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February 20, 2026

Via Electronic Submission and Certified Mail

Labor & Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
Via Electronic Submission: https://dir.govfa.net/411

Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814
Via Certified Mailing No.: 9414836208551295500609

Dollar Tree Stores, Inc.
500 Volvo Parkway
Chesapeake, Virginia 23320
Via Certified Mailing No.: 9414836208551295500715

Dollar Tree Stores, Inc.
c/o Agent for Service of Process
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, California 95833
Via Certified Mailing No.: 9414836208551295500760

Re: Victoria Heppner v. Dollar Tree Stores, Inc.
Notice of Labor Code Violations Pursuant to the Private Attorneys General Act

Dear Sir or Madam:

Please take notice that Arias Sanguinetti Wang & Team LLP represents Victoria Heppner ("Employee"), a former Store Manager employed by Dollar Tree Stores, Inc. ("Dollar Tree" or "Employer") in California. Pursuant to the California Private Attorneys General Act of 2004 ("PAGA"), Labor Code sections 2698 through 2699.5, Employee submits this notice on behalf of herself and all other similarly situated current and former employees employed by Dollar Tree in California who are aggrieved by the unlawful practices described below.

This notice is based upon Employee's personal knowledge, counsel's investigation, and information obtained from other employees performing substantially similar work throughout Dollar Tree's California operations. The violations described herein arise from centralized and uniform corporate policies governing staffing levels, labor budgeting, payroll allotments, employee classification, compensation practices, operational reporting requirements, and timekeeping practices implemented on a statewide basis. As a direct and foreseeable result of these uniform policies, employees across Dollar Tree's California stores were systematically deprived of lawful wages, compliant meal and rest periods, accurate wage statements, reimbursement of business expenses, and other statutory protections required by the California Labor Code and Industrial Welfare Commission Wage Order No. 7-2001 governing the mercantile industry. Dollar Tree operates approximately 809 retail stores in California, representing approximately nine percent of its nationwide store count.

I. BACKGROUND REGARDING AGGRIEVED EMPLOYEE

Employee was hired as a salaried Store Manager in July 2024 and worked at Dollar Tree's Junction Store located in Sonora, California (formerly a 99 Cents Only store at 740 Mono Way) until going on medical leave in February 2025. Employee's annual salary was $68,980. Employee regularly worked well in excess of forty hours per week, commonly working between fifty-two and seventy-one hours weekly and frequently working six consecutive days. During the holiday period from November 1 through December 24, Employee was subject to mandatory six-day, ten-hour-per-day scheduling requirements, resulting in a minimum of sixty hours per week. On at least five to six separate weeks during her tenure, Employee worked seventy to seventy-one hours. On at least one occasion, Employee worked sixteen hours in a single day. Employee estimates she worked approximately 3,265 total hours during her tenure from July 12, 2024 through February 26, 2025.

Despite her managerial title, the overwhelming majority of Employee's time was spent performing non-exempt manual labor, including cashiering, stocking shelves, unloading freight, cleaning, covering staffing shortages, and performing duties identical to those performed by hourly employees. Employee personally checked out approximately 200 to 250 customers per week on the register, representing approximately ten percent of all cashiering at her store. On Sundays, Employee regularly worked alone as the only manager on duty from approximately 8:30 a.m. to 9:00 p.m. with only one cashier present. On Mondays, Employee was routinely the only manager until approximately 3:00 p.m., during which time she was unable to leave the store or relinquish supervisory control for any purpose.

Managerial authority was limited: hiring, discipline, and termination decisions required approval from district management or human resources, and labor hours were strictly controlled through centralized payroll allocations set by District Manager Rebecca Chavez that routinely left stores understaffed. Employee repeatedly requested additional payroll hours and was denied. Her store was open approximately 97 hours per week, with a store payroll allotment ranging from 190 to 256 hours per week, not including Employee's own hours. Employee was also inadequately trained, receiving approximately one week of mostly video-based training instead of the four to five weeks promised.

II. AGGRIEVED EMPLOYEES

The aggrieved employees on whose behalf this notice is submitted include, without limitation, all current and former Store Managers classified as exempt employees, all hourly Assistant Managers, and all other non-exempt employees employed by Dollar Tree in California who were subject to the uniform policies and practices described herein. This notice expressly encompasses both the misclassification of salaried Store Managers and the off-the-clock work and wage violations suffered by hourly employees, including Assistant Managers who were prohibited from recording overtime and were required to work through meal periods to avoid triggering payroll penalties. These unlawful practices were implemented through standardized corporate directives and affected employees performing substantially similar duties throughout Dollar Tree's California locations.

III. LABOR CODE VIOLATIONS

A. Misclassification of Store Managers as Exempt Employees (Labor Code §§ 510, 515, 1194, 1197, 1182.12; IWC Wage Order No. 7-2001)

Dollar Tree misclassified Employee and similarly situated Store Managers as exempt employees under the executive exemption in violation of California law. To qualify for the executive exemption, an employee must primarily engage in managerial duties, customarily exercise discretion and independent judgment, and possess meaningful authority regarding employment decisions.

Employee did not primarily perform exempt managerial duties. The majority of her working time was devoted to non-exempt tasks identical to those performed by hourly employees, including cashiering, freight unloading, stocking, and cleaning. Managerial discretion was constrained by corporate labor budgets, and staffing and disciplinary decisions required district management approval. Because Employee and similarly situated employees did not primarily perform exempt duties and lacked meaningful independent discretion, they were not lawfully exempt from overtime and minimum wage protections. Dollar Tree's failure to properly classify these employees resulted in violations of Labor Code sections 510, 1194, 1197, and 1182.12. The misclassification of Store Managers was not the result of individualized assessments but instead flowed directly from Dollar Tree's uniform corporate staffing model and labor allocation policies applied statewide.

B. Off-the-Clock Work and Unpaid Wages
(Labor Code §§ 200, 204, 221, 510, 1194; IWC Wage Order No. 7-2001)

Dollar Tree's staffing and payroll practices caused both exempt-classified Store Managers and hourly employees to perform work off the clock. Employees were expected to complete operational duties despite strict payroll hour limitations and were discouraged from recording all time worked. Work was routinely performed before and after scheduled shifts and during unpaid periods, resulting in unlawful withholding of earned wages.

Hourly Assistant Managers were prohibited from incurring overtime and were disciplined when payroll hours exceeded allotted limits, causing employees to work through meal and rest periods without compensation. The payroll hour restrictions were so severe that even five minutes of overtime would result in discipline. These off-the-clock practices were a predictable and unavoidable consequence of Dollar Tree's centralized payroll controls and therefore affected employees throughout California stores operating under identical labor budgets.

C. Unlawful Timekeeping Practices and Failure to Pay for All Hours Worked
(Labor Code §§ 204, 1194, 1197; IWC Wage Order No. 7-2001, § 7)

Dollar Tree maintained timekeeping systems that failed to capture all compensable work time. Hourly employees clocked in and out on in-store registers. The process of opening the store required employees to perform compensable work activities — including entering the store and disabling alarm systems — before they could reach the register to clock in. This systematic gap between the commencement of work and the recording of time resulted in regular underpayment of wages. Under California law, the "de minimis" doctrine does not apply to bar recovery for such uncompensated time. (Donohue v. AMN Services, LLC (2021) 11 Cal.5th 58.) Dollar Tree failed to ensure accurate recording of hours worked despite knowing employees routinely worked beyond scheduled hours.

D. Failure to Provide Lawful Meal Periods
(Labor Code §§ 226.7, 512; IWC Wage Order No. 7-2001, § 11)

Dollar Tree failed to provide Employee and similarly situated employees with lawful, uninterrupted off-duty meal periods as required by Labor Code sections 226.7 and 512 and Wage Order No. 7-2001. Because stores frequently operated with only one manager present and chronically insufficient staffing levels, Employee was unable to take compliant thirty-minute off-duty meal periods within the first five hours of work. On Sundays, Employee regularly worked alone as the only manager from approximately 8:30 a.m. to 9:00 p.m.; on Mondays, she was the sole manager until approximately 3:00 p.m. In these and similar circumstances, Employee was unable to leave the store premises or relinquish all duties. Meal periods were commonly late, interrupted, on-duty, or entirely missed, and Dollar Tree failed to provide the one-hour premium pay required by Labor Code section 226.7.

This same pattern extended to hourly Assistant Managers who were required to work through meal periods to avoid recording overtime under Dollar Tree's strict payroll allotment controls. The inability to take compliant meal periods was a direct result of Dollar Tree's uniform staffing model applied statewide.

E. Failure to Provide Lawful Rest Periods
(Labor Code § 226.7; IWC Wage Order No. 7-2001, § 12)

Dollar Tree failed to authorize and permit compliant ten-minute off-duty rest periods as required by Labor Code section 226.7 and Wage Order No. 7-2001, section 12. Because Employee was frequently the sole manager on duty, uninterrupted rest breaks were impracticable. Dollar Tree knew or should have known its staffing practices made compliant rest periods impossible, yet failed to implement adequate policies ensuring lawful break authorization. Dollar Tree failed to provide the required one-hour premium pay for each missed rest period. These failures applied equally to hourly employees who, under Dollar Tree's payroll restrictions, were effectively required to forgo breaks to meet operational demands.

F. Additional Wage Order Violations: Reporting Time Pay, Split Shift Premiums, and Suitable Seating

(IWC Wage Order No. 7-2001, §§ 4, 5, 14; Labor Code § 1198)

Dollar Tree's scheduling and operational practices resulted in additional violations of Wage Order No. 7-2001. First, to the extent employees reported to work as scheduled but were furnished with fewer than half their scheduled hours due to payroll allotment restrictions, Dollar Tree failed to provide required reporting time pay under Wage Order No. 7-2001, section 5. Second, to the extent Dollar Tree's scheduling practices created unpaid work interruptions exceeding one hour that do not qualify as bona fide meal periods, Dollar Tree failed to pay split-shift premiums as required by Wage Order No. 7-2001, section 4(C). Third, Dollar Tree failed to provide suitable seating for employees performing cashiering and similar duties where the nature of the work reasonably permits seated performance, in violation of Wage Order No. 7-2001, section 14. These practices constitute employment under unlawful conditions in violation of Labor Code section 1198.

G. Failure to Timely Pay All Wages Due
(Labor Code §§ 201–204, 203, 210)

Dollar Tree's failure to pay all wages owed — including overtime wages, minimum wages, and premium pay — resulted in violations of Labor Code sections 201 through 204 and 210 governing the timely payment of wages during employment. Dollar Tree failed to pay all earned wages on each regular payday as required. To the extent that any aggrieved employees have separated or are separated from employment during the pendency of this matter, Dollar Tree's failure to pay all earned wages immediately upon discharge or within seventy-two hours of resignation triggers waiting time penalties under Labor Code section 203.

H. Inaccurate Wage Statements
(Labor Code § 226(a))

Dollar Tree issued inaccurate and noncompliant wage statements that failed to accurately reflect total hours worked, overtime compensation, applicable rates of pay, and premium wages owed for missed meal and rest periods, preventing employees from determining whether they had been properly compensated and causing actual injury as contemplated by Labor Code section 226(e).

I. Failure to Reimburse Business Expenses
(Labor Code § 2802)

Dollar Tree required Employee and similarly situated employees, including hourly Assistant Managers, to use their personal cellular telephones for mandatory and extensive business purposes without reimbursement. Employee was required to submit hundreds of photographs each week pursuant to a mandatory weekly photography schedule directed by her District Manager: impulse and "red zone" areas on Mondays; Multi-Price sections and Dollar Tree Plus aisles on Tuesdays; backroom conditions before and after truck deliveries, and cashier productivity reports on Wednesdays; party aisles and end cap displays on Thursdays; and freezer sections on Sundays, Wednesdays, and Fridays. Employee was also required to use her personal cell phone for theft documentation, accident reporting, communications with district management via personal and group text messages, scheduling coordination, and incident reporting throughout each week. These obligations generated substantial and ongoing data usage, call volume, and wear on Employee's personal device. Dollar Tree provided no reimbursement for these expenses, thereby unlawfully shifting the cost of conducting business onto its employees in violation of Labor Code section 2802.

J. Failure to Maintain Accurate Payroll Records (Labor Code §§ 1174, 1174.5)

Dollar Tree failed to maintain accurate payroll records because off-the-clock work practices and misclassification of Store Managers prevented accurate recording of all hours worked and wages owed, in violation of Labor Code sections 1174 and 1174.5.

K. Employment Under Unlawful Conditions; Statutory Penalties (Labor Code §§ 558, 558.1, 1197.1, 1198, 1199)

The violations described herein resulted from centralized corporate policies applied uniformly throughout Dollar Tree's California operations and subject Dollar Tree to statutory penalties under Labor Code sections 558, 558.1, 1197.1, 1198, and 1199.

Employee and counsel continue to investigate these practices and have reason to believe that the violations described herein are ongoing and widespread throughout Dollar Tree's California operations. This notice is intended to afford Dollar Tree and the Labor and Workforce Development Agency a meaningful opportunity to evaluate and address these systemic violations before the initiation of representative enforcement litigation seeking civil penalties on behalf of the State of California.

IV. PENALTIES SOUGHT

Employee seeks recovery of all applicable civil penalties under PAGA for each violation described herein, including penalties authorized by Labor Code section 2699(f), together with attorneys' fees and costs pursuant to Labor Code section 2699(g), for each aggrieved employee and each pay period in which violations occurred.

V. PURPOSE OF NOTICE

This letter provides notice pursuant to Labor Code section 2699.3 of the specific statutory provisions alleged to have been violated and the factual bases supporting those violations. Unless the Labor and Workforce Development Agency elects to investigate, Employee intends to pursue a representative civil action to recover civil penalties on behalf of the State of California and all aggrieved employees.

Very truly yours,

ARIAS SANGUINETTI

Craig S. Momita

Craig S. Momita

Attorneys for Aggrieved Employee
Victoria Heppner