



PERB Received
10/09/26 14:50 PM

STATE OF CALIFORNIA

PUBLIC EMPLOYMENT RELATIONS BOARD

UNFAIR PRACTICE CHARGE

DO NOT WRITE IN THIS SPACE: Case No:

Date Filed: 10/09/2026

INSTRUCTIONS: File the original and one copy of this charge form in the appropriate PERB regional office (see PERB Regulation 32075), with proof of service attached to each copy. Proper filing includes concurrent service and proof of service of the charge as required by PERB Regulation 32615(c). All forms are available from the regional offices or PERB's website at www.perb.ca.gov. If more space is needed for any item on this form, attach additional sheets and number items.

IS THIS AN AMENDED CHARGE?

YES ☐

If so, Case No

NO ☒

1. CHARGING PARTY: EMPLOYEE ☐ EMPLOYEE ORGANIZATION ☒ EMPLOYER ☐ PUBLIC¹ ☐

- a. Full name: California Faculty Association
- b. Mailing Address: 1110 K Street, Sacramento, CA 95814
- c. Telephone number: (626) 796-7555
- d. Name and title of agent to contact: California Faculty Association E-mail Address: jnarahara@rsglabor.com
Telephone number: (626) 796-7555 Fax No.:
- e. Bargaining Unit(s) involved: Unit 3

2. CHARGE FILED AGAINST: (mark one only) EMPLOYEE ORGANIZATION ☐ EMPLOYER ☒

- a. Full name: Trustees of the California State University
- b. Mailing Address: 401 Golden Shore Long Beach, CA 90802
- c. Telephone number: (562) 951-4500
- d. Name and title of agent to contact: Marc Mootchnik, University Counsel E-mail Address: mmootchnik@calstate.edu
Telephone number: (562) 951-4500 Fax No.:

3. NAME OF EMPLOYER (Complete this section only if the charge is filed against an employee organization.)

- a. Full name:
- b. Mailing address:

4. APPOINTING POWER: (Complete this section only if the employer is the State of California. See Gov. Code, § 18524.)

- a. Full name:
- b. Mailing Address:
- c. Agent:

5. GRIEVANCE PROCEDURE

¹An affected member of the public may only file a charge relating to an alleged public notice violation, pursuant to Government Code section 3523, 3547, 3547.5, or 3595, or Public Utilities Code section 99569

PERB Received
10/09/26 14:50 PM

Are the parties covered by an agreement containing a grievance procedure which ends in binding arbitration?

Yes ☒ No ☐ Unknown ☐

6. STATEMENT OF CHARGE

a. The charging party hereby alleges that the above-named respondent is under the jurisdiction of: (check one)

- ☐ Educational Employment Relations Act (EERA) (Gov. Code, § 3540 et seq.)
- ☐ Ralph C. Dills Act (Gov. Code, § 3512 et seq.)
- ☒ Higher Education Employer-Employee Relations Act (HEERA) (Gov. Code, § 3560 et seq.)
- ☐ Meyers-Milias-Brown Act (MMBA) (Gov. Code, § 3500 et seq.)
- ☐ Los Angeles County Metropolitan Transportation Authority Transit Employer-Employee Relations Act (TEERA) (Pub. Utilities Code, § 99560 et seq.)
- ☐ One of the following Public Utilities Code Transit District Acts: San Francisco Bay Area Rapid Transit District Act (SFBART Act) (Pub. Util. Code, § 28848 et seq.), Orange County Transit District Act (OCTDA) (Pub. Util. Code, § 40000 et seq.), Sacramento Regional Transit District Act (Sac RTD Act) (Pub. Util. Code, § 102398 et seq.), Santa Clara VTA, (Pub. Util. Code, § 100300 et seq.), and Santa Cruz Metro (Pub. Util. Code, § 98160 et seq.)
- ☐ Trial Court Employment Protection and Governance Act (Trial Court Act) (Article 3; Gov. Code, § 71630 – 71639.5)
- ☐ Trial Court Interpreter Employment and Labor Relations Act (Court Interpreter Act) (Gov. Code, § 71800 et seq.)

b. The specific Government or Public Utilities Code section(s) or PERB regulation section(s) alleged to have been violated is/are:
Government Code sections 3550 and 3571; PERB Regulation 32611(a) and (d)

c. For MMBA, Trial Court Act and Court Interpreter Act cases, if applicable, the specific local rule(s) alleged to have been violated is/are (***a copy of the applicable local rule(s) MUST be attached to the charge:***)

d. Provide a clear and concise statement of the conduct alleged to constitute an unfair practice including, where known, the time and place of each instance of respondent's conduct, and the name and capacity of each person involved. This must be a statement of the facts that support your claim and *not conclusions of law*. A statement of the remedy sought must also be provided. (*Use and attach additional sheets of paper if necessary.*)

See attached.

AI ADVISORY

You are accountable for all content in the above filing, including any content created by or assisted by generative artificial intelligence ("AI") or other technological tools. Before filing your document, you must: (1) confirm the existence of all cited authorities, (2) ensure no cited authority is fabricated, misstated, or misleadingly taken out of context, and (3) verify that all information included in the filing, including any information generated or assisted by AI or other technological tools, is accurate. Be advised that including fabricated information in your filing risks serious consequences, including but not limited to striking the filing from the record, dismissing the charge, issuing monetary sanctions, and, if you are an attorney, reporting to the State Bar.

DECLARATION

I declare under penalty of perjury that I have read the above charge and that the statements herein are true and complete to the best of my knowledge and belief. (A Declaration will be included in the e-mail you receive from PERB once you have completed this screen. The person filing this Unfair Practice Charge is required to return a properly filled out and signed original Declaration to PERB pursuant to PERB Regulations 32140 and 32135.)

Jenna Narahara
(Type or Print Name)

/s/ Jenna Narahara
(Signature)

10/09/2026
Date



PERB Received
10/09/26 14:49 PM

STATE OF CALIFORNIA
PUBLIC EMPLOYMENT RELATIONS BOARD
UNFAIR PRACTICE CHARGE

DO NOT WRITE IN THIS SPACE:

Case No:

Date Filed:

INSTRUCTIONS: File this charge form via the e-PERB Portal, with proof of service. Parties exempt from using the e-PERB Portal may file the original charge in the appropriate PERB regional office (see PERB Regulation 32075), with proof of service attached. Proper filing includes concurrent service and proof of service of the charge as required by PERB Regulation 32615(c). All forms are available from the regional offices or PERB's website at www.perb.ca.gov. If more space is needed for any item on this form, attach additional sheets and number items.

IS THIS AN AMENDED CHARGE?

YES

☐

If so, Case No.

NO

☒

1. CHARGING PARTY:

EMPLOYEE

☐

EMPLOYEE ORGANIZATION

☒

EMPLOYER

☐

PUBLIC¹

☐

a. Full name:

California Faculty Association

b. Mailing address:

1110 K Street, Sacramento, CA 95814

c. Telephone number:

(916) 441-4848

d. Name and title of
person filing charge:

Jenna Narahara, Attorney

E-mail Address:

jnarahara@rsglabor.com

Telephone number: (626) 796-7555

e. Bargaining unit(s)
involved:

Unit 3

2. CHARGE FILED AGAINST: (mark one only)

EMPLOYEE ORGANIZATION

☐

EMPLOYER

☒

a. Full name:

Trustees of the California State University

b. Mailing address:

401 Golden Shore, Long Beach, CA 90802

c. Telephone number:

(562) 951-4500

d. Name and title of
agent to contact:

Marc Mootchnik, University Counsel

E-mail Address:

mmootchnik@calstate.edu

Telephone number: (562) 951-4500

3. NAME OF EMPLOYER (Complete this section only if the charge is filed against an employee organization.)

a. Full name:

b. Mailing address:

4. APPOINTING POWER: (Complete this section only if the employer is the State of California. See Gov. Code, § 18524.)

a. Full name:

b. Mailing address:

c. Agent:

¹ An affected member of the public may only file a charge relating to an alleged public notice violation, pursuant to Government Code section 3523, 3547, 3547.5, or 3595, or Public Utilities Code section 99569.

5. GRIEVANCE PROCEDURE

PERB Received
10/09/26 14:49 PM

Are the parties covered by an agreement containing a grievance procedure which ends in binding arbitration?

Yes ☒ No ☐ Unknown ☐

6. STATEMENT OF CHARGE

- a. The charging party hereby alleges that the above-named respondent is under the jurisdiction of: (check one)
- ☐ Educational Employment Relations Act (EERA) (Gov. Code, § 3540 et seq.)
- ☐ Ralph C. Dills Act (Gov. Code, § 3512 et seq.)
- ☒ Higher Education Employer-Employee Relations Act (HEERA) (Gov. Code, § 3560 et seq.)
- ☐ Meyers-Milias-Brown Act (MMBA) (Gov. Code, § 3500 et seq.)
- ☐ One of the following Public Utilities Code Transit District Acts: San Francisco Bay Area Rapid Transit District Act (SFBART Act) (Pub. Util. Code, § 28848 et seq.), Orange County Transit District Act (OCTDA) (Pub. Util. Code, § 40000 et seq.), Sacramento Regional Transit District Act (Sac RTD Act) (Pub. Util. Code, § 102398 et seq.), Santa Clara VTA, (Pub. Util. Code, § 100300 et seq.), and Santa Cruz Metro (Pub. Util. Code, § 98160 et seq.)
- ☐ The Los Angeles County Metropolitan Transportation Authority Transit Employer-Employee Relations Act (TEERA) (Supervisory Employees of the Los Angeles County Metropolitan Authority (Pub. Util. Code, § 99560 et seq.)
- ☐ Trial Court Employment Protection and Governance Act (Trial Court Act) (Article 3; Gov. Code, § 71630 – 71639.5)
- ☐ Trial Court Interpreter Employment and Labor Relations Act (Court Interpreter Act) (Gov. Code, § 71800 et seq.)
- b. The specific Government or Public Utilities Code section(s), or PERB regulation section(s) alleged to have been violated is/are: Government Code sections 3550 and 3571 and PERB Regulation sections 32611(a) Unknown ☐ and (d)
- c. For MMBA, Trial Court Act and Court Interpreter Act cases, if applicable, the specific local rule(s) alleged to have been violated is/are **(a copy of the applicable local rule(s) MUST be attached to the charge)**:
- d. Provide a clear and concise statement of the conduct alleged to constitute an unfair practice including, where known, the time and place of each instance of respondent's conduct, and the name and capacity of each person involved. This must be a statement of the facts that support your claim and *not conclusions of law*. A statement of the remedy sought must also be provided. *(Use and attach additional sheets of paper if necessary.)* See attached ☒

ADVISORY ALERT

You are accountable for all content in the above filing, including any content created by or assisted by generative artificial intelligence ("AI") or other technological tools. Before filing your document, you must: (1) confirm the existence of all cited authorities, (2) ensure no cited authority is fabricated, misstated, or misleadingly taken out of context, and (3) verify that all information included in the filing, including any information generated or assisted by AI or other technological tools, is accurate. Be advised that including fabricated information in your filing risks serious consequences, including but not limited to striking the filing from the record, dismissing the charge, issuing monetary sanctions, and, if you are an attorney, reporting to the State Bar.

DECLARATION

I declare under penalty of perjury that I have read the above charge and that the statements herein are true and complete to the best of my knowledge and belief.

Jenna Narahara

(Type or Print Name)

/s/ Jenna Narahara

(Signature)

10/09/2026

(Date)

STATEMENT OF CHARGE

California Faculty Association v. California State University

1. Respondent California State University (“CSU”) is an employer within the meaning of Government Code § 3562(g).

2. Charging Party California Faculty Association (“CFA”) is the “exclusive representative” within the meaning of Government Code § 3562(i) of a bargaining unit of approximately 29,000 faculty employees employed by CSU at its 23 campuses. The CFA-represented CSU employees include Lecturers, Assistant Professors, Associate Professors, Full Professors, Coaches, Counselors, and Librarians who are part of bargaining unit 3 (“Unit 3”).

3. At all relevant times, CFA and CSU have been parties to a collective bargaining agreement (“CBA”) covering the terms and conditions of employment for employees in Unit 3. The CBA includes a grievance process that ends in binding arbitration.

4. On August 7, 2026, CSU, through Interim Vice Chancellor and Chief Human Resources Officer Dave Grant, sent an e-mail to all CSU employees sharing its findings of its independent market study of compensation for instructional faculty and staff systemwide. In its email, CSU announced that it had conducted “a comprehensive, independent market study of compensation for represented instructional faculty and staff systemwide,” that the study showed compensation “is competitive with comparable employers and peer institutions” and that the study “found that the CSU’s health, dental, and retirement benefits are often more generous than those offered by comparable employers.” The email also stated, “At the same time, we recognize that systemwide findings do not reflect every employee’s experience and that there are areas where base pay warrants further review. We are committed to identifying those areas and continuing to improve how we support, recruit, and retain our employees. We will take the time to carefully review and understand the findings so they can inform next steps and future proposals related to employee compensation.” A true and correct copy of this correspondence is attached hereto as Exhibit A.

5. CSU’s August 7, 2026, email states that CSU is taking affirmative responsibility for ensuring that represented employees receive fair compensation and implies that CFA and other exclusive representatives of CSU’s employees have less knowledge, expertise, commitment, and/or capacity to ensure fair compensation for the employees they represent than CSU has.

6. By the above-described conduct, CSU deterred or discouraged employees from becoming or remaining members of an employee organization and interfered with employees’ right to join an employee organization and participate in protected activity. Accordingly, CSU

violated Government Code sections 3550 and 3571 and committed an unfair practice under PERB Regulation 32611(a) and (d).

7. As a remedy, CFA seeks an order requiring CSU to: (1) cease and desist from the above-described unlawful conduct; (2) post a notice in conspicuous places concerning its violations of the Government Code; (3) e-mail a notice to employees concerning its violations of the Government Code; and (4) provide such other relief deemed just and proper.

EXHIBIT “A”

From: SystemwideHR SystemwideHR@calstate.edu
Subject: CSU Employee Compensation Market Study
Date: August 7, 2026 at 12:44 PM
To: All CSU Employees all-csu-employees@lists.calstate.edu

Dear CSU Colleagues,

Last year, the California State University committed to conducting a comprehensive, independent market study of compensation for represented instructional faculty and staff systemwide. We also pledged to finish that work by the end of July, and I'm pleased to share that the study is now complete.

The study shows that the investments the CSU has made in its employees over the past several years are making a meaningful difference. Overall, compensation for represented staff and instructional faculty – including salary and benefits – is competitive with comparable employers and peer institutions. Staff compensation has improved by approximately six percentage points since the 2022 study, while instructional faculty have maintained the competitive position identified in 2023. The study also found that the CSU's health, dental and retirement benefits are often more generous than those offered by comparable employers.

At the same time, we recognize that systemwide findings do not reflect every employee's experience and that there are areas where base pay warrants further review. We are committed to identifying those areas and continuing to improve how we support, recruit and retain our employees. We will take the time to carefully review and understand the findings so they can inform next steps and future proposals related to employee compensation.

The study findings, along with FAQ and background information, can be found at the [Employee Compensation Market Study](#) page.

This work matters because the CSU's strength comes from its people. We remain committed to supporting our employees through fair compensation and competitive benefits, informed by accurate, up-to-date peer benchmarking and grounded in transparency and open communication.

Thank you for all you do for our students, our universities and the CSU.

Dave

Dave A. Grant, DBA
Interim Vice Chancellor and Chief Human Resources Officer
Main: 562-951-4070
401 Golden Shore, Long Beach CA 90802
www.calstate.edu | [Systemwide HR Strategic Plan](#)

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Los Angeles,
State of California. I am over the age of 18 years. The name and address of my

Residence or business is Rothner, Segall & Greenstone
510 South Marengo Avenue, Pasadena, California 91101-3115.

On 10/09/2026, I served the UNFAIR PRACTICE CHARGE
(Date) (Description of document(s))

_____ in Case No. _____
(Description of document(s) continued) (PERB Case No., if known)

on the parties listed below by (check the applicable method(s)):



placing a true copy thereof enclosed in a sealed envelope for collection and delivery by
the United States Postal Service or private delivery service following ordinary business
practices with postage or other costs prepaid;



personal delivery.

(Include here the name, title (if any), and address of the Respondent and/or any other parties served.)

Marc Mootchnik, University Counsel
Trustees of the California State University
401 Golden Shore
Long Beach, CA 90802
562-951-4500
mmootchnik@calstate.edu

I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct and that this declaration was executed on 10/09/2026, at
(date)

Pasadena CA
(City) (State)

Donna Martin

/s/ Donna Martin

(Type or print name)

(Signature)