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16 TANIKA TURLEY

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 COUNTY OF SAN FRANCISCO

19 TANIKA TURLEY, individually and on)
20 behalf of all others similarly situated,)
21 Plaintiff,)
22 v.)
23 CHIPOTLE SERVICES, LLC, a Colorado)
24 business entity, and DOES 1 through and)
25 including DOE 100,)
26 Defendants.)

27 Case No. CGC-15-544936
28 **FIRST AMENDED COMPLAINT**
CLASS ACTION - DEMAND FOR JURY TRIAL
1. Cal. Lab. Code sections 201, 202 and 203—
Timely Payment of Final Wages
2. Cal. Lab. Code section 226(a)—Failure to
Provide Compliant Wage Statements
3. Cal. Lab. Code section 226(b)(c)(f)—Failure
to Provide Proper Response to Document
Request
4. Cal. Lab. Code section 226.7—Failure to
Provide Proper Rest Breaks
5. Cal. Lab. Code section 226.7—Failure to
Provide Proper MealBreaks
6. Cal. Bus. & Prof. Code section 17200 *et*
seq.—Disgorgement of Profits and Injunction
7. Cal. Lab. Code § 2698 *et seq.*, Labor Code
Private Attorneys General Act

**ELECTRONICALLY
FILED**
*Superior Court of California,
County of San Francisco*
07/23/2015
Clerk of the Court
BY: MAURA RAMIREZ
Deputy Clerk

1 COMES NOW Plaintiff, and for her causes of action against Defendant, alleges:

2 **PARTIES**

3 (1) Plaintiff TANIKA TURLEY (“TURLEY” or “Plaintiff”) is an individual who, at time
4 periods relevant to this Complaint, was employed by Defendant within the County of San Francisco,
5 State of California. Plaintiff is a resident of San Francisco, California.

6 (2) Defendant CHIPOTLE SERVICES, LLC (“CHIPOTLE” or “Defendant”), is a limited
7 liability company which is doing business within the State of California, County of San Francisco.

8 (3) The true names and/or capacities, whether individual, corporate, associate or otherwise,
9 of defendants Does 1 to 100 inclusive, are unknown to Plaintiff at this time, who therefore sue said
10 defendants by such fictitious names. When the true names and capacities of said defendants have been
11 ascertained, Plaintiff will amend this complaint accordingly. Plaintiff is informed and believes and
12 thereupon alleges that each defendant designated herein as a Doe is responsible, negligently,
13 intentionally, contractually, or in some other actionable manner, for the events and happenings
14 hereinafter referred to, and caused injuries and damages proximately thereby to Plaintiff as is hereinafter
15 alleged, either through said defendants' own wrongful conduct or through the conduct of their agents,
16 servants, employees, representatives, officers or attorneys, or in some other manner.

17 (4) Plaintiff is informed and believes and thereon alleges that at all times herein mentioned
18 defendants, and each of them, were the agents, servants, employees and/or joint ventures of their co-
19 defendants, and were, as such, acting within the scope, course and authority of said agency,
20 employment, corporate capacity and/or joint venture, and that each and every defendant as aforesaid,
21 when acting as a principal, was negligent and reckless in the selection and hiring of each and every other
22 defendants as an agent, servant, employee, corporate officer and/or joint venture, and that each and
23 every defendant ratified the acts of his co-defendants.

24 **JURISDICTION AND VENUE**

25 (5) This is a civil action seeking continuing wages, restitution, damages and attorney’s fees
26 and costs by reason of the Defendant’s violations of various sections of the California Labor Code and
27 section 17200 *et seq.* of the California Business and Professions Code.

28 (6) Pursuant to California Code of Civil Procedure section 382, Plaintiff brings this case

1 individually and as a class action on behalf of employee classes consisting of individuals who have been
2 employed by Defendant in California.

3 (7) Venue as to Defendant is proper in this judicial district, pursuant to California Business
4 and Professions Code section 17203 and California Code of Civil Procedure sections 395(a) and 395.5.
5 Defendant maintains an office, transacts business, has an agent, or is found in the County of San
6 Francisco and is within the jurisdiction of this Court for purposes of service of process. The unlawful
7 acts alleged herein had a direct effect on and were committed within the State of California.

8 **GENERAL ALLEGATIONS**

9 (8) Defendant operates various restaurants in San Francisco. Turley's employment with
10 Defendant or their predecessor commenced on or about May 4, 2014.

11 (9) Defendant's facilities employed hourly employees, such as Plaintiff. These employees
12 are engaged in non-exempt duties, working in the restaurant business.

13 (10) On Thursday, January 15, 2015, at approximately 4:15 p.m., Turley was fired by
14 Defendant. Nevertheless, she was not provided her accrued wages until many days thereafter, her final
15 paycheck being cut no earlier than on February 3, 2015. A partially redacted copy of the wage statement
16 is reproduced as page 20 of Exhibit 1, Exhibit 1 being a group exhibit reflecting wage statements issued
17 from Defendant to Plaintiff. These items were all printed in Colorado.

18 (11) On March 5, 2015, Plaintiff made a request of Defendant for the data to which she was
19 entitled under section 226 of the California Labor Code. A copy of her request, as well as Defendant's
20 reply cover letter, is attach as Exhibit 2. Defendant made untimely response, more than twenty-one days
21 thereafter, failing to provide data regarding the time of Plaintiff's meal breaks, if any. The provided data
22 reveal that Plaintiff's last day of work was, in fact, January 15, 2015, but she was not to be notified of
23 her termination until January 16, 2015. Exhibit 3 is a copy of Defendant's View Event Terminate screen
24 shot of Plaintiff, confirming that her last day of work was, in fact, January 15, 2015.

25 (12) In derogation of California law, Defendant does not track the times when Plaintiff or its
26 other California employees were provided meal breaks. Further, in derogation of the laws of the State of
27 California, Defendant does not keep track of the tips earned by and distributed to Plaintiff or other of
28 Defendant's employees as wages.

1 (13) Via a text message to her superior, Turley asked for her paycheck on Saturday, January
2 17, 2015, but the paycheck was not provided to her until she went to the restaurant on January 22, 2015.
3 On January 17, 2015, Turley wrote to a store manager, as follows:

4 Hey alma, do I have to wait til the next Friday . . . to pick up my last check?

5 The manager responded on January 18, 2015, in two text messages. The first said:

6 Hey . . . sorry I missed your calls yesterday I was moving.

7 The second said:

8 You don't have to wait till Friday to get your check we will probably have it by
9 tomorrow I'll text you n let you know . . .

10 Copies of the text messages are attached hereto as Exhibit 4. Turley received no further texts with
11 respect to the availability of her paycheck. Accordingly, she travelled to the store on January 22, 2015,
12 at which time her check was at last made available to her for pickup.

13 (14) At all relevant times mentioned herein, section 203 of the California Labor Code
14 provided:

15 If an employer willfully fails to pay, without abatement or reduction, in accordance with
16 Sections 201, 201.5, 202 and 202.5, any wages of an employee who is discharged or who
17 quits, the wages of the employee shall continue as a penalty from the due date thereof at
the same rate until paid or until action therefore is commenced; but the wages shall not
continue for more than 30 days.

18 Cal. Lab. Code § 203.

19 (15) Due to Defendant's systemic accounting inefficiencies and practice of only preparing
20 paychecks for its California employees at a remote location in Colorado, neither Turley nor other
21 employees who are discharged or quit receive timely payment of their final wages. Turley contends that
22 Defendant's failure to pay other employees or her within the time provided by section 201 and/or 202 of
23 the California Labor Code was and is "willful" within the meaning of section 203 of the California
24 Labor Code and that, accordingly, other employees and she are entitled to the continuing wages for
25 which provision is made by section 203 of the California Labor Code.

26 (16) At all relevant times mentioned herein, section 208 of the California Labor Code
27 provided:

28 Every employee who is discharged shall be paid at the place of discharge, and every
employee who quits shall be paid at the office or agency of the employer in the county

1 where the employee has been performing labor. All payments shall be made in the
2 manner provided by law.

3 Cal. Lab. Code § 208.

4 (17) At all relevant times mentioned herein, section 216 of the California Labor Code
5 provided:

6 In addition to any other penalty imposed by this article, any person, or an agent, manager,
7 superintendent, or officer thereof is guilty of a misdemeanor, who:

8 (a) Having the ability to pay, willfully refuses to pay wages due and payable after
9 demand has been made.

10 Cal. Lab. Code § 216. At all relevant times herein, Defendant Chipotle had the ability to pay Plaintiff's
11 final wages, yet it willfully refused to do so, after demand was made.

12 (18) At all relevant times mentioned herein, section 218.5 of the California Labor Code
13 provided:

14 (a) In any action brought for the nonpayment of wages, fringe benefits, or health and
15 welfare or pension fund contributions, the court shall award reasonable attorney's fees
16 and costs to the prevailing party if any party to the action requests attorney's fees and
17 costs upon the initiation of the action.

18 Cal. Lab. Code § 218.5. Plaintiff hereby demands payment of her reasonable attorney's fees and costs.

19 (19) At all relevant times mentioned herein, section 218.6 of the California Labor Code
20 provided:

21 In any action brought for the nonpayment of wages, the court shall award interest on all
22 due and unpaid wages at the rate of interest specified in subdivision (b) of Section 3289
23 of the Civil Code, which shall accrue from the date that the wages were due and payable
24 as provided in Part 1 (commencing with Section 200) of Division 2.

25 Cal. Lab. Code § 218.6.

26 (20) At all relevant times mentioned herein, section 226 of the California Labor Code provided:

27 (a) Every employer shall, semimonthly or at the time of each payment of wages,
28 furnish each of his or her employees, either as a detachable part of the check, draft, or
voucher paying the employee's wages, or separately when wages are paid by personal
check or cash, an itemized statement in writing showing (1) gross wages earned, (2) total
hours worked by the employee, except for any employee whose compensation is solely
based on a salary and who is exempt from payment of overtime under subdivision (a) of
Section 515 or any applicable order of the Industrial Welfare Commission, (3) the
number of piece-rate units earned and any applicable piece rate if the employee is paid on
a piece-rate basis, (4) all deductions, provided, that all deductions made on written orders
of the employer may be aggregated and shown as one item, (5) net wages earned, (6) the
inclusive dates of the period for which the employee is paid, (7) the name of the name of
the employee and his or her social security number, except that by January 1, 2008, only

1 the last four digits of his or her social security number or an employee identification
2 number other than a social security number may be shown on the itemized statement, (8)
3 the name and address of the legal entity that is the employer, and (9) all applicable hourly
4 rates in effect during the pay period and the corresponding number of hours worked at
5 each hourly rate by the employee. The deductions made from payments of wages shall
6 be recorded in ink or other indelible form, properly dated, showing the month, day, and
7 year, and a copy of the statement or a record of the deductions shall be kept on file by the
8 employer for at least three years at the place of employment or at a central location within
9 the State of California.

10 (b) An employer that is required by this code or any regulation adopted pursuant to
11 this code to keep the information required by subdivision (a) shall afford current and
12 former employees the right to inspect or copy records pertaining to their employment,
13 upon reasonable request to the employer. The employer may take reasonable steps to
14 ensure the identity of a current or former employee. If the employer provides copies of
15 the records, the actual cost of reproduction may be charged to the current or former
16 employee.

17 (c) An employer who receives a written or oral request to inspect or copy records
18 pursuant to subdivision (b) pertaining to a current or former employee shall comply with
19 the request as soon as practicable, but no later than 21 calendar days from the date of the
20 request. A violation of this subdivision is an infraction. Impossibility of performance, not
21 caused by or a result of a violation of law, shall be an affirmative defense for an employer
22 in any action alleging a violation of this subdivision. An employer may designate the
23 person to whom a request under this subdivision will be made.

24

25 (e) An employee suffering injury as a result of a knowing and intentional failure by an
26 employer to comply with subdivision (a) is entitled to recover the greater of all actual
27 damages or fifty dollars (\$50) for the initial pay period in which a violation occurs and
28 one hundred dollars (\$100) per employee for each violation in a subsequent pay period,
not exceeding an aggregate penalty of four thousand dollars (\$4,000), and is entitled to an
award of costs and reasonable attorney's fees.

(f) A failure by an employer to permit a current or former employee to inspect or copy
records within the time set forth in subdivision (c) entitles the current or former employee
or the Labor Commissioner to recover a seven-hundred-fifty-dollar (\$750) penalty from
the employer.

(g) The listing by an employer of the name and address of the legal entity that secured the
services of the employer in the itemized statement required by subdivision (a) shall not
create any liability on the part of that legal entity.

(h) An employee may also bring an action for injunctive relief to ensure compliance with
this section, and is entitled to an award of costs and reasonable attorney's fees.

Id. § 226.

(21) Defendants employed Plaintiff and the Class Members but failed to provide them with
the data required by section 226(a)(1), (2) or (5) of the California Labor Code. Defendants failed to
provide the total hours worked during the pay period and the corresponding number of hours worked at
each hourly rate by the employee, nor, by failing to account for tips paid to Plaintiff or other employees

1 did Defendant provide the gross and net income data required by sections 226(a)(1) and (5) of the
2 California Labor Code.

3 (22) Cal Lab. Code 1174 provides:

4 1174. Every person employing labor in this state shall:

5 . . .

6 (d) Keep, at a central location in the state or at the plants or
7 establishments at which employees are employed, payroll records
8 showing the hours worked daily by and the wages paid to, and the
9 number of piece-rate units earned by and any applicable piece rate
paid to, employees employed at the respective plants or
establishments. These records shall be kept in accordance with rules
established for this purpose by the commission, but in any case shall
be kept on file for not less than three years.

10 (23) Cal Lab. Code 1174.5 provides:

11 Any person employing labor who willfully fails to maintain the records required by . . .
12 subdivision (d) of Section 1174 . . . shall be subject to a civil penalty of five hundred
dollars (\$500).

13 (24) At all relevant times mentioned herein, California Wage Order No. 5 (as periodically
14 amended) applied to Turley and other of Defendant's employees working in its California restaurants.
15 Wage Order No. 5 provides, in pertinent part:

16 **7. RECORDS**

17 (A) Every employer shall keep accurate information with respect to each employee
18 including the following:

19 . . .

20 (3) Time records showing when the employee begins and ends each work period. Meal
periods, split shift intervals and total daily hours worked shall also be recorded. . . .

21 . . .

(5) Total hours worked in the payroll period and applicable rates of pay. This information
shall be made readily available to the employee upon reasonable request.

22 . . .

(C) All required records shall be in the English language and in ink or other indelible
form, properly dated, showing month, day and year, and shall be kept on file by the
employer for at least three years at the place of employment or at a central location within
the State of California. An employee's records shall be available for inspection by the
employee upon reasonable request.

25 . . .

11. MEAL PERIODS

26 (A) No employer shall employ any person for a work period of more than five (5) hours
27 without a meal period of not less than 30 minutes, nor more than one (1) hour. . . .

28 (B) Unless the employee is relieved of all duty during a 30 minute meal period, the meal
period shall be considered an on-duty meal period and counted as time worked. An on-

1 duty meal period shall be permitted only when the nature of the work prevents an
2 employee from being relieved of all duty and when by written agreement between the
3 parties an on-the-job paid meal period is agreed to. The written agreement shall state that
4 the employee may, in writing, revoke the agreement at any time.

5 (C) If an employer fails to provide an employee a meal period in accordance with the
6 applicable provisions of this Order, the employer shall pay the employee one (1) hour of
7 pay at the employee's regular rate of compensation for each work day that the meal
8 period is not provided.

9 (D) In all places of employment where employees are required to eat on the premises, a
10 suitable place for that purpose shall be designated.

11 **12. REST PERIODS**

12 (A) Every employer shall authorize and permit all employees to take rest periods, which
13 insofar as practicable shall be in the middle of each work period. The authorized rest
14 period time shall be based on the total hours worked daily at the rate of ten (10) minutes
15 net rest time per four (4) hours or major fraction thereof. However, a rest period need not
16 be authorized for employees whose total daily work time is less than three and one-half
17 (31/2) hours. Authorized rest period time shall be counted as hours worked for which
18 there shall be no deduction from wages.

19 (B) If an employer fails to provide an employee a rest period in accordance with the
20 applicable provisions of this Order, the employer shall pay the employee one (1) hour of
21 pay at the employee's regular rate of compensation for each work day that the rest period
22 is not provided.

23 ...

24 **20. PENALTIES**

(See Labor Code, Section 1199)

25 (A) In addition to any other civil penalties provided by law, any employer or any other
26 person acting on behalf of the employer who violates, or causes to be violated, the
27 provisions of this order, shall be subject to the civil penalty of:

28 (1) Initial Violation — \$50.00 for each underpaid employee for each pay period during
which the employee was underpaid in addition to the amount which is sufficient to
recover unpaid wages.

(2) Subsequent Violations — \$100.00 for each underpaid employee for each pay period
during which the employee was underpaid in addition to an amount which is sufficient to
recover unpaid wages.

(3) The affected employee shall receive payment of all wages recovered.

IWC Wage Order 5.

(25) The right to rest periods and meal periods has been codified in sections 226.7 and 512 of
the California Labor Code. At all relevant times mentioned herein, section 512 provided:

An employer may not employ an employee for a work period of more than five hours per
day without providing the employee with a meal period of not less than 30 minutes,
except that if the total work period per day of the employee is no more than six hours, the

1 meal period may be waived by mutual consent of both the employer and employee. An
2 employer may not employ an employee for a work period of more than 10 hours per day
3 without providing the employee with a second meal period of not less than 30 minutes,
4 except that if the total hours worked is no more than 12 hours, the second meal period
5 may be waived by mutual consent of the employer and the employee only if the first meal
6 period was not waived.

7 Cal. Lab. Code § 512(a). At all relevant times mentioned herein, section 226.7 provided:

8 If an employer fails to provide an employee a meal period or rest period in accordance
9 with an applicable order of the Industrial Welfare Commission, the employer shall pay
10 the employee one additional hour of pay at the employee's regular rate of compensation
11 for each work day that the meal or rest period is not provided.

12 Cal. Lab. Code § 226.7(b).

13 (26) Comparison of the data on Exhibit 5, reflecting the beginning and end time of Plaintiff's
14 workday, with Exhibit 1, reflecting the Plaintiff's wage statements, demonstrates that the wage
15 statements on occasion fail to reflect the total hours worked and/or that Plaintiff was not provided proper
16 meal breaks. Exhibit 5 is a copy of the Shift Detail Report for Plaintiff, 2014 to 2015.

17 (27) Defendant's practices are in violation of the California Industrial Welfare Commission
18 Order 5; California Labor Code sections 201, 202, 203; and California Business and Professions Code
19 section 17200 *et seq.* and all of the statutes and orders referenced herein. These requirements demand
20 that employers to provide their employees with timely payment of wages as well as provision of breaks
21 and information regarding their services.

22 (28) California Labor Code sections 2698 *et seq.* ("PAGA") provides for civil penalties for
23 Plaintiff and each aggrieved employee.

24 **PLAINTIFF'S CLASS-ACTION ALLEGATIONS**

25 (29) The Class represented by Plaintiff consists of all non-exempt employees who have been
26 employed by Chipotle in California during the four years prior to the filing of this Complaint through
27 the date of the filing of a Motion for Class Certification (the "Class"). Based upon the provisions of
28 Business & Professions Code section 17200 *et seq.*, Plaintiff and the Class are entitled to judgment
requiring Chipotle to pay over to Plaintiff and the Class their continuing wages and other damages and
penalties to which they are entitled. The applicable period of limitations for such an action is four years.

(30) The number of persons within each Class is believed to be in excess of 1,000. It is,
therefore, impractical to join each member of each Class as a named plaintiff. Accordingly, utilization

1 of a class action is the most economically feasible means of determining the merits of this litigation.

2 (31) Despite the numerosity of the Members of each Class, membership is readily
3 ascertainable through an examination of the records which Defendant is required by law to keep and
4 which it has kept. Likewise, the dollar amounts owed to each member of each Class are readily
5 ascertainable by an examination of the same records.

6 (32) Each Class is proper insofar as common questions of fact and of law predominate over
7 individual issues regarding the money owed to each Class Member. These common questions of law
8 and fact include, without limitation:

- 9 a. The policies and practices of Chipotle;
- 10 b. The impact of Chipotle's policies and practices on the provision of final
11 wages;
- 12 c. Whether Chipotle's denial of timely payment of final wages is an
13 unlawful, unfair or fraudulent business act or practice in violation of Business and
14 Professions Code section 17200 *et seq.*;
- 15 d. Whether Chipotle violated California Labor Code sections 201 and/or 202
16 and/or the Unfair Business Practices Act by failing to promptly pay Plaintiff and the
17 Class all wages upon termination of their employment;
- 18 e. What is the proper formula for calculating continuing wages owed to
19 Plaintiff and the Class as alleged herein;
- 20 f. Whether Chipotle provided proper breaks and data to its California
21 employees.
- 22 g. Whether Chipotle's failure to advise Plaintiff and the Class of the total
23 hours each worked during each relevant pay period violates the applicable statute and
24 Wage Order;
- 25 h. Whether Chipotle's failure to properly maintain and disclose data
26 regarding the total hours each worked during each relevant pay period violates the
27 applicable statute and Wage Order; and

28 (33) There is a well-defined community of interest in the questions of law and fact common to

1 each Plaintiff and each Class Member.

2 (34) The claims of Plaintiff are typical of the claims of the Members of each Class which all
3 arise out of the same general operative facts, i.e., Chipotle did not compensate its employees as required
4 by the California Labor Code. Plaintiff has no conflict of interest with the other Members of either
5 Class and she is able to fairly and adequately represent the interests of such persons.

6 (35) A class action is a superior method for the fair and efficient adjudication of this
7 controversy. The persons within each Class are so numerous that joinder of all of them is impracticable.
8 The disposition of all claims of the Members of each Class in a class action, rather than in individual
9 actions, will benefit the parties and the court. The interest of the class members in controlling the
10 prosecution of separate claims against Chipotle is small when compared with the efficiency of a class
11 action.

12 **FIRST CAUSE OF ACTION**

13 (Cal. Lab. Code section 203—Continuing Wages)
14 (On Behalf of Plaintiff and Each Class Member)

15 (36) Plaintiff repleads, realleges, and incorporates by reference each and every allegation set
16 forth in this Complaint.

17 (37) The Chipotle failure to compensate Plaintiff and the Class Members within the time
18 provided by sections 201 and 202 of the California Labor Code, despite Chipotle’s knowledge of its
19 obligation to do so, was “willful” within the meaning of section 203 of the California Labor Code.
20 Plaintiff and the Class Members are, therefore, entitled to continuing wages from the date on which his
21 or her wages were due until the date on which Chipotle makes payment of the wages, not to exceed
22 thirty days, restitution and damages according to proof, interest thereon, civil penalties, attorney’s fees,
23 and costs of suit.

24 **SECOND CAUSE OF ACTION**

25 (Cal. Lab. Code § 226(a), Improper Pay Stubs)
26 (On Behalf of Plaintiff and Class against Chipotle)

27 (38) Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set
28 forth in this Complaint.

(39) During the relevant times herein, Defendants knowingly and intentionally failed to
maintain records as required under California Labor Code §§ 226, 1174 and the IWC Wage Order,

1 including but not limited to the following records: total gross and net income, daily hours worked by
2 each employee and time records showing when each employee begins and ends each work period; and
3 accurate itemized statements.

4 (40) Chipotle employed Plaintiff and others but failed to provide them with the data required
5 by section 226 of the California Labor Code. For example, Defendant failed to provide information
6 regarding their total hours worked. Accordingly, Plaintiff is entitled to damages. Plaintiff and other
7 employees of Chipotle are also entitled to civil penalties, as well as to costs and attorney's fees, demand
8 for which is hereby made in accord with the provisions of the California Labor Code.

9
10 **THIRD CAUSE OF ACTION**

11 (Cal. Lab. Code § 226(b)(c) and (f), Failure to Provide Proper Response to Document Request)
12 (On Behalf of Plaintiff Only against Chipotle)

13 (41) Plaintiff re-pleads, re-alleges, and incorporates by reference each and every allegation set
14 forth in this Complaint.

15 (42) Chipotle employed Plaintiff but failed to provide her with the responsive data as required
16 by sections 226 (b), (c) and (f) of the California Labor Code. Defendant failed to provide information
17 regarding her total hours worked or total gross and net compensation. Accordingly, Plaintiff is entitled
18 to damages. Plaintiff is also entitled to civil penalties, as well as to costs and attorney's fees, demand for
19 which is hereby made in accord with the provisions of the California Labor Code.

20 (43) Pursuant to Labor Code section 226(b), an employer shall afford current and
21 former employees the right to inspect or copy the records pertaining to that current or
22 former employee, upon reasonable request to the employer.

23 (44) Plaintiff has requested that Defendant permit inspection or copying of her
24 employment records pursuant to Labor Code section 226(b). Defendant has failed to provide her with an
25 opportunity to inspect or copy all of her employment records within
26 21 days of his request, and the records which were produced failed to include any information regarding
27 alleged meal breaks or tips.

28 (45) Pursuant to Labor Code section 226(f) and (g), Plaintiff is entitled, and

1 hereby seeks to recover from Defendant a seven-hundred-fifty dollar (\$750) penalty, reasonable
2 attorney's fees, and the cost of bringing this cause of action.

3 **FOURTH CLAIM FOR RELIEF**

4 (Failure to Provide Proper Rest Periods, California Labor Code section 226.7 and IWC Wage
5 Order 16)

6 (On Behalf of Plaintiff and Class against Chipotle)

7 (46) Plaintiff repleads, realleges, and incorporates by reference each and every allegation set
8 forth in the Complaint.

9 (47) At all times herein relevant, section 226.7 of the California Labor Code and the Wage
10 Order codified in the California Code of Regulations provided that employees must receive rest periods of
11 ten minutes for each four hours of work.

12 (48) Because Defendant failed to properly provide the required rest periods, it is liable
13 to Plaintiff for one hour of additional pay at the regular rate of compensation for each workday that the
14 proper rest periods were not provided, pursuant to Labor Code section 226.7 and the California Code
15 of Regulations, for the period of time from the four years prior to the filing of the Complaint to date.
16 Plaintiff requests relief as described below.

17 **FIFTH CLAIM FOR RELIEF**

18 (Failure to Provide Proper Meal Periods, California Labor Code section 226.7 and IWC Wage Order 16)
19 (On Behalf of Plaintiff and Class against Chipotle)

20 (49) Plaintiff repleads, realleges, and incorporates by reference each and every allegation set
21 forth in the Complaint.

22 (50) At all times herein relevant, section 226.7 and 512 of the California Labor
23 Code and the Wage Order codified in the California Code of Regulations provided that employees must
24 receive meal periods of not less than thirty minutes if an employee works for a period of more than five
25 hours and a second thirty-minute meal period if an employee works for a period more than ten hours in a
26 workday.

27 (51) Because Defendant failed to properly provide the required meal periods, it is liable
28 to Plaintiff for one hour of additional pay at the regular rate of compensation for each workday that the
proper meal periods were not provided, pursuant to Labor Code section 226.7 and the California
Code of Regulations. Plaintiff requests relief as described below.

1 **SIXTH CLAIM FOR RELIEF**

2 (Disgorgement of Profits, California Bus. and Prof. Code section 17200 *et seq.*)
3 (On Behalf of Plaintiff and Class against Chipotle)

4 (52) Plaintiff repleads, realleges, and incorporates by reference each and every allegation set
5 forth in the Complaint.

6 (53) Plaintiff repleads, realleges, and incorporates by reference each and every allegation set
7 forth in this Complaint.

8 (54) Defendant is a “person” within the meaning of section 17201 of the California Business
9 and Professions Code.

10 (55) As set forth in this Complaint, Plaintiff is informed, believes, and thereon alleges that
11 Defendant intentionally and improperly has failed to comply with the California Labor Code and the
12 applicable Wage Order as hereinabove referenced and by not paying in timely fashion the full amounts
13 required to be paid to employees on account of final wages.

14 (56) Additionally, Plaintiff is informed, believes, and thereon alleges that Defendant was able
15 to compete unfairly by not complying with the California Labor Code and the applicable Wage Order.

16 (57) By competing unfairly, Defendants have gained a competitive advantage over other
17 comparable businesses in the State of California, avoiding the substantial accounting expense it would
18 incur by properly accounting for tips distributed to employees such as Plaintiff.

19 (58) Accordingly, Defendant’s failure to comply with the California Labor Code and the
20 applicable Wage Order is an unfair and/or unlawful business activity prohibited by section 17200 *et seq.*
21 of the California Business and Professions Code, and it justifies the payment to other employees of
22 wages owing to them, disgorgement of profits and other relief pursuant to section 17203 of the
23 California Business and Professions Code. All remedies are cumulative pursuant to section 17205 of the
24 California Business and Professions Code.

25 (59) Furthermore, Plaintiff requests attorney’s fees and costs pursuant to section 1021.5 of the
26 California Code of Civil Procedure upon proof that she has acted in the public interest.

27 ///

28 ///

1 **SEVENTH CAUSE OF ACTION**

2 (Cal. Lab. Code § 2698 *et seq* Civil Penalties Under the Private Attorney General Act)
3 (On Behalf of Plaintiff and Class against Chipotle)

4 (60) Plaintiff repleads, realleges, and incorporates by reference each and every allegation set
5 forth in the Complaint.

6 (61) Pursuant to California Labor Code section 2699.3(a)(1), on March 27, 2015, Plaintiff
7 gave written notice by certified mail to the Labor and Workforce Development Agency (“LWDA”) and
8 Defendant Chipotle through its registered agent for service of process, of the specific provisions of the
9 California Labor Code alleged to have been violated by Defendant Chipotle, including the facts and
10 theories specified in the original complaint. A copy of the letter is reproduced herein as Exhibit 6. A
11 copy of the confirmation of the certified proof of delivery, which was received by the LWDA on April
12 1, 2015, is attached hereto as Exhibit 7.

13 (62) At all relevant times herein, California Labor Code section 2699.3(a)(2)(A) provided:

14 The agency shall notify the employer and the aggrieved employee or representative by
15 certified mail that it does not intend to investigate the alleged violation within 30 calendar
16 days of the postmark date of the notice received pursuant to paragraph (1). Upon receipt
17 of that notice or if no notice is provided within 33 calendar days of the postmark date of
18 the notice given pursuant to paragraph (1), the aggrieved employee may commence a
19 civil action pursuant to Section 2699.

20 Cal. Lab. Code § 2699.3(a)(2)(A).

21 (63) More than thirty-three days have passed since Plaintiff mailed the March 27, 2015, letter
22 to the LWDA. As of the filing of this First Amended Complaint, no notice has been provided by the
23 LWDA. Accordingly, Plaintiff may commence a civil action pursuant to section 2699 as a matter of
24 right. See Cal. Lab. Code 2699.3(a)(2)(C).

25 (64) Section 2699(f) of the California Labor Code provides for civil penalties for violations of
26 the California Labor Code, for which a specific civil penalty is not provided and for civil penalties for
27 violations of the applicable Industrial Welfare Commission Wage Order. Section 2699(a) provides that
28 civil penalties may be “recovered through a civil action brought by an aggrieved employee on behalf of
himself or herself and other current or former employees.” Cal. Lab. Code § 2699(a). Section 2699(g)

1 provides that an employee who prevails in a civil action under section 2699 shall be entitled to an award
2 of reasonable attorneys' fees and costs.

3 (65) The State of California and Plaintiff Turley, and Class Members are, therefore, entitled to
4 civil penalties, attorneys' fees, and costs according to proof.

5 **WHEREFORE, Plaintiff prays judgment as follows:**

6 (1) That this Court certify the Classes as requested;

7 (2) With respect to the First Cause of Action (Cal. Lab. Code sections 201, 202, and 203—
8 Timely Payment of Final Wages), that this Court enter judgment in favor of Plaintiff and the Class
9 Members in an amount according to proof, including civil penalties, interest thereon, attorney's fees, and
10 costs of suit;

11 (3) With respect to the Second Cause of Action (Cal. Lab. Code section 226(a).—Deficient
12 Wage Statements, that this Court enter judgment in favor of Plaintiff and the Class Members in an
13 amount according to proof, interest thereon, attorney's fees, and costs of suit;

14 (4) With respect to the Third Cause of Action (Cal. Lab. Code section 226(b)—Failure to
15 Properly Respond to Request to Inspect Records, that this Court enter judgment in favor of Plaintiff in
16 the amount of \$750 or otherwise according to proof, interest thereon, attorney's fees, and costs of suit;

17 (5) With respect to the Fourth Cause of Action (Cal. Lab. Code section 226.7—Failure to
18 Properly Provide Rest Breaks, that this Court enter judgment in favor of Plaintiff and the Class Members
19 in an amount according to proof, interest thereon, attorney's fees, and costs of suit;

20 (6) With respect to the Fifth Cause of Action (Cal. Lab. Code section 226.7—Failure to Properly
21 Provide Meal Breaks, that this Court enter judgment in favor of Plaintiff and the Class Members in an
22 amount according to proof, interest thereon, attorney's fees, and costs of suit;

23 (7) With respect to the Sixth Cause of Action (Cal. Bus. & Prof. Code section 17200 *et seq.*—
24 Disgorgement of Profits), that this Court enter judgment in favor of Plaintiff and the putative Class
25 Members in an amount according to proof, interest thereon, attorney's fees, and costs of suit;


26 (8) With respect to the Seventh Cause of Action (Cal. Lab. Code § 2698 *et seq.*—Civil Penalties
27 Under the Private Attorney General Act), that this Court enter judgment in favor of Plaintiff and the
28 putative Class Members in an amount according to proof, interest thereon, attorney's fees, and costs of

1 suit; and

2 (9) For such other relief as the Court may order, including attorneys fees and costs, provision of
3 which is made by section 218.5 of the California Labor Code. Plaintiff requests a trial by jury as to all
4 claims for relief.

5
6 DATED: July 22 2015

HARRIS & RUBLE
NORTH BAY LAW GROUP



Alan Harris
David S. Harris
Attorney for Plaintiff

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EXHIBIT 1

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 07/14/2014
 Pay End Date: 07/27/2014

Business Unit: 09011
 Check #: 000000003578574
 Check Date: 08/01/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M 2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.: Addl. Amt.: 56.00
	Pay Rate: \$12.000000 Hourly	
	Overtime Rt: \$18.000000 Hourly Dbltime Rt: \$24.000000 Hourly Previous Rt: \$10.750000 Hourly	

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	70.30	843.60	570.08	6,840.96	Fed Withholding	96.16	820.05
Overtime @ 1.5	18.000000	0.02	0.36	8.51	153.18	Fed MED/EE	12.24	102.81
Sick			0.00	8.00	96.00	Fed OASDI/EE	52.32	439.59
						CA Withholding	68.11	561.15
						CA OASDI/EE	8.44	70.90
Total:		70.32	843.96	586.59	7,090.14	Total:	237.27	1,994.50

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 843.96	843.96	237.27	0.00	606.69
YTD: 7,090.14	7,090.14	1,994.50	0.00	5,095.64

NET PAY DISTRIBUTION	
Check #000000003578574	606.69
Total:	606.69

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver CO 80202

56-1544/441 JP MORGAN CHASE BANK, N.A.
 Columbus, OH

Check No.
 3578574

Date: 08/01/2014

Pay Amount: \$606.69 *****

Pay ****SIX HUNDRED SIX AND 69/100 DOLLARS****

Void After 180 Days

To The
 Order Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

abcdef

C3578574C A044115443A

693194326C

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 05/05/2014
 Pay End Date: 05/18/2014

Business Unit: 09011
 Advice #: 000000003190090
 Advice Date: 05/23/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.: 56.00
	Pay Rate: \$12.000000 Hourly	Addl. Amt.: 56.00
	Overtime Rt: \$18.000000 Hourly	
	Dbtime Rt: \$24.000000 Hourly	
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current Hours	Earnings	YTD Hours	Earnings	Description	Current	YTD
Regular Pay	12.000000	69.58	834.96	69.58	834.96	Fed Withholding	96.24	96.24
Overtime @ 1.5	18.000000	0.53	9.54	0.53	9.54	Fed MED/EE	12.25	12.25
						Fed OASDI/EE	52.36	52.36
						CA Withholding	68.13	68.13
						CA OASDI/EE	8.45	8.45
Total:		70.11	844.50	70.11	844.50	Total:	237.43	237.43

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

	TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current:	844.50	844.50	237.43	0.00	607.07
YTD:	844.50	844.50	237.43	0.00	607.07

NET PAY DISTRIBUTION	
Advice #000000003190090	607.07
Total:	607.07

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 05/23/2014

Advice No.
 3190090

Deposit Amount: \$607.07

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Paycard	XXXXXXXX9380	607.07
Total:		607.07

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 05/19/2014
 Pay End Date: 06/01/2014

Business Unit: 09011
 Advice #: 000000003227945
 Advice Date: 06/06/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-McCreon	Marital Status: Single S/M-2 inc
	Location: McCreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.:
	Pay Rate: \$12.000000 Hourly	Addl. Amt.: 56.00
	Overtime Rt: \$18.000000 Hourly	
	Dbltime Rt: \$24.000000 Hourly	
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current Hours	Earnings	YTD Hours	Earnings	Description	Current	YTD
Regular Pay	12.000000	77.20	926.40	222.19	2,666.28	Fed Withholding	112.85	315.61
Overtime @ 1.5	18.000000	1.60	28.80	2.58	46.44	Fed MED/EE	13.85	39.33
						Fed OASDI/EE	59.22	168.19
						CA Withholding	73.00	212.27
						CA OASDI/EE	9.55	27.13
Total:		78.80	955.20	224.77	2,712.72	Total:	268.47	762.53

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	55.67	111.34			
Total:	0.00	0.00	Total:	55.67	111.34	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 955.20	955.20	268.47	55.67	631.06
YTD: 2,712.72	2,712.72	762.53	111.34	1,838.85

NET PAY DISTRIBUTION	
Advice #000000003227945	631.06
Total:	631.06

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 06/06/2014

Advice No.
 3227945

Deposit Amount: \$631.06

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: McCreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Paycard	XXXXXXXX9380	631.06
Total:		631.06

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 06/02/2014
 Pay End Date: 06/15/2014

Business Unit: 09011
 Advice #: 000000003266097
 Advice Date: 06/20/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Adtl. Pct.:
	Pay Rate: \$12.000000 Hourly	Adtl. Amt.: 56.00
	Overtime Rt: \$18.000000 Hourly	
	Dbltime Rt: \$24.000000 Hourly	
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS					TAXES			
Description	Rate	Current Hours	Earnings	YTD Hours	Earnings	Description	Current	YTD
Regular Pay	12.000000	75.41	904.92	223.19	2,666.28	Fed Withholding	106.52	315.61
Overtime @ 1.5	18.000000	0.45	8.10	2.58	46.44	Fed MED/EE	13.23	39.33
						Fed OASDI/EE	56.61	168.19
						CA Withholding	71.14	212.27
						CA OASDI/EE	9.13	27.13
Total:		75.86	913.02	224.77	2,712.72	Total:	256.63	762.53

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	55.67	111.34			
Total:	0.00	0.00	Total:	55.67	111.34	Total:		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 913.02	913.02	256.63	55.67	600.72
YTD: 2,712.72	2,712.72	762.53	111.34	1,838.85

NET PAY DISTRIBUTION	
Advice #000000003266097	600.72
Total:	600.72

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 06/20/2014

Advice No.
 3266097

Deposit Amount: \$600.72

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Paycard	XXXXXXXX9380	600.72
Total:		600.72

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group:	CHA-Hourly Group A	Business Unit:	09011
Pay Begin Date:	06/16/2014	Advice #:	000000003304705
Pay End Date:	06/29/2014	Advice Date:	07/03/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID:	334618	TAX DATA:	Federal	CA State
	Department:	1400000-Metreon	Marital Status:	Single	S/M-2 inc
	Location:	Metreon	Allowances:	0	0
	Job Title:	Cashier	Addl. Pct.:		
	Pay Rate:	\$12.000000 Hourly	Addl. Amt.:		56.00
	Overtime Rt:	\$18.000000 Hourly			
	Dbltime Rt:	\$24.000000 Hourly			
	Previous Rt:	\$10.750000 Hourly			

HOURS AND EARNINGS						TAXES		
Description	Rate	Current Hours	Earnings	YTD Hours	YTD Earnings	Description	Current	YTD
Regular Pay	12.000000	76.24	914.88	363.13	4,357.56	Fed Withholding	107.96	509.81
Overtime @ 1.5	18.000000	0.43	7.74	3.09	55.62	Fed MED/EE	13.38	63.99
						Fed OASDI/EE	57.20	273.62
						CA Withholding	71.57	350.44
						CA OASDI/EE	9.22	44.13
Total:		76.67	922.62	366.22	4,413.18	Total:	259.33	1,241.99

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	111.34	0.00			
Total:	0.00	0.00	Total:	111.34	0.00			

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 922.62	922.62	259.33	111.34	774.63
YTD: 4,413.18	4,413.18	1,241.99	0.00	3,171.19

NET PAY DISTRIBUTION	
Advice #000000003304705	774.63
Total:	774.63

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 07/03/2014

Advice No.
 3304705

Deposit Amount: \$774.63

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Paycard	XXXXXXXX9380	774.63
Total:		774.63

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A	Business Unit: 09011
Pay Begin Date: 06/30/2014	Advice #: 000000003343557
Pay End Date: 07/13/2014	Advice Date: 07/18/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Add. Pct.: Addl. Amt.: 56.00
	Pay Rate: \$12.000000 Hourly	
	Overtime Rt: \$18.000000 Hourly	
	Dbtime Rt: \$24.000000 Hourly	
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	64.70	776.40	363.13	4,357.56	Fed Withholding	86.24	509.81
Overtime @ 1.5	18.000000	0.08	1.44	3.09	55.62	Fed MED/EE	11.28	63.99
						Fed OASDI/EE	48.23	273.62
						CA Withholding	66.60	350.44
						CA OASDI/EE	7.78	44.13
Total:		64.78	777.84	366.22	4,413.18	Total:	220.13	1,241.99

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 777.84	777.84	220.13	0.00	557.71
YTD: 4,413.18	4,413.18	1,241.99	0.00	3,171.19

NET PAY DISTRIBUTION	
Advice #000000003343557	557.71
Total:	557.71

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 07/18/2014

Advice No.
 3343557

Deposit Amount: 557.71

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Paycard	XXXXXXXX9380	557.71
Total:		557.71

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 07/28/2014
 Pay End Date: 08/10/2014

Business Unit: 09011
 Advice #: 000000003424319
 Advice Date: 08/15/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.: Addl. Amt.: 56.00
	Pay Rate: \$12.000000 Hourly	
	Overtime Rt: \$18.000000 Hourly Dbltime Rt: \$24.000000 Hourly Previous Rt: \$10.750000 Hourly	

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	66.77	801.24	570.08	6,840.96	Fed Withholding	104.15	820.05
Sick	12.000000	8.00	96.00	8.00	96.00	Fed MED/EE	13.01	102.81
Overtime @ 1.5			0.00	8.51	153.18	Fed OASDI/EE	55.63	439.59
						CA Withholding	70.45	561.15
						CA OASDI/EE	8.97	70.90
Total:		74.77	897.24	586.59	7,090.14	Total:	252.21	1,994.50

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		
TOTAL GROSS			FED TAXABLE GROSS			TOTAL TAXES		
Current:	897.24		897.24		252.21	0.00		645.03
YTD:	7,090.14		7,090.14		1,994.50	0.00		5,095.64

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	2.2
- Taken:	8.0
End Balance:	5.8

NET PAY DISTRIBUTION	
Advice #000000003424319	645.03
Total:	645.03

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 08/15/2014

Advice No.
 3424319

Deposit Amount: \$645.03

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	645.03
Total:		645.03

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 08/11/2014
 Pay End Date: 08/24/2014

Business Unit: 09011
 Advice #: 00000003463193
 Advice Date: 08/29/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.:
	Pay Rate: \$12.000000 Hourly	Addl. Amt: 56.00
	Overtime Rt: \$18.000000 Hourly	
Dbltime Rt: \$24.000000 Hourly		
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	69.88	838.56	570.08	6,840.96	Fed Withholding	109.93	820.05
Overtime @ 1.5	18.000000	5.40	97.20	8.51	153.18	Fed MED/EE	13.57	102.81
Sick			0.00	8.00	96.00	Fed OASDI/EE	58.02	439.59
						CA Withholding	72.15	561.15
						CA OASDI/EE	9.36	70.90
Total:		75.28	935.76	586.59	7,090.14	Total:	263.03	1,994.50

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 935.76	935.76	263.03	0.00	672.73
YTD: 7,090.14	7,090.14	1,994.50	0.00	5,095.64

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	4.7
- Taken:	8.0
End Balance:	3.3

NET PAY DISTRIBUTION	
Advice #00000003463193	672.73
Total:	672.73

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 08/29/2014

Advice No.
 3463193

Deposit Amount: \$672.73

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	672.73
Total:		672.73

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 08/25/2014
 Pay End Date: 09/07/2014

Business Unit: 09011
 Advice #: 00000003501238
 Advice Date: 09/12/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID:	334618	TAX DATA:	Federal	CA State
	Department:	1460000-Metreon	Marital Status:	Single	S/M-2 inc
	Location:	Metreon	Allowances:	0	0
	Job Title:	Cashier	Adtl. Pct.:		
	Pay Rate:	\$12.000000 Hourly	Adtl. Amt.:		56.00
	Overtime Rt:	\$18.000000 Hourly			
Dbltime Rt:	\$24.000000 Hourly				
Previous Rt:	\$10.750000 Hourly				

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	52.69	632.28	688.91	8,266.92	Fed Withholding	75.87	1,013.70
Overtime @ 1.5	18.000000	3.95	71.10	12.89	232.02	Fed MED/EE	10.20	127.41
Sick			0.00	24.00	288.00	Fed OASDI/EE	43.61	544.79
						CA Withholding	64.96	700.79
						CA OASDI/EE	7.04	87.87
Total:		56.64	703.38	725.80	8,786.94	Total:	200.88	2,474.56

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		
TOTAL GROSS			FED TAXABLE GROSS			TOTAL TAXES		
Current:	703.38		703.38			200.88	0.00	502.50
YTD:	8,786.94		8,786.94			2,474.56	0.00	6,312.38

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	6.6
- Taken:	24.0
End Balance:	17.4

NET PAY DISTRIBUTION	
Advice #00000003501238	502.50
Total:	502.50

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 09/12/2014

Advice No.
 3501238

Deposit Amount: \$502.50

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590
 Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	502.50
Total:		502.50

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 09/08/2014
 Pay End Date: 09/21/2014

Business Unit: 09011
 Advice #: 000000003538875
 Advice Date: 09/26/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal	CA State
	Department: 1460000-Metreon	Marital Status: Single	S/M-2 inc
	Location: Metreon	Allowances: 0	0
	Job Title: Cashier	Addl. Pct.:	
	Pay Rate: \$12.000000 Hourly	Addl. Amt.:	56.00
	Overtime Rt: \$18.000000 Hourly		
	Dbltime Rt: \$24.000000 Hourly		
	Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	66.14	793.68	688.91	8,266.92	Fed Withholding	118.58	1,013.70
Overtime @ 1.5	18.000000	0.43	7.74	12.89	232.02	Fed MED/EE	14.40	127.41
Sick	12.000000	16.00	192.00	24.00	288.00	Fed OASDI/EE	61.59	544.79
						CA Withholding	74.68	700.79
						CA OASDI/EE	9.93	87.87

Total:		82.57	993.42	725.80	8,786.94	Total:	279.18	2,474.56
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BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			

Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		
TOTAL GROSS			FED TAXABLE GROSS			TOTAL TAXES		
Current:	993.42		993.42			279.18	0.00	714.24
YTD:	8,786.94		8,786.94			2,474.56	0.00	6,312.38

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	8.8
- Taken:	24.0
End Balance:	15.2

NET PAY DISTRIBUTION	
Advice #000000003538875	714.24
Total:	714.24

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 09/26/2014

Advice No.
 3538875

Deposit Amount: \$714.24

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590
 Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	714.24
Total:		714.24

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 09/22/2014
 Pay End Date: 10/05/2014

Business Unit: 09011
 Advice #: 000000003576777
 Advice Date: 10/10/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.: Addl. Amt.: 56.00
	Pay Rate: \$12.000000 Hourly	
	Overtime Rt: \$18.000000 Hourly Dbltime Rt: \$24.000000 Hourly Previous Rt: \$10.750000 Hourly	

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	56.96	683.52	802.07	9,624.84	Fed Withholding	72.47	1,159.33
Overtime @ 1.5	18.000000	0.14	2.52	13.93	250.74	Fed MED/EE	9.95	147.37
Sick			0.00	24.00	288.00	Fed OASDI/EE	42.53	630.14
						CA Withholding	64.58	830.05
						CA OASDI/EE	6.86	101.64
Total:		57.10	686.04	840.00	10,163.58	Total:	196.39	2,868.53

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

	TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current:	686.04	686.04	196.39	0.00	489.65
YTD:	10,163.58	10,163.58	2,868.53	0.00	7,295.05

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	10.7
- Taken:	24.0
End Balance:	13.3

NET PAY DISTRIBUTION	
Advice #000000003576777	489.65
Total:	489.65

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 10/10/2014

Advice No.
 3576777

Deposit Amount: \$489.65

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	489.65
Total:		489.65

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A	Business Unit: 09011
Pay Begin Date: 10/06/2014	Advice #: 000000003615005
Pay End Date: 10/19/2014	Advice Date: 10/24/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.: Addl. Amt.: 56.00
	Pay Rate: \$12.000000 Hourly	
	Overtime Rt: \$18.000000 Hourly	
	Dbltime Rt: \$24.000000 Hourly	
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	56.20	674.40	802.07	9,624.84	Fed Withholding	73.16	1,159.33
Overtime @ 1.5	18.000000	0.90	16.20	13.93	250.74	Fed MED/EE	10.01	147.37
Sick			0.00	24.00	288.00	Fed OASDI/EE	42.82	630.14
						CA Withholding	64.68	830.05
						CA OASDI/EE	6.91	101.64
Total:		57.10	690.60	840.00	10,163.58	Total:	197.58	2,868.53

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 690.60	690.60	197.58	0.00	493.02
YTD: 10,163.58	10,163.58	2,868.53	0.00	7,295.05

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	12.6
- Taken:	24.0
End Balance:	11.4

NET PAY DISTRIBUTION	
Advice #000000003615005	493.02
Total:	493.02

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 10/24/2014

Advice No.
 3615005

Deposit Amount: \$493.02

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	493.02
Total:		493.02

NON-NEGOTIABLE

Chipotle Services, LLC

1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 10/20/2014
 Pay End Date: 11/02/2014

Business Unit: 09011
 Advice #: 000000003653477
 Advice Date: 11/07/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.:
	Pay Rate: \$12.000000 Hourly	Addl. Amt.: 56.00
	Overtime Rt: \$18.000000 Hourly	
	Dbtime Rt: \$24.000000 Hourly Previous Rt: \$10.750000 Hourly	

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.000000	73.76	885.12	934.53	11,220.23	Fed Withholding	110.06	1,346.97
Overtime @ 1.5	18.000000	2.86	51.48	17.33	312.02	Fed MED/EE	13.58	171.39
Sick			0.00	24.00	288.00	Fed OASDI/EE	58.07	732.86
						CA Withholding	72.18	967.56
						CA OASDI/EE	9.36	118.20
Total:		76.62	936.60	975.86	11,820.25	Total:	263.25	3,336.98

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	Total:	0.00	0.00

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 936.60	936.60	263.25	0.00	673.35
YTD: 11,820.25	11,820.25	3,336.98	0.00	8,483.27

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	15.2
- Taken:	24.0
End Balance:	8.8

NET PAY DISTRIBUTION	
Advice #000000003653477	673.35
Total:	673.35

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 11/07/2014

Advice No.
 3653477

Deposit Amount: \$673.35

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	673.35
Total:		673.35

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 11/03/2014
 Pay End Date: 11/16/2014

Business Unit: 09011
 Advice #: 000000003692129
 Advice Date: 11/21/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.:
	Pay Rate: \$12.100000 Hourly	Addl. Amt.: 56.00
	Overtime Rt: \$18.150000 Hourly Dbltime Rt: \$24.200000 Hourly Previous Rt: \$10.750000 Hourly	

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.100000	58.70	710.27	934.53	11,220.23	Fed Withholding	77.58	1,346.97
Overtime @ 1.5	18.150000	0.54	9.80	17.33	312.02	Fed MED/EE	10.44	171.39
Sick			0.00	24.00	288.00	Fed OASDI/EE	44.65	732.86
						CA Withholding	65.33	967.56
						CA OASDI/EE	7.20	118.20
Total:		59.24	720.07	975.86	11,820.25	Total:	205.20	3,336.98

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	0.00	0.00	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 720.07	720.07	205.20	0.00	514.87
YTD: 11,820.25	11,820.25	3,336.98	0.00	8,483.27

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	17.2
- Taken:	24.0
End Balance:	6.8

NET PAY DISTRIBUTION	
Advice #000000003692129	514.87
Total:	514.87

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 11/21/2014

Advice No.
 3692129

Deposit Amount: \$514.87

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	514.87
Total:		514.87

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A	Business Unit: 09011
Pay Begin Date: 11/17/2014	Advice #: 000000003731227
Pay End Date: 11/30/2014	Advice Date: 12/05/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal CA State
	Department: 1460000-Metreon	Marital Status: Single S/M-2 inc
	Location: Metreon	Allowances: 0 0
	Job Title: Cashier	Addl. Pct.: 56.00
	Pay Rate: \$12.100000 Hourly	Addl. Amt.: 56.00
Overtime Rt: \$18.150000 Hourly		
Dbltime Rt: \$24.200000 Hourly		
Previous Rt: \$10.750000 Hourly		

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.100000	29.00	350.90	1,110.89	13,354.19	Fed Withholding	27.13	1,599.50
Overtime @ 1.5	18.150000	0.38	6.90	24.62	444.34	Fed MED/EE	5.19	204.25
Sick			0.00	24.00	288.00	Fed OASDI/EE	22.18	873.36
Health Care W2 Reporting			0.00		577.06	CA Withholding	56.00	1,169.47
						CA OASDI/EE	3.58	140.87
Total:		29.38	357.80	1,159.51	14,086.53	Total:	114.08	3,987.45

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Hourly Medical	0.00	0.00			
			Garnishment-Tax Levy	0.00	343.02			
Total:	0.00	0.00	Total:	0.00	343.02	* Taxable		

TOTAL GROSS	FED TAXABLE GROSS	TOTAL TAXES	TOTAL DEDUCTIONS	NET PAY
Current: 357.80	357.80	114.08	0.00	243.72
YTD: 14,086.53	14,086.53	3,987.45	343.02	9,756.06

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	18.1
- Taken:	24.0
End Balance:	5.9

NET PAY DISTRIBUTION	
Advice #000000003731227	243.72
Total:	243.72

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 12/05/2014

Advice No.
 3731227

Deposit Amount: \$243.72

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	243.72
Total:		243.72

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 12/01/2014
 Pay End Date: 12/14/2014

Business Unit: 09011
 Advice #: 000000003778388
 Advice Date: 12/19/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal	CA State
	Department: 1460000-Metreon	Marital Status: Single	S/M-2 inc
	Location: Metreon	Allowances: 0	0
	Job Title: Cashier	Addl. Pct.:	
	Pay Rate: \$12.100000 Hourly	Addl. Amt.:	56.00
	Overtime Rt: \$18.150000 Hourly		
Dbtime Rt: \$24.200000 Hourly			
Previous Rt: \$10.750000 Hourly			

HOURS AND EARNINGS						TAXES		
Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.100000	71.11	860.43	1,110.89	13,354.19	Fed Withholding	103.04	1,599.50
Overtime @ 1.5	18.150000	1.62	29.41	24.62	444.34	Fed MED/EE	12.90	204.25
Sick			0.00	24.00	288.00	Fed OASDI/EE	55.17	873.36
Health Care W2 Reporting			0.00		577.06	CA Withholding	70.12	1,169.47
						CA OASDI/EE	8.90	140.87
Total:		72.73	889.84	1,159.51	14,086.53	Total:	250.13	3,987.45

BEFORE-TAX DEDUCTIONS			AFTER-TAX DEDUCTIONS			EMPLOYER PAID BENEFITS		
Description	Current	YTD	Description	Current	YTD	Description	Current	YTD
			Garnishment-Tax Levy	159.93	343.02			
			Hourly Medical	0.00	0.00			
Total:	0.00	0.00	Total:	159.93	343.02	* Taxable		
TOTAL GROSS			FED TAXABLE GROSS			TOTAL TAXES		
Current:	889.84		889.84		250.13	159.93		479.78
YTD:	14,086.53		14,086.53		3,987.45	343.02		9,756.06

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	20.6
- Taken:	24.0
End Balance:	3.4

NET PAY DISTRIBUTION	
Advice #000000003778388	479.78
Total:	479.78

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 12/19/2014

Advice No.
 3778388

Deposit Amount: \$479.78

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	479.78
Total:		479.78

NON-NEGOTIABLE

Chipotle Services, LLC
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 303/595-4000

Pay Group: CHA-Hourly Group A
 Pay Begin Date: 12/15/2014
 Pay End Date: 12/28/2014
 Business Unit: 09011
 Advice #: 000000003817636
 Advice Date: 12/31/2014

Tanika Elaine Turley 926 Georgia Street Apt. A Vallejo, CA 94590	Employee ID: 334618	TAX DATA: Federal	CA State
	Department: 1460000-Metreon	Marital Status: Single	S/M-2 inc
	Location: Metreon	Allowances: 0	0
	Job Title: Cashier	Adtl. Pct.:	
	Pay Rate: \$12.100000 Hourly	Adtl. Amt.:	56.00
Overtime Rt: \$18.150000 Hourly			
Dbltime Rt: \$24.200000 Hourly			
Previous Rt: \$10.750000 Hourly			

HOURS AND EARNINGS

TAXES

Description	Rate	Current		YTD		Description	Current	YTD
		Hours	Earnings	Hours	Earnings			
Regular Pay	12.100000	76.25	922.63	1,110.89	13,354.19	Fed Withholding	122.36	1,599.50
Overtime @ 1.5	18.150000	5.29	96.01	24.62	444.34	Fed MED/EE	14.77	204.25
Sick			0.00	24.00	288.00	Fed OASDI/EE	63.15	873.36
Health Care W2 Reporting			0.00		577.06	CA Withholding	75.79	1,169.47
						CA OASDI/EE	10.19	140.87

Total:	81.54	1,018.64	1,159.51	14,086.53	Total:	286.26	3,987.45
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BEFORE-TAX DEDUCTIONS

AFTER-TAX DEDUCTIONS

EMPLOYER PAID BENEFITS

Description	Current		YTD		Description	Current		YTD	
					Garnishment-Tax Levy		183.09		343.02
					Hourly Medical		0.00		0.00

Total:	0.00	0.00	Total:	183.09	343.02	* Taxable
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TOTAL GROSS

FED TAXABLE GROSS

TOTAL TAXES

TOTAL DEDUCTIONS

NET PAY

Current:	1,018.64	1,018.64	286.26	183.09	549.29
YTD:	14,086.53	14,086.53	3,987.45	343.02	9,756.06

SICK HOURS	YTD
Start Balance:	0.0
+ Earned:	23.3
- Taken:	24.0
End Balance:	0.7

NET PAY DISTRIBUTION	
Advice #000000003817636	549.29
Total:	549.29

MESSAGE:

Chipotle Services, LLC
 1401 Wynkoop Street
 Suite 500
 Denver, CO 80202
 303/595-4000

Date
 12/31/2014

Advice No.
 3817636

Deposit Amount: \$549.29

To The
 Account(s) Of

TANIKA ELAINE TURLEY
 926 Georgia Street Apt. A
 Vallejo, CA 94590

Location: Metreon

DIRECT DEPOSIT DISTRIBUTION		
Account Type	Account Number	Deposit Amount
Checking	XX7522	549.29
Total:		549.29

NON-NEGOTIABLE

Chipotle Services, LLC 1401 Wynkoop Street Suite 500 Denver, CO 80202 +1 (303) 595-4000

Name	Company	Employee ID	Pay Period Begin	Pay Period End	Check Date	Check Number
Tanika Turley	Chipotle Services, LLC	0334618	12/29/2014	01/11/2015	01/16/2015	

	Gross Pay	Pre Tax Deductions	Employee Taxes	Post Tax Deductions	Net Pay
Current	752.38	0.00	212.08	0.00	540.30
YTD	752.38	0.00	212.08	0.00	540.30

Earnings						Employee Taxes		
Description	Dates	Hours	Rate	Amount	YTD	Description	Amount	YTD
Regular Hry	12/29/2014-01/11/2015	61.07	12.1	738.95	738.95	OASDI	46.65	46.65
Overtime	01/05/2015-01/11/2015	0.74	18.15	13.43	13.43	Medicare	10.91	10.91
						Federal Withholding	81.85	81.85
						State Tax - CA	65.90	65.90
						CA SDI - CASDI	6.77	6.77
Earnings								
				752.38	752.38	Employee Taxes		
						212.08		212.08

Taxable Wages		
Description	Amount	YTD
OASDI - Taxable Wages	752.38	752.38
Medicare - Taxable Wages	752.38	752.38
Federal Withholding - Taxable Wages	752.38	752.38

Marital Status	Federal		State	Sick Accrual			
	Single	Single or Married (with two or more incomes)		Description	Accrued	Reduced	Available
Allowances	0	0	0	Bi-Weekly Sick Plan	2.06	0	2.06
Additional Withholding	0	56					

Payment Information				
Bank	Account Name	Account Number	USD Amount	Payment Amount
Bank Account	Bank Account *****5221	*****5221	540.30	USD

Chipotle Services, LLC 1401 Wynkoop Street Suite 500 Denver, CO 80202 +1 (303) 595-4000

Name	Company	Employee ID	Pay Period Begin	Pay Period End	Check Date	Check Number
Tanika Turley	Chipotle Services, LLC	0334618	01/12/2015	01/25/2015	01/17/2015	3700943

	Gross Pay	Pre Tax Deductions	Employee Taxes	Post Tax Deductions	Net Pay
Current	174.18	0.00	81.63	0.00	92.55
YTD	926.56	0.00	293.71	0.00	632.85

Earnings						Employee Taxes		
Description	Dates	Hours	Rate	Amount	YTD	Description	Amount	YTD
Regular Hrlly	01/12/2015-01/16/2015	12.38	12.1	149.80	888.75	OASDI	10.80	57.45
Overtime	01/12/2015-01/16/2015	0.55	18.15	9.98	23.41	Medicare	2.53	13.44
Vac PayOut	01/12/2015-01/16/2015	1.19	12.1	14.40	14.40	Federal Withholding	10.73	92.58
						State Tax - CA	56.00	121.90
						CA SDI - CASDI	1.57	8.34
Earnings								
					174.18	926.56		
						Employee Taxes	81.63	293.71

Taxable Wages		
Description	Amount	YTD
OASDI - Taxable Wages	174.18	926.56
Medicare - Taxable Wages	174.18	926.56
Federal Withholding - Taxable Wages	174.18	926.56

Marital Status	Federal		State	Sick Accrual			
	Single	Single or Married (with two or more incomes)		Description	Accrued	Reduced	Available
Allowances	0		0	Bi-Weekly Sick Plan	0	0	-5.94
Additional Withholding	0		56				

Payment Information				
Bank	Account Name	Account Number	USD Amount	Payment Amount
(Check)			92.55	USD

Chipotle Services, LLC 1401 Wyrkoop Street Suite 500 Denver, CO 80202 +1 (303) 595-4000

Name	Company	Employee ID	Pay Period Begin	Pay Period End	Check Date	Check Number
Tanika Turley	Chipotle Services, LLC	0334616	01/26/2015	02/08/2015	02/03/2015	

	Gross Pay	Pre Tax Deductions	Employee Taxes	Post Tax Deductions	Net Pay
Current	52.40	0.00	52.40	0.00	0.00
YTD	978.96	0.00	346.11	0.00	632.85

Earnings						Employee Taxes		
Description	Dates	Hours	Rate	Amount	YTD	Description	Amount	YTD
Regular Hrly	01/26/2015-02/08/2015	4.33	12.1	52.40	941.15	OASDI	3.25	60.70
Overtime					23.41	Medicare	0.75	14.19
Vac PayOut					14.40	Federal Withholding	0.00	92.58
						State Tax - CA	47.93	169.83
						CA SDI - CASDI	0.47	6.81
Earnings				52.40	978.96	Employee Taxes	52.40	346.11

Taxable Wages			
Description	Amount	YTD	
OASDI - Taxable Wages	52.40	978.96	
Medicare - Taxable Wages	52.40	978.96	
Federal Withholding - Taxable Wages	52.40	978.96	

	Federal	State
Marital Status	Single	Single or Married (with two or more incomes)
Allowances	0	0
Additional Withholding	0	56

Payment Information				
Bank	Account Name	Account Number	USD Amount	Payment Amount
(Check)			0.00	USD

EXHIBIT 2

April 3, 2015

VIA FEDEX

Harris & Ruble
4771 Cromwell Ave
Los Angeles, CA 90027
Attn: Alan Harris

**RE: Tanika Turley/ Chipotle Mexican Grill, Inc.
Employment Records Request**

Dear Mr. Harris,

This law firm represents Chipotle Mexican Grill, Inc.'s ("Chipotle") Custodian of Records with regards to the request for records you have issued for Tanika Turley. Please find attached copies of the requested information. The enclosed documents are courtesy copies that do not need to be returned.

All medical records for Chipotle employees are retained by ESIS, and must be obtained through them. ESIS accepts all written correspondence at the following address:

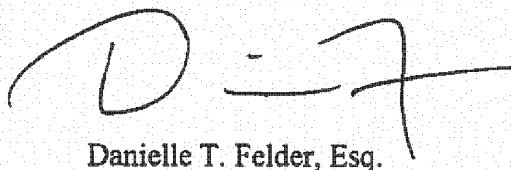
ESIS West WC Claims
P.O. Box 6569
Scranton, PA 18505-6569

ESIS requests that you include the claim number on each document. This will help speed up processing.

Should you have any concerns or questions, please do not hesitate to contact me.

Very truly yours,

MESSNER REEVES LLP



Danielle T. Felder, Esq.

DTF/gt

HARRIS & RUBLE

ATTORNEYS AND COUNSELORS AT LAW

SOUTHERN CALIFORNIA OFFICE:

4771 CROMWELL AVE.
LOS ANGELES, CA 90027
TELEPHONE: 323.962.3777
FAX: 323.962.3004
www.harrisandruble.com

ALAN HARRIS
MARCELLA RUBLE*

PRIYA MOHAN**
DAVID GARRETT**
REBECCA LEE**
CHRISTINA PEACOCK***

*ADMITTED IN ILLINOIS ONLY
**ADMITTED IN CALIFORNIA ONLY
***ADMITTED IN SWEDEN ONLY

March 9, 2015

Chipotle Mexican Grill, Inc.
c/o Registered Agent for Service of Process
National Registered Agents, Inc.
818 W. Seventh St.
Los Angeles CA 90017

Re: Tanika Turley

We represent Tanika Turley. This letter constitutes her demand, pursuant to section 1198.5 of the California Labor Code, for her personnel file, including without limitation her Sign-In Sheets and Group Timecards, as well as any other documents Chipotle Mexican Grill Inc., maintains regarding her performance or any grievance concerning the employee.

Very truly yours,


Alan Harris

cc: Chipotle Mexican Grill, Inc., 1401 Wynkoop Street, Suite 500, Denver CO 80202

NORTHERN CALIFORNIA OFFICE:

116 E. BLITHEDALE AVE SUITE 2
MILL VALLEY, CA 94941
TELEPHONE: 415.388.8788
FAX: 415.388.8770

TANIKA ELAINE TURLEY
75 Dore Street, Apt. 223
San Francisco, CA 94103

VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED

March 5, 2015

Chipotle Services, LLC
Attn: Human Resources and/or Legal Department
1401 Wynkoop Street, Suite 500
Denver, CO 80202

Re: My Employment at Chipotle Services, LLC

Dear Human Resources and/or Counsel:

Pursuant to Section 226 of the California Labor Code and the applicable regulation, as adopted by the Industrial Welfare Commission, I am requesting that Chipotle Services, LLC promptly furnish to me my complete employee record, including, but not limited to: "(1) The itemized statements referred to in Section 226 (a); (2) The statement of total hours worked; (3) All deductions taken from gross pay; (4) Net wages earned; (5) The name and address of the legal entity who or which is the employer; (6) All applicable hourly rates in effect during the pay period and the corresponding number of hours worked at each hourly rate by the employee; and (7) time records showing when the employee begins and ends each work period [including] [meal] periods, split shift intervals and total daily hours worked." I am requesting these documents from the beginning of my employment to the present. This request includes, but is not limited to, copies of my entire employment file, including but not limited to any documents I signed during the course of my employment, as well as all paystubs, timecard reports which include all time punched in and punched out, my weekly schedules, any employee reviews or disciplinary write-ups, and any employee handbook(s). In addition, to the extent that any changes were made to my timecards (i.e., the time I punched in and out), please provide records of the original time data as well as the changes that were made.

Please send all responsive documents and have all further communications with my attorney: David S. Harris, North Bay Law Group, 116 E. Blithedale Avenue, Suite 2, Mill Valley, CA 94941; telephone number: (415) 388-8788; fax number: (415) 388-8770. Please provide the requested documents within 30 days of this written request. Please give this request your prompt attention and response. I invite your attention to the provisions of the statute providing for certain penalties in the event of failure to honor requests such as this.

Truly yours,

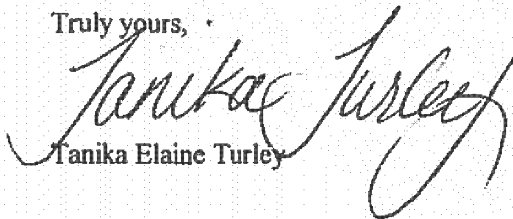

Tanika Elaine Turley

EXHIBIT 3

tanika turley

View Event Terminate: Tanika Turley (Terminated)

For Tanika Turley (Terminated)
Overall Process Terminate: Tanika Turley (Terminated)
Overall Status Successfully Completed
Due Date 01/16/2015

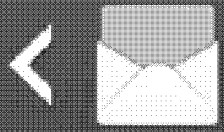
Details **Process**

Employee Tanika Turley
Position P0334618 Cashier
Termination Date 01/16/2015
Reason Termination > a - Unacceptable Work Performance
Close Position

Additional Information

Secondary Reasons (empty)
Last Day of Work 01/15/2015
Pay Through Date 01/18/2015
Resignation Date (empty)
Notify By 01/16/2015
Recommended Minimum Notification Date 01/16/2015
Regrettable

EXHIBIT 4

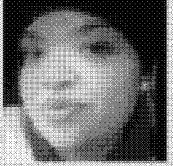


Alma
19254354651



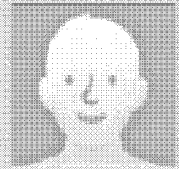
01/17/2015 Sat

Hey alma, do I have to wait til the next Friday Chipotle gets paid to pick up my last check?



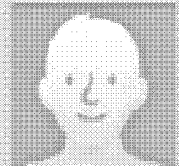
8:29 PM

01/18/2015 Sun



Hey tanik sorry I missed your calls yesterday I was moving

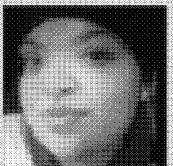
2:09 PM



You don't have to wait till Friday to get your check we will probably have it by tomorrow I'll text you n let you know k

2:10 PM

Ok. Thank you



2:12 PM

Enter message



EXHIBIT 5

Shift Detail For: Tanika Turley

Date Of Business	Store Id	Store Name	Employee Number	In Hour	In Minute	Out Hour	Out Minute	Total Minutes	Total Hours	Rate	Pay Edited By
12/31/2014	1460	Metreon - 1460	334618	10	45	16	16	331.2	5.52	\$12.10	\$66.79
12/30/2014	1460	Metreon - 1460	334618	15	29	23	23	474	7.9	\$12.10	\$95.59
12/29/2014	1460	Metreon - 1460	334618	15	31	23	10	459	7.65	\$12.10	\$92.57
12/28/2014	1460	Metreon - 1460	334618	8	4	13	25	321	5.35	\$12.10	\$64.74
12/27/2014	1460	Metreon - 1460	334618	7	59	16	4	484.8	8.08	\$12.10	\$98.25
12/24/2014	1460	Metreon - 1460	334618	9	15	16	11	415.8	6.93	\$12.10	\$83.85
12/23/2014	1460	Metreon - 1460	334618	8	0	16	4	484.2	8.07	\$12.10	\$98.07
12/22/2014	1460	Metreon - 1460	334618	11	45	19	43	478.2	7.97	\$12.10	\$96.44
12/21/2014	1460	Metreon - 1460	334618	8	1	16	17	496.2	8.27	\$12.10	\$111.63
12/20/2014	1460	Metreon - 1460	334618	8	0	16	14	493.8	8.23	\$12.10	\$100.97
12/19/2014	1460	Metreon - 1460	334618	17	45	23	3	318	5.3	\$12.10	\$64.13
12/17/2014	1460	Metreon - 1460	334618	8	15	19	15	660	11	\$12.10	\$151.25
12/16/2014	1460	Metreon - 1460	334618	8	1	15	32	451.2	7.52	\$12.10	\$90.99
12/15/2014	1460	Metreon - 1460	334618	11	45	16	34	289.2	4.82	\$12.10	\$58.32
12/14/2014	1460	Metreon - 1460	334618	11	14	19	4	469.8	7.83	\$12.10	\$94.74
12/13/2014	1460	Metreon - 1460	334618	11	13	19	10	477	7.95	\$12.10	\$96.20
12/10/2014	1460	Metreon - 1460	334618	10	45	15	48	303	5.05	\$12.10	\$61.11
12/09/2014	1460	Metreon - 1460	334618	8	0	16	44	523.8	8.73	\$12.10	\$110.05
12/08/2014	1460	Metreon - 1460	334618	10	55	19	26	510.6	8.51	\$12.10	\$106.06
12/07/2014	1460	Metreon - 1460	334618	11	45	16	13	268.2	4.47	\$12.10	\$54.09
12/05/2014	1460	Metreon - 1460	334618	10	44	19	7	502.8	8.38	\$12.10	\$103.70
12/04/2014	1460	Metreon - 1460	334618	10	44	15	58	313.8	5.23	\$12.10	\$63.28
12/03/2014	1460	Metreon - 1460	334618	10	49	16	51	361.8	6.03	\$12.10	\$72.96
12/02/2014	1460	Metreon - 1460	334618	10	0	15	43	343.2	5.72	\$12.10	\$69.21
12/01/2014	1460	Metreon - 1460	334618	10	0	14	50	289.8	4.83	\$12.10	\$58.44
11/30/2014	1460	Metreon - 1460	334618	11	15	19	20	484.8	8.08	\$12.10	\$98.25
11/29/2014	1460	Metreon - 1460	334618	17	45	22	55	310.2	5.17	\$12.10	\$62.56
11/18/2014	1460	Metreon - 1460	334618	8	2	16	20	498	8.3	\$12.10	\$102.25
11/17/2014	1460	Metreon - 1460	334618	8	1	15	51	469.8	7.83	\$12.10	\$94.74
11/14/2014	1460	Metreon - 1460	334618	7	58	13	0	301.8	5.03	\$12.10	\$60.86
11/13/2014	1460	Metreon - 1460	334618	8	0	15	32	451.8	7.53	\$12.10	\$91.11
11/12/2014	1460	Metreon - 1460	334618	8	12	10	2	109.8	1.83	\$12.10	\$22.14
11/10/2014	1460	Metreon - 1460	334618	7	59	15	49	469.8	7.83	\$12.10	\$94.74
11/07/2014	1460	Metreon - 1460	334618	7	58	13	8	310.2	5.17	\$12.10	\$62.56
11/06/2014	1460	Metreon - 1460	334618	8	15	13	44	328.8	5.48	\$12.10	\$66.31
11/05/2014	1460	Metreon - 1460	334618	7	56	16	13	497.4	8.29	\$12.10	\$102.06
11/04/2014	1460	Metreon - 1460	334618	7	58	15	45	466.8	7.78	\$12.10	\$94.14
11/03/2014	1460	Metreon - 1460	334618	8	0	16	15	495	8.25	\$12.10	\$101.34
11/01/2014	1460	Metreon - 1460	334618	8	0	16	2	482.4	8.04	\$12.00	\$96.72
10/31/2014	1460	Metreon - 1460	334618	8	0	17	41	580.8	9.68	\$12.00	\$126.24
10/29/2014	1460	Metreon - 1460	334618	8	14	13	15	301.2	5.02	\$12.00	\$60.24
10/28/2014	1460	Metreon - 1460	334618	8	0	16	9	489	8.15	\$12.00	\$98.70
10/27/2014	1460	Metreon - 1460	334618	7	59	15	55	475.8	7.93	\$12.00	\$95.16
10/25/2014	1460	Metreon - 1460	334618	15	30	23	49	499.2	8.32	\$12.00	\$101.76
10/24/2014	1460	Metreon - 1460	334618	8	0	16	18	498	8.3	\$12.00	\$101.40
10/22/2014	1460	Metreon - 1460	334618	8	14	13	10	295.8	4.93	\$12.00	\$59.16

Shift Detail For: Tanika Turley

10/21/2014	1460 Metreon - 1460	334618	8	0	16	22	502.2	8.37	\$12.00	\$102.66
10/20/2014	1460 Metreon - 1460	334618	7	59	15	52	472.8	7.88	\$12.00	\$94.56
10/17/2014	1460 Metreon - 1460	334618	15	26	23	24	478.2	7.97	\$12.00	\$95.64
10/16/2014	1460 Metreon - 1460	334618	15	30	23	29	478.8	7.98	\$12.00	\$95.76
10/15/2014	1460 Metreon - 1460	334618	15	26	0	20	534	8.9	\$12.00	\$112.20
10/14/2014	1460 Metreon - 1460	334618	8	14	14	15	361.2	6.02	\$12.00	\$72.24
10/13/2014	1460 Metreon - 1460	334618	8	15	13	32	316.8	5.28	\$12.00	\$63.36
10/10/2014	1460 Metreon - 1460	334618	17	45	22	30	285	4.75	\$12.00	\$57.00
10/09/2014	1460 Metreon - 1460	334618	17	45	23	14	328.8	5.48	\$12.00	\$65.76
10/08/2014	1460 Metreon - 1460	334618	8	15	13	21	306	5.1	\$12.00	\$61.20
10/07/2014	1460 Metreon - 1460	334618	17	45	23	22	337.2	5.62	\$12.00	\$67.44
10/03/2014	1460 Metreon - 1460	334618	15	30	19	11	220.8	3.68	\$12.00	\$44.16
10/02/2014	1460 Metreon - 1460	334618	15	32	23	0	448.2	7.47	\$12.00	\$89.64
10/01/2014	1460 Metreon - 1460	334618	9	15	14	9	294	4.9	\$12.00	\$58.80
09/30/2014	1460 Metreon - 1460	334618	15	30	22	43	433.2	7.22	\$12.00	\$86.64
09/29/2014	1460 Metreon - 1460	334618	15	32	23	4	451.8	7.53	\$12.00	\$90.36
09/26/2014	1460 Metreon - 1460	334618	15	30	20	38	307.8	5.13	\$12.00	\$61.56
09/25/2014	1460 Metreon - 1460	334618	15	19	23	27	488.4	8.14	\$12.00	\$98.52
09/24/2014	1460 Metreon - 1460	334618	9	15	14	14	298.8	4.98	\$12.00	\$59.76
09/23/2014	1460 Metreon - 1460	334618	15	31	23	30	478.8	7.98	\$12.00	\$95.76
09/20/2014	1460 Metreon - 1460	334618	15	32	23	29	477	7.95	\$12.00	\$95.40
09/19/2014	1460 Metreon - 1460	334618	15	30	23	3	453	7.55	\$12.00	\$90.60
09/17/2014	1460 Metreon - 1460	334618	15	30	23	56	505.8	8.43	\$12.00	\$103.74
09/16/2014	1460 Metreon - 1460	334618	9	15	13	41	265.8	4.43	\$12.00	\$53.16
09/12/2014	1460 Metreon - 1460	334618	15	30	23	7	457.2	7.62	\$12.00	\$91.44
09/11/2014	1460 Metreon - 1460	334618	15	30	22	47	436.8	7.28	\$12.00	\$87.36
09/10/2014	1460 Metreon - 1460	334618	15	30	23	21	471	7.85	\$12.00	\$94.20
09/09/2014	1460 Metreon - 1460	334618	15	31	23	0	448.8	7.48	\$12.00	\$89.76
09/08/2014	1460 Metreon - 1460	334618	15	30	23	29	478.8	7.98	\$12.00	\$95.76
09/06/2014	1460 Metreon - 1460	334618	15	9	19	52	283.2	4.72	\$12.00	\$56.64
09/03/2014	1460 Metreon - 1460	334618	15	27	23	25	478.2	7.97	\$12.00	\$95.64
08/30/2014	1460 Metreon - 1460	334618	15	30	23	51	501	8.35	\$12.00	\$123.90
08/29/2014	1460 Metreon - 1460	334618	15	30	23	16	466.2	7.77	\$12.00	\$93.24
08/28/2014	1460 Metreon - 1460	334618	15	30	23	2	451.8	7.53	\$12.00	\$90.36
08/27/2014	1460 Metreon - 1460	334618	10	45	15	30	285	4.75	\$12.00	\$57.00
08/26/2014	1460 Metreon - 1460	334618	15	30	23	6	456	7.6	\$12.00	\$91.20
08/25/2014	1460 Metreon - 1460	334618	15	30	23	27	477	7.95	\$12.00	\$95.40
08/22/2014	1460 Metreon - 1460	334618	15	30	18	56	205.8	3.43	\$12.00	\$41.16
08/21/2014	1460 Metreon - 1460	334618	15	30	19	15	225	3.75	\$12.00	\$45.00
08/20/2014	1460 Metreon - 1460	334618	15	31	23	0	448.8	7.48	\$12.00	\$89.76
08/19/2014	1460 Metreon - 1460	334618	15	30	23	14	463.8	7.73	\$12.00	\$92.76
08/18/2014	1460 Metreon - 1460	334618	15	31	22	41	430.2	7.17	\$12.00	\$86.04
08/17/2014	1460 Metreon - 1460	334618	16	4	23	20	436.2	7.27	\$12.00	\$118.14
08/15/2014	1460 Metreon - 1460	334618	15	30	23	45	495	8.25	\$12.00	\$100.50
08/14/2014	1460 Metreon - 1460	334618	15	30	23	5	454.8	7.58	\$12.00	\$90.96
08/13/2014	1460 Metreon - 1460	334618	15	31	23	5	454.2	7.57	\$12.00	\$90.84
08/12/2014	1460 Metreon - 1460	334618	15	30	23	21	471	7.85	\$12.00	\$94.20

Shift Detail For: Tanika Turley

08/11/2014	1460 Metreon - 1460	334618	15	30	22	23	412.8	6.88	\$12.00	\$82.56
08/09/2014	1460 Metreon - 1460	334618	15	28	23	28	480	8	\$12.00	\$96.00
08/07/2014	1460 Metreon - 1460	334618	15	30	23	4	454.2	7.57	\$12.00	\$90.84
08/06/2014	1460 Metreon - 1460	334618	15	33	23	5	451.8	7.53	\$12.00	\$90.36
08/04/2014	1460 Metreon - 1460	334618	15	30	23	24	474	7.9	\$12.00	\$94.80
08/02/2014	1460 Metreon - 1460	334618	15	30	23	2	451.8	7.53	\$12.00	\$90.36
07/31/2014	1460 Metreon - 1460	334618	15	32	20	16	283.8	4.73	\$12.00	\$56.76
07/30/2014	1460 Metreon - 1460	334618	15	30	23	22	472.2	7.87	\$12.00	\$94.44
07/29/2014	1460 Metreon - 1460	334618	15	30	23	28	478.2	7.97	\$12.00	\$95.64
07/28/2014	1460 Metreon - 1460	334618	15	30	23	10	460.2	7.67	\$12.00	\$92.04
07/26/2014	1460 Metreon - 1460	334618	15	30	21	15	345	5.75	\$12.00	\$69.00
07/24/2014	1460 Metreon - 1460	334618	15	30	23	6	456	7.6	\$12.00	\$91.20
07/23/2014	1460 Metreon - 1460	334618	15	30	23	6	456	7.6	\$12.00	\$91.20
07/22/2014	1460 Metreon - 1460	334618	15	32	23	5	453	7.55	\$12.00	\$90.60
07/21/2014	1460 Metreon - 1460	334618	17	48	22	9	261	4.35	\$12.00	\$52.20
07/19/2014	1460 Metreon - 1460	334618	15	30	22	8	397.8	6.63	\$12.00	\$79.56
07/18/2014	1460 Metreon - 1460	334618	15	30	23	7	457.2	7.62	\$12.00	\$91.44
07/17/2014	1460 Metreon - 1460	334618	15	30	23	8	457.8	7.63	\$12.00	\$91.56
07/16/2014	1460 Metreon - 1460	334618	15	30	23	31	481.2	8.02	\$12.00	\$96.36
07/15/2014	1460 Metreon - 1460	334618	15	30	23	4	454.2	7.57	\$12.00	\$90.84
07/12/2014	1460 Metreon - 1460	334618	15	30	22	34	424.2	7.07	\$12.00	\$84.84
07/11/2014	1460 Metreon - 1460	334618	15	30	23	23	472.8	7.88	\$12.00	\$94.56
07/10/2014	1460 Metreon - 1460	334618	15	30	23	22	472.2	7.87	\$12.00	\$94.44
07/09/2014	1460 Metreon - 1460	334618	15	31	23	21	469.8	7.83	\$12.00	\$93.96
07/08/2014	1460 Metreon - 1460	334618	15	30	23	7	457.2	7.62	\$12.00	\$91.44
07/05/2014	1460 Metreon - 1460	334618	16	0	22	8	367.8	6.13	\$12.00	\$73.56
07/03/2014	1460 Metreon - 1460	334618	15	30	22	55	445.2	7.42	\$12.00	\$89.04
07/01/2014	1460 Metreon - 1460	334618	15	30	23	35	484.8	8.08	\$12.00	\$97.44
06/30/2014	1460 Metreon - 1460	334618	17	45	22	38	292.8	4.88	\$12.00	\$58.56
06/28/2014	1460 Metreon - 1460	334618	15	31	23	42	490.8	8.18	\$12.00	\$99.24
06/27/2014	1460 Metreon - 1460	334618	15	31	23	45	493.8	8.23	\$12.00	\$100.14
06/26/2014	1460 Metreon - 1460	334618	15	31	22	31	420	7	\$12.00	\$84.00
06/25/2014	1460 Metreon - 1460	334618	15	30	23	28	478.2	7.97	\$12.00	\$95.64
06/24/2014	1460 Metreon - 1460	334618	15	30	23	13	463.2	7.72	\$12.00	\$92.64
06/21/2014	1460 Metreon - 1460	334618	15	30	22	1	391.2	6.52	\$12.00	\$78.24
06/20/2014	1460 Metreon - 1460	334618	15	30	23	31	481.2	8.02	\$12.00	\$96.36
06/19/2014	1460 Metreon - 1460	334618	15	30	23	7	457.2	7.62	\$12.00	\$91.44
06/18/2014	1460 Metreon - 1460	334618	15	30	23	23	472.8	7.88	\$12.00	\$94.56
06/17/2014	1460 Metreon - 1460	334618	15	30	23	2	451.8	7.53	\$12.00	\$90.36
06/14/2014	1460 Metreon - 1460	334618	15	30	23	1	451.2	7.52	\$12.00	\$90.24
06/12/2014	1460 Metreon - 1460	334618	15	31	23	39	487.8	8.13	\$12.00	\$98.34
06/11/2014	1460 Metreon - 1460	334618	15	30	23	49	499.2	8.32	\$12.00	\$101.76
06/10/2014	1460 Metreon - 1460	334618	15	30	23	23	472.8	7.88	\$12.00	\$94.56
06/09/2014	1460 Metreon - 1460	334618	15	30	23	1	451.2	7.52	\$12.00	\$90.24
06/08/2014	1460 Metreon - 1460	334618	17	22	22	44	322.2	5.37	\$12.00	\$64.44
06/05/2014	1460 Metreon - 1460	334618	15	21	23	19	478.2	7.97	\$12.00	\$95.64
06/04/2014	1460 Metreon - 1460	334618	15	30	22	59	448.8	7.48	\$12.00	\$89.76

Shift Detail For: Tanika Turley

06/03/2014	1460 Metreon - 1460	334618	15	30	23	25	475.2	7.92	\$12.00	\$95.04
06/02/2014	1460 Metreon - 1460	334618	15	30	23	15	465	7.75	\$12.00	\$93.00
05/31/2014	1460 Metreon - 1460	334618	15	30	23	26	475.8	7.93	\$12.00	\$103.68
05/30/2014	1460 Metreon - 1460	334618	17	15	22	21	306	5.1	\$12.00	\$61.20
05/29/2014	1460 Metreon - 1460	334618	10	45	15	45	300	5	\$12.00	\$60.00
05/28/2014	1460 Metreon - 1460	334618	15	30	23	8	457.8	7.63	\$12.00	\$91.56
05/27/2014	1460 Metreon - 1460	334618	15	30	23	17	466.8	7.78	\$12.00	\$93.36
05/26/2014	1460 Metreon - 1460	334618	15	31	23	30	478.8	7.98	\$12.00	\$95.76
05/24/2014	1460 Metreon - 1460	334618	15	30	23	24	474	7.9	\$12.00	\$94.80
05/22/2014	1460 Metreon - 1460	334618	15	30	23	23	472.8	7.88	\$12.00	\$94.56
05/21/2014	1460 Metreon - 1460	334618	15	26	23	3	457.2	7.62	\$12.00	\$91.44
05/20/2014	1460 Metreon - 1460	334618	15	30	23	41	490.8	8.18	\$12.00	\$99.24
05/19/2014	1460 Metreon - 1460	334618	17	21	23	9	348	5.8	\$12.00	\$69.60
05/18/2014	1460 Metreon - 1460	334618	15	29	23	31	481.8	8.03	\$12.00	\$96.54
05/17/2014	1460 Metreon - 1460	334618	15	30	23	44	493.8	8.23	\$12.00	\$100.14
05/16/2014	1460 Metreon - 1460	334618	15	30	23	46	496.2	8.27	\$12.00	\$100.86
05/15/2014	1460 Metreon - 1460	334618	15	30	23	23	472.8	7.88	\$12.00	\$94.56
05/14/2014	1460 Metreon - 1460	334618	15	30	23	3	453	7.55	\$12.00	\$90.60
05/11/2014	1460 Metreon - 1460	334618	15	28	23	5	457.2	7.62	\$12.00	\$91.44
05/10/2014	1460 Metreon - 1460	334618	15	30	23	6	456	7.6	\$12.00	\$91.20
05/09/2014	1460 Metreon - 1460	334618	15	29	22	56	447	7.45	\$12.00	\$89.40
05/08/2014	1460 Metreon - 1460	334618	15	31	23	0	448.8	7.48	\$12.00	\$89.76
01/15/2015	1460 Metreon - 1460	334618	11	45	16	5	259.8	4.33	\$12.10	\$52.39
01/14/2015	1460 Metreon - 1460	334618	6	20	8	3	103.2	1.72	\$12.10	\$20.81
01/14/2015	1460 Metreon - 1460	334618	16	0	22	50	409.8	6.83	\$12.10	\$85.97
01/12/2015	1460 Metreon - 1460	334618	11	45	16	8	262.8	4.38	\$12.10	\$53.00
01/11/2015	1460 Metreon - 1460	334618	11	45	16	15	270	4.5	\$12.10	\$57.18
01/10/2015	1460 Metreon - 1460	334618	15	30	23	39	489	8.15	\$12.10	\$99.52
01/09/2015	1460 Metreon - 1460	334618	15	30	23	37	487.2	8.12	\$12.10	\$98.98
01/08/2015	1460 Metreon - 1460	334618	15	30	23	31	481.2	8.02	\$12.10	\$97.16
01/07/2015	1460 Metreon - 1460	334618	8	0	15	55	475.2	7.92	\$12.10	\$95.83
01/05/2015	1460 Metreon - 1460	334618	16	0	20	2	241.8	4.03	\$12.10	\$48.76

EXHIBIT 6

NORTH BAY
LAW GROUP

VIA CERTIFIED MAIL

March 27, 2015

David Lanier
California Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814

Re: Tanika Turley v. Chipotle Services, LLC
San Francisco County Superior Court Case #CGC-15-544936

Secretary Lanier:

Pursuant to the applicable provisions of the California Labor Code Private Attorneys General Act, Plaintiff Tanika Turley hereby alleges with respect to her employment with Defendant Chipotle Services, LLC, that Defendant violated provisions of the California Labor Code and the applicable Industrial Welfare Commission Wage Order(s). Specifically, Plaintiff alleges that Defendant violated, without limitation, sections 201, 202, 203 and 2698 *et seq.*, of the California Labor Code, Wage Order 5 of the Industrial Welfare Commission, and section 17200 of the California Business & Professions Code. The facts and circumstances concerning the alleged violations are outlined in the Complaint, which is enclosed with this correspondence.

Please advise whether you will proceed with an investigation of this matter or whether Plaintiff may seek civil-penalty recovery for the alleged violations of the California Labor Code, Industrial Welfare Commission Wage Order(s) under the Labor Code Private Attorneys General Act and California Business & Professions Code through their private counsel.

Very truly yours,



David S. Harris

Enclosure

CC: (with enclosure) via certified mail to: Chipotle Services, LLC, Attn: Human Resources and/or Legal Department, 1401 Wynkoop Street, Suite 500, Denver, CO 80202

DAVID S. HARRIS, ATTORNEY AT LAW
BRIAN T. FLAHAVAN, OF COUNSEL

EXHIBIT 7

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

David Lanier
CALIF. LABOR &
WORKFORCE DEVELOPMENT
AGENCY
800 Capitol Mall, MIC-55
Sacramento, CA 95814

2. Article Number

(Transfer from service label)

7014 2870 0002 0910 5435

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

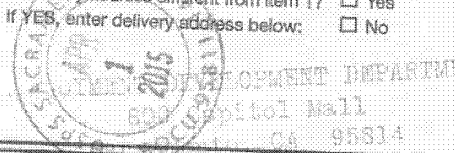
Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No



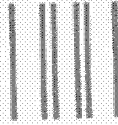
3. Service Type

- Certified Mail®
- Registered
- Insured Mail
- Priority Mail Express™
- Return Receipt for Merchandise
- Collect on Delivery

4. Restricted Delivery? (Extra Fee)

Yes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

* Sender: Please print your name, address, and ZIP+4® in this box*

North Bay Law Group
116 E. Blithedale Ave., Suite No. 2
Mill Valley, CA 94941

Turley