

**JCL LAW FIRM, APC**

Jean-Claude Lapuyade (State Bar #248676)

[jlapuyade@jcl-lawfirm.com](mailto:jlapuyade@jcl-lawfirm.com)

Sydney Castillo Johnson (State Bar #343881)

[scastillo@jcl-lawfirm.com](mailto:scastillo@jcl-lawfirm.com)

John L. Nitti (State Bar #330752)

[jnitti@jcl-lawfirm.com](mailto:jnitti@jcl-lawfirm.com)

Carolina Faccin (State Bar \$340855)

[cfaccin@jcl-lawfirm.com](mailto:cfaccin@jcl-lawfirm.com)

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

**ZAKAY LAW GROUP, APLC**

Shani O. Zakay (State Bar #277924)

[shani@zakaylaw.com](mailto:shani@zakaylaw.com)

Jaclyn Joyce (State Bar #285124)

[jaclyn@zakaylaw.com](mailto:jaclyn@zakaylaw.com)

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 255-9047

Attorneys for PLAINTIFFS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN BERNARDINO**

ALSHA JACKSON, an individual,  
FRANCISCO CARRILLO GONZALEZ, an  
individual, on behalf of themselves, and on  
behalf of all persons similarly situated,

Plaintiffs,

v.

AC PRO INC., a California corporation; and  
DOES 1-50, Inclusive,

Defendants

Case No: CIVSB2407673

**DECLARATION OF ALSHA JACKSON IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
AND PAGA ACTION SETTLEMENT**

Date: November 6, 2025

Time: 8:30 a.m.

Judge: Hon. Jeffrey R. Erickson

Dept.: S14

1 I, Alsha Jackson, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently  
3 testify to the following facts from my own personal knowledge. I am the lead named Plaintiff in the  
4 above wage and hour class action filed against AC PRO INC., a California corporation (“Defendant”).

5 2. This declaration is being submitted in support of Plaintiff’s motion for Preliminary  
6 Approval of Class and PAGA Action Settlement.

7 3. I believe that I am, have been and will continue to represent the interests of the class  
8 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking  
9 to represent.

10 4. I worked for Defendants as a non-exempt employee, paid on an hourly basis in addition  
11 to non-discretionary bonuses, in San Diego, California between January of 2023 to July of 2023. At  
12 all times during my employment, I was paid on an hourly basis in addition to earning non-discretionary  
13 bonuses and was entitled to legally compliant meal and/or rest periods, and minimum, regular and  
14 overtime wages for all hours worked. Throughout my employment, I was subject to Defendant’s  
15 written policies and procedures contained in, among other documents, the “Associate Handbook.”

16 5. Generally, my lawsuit claims that Defendant failed to pay for all hours worked, failed  
17 to include non-discretionary bonuses into the regular rate of pay for the purposes of sick pay, failed to  
18 provide meal breaks and rest breaks, and failed to reimburse employees for mandatory business  
19 expenses.

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking  
21 to represent because I was subject to the same alleged unlawful employment policies and practices at  
22 issue in this action, including but not limited to, Defendants’ failure to pay for all hours worked, failure  
23 to include non-discretionary bonuses into the regular rate of pay for the purposes of sick pay failure to  
24 provide meal breaks and rest breaks, and failure to reimburse employees for mandatory business  
25 expenses. Factually, Defendant’s policies and practices apply class wide, and Defendant’s liability can  
26 be determined by facts common to all members of the Class.

27 ///

1           7. Further, there is no conflict between my interests and the interests of the class that I am  
2 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that  
3 I was injured by the same company-wide policies and practices to which the proposed Class was  
4 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests  
5 of the Class by initiating this litigation, undertaking extensive class document evaluation, and  
6 evaluating the proposed settlement to assure that it is fair.

7           8. I understood at the time that I filed this action, that as a Class Representative, I owed a  
8 duty to the putative class members to faithfully prosecute this action with their best interests at the  
9 forefront of every decision. I understood that I could not make any decision in this action for the sole  
10 benefit of my personal interest. I understood that in executing this duty, I might have been asked to  
11 sacrifice my personal best interests for the benefit of the interests of the putative class members.  
12 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible  
13 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour  
14 practices. I believe that I faithfully executed the duties of a Class Representative throughout this  
15 litigation and will continue to do until this litigation is fully and finally resolved.

16           9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,  
17 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and  
18 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

19           I declare under the penalty of perjury under the laws of the State of California that the foregoing  
20 is true and correct. Executed on 10/09/2025 (date), in riverside (city),  
21 California.

22  
23 By: alsha jackson  
alsha jackson (Oct 9, 2025 17:30:21 PDT)  
24 ALSHA JACKSON  
25  
26  
27  
28