

Item 1: Applicant Grant Request & Contact Information Form

WORKERS' RIGHTS ENFORCEMENT GRANT Item 1: Applicant Grant Request and Contact Information Form YEAR 2 - August 1, 2025 to July 31, 2026	
Grantee: San Francisco City Attorney's Office, Worker Protection Team	
County or City: San Francisco	
Funds Requested (cannot exceed \$750,000):	
Person with day-to-day operational responsibility for the program.	
Name	Matthew Goldberg
Title	Chief Attorney, Worker Protection Team, S.F. City Attorney's Office
Address	City Hall; 1. Dr. Carlton B. Goodlett Place; San Francisco CA 94102
Email Address	Matthew.Goldberg@sfcityatty.org
Phone Number	(415) 554-4686
Financial Officer or Person Responsible for the Grant Funds Financial Accounting.	
Name	Dora Okai
Title	Chief Financial Officer, S.F. City Attorney's Office
Address	1390 Market Street, 7th floor; San Francico CA 94102
Email Address	Dora.Okai@sfcityatty.org
Phone Number	(415) 554-4271

2. PROBLEM STATEMENT

In many respects, the City and County of San Francisco (City or San Francisco)—home to more than 800,000 residents—reflects the broader problem of wage theft in California. Many of our residents are thriving, but San Francisco has one of the highest income inequality ratios of any metro area and just over 10% of City residents live in poverty. With respect to labor practices, wage theft is unfortunately commonplace. The Labor Commissioner’s Office received over 700 wage claims from San Francisco residents in 2021, and the City’s local agency enforcing worker protection laws, the Office of Labor Standards Enforcement (OLSE), fields over 5,000 calls and opens over 400 cases every year.

While wage theft is ubiquitous in California, with more than \$2 billion stolen from California workers annually, San Francisco faces unique challenges. Its workforce includes a significant portion of workers who are particularly vulnerable to exploitation. San Francisco is one of the most culturally and linguistically diverse cities in the country. One in three residents of San Francisco is an immigrant, 18.9% identify as Limited English Proficiency (LEP), and 42.9% speak a language other than English at home.¹ Low-wage immigrant workers are particularly likely to be victims of wage theft, in part because of their vulnerability to exploitation as a result of language, education, and citizenship status

By way of example, San Francisco is home to over 300,000 Asian American and Pacific Islander (AAPI) residents and has the highest percentage of residents of Chinese descent of any major city in the country. According to one recent [report](#), one in five California residents who identify as AAPI—this would be approximately 60,000 San Franciscans—reported being the victim of wage theft in the prior year.² In a 2014 [survey](#) of more than 400 workers in San Francisco’s Chinatown district, close to 60% of workers reported one or more forms of wage theft (e.g., receiving less than minimum wage, no overtime pay, etc.)³ Furthermore, nearly one in five San Franciscans work in the construction, retail, and hospitality industries, which are persistently associated with high rates of wage theft and worker exploitation.

San Francisco’s employer base is also unique. The City is home to some of the largest and wealthiest tech companies in the world. A few of these companies have pioneered business models with abusive labor practices that have spread to other locations and industries.

In sum, San Francisco residents suffer from widespread wage theft and abusive labor practices. And our workforce—disproportionately immigrant and LEP, clustered in low-road industries—also confronts unique challenges and barriers.

¹ San Francisco Language Access Compliance Summary [Report](#) 2024; S.F. Office of Civic Engagement & Immigrant Affairs (2024.)

² The Working Lives and Struggles of Asian Americans and Pacific Islanders in California, Findings from the 2019 AAPI California Worker Survey; PRRI (2019).

³ Wage Theft as a Neglected Public Health Problem: An Overview and Case Study From San Francisco’s Chinatown District; American Journal of Public Health (2014 June).

3. WAGE THEFT EXPERIENCE

San Francisco's Rich History Combatting Wage Theft and Other Forms of Worker Exploitation

The City and the San Francisco City Attorney's Office (SFCAO or "Office") have a long and storied history of advancing the rights of workers and combatting wage theft.

Over the past two decades, via both voter initiative and local legislation, San Francisco has enacted a series of landmark worker protection laws. These laws include, but are not limited to: the Minimum Wage Ordinance (2003), the Health Care Security Ordinance (2006), the Paid Sick Leave Ordinance (2006), the Family Friendly Workplace Ordinance (2014), the Paid Parental Leave Ordinance (2016), the Residential Construction Wage Theft Prevention Ordinance (2022), the Public Health Emergency Leave Ordinance (2022), the Domestic Worker Sick Leave Ordinance (2023), and the Military Leave Pay Protection Act (2023). Just last year, in recognition of this growing body of law, San Francisco reorganized its codes to establish the nation's first municipal Labor & Employment Code.

All told, San Francisco has the strongest municipal worker protection laws in America. But as with most laws that afford rights to working people, these laws would have little impact without a robust enforcement program. Fortunately, in addition to establishing rights and protections, these local labor laws provide for a comprehensive enforcement scheme. Generally speaking, San Francisco's OLSE is empowered to investigate alleged violations and order relief (including backpay and penalties) via administrative findings. In its most recent fiscal year, OLSE opened 472 cases and successfully resolved 431 cases—both records.

The SFCAO serves as OLSE's counsel, defends OLSE's findings in administrative hearings and subsequent court actions, and has independent authority to bring lawsuits under San Francisco's local labor laws. OLSE and the SFCAO have worked collaboratively for decades and have secured over \$10 million in restitution for workers in each of the last six fiscal years.

Moreover, the SFCAO has an additional enforcement tool at its disposal. The Office has long been one of a handful of municipal law offices in the state with the authority under California's Unfair Competition Law (UCL) to bring affirmative lawsuits on behalf of the People of the State of California. Over time, the SFCAO has established itself as a statewide leader in bringing and resolving high-impact affirmative litigation.

Actions to combat wage theft and otherwise enforce worker protection laws—both local and state laws—have long been a central element of this docket. Between 2012 and 2022, the SFCAO secured a number of significant results in combatting wage theft and other forms of worker exploitation, including: \$500,000 in unpaid minimum wages and interest for [car wash workers](#); \$2 million to nearly 4,000 [restaurant workers](#) based on fraudulent health care surcharges; \$1.34 million in restitution for [janitorial workers](#); \$5 million for 4,500 misclassified [delivery drivers](#), and almost \$2 million in restitution for catering workers.

City Attorney David Chiu & the Establishment of the Office's Worker Protection Team

Over the course of his nearly two decades in public office—as a member of the San Francisco Board of Supervisors, as a California Assemblymember, and now as San Francisco

City Attorney—David Chiu has demonstrated an unwavering commitment to advancing and protecting the rights of workers.

Building on this commitment, in 2022, City Attorney Chiu established the Office’s first-ever Worker Protection Team (WPT or “Team”) to build-out the Office’s subject-matter expertise and expand its enforcement capacity. This is believed to be the first such team at a municipal law office in California—and perhaps the country.

The Team is currently staffed by the following professionals:

- Matthew Goldberg is the founding and current team leader. Matthew has combatted wage theft and other abusive workplace practices for nearly all of his twenty-year legal career. In prior roles, Matthew led the Wage Protection Program at Legal Aid at Work, led OLSE’s enforcement of the Health Care Security Ordinance, litigated a wide-range of cases on behalf of workers and consumers on the Office’s Affirmative Litigation Team, and served as the chief advisor to California Attorney General Rob Bonta on workers’ rights and labor matters.
- Ian Eliasoph is a Deputy City Attorney on the Team. Before joining the Office, Ian worked as an attorney and supervisor for the Solicitor’s Office of the U.S. Department of Labor, where he led enforcement efforts in numerous areas of federal employment law and assisted in recovering tens of millions of dollars for workers.
- Maureen Slack is a Deputy City on the Team. Before joining the Office, she was a legal aid lawyer and practiced plaintiff-side employment law with Sanford Heisler Sharp McKnight LLP.
- Hannah Giorgi is the Team’s Legal Assistant. Hannah assists in developing new cases, prepares all legal pleadings for filing, and manages the Team’s discovery and document review.
- Attorneys from the Office’s Code Enforcement Team and Affirmative Litigation Team assist the WPT to bolster its capacity.
- Finally, the Team receives additional support and staffing from the Office’s legal secretaries and investigators.

In its first couple of years, from its inception in late 2022 through the summer of 2024, the Team secured several notable results:

- In January 2023, the Team [resolved](#) an OLSE investigation against Instacart for over \$5 million in restitution for over 5,000 misclassified delivery drivers who were denied their right to health care benefits.
- In July 2023, the Team secured a stipulated Judgment and Injunction against a popular chain of Peruvian restaurants for nearly a \$1 million in payments to 231 workers for violations of the Health Care Security Ordinance.

- In February 2024, the Team [obtained](#) a first-of-its-kind Judgment and Injunction to resolve litigation against Qwick, a hospitality staffing company, for misclassifying thousands of temporary workers. The judgment requires Qwick to pay \$1.5 million to over 6,000 workers in unpaid overtime wages, establish a sick leave bank for eligible workers of up to \$350,000, and permanently reclassify its thousands of temporary workers as employees.

2024-2025: Workers' Rights Enforcement Grant from the Labor Commissioner's Office

Our Office was awarded \$410,000 for the Workers' Rights Enforcement Grant Program for the Funding Period of August 1, 2024 to July 31, 2025. This funding has buttressed our enforcement efforts considerably. First, it helped justify the Team's hiring of a new, full-time attorney, Maureen Slack, in January 2025. Second, and perhaps more important, it has bolstered our (successful) efforts to keep our team focused almost exclusively on combatting wage theft. Given limited resources across our Office, and the City's ever-growing legal demands, it is noteworthy that our Team's resources remain squarely focused on eradicating abusive workplace practices.

Supported by these grant funds, our enforcement efforts have resulted in a number of important victories in this first grant cycle. Here are some highlights:

- In October 2024, we negotiated a settlement agreement with an employment agency that resulted in over \$600,000 in restitution payment to more than 200 workers.
- In December 2024, after just six months of litigation, the team [secured](#) a Partial Stipulated Judgment and Injunction against WorkWhile, a gig staffing company, stemming from WorkWhile's misclassification of its temporary workforce. The Judgment requires WorkWhile to pay a total of \$1 million to approximately 8,000 previously misclassified workers. More importantly, the Injunction required WorkWhile to reclassify all these workers moving forward. (We continue to litigate the case with respect to the subset of workers for whom we did not reach a negotiated resolution.)
- In January 2025, we [secured](#) our third Stipulated Judgment and Injunction against a gig staffing company, GigSmart, for (once again) misclassifying its temporary workforce. GigSmart paid \$100,000 in civil penalties to our Office and \$709,000 in restitution to more than 4,000 workers. These payments compensated the workers for the overtime premiums, sick leave, and business expense reimbursements they were previously denied. Once again, as in our previous misclassification cases against Qwick and WorkWhile, GigSmart agreed to reclassify all of its temporary workers as employees moving forward.
- In February 2025, we [negotiated](#) settlement agreements with fifteen Amazon Delivery Service Providers (DSPs) for their failure to provide employees with required health care benefits. Under these agreements, the DSPs paid one-thousand workers a total of just over \$1.9 million in restitution and \$273,000 in penalties to OLSE.

In addition to these recent victories, the Team continues to actively participate in the longstanding, multi-party misclassification litigation against rideshare companies Uber and Lyft. And we have filed and are actively litigating two more cases in court. First, we filed a breach of contract action on behalf of OLSE to enforce a settlement agreement that calls for more than \$400,000 in restitution payments to San Francisco workers. Second, we filed our fourth large misclassification action—this time against GoShare, a last-mile delivery and moving service. We are seeking restitution, penalties, and injunctive relief that will benefit thousands of GoShare workers.

Looking forward, the Team stands poised to build on its past successes and continue securing meaningful victories for San Francisco and California workers.

4. APPLICANT'S STRATEGIC PLAN

At its inception in 2022, City Attorney David Chiu [established](#) the Worker Protection Team with the following mission statement:

The mission of the Worker Protection Team is to protect the rights of workers in San Francisco and California with an emphasis on combatting systemic business practices that exploit marginalized workers. Building on the Office's longstanding leadership in affirmative litigation, the Worker Protection Team investigates and litigates instances of wage theft, employee misclassification, and other abusive workplace practices. The Worker Protection Team also advises and supports the City's Office of Labor Standards Enforcement, which enforces more than two dozen local workplace protection ordinances, including ordinances that establish rights to a minimum wage, paid sick leave, paid parental leave, and healthcare benefits.

This mission—perfectly aligned with the goals of this grant program—will continue to guide our work. We will deploy the grant funds to advance this mission by combatting the problems identified above (see Item 2). But as the stewards of (limited) public resources, the Team is also laser focused on *maximizing* our impact. To that end, our principle blueprint is to source and prosecute the highest-impact enforcement matters.

More specifically, we will engage in a wide-range of outreach to *identify* and *source* high-impact targets for our investigations. In partnership with OLSE (as described in more detail in Item 5, below), we will work with community organizations and our sister public sector entities to identify bad actors and bad practices. Over the course of our investigations and in evaluating where to devote our limited investigative and litigation resources, we will strategically *evaluate* the anticipated impact of any potential enforcement action by considering the following criteria.

1. The workers: Does the action support workers who earn low wages, are otherwise vulnerable, and/or who will have trouble securing adequate private counsel?
2. The target: Does the target of our action have a history of bad labor practices or of engaging in *willful* misconduct? Is the target an industry leader?

3. The industry: Does the target operate in an industry that is historically and currently associated with exploitative labor practices?
4. The conduct: Are the unlawful practices especially egregious or notable? Are they a new or novel form of exploitation?
5. Our place: Is our Team uniquely or especially well positioned to take on a matter? Are there specific barriers, like arbitration agreements and class action waivers, that make private litigation unlikely?
6. The results: Can our Team reasonably expect to secure substantial restitution for workers, put a stop to ongoing bad practices, and/or deter similar or related bad practices?

This strategic plan does not deviate from the plan we set forth in last year's grant application. But the Team has developed a burgeoning expertise in statewide misclassification cases—particularly in the so-called gig economy. Consistent with our effort to maximize our impact, we will try to leverage our expertise and experience in this area by seeking out additional high-impact cases in this space.

5. COLLABORATION WITH COMMUNITY PARTNERS

As San Francisco's front line for receiving and processing worker complaints, OLSE has long focused on public engagement and collaborating with community partners. To that end, OLSE administers a community outreach program dedicated to reaching workers who may be more vulnerable to wage theft and other labor law violations. As part of this program, OLSE contracts with the following seven community organizations to disseminate information on workers' rights in low-income and immigrant communities, provide individualized worker rights consultations, and encourage workers to file complaints regarding violations of San Francisco's labor laws: [Asian Law Caucus](#) (ALC), [Chinese Progressive Association](#) (CPA), [La Raza Centro Legal](#) (LRCL), [Dolores Street Community Services](#) (DSCS), [Filipino Community Center](#) (FCC) [South of Market Community Action Network](#) (SOMCAN) and [Trabajadores Unidos Workers United](#) (TUWU).

The WPT will continue to partner with OLSE and evaluate referrals from these CBO partners for potential civil litigation. We will also meet with these and other community partners—including labor unions—to gain insight into the challenges that San Francisco workers face, hone our enforcement priorities, and develop new cases.

In addition to these community organizations, the Team will continue its longstanding practice of meeting regularly with staff at the relevant federal, state, and local public agencies (including the U.S. Department of Labor, the California Labor Commissioner's Office, the Worker Rights and Fair Labor Section of the California Attorney General's Office, and the various city attorney and county counsel offices who also work to combat wage theft). In building these relationships—and exchanging and sharing information and best practices—we will enhance our enforcement capacity. These relationships may also generate opportunities for multi-office collaboration.

In this current grant year, we filed two of our misclassification cases after consulting with government partners—the California Attorney General’s Office and the City of Denver—that were engaging in related investigations against similar entities. This information sharing proved invaluable in our development of these cases. In the coming grant year, we will seek to deepen these various relationships in hopes of gaining further insights from our partners.

6. EXPECTED OUTCOMES

High-impact enforcement work, particularly civil litigation against large corporations engaged in exploitative employment practices, is inherently unpredictable. Sophisticated defendants have developed an expansive array of tools to delay litigation, including frivolous removal motions, motions to challenge jurisdiction, motions to compel arbitration, painstaking discovery delays, and all the associated appeals. Notwithstanding these inevitable uncertainties and vagaries, with the requested grant funds, the Team expects to achieve the following enforcement outcomes during the grant year:

- Evaluate at least a dozen potential targets;
- Conduct at least six comprehensive investigations;
- File at least two new civil lawsuits;
- Directly represent OLSE in at least 10 matters at the administrative enforcement stage of OLSE investigations; and
- Resolve at least six matters, resulting in substantial restitution to workers and/or significant injunctive terms.

These expected outcomes are consistent with the outcomes we sought to achieve in this current grant period (and which we expect to largely satisfy by the end of this period).

7. BUDGET NARRATIVE

The San Francisco City Attorney’s Office has a Worker Protection Team comprised of several full-time professionals. The Team also draws upon other professionals throughout the Office. Our attached budget seeks *partial* funding for six professionals: a Chief attorney, four Deputy City Attorneys (at different steps in the job classification), and a Legal Assistant. Because these professionals spend only some of their time engaged in qualifying labor law enforcement work, our budget conservatively seeks funding for a portion of each professional’s salary and benefits. The budget indicates the specific percentages for each position.

For each position, the budget is based on the full cost of the position, which includes salary and benefits. The budget request for each position is equal to this fully-loaded cost multiplied by the portion (or percentage) of time for which we seek funding.

We are requesting a total of \$724,173 in grant funding, which is comprised of \$689,173 for “Salaries and Employee Benefits” and \$35,000 to complete the mandatory Annual Audit. The \$35,000 request for the audit is 4.8% of the total grant request.

Item 7 Budget Form

**WORKERS' RIGHTS ENFORCEMENT GRANT BUDGET:
PERSONNEL, ADMINISTRATIVE COSTS
YEAR 2 (August 1, 2025 – July 31, 2026)
FISCAL YEAR 2025-2026**

APPLICANT NAME: San Francisco City Attorney's Office, Worker Protection Team

A. PERSONNEL SERVICES: Salaries and Employee Benefits

COST

Position (Percent) Salary Benefits

Chief Attorney, 50% (FTE = \$391,471).

\$195,736

Deputy City Attorney, Step 16, 80% (FTE = 351,180).

\$280,944

Deputy City Attorney, Step 10, 50% (FTE = \$276,255).

\$138,128

Legal Assistant, 50% (FTE = \$148,732).

\$ 74,366

\$689,173 Sub-total

Full Time Equivalent (FTE) includes salary + fringe benefits.

B. ANNUAL AUDIT: ADMINISTRATIVE CHARGE

COST

Annual Audit Price

Independent Audit

\$35,000

A & B - PERSONNEL & AUDIT

TOTAL COST

TOTAL

\$724,173