



STATE OF CALIFORNIA
Labor & Workforce Development Agency

GOVERNOR Gavin Newsom • SECRETARY Stewart Knox

Agricultural Labor Relations Board • California Unemployment Insurance Appeals Board
California Workforce Development Board • Department of Industrial Relations
Employment Development Department • Employment Training Panel • Public Employment Relations Board

May 28, 2026

Camron Dowlatshahi
Arash Sadat
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Via Email
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Notice Directing Submission of Amended PAGA Notices
(See Index Listing Cases)

Dear Messrs. Dowlatshahi and Sadat:

It has come to the attention of the Private Attorneys General Act (PAGA) Unit of the California Labor and Workforce Development Agency (LWDA) that you have filed numerous PAGA notices containing boilerplate claims on behalf of allegedly aggrieved employees against employers throughout the state. Based on a demonstrated pattern of conduct evidencing abuse of the prelitigation administrative processes administered by LWDA, you hereby are directed to file amended PAGA notices in each pending matter listed in the index included with this letter consistent with the instructions provided. Failure to correct this behavior moving forward may result in additional action against you and/or your firm.

I. Background

Your law firm has filed about 247 PAGA notices since July 1, 2025.¹ Although the PAGA Case Search Web page identifies several different individuals as the

¹ Most of the PAGA notices filed by your firm are submitted to LWDA via the online PAGA filing portal identifying your firm name as "Mills Sadat Dowlat LLP." (See <<https://cadir.my.salesforce-sites.com/PagaSearch/PAGASearchResults?ed=2026-05-27&sd=2025-07-01&ss=Mills+Sadat+Dowlat&st=PAGA+Notice>> [as of May 28, 2026].) However, many also are submitted identifying your firm name as "MSD Lawyers." (See <<https://cadir.my.salesforce-sites.com/PagaSearch/PAGASearchResults?ed=2026-05-27&sd=2025-07-01&ss=MSD+Lawyers&st=PAGA+Notice>> [as of May 28, 2026].)

“Filer/Attorney” submitting the PAGA notices, as of at least March 24, 2026, it appears most of the notices are signed by Mr. Dowlatshahi with the balance being signed by Mr. Sadat.²

The LWDA PAGA Unit has serious concerns regarding the PAGA notices you and your firm are filing—in particular, the boilerplate nature of the notices and the manner in which the violations they describe are alleged. The notices are identical in all respects except for (1) the name of the employee, (2) the name of the employer, and (3) the dates of the employee’s employment. All but three notices filed by your firm since at least March 24 use the same seven-page template alleging the same seven violations; the three exceptions are otherwise identical in all material respects but omit a single alleged violation for failure to timely pay wages at termination.³ The violations alleged in these notices consist of the same broad, conclusory language without any “facts and theories” unique to the circumstances of any particular claimant’s employment experiences. (Lab. Code, § 2699.3, subds. (a)(1)(A), (c)(1)(A).)⁴ These types of allegations, without further articulation concerning the circumstances of a particular claimant’s employment with their employer, frustrate the purposes and policies of the law, including the LWDA’s ability to assess the nature, scope, or seriousness—as well as the veracity—of the violations alleged.

II. PAGA’s Administrative Notice Requirements

Before an “aggrieved employee” may commence a civil action under PAGA, section 2699.3, subdivision (c)(1) requires the employee give written notice to the LWDA and employer “of the specific provisions of this code alleged to have been violated, including the facts and theories to support the alleged violation.”⁵ This prelitigation notice obligation has been described as an “administrative exhaustion” requirement (*Rojas-Cifuentes v. Superior Court* (2020) 58 Cal.App.5th 1051, 1056), and courts have affirmed that “[p]roper notice under section 2699.3 is a ‘condition’ of a PAGA lawsuit.” (*Uribe v. Crown Bldg. Maint. Co.* (2021) 70 Cal.App.5th 986, 1003.)

² For example, it appears all of the PAGA notices filed and identifying your firm name as “MSD Lawyers” were filed by Maria Lawhon. Other notices that are filed using the entire firm name have been submitted by several individuals, including Julio Anleu, Isabella Fiorentino, and Chloe Jorgensen, as well as Maria Lawhon. None of these individuals are identified as attorneys on your firm’s Web site. (See <<https://msdlawyers.com/attorneys/>> [as of May 28, 2026].)

³ However, it is noted a number of the notices using the seven-page template state the employee remains employed with the employer while also alleging a violation for failure to pay wages at termination. (Cf. Lab. Code, § 2699, subd. (c)(1).)

⁴ Subsequent statutory citations are to the Labor Code unless otherwise indicated.

⁵ Subdivisions (a)(1)(A) and (b)(1) of section 2699.3 include virtually identical notice requirements for claims subject to those provisions.

Before the 2024 PAGA reforms (Stats. 2024, ch. 44 [Assem. Bill No. 2288 (2023-2024 Reg. Sess.)], ch. 45 [Sen. Bill No. 92 (2023-2-24 Reg. Sess.)]), the California Supreme Court found PAGA did not require a claimant to “satisfy a particular threshold of weightiness” in describing the facts and theories supporting the violations alleged in a notice. (*Williams v. Superior Court* (2017) 3 Cal.5th 531, 546.) In doing so, the court concluded a heightened proof requirement “would undercut the clear legislative purposes the act was designed to serve.” (*Ibid.*)

The 2024 amendments to PAGA evince a legislative intent to increase LWDA oversight of the law and provide more robust early resolution avenues for the benefit of both employees and employers, with an aim towards achieving more timely remedies to make employees whole without the type of protracted and costly litigation that has led to criticism of the Act. (Sen. Com. on Jud., analysis of Assem. Bill No. 2288 (2023-2024 Reg. Sess.) as amended June 21, 2024, p. 1 [noting the bill “increases the role of [LWDA] and better incorporates the available remedies, processes, and outcomes utilized or sought by [LWDA] in its enforcement efforts”]; Assem. Com. on Jud., analysis of Sen. Bill No. 92 (2023-2024 Reg. Sess.) as amended June 21, 2024, p. 12 [“At its core this bill addresses the business community’s objections that PAGA . . . denies businesses the right to cure violations and results in protracted and costly litigation”].) Two key components of the reforms are (1) the small employer prelitigation cure process administered by LWDA and (2) the early evaluation conference procedure available after a civil action has commenced, both of which are designed to facilitate more timely resolution of PAGA claims. (Assem. Com. on Jud., analysis of Sen. Bill No. 92 (2023-2024 Reg. Sess.) as amended June 21, 2024, p. 13 [“The underlying rationale for both this measure and AB 2288 appears to be a goal of resolving PAGA disputes in a timelier manner. The cure and early evaluation conference provisions of this bill are designed to promote resolution of PAGA claims without protracted litigation”].)

These early resolution opportunities are complemented by amendments to section 2699.5 expanding the types of claims subject to administrative cure or early evaluation procedures, including the most common types of wage and hour violations alleged in PAGA notices. Another aspect of the reforms relevant here is the limitation on employee standing; under section 2699, subdivision (c)(1) a claimant must have been employed by the employer “and personally suffered each of the violations alleged” within one year of the date the PAGA notice is filed. (Cf. *Huff v. Securitas Security Services USA, Inc.* (2018) 23 Cal.App.5th 745, 754.)

With these considerations in mind, a PAGA notice properly must inform both LWDA and the employer of the nature of the specific violations alleged with some level of detail in describing the “facts and theories” supporting them. The

boilerplate PAGA notices you and your firm are filing (*at a rate of more than one per business day*) generally fail to demonstrate any applicability or relevance to a particular claimant or their unique circumstances in terms of their employment with their current or former employer in any specific case. These carbon copy notices are demonstrably unreliable for purposes of discerning what violation(s), if any, a claimant in any case actually personally suffered. (See § 2699, subd. (c)(1).) While the pleading standard attendant to PAGA notices is not necessarily a “weighty” or burdensome one, the circumstances present here raise concerns whether these notices satisfy even a standard of “nonfrivolousness.” (*Williams, supra*, 3 Cal.5th at p. 545, citing Code Civ. Proc., § 128.7.)⁶

Courts previously have found a PAGA notice “must be specific enough such that the LWDA and the [employer] can glean the underlying factual basis for the alleged violations.” (*Ibarra v. Chuy & Sons Labor, Inc.* (2024) 102 Cal.App.5th 874, 882, quoting *Gunther v. Alaska Airlines, Inc.* (2021) 72 Cal.App.5th 334, 351.) Thus, “more than bare allegations of Labor Code violations” are required. (*Ibarra, supra*, 102 Cal.App.5th at p. 881; *Uribe, supra*, 70 Cal.App.5th at p. 1004.) The notice must contain sufficient information to allow LWDA “to intelligently assess the seriousness of the alleged violations.” (*Ibarra, supra*, 102 Cal.App.5th at p. 881, quoting *Brown v. Ralph’s Grocery Co.* (2018) 28 Cal.App.5th 824, 837; *Williams v. Alacrity Solutions Group, LLC* (2025) 110 Cal.App.5th 932, 941, review granted July 9, 2025, S291199.) These requirements take on even more importance after the 2024 reforms. (See *Williams, supra*, 110 Cal.App.5th at p. 944.) The effectiveness of the new cure and early evaluation procedures set forth in section 2699.3 depend on proper notice of the violations alleged with some articulation of the particular facts supporting them to demonstrate a claimant’s standing to assert them, permit LWDA accurately to assess the nature of the claims at issue, and provide an employer a reasonable opportunity to identify and endeavor to correct them.⁷

In sum, the LWDA has serious concerns with the PAGA notices your firm is filing and the practices described above. A claimant or claimant’s representative must participate in PAGA’s prelitigation administrative procedures in good faith. Abusive, evasive, or other tactics designed to frustrate the role of LWDA during these procedures, or the ability of employers to identify the nature of the claims actually at issue, will not be tolerated. An attorney presenting a matter to LWDA

⁶ It additionally is noted that each notice contains the same typographical or formatting errors, further evidencing the egregiousness of the high-volume filing practices engaged in here and the lack of attention or review given to any case.

⁷ Based on the information provided by your firm when submitting PAGA notices, many of the matters appear eligible for the cure procedures described in section 2699.3, subdivision (c)(2).

in accordance with PAGA's prelitigation administrative notice requirements is certifying the matter (1) is not being presented for an improper purpose, such as to harass a party; (2) the claims asserted are warranted and not frivolous; and (3) the allegations and other factual contentions are supported by evidence. (Code Civ. Proc., § 128.7, subd. (b); see *Williams, supra*, 3 Cal.5th at p. 545.)

III. Conclusion and Direction

For the foregoing reasons, you hereby are directed to file amended PAGA notices in each matter listed in the index included with this letter.⁸ All amended notices shall set forth those specific violations personally suffered by each particular claimant and describe the particular facts and theories supporting the specific violations alleged in each case. All amended PAGA notices must be filed via the online PAGA filing portal with service to the employer or any identified employer representative.

Moving forward, when submitting new or amended PAGA notices to LWDA using the online PAGA filing portal, please provide the name and contact information for the attorney responsible for the filing and whose name and signature appear on the PAGA notice itself. (Cf. p. 2, fn. 2, *supra*.)

Failure to comply prospectively with PAGA's prelitigation notice requirements may result in further action against you and/or your law firm, after due notice and an opportunity to be heard.

Sincerely,



Todd M. Ratshin
Deputy Secretary for Enforcement

cc: All Employers in the Matters Listed in the Following Index

⁸ The index is limited to matters pending before LWDA and within the applicable period for administrative investigation. (See § 2699.3, subd. (c)(1)(E).)

Index of PAGA Notices Filed by Mills Sadat Dowlat LLP
March 24, 2026 — May 27, 2026*
[Lab. Code, § 2699.3, subds. (a)(2)(B), (c)(1)(E)]

#	<u>LWDA # (LWDA-CM-)</u>	<u>Date Filed</u>	<u>Employer Name</u>	<u>Law Firm for PAGA Plaintiff (as Provided in Online Submission Form)</u>	<u>Plaintiff for PAGA Case</u>	<u>Identified Filer of PAGA Case</u>	<u>Attorney Whose Name Appears on PAGA Notice</u>
1	1179970-26	5/27/2026	McDonald's USA, LLC	Mills Sadat Dowlat LLP	Lesbia Lissette Rodriguez	Maria Lawhon	Arash Sadat
2	1179879-26	5/27/2026	Hanwha Q CELLS America Inc.	Mills Sadat Dowlat LLP	Michael Arellano	Isabella Fiorentino	Camron Dowlatshahi
3	1179055-26	5/21/2026	Ken Grody Redlands, LLC	Mills Sadat Dowlat LLP	Tracey Hooper	Maria Lawhon	Arash Sadat
4	1178915-26	5/21/2026	The Hanover Insurance Company	Mills Sadat Dowlat LLP	Andrea Lee	Maria Lawhon	Arash Sadat
5	1178495-26	5/19/2026	National Security Industries	Mills Sadat Dowlat LLP	Ruben Escobar	Isabella Fiorentino	Arash Sadat
6	1177142-26	5/13/2026	Momed II, L.P.	Mills Sadat Dowlat LLP	Cipriano Lopez Hernandez	Maria Lawhon	Camron Dowlatshahi
7	1177139-26	5/13/2026	Vector Marketing Corporation	Mills Sadat Dowlat LLP	Elias Olivarez	Maria Lawhon	Camron Dowlatshahi
8	1177137-26	5/13/2026	University Of La Verne	Mills Sadat Dowlat LLP	Ryan Russell	Maria Lawhon	Camron Dowlatshahi
9	1177133-26	5/13/2026	Universal Protection Service, LP	Mills Sadat Dowlat LLP	Keith Thomas	Maria Lawhon	Arash Sadat
10	1177129-26	5/13/2026	Corona Care LLC	Mills Sadat Dowlat LLP	Jennifer Vargas	Maria Lawhon	Arash Sadat
11	1176863-26	5/12/2026	Garfield Beach CVS, LLC	Mills Sadat Dowlat LLP	Oxana Khayrutdinova	Isabella Fiorentino	Camron Dowlatshahi
12	1176713-26	5/12/2026	Scripps Health	Mills Sadat Dowlat LLP	Frank Halcond	Chloe Jorgensen	Camron Dowlatshahi
13	1176706-26	5/12/2026	NP Mechanical, Inc.	Mills Sadat Dowlat LLP	Jimmy Acosta	Julio Anleu	Camron Dowlatshahi
14	1176695-26	5/11/2026	Mygrant Glass Company Inc.	Mills Sadat Dowlat LLP	Edgar McCarthy	Julio Anleu	Camron Dowlatshahi
15	1176685-26	5/11/2026	Guy Rents, Inc.	Mills Sadat Dowlat LLP	Zachary Yugovich	Julio Anleu	Camron Dowlatshahi
16	1176679-26	5/11/2026	Aqua Dulce Detox Center Inc.	Mills Sadat Dowlat LLP	Stella Diaz	Julio Anleu	Camron Dowlatshahi
17	1175612-26	5/6/2026	Foster Poultry Farms LLC	Mills Sadat Dowlat LLP	Javier Maya Hernandez	Isabella Fiorentino	Camron Dowlatshahi
18	1175432-26	5/5/2026	TherapyMatch, Inc. dba Headway	Mills Sadat Dowlat LLP	Daniel Blitch	Isabella Fiorentino	Camron Dowlatshahi
19	1174765-26	5/1/2026	Cardinal Health 200, LLC	Mills Sadat Dowlat LLP	Matthew Fitzgerald	Isabella Fiorentino	Arash Sadat
20	1173623-26	4/28/2026	Lowe's Home Centers, LLC	Mills Sadat Dowlat LLP	Ricardo Morino	Isabella Fiorentino	Camron Dowlatshahi

* The information set forth in this index is extracted from search results using the PAGA Case Search site, available at <<https://cadir.my.salesforce-sites.com/PagaSearch>>, for PAGA notices filed by "Mills Sadat Dowlat LLP" and "MSD Lawyers" from March 24, 2026, through May 27, 2026.

#	<u>LWDA # (LWDA-CM-)</u>	<u>Date Filed</u>	<u>Employer Name</u>	<u>Law Firm for PAGA Plaintiff (as Provided in Online Submission Form)</u>	<u>Plaintiff for PAGA Case</u>	<u>Identified Filer of PAGA Case</u>	<u>Attorney Whose Name Appears on PAGA Notice</u>
21	1171261-26	4/17/2026	Amazon.com Services, LLC	Mills Sadat Dowlat LLP	Vitor Luz	Chloe Jorgensen	Camron Dowlatshahi
22	1171224-26	4/17/2026	Amazon.com Services, LLC	Mills Sadat Dowlat LLP	Jamar Hampton	Chloe Jorgensen	Camron Dowlatshahi
23	1168750-26	4/7/2026	Market Pharmacy LLC	Mills Sadat Dowlat LLP	Luis Murillo	Julio Anleu	Camron Dowlatshahi
24	1168746-26	4/7/2026	Transdev Alternative Services Inc.	Mills Sadat Dowlat LLP	Riordan Diaz	Julio Anleu	Arash Sadat
25	1168611-26	4/7/2026	Kinomatic, Inc.	Mills Sadat Dowlat LLP	Jen Whitespear	Julio Anleu	Arash Sadat
26	1168605-26	4/7/2026	RXO, Inc.	Mills Sadat Dowlat LLP	Danilo Alas	Julio Anleu	Camron Dowlatshahi
27	1168600-26	4/7/2026	Universal Protection Service, LP	Mills Sadat Dowlat LLP	Angelo Washington	Julio Anleu	Camron Dowlatshahi
28	1167383-26	3/31/2026	ACD, LLC	Mills Sadat Dowlat LLP	Donna Cruz	Chloe Jorgensen	Arash Sadat
29	1166493-26	3/26/2026	Express Contractors Inc.	Mills Sadat Dowlat LLP	Carlos Mejia	Julio Anleu	Arash Sadat
30	1166438-26	3/26/2026	Alvarez Hardware, Inc.	Mills Sadat Dowlat LLP	Trevor Harris	Chloe Jorgensen	Arash Sadat
31	1177124-26	5/13/2026	Citiguard Inc.	MSD Lawyers	Daveon Clark	Maria Lawhon	Arash Sadat
32	1177116-26	5/13/2026	Momed II, L.P.	MSD Lawyers	John Monroy	Maria Lawhon	Camron Dowlatshahi
33	1177099-26	5/13/2026	Frito-Lays, Inc.	MSD Lawyers	Archer Edwards	Maria Lawhon	Arash Sadat
34	1176682-26	5/11/2026	Social Vocational Services, Inc.	MSD Lawyers	Judith Paz	Maria Lawhon	Camron Dowlatshahi
35	1176668-26	5/11/2026	Romero's Food Products, Inc.	MSD Lawyers	Joaquin Puentes	Maria Lawhon	Camron Dowlatshahi
36	1174666-26	5/1/2026	Tahoe Joe's Steakhouse LLC	MSD Lawyers	Emilia Alcaraz	Maria Lawhon	Camron Dowlatshahi
37	1174655-26	5/1/2026	Brosnan Risk Consultants, LTD	MSD Lawyers	Veronica Hernandez Paloz	Maria Lawhon	Camron Dowlatshahi
38	1172097-26	4/22/2026	Alvy Delivers, Inc.	MSD Lawyers	Gustavo Escobar de Paz	Maria Lawhon	Camron Dowlatshahi
39	1170627-26	4/15/2026	CortPeters Inc.	MSD Lawyers	Kerry Lynne Howard	Maria Lawhon	Camron Dowlatshahi
40	1166824-26	3/28/2026	Darden Restaurants, Inc.	MSD Lawyers	Amber Tate	Maria Lawhon	Camron Dowlatshahi