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December 15, 2025

Via Online Filing (LWDA) AND Certified Mail

California Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act>

Certified Mail (Employers)

Torque Parts LLC
c/o Agent for Service of Process:
Northwest Registered Agent, Inc.
2108 N Street, Ste. N
Sacramento, CA 95816

Torque Parts LLC
380 Roma Jean Parkway
Streamwood, IL 60107

Torque Parts LLC
4422 E Airport Dr # A
Ontario, CA 91761

**Re: NOTICE PURSUANT TO LABOR CODE SECTIONS 2699 *et seq.*
Aggrieved Employees: Warehouse Employees**

To Whom It May Concern:

PLEASE TAKE NOTICE that Plaintiffs **Gabriel Arias and Alberto Arias** ("Plaintiffs"), on behalf of themselves and all other current and former aggrieved employees, hereby provide written notice of their intent to seek civil penalties pursuant to the Private Attorneys General Act ("PAGA"), Labor Code §§ 2698 *et seq.*, against **Torque Parts LLC** ("Employer").

Plaintiffs were employed by Employer as non-exempt warehouse employees at Employer's Ontario, California facility. During the PAGA period, Employer committed multiple violations of the California Labor Code and applicable Industrial Welfare Commission Wage Orders, including but not limited to the following:

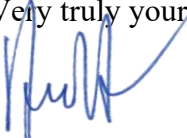
1. Failure to Pay All Wages / Overtime (Lab. Code §§ 510, 1194, 1197, 1198; Wage Order 7-2001)
Employer failed to pay aggrieved employees for all hours worked, including off-the-clock work and work performed during unpaid or late meal periods. As a result, overtime wages owed for work in excess of eight (8) hours per day and forty (40) hours per week were not paid.
2. Meal Period Violations (Lab. Code §§ 226.7, 512; Wage Order 7-2001)
Employer failed to provide timely, duty-free meal periods by the end of the fifth hour of work and failed to pay meal period premium wages.
3. Rest Period Violations (Lab. Code § 226.7; Wage Order 7-2001)
Employer failed to authorize and permit compliant rest periods and failed to pay rest period premium wages.
4. Failure to Timely Pay Wages During Employment and at Separation (Lab. Code §§ 201–204, 210)
Employer failed to timely pay all earned wages during employment and failed to timely pay all wages due upon separation, resulting in waiting-time penalties.
5. Failure to Provide Accurate Itemized Wage Statements (Lab. Code § 226)
Employer failed to provide accurate itemized wage statements reflecting all hours worked and wages earned.
6. Failure to Reimburse Business Expenses (Lab. Code § 2802)
Employer required aggrieved employees to use personal cell phones for work-related communications and to maintain employer-mandated work attire without reimbursement.
7. Failure to Provide Suitable Seating (Lab. Code § 1198; Wage Order 7-2001)
Employer failed to provide suitable seating to warehouse employees even though the nature of the work reasonably permitted sitting for certain tasks. Employees were required to stand throughout the workday, while seating was provided only for management.

The facts supporting these violations are based on Plaintiffs' personal knowledge and experience and apply to all aggrieved employees during the PAGA period.

Pursuant to Labor Code § 2699.3(a), Plaintiffs request that the LWDA advise within sixty (60) days whether it intends to investigate these alleged violations. If the LWDA declines to investigate or does not respond within the statutory period, Plaintiffs intend to pursue civil penalties in court as authorized by PAGA.

If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,



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Email: md@fclawfirm.net
Enclosures: Complaint