



PERB
California Public Employment
Relations Board

Los Angeles Regional Office
425 W. Broadway, Suite 400
Glendale, CA, 91204-1269
Telephone: (818) 696-6350
Gabriel.Orea@perb.ca.gov



September 30, 2025

Julia Harumi Mass, Attorney
Rothner, Segall & Greenstone
510 South Marengo Avenue
Pasadena, CA 91101-3115

Leslie Ruiz, Attorney
Sloan Sakai Young & Wong LLP
2200 Powell Street, Suite 450
Emeryville, CA 94608

Timothy Yeung, Attorney
Sloan Sakai Yeung & Wong LLP
555 Capitol Mall, Suite 600
Sacramento, CA 95814

Re: *California Faculty Association v. Trustees of the California State University*
Unfair Practice Charge No. SA-CE-438-H
COMPLAINT

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

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.

Unfair Practice Charge No. SA-CE-438-H

September 30, 2025

Page 2

consent that the meeting go forward in their absence, including, but not limited to the execution of a settlement agreement.

Sincerely,

/s/ Gabriel Orea

Gabriel Orea
Regional Attorney

GO

Enclosure

STATE OF CALIFORNIA

PUBLIC EMPLOYMENT RELATIONS BOARD



CALIFORNIA FACULTY ASSOCIATION,

Charging Party,

v.

TRUSTEES OF THE CALIFORNIA STATE
UNIVERSITY,

Respondent.

Case No. SA-CE-438-H

COMPLAINT

It having been charged by Charging Party that Respondent engaged in unfair practices in violation of Government Code section 3571, the General Counsel of the Public Employment Relations Board (PERB), pursuant to Government Code sections 3563(h) and 3563.2 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 Government Code section 3562(i) of an appropriate unit of employees.
2. Respondent is an employer within the meaning of Government Code section 3562(g).
3. On October 31, 2024, Charging Party notified Respondent that it intended to meet and confer, pursuant to Government Code 3570, over all articles in the parties' collective bargaining agreement.

Surface Bargaining

4. While the parties were meeting and conferring, Respondent engaged in a course of conduct, including but not limited to the following: (i) on or about March 28, 2025, and April 4, 2025, refusing to negotiate face-to-face with Charging Party due to due to Charging Party's inclusion of faculty members and/or "observers" on Zoom; and

(ii) failing to respond to Charging Party's April 4, 2025, proposal regarding ground rules.

5. Under the totality of circumstances, including but not limited to the specific acts described in paragraph 4, Respondent failed and refused to meet and confer in good faith in violation of Government Code section 3571(c).

6. This conduct interfered with the rights of bargaining unit employees to be represented by Charging Party in violation of Government Code section 3571(a).

Failure to Provide Requested Information

7. Charging Party requested information that is relevant and necessary to its discharge of its duty to represent employees, as follows:

- i. On or about December 2, 2024, Charging Party requested the total number of Management Personnel Program employee job searches, by campus, for Academic Years 2022-23, 2023-24, and 2024-25; the total number of proposed or anticipated administrative or Management Personnel Program employee job searches, by campus, for Academic Years 2025-26 and 2026-27; and information about Bargaining Unit 3 employees placed on paid suspension pending investigations for Academic Years 2021-22, 2022-23, 2023-24, and to date in Academic Year 2024-25.
- ii. On or about February 18, 2025, Charging Party requested information about fee waiver usage by Bargaining Unit 3 members in Academic Years 2022-23, 2023-24, and 2024-25, along with the approximate cost and value associated with the fee waivers.
- iii. On or about February 24, 2025, Charging Party requested

unfiltered or unprocessed data on all police incidents on all campuses and copies of all contracts for outsourcing to private security services.

- iv. On or about March 28, 2025, Charging Party requested to share any example or instance of ground rules used for CFA or any other bargaining unit in the CSU.

8. Respondent has failed to provide the information requested in paragraph 7.

9. By the conduct described in paragraph 8, Respondent failed and refused to meet and confer in good faith with Charging Party in violation of Government Code section 3571(c).

10. This conduct also interfered with the rights of bargaining unit employees to be represented by Charging Party in violation of Government Code section 3571(a).

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

DATED: September 30, 2025

J. Felix De La Torre
General Counsel

By /s/ James Coffey
James Coffey
Principal Attorney Supervisor

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Sacramento, 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, Sacramento Regional Office, 1031 18th Street, Sacramento, CA, 95811-4124.

On September 30, 2025, I served the Complaint and Cover Letter regarding Case No. SA-CE-438-H on the parties listed below by

 I am personally and readily familiar with the business practice of the Public Employment Relations Board for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Sacramento, California.

 Personal delivery.

 X Electronic service (e-mail).

Julia Harumi Mass, Attorney
Rothner, Segall & Greenstone
510 South Marengo Avenue
Pasadena, CA 91101-3115
Email: jmass@rsglabor.com

Leslie Ruiz, Attorney
Sloan Sakai Young & Wong LLP
2200 Powell Street, Suite 450
Emeryville, CA 94608
Email: lruiz@sloansakai.com

Timothy Yeung, Attorney
Sloan Sakai Yeung & Wong LLP
555 Capitol Mall, Suite 600
Sacramento, CA 95814
Email: tyeung@sloansakai.com

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 30, 2025, at Sacramento, California.

Arianna Tizoc-Perez

(Type or print name)

/s/ Arianna Tizoc-Perez

(Signature)