

NOTICE TO THE LABOR AND WORKFORCE DEVELOPMENT AGENCY AND
EMPLOYER PURSUANT TO CALIFORNIA LABOR CODE § 2699.3

Date: April 19, 2026

Aggrieved Employee:

Justin Daniel Gallant

[REDACTED]

[REDACTED]

Employer:

24HR Homecare L.L.C.

200 North Pacific Coast Hwy, Ste 300

El Segundo, CA 90245

Roseville Regional Office:

516 Gibson Dr., Ste. 200

Roseville, CA 95678

Registered Agent for Service of Process:

Capitol Corporate Services, Inc.

455 Capitol Mall, Ste. 217

Sacramento, CA 95814

Pursuant to Labor Code sections 2698 et seq. (§ 2699.3), this letter provides notice of claims for civil penalties under the Private Attorneys General Act ("PAGA") on behalf of the undersigned and other aggrieved employees against 24HR Home Care, L.L.C. for overtime, wage statement, and related

violations arising from Defendant's written policy and practice of denying legally required daily overtime to California Regional Center employees.

I. BACKGROUND

The undersigned has been employed by 24HR Homecare L.L.C. (and its predecessor entity) as a non-live-in home care worker providing services at a private residence in Vacaville, California. Employment commenced in approximately 2022 and continued through the present date. The employer acquired the undersigned's employment relationship from a predecessor entity in approximately February 2024.

At all relevant times, the undersigned was a non-live-in, non-exempt home care worker employed by 24HR Home Care, L.L.C. to provide services in a private household in California. Defendant failed to pay legally required daily overtime for work performed in excess of the applicable California threshold. To the extent Defendant contends the undersigned was a "personal attendant," California law required overtime compensation for hours worked in excess of nine (9) hours in a workday and forty-five (45) hours in a workweek. To the extent Defendant contends the undersigned was not a personal attendant because the job included substantial non-attendant duties, California law required overtime compensation for hours worked in excess of eight (8) hours in a workday and forty (40) hours in a workweek, with double time where applicable. In either case, Defendant's policy and practice of denying daily overtime to California Regional Center workers was unlawful.

II. VIOLATIONS

1. Failure to Pay Overtime — Labor Code §§ 510, 1194

Based on the foregoing, Defendant violated California law by, among other things:

1. Failing to pay all overtime wages owed for hours worked in excess of the applicable daily and weekly thresholds;
2. Maintaining and enforcing a written policy that unlawfully denied daily overtime to California Regional Center employees;
3. Failing to furnish accurate itemized wage statements reflecting all overtime hours, rates, and wages earned; and
4. Failing, after prior notice and prior proceedings, to correct unlawful payroll practices affecting the undersigned and, on information and belief, other aggrieved employees.

The employer has systematically failed to pay overtime compensation for hours worked in excess of the applicable California daily and weekly overtime thresholds, including hours worked in excess of eight (8) or nine (9) hours in a workday and forty (40) or forty-five (45) hours in a workweek, depending on the employee's classification and duties. The violations are ongoing and recurring, as evidenced by the following examples. First, on or about January 17, 2026, the undersigned worked approximately twelve (12) consecutive hours in a single workday in California. Second, during the pay period of March 16–31, 2026, the undersigned was paid for twenty (20) straight-time hours at a rate of \$20.00 per hour (gross pay \$400.00), twelve (12) of which were worked consecutively in a single workday, triggering the daily overtime obligation under California law. In both instances, Defendant paid all hours at straight-time rate with no overtime premium applied. Whether analyzed under the nine-hour daily threshold applicable to personal attendants or the eight-hour daily threshold applicable to non-attendant domestic workers, Defendant failed to pay all overtime wages required by California law. These repeated, consecutive violations—occurring across multiple pay periods even after the employer was placed on notice through prior arbitration proceedings and contact with the Division of Labor Standards Enforcement—confirm that the violation is systemic and ongoing rather than isolated.

Defendant maintained and applied a written overtime policy stating, in substance, that California Regional Center employees were not entitled to daily overtime and would receive overtime only for hours worked in excess of forty (40) hours in a workweek. That policy improperly applied a weekly-only overtime standard to California work and unlawfully denied daily overtime

protections required under California law for non-live-in domestic workers and/or personal attendants working in private households in California. This failure is not the result of inadvertent error. The employer's own employee handbook explicitly states that "California regional center employees" are subject to the overtime standards of the State of Arizona rather than California. This written policy constitutes a deliberate, policy-level violation of California overtime law, including Labor Code § 510 and other applicable California overtime provisions, because it denies daily overtime protections required for non-live-in home care workers in California including under the applicable eight-hour or nine-hour daily threshold depending on classification.

The undersigned previously pursued a wage claim arising from the same or substantially similar overtime practices, which resulted in a settlement and/or award placing the employer on actual notice of its unlawful overtime policy and pay practices. Following that arbitration award, the employer continued the same pattern of violations without correction. When the undersigned subsequently contacted the Division of Labor Standards Enforcement to get in contact with employer contact person who insisted on a discussion, the employer reiterated and doubled down on its Arizona overtime policy. The violations are ongoing and systematic. Despite that notice, Defendant failed to timely comply and, on information and belief, continued to maintain and apply the same unlawful overtime policy to California employees.

2. Failure to Provide Accurate Wage Statements — Labor Code § 226

The employer has failed to provide accurate itemized wage statements as required by Labor Code § 226. Specifically, wage statements issued to the undersigned reflect only straight-time hours worked without any breakdown of overtime hours, overtime rates, or overtime compensation owed. This omission injures the undersigned by preventing verification of whether wages have been correctly calculated and paid.

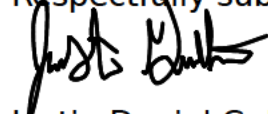
III. AFFECTED EMPLOYEES

Upon information and belief, the employer's written policy applying Arizona overtime standards to California employees applies to all employees classified as "regional center" workers throughout the employer's California operations. The violations described herein are therefore not limited to the undersigned but affect all similarly situated non-live-in home care employees of 24HR Homecare L.L.C. working in California.

IV. RELIEF SOUGHT

The undersigned intends to bring a civil action pursuant to Labor Code § 2699 et seq. to recover civil penalties on behalf of the State of California and all aggrieved employees, in addition to any other relief available under law.

Respectfully submitted,



Justin Daniel Gallant

