



PERB
California Public Employment
Relations Board

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October 6, 2026

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16501 Ventura Blvd., Suite 304
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Patrick Bruso, Senior Deputy County Counsel
Marc Gallonio, Labor Relations Manager
County of Orange
400 W. Civic Center Drive, Suite 202
Santa Ana, CA 92701

Teri L. Maksoudian, Senior Deputy County Counsel
County of Orange
333 W. Santa Ana Blvd., Suite 407
Santa Ana, CA 92701

Re: *International Brotherhood of Teamsters, Local 952 v. County of Orange*
Unfair Practice Charge No. LA-CE-1877-M
COMPLAINT

Dear Parties:

The Office of the General Counsel has issued the enclosed COMPLAINT in the above-entitled matter. The Respondent is required to file an **ANSWER** within twenty (20) calendar days from the date of service of the COMPLAINT, pursuant to PERB Regulation 32644.¹ The required contents of the **ANSWER** are described in PERB Regulation 32644(b).

If you have not filed a Notice of Appearance form, one should be completed and returned with your **ANSWER**. Please be aware that once legal counsel is designated,

¹ PERB's Regulations are codified at California Code of Regulations, title 8, section 31001 et seq. The text of PERB's Regulations may be found at www.perb.ca.gov.

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PERB will only correspond with that individual(s).

An informal settlement conference will be scheduled shortly. Please direct all inquiries, filings and correspondence to the undersigned. Designated legal counsel who do not attend the Informal Conference for any reason, must designate in writing consent that the meeting go forward in their absence, including, but not limited to the execution of a settlement agreement.

Sincerely,

/s/ Ricardo Martinez

Ricardo Martinez
Regional Attorney

RM

Enclosure

STATE OF CALIFORNIA
PUBLIC EMPLOYMENT RELATIONS BOARD



INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, LOCAL 952,

Charging Party,

v.

COUNTY OF ORANGE,

Respondent.

Case No. LA-CE-1877-M

COMPLAINT

It having been charged by Charging Party that Respondent engaged in unfair practices in violation of Government Code section 3500 et seq., the General Counsel of the Public Employment Relations Board (PERB), pursuant to Government Code sections 3509(b) and 3541.3(i) and California Code of Regulations, title 8, section 32640, issues this COMPLAINT on behalf of PERB and ALLEGES:

1. Charging Party is an exclusive representative, within the meaning of PERB Regulation 31190, of an appropriate unit of employees.
2. Respondent is a public agency within the meaning of Government Code section 3501(c) and PERB Regulation 32016(a).

SURFACE BARGAINING

3. During the period from March 2026 through July 29, 2026, Respondent and Charging Party were meeting and conferring pursuant to Government Code section 3505.
4. During this period, Respondent engaged in the following conduct: failing to vest negotiators with sufficient authority to conduct meaningful negotiations; failing to provide counterproposals; engaging in dilatory and evasive tactics; failing to prepare

adequately for negotiations; and threatening that wage increases for the bargaining unit would result in layoffs.

5. By the acts and conduct included in, but not limited to, those described in paragraph 4, Respondent failed and refused to meet and confer in good faith with Charging Party in violation of Government Code sections 3505 and 3506.5(c), and committed an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(c).

6. This conduct also interfered with the rights of bargaining unit employees to be represented by Charging Party in violation of Government Code sections 3506 and 3506.5(a), and is an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(a).

7. This conduct also denied Charging Party its right to represent bargaining unit employees in violation of Government Code sections 3503 and 3506.5(b), and is an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(b).

INTERFERENCE

8. On or about June 29, 2026, and July 6, 2026, Respondent asserted that wage increases for bargaining unit employees would result in layoffs.

9. By the acts and conduct described in paragraph 8, Respondent interfered with employee rights guaranteed by the Meyers-Milias-Brown Act in violation of Government Code sections 3506 and 3506.5(a), and committed an unfair practice under Government Code section 3509(b) and PERB Regulation 32603(a).

10. This conduct also denied Charging Party its right to represent employees in violation of Government Code sections 3503 and 3506.5(b), and is an unfair practice

under Government Code section 3509(b) and PERB Regulation 32603(b).

Any amendment to the complaint shall be processed pursuant to California Code of Regulations, title 8, sections 32647 and 32648.

DATED: October 6, 2026

Joseph Eckhart
Interim General Counsel

By /s/ Gabriel Orea
Gabriel Orea
Regional Attorney

PROOF OF SERVICE

I declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within entitled cause. The name and address of my residence or business is Public Employment Relations Board, Los Angeles Regional Office, 425 W. Broadway, Suite 400, Glendale, CA, 91204-1269.

On October 6, 2026, I served the Complaint and Cover Letter regarding Case No. LA-CE-1877-M on the parties listed below by

____ I am personally and readily familiar with the business practice of the Public Employment Relations Board for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Los Angeles, California.

____ Personal delivery.

X Electronic service (e-mail).

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 6, 2026, at Glendale, California.

J. Carter

(Type or print name)

/s/ J. Carter

(Signature)