

## PUBLIC EMPLOYMENT RELATIONS BOARD



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February 3, 2010

Peter Saltzman, Attorney  
Leonard Carder  
1330 Broadway, Suite 1450  
Oakland, CA 94612-2513

Vickie L. Dawes, Deputy County Counsel  
County of Contra Costa  
651 Pine Street, 9th Floor  
Martinez, CA 94553-2514

Re: *International Federation of Professional & Technical Employees, Local 21 v. County of Contra Costa*  
Unfair Practice Charge No. SF-CE-710-M

Dear Parties:

The Office of the General Counsel has issued the enclosed COMPLAINT in the above-entitled matter. The Respondent is required to file an ANSWER within twenty (20) calendar days from the date of service of the COMPLAINT, pursuant to PERB Regulation 32644.<sup>1</sup> The required contents of the ANSWER are described in PERB Regulation 32644(b). If you have not filed a Notice of Appearance form, one should be completed and returned with your ANSWER.

An informal settlement conference will be scheduled shortly. Please direct all inquiries, filings and correspondence to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Laura Davis" followed by a stylized flourish.

Laura Davis  
Regional Attorney

cc: Ted Cwiek

Enclosure

<sup>1</sup> PERB Regulations are codified at California Code of Regulations, title 8, section 31001 et seq.

STATE OF CALIFORNIA  
PUBLIC EMPLOYMENT RELATIONS BOARD



INTERNATIONAL FEDERATION OF  
PROFESSIONAL & TECHNICAL EMPLOYEES,  
LOCAL 21,

Charging Party,

v.

COUNTY OF CONTRA COSTA,

Respondent.

Case No. SF-CE-710-M

COMPLAINT

It having been charged by Charging Party that Respondent engaged in unfair practices in violation of California Government Code section 3500 et seq., the General Counsel of the Public Employment Relations Board (PERB), pursuant to California Government Code sections 3509(b) and 3541.3(i) and California Code of Regulations, title 8, section 32640, issues this COMPLAINT on behalf of PERB and ALLEGES:

1. Charging Party is an exclusive representative within the meaning of PERB Regulation 32016(b) of appropriate units of "Supervisory" and "Non-Supervisory" employees, including public employees within the meaning of Government Code section 3501(d) and within PERB's jurisdiction.
2. Respondent is a public agency within the meaning of Government Code section 3501(c) and PERB Regulation 32016(a).
3. During the period from in or about December 2008 through June 2009, employees in the "Supervisory" and "Non-Supervisory" bargaining units exercised rights guaranteed by the Meyers-Milias-Brown Act by seeking representation by Charging Party.

4. On or about July 20, 2009, Respondent refused to extend the same health and dental benefits to employees in the "Supervisory" and "Non-Supervisory" bargaining units as were provided to unrepresented employees.

5. Respondent took the actions described in paragraph 4 because of the employees' activities described in paragraph 3, and thus violated Government Code section 3506 and committed an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(a).

6. By the acts and conduct described in paragraph 4, Respondent interfered with employee rights guaranteed by the Meyers-Milias-Brown Act in violation of Government Code section 3506 and committed an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(a).

7. This conduct also denied Charging Party its right to represent employees in violation of Government Code section 3503 and is an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(b).

Any amendment to the complaint shall be processed pursuant to California Code of Regulations, title 8, sections 32647 and 32648.

DATED: February 3, 2010

TAMI R. BOGERT  
General Counsel

By



Les Chisholm  
Division Chief