



PERB
California Public Employment
Relations Board

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August 22, 2025

Timothy Yeung, Attorney
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510 South Marengo Avenue
Pasadena, CA 91101

Julia Harumi Mass, Attorney
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510 South Marengo Avenue
Pasadena, CA 91101-3115

Re: *Trustees of the California State University v. California Faculty Association*
Unfair Practice Charge No. LA-CO-564-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.

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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

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Enclosure

STATE OF CALIFORNIA
PUBLIC EMPLOYMENT RELATIONS BOARD



TRUSTEES OF THE CALIFORNIA STATE
UNIVERSITY,

Charging Party,

v.

CALIFORNIA FACULTY ASSOCIATION,

Respondent.

Case No. LA-CO-564-H

COMPLAINT

It having been charged by Charging Party that Respondent engaged in unfair practices in violation of Government Code section 3571.1, 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 employer within the meaning of Government Code section 3562(g).
2. Respondent is an exclusive representative within the meaning of Government Code section 3562(i) of an appropriate unit of employees. Respondent represents a unit of faculty members working for Charging Party.
3. From approximately October 2024 to at least approximately April 2025, Respondent and Charging Party were meeting and conferring pursuant to Government Code section 3570.
4. Before approximately March 2025, the status quo concerning the parties' ground rules for collective bargaining negotiations was that employee observers were not permitted to attend negotiations.

5. On or about March 29, 2025, Respondent changed this policy by bringing employee observers to a bargaining session with Charging Party.

6. Respondent engaged in the conduct described in paragraph 5 without prior notice to Charging Party and without having afforded Charging Party an opportunity to meet and confer over the decision to change the status quo and/or the effects of its decision to do so.

7. By the acts and conduct described in paragraphs 5 and 6, Respondent failed and refused to meet and confer in good faith in violation of Government Code section 3571.1(c).

8. In addition, under the totality of circumstances, including but not limited to the specific acts described in paragraph 5, Respondent failed and refused to bargain in good faith with Charging Party in violation of Government Code section 3571.1(c).

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

DATED: August 20, 2025

J. Felix De La Torre
General Counsel

By /s/ Jeremy Zeitlin
Jeremy Zeitlin
Senior Regional Attorney

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 August 22, 2025, I served the Complaint and Cover Letter regarding Case No. LA-CO-564-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).

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 22, 2025, at Sacramento, California.

Arianna Tizoc-Perez

(Type or print name)

/s/ Arianna Tizoc-Perez

(Signature)