

SUPPORTING FACTUAL ALLEGATIONS
(Attachment to Unfair Practice Charge dated August 3, 2011)

1. The Coalition of Compton Unions ("Coalition") consists of the following employee organizations, each an exclusive representative of a unit of employees of the City of Compton ("City"):

- a. American Federation of State, County and Municipal Employees, Local 2325, AFL-CIO;
- b. American Federation of State, County and Municipal Employees, Local 3947, AFL-CIO;
- c. Service Employees International Union, Local 721; and
- d. Compton Firefighters, IAFF, Local 2216.

The present charge is filed on behalf of the Coalition and each of its participating employee organizations, collectively referred to herein as the "Coalition unions."

2. Each of the Coalition unions is a recognized employee organization within the meaning of § 3501(b) of the Meyers-Milias-Brown Act ("MMBA"), Government Code §§ 3500-11. The City is a public agency within the meaning of § 3501(c) of the MMBA. Pursuant to MMBA § 3505, the City has an obligation to meet and confer with the Coalition unions about matters within the scope of representation, as defined by MMBA § 3501(c).

3. In or about June 2011, the City announced that, as the result of a budget deficit for fiscal year 2011-12, the City was contemplating layoffs in each of the bargaining units represented by the Coalition Unions.

4. Commencing on or about June 6, 2011, the Coalitions unions demanded to bargain about the effects of the proposed layoff of City employees. In connection with its bargaining demand, the Coalition unions also made written requests to the City for information necessary and relevant to the matters within the scope of representation.

5. Commencing in or about June 2011 and continuing to the present, the City has violated its obligations to meet and confer with the Coalition unions in the following respects:

- a. The City has failed and refused to meet and confer about the effects of the proposed layoffs, and has announced its intention to implement the layoffs without complying with its bargaining obligations.

- b. In the course of implementing the layoffs and adopting its budget for the 2011-12 Fiscal Year, the City has unilaterally adopted certain cost-savings measures proposed by the Coalitions unions as a means of avoiding the need for layoffs. The City's adoption of these measures represents an unlawful unilateral changes in the terms and conditions of employment of employees represented by the Coalition unions.
- c. The City has failed and refused to provide to the Coalition information necessary and relevant to bargaining over the impact of the proposed layoffs.
- d. In selecting employees for layoff, the City has disregarded its own layoff rules and targeted employees for layoff in retaliation for their protected, concerted activities.

6. The conduct described above constitutes a violation of the City's obligation to meet and confer under MMBA § 3505 and prohibited discrimination in violation of MMBA § 3506.

7. As a remedy for the foregoing violations, the Coalition unions seeks an order requiring that the City:

- a. Cease and desist from failing and refusing to meet and confer about the effects of the proposed layoffs;
- b. Cease and desist from implementing unilateral changes in the terms and conditions of employment of employees represented by the Coalition unions;
- c. Restore the pre-violation status quo by rescinding all layoffs and unlawful unilateral changes until the City has fully complied with its meet and confer obligations;
- d. Make all employees whole for the City's unlawful actions;
- e. Provide the Coalition unions with all requested information necessary and relevant to their representational obligations; and
- F. Take any further remedial action that the Board deems appropriate.