

STEWART WEINBERG  
DAVID A. ROSENFELD  
WILLIAM A. SOKOL  
BLYTHE MICKELSON  
BARRY E. HINKLE  
JAMES J. WESSER  
ANTONIO RUIZ  
MATTHEW J. GAUGER  
ASHLEY K. IKEDA  
LINDA BALDWIN JONES  
PATRICIA A. DAVIS  
ALAN G. CROWLEY  
KRISTINA L. HILLMAN\*\*  
EMILY P. RICH  
BRUCE A. HARLAND  
CONCEPCIÓN E. LOZANO-BATISTA  
CAREN P. SENCER  
ANNE I. YEN  
KRISTINA M. ZINNEN  
JANNAH V. MANANSALA  
MANUEL A. BOIGUES\*\*\*  
KERIANNE R. STEELE\*\*  
GARY P. PROVENCHER  
EZEKIEL D. CORDER\*\*\*\*  
MONICA T. GUIZAR  
SHARON A. SEIDENSTEIN  
LISL R. SOTO

## WEINBERG, ROGER & ROSENFELD

A Professional Corporation  
1001 Marina Village Parkway, Suite 200  
Alameda, CA 94501  
TELEPHONE (510) 337-1001  
FAX (510) 337-1023  
WWW.UNIONCOUNSEL.NET

SEAN D. GRAHAM  
JOLENE KRAMER  
ANTHONY J. TUCCI  
ROBERT E. SZYKOWNY  
MICHAEL D. BURSTEIN  
ALEJANDRO DELGADO  
MINSU D. LONGIARU\*\*\*\*\*  
CAROLINE N. COHEN  
XOCHITL A. LOPEZ  
CAITLIN E. GRAY  
TIFFANY CRAIN ALTAMIRANO\*\*  
RYAN B. KADEVARI  
ANDREA E. BRUSS

VINCENT A. HARRINGTON, Of Counsel  
PATRICIA M. GATES, Of Counsel  
ROBERTA D. PERKINS, Of Counsel  
NINA FENDEL, Of Counsel  
TRACY L. MAINGUY, Of Counsel\*\*\*\*\*  
CHRISTIAN L. RAISNER, Of Counsel  
THEODORE FRANKLIN, Of Counsel

\* Admitted in Hawaii  
\*\* Also admitted in Nevada  
\*\*\* Also admitted in Illinois  
\*\*\*\* Also admitted in New York and Alaska  
\*\*\*\*\* Also admitted in New York and Michigan  
\*\*\*\*\* Also admitted in Florida

December 16, 2016

### VIA ELECTRONIC FILING

Regional Director  
National Labor Relations Board, Region 21  
888 S. Figueroa Street, 9th Floor  
Los Angeles, CA 90017

**Re: SEIU, United Healthcare Workers-West  
Pomona Valley Medical Center  
(Unfair Labor Practice Charge – Intimidation/Harassment by Tony Torres)**

Dear Regional Director:

Attached is an unfair labor practice charge we are filing on behalf of the above Union. Please process this charge upon receipt. The Board Agent assigned to the case should contact Jason Capell, of the Union, at 323-236-4917, for further evidence.

Please keep me informed of all phases of the investigation, give me copies of all evidence submitted by the Charging Party, furnish me with any statements they provide, include me in any settlement discussions, and keep me informed of any agency decisions.

Sincerely,

  
Bruce A. Harland

BAH:rfb  
opeiu 29 afl-cio(1)

Attachment

cc: Greg Pullman  
Norma Gutierrez  
Jason Capell

1\894602

INTERNET  
FORM NLRB-501  
(2-08)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

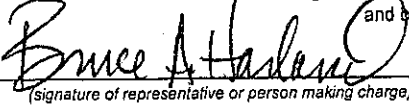
DO NOT WRITE IN THIS SPACE

Case

Date Filed

## INSTRUCTIONS:

File an original with NLRB Regional Director for the Region in which the alleged unfair labor practice occurred or is occurring

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Pomona Valley Hospital Medical Center	b. Tel. No. 909.865.9501 c. Cell No. f. Fax No. 909.623.4021
d. Address (Street, city, state, and ZIP code) 1798 N. Garey Avenue, Pomona, CA 91767	e. Employer Representative Richard Yochum, CEO g. e-Mail h. Number of workers employed
i. Type of Establishment (factory, mine, wholesaler, etc.) Hospital	j. Identify principal product or service Healthcare
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  Within the last six months immediately preceding the filing of this charge, the above named employer, by and through its agents, violated Sections 8(a)(1) of the Act, when Tony Torres, the EVS Supervisor, intimidated, harassed, and threatened a worker by demanding to know why she was wearing a Union pulley and then telling her that because she wore the pulley she would not receive future promotions.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) SEIU United Healthcare Workers-West	
4a. Address (Street and number, city, state, and ZIP code) 5480 Ferguson Drive Los Angeles, CA 90022	4b. Tel. No. (323) 734-8399 4c. Cell No. 4d. Fax No. (323) 721-3538 4e. e-Mail
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. By:  Bruce A. Harland, Attorney (signature of representative or person making charge) (Print/Type name and title or office, if any)	
Address: WEINBERG, ROGER & ROSENFELD 1001 Marina Village Parkway, Suite 200 Alameda, CA 94501 December 16, 2016 (date)	
Tel. No. (510) 337-1001 Office, if any, Cell No. Fax No. (510) 337-1023 e-Mail bharland@unioncounsel.net	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

1\894590

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.