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August 27, 2026

VIA CERTIFIED U.S. MAIL & RETURN RECEIPT REQUESTED

9589 0710 5270 3377 5674 25

Department of Industrial Relations
California Labor & Workforce Development Agency
800 Capitol Mall, Suite 5000
Sacramento, CA 95814
[Notice Filed Online via LWDA/PAGA Filing Portal]

Element Materials Technology Huntington Beach, LLC
15063 Bolsa Chica St.
Huntington Beach, CA 92649

Re: Jacob Purnell v. Element Materials Technology Huntington Beach, LLC
PRIVATE ATTORNEY GENERAL ACT ("PAGA") NOTICE

Dear PAGA Administrator:

My firm has been retained by Jacob Purnell ("Mr. Purnell") regarding his retaliation and wrongful termination action against his former employer, Element Materials Technology Huntington Beach, LLC ("Element"). I am writing this letter to the Labor & Workforce Development Agency ("LWDA") in order to exhaust Mr. Purnell's administrative remedies pursuant to *Labor Code* §§ 2699 *et seq.* and 2699.3.

Element employed Mr. Purnell from August 2024 through November 2025 as a Level 3 Radiographic Testing and Computed Radiography Expert. Mr. Purnell claims that Element, as his employer, retaliated against and wrongfully terminated him in violation of California *Labor Code* §§ 98.6 & 1102.5, at least in part, due to Mr. Purnell's reporting to Element the violation of relevant government testing standard, and unlawful conduct in the workplace.

Specifically, in or around February 2025, Mr. Purnell complained orally and in writing to Element's management that it was not properly calibrating and serializing equipment in compliance with standards set forth by the National Aerospace and Defense Contractors Accreditation Program ("NADCAP").

In or around April 2025, Mr. Purnell complained that Element improperly docked his vacation hours for days that he worked. Following his complaints, Mr. Purnell's supervisor began retaliating against him by forcing him to work longer hours, micromanaging his work, and making false claims about his performance to other employees. In or around September 2025,

Element further retaliated against Mr. Purnell by placing him on a performance improvement plan based on unfair criticisms of his performance.

In or around October 2025, Mr. Purnell complained again to Element's management about its compliance issues, this time escalating his complaints to upper management. On or around October 28, 2025, Element placed Mr. Purnell on administrative leave pending the outcome of an investigation into his claims. While on administrative leave, Element wrongfully terminated Mr. Purnell from his employment in retaliation for his complaints. Additionally, throughout his employment, Mr. Purnell complained of the racial discrimination that some employees were being forced to endure from management. Element did not heed or take action to remedy any of Mr. Purnell's complaints. Nor did it respect his right to resist such practices but instead retaliated against and wrongfully terminated Mr. Purnell's employment in retaliation for making such complaints and resisting Element's unlawful business practices.

As a result of these circumstances, Mr. Purnell is preparing to file a civil lawsuit with the Los Angeles Superior Court asserting civil claims including those for retaliation and wrongful termination as set forth by *Labor Code* §§ 98.6 & 1102.5, among other claims. The purpose of this letter is to learn whether the LWDA intends to investigate Mr. Purnell's allegations regarding Element's violations of *Labor Code* §§ 98.6 & 1102.5, and the potential civil penalties specified by *Labor Code* §§ 1102.5(f), 1103, and 2699 *et seq.*

Submitted concurrently with this letter is the required filing fee of \$75.00, per the PAGA requirements. Thank you for your assistance and cooperation in this matter. Should you have any questions, please contact me at (213) 382-2222.

Sincerely,

A handwritten signature in black ink, appearing to read "Randi P. Wise", with a stylized flourish at the end.

RANDI P. WISE, ESQ.

EMPLOYEE JUSTICE LEGAL GROUP

**PROOF OF SERVICE
STATE OF CALIFORNIA,
COUNTY OF LOS ANGELES**

I reside in the county of Los Angeles, State of California, I am over the age of eighteen and not a party to the within action; my business address 1001 Wilshire Blvd., Los Angeles, California 90017. On the date shown below, I served the foregoing document, described as:

1. Private Attorney General Act Notice.

On the intended parties by placing the true copies thereof in a sealed envelope addressed to:

Department of Industrial Relations
California Labor & Workforce Development Agency
800 Capitol Mall, Suite 5000
Sacramento, CA 95814
[Notice Filed Online via LWDA/PAGA Filing Portal]

Element Materials Technology Huntington Beach, LLC
15063 Bolsa Chica St.
Huntington Beach, CA 92649

I am “readily familiar” with the firm’s practices of collection and processing correspondence for mailing. Under that practice it would be deposited with the U. S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on the motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of the deposit for mailing an affidavit of service thereof.

Executed on August 27, 2026, in Los Angeles, California.

I declare under the penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Name: Arianna Romero

Signature: *Arianna Romero*