

October 3, 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 Bill Brandt Ford, Inc.:
Robert Eugene Brandt
8100 Brentwood Blvd.
Brentwood, CA 94513

Re: Stephen Jurovich v. Bill Brandt Ford, Inc.

Dear Labor and Workforce Development Agency and Bill Brandt Ford, Inc.:

This letter shall serve as Stephen Jurovich's ("Mr. Jurovich") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by Bill Brandt Ford, Inc. ("Bill Brandt Ford"), including the facts and theories to support the alleged violations. Mr. Jurovich intends to seek civil penalties against Bill Brandt Ford under the Private Attorneys General Act of 2004 ("PAGA") on his own behalf and on behalf of all other employees currently or formerly employed by Bill Brandt Ford and paid commissions in California during the statutory period ("Aggrieved Employees"). Mr. Jurovich is informed and believes and based thereon alleges that there are at least 50 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Mr. Jurovich alleges Bill Brandt Ford violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198.

Facts and Theories Supporting Each Alleged Violation

Mr. Jurovich was employed by Bill Brandt Ford in Brentwood, California as an Internet Sales Consultant paid commissions from approximately February 14, 2022 to approximately August 10, 2025.

Minimum and Overtime Wages

Throughout the statutory period, Bill Brandt Ford failed to pay Mr. Jurovich and other Aggrieved Employees at least the legal minimum wage and overtime wage for all hours worked. Mr. Jurovich and other Aggrieved Employees were consistently required to work in excess of eight (8) hours a day and/or forty (40) hours a week, entitling Mr. Jurovich and other Aggrieved Employees to overtime wages. Mr. Jurovich and other Aggrieved Employees earned commission earnings and non-discretionary and performance-based bonuses in addition to their hourly rates of pay. However, these additional earnings were not factored in or considered when determining Mr. Jurovich's and other Aggrieved Employees' regular rates of pay, and respective sick and overtime rates of pay. Additionally, Mr. Jurovich and other Aggrieved Employees were paid on a draw-versus-commission basis. Mr. Jurovich and other Aggrieved Employees were not separately

compensated at their regular rate of pay for rest periods. As a result, Bill Brandt Ford failed to pay Mr. Jurovich and other Aggrieved Employees for all minimum, straight time, and overtime wages due in violation of Labor Code §§ 510, 558, 1182.12, 1194, 1194.2, 1197, 1197.1, and 1198.

Meal Periods

Throughout the statutory period, Bill Brandt Ford failed to provide Mr. Jurovich and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Mr. Jurovich 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. Further, when Mr. Jurovich and other Aggrieved Employees worked shifts over ten hours, they did not receive a second meal period. As a result, their meal periods were missed, late, short, and/or interrupted. Bill Brandt Ford failed to pay Mr. Jurovich 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, Bill Brandt Ford failed to provide meal periods and pay meal period premiums in violation of Labor Code §§ 226.7 and 512.

Rest Periods

Throughout the statutory period, Bill Brandt Ford failed to authorize and permit Mr. Jurovich and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Mr. Jurovich 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. Bill Brandt Ford failed to pay Mr. Jurovich 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, Bill Brandt Ford failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

Wage Statements

Due to Bill Brandt Ford's wage, meal period, rest period, and deduction violations as alleged above, Bill Brandt Ford failed to provide Mr. Jurovich 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 Bill Brandt Ford's wage, meal period, rest period, and deduction violations as alleged above, Bill Brandt Ford failed to pay all wages due during Mr. Jurovich'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 Bill Brandt Ford's wage, meal period, rest period, and deduction violations as alleged above, Bill Brandt Ford failed to maintain accurate and complete records showing the hours worked each day by Mr. Jurovich and other Aggrieved Employees in violation of Labor



Code §§ 1174 and 1174.5.

Based on these violations, Mr. Jurovich seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Mr. Jurovich will be filing on behalf of himself and all other Aggrieved Employees against Bill Brandt Ford. Mr. Jurovich 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 black ink that reads "Desiree Ruiz Alfaro". The signature is written in a cursive, flowing style.

Desiree Ruiz Alfaro

Enclosure: Class Action Complaint