

November 10, 2025

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Agent for Service of Process for Via Care Community Health Center, Inc.:
Christina Olivia Bugarin
501 S. Atlantic Blvd.
Los Angeles, CA 90022

Re: Flor Estrada v. Via Care Community Health Center, Inc.

Dear Labor and Workforce Development Agency and Via Care Community Health Center, Inc.:

This letter shall serve as Flor Estrada's ("Ms. Estrada") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by Via Care Community Health Center, Inc. ("Via Care"), including the facts and theories to support the alleged violations. Ms. Estrada intends to seek civil penalties against Via Care under the Private Attorneys General Act of 2004 ("PAGA") on her own behalf and on behalf of all other non-exempt employees currently or formerly employed by Via Care in California during the statutory period ("Aggrieved Employees"). Ms. Estrada is informed and believes and based thereon alleges that there are at least 250 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Ms. Estrada alleges Via Care violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1194, 1194.2, 1197, 1197.1, 1198, 2802.

Facts and Theories Supporting Each Alleged Violation

Ms. Estrada has been employed by Via Care in Bellflower, California as a non-exempt ECM care manager since approximately August 2020.

Minimum and Overtime Wages

Throughout the statutory period, Via Care failed to pay Ms. Estrada and other Aggrieved Employees at least the legal minimum wage and overtime wage for all hours worked due to Via Care's policy and practice of failing to pay for all hours worked, including time spent under Via Care's control while on call. As a result, Via Care failed to pay Ms. Estrada and other Aggrieved Employees for all minimum, straight time, and overtime wages due in violation of Labor Code §§ 510, 558, 1194, 1194.2, 1197, 1197.1, and 1198.

Meal Periods

Throughout the statutory period, Via Care failed to provide Ms. Estrada and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Ms. Estrada and other Aggrieved Employees frequently worked shifts over five hours



and did not receive lawful meal periods because they were discouraged from taking meal periods, were interrupted during their meal periods, were required to remain on call during meal periods, and/or were not scheduled to be relieved at the appropriate intervals to receive all lawful meal periods, among other reasons. Via Care failed to pay Ms. Estrada and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a meal period violation. As a result, Via Care failed to provide meal periods and pay meal period premiums in violation of Labor Code §§ 226.7 and 512.

Rest Periods

Throughout the statutory period, Via Care failed to authorize and permit Ms. Estrada and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Ms. Estrada and other Aggrieved Employees were required and/or incentivized to work through their rest periods, discouraged from taking their rest periods, required to remain on call during their rest periods, and/or were not relieved of all duties in order to take all rest periods. Via Care failed to pay Ms. Estrada and other Aggrieved Employees an additional hour of pay at their regular rate of pay when they suffered a rest period violation. As a result, Via Care failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

Reimbursement

Throughout the statutory period, Via Care failed to reimburse necessary business expenditures in violation of Labor Code § 2802. Specifically, Via Care made it necessary for Ms. Estrada and other Aggrieved Employees to use their personal devices in order to communicate with Via Care while on call. Via Care failed to reimburse Ms. Estrada and other Aggrieved Employees for this expense of using their personal devices for work purposes.

Wage Statements

Due to Via Care's wage, meal period, and rest period violations as alleged above, Via Care failed to provide Ms. Estrada and other Aggrieved Employees with accurate, itemized wage statements that accurately reported gross wages earned, total hours worked, 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 in violation of Labor Code § 226. This failure was knowing and intentional.

Timing of Wage Payments

Due to Via Care's wage, meal period, and rest period violations as alleged above, Via Care failed to pay all wages due during Ms. Estrada's and other Aggrieved Employees' employment and at the end of their employment in violation of Labor Code §§ 201, 202, 203, 204, and 210. This failure was willful and intentional.

Recordkeeping

Due to Via Care's wage, meal period, and rest period violations as alleged above, Via Care failed to maintain accurate and complete records showing the hours worked each day by Ms. Estrada and other Aggrieved Employees in violation of Labor Code §§ 1174 and 1174.5.

Based on these violations, Ms. Estrada seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Ms. Estrada will be filing on behalf of herself and all other Aggrieved Employees



against Via Care. Ms. Estrada intends to amend the complaint to add a cause of action under PAGA 65 days after the date of this notice pursuant to Labor Code § 2699.3(a)(2)(A).

Thank you for your assistance on this matter. Should you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,
ABRAMSON LABOR GROUP

A handwritten signature in blue ink, appearing to read "Fawn F. Bekam", is written over a light blue rectangular background.

Fawn F. Bekam

Enclosure: Class Action Complaint