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VIA CERTIFIED U.S. MAIL & RETURN RECEIPT REQUESTED
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Department of Industrial Relations
California Labor & Workforce Development Agency
[Notice Filed Online via LWDA/PAGA Filing Portal]

Wal-Mart Associates, Inc.
c/o CT Corporation System
330 N. Brand Blvd., Ste. 700
Glendale, CA 91203

Re: *Tess Chrisman v. Wal-Mart Associates, Inc.*
PRIVATE ATTORNEY GENERAL ACT ("PAGA") NOTICE

Greetings:

My firm has been retained by Tess Chrisman ("Ms. Chrisman") concerning her retaliation and wrongful termination action against Wal-Mart Associates, Inc. ("Walmart"). I am writing this letter to the Labor & Workforce Development Agency ("LWDA") to exhaust her administrative remedies pursuant to *Labor Code* §§ 2699 *et seq.* and 2699.3.

Walmart operates a warehouse distribution center in Chino, California. Walmart hired Ms. Chrisman in April of 2016, as a "picker" of merchandise at one of Walmart's distribution warehouses. Throughout the course of her employment, Walmart has promoted Ms. Chrisman from her original position of picker to forklift driver, supervisor, and lastly as an auditor. As an auditor, Ms. Chrisman oversaw quality control for merchandise to be shipped outside of the distribution center.

Throughout 2025, Ms. Chrisman complained to Walmart about unlawful risks to her own health and safety in the workplace, including that she was a victim of domestic violence and stalking, both of which were committed by another Walmart employee who worked at the same location. Ms. Chrisman complained that these unsafe working conditions created a substantial risk of harm to herself. Additionally, on June 20, 2025, Ms. Chrisman filed a PAGA letter with the Department of Industrial Relations for various California wage and hour violations and initiated a class action on behalf of herself and other similarly situated Walmart employees against Walmart for said wage and hour violations. On or about September 10, 2025, Walmart retaliated against and wrongfully terminated Ms. Chrisman in direct response to her protected complaints regarding unsafe and unlawful working conditions, including criminal conduct in the workplace, as well as her

engagement in protected activities by reporting Walmart's wage and hour violations to the Department of Industrial Relations and filing a prior PAGA notice and wage and hour action.

As a result, Ms. Chrisman alleges that Walmart, as her employer, retaliated against and wrongfully terminated her on September 10, 2025, in violation of the following provisions of the California Labor Code:

- **Labor Code § 98.6**

Walmart terminated Ms. Chrisman after she filed a prior PAGA notice and initiated a wage and hour lawsuit, thereby retaliating against her for exercising rights protected under the Labor Code.

- **Labor Code § 232.5**

Walmart retaliated against Ms. Chrisman for reporting violations of law to her employer and to government agencies, in violation of Labor Code § 232.5.

- **Labor Code § 1102.5**

Walmart terminated Ms. Chrisman after she reported unsafe working conditions, criminal conduct by a coworker, and other unlawful workplace practices, thereby retaliating against her for engaging in protected whistleblowing activity.

- **Labor Code § 6310**

Walmart terminated Ms. Chrisman after she complained about unsafe working conditions that placed her at risk of physical injury, thereby retaliating against her for engaging in protected workplace safety activity.

As a result of these circumstances, Ms. Chrisman is preparing to file a civil lawsuit with the Los Angeles Superior Court asserting civil claims including those for retaliation and wrongful termination as set forth by *Labor Code* §§ 98.6, 232.5, 1102.5 & 6310, among other claims. The purpose of this letter is to learn whether the LWDA intends to investigate Ms. Chrisman's allegations regarding Walmart's violations of *Labor Code* §§ 98.6, 232.5, 1102.5, & 6310, and the potential civil penalties specified by *Labor Code* §§ 98.6(b)(3), 1102.5(f), 6310, and 2699 *et seq.*

Submitted concurrently with this letter is the required filing fee of \$75.00, per the PAGA requirements. Thank you for your assistance and cooperation in this matter. Should you have any questions, please contact me at (213) 382-2222.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melad N. Haddad', with a stylized, cursive script.

Melad N. Haddad, Esq.
EMPLOYEE JUSTICE LEGAL GROUP, P.C.