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Private Attorneys General Act (PAGA) Complaint

Chandra Rodgers vs. City of Hope Medical Center

Labor Code Violations caused by Illegal Payroll Practices and Erroneous, Retaliatory Payroll Adjustments

A. 1st Cause of Action - Unpaid, Short Paid, and Delinquent Wages

B. 2nd Cause of Action - Short and Late Payment of Wages

C. 3rd Cause of Action - Wage Theft

D. 4th Cause of Action - Unpaid Vacation at Termination

E. 5th Cause of Action - Waiting Time Penalties

F. 6th Cause of Action - Missing Wage Statements

G. 7th Cause of Action - Inaccurate Wage Statements

H. 8th Cause of Action - Inaccurate Employee Payroll Records

I. 9th Cause of Action - Uncured Equal Pay Act Violations

J. 10th Cause of Action - Whistleblower Retaliation and Harassment

K. 11th Cause of Action - Nonpayment of Interest on Backpay and Unpaid Wages

A. FIRST CAUSE OF ACTION:

UNPAID, SHORT PAID and DELINQUENT WAGES

Labor Codes: LC § 96 | 558 | 1194 | 204 | 210 | AB673

1. DOCKED WAGES

This cause of action is being brought pursuant to Labor Codes 96, 558 and 1194, which grants employees the right to file claims with California's Labor Commissioner to report employment labor violations, recover unpaid wages, and seek civil penalties against the employer for wage & hour violations.

The Plaintiff alleges that the Defendant intentionally violated wage & hour laws by unlawfully altering her Employee Timesheet and improperly docking 14.4 hours of her wages in May 2025 without explanation or just cause, and in retaliation for the Plaintiff's engagement in protected activities. The related retaliatory backend payroll adjustments caused the Plaintiff to receive inaccurate wage statements, such as on 5/23/2025 that included a short payment of \$1,279. The Defendant never informed the Plaintiff about the docked wages or specified which work dates were docked. Nor did the Defendant or properly disclose or explain the pay reduction on the Plaintiff's wage statements in the respective "ADJUSTMENTS" or "MESSAGES" sections. All of which resulted in improper and inaccurate wage statements.

Pursuant to Labor Code 558, the Plaintiff seeks civil penalties to hold the Defendant accountable for their unlawful wage docking as well as the resulting compounded labor code violations (i.e., unpaid wages, underpaid wages, delinquent payment of wages, wage theft, and more inaccurate wage statements). The Plaintiff's final paychecks dated 5/23/25, 6/4/25, and 6/6/25 reflect the \$1,279 pay cut on 5/23/25, and the Defendant's failure to correct and reimburse the Plaintiff on subsequent paychecks in the following month.

2. DENIED 8 HOURS of PAID PERSONAL HOLIDAY

Pursuant to Labor Codes 96, 558 and 1194, the Plaintiff seeks civil penalties against the Defendant for allegedly violating wage and hour laws by refusing to pay employee wages upon the preapproved use of their allotted accrued time-off benefits.

Case in point, the Plaintiff alleges that, her manager (Edward English) preapprove the use of her last paid Personal Holiday (8 hours of wages) in February 2025, but the Defendant's Payroll Staff applied backend payroll adjustments in the Centricity Time & Attendance System that unlawfully altered the Plaintiff's Employee Time Sheet, reversed her submitted time-off request, and overrode her manager's digital approval. The entries occurred without the Plaintiff's knowledge or consent, and while she was out on the pre-approved time off. Because of this, she was denied 8 hours of wages in February 2025.

When the Plaintiff rescheduled and obtained her manager's approval for the use of her last Personal Holiday for 5/8/25, Human Resources & Payroll Staff applied retaliatory backend payroll adjustments that effected the same aforementioned reversals, but they also misapplied her Vacation hours to 5/8/25 without the Plaintiff's knowledge or consent. In violation of wage & hour laws retaliatory backend payroll adjustments caused the Plaintiff to be deprived of 8 hours of wages. They also forced forfeiture of her last Personal Holiday at the time of her wrongful termination.

3. UNCURED EQUAL PAY ACT VIOLATIONS

This cause of action is being brought pursuant to Labor Codes 96, 558 and 1194, to report labor code violations and to seek remedies and civil penalties against the Defendant, based on victim's accounts, and information and belief, that the Defendant is in the practice of violating Pay Equity and Equal Pay Act laws by refusing to pay aggrieved female employees backpay for all unpaid wages resulting from months or years of Equal Pay Act violations.

Case in point, the Plaintiff alleges that, in violation of wage & hour, Pay Equity, and Equal Pay Act laws, the Defendant intentionally delayed and refused to fully cure Equal Pay Act violations involving the Plaintiff. In doing so, the Defendant short paid the retroactive backpay the Plaintiff was entitled to. The Defendant acknowledged and reimbursed the initial \$44k short payment that the Plaintiff discovered, but they refused to redress the remaining shortfall of unpaid wages estimated at over \$20k.

All of the Plaintiff's wage statements received in January to June 2025 prove that the Defendant did not make any additional lumpsum payments to fully cure the Equal Pay Act violations. Thus, pursuant to Labor Code 96, the Plaintiff seeks to hold the Defendant responsible for failing to reimburse the Plaintiff for all unpaid wages. This PAGA complaint also seeks to identify all other aggrieved female employees within COH's Info Technology division who experienced Equal Pay Act violations, but the Defendant intentionally failed to offer full cures in accordance with the law.

B. SECOND CAUSE OF ACTION:

WAGE THEFT

Labor Codes: LC § 215

This cause of action is being brought pursuant to Labor Code § 215, which establishes criminal penalties for employers who violate labor laws involving improper wage payments. The Plaintiff alleges that the Defendant intentionally docked and withheld her earned wages without just cause or explanation. Below are some examples.

1. DOCKED WAGES

The Plaintiff re-alleges that, Defendant intentionally violated wage & hour laws by unlawfully docking 14.4 of her work hours, causing her to receive insufficient pay totaling \$1,279 on her 5/23/2025 wage statement. The pay reduction was made without just cause, and is alleged to have been made in retaliation for the Plaintiff's engagement in protected activities.

Pursuant

Case in point, the Plaintiff's final paychecks dated 5/23/25, 6/4/25, and 6/6/25 reflected the Defendant's retaliatory payroll adjustments that unlawfully decreased her earned wages by \$1,279. The Defendant failed to notify the Plaintiff about the docked wages, specify which work dates were docked, or properly disclose and explain the backend adjustments on her wage statements in the "ADJUSTMENTS" or "MESSAGES" sections. For which, the Plaintiff is entitled to be fully reimbursed for all unlawfully docked wages plus interest.

2. DENIAL of PAID PERSONAL HOLIDAY (8 hours of wages)

The Plaintiff alleges that the Defendant violated labor code § 215 again when they deprived her of 8 hours of wages by denying her the use of her last paid Personal Holiday on two separate occasions. NOTE: COH employees receive 3 paid Personal Holidays a year that they are allowed to freely use upon receiving management approval---the same as they seek approvals for the use of their accrued Vacation hours. Based on information and belief, COH's illegally backend payroll adjustments caused other aggrieved employees to be deprived of their earned wages, as was frequently experienced by the Plaintiff as show in the following example.

1st Reversal of Personal Holiday in Feb 2025 - On 2/3/25, the Plaintiff received approval from her manager (Edward English) to use he last Personal Holiday on 2/10/25. But, subsequently, Payroll Staff circumvented the Centricity Time & Attendance System by applying erroneous backend payroll adjustments that illegally altered her Employee Time Sheet, reversed the official time-off request for her scheduled Personal Holiday, and negated her manager's digital approval. The manual reversal was done without the Plaintiff's knowledge or consent.

2nd Reversal of Personal Holiday in May 2025 - Due to the Payroll Department's aforementioned wrongful cancellation of the use of her last Personal Holiday, the Plaintiff submitted another time-off request in the Centricity System to obtain her manager's approval for the use her last Personal Holiday on 5/8/25. But, once again, Payroll Staff, at the behest of Human Resources, applied more erroneous backend payroll adjustments that illegally altered her Employee Time Sheet, reversed her rescheduled Personal Holiday, and negated her manager's digital approval---without explanation, or the Plaintiff's knowledge or consent.

Forced Forfeiture of 8 hours of Wages - Human Resources' and the Payroll department's wrongful, unjustified reversals and cancellation of the use of her last Personal Holiday intentionally deprived her of 8 hours of paid wages. Shortly thereafter, her accrued Personal Holiday balance showed 8 unused hours remaining at the time of her termination. Thus, HR and Payroll Staff unlawfully forced the forfeiture of the Plaintiff's last Personal Holiday (8 hours of paid wages).

Compounded Labor Violations - This recurring payroll issue shows how COH's backend payroll adjustments are unlawful and repeatedly results in compounded labor code violations, such as unpaid wages, underpaid wages, delinquent payment of wages, wage theft, waiting time penalties, and more inaccurate wage statements. These payroll errors were reflected on her 5/23/25, 6/4/25 and 6/6/25 wage statements, rendering them inaccurate.

Tangible Visual Evidence - Below are screenshots of automated email notification from the Centricity Time & Attendance System dated 2/3/2025 and 5/8/2025 informing me of my manager's (Ed English's) online approval of the use of my last Personal Holiday originally scheduled for 2/10/25, then forcibly rescheduled for 5/8/2025. But, in error and in retaliation, Human Resources and Payroll Staff reversed both approvals without just cause, thereby forcing the forfeiture of the paid employee benefit.

EXHIBIT #1: First Centricity email approval in February 2025 that Payroll

EXHIBIT #2: Second Centricity Email Approval in May 2025 that HR & Payroll reversed again:

Chandra Rodgers

From: COH_Time_&_Attendance_Request_DO_NOT_REPLY@coh.org

Sent: Monday, February 3, 2025 11:43 AM

To: Chandra Rodgers

Subject: COH Time and Attendance System - Employee Calendar Request Status Changed

Your request to add a transaction has been Approved.

Requested On: 02/03/2025 at 07:17

Reason: Time off - Personal Holiday

Reviewer: Edward English

Reviewed On: 02/03/2025 at 11:43

Date: 02/10/2025

Time: 07:00

Hours: 8.00

Pay Code: PERS - PERSONAL HOLIDAY

Facility : 001 - City Of Hope

Department : 8480250 - Enterprise Tech&Intra Oper

Job Class: 001063 - Senior Enterprise Architect

Chandra Rodgers

From: COH_Time_&_Attendance_Request_DO_NOT_REPLY@coh.org

Sent: Thursday, May 8, 2025 3:46 PM

To: Chandra Rodgers

Subject: COH Time and Attendance System - Employee Calendar Request Status Changed

Your request to add a transaction has been Approved.

Requested On: 05/06/2025 at 07:44

Reason: Emergency time off

Reviewer: Edward English

Reviewed On: 05/08/2025 at 15:46

Date: 05/08/2025

Time: 07:00

Hours: 8.00

Pay Code: PERS - PERSONAL HOLIDAY

Facility : 001 - City Of Hope

Department : 8480250 - Enterprise Tech&Intra Oper

Job Class: 001063 - Senior Enterprise Architect

FINAL PAGA NOTICE - Chandra Rodgers vs City of Hope (5-23-2026) 2nd PAGA - May 2026

2 of 5 5/23/2026 7:59 PM

Private Attorneys General Act (PAGA) Complaint
Chandra Rodgers vs. City of Hope Medical Center
Labor Code Violations caused by Illegal Payroll Practices and Erroneous, Retaliatory Payroll Adjustments

C. THIRD CAUSE OF ACTION: UNPAID VACATION at TERMINATION

Labor Codes: LC § 227.3

Pursuant to labor code §227.3, the Plaintiff seeks to hold the Defendant accountable and recover all payment for all unused vacation hours at the time of her termination. The Plaintiff's final paychecks in June 2025, did not include full payment of all of her unused Vacation due to the Defendant's gross mismanagement of her accrued time-off balances, which severely impacted her accrued Vacation hours.

Case in point, from February through June 2025, the Defendant's Human Resources and Payroll Staff repeatedly applied erroneous backend payroll adjustments that wrongfully depleted, reversed and misapplied the Plaintiff's accrued Vacation Hours, Sick Leave, Personal Holidays, and Extended Illness Bank(EIB) without, her knowledge or consent. The retaliatory payroll adjustments resulted in more compounded wage & hour violations, inaccurate payroll records and an inaccurate remaining balance in the Plaintiff's accrued Vacation account at the time of her wrongful termination, on 6/2/25. In turn, the Defendant did not accurately calculate or pay the Plaintiff for all unused vacation hours at the time her employment ended.

D. FOURTH CAUSE OF ACTION: WAITING TIME PENALTIES

Labor Codes: LC § 203 | 256

Pursuant to labor codes §§ 203 and 256, the Plaintiff seeks civil penalties to hold the Defendant accountable for willfully failing to fully and promptly pay all employee wages due at termination. It also seeks to identify other similarly situated aggrieved COH employees who received severely delinquent or unpaid wages.

The Plaintiff alleges that, for years, the Defendant intentionally delayed and withheld her wages on multiple occasions, and the most recent incidents occurred in May and June 2025, as described in the examples below.

Unpaid Wages in May 2025 - As explained in the Third Cause of Action entitle WAGE THEFT, in May 2025, the Defendant applied retaliatory payroll adjustments that erroneously reduced her work hours by 14.4 hours, which unlawfully docked her regular wages \$1,279. The Defendant made the entries without just cause. The Plaintiff never received an explanation or reimbursement for the unlawful retaliatory pay cut. Therefore, pursuant to labor code..... she is legally entitled to pursue reimbursement for her unlawfully docked wages along with waiting time penalties for the delinquent payment of wages.

Unpaid Wages in June 2025 - The Plaintiff is seeking waiting time penalties for due to the Defendant's mismanagement and wrongful depletion of the Plaintiff's accrued Vacation hours, City of Hope failed to maintain accurate payroll records. This resulted in the Defendant failing to properly calculate and pay the Plaintiff for all of her unused vacation hours at the time her employment ended. Thus, pursuant to Labor Codes §§ 203 and 256, the Plaintiff is legally entitled to pursue waiting time penalties for nonpayment of all unused vacation.

Unpaid Backpay for Equal Pay Act Violations - Noteworthy, the Plaintiff's final paychecks in May and June 2025 also reflect the nonpayment of additional backpay that the Plaintiff alleges is still owed to her due having received only partial cures for the Equal Pay Act violations she experienced while working in COH's Info Technology division. For which, upon confirmation, she would be entitled to waiting time penalties.

E. FIFTH CAUSE OF ACTION: MISSING WAGE STATEMENTS

Labor Codes: LC § 226 | 226.3 | 226.6

Labor Codes §§ 226, 226.3, 226.6, 247.5 obligate Employer's to provide accurate itemized wage statements to employees every pay period, and they impose civil penalties, fines, and possible misdemeanor charges on employers who fail to do so. Pursuant to these labor codes, the Plaintiff seeks civil penalties against the Defendant, based on information and belief, that the Defendant fails to provide bi-weekly wage statements to employees on leaves of absence. She also alleges that the Defendant negligently fails to provide terminated employees with their final wage statements that are direct deposited into their bank accounts. These unlawful wage statement violations may be the norm at City of Hope. The Plaintiff was personally experienced both aforementioned scenarios.

Case in point, while the Plaintiff was on two separate leaves of absence, the Defendant failed to email, mail, or grant her access to her wage statements while she was out of office. Then, upon her wrongful termination, City of Hope failed to provide her with a copy of her final paycheck that was direct deposited into her bank account on 6/6/2025. As of 5/2026, she still has not received a copy of her final 6/6/2025 paycheck..

This PAGA complaint seeks to hold City of Hope accountable to correct their illegal payroll practices to ensure that, going forward, all employees receives or has access to copies of each of the bi-weekly wage statements throughout their employment at City of Hope and upon termination.

F. SIXTH CAUSE OF ACTION: INACCURATE WAGE STATEMENTS

Labor Codes: LC § 226 | 226.3 | 226.6 | 247.5

Pursuant to Labor Codes §§ 226, 226.3, 226.6, 247.5, which obligates Employer's to provide accurate itemized wage statements to employees every pay period, and imposes civil penalties, fines, misdemeanor charges on employers who fail to do so, civil penalties are being sought against the Defendant for failing to consistently provide accurate wage statements to its employees, and frequently applying backend payroll adjustments that cause numerous payroll errors that result in inaccurate wage statement.

Backend Payroll Adjustments and Frequent Payroll Errors

Case in point, in the Plaintiff's case, in violation of wage & hour laws, the Defendant's Human Resources and Payroll Staff frequently overrode its Centricity Time & Attendance system approx. 25 to 30 different times to apply numerous erroneous and retaliatory backend payroll adjustments that drastically altered and falsified her Employee Timesheets, wrongfully depleted and misapplied her accrued time-off balances (e.g. vacation, sick leave, etc.), illegally docked her wages, and more—without the Plaintiff's knowledge or consent. The erroneous backend payroll adjustments numerous payroll errors, compounded labor code violations, and cause the generation of consecutive inaccurate wage statements with incorrect wages, Payroll Pay Types, accrued time-off balances, and other inaccuracies. The Defendant also fails to properly disclose or explain the manual payroll adjustments on employee paychecks in the "ADJUSTMENTS" and "MESSAGES" sections, allegedly resulting in incomplete payroll records and improper wage statements.

Other Impacted Aggrieved Employees

Base on information and belief, the erroneous backend payroll adjustments are a common practice at City of Hope, that has financially harmed many current and past male and female employees. This PAGA complaints seeks civil penalties and injunctive relief to require the Defendant to reimburse all consequential unpaid and short paid wages to aggrieved employees, and to stop and correct these unlawful payroll practices.

Plaintiff Examples and Visual Evidence

Evidence of the Defendant nefariously applying retaliatory backend payroll adjustments to erroneously deplete the Plaintiff's Vacation hours without her knowledge or consent, can be seen below in the screenshot showing Chandra Rodgers online Time Card Report in the Centricity Time & Attendance System as of May 29, 2025. It shows notes entered by Payroll Staff (Koreen Hernandez) regarding a request she received from Joel Monje (HR Leave & Disability Manager) requesting the depletion of several of the Plaintiff's accrued Vacation days without her consent. This resulted in several payroll errors because some of the dates were days that she reported to work, they wrongfully reversed her manager's approval for the use of her last Personal Holiday (8 hours of wages) that was scheduled for 5/8/2025, and they also illegally docked 14.4 hours of her regular wages.

City of Hope	EXHIBIT #3 - BACKEND PAYROLL ADJUSTMENTS in the CENTRICITY SYSTEM requested by HR and entered by Payroll Staff on 5/28/25			Time Card Report 05/18/2025 - 05/31/2025 Thursday, May 29, 2025 12:12
General Information				
Code:	Facility:	001	City Of Hope	
Name: Rodgers, Chandra J	Department:	8480250	Enterprise Tech&Intra Oper	
Employee Notes				
Created	Author	Subject	Body	
05-08-2025 15:46	Chandra Rodgers	Requested Reason	Emergency time off	
05-08-2025 15:46	Chandra Rodgers	Requested Reason	Emergency time off	
05-08-2025 15:46	Chandra Rodgers	Requested Reason	Emergency time off	
05-08-2025 15:47	Chandra Rodgers	Requested Reason	Emergency time off	
05-09-2025 15:49	Chandra Rodgers	Requested Reason	Emergency time off	
05-28-2025 07:43	Koreen Hernandez	LOA	Emergency time off - Entering the intended last day of PTO - Friday 5/23/2025 ADJ PPE 5/17/25 PER JOEL MONJE: I would like to request a pay adjustment for the following employee, who was on leave from May 7, 2024, to May 26, 2025, and returned to work on May 27, 2025. Per guidance from our HR Strategic Partner, I am requesting that 100% vacation (VAC) pay be applied for the entire duration of the leave.	

ADJ PPE 5/17/25 PER JOEL MONJE:
I would like to request a pay adjustment for the following employee, who was on leave from May 7, 2024, to May 26, 2025, and returned to work on May 27, 2025. Per guidance from our HR Strategic Partner, I am requesting that 100% vacation (VAC) pay be applied for the entire duration of the leave.

To show evidence of the Defendant's pattern of wrongfully depleting employee Vacation hours without their consent, below is an email the Plaintiff sent Payroll staff to inform them that their erroneous backend payroll adjustments unlawfully depleted 80 of her accrued Vacation hours and misapplied them to days that she actually reported to work. No one at COH ever informed her about the backend changes, nor did they disclose or explain the changes in the "ADJUSTMENTS" or "MESSAGES" section on her wage statement.

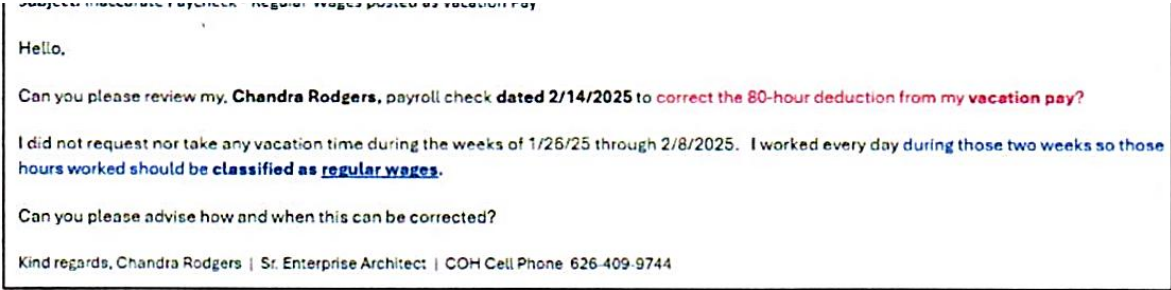
From: Chandra Rodgers <crodders@coh.org>
Sent: Friday, March 21, 2025 12:41 PM
To: Corporate Accounting Payroll <Payroll@coh.org>
Subject: Inaccurate Paycheck - Regular Wages posted as Vacation Pay

EXHIBIT #4 - Email Inquiry - Depleted Vacation Hours

Private Attorneys General Act (PAGA) Complaint

Chandra Rodgers vs. City of Hope Medical Center

Labor Code Violations caused by Illegal Payroll Practices and Erroneous, Retaliatory Payroll Adjustments



To show evidence of the Defendant’s pattern of wrongfully depleting employee Vacation hours without their consent, below is an email the Plaintiff sent Payroll staff to inform them that their erroneous backend payroll adjustments unlawfully depleted 80 of her accrued Vacation hours and misapplied them to days that she actually reported to work. No one at COH ever informed her about the backend changes, **nor did they disclose or explain the changes in the "ADJUSTMENTS" or "MESSAGES" section on her wage statement.**

EXHIBIT #5 - Correction to previous payroll error, but the Pay Period dates (2/7/2025) are inaccurate.

HOURS AND EARNINGS							
Description	Pay Period		Rate	Current Hours	Earnings	YTD	
	Begin Date	End Date				Hours	Earnings
*Regular			88.820379	8.00	710.56	224.00	19,895.77
*Regular	02/07/2025	02/07/2025	88.820379	72.00	6,395.07		0.00
Vacation	02/07/2025	02/07/2025	88.820379	-72.00	-6,395.07	62.96	5,592.13
Holiday					0.00	24.00	2,131.68
Pers Hol					0.00	16.00	1,421.13
Sick Pay					0.00	24.00	2,131.69
WFHNonTxbl					0.00		55.00
*Total Hours Worked:				80.00	7,105.63	224.00	19,895.77
TOTAL:				8.00	710.56	350.96	31,227.40

G. SEVENTH CAUSE OF ACTION:

INACCURATE EMPLOYEE PAYROLL RECORDS

Labor Codes: LC § 1174 | 1174.5

Pursuant to labor codes §§ 1174 and 1174.5, the Plaintiff seeks civil penalties to hold the Defendant accountable for **failing to maintain true and accurate payroll records**. Based on evidence, information and belief, the Plaintiff alleges that the Defendant’s knowingly allows its Human Resources and Payroll Staff to misuse and circumvent its internal payroll systems (PeopleSoft Payroll and Centricity Time & Attendance) to make erroneous, retaliatory backend changes to employees’ payroll records. The Plaintiff alleges that the Defendant’s payroll practices and unlawful and noncompliant to wage & hour laws, and do not follow any best practices.

These allegations are corroborated by the frequent of the resulting payroll errors and compounded wage & hour and labor code violations they cause. The Injunctive Relief section of this PAGA complaint requests mandates to help City of Hope permanently remediate these payroll issues and prevent future financial harm to its employees.

H. EIGHTH CAUSE OF ACTION:

UNCURED EQUAL PAY ACT VIOLATIONS

Labor Codes: LC § 1197.5 | SB642 | AB497 | SB497 | SB642

The state of California’s Equal Pay Act laws (Labor Code 1197.5) prohibits employers from paying employees less than employees of a different sex, race, or ethnicity for work that requires similar skill, effort, and responsibility, performed under similar working conditions. In doing so, they deprive aggrieved female employees of fair and equitable wages, which typically results in compounded wage & hour violations, such as unpaid, underpaid, and late paid wages, just as what occurred in the Plaintiff’s case. Pursuant to Labor Code 1197.5, based on information and belief, and the Plaintiff’s personal account, it is alleges that the **Defendant knowingly and willfully violate Equal Pay Act laws by failing to pay female employees within its Info Technology division equal pay for equal work.**

Willful Pay Equity and Equal Pay Act Violations

Based on information and belief and evidence in the Plaintiff’s case, the **Defendant knowingly and willfully violates state & federal Pay Equity laws as well as Labor Code § 1197.5 by failing to preemptively identify and promptly redress pay disparities within its Info Technology division on an annual basis.** Then upon the confirmation of existing Equal Pay Act violations, the Defendant **creates additional unnecessary procedural delays, adamantly refuses to fully cure Equal Pay Act violations** in accordance with Pay Equity laws & protocols, and defiantly **fails to reimburse aggrieved female employees all retroactive wages**, calculated interest, and other monetary compensation and reimbursements due to them. This PAGA complaints seeks injunctive relief to fully redress the Defendant’s unlawful Equal Pay Act violations retroactively and from henceforth.

Retaliation Against Aggrieved Female Employees & Whistleblowers

Base on information and belief, in addition to adamantly refusing to remit full backpay for all retroactive unpaid wages to aggrieved female employees, the Defendant’s Corporate Officers intentionally and habitually engages in unlawful, noncompliant HR practices that include, but may not be limited to, subjecting aggrieved female employees to incessant harassment and retaliation for engaging in protected activities involving inquiring about or reporting pay disparities, as well as taking retributive adverse actions against aggrieved females to silence, harass, penalize, and/or to create pretext to strategically plan their wrongful termination or constructive discharge.

Based on information and belief, the Defendant’s unlawful violations and retaliatory acts have intentionally caused permanent financial, professional and reputational harm to aggrieved current and past female employees that stunted their professional growth, damaged their careers and future job prospects, and inflicted severe emotional harm upon them. Pursuant to SB642, AB497, SB 497 and SB 642, which prohibits all such retaliation against aggrieved employees and internal whistleblowers who filed employment labor complaints, this PAGA complaint seeks all appropriate civil damages against the Defendant for their alleged systemic and repeated violation of anti-retaliation, anti-harassment, and whistleblower protection laws.

Equal Pay Act Violations Against the Plaintiff (Chandra Rodgers)

Evidence in the Plaintiff’s case shows how the Defendant grossly mishandled her Equal Pay Act complaint and adamantly refused to pay her all monies due to fully cure the Equal Pay Act violations and make the Plaintiff financially whole. by ignoring and dismissing her gender/pay discrimination complaints, delaying her pay equity adjustment and backpay for over 4 years, short paying her backpay by over \$44k, refusing to included calculated interest not intentionally misclassifying her first back payment as a Lump Sum Bonus in violation of IRS laws, refusing, and adamantly refusing to correct the payroll errors upon request. As a result, I received several more months of inaccurate wage statements.

Unpaid Wages and Unreimbursed Losses & Expenses

And pursuant to Labor Codes 203, 210, 215, 218.6 and 226.6, the Plaintiff also seeks wage reimbursements, civil penalties, punitive damages on behalf of herself and other aggrieved employees pursuant to the following labor codes:

- LC 203 **Waiting Time Penalties** - Civil penalties of up to 30 days’ pay for the nonpayment of wages and unused vacation pay.
- LC 210 **Late Wages** - \$100 to \$200 per employee per violation, plus 25% of withheld wages.
- LC 215 **Wage Theft** - Civil penalties for intentional, retaliatory withholding of earned wages.
- LC 218.6 **Interest on Unpaid Wages** - Interest on all due and unpaid wages at the rate set in Civil Code § 3289(b).
- LC 226.6 **Withheld Wages** - Up to \$1,000 fine and imprisonment for intentionally illegally withholding employee wages.

Penalties and Injunctive Relief for Uncured Equal Pay Act Violations:

Pursuant to SB642, AB497, SB 497 and SB 642, which prohibits gender pay discrimination, require company’s to strictly comply with Pay Equity laws, protects aggrieved females from whistleblower retaliation, and enhances and amends California Labor Codes 98.6, 1102.5 and 1197.5, this PAGA complaint seeks to impose appropriate statutory penalties on the Defendant for willfully violating Labor Code § 1197.5 and California Pay Equity and Equal Pay Act laws. It also seeks injunctive relief to require City of Hope to identify and fully compensate and reimburse all aggrieved current and past female employees their unpaid wages.

I. NINTH CAUSE OF ACTION:

WHISTLEBLOWER RETALIATION and HARASSMENT

Labor Codes: LC § 98 | 98.6 | 98.74 | 98.7 | 1102.5 | CA Government Code 12940

Labor Codes 98, 98.6, 98.74, 98.7, 1102.5, includes the enforcement of anti-retaliation laws including legal protections against whistleblower retaliation for employees who inquire about or report employment labor or wage & hour violations to the Labor Commissioner, plus civil penalties, issuances of citations, and all appropriate relief due. Pursuant to these labor codes, **the Plaintiff seeks civil penalties, citations, and all other available relief available to hold City of Hope accountable for allowing its leaders and employees to engage in relentless retaliation against aggrieved employees and internal whistleblowers for years, as did the Plaintiff.**

Whistleblower Retaliation Against Plaintiff:

Case in point, the Plaintiff alleges that the Defendant violated anti-retaliation, anti-harassment, and whistleblower protection laws after the Plaintiff filed internal whistleblower complaints to report numerous employment labor, wage & hour, health & safety, and cybersecurity violations at City of Hope California facilities. The Defendant’s Leaders ignored and dismissed all of her legitimate complaints and allowed them to fester into more critical problems (e.g., 2023 cyberattack), and compounded labor code violations—many of which are reported in this PAGA complaint. After the Plaintiff engaged in the protected activities, the Defendant grossly mishandled and overshared her whistleblower complaints with the named bad actors, failed to take corrective action, refused to offer her any whistleblower protections or accommodations, and subjected to her to years of incessant harassment and retaliation up to her wrongful termination

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Private Attorneys General Act (PAGA) Complaint
Chandra Rodgers vs. City of Hope Medical Center
Labor Code Violations caused by Illegal Payroll Practices and Erroneous, Retaliatory Payroll Adjustments
up to her wrongful termination.
Two Leaves of Absence:
Evidence shows that the Defendant’s Leaders adamantly refused to stop the unlawful misconduct against the Plaintiff, and even participated in the harassment and retaliation, intentionally inflicting emotional distress upon the Plaintiff. These factors caused the Plaintiff’s work environment to become so unbearably toxic, hostile, and unsafe that she had to take two leaves of absence in February and May 2025. for her own health and safety. and at her own expense (i.e., self-funded whistleblower protections/accommodations).
DEFENDANT WRONGFUL TERMINATED PLAINTIFF 3 TIMES:
The most egregious whistleblower retaliation and adverse action the Defendants Executive Leaders subjected the Plaintiff to were **three separate wrongful terminations in February, May, and June 2025.**
Case in point, the Plaintiff alleges that the Defendant subjected her to **two separate wrongful terminations in February and May 2025** (i.e., temporary firings). In doing so, the Defendant took the following unjust adverse actions:
* Disabled all of her employee user accounts
* Blocked her access to COH networks and software.
* Cancelled her Medical Insurance
* Illegally docked her wages
* Sent her threatening emails (i.e., from HR and IT Executives)
* Instructed the Help Desk not to assist her with any login or other technical issues.
* Applied retaliatory backend payroll adjustment that decreased her wages and accrued time-off balances.
* Remotely accessed her laptop to lock her out of it
* Eliminated another one of her job duties, leaving her with only 1 job duty
* Cancelled her pending office supply order
* Cancelled her company-mandated cellphone upgrade
* Reversed her last Personal Holiday, depriving her of 8 hours of wages
* and more
The first two temporary terminations ultimately culminated in the Plaintiff’s third and final wrongful termination on 6/2/2025, when she was left with no other internal options or recourse and finally succumbed to the well-orchestrated constructive dismissal.
Pursuant to Labor Codes 98.6, 98.74 and 98.7, the Plaintiff seeks all civil penalties and all other relief deemed appropriate by the LWDA to hold City of Hope responsible for their willful and repeated violations of anti-retaliation, anti-harassment, and whistleblower protection laws.

J. TENTH CAUSE OF ACTION:NONPAYMENT of INTEREST on BACKPAY and UNPAID WAGES
Labor Codes: LC § 218.6
Nonpayment of Interest on Backpay for EPA Violations
Pursuant to labor codes §§ 96, 98.1, 1194, 204, 210, 215, 218.6, 227.3 and 1197.5, the Plaintiff seeks PAGA remedies to redress the Defendant's failure to pay her calculated interest on over \$80k in backpay she received that was over 4 1/2 years delinquent due to COH's dismissals of her labor complaints and willful defiance of state & federal Pay Equity laws. The Defendant's failure to include calculated interest reelects COH's unlawful payroll practices likely a routine practice impacting all similarly situated employees. Thus, this PAGA complaint seeks to identify other aggrieved COH employees who received backpay without the inclusion of calculated interest.
Pursuant to labor codes §§ 96, 98.1, 1194, 204, 210, 215, 218.6, 227.3 and 1197.5, the Plaintiff alleges that, in violation of Labor Code 1197.5 regarding Equal Pay Act and Pay Equity laws, the Defendant willfully failed to identify or correct pay disparities within its Info Technology division in a timely manner.
Case in point, the Defendant took over 4 years to investigate the Plaintiff's valid labor complaint. Then upon confirming the existence of Equal Pay Act violations years later, the Defendant's HR Executives intentionally delayed remitting back payments for several more months. They also short paid the Plaintiff over \$44k, and allegedly gave her insufficient retroactive pay equity salary increases for her first three years of employment. The Defendant's willful negligence caused the Plaintiff to be deprived of the use of nearly \$100k of her earned wages for nearly 5 years.
Thus, this PAGA complaint seeks to hold City of Hope accountable for their failure to pay interest in accordance with Labor Code 218.6, and their willful nonadherence to Pay Equity laws and corrective protocols. The Plaintiff alleges that in failing to fully cure confirmed Equal Pay Act violations, the Defendant did not pay the Plaintiff calculate interest on the total backpay she received. This is one of many reasons why the Plaintiff was never made financially whole.
Request for Interest on Unpaid Wages
Pursuant to labor codes §§ 96, 98.1, 204, 210, 215 and 218.6, the Plaintiff alleges that, the Defendant applied additional erroneous backend payroll adjustments that wrongfully decreased 14.4 of her regular work hours and unlawfully docked \$1,279 of her earned wages in May 2025. As of May 2026, she is still owed reimbursement of the docked wages plus calculated interest. For which, this PAGA complaint seeks to hold the Defendant accountable to pay its employees all unpaid interest, and to mandate corrections to their HR and payroll practices to remediate root causes for unpaid and delinquent wages that require added interest payments.

VII.PRAYER FOR RELIEF
The Plaintiff prays for judgement for all available remedies under California Labor Code for herself and all aggrieved employees, including without limitation to all unpaid amounts, attorney's fees & costs, civil and statutory penalties, injunctive relief, which includes, but is not limited to, the following:
1. LC 203 Waiting Time Penalties - Civil penalties of up to 30 days’ pay for the nonpayment of wages and unused vacation pay.
2. LC 210 Late Wages - \$100 to \$200 per employee per violation, plus 25% of withheld wages.
3. LC 215 Wage Theft - Civil penalties for intentional, retaliatory withholding of earned wages.
4. LC 218.6 Interest on Unpaid Wages - Interest on all due and unpaid wages at the rate set in Civil Code § 3289(b).
5. LC 226(e) Wage Statement Violations - Damages or penalties of \$50 for the initial pay period in which a violation occurs, and \$100 for each subsequent pay period.
6. LC 226(h) Attorney's Fees & Costs - For wage statement violations.
7. LC 226.3 Inaccurate Payroll Records - Civil penalties for failure to maintain required payroll records or provide accurate wage statements.
8. LC 226.6 Withheld Wages - Up to \$1,000 fine and imprisonment for intentionally illegally withholding employee wages.
9. LC 558 Wage & Hour Violations - Penalties of \$50 for initial violations and \$100 for subsequent violations per underpaid employee per pay period.
10. LC 1174.5 Payroll Records - Failure to maintain accurate and complete payroll records.
11. LC 2699 PAGA Penalties - All civil penalties for labor law violations on behalf of the Plaintiff and other aggrieved employees.
12. OTHER All other relief and penalties deemed just and proper by the court.

VIII.INJUNCTIVE RELIEF
This PAGA lawsuit seeks injunctive relief pursuant to labor code 2699 and AB 2288 that includes, but is not limited to, the issuance of the following state mandates to City of Hope requiring them to:
1. Immediately cease and desist all unlawful payroll practices including retaliatory manual backend payroll adjustments.
2. Promptly conduct internal investigative audits to identify and promptly remediate all system and procedural root causes for payroll errors and labor code violations.
3. Conduct thorough Pay Equity Audits to identify and remediate pay disparities with in COH's Info Technology division, then fully compensate all aggrieved female employees.
4. Payroll Staff to begin properly using COH's enterprise payroll systems (PeopleSoft Payroll and Centricity Time & Attendance) in accordance with the software instructions to reduce or eliminate frequent payroll errors by fully utilizing built-in workflows, internal controls, payroll calculations, error validations, and automated system notifications.
5. Human Resources and Payroll departments to immediately bring their departmental payroll practices into full compliance with California wage & hour and Pay Equity laws.
6. Identify all COH employees, corporate officers, and acting agents who perpetrated labor code violations, then appropriately correct, discipline, and train/retrain them.
7. Reform or eliminate COH's backend payroll adjustment methods that are often erroneous, lack transparency, and circumvent COH's payroll systems. All of which are root causes for frequent payroll errors, wage & hour violations, unlawful changes to Employee Timesheets, mismanagement and wrongful depletion of employees' accrued time-off balances, the execution of retaliatory payroll deductions and the generation of numerous inaccurate wage statements.
8. Establish internal processes and procedures that would preemptively identify Equal Pay Act violations, accurately calculate required pay equity salary adjustments, and initiate prompt corrective back payments to aggrieved female employees in compliance with state & federal Pay Equity laws.
9. Notify employees about planned payroll adjustments in advance in writing before they are made, and include detailed explanations for the manual payroll changes.
10. Establish protocols to grant employees due process to discuss, challenge or correct manual payroll adjustments.
11. Properly and thoroughly disclose manual payroll adjustments on employee wage statements in the respective "ADJUSTMENTS" and "MESSAGES" sections.
12. Cease all harassment and retaliation against aggrieved employees who reported payroll errors or filed labor-related whistleblower complaints.
13. Take immediate corrective action to cure all PAGA violations and remit appropriate back payments to aggrieved male and female employees.
14. Notify all impacted aggrieved employees who were adversely impacted by the PAGA violations, and make them financially whole.
Respectfully submitted,
Chandra Rodgers, Pro Se Plaintiff