NO. 1029225

SUPREME COURT OF WASHINGTON

Department of Labor and Industries,

Petitioner-Plaintiff,

v.

Cannabis Green, LLC, et al.

Defendants-Respondents.

BRIEF OF AMICI CURIAE FAIR WORK CENTER/ WORKING WASHINGTON, WASHINGTON EMPLOYMENT LAWYES ASSOCIATION, AND NATIONAL EMPLOYMENT LAW PROJECT.

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I. IDENTITIES AND INTERESTS OF AMICI

The identities and interests of Amici are set out in the accompanying motion for leave to file this brief. The Fair Work Center and Working Washington (FWC/WW) are statewide, nonprofit, nonpartisan organizations dedicated to building worker power and to assisting low-wage workers in understanding and enforcing their workplace rights. Many of the workers that FWC/WW represent in legal proceedings and organize with must rely on the actions of L&I to have any hope of recovering stolen wages. These organizations have direct experience with workers navigating those processes and suffering the ill effects of the poor recordkeeping by their employers.

The Washington Employment Lawyers Association (WELA) is a chapter of the National Employment Lawyers Association. WELA is comprised of approximately 200 attorneys admitted to practice law in the State of Washington. WELA advocates in favor of employee rights, including

employee's access to administrative remedies for wage violations.

The National Employment Law Project is a non-profit legal organization with over 50 years of experience advocating for the employment and labor rights of low-wage and unemployed workers. NELP's areas of expertise include workplace rights under federal and state employment and labor laws, with a special emphasis on wage and hour rights. NELP partners with community-based worker centers and other worker groups across the country, and through these partnerships and our research, knows firsthand the high rates of wage and hour violations in low-wage industries, the barriers workers face in trying to vindicate their rights, and the importance of strong public enforcement to achieve compliance.

II. STATEMENT OF THE CASE

Amici adopt Petitioner's Statement of the Case.

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III. ARGUMENT

A. This Court should reverse the Court of Appeals' decision because there is a substantial public interest in interpreting RCW 49.48.040(1) consistent with its broad remedial purpose and to prevent wage theft.

1. Wage theft is rampant, especially in low-wage industries like retail.

Companies often commit wage and hour violations in low-wage industries. A landmark study surveying more than 4,000 workers across 3 major U.S. cities found that 26 percent of workers were not paid the applicable minimum wage, 76 percent were not paid overtime, and 70 percent suffered from "off-the-clock" violations by not being compensated for all hours worked, among other violations.[1] Another study updating and extrapolating these datapoints nationwide found that workers lost

[1] ANNETTE BERNHARDT ET AL., BROKEN LAWS, UNPROTECTED WORKERS: VIOLATIONS OF EMPLOYMENT AND LABOR LAWS IN AMERICA'S CITIES 2-3 (2009), https://www.nelp.org/app/uploads/2015/03/BrokenLawsReport2009.pdf.

more than $50 billion to wage theft nationwide in 2016.[2] Retail, like the businesses operated by Cannabis Green, is one of the leading industries where employers commit wage violations.[3]

Wage theft in Washington State follows national trends. For example, a report by *amicus* Fair Work Center/Working Washington from 2022 found that "an estimated 3 in 10 low-wage workers in King County experienced minimum wage violations between 2009 and 2019, depriving them of a sixth of their minimum wages, on average. As in the rest of the nation, immigrants, women, and people of color were much more likely to be affected."[4]

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[2] CELINE MCNICHOLAS, ZANE MOKHIBER, & ADAM CHAIKOF, TWO BILLION DOLLARS IN STOLEN WAGES WERE RECOVERED FOR WORKERS IN 2015 AND 2016—AND THAT'S JUST A DROP IN THE BUCKET 3 (2017), https://files.epi.org/pdf/138995.pdf.

[3] AMY TRAUB, THE STEAL: THE URGENT NEED TO COMBAT WAGE THEFT IN RETAIL 2 (2017), https://www.demos.org/sites/default/files/publications/The%20Steal%20-%20Retail%20Wage%20Theft.pdf.

[4] NEIL DAMRON, MARTIN GARFINKEL, DANIELLE ALVARADO, & DANIEL GALVIN, PH.D., WAGE THEFT IN KING COUNTY: ANALYSIS AND RECOMMENDATIONS FOR IMPROVING LABOR

Wage theft for low wage workers has real consequences. "For workers making low or minimum wages, losing this much income often means falling into poverty…[I]n a study commissioned by the U.S. Department of Labor, the authors found that minimum wage violations increased poverty rates among workers who experienced wage theft."[5] These outcomes of unmitigated wage theft not only pose significant consequences to the workers who are directly impacted, but to the broader economy.[6]

2. Effective enforcement of Washington wage law depends on the Washington Department of Labor and Industries ("L&I") having full authority to initiate actions without first pre-determining the precise damages owed.

STANDARDS ENFORCEMENT 4 (2022), https://www.fairworkcenter.org/wp-content/uploads/2024/07/FWC-King-County-Wage-Theft-Study.pdf.

[5] *Id*. at 10.

[6] *Id.* at 12.

Washington was one of the first states in the nation to pass a minimum wage law, decades before the adoption of the federal Fair Labor Standards Act (FLSA).[7] This early law, predating the Minimum Wage Requirements and Labor Standards Act,[8] (now known as the Minimum Wage Act, or "MWA") was upheld as a valid attempt by the state to protect the health, safety, and general welfare of its people.[9]

When the MWA was eventually enacted, the Washington Legislature recognized that a minimum wage was "a subject of vital and imminent concern to the people of this state."[10] As this Court has repeatedly recognized, "[c]onsistent with

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[7] William P. Quigley, *A Fair Day's Pay for A Fair Day's Work: Time to Raise and Index the Minimum Wage*, 27 St. Mary's L.J. 513, 515 (1996), https://commons.stmarytx.edu/thestmaryslawjournal/vol27/iss3/2.

[8] RCW 49.46.

[9] *Parrish v. W. Coast Hotel Co.*, 185 Wn. 581, 587, 55 P.2d 1083 (1936), *aff'd*, 300 U.S. 379, 57 S. Ct. 578 (1937) (overturning, *inter alia*, *Lochner v. New York*, 198 U.S. 45, 25 S. Ct. 539 (1905)).

[10] RCW 49.46.005(1).

Washington's priority of protecting employee rights, courts must liberally construe the MWA in favor of the employee."[11]

L&I enforces these critical wage and hour laws on behalf of employees under the Collection of Wages in Private Employment Act (CWPEA).[12] L&I's role under the CWPEA is essential to effectuating the purpose of the MWA because of the daunting barriers workers face in trying to privately assert their rights to be properly paid for their work.

First, low-wage workers face well-documented and well-founded fears of retaliation by their employers that discourage them from coming forward on their own. One national study of low-wage workers found that 43 percent of workers who complained about workplace violations were retaliated against—including being fired, suspended, or threatened with cuts in their

[11] *Nwauzor v. GEO Grp., Inc.*, 2 Wn. 3d. 505, 513, 540 P.3d 93 (2023) (cleaned up).

[12] RCW 49.48.040-070.

hours or pay by their employers.[13] Among those workers who did not make a complaint, despite perceived violations, half said they feared they would be fired if they complained.[14] A recent study surveying over 1,000 California workers found that 38 percent of workers surveyed had experienced a workplace violation, and that a majority of those that came forward to report it experienced employer retaliation as a result.[15]

Retaliation—and the fear of retaliation—have a chilling effect, especially for those who live paycheck to paycheck, because the costs to workers for standing up for their rights can quickly escalate to reductions in hours, pay, or termination. "[M]issed bill payments, lower credit scores, eviction, repossession of a car or other property, suspension of a license,

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[13] BERNHARDT ET AL., *supra* note 1, at 3.

[14] *Id.*

[15] TSEDEYE GEBRESELASSIE, NAYANTARA MEHTA & IRENE TUNG, HOW CALIFORNIA CAN LEAD ON RETALIATION REFORMS TO DISMANTLE WORKPLACE INEQUALITY 4-5 (2022), https://www.nelp.org/app/uploads/2022/11/NELP-Report-CA-Retaliation-Funds-2022.pdf.

inability to pay child support or taxes, attorney's fees and costs, stress, trauma and more"[16] are all consequences of retaliation. For undocumented workers, who already experience disproportionately higher rates of wage theft,[17] the threat of their employers' immigration-based retaliation is especially chilling.[18]

The ability of L&I to bring suit on behalf of these aggrieved employees that are too frightened to come forward on their own must be given its full effect for their rights to be protected.[19]

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[16] LAURA HUIZAR, EXPOSING WAGE THEFT WITHOUT FEAR: STATES MUST PROTECT WORKERS FROM RETALIATION 7 (2019), https://www.nelp.org/app/uploads/2019/06/Retal-Report-6-26-19.pdf.

[17] BERNHARDT ET AL., *supra* note 1, at 43.

[18] REBECCA SMITH & EUNICE HYUNHYE CHO, WORKERS' RIGHTS ON ICE: HOW IMMIGRATION REFORM CAN STOP RETALIATION AND ADVANCE LABOR RIGHTS (2013), https://www.nelp.org/app/uploads/2015/03/Workers-Rights-on-ICE-Retaliation-Report.pdf.

[19] *See Dep't of Lab. & Indus. v. Overnight Transp. Co.*, 67 Wn. App. 24, 36, 834 P.2d 1295 (1987).

These experiences are reflected in the lives of Washingtonians. For example, one Fair Work Center client, a truck driver for a livestock farm in Eastern Washington, was systematically underpaid for the hours he worked and subjected to dangerous working conditions. Though these lost wages were significant for him, they amounted to less than $1000. After complaining to his employer, the employer fired him. His colleagues, suffering similar wage theft and health and safety issues, refused to come forward because they feared termination or other immigration-based retaliation.

Second, low-wage workers generally cannot afford to obtain professional legal assistance to enforce their rights on their own. Underfunding of legal aid assistance makes it difficult for these programs to meet demand.[20] Further, income eligibility requirements for pro-bono legal services can be extremely low—

[20] REBECCA BUCKWALTER-POZA, MAKING JUSTICE EQUAL 4 (2016), https://www.americanprogress.org/wp-content/uploads/sites/2/2016/12/MakingJusticeEqual-brief.pdf.

in 2015, "an individual had to make less than $14,713 per year—a family of four less than $30,313 per year—to be eligible for Legal Services Corporation aid," which constitutes the "biggest source of funding for civil legal aid for low-income Americans."[21]

Workers who don't meet the unrealistically low income requirements for legal aid, often don't have the funds or a high enough dollar value case to obtain private counsel. Finding a private attorney willing to take the average wage and hour case is nearly impossible, given the relatively low dollar amounts of many workers' claims. A 2023 CBS News investigation analyzing 650,000 complaints filed with state labor departments around the country found that the average amount owed to workers was just under $1,000.[22]

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[21] *Id.*

[22] Chris Hacker, Ash-har Quraishi, Amy Corral, & Ryan Beard, *Wage Theft Often Goes Unpunished Despite State Systems Meant to Combat It*, CBS NEWS (June 30, 2023, 8:00 AM), https://www.cbsnews.com/news/owed-employers-face-little-accountability-for-wage-theft/.

Thus, L&I is often the only entity able to help low-wage workers' recover wages owed to them. For example, Fair Work Center's truck driver client was owed an amount of money too small to engage private counsel, yet the amount was still significant for his survival. Fortunately, he was able to file a complaint with L&I and their involvement in his wage dispute was central to the successful recovery of the money he was owed.

Other Fair Work Center clients have had similar experiences, including a client who was a waitress at a restaurant chain in Eastern Washington. This client's employer stole portions of her tips and refused to compensate her for all hours worked. After filing a complaint with L&I, she was able to recover the money she was owed, in amounts that could never have been recovered through private enforcement.

Finally, some workers are unable to individually or collectively use the courts to enforce their wage rights, due to mandatory arbitration agreements required by their employers. The rise of employer-imposed forced arbitration agreements and

class and collective action waivers present a significant barrier for workers seeking to recover unpaid wages on their own. In this context, L&I is often the only effective recourse for workers because it is not bound by such private agreements.

The nature of forced arbitration agreements is inherently coercive, as an increasing number of employers require workers to agree to them as a condition of employment.[23] For many workers, withholding their signature could result in termination or denial of employment, putting their financial security and wellbeing at risk.

In 2018, more than 60 million workers in the U.S. were subject to mandatory arbitration agreements, foreclosing their right to file a lawsuit on their own behalf.[24] A 2019 study

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[23] KATHERINE V.W. STONE & ALEXANDER J.S. COLVIN, THE ARBITRATION EPIDEMIC: MANDATORY ARBITRATION DEPRIVES WORKERS AND CONSUMERS OF THEIR RIGHTS 3 (2015), https://files.epi.org/2015/arbitration-epidemic.pdf.

[24] ALEXANDER J.S. COLVIN, THE GROWING USE OF MANDATORY ARBITRATION: ACCESS TO THE COURTS IS NOW BARRED FOR MORE THAN 60 MILLION AMERICAN WORKERS 2 (2018), https://files.epi.org/pdf/144131.pdf.

estimated that by 2024, 80 percent of all private-sector, non-union employees would be subject to forced arbitration requirements and class/collective action waivers.[25]

Forced arbitration agreements disproportionally impact low-wage, Black, and female workers. A 2018 study found that 64.5 percent of workers who earned less than $13 per hour, 59.1 percent of Black workers, and 57.6 percent of female workers were all subject to forced arbitration.[26] Further, forced arbitration is wide-reaching across the workforce—a majority of Latinx workers (54.3 percent), White workers (55.6 percent), and male workers (53.5 percent) were also found to be subject to mandatory arbitration.[27]

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[25] KATE HAMAJI ET AL., UNCHECKED CORPORATE POWER: FORCED ARBITRATION, THE ENFORCEMENT CRISIS, AND HOW WORKERS ARE FIGHTING BACK 1 (2019), https://www.populardemocracy.org/sites/default/files/Unchecked-Corporate-Power-web.pdf.

[26] COLVIN, *supra* note 24, at 9.

[27] *Id.* Please note that the term "Latinx" is used to describe workers that the source describes as "Hispanic."

Making matters worse, employers routinely incorporate class or collective action waivers into these coercive agreements. This means that millions of workers are also forced to sign away their right to address widespread workplace violations through collective action that protects individuals from retaliation, makes workers more likely to come forward, and can result in broader impacts and compliance by companies.[28]

Faced with the prospect of trying to resolve their claims alone, in a process that heavily favors employers, 98 percent of workers whose claims are subject to forced arbitration abandon them.[29] The very few employees who do go to arbitration prevail in just 21 percent of cases—compared with 36 percent in federal court cases and 57 percent in state court cases.[30]

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[28] *Id.*

[29] Cynthia Estlund, *The Black Hole of Mandatory Arbitration*, 96 N.C. L. Rev. 679, 696 (2018), https://scholarship.law.unc.edu/cgi/viewcontent.cgi?article=5972&context=nclr.

[30] STONE & COLVIN, *supra* note 23, at 19.

In arbitration, employers are repeat players, giving them a significant advantage in the process.[31] And as drafters of the arbitration requirements workers sign, employers select the rules that apply and can impose additional procedural hurdles of their own, such as shortening the time period for pursuing a claim or limiting a worker's ability to collect necessary evidence through discovery.[32]

Further, the workers who actually prevail in arbitration recover significantly less than if they had filed suit—one study found that damages from arbitration are 16 percent of the average damages from federal court litigation and just 7 percent of the average damages in state court.[33]

The lack of recourse available to workers who are subject to forced arbitration is especially detrimental for the most

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[31] *Id.* at 22-23.

[32] HAMAJI ET AL., *supra* note 25, at 3.

[33] STONE & COLVIN, *supra* note 23, at 19.

vulnerable of workers[34] given that, as noted above, these contracts are more common amongst low-wage workers.[35] Specifically, it is estimated that low-wage workers were unable to recover more than $9.27 billion in stolen wages in 2019, in large part because they were subject to forced arbitration agreements.[36] The rampant use of forced arbitration agreements has led to disastrous outcomes for workers and has fueled the wage theft crisis precisely because workers have little recourse to vindicate their rights.[37]

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[34] Fair Work Center's clients have experienced such arbitration barriers. In enforcing local minimum compensation ordinances, low wage delivery workers, hired through apps like UberEats and DoorDash, are required to engage with expensive and confusing arbitration schemes to recover small amounts of money on their own. Public enforcement is often the only meaningful route for their recovery.

[35] COLVIN, *supra* note 24, at 9.

[36] *Id.* at 6.

[37] HUGH BARAN & ELISABETH CAMPBELL, FORCED ARBITRATION HELPED EMPLOYERS WHO COMMITTED WAGE THEFT POCKET $9.2 BILLION IN 2019 FROM WORKERS IN LOW-PAID JOBS (2020), https://www.nelp.org/insights-research/forced-arbitration-cost-workers-in-low-paid-jobs-9-2-billion-in-stolen-wages-in-2019/

For this vast and growing majority of U.S. workers barred from accessing the courts, public enforcement like L&I is the most effective and often the only way for them to recover what they are owed. This Court should not endorse additional barriers to L&I's efforts to bring enforcement actions on behalf of workers.

B. Requiring L&I to calculate exact damages owed before acting would reward employers for noncompliance with recordkeeping requirements.

1. Employers frequently do not keep employee records, especially in low-wage industries where wage violations are the most common.

The respondents in this case had a clear duty to keep and produce records of their employees' wages and hours worked,[38] a duty which they flagrantly violated. Employer record-keeping requirements are fundamental to the enforcement of wage laws,

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(2019 study finding that $12.6 billion in wages stolen from private sector non-union workers subject to forced arbitration).

[38] RCW 49.46.040(3); *see* RCW 49.46.070 (obligating employers to "make and keep" records of employee information); *see also* WAC 296-128-010 (obligating employers to keep records for each employee covering 15 categories of information).

since employers are in the best position "to know and produce the most probative facts concerning the nature of the amount of work performed" by their employees.[39]

This recordkeeping duty is especially vital for effective enforcement in workplaces with large concentrations of low-wage workers who may be paid off-the-books in cash or by personal check and who receive very little, if any, documents from their employer.[40] However, too many employers in these

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[39] *Anderson v. Mt. Clemens Pottery Co.*, 328 U.S. 680, 687, 66 S.Ct. 1187 (1946); *see Brady v. Autozone Stores, Inc.*, 188 Wn.2d 576, 584, 397 P.3d 120 (2017) (providing evidence "should not be an onerous burden on the employer, who is already keeping track of the employee's time for payroll purposes" and citing the "comparable burden shifting and record retention responsibility on the employer regarding the employee's claim under [FLSA])." Washington courts often look to precedent under the Fair Labor Standards Act ("FLSA") to interpret corresponding provisions of the MWA. *See*, *e.g.*, *Anfinson v. FedEx Ground Package Sys., Inc.*, 174 Wn.2d 851, 869-870, 281 P.3d 289 (2012) (adopting the FLSA's economic realities test for which workers are employees as defined by the MWA).

[40] *See, e.g.* BERNHARDT ET AL., *supra* note 1, at 3 (finding that 57 percent of low-wage workers did not receive pay stubs in violations of state laws requiring employers to provide workers with written documentation regarding wages, rates of pay and hours worked).

low-wage industries persist in failing to make, maintain, or produce records and face no consequences. This frustrates the ability of workers and/or L&I to vindicate their workplace rights.

Indeed, far from requiring L&I to specify damages with particularity, the existing law permits great latitude for the government in fixing damages. Where employers fail to keep records, or refuse to produce them, employees need only "produce[] sufficient evidence to show the amount and extent of that work as a matter of just and reasonable inference."[41] Indeed, any other rule would create an "impossible hurdle for the employee."[42]

2. The lower court's ruling creates an incentive for employers to not keep records, resulting in rewarding law-breaking employers, facilitating wage theft, and putting law-abiding businesses at a disadvantage.

If upheld, the impact of the lower court's ruling will be far reaching across low-wage industries that are already most

[41] *Anderson*, 328 U.S. at 687.
[42] *Id*.

affected by wage theft. Aggrieved workers should not be penalized by an employer's failure—or outright refusal—to comply with their recordkeeping duties under the statute.[43]

And employers should not be rewarded for thumbing their nose at their duty under the statute by refusing to provide payroll records.[44]

Such a result would give a green light for even more employers to violate workplace laws, secure in the knowledge that they can avoid liability by engaging in the same egregious conduct that Respondents did here. It would have the perverse effect of putting law-abiding businesses that *do* comply with

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[43] *See, e.g., id.* ("such a result would place a premium on an employer's failure to keep proper records in conformity with his statutory duty; it would allow the employer to keep the benefits of an employee's labors without paying due compensation as contemplated by the [FLSA].")

[44] *See, e.g. Peiffer v. Pro-Cut Concrete Cutting & Breaking Inc.*, 6 Wn. App. 2d 803, 824, 431 P.3d 1018 (2018) (where an employer complained about additional prejudgment interest "the difficulty in accounting for the unpaid wages was entirely attributable to . . . [the employer's] failing to keep a record of the amount of time originally reported by the employee").

their obligations under Washington's wage and hour laws at a disadvantage. And it would shift the costs of noncompliance onto the community as a whole.[45]

IV. CONCLUSION

The Court should overturn the Court of Appeals' decision in this case. L&I must have every tool available to it in order to serve vulnerable low wage workers. Allowing the decision below to stand will reward employers who violate their obligations under the law and impede critical enforcement activities.

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[45] *See, e.g. Parrish*, 300 U.S. at 399-400 (in upholding a Washington minimum wage statute, stating that "[t]he exploitation of a class of workers . . . is not only detrimental to their health and well-being, but casts a direct burden for their support upon the community . . . the community is not bound to provide what is in effect a subsidy for unconscionable employers").

Respectfully submitted this 27th day of September 2024,

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