



November 3, 2025

ELECTRONICALLY FILED
AND U.S.P.S. CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Attn: PAGA Administrator
Labor and Workforce Development Agency
1515 Clay Street, Suite 801
Oakland, California 94612
Email: PAGAFilings@dir.ca.gov

Re: Private Attorneys General Act of 2004 Notice

Employee: Vanessa Morris

Employer: American Funds Service Company; Capital Group International, Inc., and Other Related Entities

Dear PAGA Administrator:

Pursuant to Cal. Lab. Code § 2699.3(a), Vanessa Morris (“Plaintiff”) hereby notifies the California Labor & Workforce Development Agency (“LWDA”) that she intends to seek civil penalties and injunctive relief pursuant to Cal. Lab. Code §§ 2699(a), (e), (f), and (k) against American Funds Service Company, Capital Group International, Inc., and any unknown related entities involved in the violations alleged (collectively “Employers” or “Defendants”), for its violations of the California Labor Code and applicable Industrial Welfare Commission (“IWC”) Wage Order(s), including, but not limited to:

- Cal. Lab. Code §§ 200, 204, 510, 1182.12, 1194, 1197, and 1198 and applicable Wage Orders (violations regarding payment of wages, including timeliness, overtime pay);
- Cal. Lab. Code § 2802 and applicable Wage Orders (failure to reimburse work expenses);
- Cal. Lab. Code § 1174 and applicable Wage Orders (failure to maintain accurate records);
- Cal. Lab. Code §§ 200, 204, 201-203, 256 (failure to pay all wages due and owing during and following separation); and
- Cal. Lab. Code § 226 (failure to provide accurate itemized wage statements).

Throughout the Relevant Period, Defendants committed, and continue to commit, the acts herein alleged maliciously, fraudulently, and oppressively against Plaintiff and Aggrieved Employees.¹

¹ “Relevant Period” includes the one-year period preceding the date of this letter. “Aggrieved Employees” has the same meaning as defined in Cal. Lab. Code § 2699(c)(1).



Background of Defendants:

Defendant American Funds Service Company provides a wide range of investment products and services, including mutual funds, exchange-traded funds, fixed-income investments, and retirement plans.

Defendant Capital Group International, Inc. is an investment management firm that provides long-term investment management services and products, such as mutual funds, ETFs, and private equity, to individual, institutional, and intermediary clients.

Defendants jointly exercised control over Plaintiff and Aggrieved Employees with respect to their employment. Defendants employ Plaintiff and Aggrieved Employees because Defendants, directly or indirectly, control the employment terms, pay practices, timekeeping practices, and daily work of Plaintiff and Aggrieved Employees.

Upon information and belief, Defendants were and are employers or acting on behalf of employers of Plaintiff and Aggrieved Employees.

Background of Plaintiff:

Plaintiff has been employed by Defendants in California as a Client Service Representative since approximately July 2022. Plaintiff is compensated at an hourly rate of approximately \$26. While Plaintiff's shifts varied in length, she worked at least eight (8) hours per shift, five (5) shifts per week. Plaintiff worked approximately forty (40) hours or more per week.

Failure to Compensate All Hours Worked and to Pay Overtime Wages:

Defendants deny Plaintiff and Aggrieved Employees proper compensation for all hours worked, including overtime wages. Defendants provides Plaintiff and Aggrieved Employees with non-discretionary bonuses once or twice per year, based on Defendant's profitability and an employee's individual performance. These bonuses are not factored into the calculation of the regular rate for Plaintiff and Aggrieved Employees' overtime wages. As a result, the Defendants do not compensate Aggrieved Employees with their appropriate overtime rate of pay for hours worked in a day over eight (8) hours or over forty (40) hours in a week, giving rise to overtime violations.

Upon information and belief, Defendants follow a similar policy of not compensating employees their appropriate overtime rate, factoring bonuses and any additional compensation, across California that results in hundreds of Aggrieved Employees performing services for the benefit of Defendants. This gives rise to overtime violations. To the extent overtime payments were made, they were not paid at the proper rate. Defendants' failure to timely pay wages was/is willful and/or intentional.

Failure to Reimburse Business Expenses:

Defendants also deny Plaintiff and Aggrieved Employees proper reimbursement for



business expenditures. Plaintiff and Aggrieved employees are remote employees constantly required to provide their own personal internet connection and to use their personal cell phones in the performance of their work duties. However, Defendants do not reimburse Plaintiffs and Aggrieved Employees for such expenses, even though they should be fully reimbursed under California law. Defendants' failure to properly reimburse Plaintiff and Aggrieved Employees' necessarily incurred business expenses gives rise to violations of Cal. Lab. Code § 2802. Upon information and belief, Defendants institute the same or substantially similar policy throughout California that results in hundreds of Aggrieved Employees not being reimbursed for business expenditures incurred for the benefit of Defendants. Defendants' failure to provide reimbursements for these necessary business expenses was/is willful and/or intentional.

Failure to Pay All Wages Due and Owing During Employment and Following Separation:

As a consequence of Defendants' failure to pay for all hours worked, including overtime wages as well as Defendant's failure to pay such overtime wages at the correct overtime rate, Plaintiff and Aggrieved Employees do not receive all wages owed during employment. Additionally, Aggrieved Employees who are Defendants' former employees did not receive all wages owed following separation from employment. Defendants' failure to timely pay earned wages to Plaintiff and other former Aggrieved Employees was/is willful and/or intentional.

Failure to Maintain Accurate Records:

As a consequence of the foregoing, Defendants fail to maintain accurate records of time worked, and wages earned, and such failure was/is willful and/or intentional.

Failure to Provide Timely & Itemized Wage Statements:

As outlined above, Plaintiff and Aggrieved Employees perform a substantial amount of work which goes uncompensated at the correct overtime time rate and are not reimbursed for business expenditures. Therefore, Plaintiff and Aggrieved Employees do not receive accurate, itemized wage statements in accordance with Cal. Lab. Code §226. Defendants knowingly and intentionally fail to provide a wage statement that omits and/or inaccurate states the gross wages earned, total hours worked, all deductions, 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 by the employee." For example, in Plaintiff's wage statement, the total gross and net wages earned are inaccurate because they do not include overtime/double time wages paid that factor non-discretionary bonuses into their regular rate of pay. Plaintiff and Aggrieved Employees cannot promptly and easily determine from the wage statement alone their accurate gross wages earned, total hours worked, all deductions, 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 by the employee."

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Plaintiff is represented by Schneider Wallace Cottrell Kim LLP ("SWCK"), a law firm based in Emeryville, California. SWCK has extensive experience in the successful litigation and



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resolution of employment and representative actions nationwide. A description of the work, mission, and credentials of the firm can be found at www.schneiderwallace.com. Plaintiff and SWCK are committed to zealously pursuing redress on behalf of the State of California and all other Aggrieved Employees for the violations set forth above.

Very Truly Yours,

**SCHNEIDER WALLACE
COTTRELL KIM LLP**

Carolyn H. Cottrell
Attorney at Law

Admitted in California

cc via U.S.P.S. Certified Mail - Return Receipt Requested:

American Funds Service Company

c/o Registered Agent for Service of Process
CT Corporation System
330 N. Brand Blvd., Suite 700
Glendale, California 91203

Capital Group International, Inc.

c/o Registered Agent for Service of Process
CT Corporation System
330 N. Brand Blvd., Suite 700
Glendale, California 91203