

February 2, 2026

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Agent for Service of Process for Luna Janitorial Services Inc.:
FFC Inc
1950 Paramount Blvd, Ste 203
Downey, CA 90242

Re: Raul Montano v. Luna Janitorial Services Inc.

Dear Labor and Workforce Development Agency and Luna Janitorial Services Inc.:

This letter shall serve as Raul Montano's ("Plaintiff") written notice as required by California Labor Code 2699.3(a)(1) of the specific provisions of the Labor Code allegedly violated by Luna Janitorial Services Inc. ("Defendant"), including the facts and theories to support the alleged violations. Plaintiff intends to seek civil penalties against Defendant under the Private Attorneys General Act of 2004 ("PAGA") on his own behalf and on behalf of all other individuals engaged to work for Defendants or currently or formerly employed by Defendant in California during the statutory period ("Aggrieved Employees"). Plaintiff is informed and believes and based thereon alleges that there are at least 50 Aggrieved Employees in the statutory period.

Labor Code Provisions Alleged to Have Been Violated

Plaintiff alleges Defendant violated the following Labor Code provisions: Labor Code §§ 201, 202, 203, 204, 210, 226, 226.3, 226.7, 226.8, 510, 512, 558, 1174, 1174.5, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198.

Facts and Theories Supporting Each Alleged Violation

Plaintiff was employed by Defendant in Desert Hot Springs, California as a non-exempt cleaner from approximately October 2024 to approximately October 2025.

Willful Misclassification

Throughout the statutory period, Defendant willfully misclassified Plaintiff and other Aggrieved Employees as independent contractors in violation of Labor Code § 226.8.

Minimum and Overtime Wages

Throughout the statutory period, Defendant failed to pay Plaintiff and other Aggrieved Employees at least the legal minimum wage and overtime wage for all hours worked due to Defendant's policy and practice of failing to keep records of the time Plaintiff and other Aggrieved Employees worked with a system for clocking in and out. Instead, Defendant paid Plaintiff and other Aggrieved Employees based on hours scheduled to work. As a result, Defendant failed to pay Plaintiff and other Aggrieved Employees for all minimum and overtime wages due in violation of Labor Code §§ 510, 558, 1182.12, 1194, 1194.2, 1197, 1197.1, and 1198.

Meal Periods

Throughout the statutory period, Defendant failed to provide Plaintiff and other Aggrieved Employees with 30-minute meal periods for every 5 hours worked as required by Labor Code § 512. Plaintiff 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. Defendant failed to pay Plaintiff 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, Defendant 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, Defendant failed to authorize and permit Plaintiff and other Aggrieved Employees to take 10-minute rest periods for every 4 hours worked or major fraction thereof. Plaintiff 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. Defendant failed to pay Plaintiff 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, Defendant failed to permit rest periods and pay rest period premiums in violation of Labor Code § 226.7.

Wage Statements

Due to Defendant's wage, meal period, and rest period violations as alleged above, Defendant failed to provide Plaintiff 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 and 226.3. In fact, Defendant failed to provide Plaintiff and other Aggrieved Employees with wage statements at all. These failures were knowing and intentional.

Timing of Wage Payments

Due to Defendant's wage, meal period, and rest period violations as alleged above, Defendant failed to pay all wages due during Plaintiff'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 Defendant's wage, meal period, and rest period violations as alleged above, Defendant failed to maintain accurate and complete records showing the hours worked each day by Plaintiff and other Aggrieved Employees in violation of Labor Code §§ 1174 and 1174.5.

Based on these violations, Plaintiff seeks civil penalties, injunctive relief, and attorneys' fees and costs under PAGA. Enclosed and incorporated herein is the class action complaint Plaintiff will be filing on behalf of himself and all other Aggrieved Employees against Defendant. Plaintiff 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 circular background.

Fawn F. Bekam

Enclosure: Class Action Complaint