July 20, 2026

ELECTRONICALLY FILED

Attn: PAGA Administrator
Labor and Workforce Development
Agency 1515 Clay Street, Suite 801
Oakland, California 94612
PAGAfilings@dir.ca.gov

Re: **Private Attorneys General Act of 2004 Notice**

Employee: **Dominique Whitfield and Aggrieved Employees**

Employer: **Dollar Tree Stores, Inc.**

To Whom It May Concern:

We represent Dominique Whitfield, a former employee of Dollar Tree Stores, Inc. ("Dollar Tree" or "Employer"). We intend to file a complaint against Dollar Tree on behalf of our client and all employees who have worked as salaried Store Managers for Dollar Tree in California. Pursuant to California Labor Code § 2699.3, we hereby provide notice of our client's intent to bring Private Attorneys General Act ("PAGA") claims under California Labor Code § 2699(a) and (f).

Ms. Whitfield and the alleged aggrieved employees are current and former similarly situated, salaried Store Managers for Dollar Tree in California. Ms. Whitfield intends to file a complaint on behalf of Dollar Tree's store managers, who have been misclassified as exempt employees, and therefore have been denied payment of all wages as well as meal periods and rest periods. Accordingly, Ms. Whitfield intends to pursue civil penalties in response to Dollar Tree's violations of the following Labor Code provisions:

- California Labor Codes §§ 200, 204, 1194, and 1198 (failure to pay for all hours worked),
- §§ 1182.11, 1182.12, 1194, and 1197 (failure to pay minimum wages),
- §§ 510 and 1194 (failure to pay overtime wages),
- § § 226.7 and 512 (failure to provide compliant meal and rest periods),
- §§ 226 and 226.3 (failure to provide timely and compliant itemized wage statements),
- §§ 201-203, 225.5 and 256 (failure to timely pay all wages owed during employment and following separation from employment),
- § 2802 (failure to reimburse for necessary business expenditures), and
- Cal. Lab. Code §§ 226, 1198.5, 432.5 (failure to produce personnel and payroll records).

Ms. Whitfield intends to state causes of action pursuant to California Labor Code § 2699(a) and (f) for civil penalties for violations of the various California Labor Code provisions enumerated above. Pursuant to Section 2699(a), Ms. Whitfield will seek civil penalties pursuant to each provision of the Code that provides for a civil penalty to be assessed and collected by the Labor and Workforce Development Agency or any of its departments, divisions, commissions, boards, agencies, or employees, including but not limited to those Labor Code provisions referenced above, as well as Sections 225.5, 226.3, and 256 of the California Labor Code. To the extent a provision of the Labor Code does not provide for a civil penalty, Ms. Whitfield will seek civil penalties pursuant to California Labor Code Section 2699(f). Dollar Tree, at all relevant times, was an employer who violated the rights of Ms. Whitfield and other aggrieved employees by violating various sections of the California Labor Code as outlined in this letter.

Ms. Whitfield worked at Dollar Tree from 2012 until approximately August 2026. While Ms. Whitfield started as an hourly employee, Dollar Tree promoted her to an exempt Store Manager position in approximately 2020. Throughout her time with Dollar Tree, Ms. Whitfield worked at locations throughout Sacramento, the Bay Area, and Reno. Ms. Whitfield's annual salary was approximately $72,000. Ms. Whitfield regularly worked well in excess of forty hours per week, commonly working between seventy and ninety hours weekly. During the holiday period from approximately October until January, Ms. Whitfield was subject to mandatory six-day, ten-hour-per-day scheduling requirements, resulting in a minimum of sixty hours per week. On several occasions during her tenure, Ms. Whitfield worked more than 30 days in a row, sometimes working up to 60 or more consecutive days. She did not clock in or clock out for her shifts.

Dollar Tree misclassified Ms. Whitfield and the alleged aggrieved employees as salaried executives, when these employees spent the majority of their time performing the tasks of hourly employees. Ms. Whitfield and the alleged aggrieved employees spent the majority of their time performing non-exempt manual labor, including cashiering, stocking shelves, unloading freight, cleaning, covering staffing shortages, and performing duties identical to those performed by hourly employees. She was expected to be onsite and filling in wherever was needed, which frequently occurred due to staffing issues. Therefore, Ms. Whitfield and the alleged aggrieved employees spent well in excess of 50 percent of their daily time performing hourly tasks.

To the extent that Ms. Whitfield and the alleged aggrieved employees made managerial decisions, their discretion and independent judgment were limited at every turn: hiring, discipline, and termination decisions required approval from district management or human resources, and labor hours were strictly controlled through centralized payroll allocations set by the District Manager that routinely left stores understaffed. Given Management's control and the extent to which Dollar Tree's policies and procedures dictated management decisions, Ms. Whitfield and the alleged aggrieved employees exercised little to no discretion and independent judgment.

As a result of these policies and practices, Dollar Tree misclassified Ms. Whitfield and the alleged aggrieved employees as exempt executives, when they were actually hourly employees under the law. These workers experienced a host of resultant wage and hour violations. First, Ms. Whitfield and the alleged aggrieved employees were not paid for all hours worked, as Dollar Tree did not track their time and they worked far more than their scheduled hours, including nights and on weekends. Ms. Whitfield and the alleged aggrieved employees also experienced overtime violations as they were not paid any overtime pay at all, even though they worked well more than eight hours per day and 40 hours per week.

Ms. Whitfield and the alleged aggrieved employees also endured meal and rest period violations. Because stores frequently operated with only one manager present and chronically insufficient staffing levels, Ms. Whitfield was unable to take compliant thirty-minute off-duty meal periods within the first five hours of work. As a result of these issues, Ms. Whitfield and the alleged aggrieved employees were unable to take full, timely, legally compliant meal and rest breaks. Dollar Tree did not pay them the required premium pay for missed meal and rest periods.

Dollar Tree also denied Ms. Whitfield and aggrieved employees proper reimbursement for business expenditures. Dollar Tree required Ms. Whitfield and similarly situated employees, including hourly Assistant Managers, to use their personal cellular telephones for mandatory and extensive business purposes without reimbursement. Ms. Whitfield was required to submit hundreds of photographs each week pursuant to a mandatory weekly photography schedule directed by her District Manager: impulse and “red zone” areas on Mondays; Multi-Price sections and Dollar Tree Plus aisles on Tuesdays; backroom conditions before and after truck deliveries, and cashier productivity reports on Wednesdays; party aisles and end cap displays on Thursdays; and freezer sections on Sundays, Wednesdays, and Fridays. Ms. Whitfield was also required to use her personal cell phone for theft documentation, accident reporting, communications with district management via personal and group text messages, scheduling coordination, and incident reporting throughout each week. These obligations generated substantial and ongoing data usage, call volume, and wear on Ms. Whitfield’s personal device. Dollar Tree provided no reimbursement for these expenses, thereby unlawfully shifting the cost of conducting business onto its employees in violation of Labor Code section 2802.

On May 4, 2026, pursuant to Cal. Lab. Code §§ 226, 1198.5, 432.5, Ms. Whitfield sent Dollar Tree a written request for production of her personnel file and payroll records via certified mail. Dollar Tree did not respond to Ms. Whitfield’s written request, did not seek an extension of time to respond, and failed to produce the requisite records within the respective 30-day and 21-day time limits.

Ms. Whitfield and the alleged aggrieved employees experienced a number of derivative issues from these wage and hour practices, including, but not limited to, receiving incorrect wage statements and not receiving all pay owed to them at the end of their employment. Compensation for off-the-clock work, overtime, premium pay for missed breaks, and business expenses remained outstanding after termination of the employment relationship.

…

Plaintiff is represented by Schneider Wallace Cottrell Kim LLP ("SWCK"), a law firm based in Emeryville, California. SWCK has extensive experience in the successful litigation and resolution of employment and representative actions nationwide. A description of the work, mission, and credentials of the firm can be found at www.schneiderwallace.com. Plaintiff and SWCK are committed to zealously pursuing redress on behalf of the State of California and all other Aggrieved Employees for the violations set forth above.

Very Truly Yours,

SCHNEIDER WALLACE COTTRELL KIM LLP

Carolyn H. Cottrell
Attorney at Law

cc via U.S.P.S. Certified Mail with Return Receipt Requested

Dollar Tree Stores, Inc.
c/o Agent for Service of Process:
CSC - Lawyers Incorporating Service
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA 95833
Registered agent for Dollar Tree Stores, Inc.