

UNITEHERE! Local 11

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Via Email: DOSHLA@dir.ca.gov; mzubair@dir.ca.gov; pguevara@dir.ca.gov

Re: Complaint re Unsafe Working Conditions (including Mold, Vermin, Excessive Heat, and Other Hazards) and Request for Inspection at Flying Food Group located at 901 W. Hillcrest Blvd, Inglewood, CA 90301 (central facility) and 5343 W Imperial Hwy, suite #800-850, Los Angeles, CA 90045 (warehouse facility).

Dear Mr. Zubair and Mr. Guevara:

This complaint is submitted on behalf of UNITE HERE Local 11 (“Union”) and its members who work at Flying Food Group (“Company,” “Employer” or “FFG”) at their facilities servicing airlines at Los Angeles International Airport (“LAX” or “Airport”).

Complainants request that the California Division of Occupational Safety and Health (“Cal/OSHA”) conduct an on-site inspection of the workplace to investigate the concerns reviewed herein. More specifically, this Complaint includes the following allegations, among several others:

- An outbreak of maggots, flies, and mold in decomposing food and lack of appropriate PPE
- Mold growing on dish room ceiling
- Cockroaches or similar vermin in the workplace
- Excessive heat and illness risk in the dish room
- Insufficient or nonexistent soap and drying paper in facility restrooms
- Failure to provide food for employees in accordance with hygienic standards
- General failure to maintain an effective injury and illness prevention program

As noted below, we ask that Cal/OSHA investigate these allegations through an onsite inspection that includes interviews with employee witnesses.

1. Background on Flying Food Group

FFG is an airline catering company that supplies in-flight meals to numerous international airlines. The Company has a record of violating worker safety protections. In August 2023, Cal/OSHA cited FFG for six workplace safety violations (one of which was marked “Serious”), including bolting an exit door shut from the outside on the day of a planned worker picket line and failing to ensure that refrigerated rooms could be opened from the inside. FFG fought the citations for over two years before agreeing to a February 2026 Settlement Order affirming them and paying fines. *See* Cal/OSHA Inspection Number 1652143.

In the meantime, FFG apparently failed to correct the entrapment hazard in refrigerated rooms, leading to a near tragedy during a fire on January 22, 2026. After more than 300 coworkers evacuated during the fire, two workers were found inside a cooler room whose entrance door had been chained shut from the outside — the exact hazard for which Cal/OSHA had cited FFG in 2023 — and banged on the door for ten to fifteen minutes before a supervisor heard them.

On May 20, 2026, Cal/OSHA issued new Citations and Notifications of Penalty at both LAX-serving facilities (Inspection Nos. 1864909 and 1861761), with total proposed penalties of \$74,000. These include four “Serious” violations—most notably, at each facility, failure to ensure the cold storage room had a door openable from the inside and an alarm actuable from within (T8CCR §3249(a); \$18,000 per facility)—plus serious citations for missing emergency eyewash facilities at a battery charging station and an unguarded dishwasher chain drive, and a general violation for dishwasher maintenance failures stemming from a different fire in October 2025.

2. Applicable Safety Standards

Cal/OSHA has promulgated standards concerning health and sanitation in the workplace. Cal. Code Regs. tit. 8, Section 3203(a) requires that:

[E]very employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (Program). The Program shall be in writing and, shall, at a minimum: (2) Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices; (3) Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees; (4) Include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices...; (6) Include methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard...

Section 3362(a) requires that:

To the extent that the nature of the work allows, workplaces, storerooms, personal service rooms and passageways shall be kept clean, orderly and in a sanitary condition. The interiors, exteriors and environs of buildings that contribute to a hazard to which these orders apply shall be cleaned and maintained in such conditions as will not give rise to harmful exposure, as defined in Section 5140.

Section 3362(e) requires that:

All sweepings, putrescible wastes, refuse and garbage shall be removed in such a manner as to avoid creating a nuisance and shall be removed as often as necessary to avoid creating a menace to health through the development of unsanitary conditions.

Section 3362(f) requires that:

Every enclosed workplace and personal service room shall be equipped and maintained, insofar as is practicable, to prevent the entrance or harborage of insects, rodents or other vermin. An effective program of extermination and control shall be instituted whenever their presence is detected.

Section 3396(e)(2) requires the following:

(A) Engineering controls. Engineering controls shall be used to reduce and maintain both the temperature and heat index to below 87 degrees Fahrenheit when employees are present, or to reduce the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas, except to the extent that the employer demonstrates such controls are infeasible. When such controls are infeasible to meet the temperature and heat index thresholds, the employer shall: (1) Use engineering controls to reduce the temperature, heat index, or both, whichever applies, to the lowest feasible level, except to the extent that the employer demonstrates such controls are infeasible; and (2) Use engineering controls to otherwise minimize the risk of heat illness, except to the extent that the employer demonstrates such controls are infeasible.

(B) Administrative controls. Where feasible engineering controls are not sufficient to reduce and maintain the temperature and heat index to below 87 degrees Fahrenheit when employees are present or the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas, administrative controls shall be used to minimize the risk of heat illness, except to the extent that the employer demonstrates such controls are infeasible.

(C) Personal heat-protective equipment. Where feasible engineering controls are not sufficient to reduce and maintain the temperature and heat index to below 87 degrees Fahrenheit when employees are present or the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas and feasible administrative controls do not minimize the risk of heat illness, personal heat-protective equipment shall be used to minimize the risk of heat illness, except to the extent that the employer demonstrates that use of such equipment is infeasible.

Section 3380(f)(1) requires that:

The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall: (A) Select, and have each

affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment; (B) Communicate selection decisions to each affected employee; and, (C) Select PPE that properly fits each affected employee.

Section 3380(d) requires that “all required safety devices and safeguards” — including protective clothing and personal protective equipment for the hands and extremities — “be maintained in a safe, sanitary condition.”

Where respiratory hazards are present, Section 5144(a)(2) requires that:

Respirators shall be provided by the employer when such equipment is necessary to protect the health of the employee. The employer shall provide the respirators which are applicable and suitable for the purpose intended.

Section 3366(d) requires that:

Each lavatory shall be provided with running water and suitable cleansing agents. The water shall be available at temperatures of at least 85 [degrees Fahrenheit] in those instances where: (1) Substances regulated as carcinogens in these orders are used; or (2) Skin contact may occur with substances designated skin (S) in section 5155.

Section 3366(e) requires that:

Clean individual hand towels, or sections thereof, of cloth or paper or warm-air blowers convenient to the lavatories shall be provided.

Section 3368(d) requires that:

All facilities providing food or beverage service for employees shall be operated in accordance with sound hygienic principles. Food shall be processed, prepared, handled, served and stored in such a manner as to be protected against contamination and spoilage.

3. Workplace Safety Allegations

1. Allegations re: Outbreak of Maggots, Flies, and Mold

A worker at FFG has extensively documented what appeared to be an outbreak of maggots, flies, and mold in the ordinary course of the Company’s operations, endangering worker health and safety through potential exposure to harmful toxins, pathogens and parasites. As outlined above, outbreaks of vermin and mold violate 3203(a), 3362(a), 3362(e), and 3362(f).

On or around June 23, 2026, a longtime employee in the Dish Room department was directed by a supervisor to clean several dishes placed in a large cart. This cart had been left near the dishroom and had not been opened for a prolonged period of time. When this employee opened the cart, she found dozens of dishes covered in decomposing, mold-covered food. Many of the dishes contained what appeared to be live maggots and flies, producing an overwhelming stench. The worker requested that the dishes be discarded, but the supervisor refused, stating that he needed them to plate food for another upcoming flight.

It is well understood that exposure to mold can cause allergic reactions such as dermatitis and asthma, fungal infections, and symptoms of fatigue, headache, and other effects. Cal. Dep't of Pub. Health, *Molds in Indoor Workplaces* (Nov. 2005).¹ As the California Department of Public Health has explained: "There are no standards to say how much mold is hazardous to your health. There should not be visible mold growth or strong moldy odors in the workplace." *Id.* at 2.

The employee reported feeling disgust and physical discomfort from having to handle the mold-ridden dishes. She described stomach pain, a headache, and a strange sensation in her nose which she believed was caused by inhaling the fuzzy mold. She felt uncomfortable removing the excess food and was concerned about potential bacterial exposure. While the worker layered several pairs of gloves in an attempt to protect her skin while handling the noxious material, FFG did not assess the hazard or select and provide appropriate protective equipment for the task, as Section 3380(f) requires. Nor was she provided a mask or respirator to protect her respiratory system from inhaling mold spores and other airborne contaminants, despite the obvious health risks; this is protection Section 5144(a)(2) obligates the employer to provide when necessary to protect employee health.

The employee also expressed her concern that passing the dishes through the dishwashing machine could contaminate the water. Nevertheless, she was instructed to pass the dishes through the machine.

The employee took photos and videos of the dishes to document the apparent mold and maggots. We will submit the videos separately. Screen captures of the videos are below:

¹ Available at: www.cdph.ca.gov/Programs/CCDPHP/DEODC/OHB/HESIS/CDPH%20Document%20Library/molds.pdf.



Under California Code of Regulations, Title 8, Section 3362(a), employers are strictly mandated, to the extent feasible, to maintain all places of employment in a clean, sanitary, and orderly condition. Section 3362(e) requires removal of putrescible waste so as to avoid unsanitary conditions, and Section 3362(f) separately requires prevention and extermination of vermin.

2. Allegations re: Mold Growing on Dish Room Ceiling

Union representatives have observed and documented what appears to be mold growing in the ceiling of the dish room. Below is a photograph taken by a union representative on August 3, 2026:



The substance was noted to the Company by a representative of an airline conducting a walk-through who recognized it as mold, but a company representative was overheard by a worker appearing to deny that the black substance was mold.

For the reasons explained in the previous section, the presence of mold in the workplace poses a health risk and violates California safety standards.

3. Allegations re: Cockroach or Similar Vermin in the Workplace

At least three workers have alleged and documented what appears to be a cockroach or similar vermin in the workplace, potentially endangering worker health and implicating Sections 3203(a), 3362(a), 3362(e), and 3362(f) — which, when read together, impose a duty upon FFG to address and exterminate vermin infestations.

On or around June 24, 2026, one worker witnessed a cockroach on a wall near a trashcan in the Dish Room department. She took a video of the apparent cockroach. The video is attached as **Exhibit C**, and a screengrab from the video is provided below:



In an interview, the worker noted that in the Dish Room department, there is an area between a wall and Dish Washing Machine 1, where carts full of dirty dishes brought in from the kitchen can go unwashed for days or even weeks. That area generally has a fermented, decomposing smell and is often the site of apparent mosquitos, flies and cockroaches.

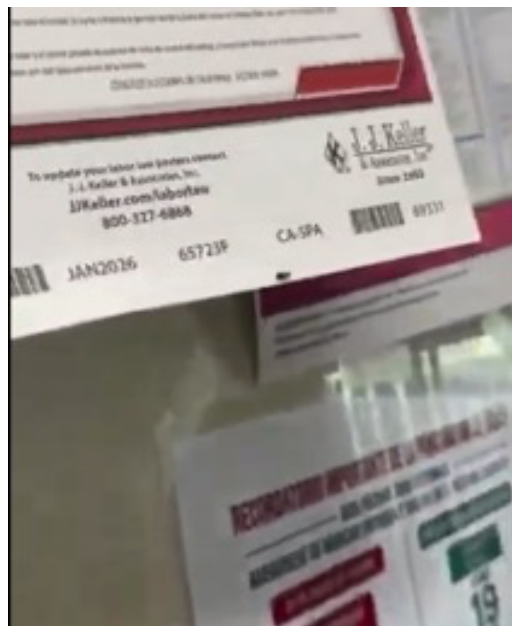
This worker has documented vermin she believes to be cockroaches in multiple other instances over the past eight months. On or around December 4, 2025, she took photos of what appear to be cockroaches she witnessed in the kitchen and on a cart from Lufthansa airlines. These photographs are shown below:



Two other workers corroborate and one has documented the presence of this apparent infestation of cockroaches at the facility. On or around July 6, 2026, a Cold Foods department worker witnessed what appeared to be a cockroach outside of the bathroom near the area where workers put on their aprons and hairnets. Below is the photo she took:



Similarly, on or around July 30, 2026, this worker witnessed what appeared to be a cockroach in a room near the cafeteria where workers clock in. The video is attached as **Exhibit D**, and a screengrab from the video is provided below:



A third worker also witnessed vermin she believed to be cockroaches on several occasions in separate areas of FFG's facility. She has witnessed what she believed to be

cockroaches in areas of the kitchen where bread, meat, fruit, and peanuts are stored. She emphasized that she has also witnessed these apparent cockroaches inside the employee cafeteria, where workers take their lunch breaks and historically were mandated to consume their employer-provided meals.²

Cal. Code Regs. tit. 8, Sections 3203(a), 3362(a), 3362(e), and 3362(f) collectively mandate that employers maintain a sanitary workplace and actively exterminate vermin to protect worker health. Video, photographic, and testimonial evidence from multiple employees support the allegation that FFG failed to comply with these regulations. At least three workers have claimed that they witnessed cockroaches and two have documented the sightings throughout the facility over an eight-month span, including sightings in December 2025 and June 2026 near kitchen airline carts and the Dish Room; July 2026 sightings near the employee changing area; and frequent sightings in food production zones and the employee cafeteria. Such conditions leave employees exposed to serious health risks caused by unsanitary working environments during their 8-, 10-, and 12-hour shifts.

4. Allegations re: Excessive Heat and Illness in the Dish Room

Section 3396 applies to all indoor work areas where the temperature equals or exceeds 82 degrees Fahrenheit when employees are present. Cal. Code Regs. tit. 8, § 3396(a). As quoted above, once the temperature or heat index equals or exceeds 87 degrees—or 82 degrees where employees wear clothing that restricts heat removal or work in high radiant heat areas—the employer must use feasible engineering controls to reduce the temperature, supplemented as necessary by administrative controls and personal heat-protective equipment. § 3396(e)(2).

The Dish Room is precisely such an environment: workers labor alongside industrial dishwashing machines emitting steam and radiant heat, in humidity so intense that clothing adheres to their skin, while in some cases wearing waterproof aprons and gloves that restrict heat removal. The lower 82-degree threshold for mandatory engineering controls therefore applies. Independent of these thresholds, Section 3396 also requires employers to provide access to fresh, cool drinking water and to cool-down areas maintained at less than 82 degrees. § 3396(c), (d).

A longtime employee in the Dish Room department reports having to work in an environment with dangerously high temperature where the environment is regularly like “being in a sauna.” The employee recounts that the heat, combined with humidity so intense that it causes the fabric of clothing to stick to workers’ skin, has caused her to experience fatigue, dehydration, headaches, and distress. There was reportedly an incident where a coworker almost

² Official Flying Food Group policy requires workers to consume meals provided by the Company in the employee cafeteria. However, enforcement of this policy has been inconsistent since workers have returned to the Inglewood kitchen after the January 6, 2025 fires that resulted in several Cal/OSHA citations.

fainted from the extreme heat. She notified a safety manager of the conditions in the Dish Room, but has not been provided a solution.

The extreme humidity, steam, and heat-restricting protective gear worn by Dish Room workers trigger Cal/OSHA Section 3396's lower 82-degree mandatory threshold for engineering controls. The reports of severe fatigue, headaches, and near-fainting incident—coupled with a complete lack of remedy after notifying management—demonstrate a violation of the employer's duty to maintain safe working conditions and provide required cool-down measures. This does not appear to be a situation where no engineering controls are feasible, as workers report that in some cases (possibly during times when the facility is undergoing inspections) the heat is not a problem but then reverts to intolerable temperatures. If true that tolerable temperatures are maintained during inspections, the employer clearly possesses the capacity to implement effective engineering controls but actively fails to maintain them, thus violating Cal/OSHA's heat protection provisions for workers.

5. *Allegations re: Insufficient or Nonexistent Handwashing Supplies in Facility Restrooms*

Sections 3366(d) and 3366(e) require employers to provide necessary hygienic measures in employee bathrooms and handwashing stations. At least four FFG workers allege that bathrooms are insufficiently stocked with soap or paper towels. Without proper sanitation and handwashing access, workers endanger themselves by facing increased exposure to dangerous foodborne illnesses.

At least four workers have testified that there are many occasions where there is no soap or paper towels provided or refilled in handwashing sinks throughout the facility and in the bathrooms. Two workers have also stated that they regularly leave the bathroom to search for soap elsewhere in the facility. One worker reports having had to remind management multiple times to refill the soap and paper towels used by workers in the Employer's kitchens, and reports witnessing other workers reminding their managers of the same.

6. *Allegations re: Unsanitary Employer-Provided Food for Workers*

Workers at FFG consume lunch provided by the Company. We understand that it is the company's policy that workers are not allowed to bring in their own food (although, as noted in footnote 2 above, this policy has not been consistently enforced since the fire on January 6, 2026 and the subsequent kitchen repairs). As a result, many employees working 8-, 10-, and 12-hour shifts are dependent on Flying Food Group for any sustenance. Despite this historical dependence, workers have reported serious concerns regarding the food provided by Flying Food

Group. These conditions, described below, implicate Section 3368(d), which outlines employer responsibilities for the hygienic provision of employee meals.

One former employee, for instance, shared a recent incident where cooks brought a leftover tray of rice prepared for an international flight. This worker witnessed what appeared to be dirt or some other non-consumable debris fall on top of the rice. The cooks, however, simply scooped out the dirty portion of the rice and sent it to the employee cafeteria for FFG workers to consume. On other occasions, management instructed this former employee to bring bread the worker believed to be expired and/or stale from the production floor to the cafeteria for staff consumption.

Similarly, on or around May 2026, a worker ate what she believed to be expired pork ribs during her lunch break. She noted the meat had a weird taste. At the time, she chalked this up to the seasoning that was used. Later that day, however, she began feeling sick and experienced symptoms of vomiting and diarrhea for three days. She reported this incident to management. After she made the report, one of the chefs approached her and informed her that the chef was aware the pork ribs were expired and had refused to cook them, but that another coworker had nevertheless cooked and served the pork ribs to FFG employees.

On February 11, 2026, the County of Los Angeles Public Health found a “major” violation related to maintaining “proper hot and cold holding temperatures.” Based on the records available, it is not clear which kitchen within the Flying Food Group facility this reported violations related to.

vii. Other Concerns

We have also identified other concerns about which we review in less detail here but are able to provide additional information as may be helpful. These include the following allegations:

1. *Defective Truck Chillers & Excess Dry Ice:* The chillers in the delivery trucks are broken or non-functioning. To compensate for the lack of refrigeration, management is overusing dry ice to maintain food temperatures. This creates burn hazards for drivers who are already denied essential protective gear.
2. *Missing Dry Ice Protective Gear:* Drivers are not being provided with required dry ice gloves, forcing them to use paper napkins and causing chemical/thermal skin burns.
3. *Kitchen & Storage Overcrowding:* Severe overcrowding in the Cold Food department and Hot Kitchen during the 3:00 PM shift overlap, as well as congestion near the dish

room offloading area between 3:00 PM and 6:00 PM. Additionally, the storage coolers on the side are overcrowded with equipment, blocking pathways and creating severe safety hazards. Management is also holding incoming shift workers in the cafeteria until airline inspection teams leave.

4. *Restroom Overcrowding*: Severe lack of adequate facilities, causing crowding in the bathrooms during peak morning hours (9:00 AM–10:00 AM).
5. *Cooler Slip/Fall Hazards*: Standing water on cooler floors presents severe slip-and-fall hazards for workers, leading to many injuries.

viii. *Allegations re: Failure to Maintain an Effective Injury and Illness Prevention Program*

The incidents described above are not isolated lapses; collectively, they demonstrate that FFG has failed to establish, implement, and maintain an effective Injury and Illness Prevention Program as required by Section 3203(a). Workers have repeatedly identified hazards through the channels available to them—and FFG's response has too often been to override or ignore them. When a Dish Room employee asked that decomposing, maggot-infested dishes be discarded, her supervisor refused and directed that they be washed and reused. When a chef allegedly identified expired pork ribs and refused to cook them, the meat was cooked and served to employees anyway, sickening at least one worker. When a Dish Room employee allegedly reported dangerous heat conditions to a safety manager, no sustainable corrective action followed. When workers have alerted management to empty soap and towel dispensers, the problem has recurred. And a known harborage area beside Dish Washing Machine 1, where soiled dishes accumulate for days or weeks, persists uncorrected. Moreover, as reviewed at the outset, the Company has a record of violations of safety standards involving a dozen citations from Cal/OSHA over the last several years. These facts indicate that FFG lacks functioning procedures for identifying and evaluating workplace hazards, § 3203(a)(4), and for correcting unsafe or unhealthy conditions in a timely manner, § 3203(a)(6) — failures that underlie each of the specific hazards described in this complaint.

2. INVESTIGATION PROCEDURES

As noted above, Complainants request that a thorough site inspection of the facility be conducted. Given the serious nature of the issues discussed here, we ask this inspection be conducted on an expedited basis. Additionally, we are aware that some of the matters raised here may not be effectively investigated by simply requesting copies of paperwork from the Respondent. Accordingly, Complainants are willing to provide Cal/OSHA with additional information to assist with the investigation, including supplying video recordings and

photographs, and arranging for Cal/OSHA to meet privately with the Complainants and additional employees.

As the designated employee representative for the Complainants, we request to be notified of and included in the Opening and Closing Conferences, as well as any post-citation Informal Conference, with Cal/OSHA and affected employees if the employer insists on separate conferences. As the designated employee representative, we also request “walkaround” rights to accompany an inspector on the tour of inspection pursuant to Labor Code § 6314(d).

Please contact me in regard to the substance of this complaint, including interviews with the complaining employees, the agency’s inspection, and any resulting citation. I can be reached at dtoppelberg@unitehere11.org or (617) 797-4648. Thank you for your attention to this matter.

Sincerely,

/s/

David Toppelberg
Legal Fellow
UNITE HERE Local 11