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WEINBERG, ROGER & ROSENFELD
A PROFESSIONAL CORPORATION

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June 25, 2007

VIA FACSIMILE & U.S. MAIL

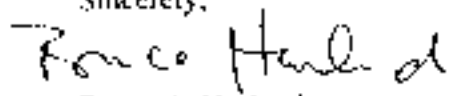
Regional Director
NLRB, Region 21
888 South Figueroa Street, 9th Floor
Los Angeles, CA 90017-5449

Re: SEIU, United Healthcare Workers -- West
Citrus Valley Medical Center

Dear Regional Director:

Enclosed please find six (6) separate unfair labor practice charges filed on behalf of SEIU, United Healthcare Workers -- West. Please begin to process these charges upon receipt of this fax. The original will be mailed to you. The Board agent assigned to the case should contact Sophia Mendoza, of the Union, at (213) 280-0449, who will furnish 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:rot
Enclosures
cc: Citrus Valley Medical Center Organizing Committee
-2- 2

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case

Date Filed

INSTRUCTIONS

File an original together with four copies and a copy for each additional charged party in Item 1 with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Cunus Valley Medical Center		b. Number of workers employed
c. Address (street, city, state, ZIP code) 1115 South Sunset Avenue West Covina, CA 91790	d. Employer Representative James Yoslioka	e. Telephone No. 626.962.4011
		Fax No.
f. Type of Establishment (factory, mine, wholesaler, etc.) Hospital	g. Identify principal product or service Healthcare	

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and 8(a)(3) of the National Labor Relations Act, and 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, violated Sections 8(a)(1) and 8(a)(3) of the Act, by intimidating, threatening, harassing, coercing, and discriminating against workers when a supervisor, named Ana, told workers to go and meet with a Union-buster and that they would lose benefits if they supported the Union.

By the above and other acts, the above-named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.

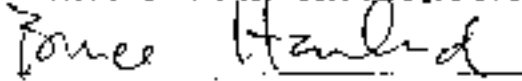
3. Full name of party filing charge (if labor organization, give full name, including local name and number)
SERU United Healthcare Workers - West

4a. Address (street and number, city, state, and ZIP code) 5480 Ferguson Drive, Los Angeles, CA 90022	b. Telephone No. (323) 888-8168
	Fax No. (323) 721-3538

5. Full name of national or international labor organization of which it is an affiliate or constituent unit to be filed 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  Signature of representative or person making charge Address 8001 Marina Village Pkwy, Suite 200 Alameda, CA 94501	Bruce A. Harland Telephone No. (510) 337-1000 Fax (510) 337-1023	File Attorney Date June 25, 2007
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WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
1/460590(LM)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

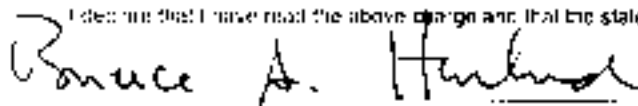
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INSTRUCTIONS

File an original together with four copies and a copy for each additional charged party in Item 1 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 Citrus Valley Medical Center	b. Number of workers employed
c. Address (street, city, state, ZIP code) 1115 South Sunset Avenue West Covina, CA 91790	d. Employer Representative James Yoshioka
	e. Telephone No 626.962.4011
	Fax No
f. Type of Establishment (factory, mine, wholesaler, etc.) Hospital	g. Identify principal product or service Healthcare
h. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and 8(a)(3) of the National Labor Relations Act, and 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, violated Sections 8(a)(1) and 8(a)(3) of the Act, by intimidating, threatening, harassing, coercing, and discriminating against workers who support the Union by engaging in unlawful surveillance of workers engaged in protected, concerted Union activity.	
By the above and other acts, the above-named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.	
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	b. Telephone No (323) 888-8168
	Fax No (323) 721-3538
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 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  Signature of representative or person filing charge Bruce A. Harland	_____ Title Attorney
Address 1001 Marina Village Pkwy, Suite 200 Alameda, CA 94501	Telephone No (510) 337-1001 Date June 25, 2007 (Fax) (510) 337-1023

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EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Citrus Valley Medical Center	b. Number of workers employed
c. Address (street, city, state, ZIP code) 1115 South Sunset Avenue West Covina, CA 91790	d. Employer Representative James Yoshioka
	e. Telephone No 626.962.4011
	Fax No.
f. Type of establishment (factory, mine, wholesaler, etc.) Hospital	g. Identify principal product or service Healthcare

1. The above named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and 8(a)(3) of the National Labor Relations Act, and 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, violated Sections 8(a)(1) and 8(a)(3) of the Act, by intimidating, threatening, harassing, coercing, and discriminating against workers when a group of supervisors and Union buster, Jack Bermudas, threatened that if workers supported the Union, then the employer would refuse to provide free food to workers.

By the above and other acts, the above named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.

3. Full name of party filing charge (if labor organization, give full name including local name and number):

SEU United Healthcare Workers - West

4a. Address (street and number, city, state and ZIP code):

5480 Ferguson Drive, Los Angeles, CA 90022

b. Telephone No

(323) 888-8168

Fax No.

(323) 721-3538

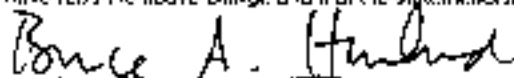
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization):

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 _____



his Attorney

Signature of representative or person making charge Bruce A. Harland

Address:

1001 Marina Village Pkwy, Suite 200
Alameda, CA 94501

Telephone No

(510) 337-1001

(Fax)

(510) 337-1023

Date

June 25, 2007

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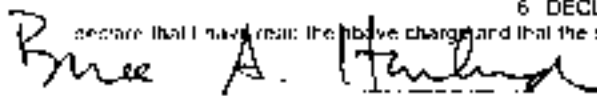
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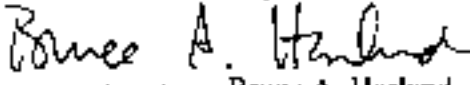
1. EMPLOYER AGAINST WHICH CHARGE IS BROUGHT	
a. Name of Employer Citrus Valley Medical Center	b. Number of workers employed
c. Address (street, city, state, ZIP code) 210 W. San Bernardino Road, Corona, CA 92723	d. Employer Representative James Yoshioka
	e. Telephone No. 626.331.7333
	Fax No.
f. Type of Establishment (factory, mine, wholesaler, etc.) Hospital	g. Identify principal product or service Healthcare
1. The above named employer has engaged in and is engaging in unfair labor practices within the meaning of sect. 8(a), subsections (1) and 8(a)(3) of the National Labor Relations Act, and 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)	
<p>Within the last six months, immediately preceding the filing of this charge, the above named employer, violated Sections 8(a)(1) and 8(a)(3) of the Act, by intimidating, threatening, harassing, coercing, and discriminating against workers when a group of supervisors and Union buster, Jack Bermudas, threatened that if workers supported the Union, then the employer would refuse to provide free food to workers.</p>	
By the above and other acts, the above named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.	
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	b. Telephone No. (323) 888-8168
	Fax No. (323) 721-3538
5. Full name of national or international labor organization of which this 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  Signature of representative or person making charge: Bruce A. Harland	Telephone No. (510) 337-1011 Date June 25, 2007
Address: 1001 Marina Village Pkwy, Suite 200 Alameda, CA 94501	(Fax) (510) 337-1023

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c. Address (street, city, state, ZIP code) 1115 South Sunset Avenue West Covina, CA 91790	d. Employer Representative James Yoshioka	e. Telephone No. 626.962.4011
		Fax No.
f. Type of establishment (factory, mine, wholesaler, etc.) Hospital	g. Identify principal product or service Healthcare	
h. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and 8(a)(3) of the National Labor Relations Act, and 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)		
<p>Within the last six months immediately preceding the filing of this charge, the above named employer, violated Sections 8(a)(1) and 8(a)(3) of the Act, when it enforced its unlawful and discriminatory no-solicitation/no-distribution rule.</p>		
By the above and other acts, the above-named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.		
3. Full name of party filing charge (if labor organization, give full name including local name and number) SEU United Healthcare Workers - West		
4a. Address (street and number, city, state, and ZIP code) 5480 Ferguson Drive, Los Angeles, CA 90022	b. Telephone No. (323) 888-8168	
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By Signature of representative or person making charge Address 1001 Marina Village Pkwy, Suite 200 Alameda, CA 94501	 Bruce A. Harland Telephone No. (510) 337-1001 Fax (510) 337-1023	File Attorney Date June 25, 2007

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		Fax No.	
f. Type of establishment (factory, store, wholesaler, etc.) Hospital		g. Identify principal product or service Healthcare	

1. The above named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (2)(B) of the National Labor Relations Act, and 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, violated Sections 8(a)(1) and 8(a)(2) of the Act, by intimidating, threatening, harassing, coercing, and discriminating against workers when a group of supervisors and Union Buster, Jack Bermudas, threatened that if workers supported the Union, then the employer would refuse to help them if they needed to request a day off.

By the above and other acts, the above named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.

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)

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By Bruce A. Harland True Attorney

Signature of representative or person making charge Bruce A. Harland

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