
SENATE COMMITTEE ON LABOR, PUBLIC EMPLOYMENT AND RETIREMENT
Senator Dave Cortese, Chair
2023 - 2024 Regular

Bill No: AB 1228 **Hearing Date:** June 28, 2023
Author: Holden
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Consultant: Alma Perez-Schwab

SUBJECT: Fast food restaurant franchisors and franchisees: joint liability

KEY ISSUES

Should the Legislature require fast food restaurant franchisors to share with its franchisees all civil legal responsibility and civil liability for the fast food restaurant franchisee's violations of specified labor and employment laws?

Should fast food restaurant franchisors be authorized to cure alleged violations within a specified time prior to a civil action against them commencing?

Should there be a rebuttable presumption that any changes in the terms of a franchise that increase the costs to franchisees create a substantial barrier to compliance with specified labor and employment laws?

ANALYSIS

Existing law:

- 1) The California Occupational Safety and Health Act, assures safe and healthful working conditions for all California workers by authorizing the enforcement of effective standards, assisting and encouraging employers to maintain safe and healthful working conditions, and by providing for research, information, education, training, and enforcement in the field of occupational safety and health. (Labor Code §6300)
- 2) Establishes the Division of Occupational Safety and Health (known as Cal/OSHA) within the Department of Industrial Relations (DIR) to, among other things, protect and improve the health and safety of workers by proposing, administering, and enforcing occupational safety and health standards, providing outreach, education, and assistance, and issuing permits, licenses and registrations. (Labor Code §140 et seq.; §6300 et seq.)
- 3) Establishes, also within DIR, the Division of Labor Standards and Enforcement (DLSE) under the direction of the Labor Commissioner (LC) and authorizes them, as specified, to investigate employee complaints and enforce labor laws. (Labor Code §79 et seq.)
- 4) Authorizes citations to be issued to employers when Cal/OSHA has evidence that an employee was exposed to a hazard in violation of any requirement enforceable by the division, including the exposing, creating and controlling employer. (Labor Code §6400)

- 5) Prohibits a person from discharging or in any manner discriminating against any employee because the employee, among other things, reported a work-related fatality, injury, or illness, requested access to occupational injury or illness reports and records, or exercised any other rights protected by the federal Occupational Safety and Health Act (29 U.S.C. Sec. 651 et seq.), as specified. (Labor Code §6310)
- 6) Prohibits an employee from being laid off or discharged for refusing to perform work in violation of prescribed safety standards, where the violation would create a real and apparent hazard to the employee or fellow employees. (Lab. Code, § 6311)
- 7) Requires the LC and authorized deputies and representatives, upon the filing of a claim by an employee, as specified, to, among other things, take assignments of:
 - a. Wage claims and incidental expense accounts and advances.
 - b. Mechanics' and other liens of employees.
 - c. Claims based on "stop orders" for wages and on bonds for labor.
 - d. Claims for damages for misrepresentations of conditions of employment.
 - e. Claims for penalties for nonpayment of wages.
 - f. Claims for vacation, severance, or other supplemental compensation, as specified.
 - g. Claims for loss of wages as the result of discharge from employment for the garnishment of wages.
 - h. Claims for loss of wages as the result of demotion, suspension, or discharge from employment for lawful conduct occurring during nonworking hours away from the employer's premises.
(Labor Code §96)
- 8) Establishes the Private Attorneys General Act (PAGA), which, among other things, authorizes an aggrieved employee to bring a civil action to recover specified civil penalties that would otherwise be assessed and collected by the Labor and Workforce Development Agency (LWDA), on behalf of the employee and other current or former employees for certain violations of the Labor Code. (Lab. Code, § 2698 et seq.)

This bill:

- 1) Makes various findings and declarations regarding the fast food restaurant industry, and the degree of employment law violations found in the industry, as well as the role of franchisors in facilitating these violations.
- 2) Requires a fast food restaurant franchisor to share with its fast food restaurant franchisee all civil legal responsibility and civil liability for the fast food restaurant franchisee's violations of specified state laws and orders or their implementing rules or regulations pertaining to, among other things, the following:
 - a. Regulation of unfair competition;
 - b. Employment discrimination;
 - c. Specified pay data reporting requirements;
 - d. Wages, hours, and working conditions;
 - e. Private Attorneys General Act (PAGA);
 - f. Workplace health and safety;
 - g. Orders issued by the Governor regarding employment standards, worker health and safety, or public health and safety; and

- h. Orders issued by a county or municipality regarding employment standards, worker health and safety, or public health and safety.
- 3) Permits the enforcement of laws, orders, rules, and regulations, as specified, against a fast food restaurant franchisor, including administratively or by civil action, to the same extent that they may be enforced against the fast food restaurant franchisor's franchisee.
- 4) Prohibits a civil action from being commenced against a fast food restaurant franchisor under the provisions of this bill prior to 30 days after written notice of the alleged violation of any of the laws and orders, as specified, or their implementing rules or regulations, has been given to the fast food restaurant franchisor by a person commencing the action.
 - a. Requires the time period to be extended to 60 days if a fast food restaurant franchisor, within 30 days of receiving a written notice, makes a written request to the noticing person for additional time to complete an investigation.
- 5) Protects a fast food restaurant franchisor from liability in a civil action, per these provisions, if the fast food restaurant franchisor cures the alleged violation within the applicable time period, as specified.
 - a. Defines "cure" to mean that the fast food restaurant franchisor abates each violation alleged and ensures that its fast food restaurant franchisee is in compliance with the underlying laws, orders, rules, or regulations specified in the notice, and that any fast food restaurant workers against whom a violation was committed are made whole.
- 6) Makes a waiver of these provisions, or any agreement by a fast food restaurant franchisee to indemnify its fast food restaurant franchisor for liability under these provisions, contrary to public policy and void and unenforceable.
- 7) Authorizes a fast food restaurant franchisee to file an action against its fast food restaurant franchisor for monetary or injunctive relief necessary to ensure compliance if the terms of a fast food restaurant franchise prevent or create a substantial barrier to a fast food restaurant franchisee's compliance with the laws and orders set forth pursuant to 2) and their implementing rules and regulations, or any changes to them, including, but not limited to, because the franchise does not provide for funds sufficient to allow the fast food restaurant franchisee to comply with the laws, orders, rules, and regulations, or any changes to them.
- 8) Establishes a rebuttable presumption that any changes in the terms of a franchise that increase the costs of the franchise to the fast food restaurant franchisee create a substantial barrier to compliance with the prescribed laws and orders and their implementing rules and regulations, or any changes to them.
- 9) For purposes of these provisions, defines the following, among other, terms:
 - a. "Fast food chain" means a set of restaurants consisting of 100 or more establishments nationally that share a common brand, or that are characterized by standardized options for decor, marketing, packaging, products, and services.
 - b. "Fast food restaurant" means any establishment in the state that is part of a fast food chain and that, in its regular business operations, primarily provides food or beverages in the following manner:

- i. For immediate consumption either on or off the premises.
- ii. To customers who order or select items and pay before eating.
- iii. With items prepared in advance, including items that may be prepared in bulk and kept hot, or with items prepared or heated quickly.
- iv. With limited or no table service. Table service does not include orders placed by a customer on an electronic device.

COMMENTS

1. Background: Workplace Health and Safety of Fast Food Workers

California employers have a legal obligation to provide and maintain a safe and healthful workplace for their employees as well as abide by minimum wage and labor standards required under the Labor Code. In spite of these protections, wage theft and labor law violations continue to be a problem many workers face.

According to a U.S. Bureau of Labor Statistics report from 2021, California is one of the states with the highest levels of employment in the fast food industry. California fast food and counter workers earn an average hourly mean wage of \$15.61 amounting to an annual mean wage of \$32,640.¹ A report by the UC Berkeley Labor Center found that despite high levels of employment in the fast food industry, “People working in fast-food jobs are more likely to live in or near poverty. One in five families with a member holding a fast-food job has an income below the poverty line, and 43 percent have an income two times the federal poverty level or less. Even full-time hours are not enough to compensate for low wages. The families of more than half of the fast-food workers employed 40 or more hours per week are enrolled in public assistance programs.”²

Occupational safety and health also appears to be struggling, especially because of the continuing impacts of COVID-19. A University of California Los Angeles Labor Center report, “*The Fast-Food Industry and COVID-19 in Los Angeles*,” reveals that the food service sector in particular, is a common vector of COVID-19 transmission. Research published early in 2021 found that cooks had the highest increase in mortality—up by 39% from 2019—of any occupation during the pandemic. Additionally, the report found that “Fast-food workers face an array of workplace challenges. More than half experienced wage theft, such as being paid late or unpaid overtime rates, denied meal breaks or reimbursement for uniforms or equipment. Workers also reported insufficient hours to make ends meet. More than half experienced a health and safety hazard, and 43% were injured at work. Half of workers faced verbal abuse, particularly from customers. Many also witnessed or experienced violence or harassment, such as racial slurs, assault, and robbery.”³

Additionally, another report by the Center for American progress found that “60 percent of fast-food workers in California are Latinx, more than 80 percent are nonwhite, two-thirds are women, and 20 percent have children. The typical fast-food worker brings in one-third of

¹ U.S. Bureau of Labor Statistic. Occupational Employment and Wages, May 2021.

² Allegretto, Sylvia, et al. *Fast Food, Poverty Wages: The Public Cost of Low-Wage Jobs in the Fast Food Industry*. UC Berkeley Labor Center, October 2013.

³ Justice, Brian, et al. *Fast Food Frontline: COVID-19 and Working Conditions in Los Angeles*. UCLA Labor Center, January 2022.

their family's income, and more than half of fast-food worker households spend more than 30 percent of their income on rent.”⁴

2. Franchisor and Franchisee Business Model & Joint Liability:

The business model of a franchise consists of one where one business owner (“franchisor”) sells the rights to their business logo, name, and model to an independent entrepreneur (“franchisee”). Restaurants, hotels, and service-oriented businesses are commonly franchised. Two common forms of franchising are:

- *Product/trade name franchising*: The franchisor owns the right to the name or trademark of a business, and sells the right to use that name and trademark to a franchisee. This style of franchising normally focuses on supply chain management. Typically, products are manufactured or supplied by the franchisor and delivered to the franchisee to sell.
- *Business format franchising*: The franchisor and franchisee have an ongoing relationship. This style of franchising normally focuses on full-spectrum business management. Typically, the franchisor offers services like site selection, training, product supply, marketing plans, and even help getting funding.

Franchising grants entrepreneurs, through the payment of a fee, the right to use the name, logo, and products of a larger brand benefiting from brand recognition, promotions, and marketing. However, it also means the entrepreneur will have to follow brand rules about how to run their business and these vary and are determined by the contract to which the parties enter with the franchisor. The franchisor does not own the particular establishment, but rather owns the brand and effectively licenses it to the franchisee who operates the establishment. The franchisee's degree of autonomy can vary, but it is determined largely by the contract and any operational or training guidelines provided by the franchisor. According to the opposition, California has over 15,000 franchised restaurants that employ over 500,000 people across the state.

Franchisor and Franchisee Joint Liability

This bill would require a fast food restaurant franchisor to share with its fast food restaurant franchisee all civil legal responsibility and civil liability for the fast food restaurant franchisee's violations of specified labor and employment laws and order. This provision essentially makes franchisors and franchisees “joint employers” responsible for ensuring that wage and hour and workplace safety laws and regulations are followed at every level of employment. According to opponents of the measure, this change in the law would dismantle the restaurant franchise model in California. As noted above, the franchise model affords a franchisee some degree of autonomy, depending on the terms and conditions entered into with the franchisor. This bill would require the franchisor to take on the responsibility of ensuring labor law compliance by its contracted franchisees.

Joint liability, although an ambitious undertaking, is not unprecedented. Existing Labor Code § 218.7 extends liability for unpaid wages, interest and benefits to a “direct contractor,” as defined, for any debt owed to a wage claimant or third party that is incurred by a

⁴ Madland, David. *Raising Standards for Fast-Food Workers in California*. Center for American Progress, April 2021.

subcontractor at any tier, as specified. Essentially, holding general contractors and subcontractors jointly liable for unpaid wages, including fringe benefits, and authorizes civil actions to enforce the joint liability. Additionally, existing Labor Code §2673.1 specifies that a garment manufacturer, contractor, or brand guarantor who contracts with another person for the performance of garment manufacturing operations shares joint and several liability with any manufacturer and contractor for the full amount of unpaid wages, and any other compensation, including interest, due to any and all employees who performed manufacturing operations for any violation, attorney's fees, and civil penalties, as specified.

Existing case law on the matter, however, has generally refused to hold franchisors accountable for a franchisee's failure to comply with labor laws (see Assembly Judiciary Committee analysis of AB 257 (Holden, 2022) for more background information on this).

3. Who is the employer? Joint-employer rules at question at the federal level

Federal Trade Commission Investigating Franchisor Control

A March 10, 2023 press release from the Federal Trade Commission sought public input on franchise agreements and franchisor business practices, including how franchisors may exert control over franchisees and their workers.⁵ Specifically, the FTC is interested in how franchisors disclose certain aspects and contractual terms of the franchise relationship, as well as the scope, application, and effect of those aspects and contractual terms. The press release notes, ““It’s clear that, at least in some instances, the promise of franchise agreements as engines of economic mobility and gainful employment is not being fully realized,” said Elizabeth Wilkins, Director of the FTC’s Office of Policy Planning. “This RFI [Request for Information] will begin to unravel how the unequal bargaining power inherent in these contracts is impacting franchisees, workers, and consumers.””

Through the RFI, the FTC asked franchisors, franchisees, current and past employees of franchisors and franchisees, government entities, economists, attorneys, academics, consumers, and other interested parties to weigh in on a wide array of issues that affect franchisees and their workers, including, among others, the franchisors’ control over the wages and working conditions in franchised entities, other than through the terms of franchise agreements. The FTC provided a 60-day window to provide comments and those have been posted online.

National Labor Relations Board (NLRB) Proposed Rule Change

As noted by the Assembly Labor and Employment Committee analysis of this bill, “The legal threshold for triggering a joint-employer relationship under labor law for liability has changed frequently in recent years, depending on the political composition of the NLRB. In September 2022, the NLRB announced that it was proposing to change the joint-employer standard.⁶ “The NLRB’s proposed rule would expand the factors that can establish a joint employment relationship to include indirect and unexercised control over the terms and conditions of a job. Companies would be considered joint employers if they co-determine

⁵ *FTC Seeks Public Comment on Franchisors Exerting Control Over Franchisees and Workers*. March 10, 2023. <https://www.ftc.gov/news-events/news/press-releases/2023/03/ftc-seeks-public-comment-franchisors-exerting-control-over-franchisees-workers>

⁶ Scheiber, Noam. *Labor Board Proposes to Increase Legal Exposure for Franchised Chains*. New York Times, September, 2022.

‘essential terms and conditions of employment,’ such as scheduling, wages, and benefits.”⁷ Under the previous joint-employer rule set by the NLRB, “the parent company could be held liable for such labor law violations only if it exerted direct control over the franchisee’s employees — such as directly determining their schedules and pay.”⁸

4. AB 257 (Holden): FAST Recovery Act

AB 257 (Holden, Chapter 246, Statutes of 2022) enacted the Fast Food Accountability and Standards Recovery Act to, among other things, establish the Fast Food Council within the Department of Industrial Relations, with a sunset date of January 1, 2029, for the purpose of establishing sectorwide minimum standards on wages, working hours, and other working conditions related to the health, safety, and welfare of, and supplying the necessary cost of proper living to, fast food restaurant workers. In its original form, AB 257, in addition to other provisions, established the Fast Food Sector Council and held fast food franchisors jointly and severally liable for penalties or fines imposed on their franchisees. The sponsors of AB 257 (SEIU California) argued that “fast food franchisees – the small business owners who operate the vast majority of fast food locations in the state - struggle under a franchise system where global corporations set most of the terms and receive most of the profits while leaving franchisees solely liable for labor law compliance. Even well-meaning franchisees often find themselves squeezed to the point of cutting corners and skirting laws at the expense of worker pay and safety.”

Ultimately, the joint and several liability language was amended out of the FAST Recovery Act [AB 257], and the bill was signed into law in September 2022. On January 24, 2023, a group known as the Save Local Restaurants coalition successfully gathered a sufficient amount of valid voter signatures, verified by the California Secretary of State, which allowed them to place a referendum to overturn the FAST Recovery Act on the 2024 ballot.⁹ The qualification of the referendum for the 2024 ballot effectively suspends implementation of the FAST Act until California voters decide whether or not to repeal the law in 2024.¹⁰

5. Need for this bill?

This bill would require a fast food franchisor to share responsibility and liability for their franchisee’s violations of a number of specified labor and employment laws and orders. In an attempt to ensure equitable enforcement, the bill requires any individual who seeks to bring a civil claim to first give 30 days’ written notice of the alleged violation to the franchisor. During this time, the franchisor would have the opportunity to investigate the alleged violation and would have the ability to extend the timeline by 60 days, if needed, to complete the inquiry. The franchisor would then be allowed to cure the alleged violation and, if cured, would no longer be subject to liability under these provisions.

According to the author, “AB 1228 is a bill aimed at protecting workers and supporting local businesses by ending corporations’ ability to exploit the franchise system. As a former fast-

⁷ Iafolla, Robert, et al. *Labor Board Proposes Tossing Trump Joint Employer Regulation (3)*. Bloomberg Law, September 2022.

⁸ Scheiber, Noam. *Labor Board Proposes to Increase Legal Exposure for Franchised Chains*. New York Times, September, 2022.

⁹ Hussain, Suhauna. *Californians to vote on overturning a new law that could raise fast-food worker wages*. Los Angeles Times, January 2023.

¹⁰ Ibid.

food franchisee, I know how much pressure maintaining a safe and healthy working environment puts on local owner-operators, especially when global corporations refuse to contribute their share.”

6. Proponent Arguments:

According to the sponsors of the measure, SEIU California and the Fight for \$15 and a Union, “Rather than take responsibility for the conditions they have created, corporate franchisors have designed the franchise system to shield themselves from liability for labor violations. These billion-dollar corporations have written the rules so that they can enjoy maximum control and maximum profits while leaving small businesses owners and workers to fend for themselves. This power imbalance hurts local economies as well as California taxpayers, who foot a bill of \$4 billion annually for the portion of social safety net programs that subsidize the fast-food industry’s workers.”

Proponents argue that, “AB 1228 marks a pivotal next step in California fast-food workers’ fight for respect and a stronger voice on the job. Last year, Gov. Gavin Newsom signed AB 257, the FAST Recovery Act, creating a statewide Fast Food Council that brings together fast-food employers, workers and state regulators to work together to improve conditions in the industry. To skirt accountability and delay implementation of AB 257, fast-food corporations have funneled millions of dollars into a deceptive and misguided campaign to overturn the landmark labor law.

California has led the nation in recovering from the economic crises of the past few years. In order to continue building a more equitable California, we must look to creative ways to support our small businesses and frontline workers. Currently, California fast-food workers and franchisees lack adequate power and protections necessary to hold global fast-food companies accountable. The Fast Food Corporate Franchisor Responsibility Act aims to protect workers and support local business by ending corporations’ ability to exploit the franchise system that has created so many jobs in our communities. For this reason, we ask that you support this bill when it is heard in front of your committee.”

They conclude by stating that, AB 1228, “will improve conditions across the state’s fast-food restaurants by ensuring global fast-food corporations share liability for health and safety violations at franchise locations.”

7. Opponent Arguments:

The measure is opposed by a large coalition of franchisor employers, including the International Franchise Association, California Chamber of Commerce & California Restaurant Association, among others. They argue that “While the purported purpose of the legislation of providing safe working standards is something we all support and strive to provide on a daily basis, AB 1228 equates to a dismantling of the franchise business model in California.” They continue, “During a time when all small franchised business owners are doing everything possible to keep the lights on and the doors open coming out of the COVID-19 pandemic, this legislation is ill- timed and would do more to hurt businesses and their employees than help them.”

According to the coalition, “These independently-owned and operated businesses employ workers in a range of jobs – from those just entering the workforce to managers to

specialized professionals. Recent statistics show growing numbers of women and minorities owning franchise establishments, underscoring the importance of preserving the small business franchise model to promote minority and female entrepreneurship as well as continuing an economic recovery from the pandemic.” They argue that “this potential for continued growth is threatened by a common misconception of the franchise business model. This misconception, which clearly serves as the underpinning of AB 1228 is that the owner of the franchise brands – the “franchisors” – actually own and operate the stores and make employment decisions for them. In reality, franchise establishments across the state are locally owned small businesses operating under a national brand or identity. The local business owners are in charge of all employment decisions, including hiring, firing, wages and benefits. It is the local franchisee who owns and operates the establishment, not the franchisor. In fact, the national brands have no role whatsoever in determining wages or any other day-to-day operations of a franchisees’ employees and/or employment practices of a franchisee.”

They argue that, “With establishment of joint liability of franchisors by AB 1228, California is making a *per se* determination that franchisors are the joint employers of franchisees. In doing so, California is also making a *per se* determination that these owners and entrepreneurs are not small business owners, but middle managers of large corporations. These small business owners made the decision to get into business for themselves. If AB 1228 is signed into law, California would be removing the equity and livelihood of business owners that make the franchise model a melting pot of entrepreneurship.” Additionally, they argue, “passage of AB 1228 would make California an outlier: no other city, state or federal government has passed or even contemplated a similar law, primarily due to the realization that franchisors do not in fact employ those who work in a franchisee’s establishment. The *per se* liability imposed by AB 1228 is unprecedented at any level of government and completely ignores the case-by-case factual analysis that is required, and which has been used in this context in the past.”

Opponents conclude by stating that, “Independent franchisees are no different than any other independent business owner, and despite what AB 1228 is attempting to do, the legal, contractual, operational, and economic realities of the relationship will not change. AB 1228 will impose a *per se* liability rule on entities and principals that have no role whatsoever in the issues addressed in the legislation.”

8. Double Referral:

This bill has been double referred and if approved by this Committee today, will be sent to Senate Judiciary Committee for a hearing.

9. Committee Consideration:

Fast food workers serve on the front lines of our economy even during the dangers of the historic COVID-19 pandemic. The pandemic has exacerbated issues in what was already a low-paid sector of employment. With this bill, the author and proponents put at question the level of control that franchisors currently have over franchisees and whether or not they should be held liability for labor violations of the franchisees, whether or not they knew about them. The sponsors argue that “these billion-dollar corporations have written the rules so that they can enjoy maximum control and maximum profits while leaving small businesses owners and workers to fend for themselves. This power imbalance hurts local

economies as well as California taxpayers.” Additionally, a 2021 report by the Center for American Progress states, “The franchising model not only tends to drive down labor standards but also creates conditions that make raising standards particularly difficult. Many of the individual franchises have little ability to raise wages on their own, even if they wanted to. Their franchise agreements dictate many of their business decisions and provide little room to make profits with higher labor costs.”¹¹

As mentioned previously, this level of control is something currently being explored by the Federal Trade Commission. If in fact the franchisor is imposing such strict rules and guidelines upon franchisees, such that it creates pressures on the franchisee to meet those obligations and indirectly impacts their ability to meet payroll responsibilities or leads to them cutting corners on other employment safety and work conditions, then perhaps being jointly liable makes sense.

Should the bill move forward, the author may wish to consider additional protections for franchisees that could face franchisor contract terminations as a result of the imposition of joint liability. Specifically, addressing any franchisor termination or declined renewal of the franchise for the purpose of seeking to avoid responsibility or liability for the labor and employment laws specified in this bill.

10. Prior Legislation:

AB 257 (Holden, Chapter 246, Statutes of 2022) enacted the Fast Food Accountability and Standards Recovery Act to, among other things, establish the Fast Food Council within the Department of Industrial Relations, with a sunset date of January 1, 2029, for the purpose of establishing sectorwide minimum standards on wages, working hours, and other working conditions related to the health, safety, and welfare of, and supplying the necessary cost of proper living to, fast food restaurant workers. AB 257 is currently suspended pending the 2024 ballot proposition to overturn the law.

SUPPORT

Fight for \$15 and a Union (Co-Sponsor)
SEIU California (Co-Sponsor)
Alameda Labor Council
California Alliance for Retired Americans
California Labor Federation, AFL-CIO
California Rural Legal Assistance Foundation, INC.
Clergy and Laity United for Economic Justice
Courage California
Indivisible Sacramento
Indivisible San Francisco
Indivisible Yolo
NorCal Resist
North Bay Jobs With Justice
North Bay Labor Council

¹¹ Madland, David. *Raising Standards for Fast-Food Workers in California*. Center for American Progress, April 2021.

Our Revolution
Our Revolution North Bay Jobs with Justice
PowerSwitch Action
Santa Clara County Wage Theft Coalition
The Restaurant Opportunity Center of The Bay
Voices for Progress
Worksafe

OPPOSITION

Alhambra Chamber of Commerce
Amador County Chamber of Commerce
Arby's
Asian McDonald's Operators Association
Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship
Bad-Ass Breakfast Burritos
Baskin-Robbins
Bay Area Council
Bay Area Salvadoran American Chamber of Commerce
Brea Chamber of Commerce
Buffalo Wild Wings
CalAsian Chamber of Commerce
California African American Chamber of Commerce
California Business Properties Association
California Business Roundtable
California Chamber of Commerce
California Fuels and Convenience Alliance
California Hawaii State Conference of the NAACP
California Hispanic Chambers of Commerce
California Lawyers Association, Business Law Section
California McDonald's
California Restaurant Association
California Retailers Association
California Small Business Association
Campbell Chamber of Commerce
Carlsbad Chamber of Commerce
Central Valley BizFed
Chick-fil-A
Chino Valley Chamber of Commerce
Civil Justice Association of California
Coalition of California Chambers – Orange County
Corona Chamber of Commerce
Dave's Hot Chicken
Del Taco
Deli Delicious
Diversified Restaurant Group
Dog House
Dunkin'
El Dorado County Chamber of Commerce

El Dorado Hills Chamber of Commerce
El Pollo Loco
Elk Grove Chamber of Commerce
Elmer's Breakfast·Lunch·Dinner
Family Business Association of California
Folsom Chamber of Commerce
Fountain Valley Chamber of Commerce
Fresno Chamber of Commerce
Gilroy Chamber of Commerce
Glendora Chamber of Commerce
Greater Coachella Valley Chamber of Commerce
Greater Conejo Valley Chamber of Commerce
Greater High Desert Chamber of Commerce
Greater Los Angeles African American Chamber of Commerce
Greater Riverside Chamber of Commerce
Greater San Fernando Valley Chamber of Commerce
Guatemalan American Chamber of Commerce – San Francisco
Hispanic Chambers of Commerce of San Francisco
Hollywood Chamber of Commerce
Imperial Valley Regional Chamber of Commerce
International Franchise Association
Jack in the Box INC.
Jimmy John's
LA Cañada Flintridge Chamber of Commerce
Lake Elsinore Valley Chamber of Commerce
Latin American & Caribbean Business Chamber of Commerce
Latino Food Industry Association
Latino Restaurant Association
League of United Latin American Citizens (LULAC)
Lincoln Chamber of Commerce
Livermore Chamber of Commerce
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Los Angeles County Business Federation (LA BizFed)
Los Angeles Latino Chamber of Commerce
Manteca Chamber of Commerce
McDonald's
McDonald's Hispanic Owner-Operators Association
McDonald's Owner-Operators of California
McDonald's Women Operators Network
McDonald's Women Owners Network
Mission Viejo Chamber of Commerce
Modesto Chamber of Commerce
Murrieta-Wildomar Chamber of Commerce
National Action Network – Western Regional Conference
National Action Network – Sacramento Chapter
National Action Network – Los Angeles
National Action Network – Orange County
National Action Network – Oakland
National Action Network – San Bernardino County

National Action Network – Solano County
National Black McDonald's Operators Association
National Council of Chain Restaurants
National Federation of Independent Business
National Restaurant Association
Newport Beach Chamber of Commerce
Nicaraguan American Chamber of Commerce, Northern California
Oceanside Chamber of Commerce
Orange County Business Council
Palos Verdes Peninsula Chamber of Commerce
Pasadena Chamber of Commerce and Civic Association
Paso Robles Chamber of Commerce
Patterson- Westley Chamber of Commerce
Pizza Factory
Porterville Chamber of Commerce
Rancho Cordova Area Chamber of Commerce
Regional Chamber of Commerce San Gabriel Valley (RCCSGV)
Restaurant Brands International
Ridgecrest Chamber of Commerce
Riverside County Black Chamber of Commerce
Rocklin Area Chamber of Commerce
Roseville Area Chamber of Commerce
San Diego Regional Chamber of Commerce
San Francisco Filipino American Chamber of Commerce
San Joaquin County Hispanic Chamber of Commerce
San Jose Chamber of Commerce
San Juan Capistrano Chamber of Commerce
San Marcos Chamber of Commerce
Santa Ana Chamber of Commerce
Santa Barbara South Coast Chamber of Commerce
Santa Clarita Valley Chamber of Commerce
Santa Cruz County Chamber of Commerce
Santa Maria Valley Chamber of Commerce
Santee Chamber of Commerce
Shingle Springs/Cameron Park Chamber of Commerce
Simi Valley Chamber of Commerce
Solano County Black Chamber of Commerce
Sonic Drive-In
South Bay Association of Chambers of Commerce
Southern California KFC Franchisee Association
Southwest California Legislative Council
Subway
Tastee Freez
Templeton Chamber of Commerce
Teriyaki Madness
Torrance Area Chamber of Commerce
Tri-County Chamber Alliance
Tulare Chamber of Commerce
United Chamber Advocacy Network (UCAN)
United States Black Chamber of Commerce

United States Hispanic Chamber of Commerce
Valley Industry & Commerce Association
Vitality Bowls
Waba Grill
Walnut Creek Chamber of Commerce
Wendy's
Wienerschnitzel
Yorba Linda Chamber of Commerce
Yuba Sutter Chamber of Commerce
Yum! Brands

-- END --