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SUPERIOR COURT OF CALIFORNIA

COUNTY OF RIVERSIDE

PHILIP DOLGOVIN, individually and on behalf of the State of California and Aggrieved Employees,

Plaintiff,

vs.

PIC CAPITAL, INC., a California Corporation; and DOES 1 through 10, Inclusive,

Defendants.

Case No. CVRI2602187

PRIVATE ATTORNEYS GENERAL ACT OF 2004 COMPLAINT FOR:

1. Civil Penalties Pursuant to Labor Code § 2699(a); and
2. Civil Penalties Pursuant to Labor Code § 2699(f).

[UNLIMITED JURISDICTION]

COMES NOW Plaintiff PHILIP DOLGOVIN ("Dolgovin" or "Plaintiff") on behalf of himself, the State of California, and all other Aggrieved Employees, hereby brings this Representative Action Complaint against Defendant PIC CAPITAL, INC., and DOES 1 through 10 ("PIC Capital" or "Defendants"), inclusive, and alleges as follows:

SUMMARY

1. Dolgovin, and the Aggrieved Employees, on behalf of the State of California, brings this enforcement action pursuant to the California Labor Code Private Attorneys General Act of 2004, as amended ("PAGA"), against PIC Capital on behalf of individuals who work for or have worked for PIC Capital and who have been denied minimum wages, denied overtime wages, not provided compliant meal and/or rest periods, not paid premium compensation for missed meal and rest periods, not timely paid all wages owed, not paid all wages owed upon separation of employment, not provided accurate and compliant itemized wage statements, and/or not provided wage-statement records upon request, at any time since one year and 65 days before the filing of this Complaint through final resolution of this Action (the "Aggrieved Employees").

2. PIC Capital employs Dolgovin, and the Aggrieved Employees, as non-exempt Loan Officers and compensates them pursuant to commission-based and hourly compensation structures governed by the California Labor Code and applicable Industrial Welfare Commission Wage Orders, including IWC Wage Order No. 4-2001.

3. Dolgovin, and the Aggrieved Employees, regularly worked more than eight (8) hours in a day and more than forty (40) hours in a workweek.

4. Despite this, PIC Capital failed to pay Dolgovin, and the Aggrieved Employees, all straight-time and overtime wages owed for all hours worked, including overtime hours worked in excess of eight (8) hours in a day and forty (40) hours in a workweek, in violation of Lab. Code §§ 510, 1194.

5. PIC Capital further failed to ensure that Dolgovin, and the Aggrieved Employees, received at least the applicable minimum wage for all hours worked, including by manipulating hours worked, issuing paychecks reflecting zero hours despite work performed, and failing to honor guaranteed minimum compensation agreements, in violation of Lab. Code § 1194.

6. As a result of PIC Capital's policies and practices, Dolgovin, and the Aggrieved Employees, were not paid all wages owed during employment, including regular wages, minimum wages, and overtime wages, in violation of Lab. Code § 204.

7. In addition, PIC Capital frequently failed to authorize, permit, and make available compliant meal periods to Dolgovin, and the Aggrieved Employees, as required by the California Labor Code and IWC Wage Order No. 4-2001, including by requiring them to remain on duty, answer phones, or otherwise perform work during meal periods, in violation of Lab. Code § 512.

8. PIC Capital also failed to authorize and permit compliant rest periods to Dolgovin, and the Aggrieved Employees, and instead required them to remain available for work during rest periods, in violation of Lab. Code § 226.7.

9. PIC Capital further failed to pay Dolgovin, and the Aggrieved Employees, premium wages owed for missed, delayed, or denied meal and rest periods, as required by the California Labor Code and IWC Wage Order No. 4-2001.

10. PIC Capital's unlawful compensation and break practices resulted in non-compliant wage statements. Among other things, the itemized wage statements provided to Dolgovin, and the Aggrieved Employees, failed to accurately reflect total hours worked, applicable hourly rates, gross wages earned, net wages earned, and wages owed, in violation of Lab. Code § 226(a).

11. PIC Capital also failed to maintain complete and accurate payroll records for Dolgovin, and the Aggrieved Employees, including records of hours worked and wages paid, in violation of Lab. Code §§ 1174, 1174.5.

12. Because PIC Capital failed to pay all wages owed during employment, Dolgovin, and the Aggrieved Employees, who are former employees of PIC Capital did not receive all wages owed at the time of separation from employment, in violation of Lab. Code §§ 201–204.

13. Additionally, Dolgovin, and the Aggrieved Employees, submitted written requests for copies and inspection of wage-statement records pursuant to Lab. Code § 226(b)–(c). PIC Capital received those requests, more than twenty-one (21) days elapsed, and PIC Capital failed to timely provide the requested wage-statement records, in violation of the Labor Code.

14. Dolgovin, and the Aggrieved Employees, bring this Action pursuant to PAGA to challenge PIC Capital's policies and practices of: (1) failing to pay minimum wages; (2) failing to pay overtime wages; (3) failing to provide compliant meal periods; (4) failing to provide compliant rest periods; (5) failing to pay all wages owed during employment; (6) failing to timely pay all wages owed upon separation of employment; (7) failing to maintain accurate payroll records; (8) failing to provide accurate, itemized wage statements; and (9) failing to provide wage-statement records upon request, all in violation of the California Labor Code and IWC Wage Order No. 4-2001.

15. Dolgovin, and the Aggrieved Employees, seek recovery of all civil penalties and other relief available under PAGA on behalf of the State of California and the Aggrieved Employees.

16. This Action seeks to remedy the unlawful compensation, payroll, and recordkeeping practices that PIC Capital has imposed and continues to impose on its workers in California, which deprive Dolgovin, and the Aggrieved Employees, of their lawfully earned wages and statutory protections.

The Parties

17. Dolgovin and the Aggrieved Employees were employed by PIC Capital as a Loan Officer from approximately January 1, 2020, through May 27, 2022.

18. Throughout his employment, PIC Capital classified Dolgovin, and the Aggrieved Employees, as non-exempt employees and compensated them pursuant to commission-based and hourly compensation structures subject to the California Labor Code and applicable Industrial Welfare Commission Wage Orders, including IWC Wage Order No. 4-2001.

19. Dolgovin and the Aggrieved Employees bring this action on behalf of the State of California and on behalf of all of PIC Capital's current and former non-exempt employees employed in California who suffered one or more of the Labor Code violations suffered by Dolgovin and the Aggrieved Employees, as enumerated in Lab. Code §§ 2698 *et seq.*, and who worked for PIC Capital at any time since one year and 65 days before the filing of this Complaint through final resolution of this Action.

20. These employees are referred to herein as the "Aggrieved Employees."

21. Dolgovin, and the Aggrieved Employees, is an "Aggrieved Employee" within the meaning of Lab. Code § 2699(c) because PIC Capital employed him, and he suffered one or more of the alleged Labor Code and/or Wage Order violations committed by PIC Capital within the relevant limitations period.

22. Dolgovin, and the Aggrieved Employees, and the other Aggrieved Employees were employees of PIC Capital at all relevant times, as defined by the California Labor Code and the applicable IWC Wage Order(s).

23. PIC Capital is a California corporation with its principal place of business in Corona, California. PIC Capital may be served through its registered agent for service of process, **Brian Sardarizadeh, at 3945 Shady Ridge Dr., Corona, California 92881**.

24. At all relevant times, PIC Capital was Dolgovin's, and the Aggrieved Employees', employer and/or a person acting on behalf of the employer, whether individually or as an owner, officer, agent, or managing employee, within the meaning of Lab. Code § 1197.1, that paid or caused to be paid to Dolgovin, and the Aggrieved Employees, wages less than the minimum wages fixed by California law, failed to pay overtime wages, failed to provide compliant meal and rest periods, failed to pay all wages owed during and upon separation of employment, failed to maintain accurate payroll records, and failed to provide compliant wage statements and wage-statement records, and is therefore subject to civil penalties under the California Labor Code and PAGA.

Jurisdiction & Venue

25. This Court has jurisdiction over the State of California's claims for civil penalties, by and through Dolgovin, and the Aggrieved Employees, as the deputized PAGA representative, pursuant to the California Constitution, Article VI, § 10, which grants the Superior Court original jurisdiction over all causes except those given by statute to other courts. The statute under which this Action is brought does not specify any other basis for jurisdiction.

26. Dolgovin, and the Aggrieved Employees, electronically filed a written PAGA Notice with the California Labor and Workforce Development Agency ("LWDA") on December 16, 2025, as required by Lab. Code § 2699.3.

27. This Court has personal jurisdiction over PIC Capital because PIC Capital is

registered to do business in California, maintains its principal place of business in California, and has purposefully availed itself of the benefits of the State by conducting business in California and employing workers there, including Dolgovin, and the Aggrieved Employees.

28. Venue is proper in this judicial district pursuant to Code Civ. Proc. §§ 393 and/or 395.5.

29. PIC Capital employed Dolgovin, and the Aggrieved Employees, within Riverside County.

30. PIC Capital conducts business in Riverside County, employs Dolgovin, and the Aggrieved Employees, in Riverside County, and the acts and omissions giving rise to liability under PAGA occurred in Riverside County.

Factual Allegations

31. PIC Capital operates a mortgage and loan services business in California and employs Loan Officers to originate, process, and service residential loan products.

32. To meet its business objectives, PIC Capital employs non-exempt employees, including Dolgovin, and the Aggrieved Employees, to perform loan origination, client communication, documentation, and related administrative and sales functions essential to PIC Capital's operations.

33. PIC Capital classified Dolgovin, and the Aggrieved Employees, as non-exempt employees and compensated them pursuant to commission-based and hourly compensation structures subject to the California Labor Code and applicable Industrial Welfare Commission Wage Orders, including IWC Wage Order No. 4-2001.

34. While exact job titles and duties may vary, Dolgovin, and the Aggrieved Employees, were subjected to the same or similar unlawful compensation, payroll, and recordkeeping policies and practices.

35. Dolgovin and the Aggrieved Employees worked for PIC Capital from approximately January 1, 2020, through May 27, 2022, primarily in Riverside County, California.

36. As a Loan Officer, Dolgovin's, and the Aggrieved Employees', primary job duties included originating loans, communicating with borrowers, processing loan applications,

coordinating documentation, and performing related administrative and sales tasks for PIC Capital's benefit and under its control.

37. PIC Capital did not provide Dolgovin and the Aggrieved Employeeswith a reliable or lawful timekeeping system to accurately record all hours worked.

38. Throughout their employment, Dolgovin, and the Aggrieved Employees, regularly worked more than eight (8) hours in a workday and more than forty (40) hours in a workweek.

39. Indeed, Dolgovin, and the Aggrieved Employees, routinely worked long hours, including extended weekdays and weekends, to meet PIC Capital's productivity demands and client expectations.

40. Despite this, PIC Capital failed to pay Dolgovin, and the Aggrieved Employees, for all hours worked, including overtime hours worked in excess of eight (8) hours in a day and forty (40) hours in a week, in violation of Lab. Code §§ 510, 1194.

41. PIC Capital also failed to ensure that Dolgovin, and the Aggrieved Employees, received at least the applicable minimum wage for all hours worked, including by manipulating recorded hours, issuing paychecks reflecting zero hours despite work performed, and failing to honor guaranteed minimum compensation agreements, in violation of Lab. Code § 1194.

42. As a result of these practices, PIC Capital failed to pay Dolgovin, and the Aggrieved Employees, all straight-time wages owed for all hours worked, in violation of Lab. Code § 204.

43. Further, PIC Capital frequently failed to authorize, permit, and make available compliant meal periods to Dolgovin, and the Aggrieved Employees, as required by the California Labor Code and IWC Wage Order No. 4-2001.

44. Instead, PIC Capital required Dolgovin, and the Aggrieved Employees, to remain on duty, answer phones, respond to clients, or otherwise perform work during meal periods, in violation of Lab. Code § 512.

45. PIC Capital likewise failed to authorize and permit compliant rest periods to Dolgovin, and the Aggrieved Employees, and instead required them to remain available for work throughout their shifts, in violation of Lab. Code § 226.7.

46. PIC Capital failed to pay Dolgovin, and the Aggrieved Employees, the required

premium wages for each workday on which compliant meal or rest periods were denied, in violation of the California Labor Code and IWC Wage Order No. 4-2001.

47. PIC Capital's unlawful compensation and break practices resulted in inaccurate and non-compliant wage statements.

48. Throughout their employment, PIC Capital failed to provide Dolgovin, and the Aggrieved Employees, with itemized wage statements that accurately reflected all hours worked, applicable hourly rates, gross wages earned, net wages earned, and wages owed, in violation of Lab. Code § 226(a).

49. PIC Capital also failed to maintain complete and accurate payroll records for Dolgovin, and the Aggrieved Employees, including accurate records of hours worked and wages paid, in violation of Lab. Code §§ 1174, 1174.5.

50. Because PIC Capital failed to pay all wages owed during employment, Dolgovin, and the Aggrieved Employees, who are former employees did not receive all wages owed upon separation from employment, in violation of Lab. Code §§ 201–204.

51. Dolgovin, and the Aggrieved Employees, submitted written requests for copies and inspection of wage-statement records pursuant to Lab. Code § 226(b)–(c).

52. PIC Capital received those requests, more than twenty-one (21) days elapsed, and PIC Capital failed to timely provide the requested wage-statement records.

53. PIC Capital subjected the other Aggrieved Employees to the same unlawful policies, practices, and procedures imposed on Dolgovin, and the Aggrieved Employees.

54. PIC Capital knew or should have known that Dolgovin, and the Aggrieved Employees, were performing compensable work for its benefit and under its control and that it was required to pay them for all hours suffered or permitted to be worked.

55. Despite this knowledge, PIC Capital failed to exercise its duty as an employer to ensure that Dolgovin, and the Aggrieved Employees, were properly compensated in compliance with California law.

56. PIC Capital's violations of the California Labor Code were willful, systematic, and carried out in bad faith, causing ongoing harm to Dolgovin, and the Aggrieved Employees, and

entitling the State of California to recover civil penalties under PAGA.

PAGA Notice Requirement

57. Dolgovin exhausted the notice requirement by filing a notice with the LWDA, as required under the PAGA, as stated in their letter dated December 16, 2025. A true and correct copy of Dolgovin's letter is attached hereto as **Exhibit A** and is incorporated herein by reference.

58. As of the filing of this complaint, the LWDA has not provided notice of its intent to investigate the alleged violations, nor has it assumed jurisdiction over the applicable penalty claims alleged. Therefore, Dolgovin has exhausted the procedural requirements under PAGA to pursue all civil penalty claims.

59. Throughout the relevant time period, PIC Capital employed numerous other non-exempt employees in California, who, on information and belief, were subjected to the same unlawful policies and practices described herein. As a direct result of PIC Capital's unlawful policies and practices, Dolgovin and Aggrieved Employees have suffered harm. They are entitled to recover civil penalties pursuant to Labor Code §§ 2698, *et seq.*

Count I

Penalties Pursuant to Labor Code § 2699(a)

60. Dolgovin incorporates all other paragraphs by reference.

61. Labor Code § 2699(a) provides:

> Notwithstanding any other provision of law, any provision of this code that provides for a civil penalty to be assessed and collected by the Labor and Workforce Development Agency or any of its departments, divisions, commissions, boards, agencies or employees, for a violation of this code, may, as an alternative, be recovered through a civil action brought by an aggrieved employee on behalf of himself or herself and other current or former employees.

62. Labor Code § 203 provides, in relevant part:

> If an employer willfully fails to pay, without abatement or reduction, in accordance with Sections 201, 201.5, 202, and 205.5, any wages of an employee who is discharged or who quits, the wages of the employee shall continue as a penalty from the due date thereof at the same rate until paid or until an action therefore is commenced; but the wages shall not continue for

more than 30 days.

63. Labor Code § 226(a) provides:

> Every employer shall, semimonthly or at the time of each payment of wages, furnish each of his or her employees, either as a detachable part of the check, draft, or voucher paying the employee's wages, or separately when wages are paid by personal check or cash, an accurate itemized statement in writing showing (1) gross wages earned, (2) total hours worked by the employee, except for any employee whose compensation is solely based on a salary and who is exempt from payment of overtime under subdivision (a) of Section 515 or any applicable order of the Industrial Welfare Commission, (3) the number of piece-rate units earned and any applicable piece rate if the employee is paid on a piece-rate basis, (4) all deductions, provided that all deductions made on written orders of the employee may be aggregated and shown as one item, (5) net wages earned, (6) the inclusive dates of the period for which the employee is paid, (7) the name of the employee and his or her social security number, (8) the name and address of the legal entity that is the employer, and (9) all applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee.

64. Labor Code § 226(e)(1) provides:

> An employee suffering injury as a result of a knowing and intentional failure by an employer to comply with subdivision (a) is entitled to recover the greater of all actual damages or fifty dollars ($50) for the initial pay period in which a violation occurs and one hundred dollars ($100) per employee for each violation in a subsequent pay period, not to exceed an aggregate penalty of four thousand dollars ($4,000), and is entitled to an award of costs and reasonable attorney's fees.

65. Labor Code § 226.3 provides:

> Any employer who violates subdivision (a) of Section 226 shall be subject to a civil penalty in the amount of two hundred fifty dollars ($250) per employee per violation in an initial citation and one thousand dollars ($1,000) per employee for each violation in a subsequent citation, for which the employer fails to provide the employee a wage deduction statement or fails to keep the records required in subdivision (a) of Section 226. The civil penalties provided for in this section are in addition to any other penalty provided by law. In enforcing this section, the Labor Commissioner shall take into consideration whether the violation was inadvertent, and in his or her discretion, may decide not to penalize an employer for a first violation when that

violation was due to a clerical error or inadvertent mistake.

66. Labor Code § 558(a) and (c) provide:

> (a) Any employer [] who violates, or causes to be violated, a section of this chapter or any provisions regulating hours and days of work in any order of the Industrial Welfare Commission shall be subject to a civil penalty as follows: (1) For any initial violation, fifty dollars ($50) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages. (2) For each subsequent violation, one hundred dollars ($100) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages…. (c) The civil penalties provided for in this section are in addition to any other civil or criminal penalty provided by law.

Labor Code § 1174(d) requires every person employing labor in California to, among other things:

> Keep at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments.

67. Labor Code § 1174.5 subjects any person who willfully fails to maintain records required by Labor Code § 1174 to a civil penalty of $500.

68. Dolgovin, and the Aggrieved Employees, seeks civil penalties pursuant to Lab. Code § 2699(a) for each failure by PIC Capital, as alleged in this Complaint, to timely pay all wages owed upon separation of employment in compliance with Lab. Code §§ 201–204, in the amounts established by Lab. Code § 203.

69. Dolgovin, and the Aggrieved Employees, seeks such penalties as an alternative to the penalties available to individual litigants under Lab. Code § 203, where applicable, as prayed for herein.

70. Dolgovin, and the Aggrieved Employees, also seeks civil penalties pursuant to Lab. Code § 2699(a) for each failure by PIC Capital, as alleged in this Complaint, to provide accurate, itemized wage statements in compliance with Lab. Code § 226(a), in the amounts established by Lab. Code § 226(e).

71.

72. Dolgovin, and the Aggrieved Employees, further seeks civil penalties in the amounts described under Lab. Code § 558, pursuant to Lab. Code § 2699(a), for each pay period in which PIC Capital, as alleged in this Complaint, failed to pay all overtime wages owed in violation of Lab. Code §§ 510, 1194 and IWC Wage Order No. 4-2001.

73. Dolgovin, and the Aggrieved Employees, additionally seeks civil penalties pursuant to Lab. Code § 2699(a) for each pay period in which PIC Capital failed to pay minimum wages for all hours worked, in violation of Lab. Code § 1194 and the applicable IWC Wage Order.

74. Pursuant to Lab. Code § 2699.3(a)(1)–(2), Dolgovin, and the Aggrieved Employees, provided the California Labor and Workforce Development Agency ("LWDA") with written notice of the intention to file this claim on December 16, 2025.

75. More than sixty-five (65) calendar days have elapsed without notice from the LWDA of its intent to investigate.

76. Accordingly, Dolgovin, and the Aggrieved Employees, has satisfied all administrative prerequisites to commence this civil action in compliance with Lab. Code § 2699.3(a).

77. Dolgovin, and the Aggrieved Employees, seeks the foregoing civil penalties on behalf of the State of California and the Aggrieved Employees as outlined in Lab. Code § 2699.

78. PIC Capital is liable to the State of California and the Aggrieved Employees for the civil penalties alleged herein, together with interest thereon.

79. Dolgovin, and the Aggrieved Employees, is also entitled to an award of attorneys' fees and costs as provided by law.

80. Wherefore, Dolgovin and the Aggrieved Employees request relief as hereinafter set forth.

Count II

Penalties Pursuant to Labor Code § 2699(f)

81. Dolgovin incorporates all other paragraphs by reference.

82. Labor Code § 2699(f) provides:

> For all provisions of this code except those for which a civil penalty is specifically provided, there is established a civil penalty for a violation of these provisions, as follows: … (2) If, at the time of the alleged violation, the person employs one or more employees, the civil penalty is one hundred dollars ($100) for each aggrieved employee per pay period for the initial violation and two hundred dollars ($200) for each aggrieved employee per pay period for each subsequent violation.

83. Labor Code § 200 defines wages as "all amounts for labor performed by employees of every description, whether the amount is fixed or ascertained by the standard of time, task, piece, commission basis, or other method of calculation." All such wages are subject to California's overtime and double time requirements, including those set forth above.

84. Labor Code § 204(a) provides that "[a]ll wages . . . earned by any person in any employment are due and payable twice during each calendar month[.]"

85. Labor Code § 510(a) provides as follows:

> Eight hours of labor constitutes a day's work. Any work in excess of eight hours in one workday and any work in excess of 40 hours in any one workweek and the first eight hours worked on the seventh day of work in any one workweek shall be compensated at the rate of no less than one and one-half times the regular rate of pay for an employee. Any work in excess of 12 hours in one day shall be compensated at the rate of no less than twice the regular rate of pay for an employee.

86. IWC Wage Order 4-2001(3)(A)(1) states that employees:

> …shall not be employed more than eight (8) hours in any workday or more than 40 hours in any workweek unless the employee receives one and one-half (1 ½) times such employee's regular rate of pay for all hours worked over 40 hours in the workweek. Employment beyond eight (8) hours in any workday or more than six (6) days in any workweek is permissible provided the employee is compensated for such overtime at not less than … [o]ne and one-half (1½) times the employee's regular rate of pay for all hours worked in excess of eight (8) hours up to and including 12 hours in any workday, and for the first eight (8) hours worked on the seventh (7th) consecutive day of work in a workweek….

87. Labor Code § 1194(a) provides as follows:

> Notwithstanding any agreement to work for a lesser wage, any employee receiving less than the legal minimum wage or the legal overtime compensation applicable to the employee is entitled to recover in a civil action the unpaid balance of the full amount of this minimum wage or overtime compensation, including interest thereon, reasonable attorneys' fees, and costs of suit.

88. Labor Code § 1198 makes it unlawful for employers to employ employees under conditions that violate relevant Wage Order(s).

89. To the extent that any violation alleged herein does not carry civil penalties under Lab. Code § 2699(a) or another statute providing an express civil penalty, Dolgovin, and the Aggrieved Employees, seeks civil penalties pursuant to Lab. Code § 2699(f) for the Aggrieved Employees for each pay period in which such employee was aggrieved, in the amounts established by Lab. Code § 2699(f).

90. Dolgovin, and the Aggrieved Employees, seeks civil penalties under Lab. Code § 2699(f) for any violations committed by PIC Capital that do not independently provide for civil penalties under the California Labor Code or applicable IWC Wage Orders.

91. Pursuant to Lab. Code § 2699.3(a)(1)–(2), Dolgovin, and the Aggrieved Employees, provided the California Labor and Workforce Development Agency ("LWDA") with written notice of the intention to file this claim.

92. More than sixty-five (65) calendar days have elapsed without notice from the LWDA of its intent to investigate. Accordingly, Dolgovin, and the Aggrieved Employees, has satisfied all administrative prerequisites to commence this civil action.

93. Dolgovin, and the Aggrieved Employees, seeks the foregoing civil penalties on behalf of the State of California and the Aggrieved Employees as outlined in Lab. Code § 2699.

94. Lab. Code § 2699(f)(2) provides a civil penalty of one hundred dollars ($100) for each aggrieved employee per pay period for the initial violation of a Labor Code provision that does not provide for a civil penalty if, at the time of the violation, the employer employs one or more employees. Lab. Code § 2699(f)(2) further provides a civil penalty of two hundred dollars ($200) for each aggrieved employee per pay period for each subsequent violation of a Labor Code provision that does not provide for a civil penalty if, at the time of the violation, the employer

employs one or more employees.

95. PIC Capital is liable to the State of California and the Aggrieved Employees for the civil penalties alleged herein, together with interest thereon.

96. Dolgovin, and the Aggrieved Employees, is also entitled to an award of attorneys' fees and costs as provided by law.

97. Wherefore, Dolgovin, and the Aggrieved Employees, requests relief as hereinafter set forth.

Relief Requested

WHEREFORE, Dolgovin, on behalf of the State of California and the Aggrieved Employees, requests the following relief:

a. A declaratory judgment that Defendants' conduct violated the Labor Code as alleged herein;

b. An order awarding civil penalties against Defendants to the fullest extent provided for by PAGA;

c. An award of attorneys' fees, costs, and expenses as provided by the California Labor Code, including Labor Code § 2699(g)(1); California Code of Civil Procedure §1021.5; and/or any other applicable law;

d. Pre- and post-judgment interest on any amounts awarded at the highest applicable rate allowed by law; and

e. Such other and further relief as this Court deems just and proper.

Dated: April 9, 2026

Laurel Employment Law APC

Joshua I. White, Esq.
Kyle R. DeCamp, Esq.

Attorneys for Dolgovin, on Behalf of the State of California and Aggrieved Employees