

INSTRUCTIONS: File the original and three copies of the complaint and all attachments and the \$300 filing fee with the Board at:

528 Cottage St NE, Suite 400  
Salem, Oregon 97301-3807  
Phone 503-378-3807

STATE OF OREGON  
EMPLOYMENT RELATIONS BOARD

UNFAIR LABOR PRACTICE COMPLAINT  
Public Employment

For Board Use Only

Case No. JP02114

Date Filed 7/21/16

<b>COMPLAINANT</b> Name, address, phone number, and e-mail address  Classified Association of Central Oregon Community College c/o Kevin Keaney 1631 NE Broadway, #540 Portland, Oregon 97232 503-232-9280 <a href="mailto:kevin@keaneylaw.com">kevin@keaneylaw.com</a>	<b>COMPLAINANT'S REPRESENTATIVE</b> Name, address, phone number, and e-mail address, if applicable  As indicated.  JUL 21 2016  EMPLOYMENT RELATIONS BOARD
<b>RESPONDENT</b> Name, address, phone number, and e-mail address  Central Oregon Community College 2600 NW College Way Bend, Oregon 97701 541-383-7700 <a href="mailto:amoore@cocc.edu">amoore@cocc.edu</a> <a href="mailto:laborlaw@managementlaw.net">laborlaw@managementlaw.net</a>	<b>RESPONDENT'S REPRESENTATIVE</b> Name, address, phone number, and e-mail address, if applicable  Alicia Moore As indicated.

Complainant alleges that Respondent has committed an unfair labor practice under ORS 243.672(1) (e) of the Public Employee Collective Bargaining Act. The following is a clear and concise statement of the facts involved in each alleged violation, followed by a specific reference to the section and subsection of the law allegedly violated. (For each claim, specific dates, names, places, and actions. Attach copies of main supporting documents referred to in the statement of claims.)

**In August 2014, the Association and College agreed to form a "task force" to review Classified employee salaries and make recommendations to their respective principals with regard to changes in the Classified salary table. Attachment A.**

**The work of the task force has resulted in (1) the retention of an outside consultant to review Classified wages and benefits and (2) the generation of reports, documents, and other materials pertaining to the work of the task force and proposed changes to the salary table.**

**On or about 2 July 2016, the Association submitted the following information request to the College pertaining to these reports, documents, and other materials:**

**Please produce the consultant's or contractor's report or reports, or any other report, including any associated or appended documents or other materials, with regard to the recent classified salary (wage and benefit) survey and adjustment of classified salaries.**

To date, the College has refused to respond to the information request and has not responded with the production of the requested reports, documents, or other materials.

I certify that the statements in this complaint are true to the best of my knowledge and information.

By: \_\_\_\_\_

Signature of Complainant or Complainant's Representative

*Kevin Keaney*

*Attorney*

Title

*7-13-16*

Date