



UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA
LOCAL UNION 751

July 14, 2023

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Re: Bid Solicitation #PW23-3 - Health, Dining and Housing Building, Project #PLY106

On behalf of members of Carpenters Local 751, which represents working men and women in Humboldt County, please accept this request for review of Sundt Construction, Inc. on California State Polytechnic University, Humboldt's ("Cal Poly Humboldt") Bid Solicitation #PW23-3 - Health, Dining and Housing Building Project #PLY106 ("Project").

In addition to our other duties as a labor organization, Local 751 monitors local construction projects to help ensure that fair and open competitive bidding practices are utilized and that taxpayers get the best value for their tax dollars. This is important because the policies underlying our State's competitive bidding laws act as a "guard against favoritism, improvidence, extravagance, fraud, and corruption; to prevent the waste of public funds; and to obtain the best result for the public."ⁱ Proper enforcement of these laws results in more responsible contractors bidding and performing construction jobs, reduces instances of health and safety problems, promotes the timely completion of the contracted work, and helps to ensure the final product is of the highest quality and value for the taxpayer dollar.

The purpose of this request is to provide Cal Poly Humboldt information regarding investigations, lawsuits, penalties, and fines brought or issued against Sundt Construction, Inc. The alleged actions or omissions by Sundt Construction, Inc.—including breach of contract, damages, fraud, over-charging, prevailing wage violations, and worker endangerment—occurred at projects that have similarities to Cal Poly Humboldt's Project, and may not have been fully documented in materials Sundt Construction, Inc. provided. We believe the

information described herein and documented in attachments hereto supports the conclusion that Sundt Construction, Inc. is not a responsible bidder, and therefore not eligible to be awarded the Project.

I. Sundt Construction, Inc.'s History of Wage Violations, Including At Least \$600,000 in Civil Wage and Penalty Assessments from California's Department of Industrial Relations

Sundt Construction, Inc. has history of subcontracting with low-road companies that commit wage theft on public works projects, including by failing to accurately report hours and by misclassifying workers. Since 2015, the California Department of Industrial Relations (DIR) has issued the following Civil Wage and Penalty Assessment violations against Sundt Construction, Inc.:

- In April 2015, the DIR issued a Civil Wage and Penalty Assessment on the San Diego State University Aztec Center project against Prime Contractor Sundt Construction, Inc. and Subcontractor Standard Drywall, Inc. for failing to accurately report actual hours worked, pay required overtime rates, and pay required Training Fund contributions for overtime worked and not reported. The DIR determined the total amount of wages due was \$13,286.50 and total penalties for the violations was \$15,875. [Attachment A]
 - And in July 2018, another Civil Wage and Penalty Assessment was issued on the South Campus Plaza San Diego State University project against Prime Contractor Sundt Construction, Inc. and Subcontractor Standard Drywall, Inc. for failure by the subcontractor to pay the required prevailing wage. DIR also issued a citation for failure by the subcontractor to employ apprentices for forty-nine (49) days. The DIR determined the total amount of wages due was \$341.63, while the total penalties for the violations was \$6,655. [Attachment B]
- In April 2017, the DIR issued a Civil Wage and Penalty Assessment against Prime Contractor Sundt Construction, Inc. and Subcontractor Monetz Glass, Inc. for failure to pay the prevailing wage, travel and subsistence on the California State University, East Bay project: Warren Hall Replacement Building. DIR also issued a citation for failing to submit Request for Dispatch of an Apprentice. The DIR determined the total amount of wages due was \$232,964.05 and total penalties for the violations was \$195,595. [Attachment C]
- In March 2017, the DIR issued a Civil Wage and Penalty Assessment on the San Jose State University Facilities & Development Operations project Campus Village Phase 2 against Prime Contractor Sundt Construction, Inc. and Subcontractor Green Growth Industries Inc. for failure to pay the correct prevailing wage. DIR also issued a citation for failure to pay

training funds and failure to notify, dispatch and employ apprentices. The DIR determined the total amount of wages due was \$2,812.68 and total penalties for the violations was \$3,840. [Attachment D]

- In December 2016, the DIR issued a Civil Wage and Penalty Assessment on the UC Merced Classroom Academic Bldg. Proj. 900290 project against Prime Contractor Sundt Construction, Inc. and Subcontractor Citadel Premium Design, Inc. for failure to pay the correct prevailing wage, and failure to pay travel time and mileage. The DIR also cited the parties for violations of failure to employ apprentices at the minimum ratio for the craft of Tile Finisher and Tile Setter. The DIR determined the total amount of wage due was \$5,612.71 and total penalties for the violations was \$5,245. [Attachment E]

Additionally, in April 2021, Sundt Construction, Inc. settled a class action lawsuit wherein Cody Wirbick – the class representative and plaintiff – accused the company of failing to provide accurate wage statements.ⁱⁱ

II. Sundt Construction, Inc. Has Been Sued by Public Universities and Others for Alleged Breach of Contract/Damages on Public Works Projects, Including Housing for U.S. Military

Sundt Construction, Inc. has also been sued by public universities and other entities who allege poor quality and workmanship by Sundt Construction, Inc. on public works projects. The following are examples of such suits:

- In February 2018, the University of California Regents filed a breach of contract civil suit against Sundt Construction, Inc., citing water intrusion as a result of construction overseen by Sundt Construction, Inc. at a seven-building student dormitory complex on the campus of UC Davis. In their complaint, the University of California Regents claimed to have conducted an extensive investigation that found unsuccessful attempts at repairs by Sundt Construction, Inc. In May 2019, the suit was settled for \$26.5 million.ⁱⁱⁱ
- In August 2021, Arizona State University (ASU) filed a civil lawsuit against Sundt Construction, Inc. that reportedly alleges Breach of Contract for a pool that was “poorly constructed...resulting in significant current damage.”^{iv} In the lawsuit, ASU stated its pool had several issues, including rusting, leaks and structural defects. The complaint cited outside experts who recommended the university close it due to “potential risk of failure.” The lawsuit also alleged there were code violations and the steel parts of the pool structure degraded and caused “premature failure.” As the steel work was deficient and failed to follow industry standards, ASU believed the contract to have been breached. To date, this case remains pending.

Finally, in an October 2018 letter the Office of the General Counsel of Texas Tech University System (TTUS) sent to Sundt Construction, Inc., TTUS noted Sundt’s involvement in the construction of their Medical Sciences Building II (MSB II) which was suspended due to “obvious concrete deflection.” TTUS also noted they had retained Wiss, Janney Elstner Associates, Inc (“WJE”) to evaluate the deflection and perform construction and wrote: ‘At this point, the estimated costs for services performed and to be performed by WJE is approximately \$450,000.’ [Attachment F]

III. Sundt Construction, Inc. Has Been Publicly Accused of Questionable Business Practices

Public records and lawsuits also show Sundt Construction, Inc. has been publicly accused of the following questionable business practices:

- In 2012, auditors from the California State University (CSU) released a report showing Chico State had been overcharged about \$29,000 during the construction of Sutter Hall, a CSU project on which Sundt Construction, Inc. was the general contractor. [Attachment G]
- In a September 2019 complaint, energy equipment manufacturer Zeeco, Inc. accused Sundt Construction, Inc. of fraud, unjust enrichment, and other related charges after Sundt Construction, Inc. had allegedly failed to pay for \$431,882.89 worth of duct burner equipment that was delivered to Sundt Construction, Inc. subcontractor Innova Global. Zeeco claimed they had not received any compensation for the equipment or subsequent equipment assistance from Sundt Construction, Inc. or Innova, which they estimated – based partially on Innova Global’s subsequent Chapter 15 bankruptcy filing – had either only been partially paid for the equipment or not paid at all by Sundt Construction, Inc. In October 2020, Zeeco Inc. filed a notice of settlement and the case was dismissed with prejudice.^v

IV. Other Litigation

The following table contains basic details regarding civil cases wherein Sundt Construction, Inc. has been named a party. We encourage Cal Poly Humboldt to do its due diligence.

Case Name	Court	Date Filed	Case Number	Type
WARREN RIXNER VS SUNDT CONSTRUCTION, INC	TX District & County - Bexar	5/22/2023	2023CI10137	EMPLOYMENT-DISCRIMINATION

Case Name	Court	Date Filed	Case Number	Type
NOVATO REAL ESTATE, LLC VS. SUNDT CONSTRUCTION, INC.	DE Superior - Kent	5/9/2023	K23M-05-013	MISS - Issuance of Subpoena
NOVATO CA REAL ESTATE, LLC VS. SUNDT CONSTRUCTION, INC.	DE Superior - Kent	5/9/2023	K23M-05-012	MISS - Issuance of Subpoena
NOVATO CA REAL ESTATE, LLC VS. SUNDT CONSTRUCTION, INC.	DE Superior - Kent	5/9/2023	K23M-05-010	MISS - Issuance of Subpoena
NOVATO CA REAL ESTATE, LLC VS. SUNDT CONSTRUCTION, INC.	DE Superior - Kent	5/9/2023	K23M-05-012	MISS - Issuance of Subpoena
NOVATO CA REAL ESTATE, LLC VS. SUNDT CONSTRUCTION, INC.	DE Superior - Kent	5/9/2023	K23M-05-009	MISS - Issuance of Subpoena
FARWEST INSULATION CONTRACTING vs. SUNDT CONSTRUCTION, INC.	CA Superior - Los Angeles County	4/19/2023	23PSCV01153	Contract/Warranty Breach
Salazar-Escobedo VS Sundt Construction Inc	CA Superior - San Diego	4/13/2023	202300015477	PI/PD/WD
Sundt Construction, Inc. V. Tokio Marine Grv Re, Inc.	United States District Court, California Eastern (Sacramento)	3/1/2023	2:23cv387	Diversity-Injunctive & Declaratory Relief
Sundt Construction, Inc. V. Tokio Marine Grv Re, Inc.	United States District Court, California Eastern (Sacramento)	3/1/2023	2:23cat202	Diversity-Injunctive & Declaratory Relief
KUHN JOHN Vs. BECHTEL POWER CORPORATION, SUNDT CORPORATION, INC., et al.	IL Circuit - St. Clair	1/9/2023	23-LA-14	ASBESTOS-NEGLIGENCE OVER \$50,000
Trinity Drywall & Plastering Systems, LP vs. Sundt Construction, Inc., Fidelity and Deposit Company of Maryland, Zurich American Insurance Company	TX District & County - Denton District	12/15/2022	22-10661-481	Debt/Contract: Debt/Contract
TRACY McINTYRE and EL PASO MOTORSPORTS, INC. d/b/a MOTO EL PASO VS. SUNDT CONSTRUCTION COMPANY, TEXAS DEPARTMENT OF TRANSPORTATION (TXDOT), et al	TX District & County - El Paso	10/19/2022	2022DCV3166	Other Injury or Damage
Sundt Construction, Inc. vs Weckworth Electric Group, Inc.	CA Superior - Santa Clara	10/3/2022	22CV403859	Other Petition (Not Spec) Unlimited

Case Name	Court	Date Filed	Case Number	Type
BRENDA HERRERA, INDIVIDUALLY, AS NEXT FRIEND OF CRT, A MINOR CHILD AND ON BEHALF OF THE ESTATE OF ARTURO TRINIDAD, DECEASED VS. SUNDT CONSTRUCTION, AND BIG CREEK CONSTRUCTION, LTD	TX District & County - El Paso	8/9/2022	2022DCV2287	Other Injury or Damage
Lawson Mechanical Contractors vs. Sundt Construction, Inc	CA Superior - Sacramento	6/13/2022	2022-00321625-CV	Breach of Contract/Warranty
Molina-Torres V. Sundt Construction, Inc. Et Al	United States District Court, Texas Western (El Paso)	3/7/2022	3:22cv78	Diversity-Personal Injury
Carlos Molina-Torres, v. Sundt Construction, Inc., Joseph Riccillo, and John Doe	TX District & County - El Paso	11/18/2021	2021DCV4058	Other Injury or Damage
Sundt Construction Inc VS 155 E Commerce Hotel LLC	TX District & County - Bexar (District Only)	8/26/2021	2021CI17626	OTHER DEBT/CONTRACT
Tyler Reinforcing, LLC VS Sundt Construction, Inc.	TX District & County - El Paso	8/20/2021	2021DCV2884	Other Civil
Chipman Corporation vs. Sundt Construction Inc, an Arizona corporation	CA Superior - Sacramento	6/7/2021	2021-00302135-CV	Breach of Contract/Warranty
Dublin CA Real Estate, LLC VS Sundt Construction, LLC	CA Superior - Alameda	4/16/2021	RG21096485	Other Petition (More than one party); General Civil
Iron Mechanical, Inc. vs Sundt Construction, Inc. et al	CA Superior - Santa Clara	1/27/2021	21CV37668	Breach of Contract/Warranty Unlimited
Sundt Construction, Inc. vs Sunnyvale Hotels, LLC et al	CA Superior - Santa Clara	1/14/2021	21CV376278	Breach of Contract/Warranty Unlimited
Hill V. Sundt Construction, Inc	United States District Court, Texas Northern (Dallas)	12/30/2020	United States District Court, Texas Northern	Job Discrimination (Race)
Tyler Harris v. John Douglas Hawkins AND Sundt Construction Inc	AZ Superior - Maricopa	11/23/2020	CV2020-096306	Civil
Talus Construction, Inc. et al vs Sundt Construction, Inc. et a	CA Superior - Santa Clara	10/20/2020	20CV372453	Breach of Contract/Warranty Unlimited
Coast Insulation Contractors, Inc. vs Sundt Construction, Inc.	CA Superior - Santa Clara	9/9/2020	20CV370460	Other Collections Unlimited (09)

Case Name	Court	Date Filed	Case Number	Type
Tower 180 Owner LLC v. Sundt Construction Inc	CA Superior - San Diego	8/17/2020	37-2020-00028707-CU-BC-CTL	Breach of Contract/Warranty
VISION SYSTEMS INC VS SUNDT CONSTRUCTION INC	CA Superior - San Diego	8/10/2020	202000028041	Breach of Contract/Warranty
Northern California Tile and Stone, Inc. vs Sundt Construction, Inc. et al	CA Superior - Santa Clara	7/16/2020	20CV368397	Breach of Contract/Warranty Unlimited (06)
Leedsman Construction, Inc. D/B/A Traffic Control Specialist V. Sundt Construction, Inc. Et Al	United States District Court, Texas Western (El Paso)	6/1/2020	3:20cv153	Petition for Removal-Breach of Contract
LEEDSMANN CONSTRUCTION, INC. dba TRAFFIC CONTROL SPECIALIST vs SUNDT CONSTRUCTION, INC. and ZURICH AMERICAN INSURANCE COMPANY	TX District & County - El Paso	5/4/2020	2020DCV1469	Contract - Consumer/Commercial/Debt
Veronica Garibay VS Sundt Construction, Inc. and Christopher Vizcarra	TX District & County - El Paso	3/19/2020	2020DCV1039	Injury or Damage - Motor Vehicle
Wirbick V. Sundt Construction	US District Court for the Eastern District of California	10/11/2019	2:19cv2067	Labor Litigation
Zeeco Inc V. Sundt Construction	CA Superior - San Bernardino	9/9/2019	CIVDS1926439	Other Civil Contracts
Guerror, Jr. V. Sundt Construction	US District Court for the Western District of Texas	8/15/2019	5:19cv993	Employment
Dianne Goldstein V. Sundt Construction	NV District - Clark	7/19/2019	A-19-798796	Other Civil Matters

Case Name	Court	Date Filed	Case Number	Type
Lexington Insurance Company V. DWI Architects and Planners, Sundt Construction, et al	AZ Superior – Maricopa	7/12/2019	CV2019-004585	Civil
Yolanda Escajeda vs Sundt Construction	TX District & County – El Paso	4/26/2019	2019DCV1572	Wrongful Termination, Civil
Jimmy Rodriguez vs Standard Drywall, Sundt Construction, et al	CA Superior – Los Angeles County	3/26/2019	19STCV10242	Wrongful Termination – Civil
Lawrence Lee Foltz V. Sundt Construction	TX District & County – El Paso	10/29/2018	2018DCV4073	Other Injury or Damage
John R Christopher V. Sundt Construction et al	TX District & County – El Paso	10/2/2018	2018DCV3613	Injury or Damage
Liberty Mutual Insurance Company V. Sundt Construction	Oregon Circuit Court, Multnomah County	9/10/2018	18CV39889	Tort
John Storie B Sundt Construction et al	Oregon Circuit Court, Multnomah County	9/10/2018	18CV39701	Tort

Case Name	Court	Date Filed	Case Number	Type
JR Ramon LLC V. Sundt Construction et al	TX District & County – Bexar	8/28/2018	2018CI16384	Other Civil Cases
Carr Construction v Sundt Construction et al	Oregon Circuit Court, Multnomah County	2/7/2018	18CV04483	Contract
Southern Star Concrete V. Sundt Construction	TX District & County - Dallas	1/24/2018	DC-18-00998	Civil
AMC East Communities , LLC V. Sundt Construction et al	US District Court for the District of Maryland	12/4/2017	8:17cv3598	Other Contract
Chaya Prasad V. Sundt Constuction et al	CA Superior – Los Angeles County	11/17/2017	KC069816	Other Non-Personal Injury/Property Damage tort (General Jurisdiction); Civil
Ronald L. Parks V Sundt Construction et al	TX District & County – El Paso	9/17/2017	2017DCV3146	Wrongful Termination; Civil
Edgar Ivan Rocha V Sundt Construction et al	TX District & County – El Paso	1/19/2017	2017DCV0178	Wrongful Termination; Civil
Bragg Investment Co., V. Sundt Construction., Et Al	CA Superior – Los Angeles County	12/7/2016	SC126783	Other Breach of Contract/Warranty

Case Name	Court	Date Filed	Case Number	Type
Gregory Ruiz V Sundt Construction	TX District & County – El Paso	6/14/2016	2016DCV2247	Wrongful Termination; Civil
Livermore Senior Living Associate V. Sundt Construction	CA Superior – Alameda	5/16/2016	RG16815926	Tort; General Civil
QIP Tuscon Office I LLC., V. Sundt Construction et al	US District Court for the District of Arizona	4/21/2016	4:16cv219	Breach of Contract
Walters Wholesale Electric V Sundt Construction et al	CA Superior – San Diego	4/18/2016	201600012631	Breach of Contract
Summit Electric Supply V Sundt Construction	TX District & County – Bexar	3/8/2016	2016CI04117	Debt/Contract
White v Sundt Construction et al	CA Superior – San Diego	2/29/2016	201600006559	Other; Civil
Acco Engineered Systems v Sundt Construction	CA Superior – Los Angeles	2/29/2016	BC612050	Breach of Contract/Warranty
Sara Moore v Sundt Construction et al	Oregon Circuit Court, Multnomah County	2/25/2016	16CV05886	Tort

Case Name	Court	Date Filed	Case Number	Type
Acco Engineered Systems Inc V Sundt Construction	CA Superior-Santa Clara	2/3/2016	16CV291139	Breach of Contract/Warranty
Ricardo Fernandez Jr V Sundt Construction et al	TX District & County - Bexar	1/25/2016	2016CI01224	Construction: Civil
Hugo Carrillo V. Sundt Construction et al	CA Superior – Los Angeles County	1/12/2016	BC606840	Premises Liability
Huntington Glazing Inv., V. Sundt Construction	CA Superior – San Diego	11/30/2015	201500039881	Breach of Contract/Warranty
Bayview Environmental Services V. Sundt Construction et al	CA Superior - Alameda	11/17/2015	RG15793594	Breach of Contract/Warranty
Bragg Investment Co., V. Sundt Construction	CA Superior – Orange	11/16/2015	2015-00820459	Breach of Contract/Warranty
Sunland Builders Inc., V Sundt Construction	US District Court for the Eastern District of North Carolina	10/27/2015	7:15cv243	Miller Act

Case Name	Court	Date Filed	Case Number	Type
Kings Equipment, LLC V. Sundt Construction et al	CA Superior – Los Angeles	10/26/2015	SC124913	Other Breach of Contract/Warranty
Columbia Fabricating Company V. Sundt Construction	CA Superior – Los Angeles County	8/12/2015	BC591186	Other Breach of Contract/Warranty
Parker Scott Thomas V. Sundt Construction	IL Circuit – Cook (LD)	6/2/2015	2015-L-062027	Petition to Issue Subpoena
M. Zapata V Sundt Construction et al	CA Superior – Santa Clara	4/8/2015	1-15-CV-279109	Other PI
Service Steel Warehouse Co LP V. Sundt Construction et al	TX District & County – El Paso	1/21/2015	2015DCV0189	Contract – Consumer/Commercial

V. Sundt Construction, Inc. Has Been Repeatedly Cited and Sued for Unsafe Worksite Conditions, Including Nine Serious Cal/OSHA Violations

Since 2013, Cal/OSHA has cited Sundt Construction, Inc. with twenty (20) violations and \$58,802 in penalties. Nine (9) of those violations were Serious violations, which OSHA defines “when the workplace hazard could cause an accident or illness that would most likely result in death or serious physical harm.” Sundt Construction, Inc. settled 15 violations (2 Serious) totaling \$45,890 in penalties.^{vi}

In 2006, the federal Environmental Protection Agency issued a \$9,000 penalty against Sundt Construction, Inc. for “an unauthorized discharge of storm water and/or failure to comply with

their storm water permit” for their facility at the U.S. Air Force Academy in Colorado Springs, CO.^{vii}

Additionally, Sundt Construction, Inc. has been repeatedly sued by workers for injuries they sustained at jobsites:

- In February 2016, Sara Moore filed a personal injury complaint against Sundt Construction, Inc. for an incident that occurred at a Sundt Construction, Inc. jobsite in Portland, OR circa February 2014 when she was working as an employee of Sundt Construction, Inc.’s subcontractor McDonald Excavating, Inc. Moore sustained injuries while working on a wall approximately 25 feet tall and wearing a safety harness with a lanyard/safety line, which got caught by an excavator that jerked her off the wall and drug her beneath the moving excavator. The complaint accused Sundt Construction, Inc. of being responsible, in part, because they “unreasonably created a foreseeable risk to a protected interest of the kind of harm that befell the plaintiff” by having an inadequate safety program. For her injuries, which included a concussion, post-traumatic syndrome, and multiple contusions, she sought \$450,000 and economic damages of \$35,751.53. In March 2017, plaintiff’s attorney reported to the court that the case was settled.^{viii}
- In July 2016, a Yuba County Superior Court jury awarded Joanne Turner – who worked on a jobsite that was run by Sundt Construction, Inc. and Capitol Iron Works, Inc. - \$5,263,486 for the negligence of Sundt Construction, Inc. and Capitol Iron Works Inc., which resulted in causing her to fall and suffer damages.^{ix}
- In 2013, Sundt Construction, Inc. was named as a defendant in a personal-injury lawsuit wherein plaintiff Fuaad Adan accused the company of digging a trench on a construction site where he was employed as a nighttime security officer. Adan alleged the trench was unmarked and, as a result, he fell into it and sustained serious injuries. This case was settled in 2015.^x
- In 2011, Sundt Construction, Inc. was named as a defendant in a civil suit wherein the plaintiffs, Michael and Lisa Kay Sigman, alleged the company and other defendants “negligently and carelessly controlled, supervised, managed, supplied materials and equipment, coordinated and performed work on the subject premises in such a manner as to expose workers on the premises to an unreasonable risk of harm,” including in that they “were warned of the danger or the unstable timbers but refused to correct this dangerous and defective condition, had sole control and a reasonable time to do so.” This case has been dismissed.^{xi}

CONCLUSION

In light of the issues described above, Local 751 respectfully urges Cal Poly Humboldt to reconsider Sundt Construction, Inc.'s status as an eligible entity for the Health, Dining and Housing Project.

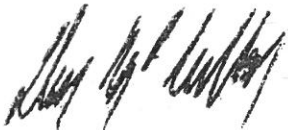
If Sundt Construction, Inc. did not disclose required information regarding their performance history, litigation history, civil wage and penalty assessments and safety and health violations, the governing body should not treat Sundt Construction, Inc. as an eligible entity. Cal Poly Humboldt has the right to revoke, rescind or review the status of a prime contractor. This is particularly true if any information provided by the contractor is misleading or inaccurate in any material manner or not accurately reported, even after a contractor has been deemed eligible.

Cal Poly Humboldt should also conduct a thorough inquiry into the issues raised in this letter to determine whether Sundt Construction, Inc. has the requisite quality, fitness, capacity, experience and trustworthiness to be a responsible contractor entitled to the award of the governing body's construction contract under the Public Contract Code.

Local 751 would appreciate notification of what steps Cal Poly Humboldt will take in this matter to fulfill this responsibility and to ensure compliance with the State's competitive bidding laws. We look forward to your response.

Thank you for your time and consideration to this very important matter.

Sincerely,



Dan McCulloch
Senior Field Representative
Carpenters Local 751

ⁱ M & B Const. v. Yuba County Water Agency (1999) 68 Cal.App.4th 1353, 1360; see also Domar Electric, Inc. v. City of Los Angeles (1994) 9 Cal.4th 161, 170-171.

ⁱⁱ United States District Court Eastern District of California, “Cody Wirbick, as an individual and on behalf of all others similarly situated, Plaintiffs, vs. Sundt Construction, Inc., an Arizona corporation; and DOES 1 through 50, inclusive, Defendants,” via Impact News Service, 04/15/2021

ⁱⁱⁱ Superior Court of the State of California County of Yolo, The Regents of the University of California v. Sundt Construction, Inc., et al., Case No. CV18-286, “Points & Authorities in Support of Motion for Determination of Good Faith Settlement,” Filed 06/10/2019

^{iv} The Arizona State Press, “ABOR Files Lawsuit Against Company that Constructed Downtown SDFC,” September 13, 2021

^v Superior Court of the State of California County of San Bernardino, Zeeco, Inc., v. Sundt Construction, Inc.; New-Indy Ontario, LLC; DOES 1 through 200, inclusive, Case No. CIV-DS-1926439, “Complaint,” Filed 09/09/2019

^{vi} OSHA Enforcement Establishment Database, “Sundt,” <https://www.osha.gov/pls/imis/establishment.html>, Accessed: 04/19/2022

^{vii} EPA, Enforcement and Compliance History Online (ECHO), ICIS FE&C, Downloaded on 04/07/2022, <http://echo.epa.gov/tools/data-downloads#downloads>

^{viii} Circuit Court of the State of Oregon for the County of Multnomah, “Sara Moore v. Sundt Construction, Inc., et al, Case No. 16CV05886, “Complaint,” Filed 02/25/2016

^{ix} Superior Court of California, County of Yuba, Joanne Turner vs. Sundt Construction, Inc., Case Number: YCSC CV PO 12-556, 06/11/2012

^x Superior Court of California, County of Sacramento, Adan vs. The Sundt Companies Inc, Case No: 34-2013-00144720-CU-PO-GDS, Case Init. Date: 05/06/2013

^{xi} Superior Court of California, County of Alameda, Sigman vs. Sundt Construction, Inc., Case Number: RG11558048, Date Filed: 01/26/2011