

ATTORNEY GEOFFREY TAYLOR GIBBS

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October 3, 2025

VIA ONLINE UPLOAD AND FIRST-CLASS MAIL

Labor and Workforce Development Agency

PAGA Unit

P.O. Box 511

San Francisco, CA 94101-0511

Re: PAGA Notice Against Defense International Corporation

On Behalf of: Danny Lawton, Sherwyn Morgan, and 250 Similarly-Situated Employees

Total Aggrieved Employees: 252

Total Estimated Exposure: Exceeds \$11,000,000

To the Labor and Workforce Development Agency:

Pursuant to the California Labor Code § 2699.3(a), we hereby provide written notice to the Labor and Workforce Development Agency ("LWDA") of alleged systemic Labor Code violations by **DEFENSE INTERNATIONAL CORPORATION** ("the Employer"), with a principal place of business at 130 S. Prospect Avenue, Tustin, CA.

This notice is provided on behalf of our clients, the aggrieved employees, including named plaintiffs **Danny Lawton** and **Sherwyn Morgan**, and approximately **250** other similarly-situated non-exempt employees, for a total of **252** Aggrieved Employees.

The specific Labor Code provisions alleged to have been violated are detailed in the enclosed PAGA Notice Form (LWDA Form 1) and include, but are not limited to:

- Labor Code § 201 (Failure to Pay Final Wages)
- Labor Code § 203 (Waiting Time Penalties)
- Labor Code § 226(a) (Non-Compliant Itemized Wage Statements)
- Labor Code § 226.7 (Failure to Provide Lawful Meal and Rest Periods)
- Labor Code § 510 (Failure to Pay Overtime Wages)
- Labor Code § 1194 (Failure to Pay Minimum and Overtime Wages)
- Labor Code § 1197 (Violation of Minimum Wage Laws)

The violations arise from the Employer's uniform policies and practices, which include automatically deducting for meal periods not taken, discouraging and preventing off-duty rest breaks, failing to pay for all hours worked (including off-the-clock work), and failing to accurately calculate and pay overtime. These practices have resulted in the issuance of inaccurate wage statements and the failure to pay all wages due at termination.

Our preliminary analysis, based on an average hourly rate of \$20.00, estimates the total exposure for unpaid wages, premiums, and civil penalties under PAGA and the Labor Code to exceed **Eleven Million Dollars (\$11,000,000)**. A summary of this analysis is included for the LWDA's review.

Enclosed with this submission, you will find:

1. **Completed PAGA Notice Form (LWDA Form 1)**
2. **Summary of Damages Analysis**

A copy of this notice and all enclosed documents are being sent concurrently via certified mail to the Employer's registered agent for service of process:

CT Corporation System
330 N Brand Blvd, Ste 700
Glendale, CA 91203

We hereby request that the LWDA provide the notice required under Labor Code § 2699.3(a)(2)(A) if it does not intend to investigate the alleged violations.

Respectfully submitted,

/s/ Geoffrey T. Gibbs

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