



March 23, 2026

Danielle West, PAGA Rulemaking and Policy Analyst
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Sent by email to: Danielle.West@labor.ca.gov

SUBJECT: Proposed PAGA rulemaking noticed February 6, 2026
Comment due date march 23, 2026

To: California Labor and Workforce Development Agency

Housing Contractors of California is a non-profit trade association of specialty contractors who perform work primarily in the production housing arena.

We are in full support and have signed onto the letter being issued today by the California Chamber of Commerce.

We have additional recommendations to add above and beyond the Chamber letter.

1. We believe all attorneys and/or attorney firms who are designated as “Vexatious Filers” should be suspended from being able to make any new PAGA filings for a period of 3 years. It is a common practice by many regulatory bodies to suspend those who clearly abuse the system. After the suspension has ended, these parties should be placed under a probationary period of 2 years. During those 2 years, after a 2nd violation is evidenced, the parties would be suspended again for a period of 5 years.
2. Along with this provision, there should be a prohibition from any attorney or attorney firm giving any type of referral fee to a suspended party.
3. We believe the Labor Commissioner’s Office has sufficient resources to take over at least 50% of the PAGA filings by a “High-Frequency Filer”. It has been 2 years since an audit showed that the LCO was understaffed. Employers have continued to contribute full funding during that period, averaging \$180 Million over the last 5 years. The rule should then be that at least every other filing by a “High-Frequency Filer” be sent to the LCO for investigation and adjudication.

There is clear evidence that employees and employers in California are suffering harm due to abuse of PAGA by a relatively small number of attorneys.

All recommendations, including ours and the California Chamber of Commerce, should be implemented without delay.

Sincerely,

A handwritten signature in dark ink that reads "Bruce Wick". The signature is written in a cursive, slightly slanted style.

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