

**From:** [Ernie Garcia](#)  
**To:** [West, Danielle@Labor](mailto:West_Danielle@Labor)  
**Subject:** Public Comment – Proposed PAGA Regulations  
**Date:** Monday, March 23, 2026 4:57:51 PM

---

**THIS EMAIL ORIGINATED FROM OUTSIDE OF YOUR ORGANIZATION**

DO NOT click on links or open attachments unless you recognize and/or trust the SENDER.

Hello Mrs. West,

GS1 Group, Inc. appreciates the opportunity to provide comments regarding the proposed regulations governing PAGA administrative procedures.

As a California-based employer, we are generally supportive of these proposed regulations and believe they represent an important step toward improving clarity, consistency, and fairness in the PAGA process. In particular, the enhanced specificity requirements for notices, the formalization of the cure process, and increased oversight of filings and settlements provide employers with a more structured and transparent framework to address potential violations.

As a small business, we make every effort to operate in full compliance with California labor laws and routinely take proactive steps to ensure our policies, procedures, and payroll practices meet or exceed legal requirements. However, under the current system, even minor or inadvertent issues can expose employers to significant financial liability. More concerning is that defending against PAGA claims, regardless of merit, can be extremely costly and time-consuming.

We have experienced firsthand how vague, boilerplate notices and overly broad allegations make it difficult to assess claims or take meaningful corrective action. In some instances, the cost of defending against such claims can be substantial, even where the employer has acted in good faith and is ultimately found to be compliant. For small businesses, this creates a disproportionate burden and, in some cases, can pose a serious challenge to continued operations.

The proposed regulations addressing notice specificity, discouraging conclusory filings, and establishing clearer procedural safeguards are therefore critical. These measures will help ensure that claims are grounded in specific facts, promote early resolution where appropriate, and reduce the potential for misuse of the process.

As a small business that makes every effort to operate in full compliance with California labor laws, we are encouraged by these proposed regulations and believe they represent a positive step forward. Employers like us invest significant time and resources to ensure we are doing things the right way and meeting all legal requirements.

However, under the current framework, even minor or inadvertent errors can expose employers to substantial financial liability. Equally concerning is the cost of defending against PAGA claims, which can be significant even where the employer has acted in good faith and is ultimately found to be compliant. For small businesses, this creates a challenging and, at times, discouraging operating environment.

We believe these proposed revisions will help address some of these concerns by improving transparency, discouraging unsupported claims, and providing a more structured process for resolving issues. In doing so, they will better balance the interests of employees with the realities faced by employers who are genuinely striving to comply with the law.

We appreciate the LWDA's efforts to implement these changes and look forward to the continued development of a more fair, transparent, and workable PAGA framework.

Thank you for the opportunity to provide input and for your continued efforts to improve the administration of California's labor laws.

Best regards,

**Ernie Garcia**

President | GS1 Group, Inc.

Executive Protection | Residential Security | Protective Intelligence

3933 Foothill Blvd., Suite B, Glendale, CA 91214

**T:** 626-510-6384 | **F:** 818-975-5500

egarcia@gs1security.com | gs1security.com