

October 20, 2025

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Agent for Service of Process for PAC Foundries, Inc.:
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833

Re: Erick Franco v. PAC Foundries, Inc.

Dear Labor and Workforce Development Agency and PAC Foundries, Inc.:

This letter shall serve as Erick Franco's ("Mr. Franco") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by PAC Foundries, Inc. ("PAC Foundries"), including the facts and theories to support the alleged violations. Mr. Franco intends to seek civil penalties against PAC Foundries under the Private Attorneys General Act of 2004 ("PAGA") on his own behalf and on behalf of all other non-exempt employees currently or formerly employed by PAC Foundries in California during the statutory period ("Aggrieved Employees"). Mr. Franco is informed and believes and based thereon alleges that there are at least 400 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Mr. Franco alleges PAC Foundries violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1194, 1194.2, 1197, 1197.1, 1198, 2802.

Facts and Theories Supporting Each Alleged Violation

Mr. Franco was employed by PAC Foundries in Port Hueneme, California as a non-exempt machinist from approximately June 2024 to approximately June 2025.

Minimum and Overtime Wages

Throughout the statutory period, PAC Foundries failed to pay Mr. Franco and other Aggrieved Employees at least the legal minimum wage and overtime wage for all hours worked due to PAC Foundries's policy and practice of failing to incorporate shift differentials and production bonuses in the regular rate of pay. As a result, PAC Foundries failed to pay Mr. Franco and other Aggrieved Employees for all minimum and overtime wages due in violation of Labor Code §§ 510, 558, 1194, 1194.2, 1197, 1197.1, and 1198.

Meal Periods

Throughout the statutory period, PAC Foundries failed to provide Mr. Franco and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Mr. Franco and other Aggrieved Employees frequently worked shifts over five hours

and did not receive lawful meal periods because they were discouraged from taking meal periods, were interrupted during their meal periods, were required to remain on call during meal periods, and/or were not scheduled to be relieved at the appropriate intervals to receive all lawful meal periods, among other reasons. PAC Foundries failed to pay Mr. Franco and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a meal period violation. As a result, PAC Foundries failed to provide meal periods and pay meal period premiums in violation of Labor Code §§ 226.7 and 512.

Reimbursement

Throughout the statutory period, PAC Foundries failed to reimburse necessary business expenditures in violation of Labor Code § 2802. Specifically, PAC Foundries made it necessary for Mr. Franco and other Aggrieved Employees to use their personal devices in order to download and access a mobile application called Workforce Dimensions. PAC Foundries failed to reimburse Mr. Franco and other Aggrieved Employees for this expense of using their personal devices for work purposes.

Rest Periods

Throughout the statutory period, PAC Foundries failed to authorize and permit Mr. Franco and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Mr. Franco and other Aggrieved Employees were required and/or incentivized to work through their rest periods, discouraged from taking their rest periods, required to remain on call during their rest periods, and/or were not relieved of all duties in order to take all rest periods. PAC Foundries failed to pay Mr. Franco and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a rest period violation. As a result, PAC Foundries failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

Wage Statements

Due to PAC Foundries's wage, meal period, rest period, and deduction violations as alleged above, PAC Foundries failed to provide Mr. Franco and other Aggrieved Employees with accurate, itemized wage statements that accurately reported gross wages earned, total hours worked, net wages earned, and all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate in violation of Labor Code § 226. This failure was knowing and intentional.

Timing of Wage Payments

Due to PAC Foundries's wage, meal period, rest period, and deduction violations as alleged above, PAC Foundries failed to pay all wages due during Mr. Franco's and other Aggrieved Employees' employment and at the end of their employment in violation of Labor Code §§ 201, 202, 203, 204, and 210. This failure was willful and intentional.

Recordkeeping

Due to PAC Foundries's wage, meal period, rest period, and deduction violations as alleged above, PAC Foundries failed to maintain accurate and complete records showing the hours worked each day by Mr. Franco and other Aggrieved Employees in violation of Labor Code §§ 1174 and 1174.5.



Based on these violations, Mr. Franco seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Mr. Franco will be filing on behalf of himself and all other Aggrieved Employees against PAC Foundries. Mr. Franco intends to amend the complaint to add a cause of action under PAGA 65 days after the date of this notice pursuant to Labor Code § 2699.3(a)(2)(A).

Thank you for your assistance on this matter. Should you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,
ABRAMSON LABOR GROUP

A handwritten signature in blue ink, appearing to read "Fawn F. Bekam", written in a cursive style.

Fawn F. Bekam

Enclosure: Class Action Complaint