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LAUREL
EMPLOYMENT LAW

November 13, 2025

NOTICE VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Private Attorney General Act (PAGA) – Filing
Labor and Workforce Development Agency
1515 Clay Street, Suite 801
Oakland, California 94612
PAGAfilings@dir.ca.gov

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

Blackstone Consulting, Inc.
c/o Registered Agent: Registered Agent Solutions, Inc.
720 14th Street,
Sacramento, CA 95814

Re: Notice by Marcus T. Manuel on Behalf of Himself, the State of California, and all other Aggrieved California Employees of Blackstone Consulting, Inc. and Does 1-10, as an individual and a Representative of the State of California

Dear PAGA Administrator:

Pursuant to the Labor Code Private Attorneys General Act of 2004 ("PAGA"), Labor Code §§ 2698, *et seq*., Marcus T. Manuel ("Mr. Manuel" or "Claimant") intends to bring a civil action against Blackstone Consulting, Inc. ("Blackstone Consulting" or "the Employer") and Does 1-10, individually and on behalf of the State of California and all other Aggrieved Employees. This letter serves as Claimant's written notice pursuant to Labor Code § 2699.3(a)(1), providing the Labor and Workforce Development Agency ("LWDA") the opportunity to investigate the alleged claims contained herein of the specific provisions of the Labor Code allegedly violated by the Employer and the facts and theories in support of said allegations. The information contained herein is based on the currently available information and belief.

If the LWDA does not intend to investigate the alleged violations, Claimant intends to file a representative civil action for PAGA penalties on behalf of himself and all other Aggrieved Employees of the Employer and shall seek civil penalties under the PAGA. A copy of this Notice is being sent to the Employer by certified mail at the address above.

Identity of "Employees"

Claimant intends to pursue PAGA civil penalties on their own behalf, on behalf of the State of California, and on behalf of other current and former employees of the entities/individuals referenced below who performed non-exempt work for said entities/individuals and were either: 1) classified as a non-exempt employee or 2) should have been classified as a non-exempt employee. Said employees are limited to employees performing work for said entities/individuals at any time during the relevant period. The said employees are collectively referred to hereinafter as "Aggrieved Employees." The names of Aggrieved Employees (other than Claimant) are contained within the personnel records of the Employer.

Identity and Capacity of Employers/Joint Employers

Claimant intends to pursue a PAGA action against the Employer and its parent companies, subsidiaries, successors, owners, officers, directors, and managing agents (collectively referred to as "Employer" as well). Claimant will seek to hold all owners, directors, officers, and managing agents of the Employer, personally liable for said violations to the extent permitted under Labor Code § 558 and/or Labor Code § 558.1.

All business entities referenced herein were the alter-egos of each and every other entity and individual referenced herein. There exists, and at all times herein mentioned has existed, a unity of interest and ownership between said entities and individuals such that any separateness between them ceased to exist in that said individuals and other entities have completely controlled, dominated, managed, and operated the business entities and have intermingled the assets of each to suit convenience. Furthermore, each of the business entities was, and at all times mentioned herein, a mere shell, an instrumentality, and a conduit through which the other above-referenced entities/individuals carried out their business, exercising complete control and dominance over the business such that individuality or separateness did not truly exist. Therefore, in the PAGA action, Claimant will seek to hold each said individual and/or entity jointly and severally liable for any and/or all violations committed by the other above-referenced individuals and/or entities.

It should further be noted that the Employer and its parent companies, subsidiaries, successors, owners, officers, directors, and/or managing agents have been engaged in a joint enterprise. Moreover, said persons/individuals are joint employers of Aggrieved Employees for the following reasons: 1) Said entities/individuals directly and/or indirectly exercised control over the wages, hours or working conditions of Aggrieved Employees; 2) Said entities/individuals had knowledge (either personally or through officers, directors and/or managing agents) of the work Aggrieved Employees were doing for them while supposedly being employed by another entity/individual and failed to prevent the work from occurring; and 3) Said entities retained or assumed a general right of control over hiring, direction, supervision, discipline, discharge, and relevant day-to-day aspects of the workplace behavior of Aggrieved Employees.

Violations/Supporting Facts and Theories

The Employer is based in Los Angeles, Los Angeles County, California.

At all times herein, the Employer operates a private security company in Los Angeles County, California. The Employer provides armed and unarmed security services. The Employer operates within the State of California and has employed/jointly employed Employees (including Claimant) to perform work and services in furtherance of its business and joint enterprise interests.

Claimant has worked for the Employer from June 2024 to the present as an Armed Protection Officer (APO). During Claimant's employment, Claimant was frequently unable to receive proper overtime and double-time wages, obtain reimbursement for business mileage expenses, and receive accurate wage statements due to a faulty timekeeping system.

At all relevant times, at least one year prior to the date of this Notice, the Employer subjected Claimant and other Aggrieved Employees to policies and practices that caused violations of the Labor Code as described herein. Claimant now seeks civil penalties on behalf of all Aggrieved Employees and the State of California, based on alleged violations of the Labor Code and applicable IWC Wage Order(s), including civil penalties pursuant to Labor Code § 558(a). Claimant's claims are set forth in further detail below.

For reasons set forth herein, Claimant alleges the following violations of the Labor Code and applicable IWC Wage Order on behalf of himself and all other non-exempt Aggrieved Employees of Employer:

1. Failure to Provide Meal Periods (Lab. Code § 512)
2. Failure to Provide Rest Periods (Lab. Code § 226.7)
3. Failure to Pay Overtime Wages (Lab. Code §§ 510, 1194)
4. Failure to Reimburse Business Expenses (Lab. Code § 2802)
5. Invalid Waiver of Wage and Hour Rights (Lab. Code § 432.5)
6. Failure to Pay All Wages Owed (Lab. Code § 204)
7. Failure to Maintain Payroll Records (Lab. Code §§ 1174, 1174.5)
8. Failure to Provide Accurate Itemized Wage Statements (Lab. Code § 226(a))
9. Failure to Provide Wage-Statement Records Upon Request (Lab. Code § 226(b)(c))

The violations of the Employer, thus, include the following:

Failure to Provide Meal Periods (Lab. Code § 512)

Labor Code § 512 and the applicable IWC Wage Order impose a non-waivable duty on the Employer to provide timely, uninterrupted meal periods of at least thirty minutes for qualifying shifts and to ensure that employees are relieved of all duty during such periods. This obligation prohibits policies or practices that deny, delay, interrupt, or discourage meal breaks in violation of statutory or IWC requirements. Claimant asserts this Cause of Action solely for civil penalties under PAGA, as provided by Labor Code § 2699(a), on a representative basis and subject to all prefiling steps outlined in Labor Code § 2699.3.

Claimant and Aggrieved Employees routinely worked shifts that required meal breaks, yet the Employer failed to consistently provide timely, uninterrupted thirty-minute meal periods free from work duties. The Employer implemented scheduling and staffing practices that caused

Claimant and Aggrieved Employees to remain on duty or to have their meal periods delayed, interrupted, or shortened, often due to inadequate coverage and chronic understaffing. The Employer further required Claimant and Aggrieved Employees to sign documents about break pay, which confirms the Employer's knowledge of prior violations.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Provide Rest Periods (Lab. Code § 226.7)

Labor Code § 226.7 and the applicable IWC Wage Order impose a non-waivable duty on the Employer to authorize and permit all employees to take compliant rest periods, free of work obligations, as required by law for every four hours or significant fraction thereof worked. The Employer must not require, encourage, or allow employees to skip or shorten rest periods, and is prohibited from adopting or maintaining any policy, practice, or system that fails to ensure the provision of legally compliant rest breaks. Claimant brings this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to the prefiling requirements set forth in Labor Code § 2699.3.

Claimant and Aggrieved Employees frequently could not take uninterrupted ten-minute rest periods for every four hours worked because the Employer did not provide adequate staffing or coverage to permit these breaks. The Employer's scheduling practices and operational requirements resulted in Claimant and Aggrieved Employees working through rest periods or taking them late. The Employer's requirement that employees sign forms concerning break pay indicates the Employer's awareness and acknowledgment of these violations.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Pay Overtime Wages (Lab. Code §§ 510, 1194)

Labor Code § 510 and Labor Code § 1194, together with the applicable IWC Wage Order, impose a non-waivable duty on the Employer to pay overtime compensation at the required premium rates for all hours worked beyond eight hours in a day, forty hours in a week, or as otherwise mandated. This obligation ensures employees receive proper compensation for all overtime worked and prohibits policies or practices that result in unpaid or underpaid overtime. Claimant asserts this Cause of Action solely for civil penalties under PAGA, as provided by Labor Code § 2699(a), on a representative basis and subject to the prefiling steps in Labor Code § 2699.3.

Claimant and Aggrieved Employees regularly worked more than eight hours in a day and over forty hours in a week, but the Employer failed to pay the required overtime and double-time premium rates for all such hours. The Employer's payroll system did not accurately track or compensate all overtime worked, and employees were required to manually track hours due to acknowledged faults in the Employer's electronic timekeeping system. As a result, Claimant and Aggrieved Employees did not receive all the premium pay owed for overtime and double-time hours.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Reimburse Business Expenses (Lab. Code § 2802)

Labor Code § 2802 and the applicable IWC Wage Order impose a non-waivable duty on the Employer to reimburse employees for all necessary expenditures or losses incurred in direct consequence of performing their job duties or obeying Employer directions. This duty prohibits any policy or practice that shifts the cost of business-related expenses to employees or denies reimbursement for tools, equipment, mileage, supplies, or other job-required outlays. Claimant brings this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to the prefiling steps outlined in Labor Code § 2699.3.

Claimant and Aggrieved Employees incurred necessary business expenses, such as travel costs and mileage, when required to travel between locations or perform work-related duties; however, the Employer failed to reimburse these expenses. The Employer was aware of these expenses, as employees had made repeated requests and were promised reimbursement systems that were never implemented. The Employer's failure to provide mileage reimbursement caused Claimant and Aggrieved Employees to bear costs that the Employer should have covered.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Invalid Waiver of Wage and Hour Rights (Lab. Code § 432.5)

Labor Code § 432.5 and any applicable IWC Wage Order impose a non-waivable duty on the Employer not to require employees or applicants to agree in writing to terms or conditions that the Employer knows are prohibited by law, including waivers of statutory wage and hour rights. This duty prohibits the Employer from enforcing, maintaining, or using any policy, contract, release, or agreement that seeks to waive, restrict, or limit rights or remedies provided under the Labor Code or an IWC Wage Order. Claimant brings this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to all prefiling steps outlined in Labor Code § 2699.3.

The Employer required Claimant and Aggrieved Employees to sign documents or forms related to breaks and wage issues that attempted to restrict or waive their statutory rights. The Employer knowingly presented these documents despite non-compliant practices, suggesting an effort to limit liability or improperly seek a waiver of wage and hour protections. This conduct demonstrates the Employer's intent to enforce or maintain policies that unlawfully restricted rights under wage and hour laws.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Pay All Wages Owed (Lab. Code § 204)

Labor Code § 204 imposes a non-waivable duty on the Employer to pay all earned wages, including commissions and incentive compensation, no less frequently than semimonthly or on other lawfully designated paydays, as established by the statute and any applicable IWC Wage Order. This requirement ensures employees receive timely payment for all hours worked in compliance with statutory deadlines and wage orders. Claimant brings this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to the prefiling steps outlined in Labor Code § 2699.3.

Claimant and Aggrieved Employees did not receive all wages earned within the required pay periods due to the employer's failure to calculate and pay for all hours properly worked, including overtime and double time. Faults in the timekeeping and payroll process resulted in late, incomplete, or inaccurate wage payments, forcing employees to track their hours manually. As a result, the Employer failed to ensure that Claimant and Aggrieved Employees received all earned compensation on regularly scheduled paydays.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Maintain Payroll Records (Lab. Code §§ 1174, 1174.5)

Labor Code § 1174 and Labor Code § 1174.5, as well as the applicable IWC Wage Order, impose a non-waivable duty on the Employer to accurately keep, maintain, and preserve complete payroll records showing hours worked, wages paid, and other required data for each employee for a period of at least three years. This duty includes ensuring that such records are available for inspection and copying by employees and state officials upon request. Any policy or practice that causes records to be missing, incomplete, inaccurate, or not produced as required constitutes a violation of this policy. Claimant brings this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to the prefiling steps set forth in Labor Code § 2699.3.

Claimant and Aggrieved Employees were subject to a payroll system that frequently malfunctioned and required manual entries, resulting in incomplete or inaccurate records of hours worked and wages paid. The Employer acknowledged the defects in its electronic timekeeping system but did not correct the underlying issues or consistently maintain accurate payroll records for inspection or review. This failure impeded Claimant and Aggrieved Employees' ability to verify wages and ensure compliance with recordkeeping requirements.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Provide Accurate Itemized Wage Statements (Lab. Code § 226(a))

Labor Code § 226(a) and the applicable IWC Wage Order impose a non-waivable duty on the Employer to furnish each employee with accurate, itemized wage statements that set forth all required information, including hours worked, wages earned, pay periods, deductions, and employer identification details. The Employer must not adopt any policy or practice that results in missing, incomplete, or inaccurate wage statements, or otherwise frustrates employees' ability to verify and understand their compensation. Claimant asserts this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to all prefiling steps outlined in Labor Code § 2699.3.

Claimant and Aggrieved Employees received wage statements that were inaccurate or incomplete because the Employer failed to list all hours worked, premium pay earned, and other required details. The faulty timekeeping system resulted in wage statements that did not accurately reflect actual hours or correct compensation, causing confusion and impairing the ability of Claimant and Aggrieved Employees to confirm payment. The Employer's ongoing payroll errors resulted in repeated delivery of deficient wage statements.

This Cause of Action seeks civil penalties on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Failure to Provide Wage-Statement Records Upon Request (Lab. Code § 226(b)(c))

Labor Code § 226(b) and Labor Code § 226(c), as well as the applicable IWC Wage Order, impose a non-waivable duty on the Employer to permit employees to inspect or copy their wage statements upon request within the statutory timeframes. This obligation requires the Employer to maintain a process for responding to such requests promptly. It prohibits any policy or practice that results in the delay or denial of access to these records, as regulated by Labor Code § 226(b) and Labor Code § 226(c). Claimant brings this Cause of Action solely for civil penalties under PAGA, as authorized by Labor Code § 2699(a), on a representative basis and subject to the prefiling requirements outlined in Labor Code § 2699.3.

Claimant and Aggrieved Employees requested access to their wage statements and payroll records to verify pay and resolve discrepancies, but did not always receive timely or complete copies. The Employer lacked an effective process to fulfill these requests promptly and failed to provide accurate wage records as required. As a result, Claimant and Aggrieved Employees were denied the information needed to confirm wages and enforce their rights.

This Cause of Action seeks civil penalties only on a representative basis. The Employer and any joint employers or agents are responsible if they set, knew of, controlled, or failed to correct the challenged policies or practices, and this section does not seek unpaid wages, waiting-time penalties, or other damages, which are reserved for non-PAGA claims.

Accordingly, Claimant now seeks civil penalties pursuant to the PAGA on behalf of all Aggrieved Employees based on the alleged violations of the Labor Code and applicable IWC Wage Orders.

Attorneys' Fees, Costs, Interest, and Penalties

Labor Code §§ 218.6, 226(e), 1194, 1194.2, and 2699, *et seq*., give employees the right to recover in a civil action the unpaid balance of the full amount of minimum wages, regular wages, overtime compensation, damages, liquidated damages, and penalties, including interest thereon, reasonable attorney's fees, and costs of suit.

Pursuant to Labor Code § 2699(m), Aggrieved Employees are entitled to collect 35% of the civil penalty assessment. Accordingly, Employers are liable for these items in addition to the unpaid wages. Claimant has already incurred actual damages, costs, and attorney's fees and will continue to incur costs because of the Employer's unlawful actions.

Conclusion

If the State of California intends to investigate the matters set forth herein, please notify our offices as soon as possible, as prompt administrative action will enable the unlawful identified practices to be rectified in a timely manner. If the State of California does not send notification of its intent to investigate the alleged violations set forth herein, then pursuant to Labor Code §§ 2698, *et seq*. (PAGA), Claimant reserves the right to file a PAGA cause of action seeking all available damages, penalties, and remedies as well as attorneys' fees, interest, and costs against Employer, as permitted under the PAGA. Should the State of California require any additional information, please do not hesitate to contact the undersigned.

Sincerely,

Laurel Employment Law APC

Erin Cole

Erin C. Cole, Esq.
erin@laurelemploymentlaw.com