



PERB Received
10/09/26 16:16 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: Service Employees International Union, Local 1000
b. Mailing Address: 1808 14th Street, Sacramento, CA 95811
c. Telephone number: [REDACTED]
d. Name and title of agent to contact: [REDACTED] E-mail Address: [REDACTED]
Telephone number: [REDACTED] Fax No.: [REDACTED]
e. Bargaining Unit(s) involved:

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

a. Full name: State of California
b. Mailing Address: 1515 S Street, North Building, Suite 500 Sacramento, CA 95811
c. Telephone number: [REDACTED]
d. Name and title of agent to contact: [REDACTED] E-mail Address: [REDACTED]
Telephone number: [REDACTED] Fax No.: [REDACTED]

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 18:16 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:
Gov. Code, § 3519 (a)-(c)

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.)

(Type or Print Name)

(Signature)

10/09/2026

Date



PERB Received
10/09/26 16:16 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: Service Employees International Union, Local 1000

b. Mailing address: 1808 14th Street, Sacramento, CA 95811

c. Telephone number: [REDACTED]

d. Name and title of person filing charge: [REDACTED]
Telephone number: [REDACTED]

E-mail Address: [REDACTED]

e. Bargaining unit(s) involved: 1, 3, 4, 11, 14, 15, 17, 20, and 21

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

a. Full name: State of California

b. Mailing address: 1515 S Street, North Building, Suite 500, Sacramento, CA 95811

c. Telephone number: [REDACTED]

d. Name and title of agent to contact: [REDACTED]
Telephone number: [REDACTED]

E-mail Address: [REDACTED]

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: California Department of Human Resources

b. Mailing address: 1515 S Street, North Building, Suite 500, Sacramento, CA 95811

c. Agent: Monica Erickson, Director

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 16:16 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: Gov. Code. § 3519 (a)-(c) Unknown ☐
- 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 ☒

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 and that this declaration was executed on 10/09/2026

at Sacramento, CA (Date)

(City and State)

(Type or Print Name and Title, if any)

(Signature)

Mailing Address: 1808 14th Street, Sacramento, CA 95811

E-Mail Address: [REDACTED]

Telephone Number: (916) 554-1279

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Sacramento,
State of California. I am over the age of 18 years. The name and address of my
Residence or business is 1808 14th Street, Sacramento, CA 95811

On 10/09/2026, I served the Unfair Practice Charge
(Date) (Description of document(s))

(Description of document(s) continued) in Case No. 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;
- ☐ electronic service - I served a copy of the above-listed document(s) by transmitting via electronic mail (e-mail) or via e-PERB to the electronic service address(es) listed below on the date indicated. *(May be used only if the party being served has filed and served a notice consenting to electronic service or has electronically filed a document with the Board. See PERB Regulation 32140(b).)*

(Include here the name, address and/or e-mail address of the Respondent and/or any other parties served.)

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 Sacramento CA (Date)
(City) (State)

(Type or print name)

(Signature)

STATEMENT OF FACTS

1. Charging Party Service Employees International Union, Local 1000 (“SEIU Local 1000” or “Union”) is the exclusive representative of State employees in Bargaining Units 1, 3, 4, 11, 14, 15, 17, 20, and 21 under the Ralph C. Dills Act.
2. Respondent State of California, through the California Department of Human Resources (“CalHR”), is the public employer and the Governor’s designated representative for purposes of collective bargaining with SEIU Local 1000.
3. SEIU Local 1000 has been engaged in a labor dispute with the State and has alleged numerous unfair practices arising from the State’s bargaining conduct. In anticipation that members might authorize an unfair practice strike, the Union began preparing months in advance to address any State claim that particular bargaining-unit employees would need to continue working to protect public health or safety.
4. Beginning no later than July 29, 2026, the Union requested information necessary to conduct meaningful line-pass and minimum-staffing negotiations. The purpose of those requests was to identify genuinely essential functions, assess reduced operations and replacement coverage, narrow disputes, and ultimately identify the individual employees who would be exempted from any strike.
5. On September 16, 2026, representatives of SEIU Local 1000, CalHR, and counsel participated in an introductory meeting concerning the line-pass process. Union counsel Kerianne Steele, Weinberg Rogers & Rosenfeld explained the anticipated process: first determine the minimum staffing numbers by department, classification, facility, and shift; then identify the particular employees who would receive line passes. The parties were specifically advised that sufficient time needed to remain after the first phase to identify and notify individual line-pass employees.
6. The Union also explained that minimum staffing could not simply replicate ordinary staffing. The process required consideration of reduced or deferred services, supervisors and managers, outside and registry personnel, other qualified replacement employees, and other operational alternatives. The Union repeatedly requested information necessary to assess those alternatives.
7. On October 1 and October 2, 2026, the parties conducted extensive line-pass negotiations involving CalHR, affected State departments, bargaining-unit representatives, subject-matter experts, counsel, and Union staff. Departments presented their proposed minimum staffing numbers, and the Union questioned those proposals concerning replacements, supervisory coverage, reduced operations, historical staffing, and other alternatives.

8. The October 1 and 2 meetings did not complete the process. During those meetings, representatives of several departments acknowledged that their minimum staffing requirements could be reduced further depending on the **timing and duration of the strike**, including whether the strike was limited to one day. The Union therefore understood that the departments would further refine their proposals once the strike duration became known.
9. The parties contemplated additional meetings. Further bargaining time was requested for October 8 and scheduled for October 9, and the Union remained available to continue through the weekend if necessary.
10. The Union continued requesting information after the October 1 and 2 sessions, including Premium Holiday and other reduced-operation staffing information by department, classification, facility, and worksite. The information was relevant to determining what staffing the State itself had previously considered sufficient during reduced operations. (10/8 email exchange with CalHR attached hereto as Exhibit 1)
11. On October 5, before the specific strike date and duration had been announced, the Union proposed a detailed schedule designed to complete the process promptly. The Union proposed meeting again immediately after the strike announcement, continuing Friday with PERB mediation, and working through the weekend if necessary. The Union also asked the departments to begin identifying the employees actually scheduled to work so the parties could proceed from staffing numbers to individual line-pass employees. (10/8 email exchange with CalHR attached hereto as Exhibit 1)
12. The Union further identified its outstanding department-by-department questions and alternatives, including supervisory and cross-class coverage, registry staffing, reduced meal service, reduced custodial functions, 12-hour nursing schedules, Premium Holiday staffing, and other means of reducing the number of bargaining-unit employees required to work during the strike. (10/8 email exchange with CalHR attached hereto as Exhibit 1)
13. CalHR nevertheless unilaterally cancelled the October 8 and October 9 meetings. CalHR stated that, once the date and duration were known, management would need time to reassess staffing, medical procedures, registry resources, and other operational constraints. (10/8 email exchange with CalHR attached hereto as Exhibit 1)
14. The Union immediately objected to cancellation of those meetings. It emphasized that time was short, substantial work remained, and the departments had already identified the relevant classifications, worksites, shifts, proposed staffing levels, and replacement resources. The Union proposed sequencing departments if necessary rather than suspending negotiations altogether.

(10/8 email exchange with CalHR attached hereto as Exhibit 1)

15. On October 6, CalHR confirmed that it had removed the meetings from the calendar and rescinded release time associated with those meetings.

(10/8 email exchange with CalHR attached hereto as Exhibit 1)

16. The Union continued attempting to restart negotiations. On October 7, Union Contract Department Director Brooke Pierman texted CalHR Principal Labor Relations Officer Brian Lin Walsh requesting that the parties resume discussions. Lin Walsh did not respond until the following morning and again stated that CalHR needed to know the strike date before resuming line-pass negotiations. Ms. Pierman promptly informed him that the strike would be a **one-day strike on October 21, 2026**, and renewed the Union's request for staffing schedules needed to identify individual line-pass employees.

17. On October 8, the Union formally notified CalHR of the one-day strike. It again urged CalHR to immediately resume and complete line-pass negotiations, offered to meet the following day and throughout the weekend, proposed use of PERB mediators, and offered to operate multiple departmental bargaining tables simultaneously if necessary. (Strike notice attached hereto as Exhibit 2)

18. During a telephone conversation that afternoon, Ms. Pierman again urged CalHR to resume immediately and offered to negotiate throughout the weekend "around the clock." She also proposed that PERB assign mediators and that the Union conduct multiple tables simultaneously. CalHR indicated that it was focused instead on preparing for impasse mediation. The Union offered to staff separate teams so that the two processes could proceed concurrently.

19. PERB itself encouraged the parties to continue line-pass negotiations and expressly advised that PERB attorneys were available Friday, throughout the weekend, and the following week to mediate the dispute, including through multiple mediators because of the number of departments and positions involved.

(10/9 email exchange with CalHR attached hereto as Exhibit 3)

20. On October 8, 2026, CalHR formally notified the Union and PERB that it intended to file a request for injunctive relief concerning the Union's October 21 one-day strike, asserting, incorrectly, that the strike was "pre-impasse" notwithstanding that PERB had already issued an impasse declaration, and claiming among other things, that the strike would pose a threat to public health and safety.

(10/9 email exchange with CalHR attached hereto as Exhibit 3)

21. At the time CalHR terminated the negotiations, the State had not provided final revised minimum-staffing proposals reflecting the now-known one-day strike duration for all departments and had not provided the employee-by-employee schedules necessary to complete the line-pass process.

22. CalHR therefore terminated the line-pass process at precisely the point when the departments had represented that the one-day duration would permit further reductions and when the parties could have moved from preliminary numbers to final reduced staffing and employee identification.
23. The Union at all times remained prepared to provide line passes for bargaining-unit employees actually necessary to avoid an imminent and substantial threat to public health or safety. The Union repeatedly offered its personnel, bargaining-unit representatives, subject-matter experts, counsel, evenings, weekend time, multiple bargaining tables, and PERB mediation to complete that process.
24. CalHR instead elected to terminate those negotiations and seek to have PERB restrict the strike based upon unresolved staffing proposals that had not undergone the further one-day-strike reductions contemplated by the parties.

STATEMENT OF LAW

1. The Ralph C. Dills Act protects employees' organizational rights and makes it unlawful for the State to interfere with or restrain employees in the exercise of protected rights, deny employee organizations rights guaranteed under the Act, or refuse or fail to meet and confer in good faith with the recognized employee organization. (Gov. Code, § 3519, subds. (a)-(c).) Section 3519(c) expressly prohibits the State from refusing or failing to meet and confer in good faith.
2. The right protected by California public-sector collective bargaining law includes the qualified right of public employees to strike, subject to the essential-employee limitation recognized in *County Sanitation District No. 2 v. Los Angeles County Employees Assn.* and subsequent PERB decisions.
3. In *County of San Mateo* (2019) PERB Order No. IR-61-M, PERB held that an employer seeking to restrict a strike on essential-employee grounds must establish its remaining need after accounting for available supervisors and managers, other nonstriking employees, outside replacement sources, service reductions, and other coverage alternatives. In short-duration strikes, PERB also considers holiday and weekend staffing and the employer's ability to shift work before or after the strike.
4. PERB further recognizes that where the union exempts positions preliminarily found essential, such exemptions ordinarily eliminate reasonable cause for an unfair-practice allegation and the justification for injunctive relief as to those employees.
5. A line-pass process is therefore a practical means by which the employer identifies its asserted essential staffing need, the union tests that claim against reduced operations and available coverage, and the union may exempt employees necessary to protect public health and safety while preserving the strike rights of all remaining employees.

6. CalHR's refusal to continue that process after the Union announced the precise one-day duration, while simultaneously seeking injunctive relief based upon unresolved staffing proposals, constitutes a refusal and failure to bargain in good faith and unlawfully interferes with the Union's and represented employees' exercise of protected rights.
7. CalHR's conduct is particularly unlawful because its own representatives repeatedly stated that the strike's duration was necessary before departments could further reduce and finalize minimum staffing. Once that information was supplied, the Union repeatedly requested bargaining, offered PERB mediation, and offered extraordinary scheduling accommodations. CalHR nevertheless terminated negotiations and elected to ask PERB to determine which employees would be barred from striking.
8. CalHR cannot use the injunctive-relief process as a substitute for completing the factual and bargaining process necessary to determine the actual minimum staffing requirement, particularly where its own decision to discontinue negotiations prevented the Union from exempting additional employees from the strike.

DILLS ACT VIOLATIONS

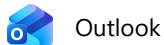
1. By the conduct described above, the State violated Government Code section 3519, subdivisions (a), (b), and (c), including by:
 - (a) refusing and failing to continue meeting and conferring in good faith regarding line passes and minimum staffing;
 - (b) terminating negotiations at the point when the parties had received the strike duration necessary to further refine staffing;
 - (c) refusing PERB-assisted mediation notwithstanding the Union's repeated requests and PERB's express availability;
 - (d) withholding or failing to timely provide information necessary to evaluate minimum staffing and identify individual line-pass employees;
 - (e) seeking to restrict represented employees' protected right to participate in the strike without first making reasonable efforts to complete the line-pass process; and
 - (f) interfering with the Union's ability to represent employees and to exempt from the strike those employees actually necessary to prevent an imminent and substantial threat to public health or safety.

REMEDIES REQUESTED

1. Order CalHR to cease and desist from refusing to participate in the line-pass/minimum-staffing process;

2. Order CalHR to immediately resume good-faith line-pass negotiations with SEIU Local 1000, including PERB-assisted mediation if requested;
3. Order CalHR to promptly provide revised one-day minimum-staffing proposals, outstanding reduced-operation and replacement information, and employee schedules necessary to complete the line-pass process;
4. Order CalHR to cease interfering with employees' protected right to participate in the strike and the Union's right to represent those employees;
5. Decline, defer, or otherwise preclude CalHR from obtaining injunctive relief based upon staffing claims that CalHR refused to complete through the line-pass process, or provide such other appropriate relief to prevent CalHR from obtaining an advantage from its refusal to continue negotiations;
6. Order appropriate notice-posting and electronic distribution remedies; and
7. Grant such additional relief as PERB determines necessary to effectuate the purposes of the Dills Act.

Exhibit 1



Outlook

Re: Information Request SEIU Local 1000 Line Pass Negotiations

From Giese, Anne <[REDACTED]>

Date Thu 10/8/2026 3:17 PM

To LinWalsh, Brian@CalHR [REDACTED]; Shiners, Erich@CalHR [REDACTED]

Cc Pierman, Brooke <[REDACTED]>; Sims, Kenny [REDACTED]

Hi Erich and Brian -

As we previously indicated, when our strike announcement came out, we were prepared to resume and complete the Line Pass process in order to ensure that reduced operations satisfy the competing interests of each side consistent with PERB legal standards. We stand ready to resume ongoing Line Pass talks given that you understand the time and duration of the announced strike action. We need to fully utilize the time we have to identify reduced operations and then proceed to identify the 4-5000 employees by name who will satisfy the Line Pass process.

We urge you to make this the top priority tomorrow, this weekend and the early part of next week. The Union is prepared to address your modified operations numbers. However, this cannot be accomplished in a vacuum or unilaterally. It must be done with the parties and departments at the table, and this may mean dividing into departmental working groups.

Please resume this process with all due haste.

Thank you,
Anne

From: LinWalsh, Brian@CalHR [REDACTED]

Sent: Tuesday, October 6, 2026 11:30 AM

To: Giese, Anne [REDACTED]; Shiners, Erich@CalHR [REDACTED]

Cc: Pierman, Brooke [REDACTED]; Sims, Kenny [REDACTED]

Subject: RE: Information Request SEIU Local 1000 Line Pass Negotiations

External sender [REDACTED] >

Make sure you trust this sender before taking any actions.

Hi Anne,

Attached, are the charts for CalTrans and CHP, and the information from CalTrans on holiday staffing.

Responsive to below, once we have the specific information on date and duration, management will need to begin to identify staffing, operational constraints such as scheduled medical procedures and services, reaching out to registry providers, etc. which we will expedite, but it is not likely this will be the turn around as outlined below. As such, we do not agree to keeping the meetings on calendar. I have informed management the meetings have been taken off calendar and I have rescinded the associated release time for October 8 and 9.

PERB Received
10/09/26 16:16 PM

Additionally, I have connected with our folks and based on those discussions the holiday pay data you are seeking will not result in a reliable check on the numbers. The reason for this is that departments with 24/7 operations do not typically key holiday pay for the employee if it's their regularly scheduled shift, making the holiday pay data unreliable for departments like CDCR/CCHCS/DSH/CalVet.

Please let me know if you have any questions.

Thank you.

Brian E. Lin Walsh

Principal Labor Relations Officer
California Department of Human Resources
1515 S Street, Suite 400
Sacramento, CA 95811

From: Giese, Anne [REDACTED]
Sent: Monday, October 5, 2026 5:38 PM
To: LinWalsh, Brian@CalHR <[REDACTED]>; Shiners, Erich@CalHR [REDACTED]
Cc: BPierman [REDACTED]; Sims, Kenny <[REDACTED]>
Subject: Re: Information Request SEIU Local 1000 Line Pass Negotiations

Caution: This email has been received from outside the organization. Think before you click, and open attachments only if you recognize the sender and know the content is safe.

Brian -

Thanks for your quick response, and we're encouraged that the State is serious about working on revisions. However, we don't think we should take Thursday and Friday (or the weekend) off calendar. We're already working within a shortened timeline, and there's significant work remaining on the staffing numbers and on the identification of individual employees. From our POV, we think it's critical to use Thursday afternoon with the departments to identify what, if anything, changes in their current proposals and to continue addressing the outstanding information requests. Likewise, we'd like to keep Friday available for continued line-pass discussions, preferably with the assistance of a PERB mediator as we discussed. If particular departments need additional time to revise their numbers, we can sequence the discussions accordingly rather than lose the rest of the week. Perhaps we can move forward this week with some departments while others are under review?

Please also send the current CHP and CalTrans charts as soon as possible. Even if those numbers are later refined based on the duration of the strike, having the current proposals will allow us to begin our review and identify questions in advance.

More broadly, since the departments have already identified the classifications, worksites, shifts, proposed minimum staffing levels, and replacement resources, they should quickly be able to pivot to refine their proposals, not suspend the process of meeting together. The Union remains available to work quickly and definitively on these important matters. Time is of the essence, as we know.

Thanks
Anne

From: LinWalsh, Brian@CalHR [REDACTED]
Sent: Monday, October 5, 2026 4:08 PM

PERB Received

To: Giese, Anne <[REDACTED]>; Shiners, Erich@CalHR <[REDACTED]>
Cc: Pierman, Brooke <[REDACTED]>; Sims, Kenny <[REDACTED]>
Subject: RE: Information Request SEIU Local 1000 Line Pass Negotiations

External sender [REDACTED]

Make sure you trust this sender before taking any actions.

Hi Anne,

Great news! As we have discussed, knowing the specific date and duration will substantially assist management in determining its minimum staffing needs for essential employees. However, this also means that we will not be able to make the 8th or 9th, as management will need that time to reassess its needs based on the new information. How does your availability next week look? I know I have committed to providing the minimum staffing charts for CHP and CalTrans, and I can provide the current CalTrans and CHP numbers, but I feel that these may not be productive at this time as once we have the date and duration on Thursday, those charts may be amended as well. Please let me know if you would like the current charts, or would prefer to wait on those until management has an opportunity to reassess based on the information it will receive on Thursday. We continue to follow up with the departments on the outstanding information being sought and will continue to provide this information on a flow basis by department.

I will move to take the meetings off calendar for Thursday and Friday, and I will look out for your availability over next week so we can continue to move forward with our discussions.

Thank you.

Brian E. Lin Walsh

Principal Labor Relations Officer
California Department of Human Resources
1515 S Street, Suite 400
Sacramento, CA 95811
[REDACTED]

From: Giese, Anne <[REDACTED]>
Sent: Monday, October 5, 2026 1:51 PM
To: LinWalsh, Brian@CalHR <[REDACTED]>; Shiners, Erich@CalHR <[REDACTED]>
Cc: BPierman <[REDACTED]>; Sims, Kenny <[REDACTED]>
Subject: Re: Information Request SEIU Local 1000 Line Pass Negotiations
Importance: High

Caution: This email has been received from outside the organization. Think before you click, and open attachments only if you recognize the sender and know the content is safe.

Hi Erich and Brian,

As additional follow-up to our discussions, thank you for providing department information thus far, but to avoid the potential for any unnecessary delay in this process, I wanted to lay out an anticipated schedule for the

remainder of the line-pass process so we can make sure the departments are prepared.

In the event that strike authorization is approved by the members, we anticipate making an announcement to our members approximately on Thursday morning regarding the results and potentially including more specific information regarding the timing and duration of any potential strike. Once that information is available to our represented workers, it would be appropriate to pre-plan for an additional line pass meeting Thursday afternoon with our respective teams (including the affected departments) to address the remaining information issues and continue narrowing line-pass numbers.

In the interest of ensuring sufficient time to resolve open issues with line passes, it is in both parties' interests for departments to immediately begin identifying the employees within the relevant classifications who are actually scheduled to work during the anticipated strike period. Our goal would be to have the proposed names and contact information for those employees on affected shift(s) available by Friday (Oct. 9) so we can move promptly from departments and classification to the actual line-pass lists (with employee names). As a reminder, individual employees staffing specific shifts, should be provided in electronic tables identifying employee name, department, classification, shift and contact information rather than in typed or copied documents, screenshots, pdfs, or hand-written notes. These types of formats will just delay reaching a final understanding of minimum staffing

I would also like to pre-arrange two things for Friday, Oct. 9 and the immediate weekend.

1. We'll be requesting from PERB provide a mediator for our scheduled meeting on Friday afternoon to assist with continued line-pass discussion.
2. We should plan on meeting through the weekend with the mediator, as necessary, to complete the line-pass lists and resolve any remaining issues promptly.

If we can meet this schedule, then we anticipate returning any proposed employee substitutions or swaps by Monday or Tuesday (Oct. 12-13) so that the parties can finalize the individual line-pass lists and clearly identify which employees are expected to report and which employees are free to participate in the strike.

Further, on outstanding questions, contentions and information needed, to continue to keep this process productive, below I will reiterate the requests we made from the departments and points made regarding staffing. Please have the departments respond as soon as possible to the following points for the classifications that remain significantly at issue in order to final affected employee numbers:

- **CDE**
 - Counselors/Night Attendants: reduced-staffing practices when employees are absent, including supervisor/cross-class coverage and any Labor Day or Memorial Day staffing that better reflects in-session reduced operations.
 - RNs: supervisory RN, on-call, and 12-hour shift coverage by school.
 - Food service: in-session holiday or other reduced-operation staffing, and whether boxed meals or outside food can be used during a short strike.
 - Security Guard: using CHP as an alternative, given CHP authority on state worksites.
- **CalVet**
 - Overall, a better match to Premium Holiday (PH) staffing model is expected.
 - CNAs/LVNs/RNs: better utilization of SRNs, Psych Techs and registry as replacement coverage.
 - Custodians: reduced-duty staffing for essential sanitation only.
 - FST I/II: further meal-service reductions and adjustments to the food preparation schedule are feasible.
- **DDS**
 - RNs: a closer match to PH staffing is expected. Records show that PH staffing is at 22, not the requested 37. (In addition, please provide current staff numbers as well, as our records show 4 incumbents.) RN (Safety), supervisors, or Central Nursing Services are able to provide additional coverage.

PERB Received

10/09/26 16:16 PM

- HSS: a closer match to PH staffing is expected. Records show that PH staffing is at 8, not the requested 11. Please provide current staff numbers as well as our records show 3 incumbents. If so, what alternate coverage is normally used.
- Dispatcher-Clerks: records show that 4 is the PH staffing norm. However, our information indicates that the minimum functional need is less and supervisory coverage can reduce the number.
- CDCR
 - DAPO Program Technicians: our information indicates that the minimum functional need is less - 1 per shift and supervisory coverage can reduce the number as well as reducing non-essential services.
 - CSC - a closer match to PH minimums and Third Watch staffing at each affected watch is expected.
- CCHCS
 - RN/LVN/CNA/CSC: updated Premium Holiday reduced-operation staffing by institution, classification and shift is needed to justify the current proposal
- DSH
 - Overall, it is expected the proposal should be a closer match to PH staffing by reducing non-essential services. Further details as follows:
 - RN (Safety): our information on unit-by-unit minimum indicates that one-RN-per-unit/12-hour model is sufficient.
 - HSS: our information is that HSS staffing can be addressed by including supervisory RN/Central Nursing Services coverage.
 - LVN (Safety): available Psychiatric Technician or other qualified coverage.
 - Custodians: reduced-duty staffing for essential sanitation only.
 - Pharmacy Techs: reconcile the reported July 4 staffing with the current incumbent count and proposed line-pass number.
- CHP
 - Although no minimum staffing proposal has been provided, overall, we categorically oppose the inclusion of the indicated classifications of IT, Cook Specialists, Food Service Techs and Custodians. Supervisors, vendors, box meals can provide the minimal services that may be needed. This department did not meet the standard of review in 2016, and nothing material has changed regarding this department for the purpose of the applicable standard.

This list above is not intended to replace or negate other information requests, positions or input on any other classification currently under review.

Thank you for your ongoing cooperation through this process.

Anne

From: LinWalsh, Brian@CalHR [REDACTED]
Sent: Saturday, October 3, 2026 10:11 AM
To: Giese, Anne [REDACTED] Shiners, Erich@CalHR [REDACTED]
Cc: Pierman, Brooke <[REDACTED]>; Sims, Kenny [REDACTED]
Subject: RE: Information Request SEIU Local 1000 Line Pass Negotiations

External sender [REDACTED]

Make sure you trust this sender before taking any actions.

Hi Anne,

Received. If we have any questions we will reach out.

Thank you.

Brian E. Lin Walsh

Principal Labor Relations Officer
California Department of Human Resources
1515 S Street, Suite 400
Sacramento, CA 95811
[REDACTED]

From: Giese, Anne [REDACTED]
Sent: Friday, October 2, 2026 7:28 PM
To: LinWalsh, Brian@CalHR <[REDACTED]>; Shiners, Erich@CalHR <[REDACTED]>
Cc: BPierman <[REDACTED]>; Sims, Kenny [REDACTED]
Subject: Fw: Information Request SEIU Local 1000 Line Pass Negotiations

Caution: This email has been received from outside the organization. Think before you click, and open attachments only if you recognize the sender and know the content is safe.

Hi Brian,

This reiterates the request we discussed earlier today:

- We are requesting BU Profile Data from the Premium Pay Report that captures all "Holiday Pay" payments for Calendar year 2025 and if available for January to August 2026.
 - Please provide this data by Department and Classifications, and if available by Facility/Worksite for: CDCR, CDCR-DAPO, CCHCS, DDS - Porterville and Canyon Springs, DSH, and CalVET.
 - Please provide Holiday Payment for CDE for Memorial Day and Labor day for 2025 and 2026.
- Please provide this information by worksite and classification.

Please feel free to contact Kenny Sims if you have any questions or want to chat about this.

Thanks

Anne

Exhibit 2



ANICA WALLS
President

DAVID JIMENEZ
Vice President/
Secretary-Treasurer

DELONNE JOHNSON
Board Chair

BOBBY DALTON ROY
Chief Negotiator

**SERVICE EMPLOYEES
INTERNATIONAL UNION
SOC, CLC**

**1808 14th Street
Sacramento, CA 95811**

October 8, 2026

Erich Shiners
Principal Labor Relations Counsel
Legal Division
California Department of Human Resources
1515 S Street, North Building, Suite 500
Sacramento, CA 95811

RE: SEIU Local 1000's Notice of Unfair Practice Strike

Dear Erich:

SEIU Local 1000 hereby provides notice that, following authorization by its members, the Union will conduct an Unfair Practice Strike involving eligible represented employees in Bargaining Units 1, 3, 4, 11, 14, 15, 17, 20, and 21.

The strike will occur on October 21, 2026, from 12:00 a.m. to 11:59 p.m. Employees will return to work with their next regularly scheduled shift following the strike except for those employees designated as essential workers consistent with applicable procedures and/or negotiated terms.

The Union will continue working with CalHR to finalize minimum staffing and line-pass arrangements necessary to protect public health and safety consistent with PERB requirements.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anne M. Giese".

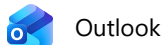
ANNE M. GIESE
Chief Counsel
SEIU Local 1000

AMG:mw

cc: Monica Erickson, Director, CalHR (via email –



Exhibit 3



RE: Notice of Intent to Request Injunctive Relief (State v. SEIU)

From Shiners, Erich@CalHR <[REDACTED]>
Date Fri 10/9/2026 11:44 AM
To Giese, Anne <[REDACTED]>; Joseph Eckhart <[REDACTED]>
Cc Brendan P. White <[REDACTED]>; Jessica Kim <[REDACTED]>; ksteele <[REDACTED]>

External sender <[REDACTED]>

Make sure you trust this sender before taking any actions.

Good morning,

CalHR does not believe further Line Pass discussions would be productive.

We are preparing to file our IR papers this afternoon and will await the Board's determination of which employees are essential.

Erich W. Shiners (he/him/his)



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. **If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Do not print, copy, or forward.**

From: Giese, Anne <[REDACTED]>
Sent: Friday, October 9, 2026 11:19 AM
To: Joseph Eckhart <[REDACTED]>; Shiners, Erich@CalHR <[REDACTED]>
Cc: Brendan P. White <[REDACTED]>; Jessica Kim <[REDACTED]>; ksteele <[REDACTED]>
Subject: Re: Notice of Intent to Request Injunctive Relief (State v. SEIU)

Caution: This email has been received from outside the organization. Think before you click, and open attachments only if you recognize the sender and know the content is safe.

Thank you for this email. SEIU Local 1000 is also urging an immediate return to Line Pass discussions including with the addition of PERB mediators. Again yesterday, the Union reiterated to CalHR that we need to make the Line Pass process a top priority, including meeting today, through the weekend, and early next week, and we offered to divide into departmental working groups if necessary.

PERB Received

10/09/26 16:16 PM

We are very concerned about losing critical time. CalHR unilaterally cancelled the previously scheduled meetings this week. The Union remains fully prepared to meet immediately and throughout the weekend to narrow the remaining numbers and move to identification of individual line-pass employees.

We would appreciate PERB's assistance in getting the parties back to the Line Pass process as soon as possible. CalHR has not responded to our latest request to restart discussions immediately. Our email is quoted below for reference.

Thank you,
Anne

From: Giese, Anne [REDACTED] >
Sent: Thursday, October 8, 2026 3:17 PM
To: LinWalsh, Brian@CalHR [REDACTED]; Shiners, Erich@CalHR [REDACTED]
<[REDACTED]>
Cc: Pierman, Brooke <[REDACTED]>; Sims, Kenny [REDACTED] >
Subject: Re: Information Request SEIU Local 1000 Line Pass Negotiations

Hi Erich and Brian -

As we previously indicated, when our strike announcement came out, we were prepared to resume and complete the Line Pass process in order to ensure that reduced operations satisfy the competing interests of each side consistent with PERB legal standards. We stand ready to resume ongoing Line Pass talks given that you understand the time and duration of the announced strike action. We need to fully utilize the time we have to identify reduced operations and then proceed to identify the 4-5000 employees by name who will satisfy the Line Pass process.

We urge you to make this the top priority tomorrow, this weekend and the early part of next week. The Union is prepared to address your modified operations numbers. However, this cannot be accomplished in a vacuum or unilaterally. It must be done with the parties and departments at the table, and this may mean dividing into departmental working groups.

Please resume this process with all due haste.

Thank you,
Anne

From: Joseph Eckhart [REDACTED] >
Sent: Thursday, October 8, 2026 4:37 PM
To: Giese, Anne <[REDACTED]>; Shiners, Erich@CalHR [REDACTED]
Cc: Brendan P. White [REDACTED]; Jessica Kim [REDACTED]
Subject: RE: Notice of Intent to Request Injunctive Relief (State v. SEIU)

Warning: Unusual sender [REDACTED]

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Received by PERB. We encourage CalHR to file its papers as soon as possible, even before 24 hours has elapsed. We will advise SEIU of its deadline to respond after CalHR files its request.

PERB Received

10/09/26 10:16 PM

We also encourage the parties to continue their line pass negotiations. If the parties need assistance, PERB has attorneys available tomorrow, this weekend, and next week to assist the parties with line pass mediation. We have had good results with parties using multiple mediators when there are a large number of positions and departments involved. Please advise your availability and we will assign a PERB attorney or attorneys to mediate.



Joseph Eckhart
Interim General Counsel
Public Employment Relations Board
1515 Clay Street, Suite 802
Oakland, CA 94612
[REDACTED]

From: Giese, Anne [REDACTED]
Sent: Thursday, October 8, 2026 4:33 PM
To: Shiners, Erich@CalHR [REDACTED]; Joseph Eckhart [REDACTED] >
Subject: Re: Notice of Intent to Request Injunctive Relief (State v. SEIU)

[REDACTED]
Received.

From: Shiners, Erich@CalHR [REDACTED]
Sent: Thursday, October 8, 2026 3:21 PM
To: Joseph Eckhart <[REDACTED]>; Giese, Anne [REDACTED]
Subject: Notice of Intent to Request Injunctive Relief (State v. SEIU)

External sender [REDACTED]

Make sure you trust this sender before taking any actions.

Mr. Eckhart and Ms. Giese,

Pursuant to PERB Regulation 32450, subdivision (c), please be advised that the California Department of Human Resources intends to file a request for injunctive relief against Service Employees International Union Local 1000 no less than 24 hours after this notice. CalHR received SEIU's strike notice (attached) earlier this afternoon. The request for injunctive relief will seek to enjoin an anticipated strike by SEIU-represented state workers commencing at 12:00 a.m. on Wednesday, October 21, 2026, and lasting until 11:59 p.m. that same day. The request will be made on the grounds that the strike is an illegal pre-impassé strike and will pose an imminent and substantial threat to public health and safety.

Erich W. Shiners (he/him/his)
Principal Labor Relations Counsel | Legal Division
[California Department of Human Resources](#)
[REDACTED]

1515 S Street, North Building, Suite 500 | Sacramento, CA 95811



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or

PERB Received

distribution is prohibited

If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Do not print, copy, or forward.

10/09/2016 11:16 PM