

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 Prime Healthcare Services d/b/a St. Francis Medical Center	
b. Tel. No. 310-900-8453	
c. Cell No.	
f. Fax No. 310-900-7322	
g. e-mail	
h. Number of workers employed Approx. 560 in bargaining unit	
d. Address (Street, city, state, and ZIP code) 3630 East Imperial Highway Lynwood, CA 90262	e. Employer Representative Barbara DeGiuseppe, Human Resources Director, bdegiuseppe@primehealthcare.com Rich Martwick, Associate General Counsel, rmartwick@primehealthcare.com
i. Type of Establishment (factory, mine, wholesaler, etc.) Health Care Provider	j. Identify principal product or service Health Care
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) 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 practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, the Employer, through its managers, supervisors, and agents, has interfered with, restrained, and coerced employees in the exercise of their rights under Section 7 of the National Labor Relations Act and/or discriminated in regard to tenure and terms and conditions of employment to discourage membership in a labor organization by pretextually terminating St. Francis Registered Nurses Association member Maricela Garay-Barajas in retaliation for engaging in protected concerted activity and union activity at Prime Healthcare Services Corporate Headquarters. Due to the egregiousness of the Employer's conduct, Charging Party requests expedited processing and 10(j) injunctive relief.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) United Nurses Associations of California/Union of Health Care Professionals, NUHHCE, AFSCME, AFL-CIO	
4a. Address (Street and number, city, state, and ZIP code) 955 Overland Ct., Suite 150 San Dimas, CA 91773-1718	
4b. Tel. No. 909-288-2729	
4c. Cell No.	
4d. Fax No. 909-599-8655	
4e. e-mail legal@unacuhcp.org	
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) National Union of Hospital and Health Care Employees, AFSCME, AFL-CIO	
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.  (signature of representative or person making charge)	
Bryan Lopez and Jun Lim, Legal Counsel (Print/type name and title or office, if any)	
Tel. No. 909-288-2729 and 909-407-2117	
Office, if any, Cell No.	
Fax No. 909-599-8655	
e-mail bryan.lopez@unacuhcp.org; jun.lim@unacuhcp.org	
Address <u>955 Overland Ct., Ste. 150, San Dimas, CA 91773</u> Date <u>December 26, 2023</u>	

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

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 may cause the NLRB to decline to invoke its processes.