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[REDACTED]
[REDACTED] LLP
Newport Beach, CA 92660
(949) [REDACTED]
(949) [REDACTED]
[REDACTED] llp.com
[REDACTED].com

Respondents/Employers

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
LABOR COMMISSIONER'S OFFICE
RETALIATION COMPLAINT INVESTIGATION UNIT

SHARON LOGAN

Complainant,

v.

[REDACTED] LLP

Respondent.

CASE NO.: RCI-CM-909845
Assigned to: Josh Carter,
Deputy Labor Commissioner

RESPONDENT'S INDEX OF DOCUMENTS

Date: December 15, 2022
Time: 8:30 a.m.
Teleconference Dial-in number: 267-807-9529
Access code: 276112

NO.	DESCRIPTION
A	RESPONDENT'S RESPONSE TO COMPLAINT
B	RESPONDENT'S STATEMENT OF JUSTIFICATION EXPLAINING THE REASON FOR ANY ADVERSE ACTIONS THAT WERE TAKEN AGAINST COMPLAINANT.
C	RESPONDENT'S STATEMENT RE- OTHER CLAIMS
D	RESPONDENT'S STATEMENT OF LEGAL ENTITY
	INDEX OF EXHIBITS



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CASE NO.: RCI-CM-909845
Assigned to: Josh Carter,
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RESPONDENT'S RESPONSE TO COMPLAINT

Date: December 15, 2022
Time: 8:30 a.m.
Teleconference Dial-in number: 267-807-9529
Access code: 276112

Respondent [REDACTED] LLP respectfully submits this response to the factual allegations in the complaint of Sharon Logan ("Logan").

I. SUMMARY OF RESPONSE

[REDACTED] LLP is a law firm that is responsible for handling hundreds of thousands of dollars in client funds in its client trust account. Complainant's allegations of "retaliation" are categorically untrue and there is zero factual basis to support her claims. Complainant's employment was terminated because clients had complained about her, she was untruthful, made serious mistakes in her work [REDACTED]

[REDACTED]

[REDACTED]

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II. FACTUAL BACKGROUND

[REDACTED] LLP is a small law firm in Newport Beach California. It has two partners ([REDACTED]), a paralegal and an office manager. In over 30 years of practice with multiple law firms, neither has ever had an employment practices claim filed against them.

Complainant Sharon Logan was hired by the Respondent after [REDACTED]'s first office manager announced her retirement in July 2021 and the firm began looking for a replacement. In October 2021, the firm extended a written offer of employment to Logan. Complainant was employed for 10 ½ months and was terminated for cause after Respondent received complaints about her [REDACTED] had improperly handled client trust funds, had allowed the firm's operating account to become overdrawn, [REDACTED] demonstrating she was unable to manage the firm's finances, and had shared confidential client information.

III. COMPLAINANT'S RESPONSE TO FACTUAL ALLEGATIONS

1. **Complainant's Assertion in Complaint:** [REDACTED]

Respondent's Response: The firm extended a conditional offer of employment to Logan on October 21, 2021. The offer specifically said, "Further, this letter is simply for your information and is not to be construed as a contract of employment. This offer is also contingent upon our satisfaction with the results of reference checks." [10/21/2021 Conditional Offer of Employment attached as **Exhibit 6.**]

[REDACTED]

[REDACTED]

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[REDACTED]

Complainant started as the firm's office manager and bookkeeper on November 1, 2021. Complainant was responsible for keeping accurate financial records for the firm, and for sending bills to the clients, depositing client payments, paying vendors and maintaining the records and registers for the firm's client trust account. Complainant was responsible for interacting with clients and responding to administrative questions and following up with clients to ensure the firm's invoices were paid. In addition, Complainant was tasked with hiring consultants to revise and revamp the firm's website, and Complainant was responsible for overseeing that project.

On Tuesday, September 13, 2022 the firm's partners received a call from a client in Los Angeles who wanted to discuss his case. During the call, the client complained about Sharon Logan and his interactions with her.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

- a. [REDACTED]
- b. [REDACTED]
- c. [REDACTED]
- d. [REDACTED]
- e. [REDACTED]

In addition, the firm holds significant funds in trust for clients. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Complainant's mismanagement of funds was not limited to the client trust account. On at least two occasions Complainant had failed to keep accurate accounting records and allowed the firm's operating account to become overdrawn requiring the firm to have to transfer funds from its reserve account to the operating account.

Complainant also failed to properly oversee the redeployment of the firm's website. Complainant and the vendor she hired failed to close existing security gaps and the firm's email account was hacked. The hacker was able to send emails directly from firm email addresses.



In addition, as the firm conducted its due diligence, on September 13, 2022 the firm was contacted by email by a person



[Exhibit 12.] Preservation of a client's confidentiality is one of the most important duties a law firm owes to its clients and Complainant's breach of this confidence is unacceptable and in and of itself was sufficient justification for Respondent's termination of Complainant's employment.



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[REDACTED]

Respondent terminated Complainant’s employment on September 15, 2022. A copy of the letter terminating Complainant’s employment given to her at her exit interview is attached as **Exhibit 13**.

2. **Complainant’s Assertion in Complaint:** “I made numerous complaints to the managing partner regarding no meal or rest breaks.”

Respondent’s Response: This statement is categorically untrue and false. The firm maintains a poster on the wall in the kitchen area and immediately next to the water cooler which is plainly visible and which is current as of 2022 and lists all statutory California and Federal Employment Notices. **[Exhibit 14.]** Respondent made sure that Complainant was well aware of her rights as an employee.

Complainant’s principals have checked their emails and text messages and otherwise spent over 40 hours investigating Complainant’s assertions and responding to her complaints. The firm’s principals also reviewed over 800 pages of emails between Complainant and the firm’s paralegal employee. The firm could find no written communications from Complainant complaining about lack of meal or rest breaks. The partners could recollect no instance of Complainant making a verbal complaint about lack of meal or rest breaks.

Indeed, Complainant never made any such complaints and is being untruthful when she says she did. Respondent is a small two-partner law firm and Complainant was the office manager responsible for human resources and accounting procedures. She was specifically hired as an “exempt employee” and acknowledged this in signing her offer letter on October

[REDACTED]

1 21, 2022. [Exhibit 6.] Complainant was technically not entitled to “rest breaks,” but at all
2 times was 100% free to take whatever meal break or rest break that she wanted to.
3 Complainant was given almost complete autonomy (including the ability to work remotely
4 when she requested) and was never told she could not take a meal or rest break and was never
5 prevented by the firm from taking a rest or meal break.

6 The truth of the matter is, Respondents often brought in breakfast and lunch for the
7 firm from restaurants in the area. Complainant was frequently asked what she wanted for
8 lunch and food was brought back for her or Complainant went out with the firm’s credit card
9 and bought food for herself and the firm. Participation in firm meals was always optional and
10 business was not conducted during the meals.

11 A detailed review of the firm’s credit card statements from January to September 2022
12 during the 306 days of Complainant’s employment shows that on *at least 95* occasions the
13 firm bought breakfast or lunch or both for the employees and partners in the firm.

14 It is false that Complainant made complaints about lack of meal and rest breaks. As
15 set forth in detail in Section 1 above, Complainant was terminated for cause and certainly not
16 because of non-existent complaints about meal and rest breaks.

17 3. **Complainant’s Assertion in Complaint:** “I actually submitted a resignation letter
18 on June 3, 2022 but the founding partner asked me to stay being subjected to a hostile work
19 environment by a co-worker and a client and asked to potentially commit fraud on behalf of
20 the clients by the law firm partners.”

21 **Respondent’s Response:** Yes, Complainant did submit her resignation letter on
22 June 3, 2022. [Exhibit 15.] The letter makes no mention of any issues Complainant had with
23 the firm. The truth is the firm accepted Complainant’s resignation and asked her to stay in her
24 position until a new office manager could be found, and the firms asked Complainant to assist
25 with finding her replacement. Complainant agreed and the firm’s managing partner asked
26 Complainant to list the Office Manager position on Indeed (an online resume and job finding
27 service).
28

1 When faced with the reality that her resignation was accepted and she was going to
2 have to find a new job, Complainant changed her mind about resigning. Complainant spoke
3 with Respondent's senior partner [REDACTED] on June 7, 2022 and told him that she had
4 decided to withdraw her resignation and wished to remain employed with the firm.
5 Respondent did not "twist Complainant's arm" or force her to stay. It was entirely
6 Complainant's choice. [See Complainant's 06/08/2022 email, **Exhibit 16.**]

7 As to claims of "hostile work environment," it is impossible to respond without
8 Complainant providing particulars. The firm does not tolerate harassment or discrimination.
9 It is unknown what client Complainant is referring to. [REDACTED]

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED] This
16 was conflict was resolved with counseling from both of Complainant's partners and
17 Complainant did not mention "passive aggressive" or other hostile work environment
18 behavior again. To be clear, Complainant never again told Respondent's principals that she
19 thought she was being subjected to a hostile work environment or unequal treatment or any
20 other complaint until after her employment was terminated.

21 As to being "asked to potentially commit fraud on behalf of the clients by the law firm
22 partners," that is simply untrue. What actually happened is this. [REDACTED]

23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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4. **Complainant's Assertion in Complaint:** "I made numerous complaints verbally and by texts [regarding no meal or rest breaks]. I was told by the managing partner to stop snitching and bringing drama to the office."

Respondent's Response: The allegations as to "no meal or rest breaks" are addressed in Section 2, above. As to the allegation that Complainant "was told by the managing partner to stop snitching and bringing drama to the office," that is untrue.

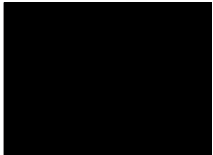
[REDACTED] is the managing partner of the firm. Mr. [REDACTED] would testify under penalty of perjury that he never, ever told Complainant to "stop snitching" or words of similar effect, and never said or acted in any manner to prevent Complainant from exercising any rights or claiming redress for any grievance Complainant thought she might have.

As to the "bringing drama to the office" claim, this does not relate to any complaint about meal or rest breaks but does relate to the early conflict between Complainant and the paralegal. [REDACTED]



5. **Complainant's Assertion in Complaint:** "I was salaried and they could work me as many hours as they like." Complainant alleges hourly wages of \$23.97/hr. [Complaint Part 4, #29.]

Respondent's Response: Complainant was clearly not an hourly employee. The October 21, 2021 offer letter from the firm and signed by Complainant that same day clearly states, "The Office Manager position is classified in compliance with the California Labor Code as an exempt position, and you will be paid on a salary basis without eligibility for overtime. Your starting wage will be \$70,000.00 per year. The Firm's payroll is currently processed on a semimonthly basis, so you will be paid twice a month." [Exhibit 6.]



1 Complainant was never told the firm could 'work her as many hours as they like.'
2 Complainant was an exempt, salaried employee so there are no timecards or specific records
3 showing how much she actually worked, but it was rarely, if ever, more than 40 hours per
4 week, and frequently less because Complainant was allowed to work remotely upon request
5 and was responsible for her own hours.

6 **6. Complainant's Assertion in Complaint:** [REDACTED]

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 **Respondent's Response:** Respondent did follow the guidelines of the Centers for
12 Disease Control, the Orange County Health Official and the emergency orders of the
13 Governor of the State of California and the State Supreme Court. The firm publicly posted
14 the ongoing updates to the authorities' protocols on the wall next to the Federal and State
15 Employment Rules as the new guidelines became available. Moreover, as the firm
16 administrator, the Complainant herself was responsible for keeping up with the fluid and
17 dynamic requirements on how to deal with the ongoing pandemic situation and was
18 responsible for advising and implementing proper Covid protocols for the firm.

19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED] Respondent diligently followed all known Covid-19 protocols.
27 [REDACTED]
28 [REDACTED]

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was allowed to work remotely when she asked to.

Complainant's termination had nothing to do with Covid or what Complainant did or said during that time. Complainant's employment was terminated for the reasons stated above.

IV. CONCLUSION

Respondent has spent over 40 hours reviewing documents, interviewing principals and employees and checking on each aspect of the claims raised by Complainant in her Complaint. Not one of the allegations raised has merit, and many are simply untruthful.

Complainant's employment was not terminated in retaliation for any protected activity she engaged in. Rather, Complainant's employment was justifiably terminated because clients had complained about her, she was untruthful, she made serious mistakes in her work [REDACTED]

[REDACTED]

Respondent respectfully requests the honorable Deputy Labor Commissioner find that Respondent was justified in terminating Complainant's employment and that Complainant was not terminated in retaliation for any protected activity she engaged in.

Respectfully submitted,

DATED: December 10, 2022

[REDACTED] LLP
By: [REDACTED] Esq.
[REDACTED] Esq.
Attorneys for Respondent



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[REDACTED]
[REDACTED] LLP
Newport Beach, CA 92660
(949) [REDACTED]
(949) [REDACTED] (fax)
[REDACTED] llp.com
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Respondents/Employers

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
LABOR COMMISSIONER'S OFFICE
RETALIATION COMPLAINT INVESTIGATION UNIT

SHARON LOGAN
Complainant,
v.
[REDACTED] LLP
Respondent.

CASE NO.: RCI-CM-909845
Assigned to: Josh Carter,
Deputy Labor Commissioner

RESPONDENT'S STATEMENT OF
JUSTIFICATION EXPLAINING THE
REASON FOR ANY ADVERSE ACTIONS
THAT WERE TAKEN AGAINST
COMPLAINANT.

Date: December 15, 2022
Time: 8:30 a.m.
Teleconference Dial-in number: 267-807-9529
Access code: 276112

Respondent [REDACTED] LLP respectfully submits this Statement of Justification explaining the reason for any adverse actions that were taken against complainant Sharon Logan ("Logan").

I. **FACTS**

Complainant Sharon Logan was hired by the Respondent effective November 1, 2021 after Respondent's first office manager announced her retirement. On October 21, 2021 Respondent extended a written offer of employment to Logan. [Exhibit 6.] Complainant was employed for 10 ½ months and was terminated for cause effective September 13, 2022 after Respondent discovered



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Complainant [REDACTED] had improperly handled client trust funds, had allowed the firm's operating account to become overdrawn, [REDACTED] demonstrating she was unable to manage the firm's finances, and that Complainant had shared confidential client information. [The termination letter is attached as **Exhibit 13.**]

[REDACTED]

Respondent's Response to Complaint details the factual elements of Respondent's position. Respondent did not terminate Complainant's employment in retaliation for any protected action Complainant had taken. Complainant's employment was terminated only for the following reasons:

1. [REDACTED]

After Respondent provided Complainant with a conditional offer of employment, Respondent [REDACTED]

[REDACTED]

2. Mis-categorization of Client Trust Funds

[REDACTED]

[REDACTED]

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[REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. **Failure to Keep Accurate Accounting Records**

On at least two occasions Complainant failed to keep accurate accounting records and allowed the firm's operating account to become overdrawn requiring the firm to have to transfer funds from its reserve account to the operating account to cover the shortfall.

5. **Failure to Properly Oversee Website Redeployment**

Complainant failed to properly oversee the redeployment of the firm's website. Complainant and the vendor she hired failed to close existing security gaps and the firm's email account was hacked. The hacker was able to send emails directly from firm email addresses. [REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

6. Breach of Client Confidentiality

On or about September 14, 2022, Respondent learned that Complainant had texted screenshots of confidential client information to third parties outside the firm. [REDACTED]

[REDACTED]

Preservation of a client's confidentiality is one of the most important duties a law firm owes to its clients and Complainant's beach of this confidence is unacceptable.

II. CONCLUSION

Respondent was justified in terminating Complainant's employment. The termination was for-cause based on Complainant's poor job performance and other employment related factors and not because Complainant was engaged in any protected activity. Respondent was not only justified in terminating Complainant's employment [REDACTED]

[REDACTED]

DATED: December 10, 2022

[REDACTED] LLP

[REDACTED]

By:

[REDACTED] Esq.
[REDACTED] Esq.
Attorneys for Respondent

[REDACTED]

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Assigned to: Josh Carter,
Deputy Labor Commissioner

RESPONDENT'S STATEMENT RE-
OTHER CLAIMS

Date: December 15, 2022
Time: 8:30 a.m.
Teleconference Dial-in number: 267-807-9529
Access code: 276112

Respondent [REDACTED] LLP is aware of the following "Other Claims" which Complainant has filed which mention or refer to Complainant's employment with Respondent:

- 1. Employment Development Department ("EDD")
P.O. Box 989059
West Sacramento, CA95798-9059
Complainant: Sharon J. Logan [REDACTED]
SSN: [REDACTED]

Complainant Sharon Logan filed a claim for unemployment insurance benefits after her termination of employment with Respondent on September 13, 2022. On September 21, 2022, the EDD mailed [REDACTED] LLP notice of the claim. [REDACTED] LLP responded to the claim on September 27, 2022. [Exhibit 1- Response to Notice of EDD Claim.]



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On November 29, 2022, the EDD mailed a Notice of Redetermination which stated Logan

[REDACTED]

[REDACTED]

On November 29, 2022, the EDD mailed an Appeal Acknowledgement and Welcome Letter advising [REDACTED] LLP that an appeal had been filed in Case Number 10139104. [Exhibit 3.] As of December 7, 2022, [REDACTED] LLP has not received any notice that a hearing date has been set for the appeal.

2. [REDACTED]

[REDACTED] LLP is identified as Logan's employer on page 10. [REDACTED]

3. Sharon Logan has filed a "trip and fall" claim against the owners and managers of the building where Logan was employed with [REDACTED], LLP. Respondent does not have any information about this claim other than claim number and contact information for the claims adjuster:

Bea Dominguez
Senior Resolution Specialist
P.O. Box 2971
Clinton, IA 52733-2971
Complainant: Sharon Logan
Date of Incident: 08/06/2022
Sompo Claim No.: 10580897

[REDACTED]

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4. In her exit interview on September 15, 2022 Sharon Logan presented Respondent with an unfiled Complaint for Hostile Work Environment, Harassment and Workplace Discrimination which she asserted she would file if she were not paid \$40,000 to settle the claims. A copy of the unfiled complaint and Civil Case Cover Sheet signed and dated by Sharon Logan on July 30, 2022 is attached as **Exhibit 5**. Respondent does not know if the complaint has been filed. As of December 10, 2022 [REDACTED] LLP has not been served with a summons and cross-complaint

Respondent is not aware of any Other Claims Complainant may have filed which relate to or concern Complainant's employment with Respondent.

DATED: December 10, 2022

[REDACTED] LLP
[REDACTED]
By: [REDACTED]
[REDACTED] Esq.
[REDACTED] Esq.
Attorneys for Respondent



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RETALIATION COMPLAINT INVESTIGATION UNIT

SHARON LOGAN
Complainant,
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CASE NO.: RCI-CM-909845
Assigned to: Josh Carter,
Deputy Labor Commissioner

RESPONDENT'S STATEMENT OF LEGAL ENTITY

Date: December 15, 2022
Time: 8:30 a.m.
Teleconference Dial-in number: 267-807-9529
Access code: 276112

Respondent [Redacted] LLP is a California limited liability partnership registered and in good standing with the California State Bar with Certificate of Registration No. 56074. The two partners of [Redacted] LLP are [Redacted]. [Redacted] LLP does not do business under any other names and has one office located in Newport Beach, California.

DATED: December 10, 2022

[Redacted] LLP

By: [Redacted]
[Redacted] Esq.
[Redacted] Esq.

[Redacted]

INDEX OF EXHIBITS

NO.	DATE	DESCRIPTION
1	09/27/2022	[REDACTED] LLP response to Logan EDD claim
2	11/29/2022	Notice of Redetermination
3	11/29/2022	Appeal Acknowledgement and Welcome Letter
4	08/07/2022	[REDACTED]
5	07/30/2022	Unfiled complaint and Civil Case Cover Sheet signed and dated by Sharon Logan on July 30, 2022.
6	10/21/2021	Conditional Offer of employment
7	2017	[REDACTED]
8	2000	[REDACTED]
9	2003	[REDACTED]
10	2015	[REDACTED]
11	1999	[REDACTED]
12	02/03/2022	Improper text messages from Claimant
13	09/15/2022	Termination of Employment Letter
14	2022	California and Federal Employment Notices
15	06/03/2022	Claimant's resignation letter
16	06/08/2022	Claimant's email withdrawing her resignation
17	01/14/2022	[REDACTED]
18	4/14, 4/21/2022	[REDACTED]

CASE NO. BCL-CM-909845
Logan v. [REDACTED], LLP

REPLY Due
09 21/2022

NOTICE OF UNEMPLOYMENT INSURANCE CLAIM FILED

22000 / 25753 / 0831 / 1 / 1 / SS 1

NEWPORT BEACH CA 92660-2801

Mail Date: 09/21/2022

New Claim: X A

Additional Claim:

ACTION REQUIRED

1. Gather the necessary facts for this claim.
2. Complete the reverse side of this form.
3. Mail this response within 10 calendar days of the above mail date, to the address shown above.

Failure to respond within 10 calendar days may result in an increased employment tax rate and employer penalties.

You received this notice because the claimant shown below filed a claim for unemployment insurance benefits and listed you as his/her most recent employer. The claimant provided the following information:

Claimant's Name: **SHARON J LOGAN**

Social Security Number: [REDACTED]

Effective Date of Claim: **09/18/2022**

Last Date Worked: **09/13/2022**

Reason for Separation: **REASONS NOT LISTED**

REPORTING FACTS

The law requires you to submit any facts in your possession which may affect a claimant's eligibility for benefits. These facts will be used in determining the claimant's eligibility for benefits. Provide information to the Employment Development Department (EDD) if this claimant:

- Voluntarily quit, was discharged, or fired.
- Is working, whether full-time or part-time.
- Performed services as a sports or athletic participant.
- Is a school employee and has a contract for or reasonable assurance of returning to work following a recess.
- Left work because of a strike or trade dispute.
- Has refused employment.
- Is not legally entitled to work in the U.S.
- Is not able to work, available for work, or seeking work.
- Is receiving a pension.

TIME LIMITS FOR REPLYING

Submit facts in writing to the EDD in the envelope provided within 10 calendar days from the above mail date to be considered timely. If your mailing is late, explain your reason for delay as the time limit may be extended only for good cause. If you respond timely, you will be issued a written notice of the EDD's determination concerning the claimant's eligibility which will provide you with appeal rights. In addition, if facts are submitted regarding a quit or discharge, you will be issued a ruling as to whether your reserve account will be subject to charges if you are a tax-rated employer. If you respond untimely, the EDD will still consider the facts provided by you. However, you may not be issued a written notice of the EDD's determination, including appeal rights, unless the EDD determines that you had good cause for the delay. If you acquire facts that could not have reasonably been known within this 10-day response period, provide these facts to the EDD within 10 calendar days of acquiring them.

ELIGIBILITY DETERMINATION INTERVIEW

It may be necessary to contact you by phone or letter for additional eligibility information. If no response is received, the EDD is required to make an eligibility determination based on available information.

EMPLOYER REQUIREMENTS AND POTENTIAL PENALTIES

The California Unemployment Insurance Code (CUIC) provides penalties for employers who:

- Willfully make false statements or representations, or willfully fail to report a material fact in connection with a separation issue or a written statement concerning reasonable assurance of a claimant's reemployment (CUIC Section 1142).
- Willfully make a false statement or knowingly fail to disclose a material fact to obtain, increase, reduce, or defeat any payment of benefits (CUIC Section 2101).
- Fail to respond timely or adequately to requests of the Department for information and are at fault for causing overpayment of benefits (CUIC Section 803(d), 821(c), and 1026.1).

For more information on fraud and penalties, visit www.edd.ca.gov and select the Fraud and Penalties link.

Did you know? You can electronically receive and respond to future requests for separation information by using the State Information Data Exchange System (SIDES). To get started, visit the SIDES web page at www.edd.ca.gov/SIDES.

- Check this box if you are an agent or third party administrator and no longer represent this employer. Complete the Employer and Contact Information section below and return this form to the EDD.

Reporting Facts:

Claimant's Social Security Number (from your payroll records): [REDACTED]

Claimant's Job Title: OFFICE MANAGER Rate of Pay \$: 70,000.00 per: YEAR

Last Date Physically Worked: 09/12/2022 Length of Employment: 9.5 Months - Started 11/01/2021

Date of Separation (if different from last date physically worked): 09/13/2022

Name of immediate supervisor: [REDACTED] - MANAGING PARTNER

Reason for Separation (Check only one):

- Voluntary Quit Misconduct/Fired Laid Off/Lack of Work* Trade Dispute

Who did the claimant notify of the quit? Who terminated the claimant? [REDACTED]

Person's Job Title: MANAGING PARTNER

*Do not submit this form to the EDD if the claimant was laid off due to lack of work and no other eligibility issues exist.

Provide a brief explanation of the final incident that resulted in the claimant's separation:

SEE ATTACHED.

Compensation:

- Check this box if you paid or will pay any compensation, aside from regular salary, covering any time on or after the effective date of this claim. Do not check this box if the claimant has been separated from your employ for an indefinite period and has or will receive only vacation pay.

If you checked the box, please provide the following information:

Amount \$: _____ Type of Payment: _____ for period from _____ through _____

Employer and Contact Information:

Employer Name: [REDACTED] LLP

Employer Payroll Tax Account Number: [REDACTED]

By signing below, I certify that I am an authorized representative and the information provided in response to this notice is true and correct. I understand that any false statement, false representation, or failure to report a material fact may result in employer penalties and charges.

Print Name: [REDACTED] Ext.: _____

Signature: [REDACTED] Title: MANAGING PARTNER Date: 09/27/2022

[REDACTED] LLP
[REDACTED] Esq. [REDACTED] ATTORNEYS AT LAW [REDACTED] LLP.COM
Newport Beach, CA 92660
Tel: (949) [REDACTED]
Fax: (949) [REDACTED]
[REDACTED] LLP.COM
WRITER'S DIRECT LINE:
(949) [REDACTED]

September 27, 2022

Employment Development Department
P.O. Box 989059
West Sacramento, CA 95798-9059

Claimant: Sharon J. Logan [REDACTED]
SSN: [REDACTED]

ATTACHMENT TO NOTICE OF UNEMPLOYMENT INSURANCE CLAIM FILED

This is an attachment to the response of [REDACTED] LLP to the Notice of Unemployment Insurance Claim Filed with a mail date of 09/21/2022.

"Provide a brief explanation of the **final incident** that resulted in the claimant's separation:"

Response:

1. Claimant was fired for cause. Claimant was the Office Manager for [REDACTED] LLP which is a small law firm. Claimant oversaw the firm's financial accounts, including the firm's client trust account and credit card accounts. On September 13, 2022 a client of the firm complained about Claimant and her demeanor. [REDACTED] Claimant [REDACTED]
[REDACTED]
2. Claimant was continuously making mistakes in her work and her performance of her duties was substandard and deficient. In August 2022, Claimant allowed the firm's operating account to become overdrawn because of her oversight.
3. Claimant failed to ensure the firm's email systems were protected from hacking. [REDACTED]
[REDACTED] After the problem was discovered, Claimant was directed to transition the

firm's email platform to a more robust and secure email provider. Claimant failed to do so or to take the measured necessary to ensure the transition.

4. Claimant discussed the firm's clients and business in texts she sent to third parties. [REDACTED]

5. On or about September 4, 2022 the firm received a letter from the EDD dated August 30, 2022, titled [REDACTED]

6. Claimant had previously tendered her resignation on June 3, 2022, then purported to withdraw the resignation. Claimant's resignation letter showed she was unsatisfied with her employment and that [REDACTED] LLP was no longer a suitable place for her to work.

7. After Claimant's termination for cause, the firm discovered that Claimant had not been truthful in October 2021 when she submitted her resume and applied for the job as office manager.

As a result of all of these incidents, Claimant was terminated effective September 13, 2022. Claimant was unable to come in to work on September 14, 2022 to return the firm's property in her possession, including a firm credit card and firm laptop. A copy of the September 15, 2022 Termination of Employment letter provided to Claimant when she did come in is attached. The Department may also wish to look at the following public websites (created by parties unrelated to the firm) purporting to show additional prevarications on Claimant's part.

[REDACTED]

Very truly yours,

[REDACTED]

Managing Partner

[REDACTED] LLP

ATTORNEYS AT LAW

[REDACTED] Esq.

Newport Beach, CA 92660

Tel: (949) [REDACTED]

Fax: (949) [REDACTED]

WWW: [REDACTED] LLP.COM

[REDACTED] LLP.COM

WRITER'S DIRECT LINE:
(949) [REDACTED]

September 15, 2022

Email only [REDACTED]
Sharon Logan

[REDACTED]

TERMINATION OF EMPLOYMENT

Dear Sharon:

This letter amends and supersedes our prior letter of this date and summarizes your exit interview of this date.

Your at-will employment with [REDACTED] LLP ended at 5:00 p.m. on September 13, 2022. This letter was provided in your exit interview on September 15 because this is the first opportunity to do so [REDACTED]

Your termination is due to the following reasons. [REDACTED]

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]