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Attorney for Plaintiff
Maria Alvarez

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

MARIA ALVAREZ, on behalf of herself and all aggrieved employees,	) NO. 25STCV08891
	)
Plaintiff,	) COMPLAINT FOR PAGA PENALTIES
	)
v.	)
	)
WELCOME GROUP MANAGEMENT, LLC,	)
and DOES 1 to 100,	)
	)
Defendants.	)

PRELIMINARY ALLEGATIONS

1. Plaintiff Maria Alvarez is a resident of Tulare County.
2. Defendant Welcome Group Management, LLC is a limited liability company based in Los Angeles County.
3. Plaintiff does not know the names and capacities of Does 1 to 100 and therefore use fictitious names. Plaintiff will amend pursuant to Code of Civil Procedure section 474 when the names and capacities are known.
4. The named and Doe defendants are referred to as "Defendants" and are the alter ego of each other, and are collectively liable for the acts below.
5. Defendants operate hotels including Marriott Visalia, Fairfield Inn Sacramento, Residence

1 Inn Sacramento, Courtyard Sacramento Cal Expo Riviera Resort Palm Springs, AC Hotel South
2 Bay, and Hyatt Place LAX.

3 6. Plaintiff worked at the Visalia location from March 2024 to April 2024. Hemet from
4 February 2024 forward as a nonexempt worker; thus Wage Order 5 applies.

5 7. On July 1, 2024 Plaintiff sent a PAGA letter to Defendant and uploaded the it to the LWDA
6 website. Since it has been more than 65 days since the letter was sent, Plaintiff may request PAGA
7 penalties on behalf of himself and all aggrieved employees. (See Lab. Code, § 2699(a).)

8
9 FIRST CAUSE OF ACTION

10 PAGA Penalties

11 Against All Defendants

12 8. Plaintiff incorporates by reference paragraphs 1 to 7 of the complaint.

13 9. The PAGA penalties for the minimum wage violations are in Labor Code 1197.1.

14 10. The PAGA penalties for the overtime violations are in Labor Code 558.

15 11. The PAGA penalties for the meal break violations are in Labor Code 558.

16 12. The PAGA penalties for the rest break violations are in Labor Code 2699.

17 13. The PAGA penalties for the wage statement violations are in Labor Code 226.3.

18 14. The PAGA penalties for the unreimbursed expenses violations are in Labor Code 2699.

19 15. Further, Plaintiff is entitled to attorney fees and costs pursuant to Labor Code 2699.

20 PRAYER

21 First Cause of Action

22 1. All applicable penalties

23 2. Attorney fees and costs

24 3. Other relief the court deems proper

25 Date: March 26, 2025

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26 /s/ Adam Rose

27 Attorney for Plaintiff
28 Maria Alvarez