



Superior Court of California of San Mateo County

Mazariegos et al. v. Vanguard Cleaning Systems et al.

Case No. 20-CIV-04267

Class Action Notice

Authorized by the Superior Court of San Mateo County

Do you or did you perform cleaning work as a unit franchisee for Vanguard Cleaning Systems, Inc., RR Franchising, Inc., or Buddha Capital Corporation between April 6, 2016 and November 24, 2025 and sign a franchise agreement without an arbitration clause?

There is a class action lawsuit and you may be a class member.

You need to make a choice.

1. If you want to be part of the class action, you should complete the enclosed questionnaire.

2. If you do not wish to participate, you need to opt out.

3. If you do not meet the class definition, please inform counsel.

Both deadlines are November 24, 2025.

Important things to know:

- If you meet the class definition and take no action, you will still be bound by

the case, and your rights will be affected.

- You can learn more at: www.nka.com/cases/v-z/vanguard-notice/

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About This Notice

Why did I get this notice?

This notice is to tell you about a class action lawsuit, *Mazariegos et al. v. Vanguard Cleaning Systems Inc. et al.* brought on behalf of people who work or have worked as a unit franchisee cleaner for Vanguard Cleaning Systems, Inc. ("Vanguard"), RR Franchising, Inc. d/b/a Vanguard Cleaning Systems of Southern California and d/b/a Vanguard Cleaning Systems of Northern California ("RR Franchising"), or Buddha Capital Corporation d/b/a Vanguard Cleaning Systems of Sacramento, Vanguard Cleaning Systems of the Central Valley, and Vanguard Cleaning Systems of the Central Coast ("Buddha") (collectively, "Defendants"). **You received this notice because you may be a member of the group of people affected, called the "class."** This notice gives you information about the case and tells you how to opt out if you don't want to be part of it.

Read this notice to understand the case and to determine if you are a class member. Then, decide if you want to stay in the case or opt out. If you have questions or need assistance, please go to www.nka.com/cases/v-z/vanguard-notice/ or call 612-256-3238.

What is the deadline to opt out?

The deadline to be excluded from the case is November 24, 2025.

Who is in the class?

This is the definition of the class that the court approved:

All individuals who:

- (a) signed a Franchise Agreement with a "Defendant" (Vanguard Cleaning Systems, Inc.; RR Franchising, Inc.; and/or Buddha Capital Corp) that established a unit franchise ("Franchise") and did **not** include an arbitration agreement; and
- (b) performed cleaning services in California during the "Class Period" (the period beginning April 6, 2016 through the date of trial) for "Vanguard" cleaning accounts serviced by the Franchise established

by the Franchise Agreement signed by the same person;

(c) BUT EXCLUDING:

- i. Individuals who signed any Franchise Agreement with a Defendant that included an arbitration agreement; and
- ii. Individuals who signed a Dispute Resolution Agreement entered into with Vanguard Cleaning Systems, Inc.;

Additionally, class certification will be granted for two subclasses:

- (a) The **“RRF Subclass”** includes all class members who: (a) signed a Franchise Agreement with RRF establishing a Franchise;
- (b) The **“Buddha Subclass”** includes all class members who signed a Franchise Agreement with Buddha establishing a Franchise.

Please note that in order to be eligible for the class, you need to have personally performed cleaning services. If you did not personally perform cleaning work, please contact the lawyers (contact information below) to let them know.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. The Court decided that the law firms of Rukin Hyland & Riggin LLP and Nichols Kaster LLP are qualified to represent the interests of the Class in this lawsuit. These firms are called “Class Counsel” and they are experienced in handling similar cases. More information about these law firms is available at their respective websites: www.rukinhyland.com and www.nka.com. The following attorneys from the firms are handling the case, and you are welcome to contact them:

JESSICA RIGGIN (SBN 281712)
jriggin@rukinhyland.com
RUKIN HYLAND & RIGGIN LLP
1939 Harrison Street, Suite 925 Oakland, CA 94612
Telephone: (415) 421-1800
Facsimile: (415) 421-1700

MATTHEW C. HELLAND (SBN 250451)

helland@nka.com

DANIEL BROME (SBN 278915)

dbrome@nka.com

NICHOLS KASTER, LLP

235 Montgomery Street, Suite 810

San Francisco, CA 94104

Telephone: (415) 277-7235

Facsimile: (415) 277-7238

These are the lawyers who are bringing this case on your behalf. **You will not be charged for their services**, although their fees may be paid with the court's approval from any settlement that they negotiate for the class.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Learning About the Lawsuit

What is this lawsuit about?

Plaintiffs filed a lawsuit in 2020 claiming that Defendants violated California laws regarding worker wages and hours by misclassifying them as independent contractors and, as a result, improperly deducted from their pay and failed to pay them certain business expenses owed. The lawsuit seeks to recover reimbursement of expenses, as well as statutory and civil penalties, interest, and attorneys' fees.

Defendants deny that they did anything wrong.

Where can I learn more?

You can get a complete copy of the key documents in this lawsuit by visiting:
www.nka.com/cases/v-z/vanguard-notice/.

What happens next in this lawsuit?

The lawyers will continue to pursue legal action and then prepare the case for trial, unless the two sides decide to settle the case. There is no

guarantee that the Plaintiffs will win, or that they will get any money for the Class.

Deciding What To Do

What are my options if I DIDN'T personally perform cleaning work?

If you did not personally perform any cleaning work, you do not meet the class definition, and you are not included in this case. You should complete the Questionnaire at the end of this Notice and return as directed below. You may also contact the attorneys, listed on page 9, by mail, email, or phone and clearly state that you did not personally perform any cleaning work.

If you do not meet the class definition because you never performed cleaning work, you won't get any money or benefits from this lawsuit even if the Plaintiffs obtains them as a result of a trial or settlement.

You may have the right to pursue your own claims, either by representing yourself, or with counsel of your own choice at your own expense, provided you pursue that right within certain legal deadlines. You should talk to your own lawyer soon to determine any deadlines you may have.

What are my options if I DID personally perform cleaning work?

You have two options. You can stay in the case and return the enclosed questionnaire, or you can opt out of the case.

Staying in the Case

What should I do to stay in the case?

If you want to stay in the case, you should complete the enclosed questionnaire and return it by mail, email, or via the website, by November 24, 2025. If you have questions about the questionnaire, you should contact the lawyers representing the class, listed on page 9.

By returning a questionnaire and staying in the case, you will be part of

the case and your rights will be affected by the outcome. You won't be able to start, continue, or be part of any other lawsuit against Defendants about the issues in this case.

If the Plaintiffs win or settle, class members may be entitled to money. If Defendants win, class members will receive nothing.

What happens if I do nothing?

If you do nothing, and do not fill out the questionnaire, you will still be part of the case and your rights will be affected by the outcome. However, the Court may require that you later respond to other questions, including the questions in the questionnaire and/or that you provide information about how much work you performed. If you do not submit the questionnaire, the Court may find that you are prohibited from introducing evidence at trial about the cleaning services you personally performed, and you may need to rely on average information from other Plaintiffs; if you do not respond, it is also possible that you will later be excluded from this case.

You won't be able to start, continue, or be part of any other lawsuit against Defendants about the issues in this case. If the Plaintiffs win or settle, class members may be entitled to money. If Defendants win, class members will receive nothing.

Opting Out

What if I don't want to be part of this case?

You can opt out.

If you opt out, you will not have the right to get any money or benefits in the event Plaintiffs obtain them as a result of a trial or settlement in this lawsuit.

You will still have the right to pursue your own claims, either by representing yourself, or with counsel of your own choice at your own expense, provided you pursue that right within certain legal deadlines. If you do exclude yourself so that you can bring your own claims against Defendants, you should talk to your own lawyer soon to determine any deadlines you have.

How do I opt out?

To opt out of the case, you must send a letter or email to the address indicated below that includes the following statement (or a similar statement that makes the same points):

“I hereby request to be excluded from the Mazariegos/Vanguard Class Action. I understand that by opting out of the case I will not be bound by the outcome and will not receive any benefit that may result from the case. My contact information is as follows: [Name, Address, Phone Number, Signature, Date].”

You must send the letter or email containing the above information prior to the November 24, 2025 deadline to one of the following addresses:

4700 IDS Center
80 South 8th St.
Minneapolis, MN 55402

OR

VanguardCase@nka.com

You must sign the opt out request (even if sent via email), and it must be sent no later than November 24, 2025.

Key Resources

How do I get more information?

This notice summarizes the decision to certify the case as a class action. There are more details in the case documents. To get a copy of the case documents or get answers to your questions:

- contact the lawyers who represent the class (information below);
- visit the case website at www.nka.com/cases/v-z/vanguard-notice/;
- access the Court's public portal online or by visiting the clerk's office of the Court (address below).

Resource	Case Information
Case website	www.nka.com/cases/v-z/vanguard-notice/
Phone Number	612-256-3238
Toll Free	877-448-0492
Your Lawyers	JESSICA RIGGIN (SBN 281712) jriggin@rukinhyland.com RUKIN HYLAND & RIGGIN LLP 1939 Harrison Street, Suite 925 Oakland, CA 94612 Telephone: (415) 421-1800 Facsimile: (415) 421-1700 MATTHEW C. HELLAND (SBN 250451) helland@nka.com NICHOLS KASTER, LLP 235 Montgomery Street, Suite 810 San Francisco, CA 94104 Telephone: (415) 277-7235 Facsimile: (415) 277-7238
Court (DO NOT CONTACT)	Superior Court of San Mateo County Department 4 Courtroom 4C Southern Courthouse, 400 County Center Redwood City, CA 94063

Retaliation Prohibited

Can Defendants retaliate against me for my participation in this case?

No, it is against the law for any of the Defendants to retaliate against you for participating in this lawsuit.

Class Action Questionnaire

Mazariegos v. Vanguard Cleaning Systems

If you are staying in the class action, please complete this form. The failure to submit this questionnaire may result in your exclusion from the case.

This is not a claim form. **This is not an attorney client privileged communication.**

If you complete this form, the information you provide will be used in the class action and provided to both Plaintiffs' counsel and Defendant's counsel; however, your contact information will not be shared with Defendant's counsel. Defendants cannot retaliate against you for participating in this case or submitting this questionnaire.

Please answer all questions as accurately as possible; by signing, you will confirm your answers are true and correct under penalty of perjury. If you have any questions, you may contact Plaintiffs' counsel.

1. During the time period of **April 6, 2016 through the present**, did you personally perform cleaning services in California for "Vanguard" cleaning accounts serviced by the Franchise (that is, you yourself going to Vanguard accounts and doing the cleaning work as opposed to other individuals doing the work)? [YES / NO]
 - a. If you answered "YES" to Question 1, approximately how much of the cleaning work provided by your Franchise did you personally perform during this time period (versus cleaning work performed by other individuals)?
 - ☐ More than 75%
 - ☐ Between 50% - 75%
 - ☐ About 50%
 - ☐ Between 25% - 50%
 - ☐ Less than 25%
 - b. If you answered "YES" to Question 1, approximately how much of the time that you spent working at Vanguard cleaning accounts involved supervising other individuals performing cleaning work (such as family members, helpers, or employees) versus time you spent performing cleaning work yourself?
 - ☐ More than 75%
 - ☐ Between 50% - 75%
 - ☐ About 50%
 - ☐ Between 25% - 50%
 - ☐ Less than 25%
 - c. If you answered "YES" to Question 1, did you personally perform cleaning services in California for "Vanguard" cleaning accounts serviced by the

Franchise during the time period of **April 6, 2019 through the present**? [YES / NO] (Note that this question asks about a shorter period than Question 1.)

2. During the time period of **April 6, 2016 through the present**, did you personally pay for (i.e., from your personal funds) expenses the Franchise incurred as the result of providing cleaning services for “Vanguard” accounts (such as the cost of tools, equipment, cleaning chemicals, cleaning supplies, or gas)? [YES / NO]
- a. If you answered “YES” to Question 2, approximately how much of the Franchise’s expenses did you personally pay for (versus amounts paid by another individual or entity) during the period of **April 6, 2016 through the present**?
- ☐ More than 75%
 - ☐ Between 50% - 75%
 - ☐ About 50%
 - ☐ Between 25% - 50%
 - ☐ Less than 25%
- b. If a business entity paid for any of the expenses the Franchise incurred as the result of providing cleaning services for “Vanguard” accounts (such as the cost of tools, equipment, cleaning chemicals, cleaning supplies, or gas), approximately how much of the expenses did the business entity pay?
- ☐ More than 75%
 - ☐ Between 50% - 75%
 - ☐ About 50%
 - ☐ Between 25% - 50%
 - ☐ Less than 25%
- c. Approximately how much, if any, of these expenses were paid for by someone other than you or the business entity addressed above (if applicable)?
- ☐ More than 75%
 - ☐ Between 50% - 75%
 - ☐ About 50%
 - ☐ Between 25% - 50%
 - ☐ Less than 25%

After answering the questions, fill out form below and mail OR email to address provided. You may also submit your answers on WEBSITE.

BY SIGNING BELOW, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING RESPONSES ARE TRUE AND CORRECT.

Date _____

Signature _____

Typed or Printed Name _____

Street Address _____

City, State, Zip Code _____

Telephone number, including area code [OPTIONAL] _____

Complete form and mail or email to the address listed to the right, or complete the form on

<https://nka.formstack.com/forms/vanguard>.

4700 IDS Center

80 South 8th Street

Minneapolis, MN 55402

VanguardCase@nka.com

<https://nka.formstack.com/forms/vanguard>