



May 20, 2026

VIA ONLINE FILING

Labor and Workforce Development Agency
Attn.: PAGA Administrator
800 Capitol Mall, MIC-55
San Francisco, CA 95814
PAGAfilings@dir.ca.gov

Re: Patrick Sandiford v. Sharp Rees-Stealy Medical Group, Inc., et al.

Dear Representative:

Our offices represent Patrick Sandiford, M.D. (“Dr. Sandiford”) with respect to his claims under the California Labor Code against Sharp Rees-Stealy Medical Group, Inc. (“Defendant”) in San Diego, California.

This letter is intended to constitute notice of claims, including notice pursuant to the California Labor Code Private Attorneys General Act of 2004, California Labor Code section 2698, *et seq.* (“PAGA”) that Dr. Sandiford intends to bring a civil action for penalties under PAGA for California Labor Code violations committed by Defendant against Dr. Sandiford and other current and/or former Defendant’s employees in California (“Aggrieved Employees”). Dr. Sandiford’s PAGA action involves Defendant’s violation of sections 204, 210, 226(a), 226.3, 246, 246.5, 247.5, 1174, 1174.5, 1197, and 1198.5 of the California Labor Code. This letter is being sent in compliance with California Labor Code section 2699.3.

As outlined below and throughout this complaint, Defendant violated several of California’s wage and hour laws before, during, and after Dr. Sandiford’s employment. At the forefront, Defendant willfully misclassified Dr. Sandiford and other employees as independent contractors. Defendant regularly failed to provide timely rest or meal periods or premiums, payment of the correct minimum and overtime wages, timely payment of wages, reimbursement of business expenses, sick pay, timely payment upon separation, and maintenance of payroll and time records for employees.

Defendant’s Violation of Sections 204 and 210:

Defendant engaged in numerous unlawful practices, which resulted in the failure to pay Dr. Sandiford and Aggrieved Employees for all time worked at the correct rates of pay.



During at least the year immediately preceding the date of this letter, Dr. Sandiford and other of Defendant's employees in California were regularly required to work off-the-clock in order to complete their duties and responsibilities. This off-the-clock work included, amongst other things, requiring Dr. Sandiford and Aggrieved Employees to remain "on-call" subject to Defendant's control and being required to perform administrative tasks. Dr. Sandiford and Aggrieved Employees were not compensated for this off-the-clock work, which resulted in the failure to pay minimum wages and straight-time wages.

During at least the year immediately preceding the date of this letter, Dr. Sandiford and Aggrieved Employees were not paid the proper regular rate of pay for their accrued vacation. Instead of paying Dr. Sandiford and Aggrieved Employees their correct regular rate of pay for vacation hours, Defendant paid Dr. Sandiford and Aggrieved Employees their lowest hourly rate during the pay period.

During at least the year immediately preceding the date of this letter, Dr. Sandiford and other of Defendant's employees in California were not timely paid wages earned. Defendant withheld earned wages and refused to timely pay said wages. As a result, Defendant violated Labor Code sections 204 and 210.

Defendant's Violation of Section 226(a):

Section 226(a) states in pertinent part that: "An employer...shall furnish to his or her employee...an accurate itemized statement in writing showing (1) gross wages earned, (2) total hours worked by the employee..., (3) the number of piece-rate units earned and any applicable piece rate..., (4) all deductions..., (5) net wages earned, (6) the inclusive dates of the period for which the employee is paid, (7) the name of the employee and only the last four digits of his or her social security number or an employee identification number..., (8) the name and address of the legal entity that is the employer..., and (9) all applicable hourly rates in effect during the pay period...." Additionally, the "Records" section of the applicable California Industrial Welfare Commission ("IWC") Wage Order ("Wage Order") requires accurate recordkeeping, including records relating to time and pay.

During at least the year immediately preceding the date of this letter, Dr. Sandiford and Defendant's other California employees were not issued itemized wage statements or issued itemized wage statements that did not comply with the requirements under either Section 226(a) or under the requirements of the "Records" section of the applicable IWC Wage Order. The wage statements Defendant provided to Dr. Sandiford and other Defendant's employees in California fail to comply with the requirements of Section 226(a). As a result, the earned wages (net and gross) and deductions were not adequately listed, the corresponding number of hours worked at each hourly rate and the total hours worked were not adequately listed, and all applicable hourly rates were omitted. Moreover, the correct name and address of the legal entity that is the employer are incorrect.

Defendant's Violation of Section 1197:



Section 1197 provides that the payment of less than minimum wage is unlawful. The “Minimum Wages” section of the applicable IWC Wage Order provides that every employer must pay to each employee on the established payday for the period involved, not less than the applicable minimum wage for all hours worked in the pay period. During at least the year immediately preceding the date of this letter, Defendant failed to pay its California employees at least minimum wage for all time worked, including, but not limited to, through its actions of: (i) failing to pay all hours worked during the pay period; and (ii) failing to pay for the entirety of hours worked at the proper rate.

Defendant failed to record Dr. Sandiford’s and the Aggrieved Employees’ time accurately and failed to pay Dr. Sandiford and the Aggrieved Employees for all hours worked. Defendant paid Dr. Sandiford and the Aggrieved Employees hourly, yet Defendant failed to keep an accurate record of hours worked. Dr. Sandiford’s and the Aggrieved Employees lack proper employee records for those performing off-the-clock work and/or who were subject to the necessary control of Defendant. Moreover, Dr. Sandiford’s and the Aggrieved Employees’ employee records do not indicate the actual time worked, which fails to compensate them for days they may have arrived early, left late, or any variation to a regular workday that would be typical of a full-time employee.

Defendant’s Violations of Sections 246 and 246.5:

Defendant has violated the Healthy Workplaces, Healthy Families Act of 2014, Labor Code sections 245-249, by not having policies and procedures for the workers to accrue and use paid sick leave. Labor Code section 246(b) requires, *inter alia*, that an employer provide for an employee to accrue paid sick leave “at the rate of not less than one hour per every 30 hours worked” and not less than 24 hours (or three days) of paid sick leave by the completion of the employee’s 120th calendar day of employment.

Because of Defendant’s violations of the paid sick day requirements, Defendant is liable for civil penalties under Labor Code section 248.5 in an amount equal to “fifty dollars (\$50) for each day or portion thereof that the violation occurred or continued, not to exceed an aggregate penalty of four thousand dollars (\$4,000).”

Defendant is also liable for civil penalties under Labor Code sections 2699(f)(1)-(2) for each Aggrieved Employee per pay period and for civil penalties pursuant to Labor Code section 558 as follows:

“(1) For any initial violation, fifty dollars (\$50) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages. (2) For each subsequent violation, one hundred dollars (\$100) for each underpaid employee for each pay period for which the employee was underpaid in addition to an amount sufficient to recover underpaid wages. (3) Wages recovered pursuant to this section shall be paid to the affected employee.... (d) The civil penalties provided for in this section are in addition to any other civil or criminal penalty provided by law.”



Moreover, because of Defendant's unlawful policies of punitively assigning "on-call" shifts when an employee utilizes accrued sick days, Defendant has discriminated and retaliated against Dr. Sandiford and the Aggrieved Employees in violation of Labor Code section 246.5.

Applicable PAGA Civil Penalty:

PAGA, specifically Section 2699(a), permits an aggrieved employee to recover civil penalties set forth within the California Labor Code for violation of the California Labor Code. In addition, Section 2699(f) establishes civil penalties for violations of California Labor Code provisions that do not contain their own civil penalties. Dr. Sandiford intends to bring a civil action to recover civil penalties for the violations identified above, including civil penalties pursuant to Section 2699(f), as well as those civil penalties specifically set forth within the text of the California Labor Code. These penalties are sought for violations committed against Dr. Sandiford and Defendant's other California employees.

Please feel free to contact the undersigned with any questions you may have.

Very truly yours,

HOSSEINI LEGAL, PC

Kaveh S. Hosseini

Notice provided to Defendant via Certified Mail (# 940711189876552779229)

Sharp Rees-Stealy Medical Group, Inc.
c/o Michael C. Martin, Registered Agent
5651 Copley Drive, Suite A
San Diego, CA 92111