Plaintiff Darla Schoenrock against Defendant Petco Animal Supplies Stores, Inc.)

10. Plaintiff brings this action on behalf of herself and all other aggrieved employees pursuant to California Labor Code section 2699.

11. Defendant violated multiple provisions of the California Labor Code, giving rise to civil penalties recoverable under the Private Attorneys General Act.

12. Civil penalties are owed pursuant to Labor Code section 2699, with recovery allocated between the LWDA and aggrieved employees as required by law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that judgment be entered in her favor and against Defendant as follows:

1. Assessment and recovery of civil penalties under the Private Attorneys General Act;

- 1 2. Allocation of penalties, with seventy-five percent (75%) payable to the LWDA and twenty-five
2 percent (25%) payable to aggrieved employees;
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4 3. Recovery of reasonable attorneys' fees, even if Plaintiff represents herself in pro per;
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6 4. Recovery of costs of suit;
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8 5. Injunctive and/or equitable relief as the Court deems appropriate;
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10 6. Such other and further relief as the Court deems just and proper.
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12 DATED: January 25, 2026



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14 DARLA SCHOENROCK
15 In Pro Per
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