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June 3, 2026

Via Online Submission

California Labor and Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814

PAGAfilings@dir.ca.gov

<https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

Subject: *Jeffrey Jimenez v. Protection Law Group, LLP*

Dear PAGA Administrator,

My name is Jeffrey Jimenez (“I”, “me”, or “my”) and I am an attorney licensed to practice law in the State of California (California State Bar License No. 338228). I am a former employee of Protection Law Group, LLP (“PLG”).

I write this letter because I intend to seek civil penalties, attorneys’ fees, costs, and other available relief for PLG’s violations of the California Labor Code, which are recoverable under the Private Attorneys General Act (“PAGA”), California Labor Code §§ 2698, et seq. I intend to seek relief on behalf of myself, and other persons who were employed by PLG as either an exempt employee, or as a non-exempt employee, who received at least one wage statement during the relevant PAGA Period. The PAGA period is defined as starting from June 3, 2025 through the present.

I was employed by PLG as a non-exempt, hourly paid employee from approximately July 2016 to August 2016, approximately July 2017 to August 2017, and again from approximately February 2021 to August 2, 2021. From August 3, 2021 through approximately July 30, 2025, I was employed by PLG as an exempt employee, working as an Attorney.

During my employment with PLG as an Attorney, starting on August 3, 2021, I was paid \$80,000 as a base salary. Thereafter, I would receive modest raises upon the anniversary of the beginning of my employment as an Attorney. At some point after August 31, 2024, but

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prior to November 21, 2024, I was given a raise to \$134,000 per year as my base salary. I was typically required to work approximately five (5) days per week Monday through Friday. My work schedule fluctuated based on my caseload and on a variety of other factors. It was not uncommon that I would work late into the night and also work on the weekends.

As an Attorney, my job duties included, but were not limited to, drafting motions, reviewing and analyzing documents for the cases I was assigned to or was asked to review by my colleagues, legal research, communicating with clients, taking and defending depositions, attending hearings, and attending mediations.

Violations of California Labor Code §§ 226(a)-Non-Compliant Wage Statements.

California Labor Code Section 226(a) states, “An employer, semimonthly or at the time of each payment of wages, shall furnish to their employee, either as a detachable part of the check, draft, or voucher paying the employee’s wages, or separately if wages are paid by personal check or cash, an accurate itemized statement in writing showing (1) gross wages earned, (2) total hours worked by the employee, except as provided in subdivision (j), (3) the number of piece-rate units earned and any applicable piece rate if the employee is paid on a piece-rate basis, (4) all deductions, provided that all deductions made on written orders of the employee may be aggregated and shown as one item, (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 their social security number or an employee identification number other than a social security number, (8) **the name and address of the legal entity that is the employer** ...” See Cal. Lab. Code § 226(a).

An employee suffering injury as a result of a knowing and intentional failure by an employer to comply with subdivision (a) is entitled to recover the greater of all actual damages or fifty dollars (\$50) for the initial pay period in which a violation occurs and one hundred dollars (\$100) per employee for each violation in a subsequent pay period, not to exceed an aggregate penalty of four thousand dollars (\$4,000), and is entitled to an award of costs and reasonable attorney’s fees. See Cal. Lab. Code § 226(e)

An employee is deemed to suffer injury for purposes of this subdivision if the employer fails to provide a wage statement. See Cal. Lab. Code § 226(e)(2)(A).

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A “knowing and intentional failure” does not include an isolated and unintentional payroll error due to a clerical or inadvertent mistake. In reviewing compliance with this section, the factfinder may consider as a relevant factor whether the employer, prior to an alleged violation, has adopted and is in compliance with a set of policies, procedures, and practices that fully complies with CCP Section 226. See Cal. Lab. Code § 226(e)(3).

An employee may also bring an action for injunctive relief to ensure compliance and is entitled to an award of costs and reasonable attorneys’ fees. See Cal. Lab. Code § 226(h).

In addition, California Labor Code section 226.3 states that any employer who violates section 226(a) shall be subject to a civil penalty in the amount of \$250 per employee per violation in an initial citation and \$1,000 per employee for each violation in a subsequent citation, for which the employer fails to provide the employee a wage statement or fails to keep the required records pursuant to Section 226(a).

Here, PLG violated California Labor Code § 226 by failing to provide me with compliant wage statements correctly identifying the name and address of the legal entity in violation of California Labor Code Section 226(a)(8).

For instance, during my employment with PLG, PLG issued me paystubs identifying a legal entity named “Protection Law Group”. See screenshot below of the 2025 W-2 Transcript I received.

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W-2 Transcript

Disclaimer: This document was generated by TurboTax using data retrieved from your connected financial account. For informational purposes only - not an official tax form or statement issued by your financial institution.

Tax Year: 2025

Corrected:

Void:

a Employee's Social Security Number: [REDACTED]

b Employer Identification Number (EIN): [REDACTED]

Duplicate Information from Box 16

State: CA

Employer's state ID number: [REDACTED]

c Employer's Name, Address and Zip Code
Name Line 1: PROTECTION LAW GROUP
Name Line 2:
Address Line 1: 149 SHELDON ST
City: EL SEGUNDO
State: CA
Zip Code: 90245

During various periods of my employment with PLG, both as an hourly paid, non-exempt employee and as an exempt employee, PLG used the following addresses as their main offices and listed these addresses on paychecks and/or paystubs I would receive: "136 Main Street, Suite A, El Segundo, CA 90245"; "237 California Street, El Segundo, CA 90245"; and "149 Sheldon Street, El Segundo, CA 90245".

However, during my employment with PLG, PLG never used offices located at "3455 Ocean View Blvd., Suite 100, Glendale, CA 91208".

In approximately April 2026, I logged onto the California Secretary of State Website:

<https://bizfileonline.sos.ca.gov/search/business>

I clicked on the search bar on the webpage and typed "Protection Law Group" and ran a search for businesses registered to do business in the state of California. I received eight (8) hits; (1) Consumer Protection Law Group, Inc.; (2) Debtors Protection Law Group, Inc.; (3) Debtors Protection Group, LLC; (4) Home Protection Law Group, PC; (5) Lawcore Protection Group, Inc.; (6) Legal Protection Group, A Professional Law Corporation; (7) PDL Protection Law Group PC; and (8) Protection Law Group, A Professional Corporation.

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I searched through all eight (8) of these entities and I found the only one that slightly resembled PLG as listed on my W-2s and/or my paystubs was "Protection Law Group, A Professional Corporation", with the exception that "A Professional Corporation" was not listed on my W-2s or my paystubs. This also seemed like the potential legal entity that PLG was operating under the guise of since the Statement of Information filed by "Protection Law Group, A Professional Corporation" on May 6, 2014 listed Heather Davis ("Ms. Davis") as the Agent for Service of Process.

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank. 14. NAME OF AGENT FOR SERVICE OF PROCESS (Note: The person designated as the corporation's agent MUST have agreed to act in that capacity prior to the designation.) HEATHER DAVIS

Ms. Davis is a Partner of PLG along with Amir Nayebdadash ("Mr. Nayebdadash"). Both Ms. Davis and Mr. Nayebdadash are listed as attorneys licensed to practice law in the state of California on the California Attorney Bar Search website for a legal entity named Protection Law Group, LLP.

Attorney Profile

Heather Marie Davis [REDACTED]

License Status: Active

Address: Protection Law Group, LLP, 149 Sheldon St, El Segundo, CA 90245-3916

Phone: [REDACTED] | Fax: [REDACTED]

Email: [REDACTED] | Website: [REDACTED]

Attorney Profile

Amir Nayebdadash [REDACTED]

License Status: Active

Address: PROTECTION LAW GROUP, LLP, 149 Sheldon St, El Segundo, CA 90245-3916

Phone: [REDACTED] | Fax: [REDACTED]

Email: [REDACTED] | Website: [REDACTED]

[More about This Attorney](#) ▲

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However, per the Certificate of Dissolution filed on July 18, 2016 with the California Secretary of State website, "Protection Law Group, A Professional Corporation" was dissolved on approximately July 12, 2016.

 State of California Secretary of State 3310512 Domestic Stock Corporation Certificate of Dissolution	DISS STK	01355413 FILED <i>imc</i> Secretary of State State of California JUL 18 2016 <i>clw</i>
There is no fee for filing a Certificate of Dissolution.		This Space For Filing Use Only
IMPORTANT – Read instructions before completing this form.		
Corporate Name (Enter the name of the domestic stock corporation exactly as it is of record with the California Secretary of State.) 1. Name of corporation Protection Law Group, A Professional Corporation		

I then discovered that the California Secretary of State requires an individual to mail a form requesting documents filed for any Limited Liability Partnership registered in the state of California. For some reason, the California Secretary of State website does not allow the public to search for documents related to Limited Liability Partnerships registered in California. Accordingly, I completed the requested form and mailed it to the California Secretary of State on May 4, 2026. When I completed the form, I asked for all documents ever filed by PLG with the California Secretary of State.

Thereafter, I received a single document titled "Application to Register a Limited Liability Partnership (LLP)" that was filed on May 3, 2013. The document lists, "3455 Ocean View Blvd., Suite 100, Glendale, CA 91208" as PLG's address. This document also lists Eric Boyajian as PLG's agent for service of process ("Agent"). This document also has the Agent's address as 3455 Ocean View Blvd., Suite 100 Glendale, CA 91208.

However, during my employment with PLG, PLG never used "3455 Ocean View Blvd., Suite 100, Glendale, CA 91208" as its office.

So on May 14, 2026, I went to the address "3455 Ocean View Blvd., Suite 100, Glendale, CA 91208" to see if it was possible a PLG office was operating out of the address listed with the California Secretary of State and to confirm if that is where I could find Mr. Boyajian to request my personnel file and time and payroll records from PLG. However, the office located at "3455 Ocean View Blvd., Suite 100, Glendale, CA 91208" was not being used by PLG. Instead, the address "3455 Ocean View Blvd., Suite 100, Glendale, CA 91208" was being used by other

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businesses named Techzone Networks, Wiedmann Bros. Angelica Stone C. Ht., Hospice of
Pristine Care, Inc., JLP Design Studio, and Open Arms Home Car, Inc.

See photos below showing the businesses other than PLG using the address “3455 Ocean View
Blvd., Suite 100, Glendale CA 91208.



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The next day, I called the California Secretary of state website and I asked them to verify if there was a mistake and if there were any additional documents showing PLG's current agent for service of process and the address for PLG's current agent for service of process. Since PLG is an employment law firm that sues employers for Labor Code 226 violations, I originally thought this was a mistake. Especially since PLG's website represents itself to be a Limited Liability Group. See screenshots and link below.

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https://www.protectionlawgroup.com/en/



Who We Are

Protection Law Group, LLP (PLG) is a trusted California-based law firm dedicated to empowering employees and protecting the injured. With over 60 years of combined experience, our attorneys are passionate advocates for justice, specializing in employment law and personal injury cases.

Rated by Super Lawyers
2019
2020
2021
2022
2023

Results Driven!

English

<https://www.protectionlawgroup.com/en/>

https://www.linkedin.com/company/protection-law-group-llp/about/

in I'm looking for...

Home My Network Jobs Messaging Notification



WE PROTECT YOU!

PROTECTION LAW GROUP, LLP

Law Practice · El Segundo, California · 535 followers · 11-50 employees

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<https://www.linkedin.com/company/protection-law-group-llp/about/>





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Overview

At Protection Law Group, LLP, our attorneys represent both employees whose workplace rights have been violated and individuals who have been injured due to the negligence of others. Our firm has a deep understanding of employment law, including the rights of employees and the duties employers owe to their workforce.

As former employment defense lawyers, our attorneys possess unique insight into how employers investigate, defend, and litigate claims. That perspective gives us a distinct advantage when prosecuting employment cases involving discrimination, retaliation, harassment, and wage and hour violations.

In addition to our employment practice, we also handle personal injury matters, advocating for clients who have suffered serious injuries and holding negligent parties accountable. We apply the same strategic, trial-focused approach across all cases to pursue the best possible outcomes for our clients.

Please contact Protection Law Group, LLP by calling (844) 294-3095 to schedule your free consultation.

Se Habla Español.

Website
<http://www.protectionlawgroup.com>

Phone
[\(844\) 294-3095](tel:(844)294-3095)

Industry
Law Practice

Company size
11-50 employees
20 associated members 

Headquarters
El Segundo, California

Founded
2013

Specialties

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Headquarters

El Segundo, California

Founded

2013

Specialties

Wage and Hour Law, Employment Discrimination and Harassment, Personal Injury, Catastrophic Injury, Workers' Compensation, Consumer and Products Liability, and Civil Rights Violations

Locations (1)

Primary

Main Office

149 Sheldon St, El Segundo, California 90245, US

[Get directions](#)



However, the agent from the California Secretary of state website I spoke to over the phone confirmed the only document PLG has ever filed with the California Secretary of State website is the Application to Register a Limited Liability Partnership that was filed on May 3, 2013. The agent I spoke to from the California Secretary of State also confirmed the closest legal entity registered to do business in California that resembles “Protection Law Group” was “Protection Law Group, A Professional Corporation”, but that corporation was dissolved on July 18, 2026.

Accordingly, I, and the other aggrieved employees are entitled to recover civil penalties, attorneys’ fees, costs, and interests thereon, and seek injunctive relief to bring PLG into compliance with California Labor Code Section 204, pursuant to Labor Code section 2699(a), (f), and (k).

Thank you.

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Sincerely,



Jeffrey Jimenez

Notice Provided to Employer via Certified Mail:

Protection Law Group, LLP
Attn: Amir Nayebdadash, Partner
149 Sheldon Street
El Segundo, CA 90245

Notice Provided to Employer via Certified Mail:

Protection Law Group, LLP
Attn: Heather Davis, Partner
149 Sheldon Street
El Segundo, CA 90245

Notice Provided to Employer via Certified Mail:

Protection Law Group, LLP
Attn: Eric Boyajian, Partner
149 Sheldon Street
El Segundo, CA 90245

Notice Provided to Employer via Certified Mail:

Protection Law Group, LLP
Attn: Eric Boyajian, Partner
330 N. Brand Blvd., Suite 1250
Glendale, CA 91203-4420

Notice Provided to Employer via Certified Mail:

Protection Law Group, LLP
Attn: Agent for Service of Process, Eric Boyajian
3455 Ocean View Blvd., Suite 100
Glendale, CA 91208

Notice Provided to Employer via Certified Mail:

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