



M. Anthony Jenkins, Esq.
Senior Associate

anthony@aswtlawyers.com

April 7, 2023

Sent via Certified U.S. Mail

LABOR & WORKFORCE DEVELOPMENT AGENCY
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
Via Electronic Submission: <https://dir.tfaforms.net/308>

SPROUTS FARMERS MARKET, LLC
613 S. Harmon St
Santa Ana, CA 92704
Via Certified Mailing No.: 9414 8361 0426 2666 4611 95

*Re: Isaac Diaz. vs. Sprouts Farmers Markets, LLC
California Labor Code § 2699 Penalties*

To Whom It May Concern:

Please take notice that pursuant to the procedures specified in the Private Attorneys General Act of 2004, California Labor Code §§ 2698-2699.5, Isaac Diaz (hereinafter referred to as "Plaintiff") on behalf of himself and all other current and former and all other individuals employed by Sprouts Farmers Markets, LLC ("EMPLOYER") as a Store Manager, Assistant Store Manager, Service Manager, Perishable Manager, Non-Perishable Manager or Key Holder in California (hereinafter referred to as "EMPLOYEES," inclusive of Plaintiff), hereby claims that EMPLOYER committed the Labor Code violations set forth herein against EMPLOYEES, all of whom are aggrieved employees. This notice also is also based on the draft First Amended Complaint included with the letter and incorporated by reference.

At all times relevant, it has been EMPLOYER's policy, practice and procedure to require EMPLOYEES to personally incur and pay for cell phone (or similar device) usage business expenses incurred as a condition of and in the performance of their job duties in violation of California Labor Code section 2802, for which Plaintiff seeks on behalf of the State of California, himself and all other aggrieved employees, the recovery of civil penalties under Labor Code section 2699(f), plus an award of attorney fees as authorized by Labor Code section 2699(g), and all other applicable penalties.

Plaintiff wishes to bring a representative action on behalf of himself and the State of California as well as on behalf the following group of aggrieved EMPLOYEES defined as:

6701 Center Drive West, #1400, Los Angeles, CA 90045 | Tel (310) 844-9696 • Fax (310) 861-0168

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Each person employed by Sprouts Farmers Markets, LLC as a Store Manager, Assistant Store Manager, Service Manager, Perishable Manager, Non-Perishable Manager or Key Holder in California who worked one or more pay periods at any time since one (1) year prior to the date of this letter.

Plaintiff respectfully requests that the California Labor & Workforce Development Agency immediately investigate the alleged violations asserted in this letter against EMPLOYER in accordance with California Labor Code §§ 2698 – 2699.5.

Very truly yours,

**ARIAS, SANGUINETTI, WANG
& TORRIJOS, LLP**



M. Anthony Jenkins