

DEPARTMENT OF INDUSTRIAL RELATIONS
Division of Labor Standards Enforcement
Legal Section
455 Golden Gate Avenue, Room 3168
San Francisco, CA 94102



November 1, 1991

Frank S. Hiscox, Senior Counsel
L.A. Gear
4221 Redwood Avenue
Los Angeles, CA 90066-5619

Re: **Garment Manufacturer Status**
Reg. No. 0019887
Expires: May 14, 1992

Dear Mr. Hiscox:

This is in response to your letter of October 23, 1991, asking whether your firm is required to be licensed as a garment manufacturer in California.

As you describe the situation, you state that "[s]ome of the apparel is imported as blank garments which are then printed, stitched, or otherwise finished and packaged by third parties to L.A. Gear's order. And some of the apparel is manufactured and packaged in the United States¹ to L.A. Gear's order..."

"Garment Manufacturing" is defined at Labor Code §2671(b) and includes:

"sewing, cutting, making, processing, repairing, finishing, assembling, or otherwise preparing any garment...or any persons contracting to have the above operations performed."

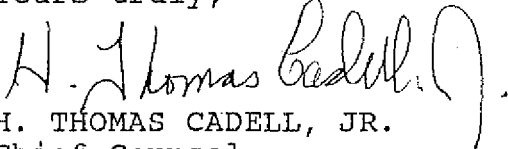
Labor Code §2670 indicates that this legislation is designed as a use of the state's police power to correct certain abuses in the garment industry. Remedial legislation, of course, must be broadly construed in order to effectuate the designed remedy. With that construction in mind, I would have to conclude that your firm must be registered as a garment manufacturer if they intend to continue their present practices.

I hope this adequately addresses the issue you raise in your letter of October 23rd. I am sure that our Licensing Section will be able to give you any further information you may require.

¹ We have no way of ascertaining where the work is performed in the United States. Obviously, if none of the work which is performed to L.A. Gear's order in the United States is done in California, California would have no jurisdiction over these processes.

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Yours truly,


H. THOMAS CADELL, JR.
Chief Counsel

c.c. Lynne Staley