



PERB
California Public Employment
Relations Board

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December 20, 2021

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111 North Hill Street, Suite 536
Los Angeles, CA 90012

Juli Zorn, Director of Human Resources
Superior Court of California County of San Luis Obispo
999 Monterey Street, Suite 375
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Re: *California Federation of Interpreters, Local 39000 TNG-CWA v. Region 1 Court
Interpreter Employment Relations Committee*
Unfair Practice Charge No. LA-CE-42-I
COMPLAINT

Unfair Practice Charge No. LA-CE-42-I

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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 32644.¹ 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**. Please be aware that once legal counsel is designated, PERB will only correspond with that individual(s).

An informal settlement conference will be scheduled shortly. Please direct all inquiries, filings and correspondence to the undersigned. Designated legal counsel who do not attend the Informal Conference for any reason, must designate in writing consent that the meeting go forward in their absence, including, but not limited to the execution of a settlement agreement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Diana Suarez', with a stylized flourish at the end.

Diana Suarez
Regional Attorney

DSS

Enclosure

¹ PERB's Regulations are codified at California Code of Regulations, title 8, section 31001 et seq. The text of PERB's Regulations may be found at www.perb.ca.gov.

CALIFORNIA FEDERATION OF
INTERPRETERS, LOCAL 39000 TNG-CWA,

Charging Party,

v.

REGION 1 COURT INTERPRETER
EMPLOYMENT RELATIONS COMMITTEE,

Respondent.

Case No. LA-CE-42-I

COMPLAINT

It having been charged by Charging Party that Respondent engaged in unfair practices in violation of Government Code section 71800 et seq., the General Counsel of the Public Employment Relations Board (PERB), pursuant to Government Code sections 3541.3(i) and 71825(c) 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 32035(c) of an appropriate unit of employees.
2. Respondent is a regional committee within the meaning of Government Code sections 71801(h) and 71807 and PERB Regulation 32035(a).
3. Charging Party and Respondent are parties to a memorandum of understanding (MOU) that was effective from August 7, 2018, to August 6, 2021.
4. Article 7 of the MOU gives either party the right to demand to negotiate a successor MOU during the period of 90 to 120 days before the expiration of the MOU:

“In the event either party hereto desires to negotiate a successor Memorandum of Understanding, such party shall serve upon the other its written request to commence negotiations for such successor Memorandum of Understanding during the period of ninety to one-hundred twenty days prior to the termination date of this Memorandum of Understanding.”

5. On or about April 29, 2021, within the period of 90 to 120 days before the expiration of the MOU on August 6, 2021, Charging Party timely served a demand to negotiate a successor MOU on Respondent's Chairpersons: Ambreen Zaheen-Watson of Los Angeles County Superior Court, Stephanie Robbins of Santa Barbara County Superior Court, and Juli Zorn of San Luis Obispo County Superior Court.

6. On or about April 29, 2021, Zaheen-Watson asserted that Charging Party and Respondent had extended the term of their MOU until August 6, 2022, citing a March 22, 2020, side letter agreement between Charging Party and the Los Angeles County Superior Court.

7. On or about May 6, 2021, Zaheen-Watson reasserted that the parties had extended the term of their MOU until August 6, 2022, effectively refusing to bargain a successor MOU.

8. By the acts and conduct described in paragraphs 6 and 7, Respondent failed and refused to bargain in good faith with Charging Party in violation of Government Code section 71818 and committed an unfair practice under Government Code section 71825(c) and PERB Regulation 32608(c).

9. The conduct described in paragraphs 6 and 7 also interfered with the rights of bargaining unit employees to be represented by Charging Party in violation of Government Code section 71822 and is an unfair practice under Government Code section 71825(c) and PERB Regulation 32608(a).

10. The conduct described in paragraphs 6 and 7 also denied Charging Party its right to represent bargaining unit employees in violation of Government Code section

71815 and is an unfair practice under Government Code section 71825(c) and PERB Regulation 32608(b).

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

DATED: December 20, 2021

J. Felix De La Torre
General Counsel

By  _____
Brian Beyersdorf

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within entitled cause. The name and address of my residence or business is Public Employment Relations Board, Los Angeles Regional Office, 425 W. Broadway, Suite 400, Glendale, CA, 91204-1269.

On December 20, 2021, I served the Complaint and Cover Letter regarding Case No. LA-CE-42-I on the parties listed below by

X Electronic service (e-mail).

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on December 20, 2021, at Glendale, California.

Nikoo Seirafi

(Type or print name)



(Signature)