



VIA ONLINE SUBMISSION

California Labor and Workforce Development

AgencyAttn: PAGA Administrator

Re: PAGA Notice of California Labor Code Claims against Atheneum Partners LLC

Dear PAGA Administrator:

This letter is submitted on behalf of Emily Kleinfelder, a former Associate at Atheneum Partners LLC (“Atheneum”). Ms. Kleinfelder worked at Atheneum from approximately January 2021 through September 2021. As set forth below, Ms. Kleinfelder alleges that Atheneum failed to pay her and other similarly situated employees as required by California law.

Ms. Kleinfelder alleges that Atheneum unlawfully failed to pay overtime compensation for all hours worked over 40 in a workweek and/or over eight hours in a workday to California Associates, in violation of Cal. Labor Code §§ 510, 1194, 1198 and the applicable Wage Order. Additionally, Ms. Kleinfelder alleges that Atheneum violated California law by: failing to provide meal and rest breaks; failing to timely pay wages during employment and upon separation; failing to provide accurate wage statements; and failing to keep accurate records.

This letter serves as notice of our intent to seek civil penalties pursuant to the Private Attorneys General Act (“PAGA”), Cal. Lab. Code §§ 2698 *et seq.*, on behalf of Ms. Kleinfelder and similarly situated Associates who worked for Atheneum in the State of California at any time in the past year. Ms. Kleinfelder alleges that Atheneum violated numerous provisions of the California Labor Code, including, but not limited to: Sections 201-204, 226, 226.7, 510, 512, 1174, 1194, 1198, and 2802 and provisions of the applicable Wage Order. Ms. Kleinfelder will seek all applicable civil penalties on behalf of herself and all similarly situated Associates, including but not limited to penalties pursuant to the aforementioned statutes and California Labor Code §§ 210, 218.5, 226.3, 226.6, 558, 1174.5, and 2699, and the applicable Wage Order.

The facts and claims contained herein are based on the limited information available at the time of this writing. Therefore, if through further review or informal or formal discovery, Ms. Kleinfelder becomes aware of additional compensation or penalties owed to her and other current or former Associates or of additional claims against Atheneum, she reserves the right to revise these facts and/or add any new claims by amending this letter.

Based on the foregoing, Ms. Kleinfelder intends to file a civil action to pursue claims against Atheneum and to seek PAGA remedies for these violations. Ms. Kleinfelder respectfully

requests that the Labor & Workforce Development Agency notify her if it intends to investigate the above allegations pursuant to PAGA.

Thank you for your attention to this matter. Please direct all communications and correspondence to our office going forward. If you have any questions, please do not hesitate to contact us at 202-830-2016.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sally J. Abrahamson', with a long horizontal flourish extending to the right.

Sally J. Abrahamson
Werman Salas P.C.