

MOON & DORSETT, PC

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LOS ANGELES, CA 90071

TELEPHONE 213.380.1526

November 17, 2025

VIA LWDA PAGA PORTAL
Labor and Workforce Development Agency
Private Attorneys General Act (PAGA) Coordinator

AND

VIA CERTIFIED MAIL
HANWHA SEMITECH AMERICA, INC.
Attention: Legal Department/PAGA Notice
6000 Phyllis Drive
Cypress, CA 90630

Re: Notice of Violations of the Labor Code Pursuant to the Private Attorneys General Act of 2004 (PAGA), Labor Code §2698, *et seq.* on behalf of Aggrieved Employee EUN KO

Dear PAGA Unit:

This firm represents Ms. Eun Ko (“Ms. Ko”) and seeks civil penalties under PAGA for the following violations committed by HANWHA SEMITECH AMERICA, INC. (the “Employer”) against Ms. Ko and other current and former Aggrieved Employees during the applicable one-year PAGA statutory period.

Ms. Ko was employed by the Employer from approximately January 1, 2022, through September 30, 2025.

I. Violations of the California Labor Code

The Employer engaged in a pattern and practice of violations across the following Labor Code sections.

A. Labor Code § 1102.5- Whistleblower Retaliation

The Employer violated Labor Code § 1102.5 by retaliating against Ms. Ko for engaging in protected activity, which ultimately resulted in her adverse employment action.

Protected Activity: In May 2025, Ms. Ko submitted a formal petition email to the corporate headquarters reporting financial mismanagement, lack of internal controls

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(specifically, a single individual controlling both Finance and HR in violation of separation of duties), and a hostile work environment on behalf of herself and other employees. This disclosure to persons with authority constitutes protected activity under section 1102.5.

Adverse Action: In **Late August – September 2025**, months after the protected report, the new corporate representative unilaterally and without explanation removed Ms. Ko's Team Leader position and associated retention benefits (a \$400 monthly team leader allowance and a \$200 monthly education support), in direct retaliation for her protected disclosure.

Violated Code Sections: § 1102.5.

B. Labor Code §§ 512 & 226.7 - Meal Period Violations

The Employer failed to provide Ms. Ko and other Aggrieved Employees with compliant meal periods, including failing to relieve employees of all duty and failing to provide a second meal period when hours worked exceeded ten (10) hours.

Sufficient Facts: Ms. Ko's required work schedule of 8:30 AM to 7:00 PM was 10.5 hours per day, frequently resulting in uncompensated work through a missed or non-compliant meal break.

Violated Code Sections: §§ 226.7, 512.

C. Labor Code §226.7 - Rest Period Violations

The Employer failed to authorize and permit compliant rest periods, including failing to provide a second compliant rest period for shifts exceeding six (6) hours.

Sufficient Facts: Ms. Ko was denied at least one compliant rest break per day.

Violated Code Sections: §226.7.

D. Labor Code §§ 510, 1194 & 1198 - Failure to Pay Overtime Wages

The Employer failed to pay proper overtime and double time wages for all hours worked over eight (8) in a day and/or over forty (40) in a workweek, including failing to capture the full time Ms. Ko worked (8:30 AM to 7:00 PM).

Sufficient Facts: This resulted in **\$58,848.32** in uncompensated overtime and double time wages.

Violated Code Sections: §§ 510, 1194, 1198.

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E. Labor Code § 226- Inaccurate Wage Statements

The Employer provided wage statements that failed to accurately reflect the total number of hours worked, the correct overtime rates, and the mandatory premium payments for missed meal and rest periods.

Sufficient Facts: Penalties are sought up to the statutory maximum of **\$4,000.00**.

Violated Code Sections: § 226.

II. PAGA Penalties Sought

Ms. Ko seeks to recover all civil penalties as permitted under Labor Code section 2699, calculated at the maximum statutory rate for all violations against Ms. Ko and the other Aggrieved Employees during the relevant period.

This Notice is submitted to allow the LWDA the opportunity to investigate the violations alleged and advise as to any intent to commence an investigation. Should the LWDA not respond within the statutory timeframe, the Aggrieved Employee intends to proceed with a civil action to recover penalties for these Labor Code violations.

Sincerely,



Dana Moon, Esq.
MOON & DORSETT, PC

PROOF OF SERVICE

I am over 18 years of age and not a party to the within action; my business address is 445 South Figueroa St., Suite 2900, Los Angeles, CA 90071.

On November 17, 2025, I served a true copy of

Notice of Violations of the Labor Code Pursuant to the Private Attorneys General Act of 2004 (PAGA), Labor Code §2698, et seq. on behalf of Aggrieved Employee EUN KO

to:

HANWHA SEMITECH AMERICA, INC.
Attention: Legal Department/PAGA Notice
6000 Phyllis Drive
Cypress, CA 90630

(x) BY CERTIFIED MAIL AND ACKNOWLEDGEMENT SERVICE: I mailed the pages above to the parties and to the addresses shown above by certified mail with return receipt requested.

I certify under penalty of perjury, under the laws of the State of California and the United States, that the foregoing is true and correct.

Executed on November 17, 2025, at Los Angeles, California.



Hannah Lee, Declarant