

March 25, 2026

**ELECTRONICALLY FILED**

Attn: PAGA Administrator  
Labor and Workforce Development  
Agency 1515 Clay Street, Suite 801  
Oakland, California 94612  
Email: PAGAfilings@dir.ca.gov

**Re:**                               **Private Attorneys General Act of 2004 Notice**

**Employee:**                       **Conrad Toranski**

**Employers:**                   **Sprouts Farmers Market, LLC; Sprouts Farmers Market SFN**

Dear PAGA Administrator:

Pursuant to Cal. Lab. Code § 2699.3(a), Conrad Toranski (“Mr. Toranski” or “Plaintiff”) hereby notifies the California Labor & Workforce Development Agency (“LWDA”) that he intends to seek civil penalties and injunctive relief pursuant to Cal. Lab. Code §§ 2699(a), (e), (f), and (k) against Sprouts Farmers Market, LLC and Sprouts Farmers Market SFN (“Employers” or “Sprouts”), and any unknown related entities involved in the violations alleged, for its violations of the California Labor Code and applicable Industrial Welfare Commission (“IWC”) Wage Order(s), including, but not limited to:

- Cal. Lab. Code §§ 226, 1198.5, 432.5 (failure to produce personnel and payroll records).

**Background of Defendant:**

Sprouts operate an American supermarket chain that maintain stores across California and the United States, specializing in natural, organic, and gluten-free foods. Sprouts Farmers Market LLC is a California corporation and maintains its headquarters in Santa Ana, California. Sprouts Farmers Market LLC does business in the State of California. Sprouts Farmers Market SFN is headquartered in Phoenix, Arizona.

**Background of Plaintiff:**

Conrad Toranski worked for Sprouts as an Assistant Store Manager from approximately June 2022 until September 2024 at their locations in Los Angeles, California.

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**Failure to Produce Personnel File and Payroll Records:**

On October 2, 2025, pursuant to Cal. Lab. Code §§ 226, 1198.5, 432.5, Mr. Toranski sent Sprouts a written request for production of his personnel file and payroll records via certified mail. Sprouts did not respond to Mr. Toranski's written request, did not seek an extension of time to respond, and failed to produce the requisite records within the respective 30-day and 21-day time limits.

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Mr. Toranski is represented by Schneider Wallace Cottrell Kim LLP ("SWCK"), a law firm based in Emeryville, California. SWCK has extensive experience in the successful litigation and resolution of employment and representative actions nationwide. A description of the work, mission, and credentials of the firm can be found at [www.schneiderwallace.com](http://www.schneiderwallace.com). Mr. Toranski and SWCK are committed to zealously pursuing redress on behalf of the State of California and all other Aggrieved Employees for the violations set forth above.

Very Truly Yours,

**SCHNEIDER WALLACE  
COTTRELL KIM LLP**

Carolyn H. Cottrell  
Attorney at Law

*cc via U.S.P.S. Certified Mail with Return Receipt Requested:*

**Sprouts Farmers Market LLC**  
c/o Agent for Service of Process:  
Corporation Services Company  
2011 Palomar Airport Rd Ste 101  
Carlsbad, CA 92011

**Sprouts Farmers Market SFN**  
c/o Agent for Service of Process:  
Corporation Services Company  
2011 Palomar Airport Rd Ste 101  
Carlsbad, CA 92011