LCW Liebert Cassidy Whitmore

Briefing Room

News and developments in employment law and labor relations for California Law Enforcement Management.

June 2018

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LCW NEWS

Briefing Room is published monthly for the benefit of the clients of Liebert Cassidy Whitmore. The information in ***Briefing Room*** should not be acted on without professional advice.

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POBR

OIG's Interviews of Correctional Officers Did Not Trigger POBR Right to Representation.

A California Court of Appeal dismissed a claim by correctional peace officers claiming that the Office of Inspector General (OIG) violated the Public Safety Officers Procedural Bill of Rights Act (POBR) by denying the officers' right to a representative during interviews about possible excessive force at a state prison where they previously worked.

The OIG is a state agency that oversees the California Department of Corrections and Rehabilitation (CDCR). In response to a request by the California Senate Rules Committee, the OIG reviewed policies and practices, and issued a report, relating to possible excessive force at a CDCR prison facility. California law requires the OIG to comply with such requests.

As part of its review, the OIG interviewed several correctional officers who previously worked at the prison. Each officer requested representation for the interview, but the OIG denied the requests and advised the officers that they were not under investigation and nothing said would be used to pursue an investigation or recommend an investigation be opened.

The officers sued, alleging that the OIG violated their POBR right to have a representative present at the interviews. The OIG, in turn, filed an anti-SLAPP motion to dismiss the action as a "Strategic Lawsuit Against Public Participation." California's Anti-SLAPP mechanism subjects a claim to dismissal if the conduct it challenges was done in furtherance of the defendant's constitutional free speech rights in connection with a public issue. An anti-SLAPP motion may still fail, however, if the court determines that there is a probability the plaintiff will prevail on the claim.

Here, the OIG interviewed the officers to gather information in preparation for publishing a report on a topic of widespread public interest. Because the report was legally required, the OIG's denial of representation during the interviews was legally protected speech.

The Court of Appeal also held that the officers did not show a likelihood of prevailing on their POBR claim. The POBR provides a right to representation when the officer "is under investigation and subjected to interrogation … that could lead to punitive action." But the POBR also expressly states that the right to representation does not apply to "any interrogation of a public safety officer in the normal course of duty, counseling, [or] instruction." Here, the Court of Appeal concluded that individual correctional officers were not under investigation for suspected misconduct. The officers were informed of this. Thus, the Court found, the officers lacked a reasonable basis to believe that the interviews with the OIG were interrogations that could lead to punitive action.

Blue v. California Office of the Inspector General (2018) 232 Cal. Rptr.3d 590.

NOTE:

Anti-SLAPP motions can serve as useful tools in defending public agencies against abuses of the judicial process. Such motions are particularly beneficial because they may delay expensive discovery until after the SLAPP issue is resolved, or forecloe discovery altogether if the case is dismissed.

QUALIFIED IMMUNITY

No-Consent Dog Search of Public Employee's Office Was Clearly Unlawful When Conducted, Negating Officer's Qualified Immunity Defense.

In a case out of Nevada that went to the U.S. Court of Appeals for the Ninth Circuit (which also covers California), a County sheriff's sergeant was sued for allegedly violating the Fourth Amendment rights of a city recreation director. The alleged violation was an after-hours dog search of the recreation director's office by the sergeant and other officers.

The sergeant – J. Brad Hester – and the recreation director – Richard Pike – had been unfriendly prior to the search. Hester attributed this to an incident where Pike, who also coached high school football, hit Hester's son – a player on the team – during a game. Hester's son was then benched and suspended a game for arguing with Pike.

On the night of the search, Hester used a key he had to unlock and enter the recreation center that housed Pike's office. He did so without a warrant and without permission. Hester, who led the search, was accompanied by two deputies and a drug-sniffing dog in an apparent drug-sweep of the center. As part of the sweep, Hester unlocked the door to Pike's shared office and entered with the dog and one of the deputies. The dog did not alert to drugs anywhere in the office.

The trial court concluded that the search was conducted in violation of the Fourth Amendment's prohibition on unreasonable searches and seizures. The Ninth Circuit agreed, but then turned to the question of qualified immunity. That is, said the court, if the constitutional right that Hester violated was not clearly established at the time of the search, Hester would be entitled to qualified immunity and thereby protected from liability. The court framed the question in terms of "whether a no-consent dog search of a public employee's office was clearly unlawful … when the search occurred." Finding that "Supreme Court and Ninth Circuit precedent easily resolve that question in the affirmative," the court referenced decades-old case law holding that an employee enjoys a reasonable expectation of privacy in a shared office and that, absent consent, an officer's search of a private office violates the Fourth Amendment.

The Ninth Circuit further held that the involvement of a dog did not change the outcome of the case, since at the time of the search, it was also "clearly established that dog sniff searches are exempt from Fourth Amendment protection only when the dog and accompanying officer are lawfully present."

Thus, the court concluded, Hester could not claim entitlement to qualified immunity.

NOTE:

Although this case arose outside of the employment context, it aids in delineating what kind of searches are considered "reasonable" under the Fourth Amendment, which may be a factor in a disciplinary decision involving a search by a police officer. Indeed, in this case, the sheriff's office suspended Hester without pay for 30 hours, finding that the search of Pike's office was "conduct unbecoming." It is worth noting, however, that just because an officer is entitled to qualified immunity against liability does not necessarily mean the officer should also be immune from discipline, particularly if the search is not objectively reasonable and the qualified immunity results merely from the fact that the courts have not yet addressed analogous circumstances to place the officer on notice.

DISCRIMINATION

Falsely Informing a Pregnant Job Candidate That No Positions Are Available May Be Actionable Under FEHA.

A recent case holds that an employer may be liable for discrimination under California's Fair Employment and Housing Act (FEHA) if it discourages a pregnant candidate from applying for a job by falsely representing that there are no employment opportunities available.

Ada Abed was an extern at a dental office in Napa, California. Her employer, Western Dental, regularly accepted externs from dental assistant training programs and considered them for full-time employment upon successful completion of the externship. At the time Abed began the externship, she was pregnant but did not disclose this to anyone at Western Dental.

During the externship, Abed's supervisor saw prenatal pills in Abed's partially opened purse and attempted to confirm Abed's pregnancy by asking other Western Dental staff. According to Abed, she overheard the supervisor tell a coworker that she did not want to hire Abed if she was pregnant. Abed also received text messages in which the same coworker confirmed to Abed that the supervisor said she did not want to hire Abed because of her pregnancy.

Soon after hearing the comment, Abed asked the supervisor whether there was an opening in Western Dental's Napa office, and the supervisor responded there was not. As a result, Abed did not apply for a position. However, Western Dental was accepting applications for an opening in Napa while Abed was still working there, and the position was filled shortly after Abed left. Abed sued for pregnancy discrimination under the FEHA based on her supervisor's representation that no positions were available in the Napa office.

Denying summary judgment to Western Dental, the Court of Appeal held that Abed presented sufficient evidence to proceed to a jury on her FEHA discrimination claim. In so holding, the court rejected Western Dental's argument that it had a legitimate reason for not hiring Abed – namely that she did not apply for a position. The court explained that Abed could not reasonably have been expected to apply after being told there was no available position in the Napa office.

Abed v. Western Dental Services, Inc. (2018) 233 Cal.Rptr.3d 242.

NOTE:

This case confirms that discouraging a pregnant applicant from applying for a job because of her pregnancy exposes an employer to liability. The fact that an applicant for initial hire, permanent hire, or promotion is pregnant should not be a factor in the employment decision.

WHISTLEBLOWING

Proximity Between Alleged Whistleblowing and Adverse Actions, Coupled with Evidence of Pretext, Sends Retaliation Case to Jury.

Carl Taswell, a physician certified in nuclear medicine, was hired to work at the University of California (UC) at Irvine's brain imaging center. Soon after he started, a colleague informed Taswell of potential safety and compliance problems at the center. Taswell immediately reported the information to Scott Goodwin, the chair of the university's radiology department, and within a couple of days, he made a report to the UC whistleblower hotline.

A few weeks later, Taswell raised his concerns with the UC radiation safety committee and then with state and federal authorities. He informed Goodwin of the state and federal reports he made.

Around the same time, Taswell and other employees with radiation-safety responsibilities visited a radiochemistry laboratory near the brain imaging center. Taswell took photos of what he believed were safety violations.

Approximately six weeks after Taswell initially reported the alleged violations at the brain imaging center to Goodwin and the UC whistleblower hotline, he was placed on paid administrative leave for entering the radiochemistry laboratory without authorization, pending an investigation, and told that his contract with the university would not be renewed. An independent investigation, commissioned by the university, later concluded that Taswell's entrance into the laboratory was not unauthorized.

Taswell ultimately sued the UC Regents for whistleblower retaliation based on multiple statutes including Labor Code section 1102.5. Although the trial court granted summary judgment to the Regents, the order was reversed on appeal.

The Court of Appeal found that Taswell had established that he suffered an adverse employment action – namely being placed on paid administrative leave and the non-renewal of his contract. The Court of Appeal also held that a triable issue of fact existed as to whether a causal connection could be drawn between Taswell's whistleblowing activities and the adverse employment actions he suffered. Moreover, although the Regents claimed to have articulated legitimate business reasons for these actions, the record contained evidence supporting a finding that these reasons were pretexts for retaliation. For example, whereas the stated reasons for the actions included Taswell's unauthorized entry into the radiochemistry laboratory, the evidence showed that Taswell was not reinstated after the university's independent investigator found that the entry was actually authorized. Another factor cited by the Regents, interpersonal difficulties that Taswell allegedly exhibited, was challenged by evidence that Taswell had behaved appropriately and further by evidence that other university employees were known to be challenging to work with.

Accordingly, Taswell's whistleblower case was allowed to proceed to a jury.

Taswell v. The Regents of the University of California (2018) 232 Cal.Rptr.3d 628.

NOTE:

This case reinforces a few important points. First, temporal proximity between an employee's protected activity and an adverse employment action is often the critical factor in establishing causation in retaliation cases. Second, this is one in a series of recent rulings in which paid administrative leave was found to constitute an adverse employment action.

DUE PROCESS

Local Rules Dictate Probationary Employee's Due Process Rights.

Richard Palm worked for the Los Angeles Department of Water and Power (LADWP) as a Steam Plant Assistant for 25 years before being promoted to Steam Plant Maintenance Supervisor. The promotion, however, came with a six-month probationary period.

According to Palm's allegations, he was forced to resign from the probationary position and return to his former role. Palm brought suit, claiming, among other things, that the LADWP violated his federal 14th Amendment right to due process.

The due process claim required Palm to demonstrate that he held a property interest in the supervisory position to which he was promoted. He failed to meet this burden, however, said the U.S. Court of Appeals for the Ninth Circuit.

In reaching its decision, the Ninth Circuit evaluated whether the City of Los Angeles Charter or Civil Service Rules established a property interest in Palm's probationary role. Applying California rules of statutory construction, the court concluded that the Charter and Civil Service Rules created no such property interest for Palm.

Within the Charter, a section provided that employees in the classified service – like Palm – could only be discharged "for cause," suggesting a potential property interest. However, another section of the Charter pertaining specifically to probationary employees stated that "[a]t or before the expiration of the probationary period, the appointing authority may terminate the probationary employee by delivering written notice of termination to the employee…" Critically, the latter section did not require that discharge be "for cause," and instead allowed LADWP to terminate probationary employment based only on a subjective finding that the employee demonstrated unsatisfactory performance. This language, the court held, cut sharply against a finding of a property interest in the probationary position.

Likewise, a provision in the Civil Service Rules defined "probationary period" as "the working test period during which an employee … may be terminated without right of appeal to the Board of Civil Service Commissioners." Moreover, under the Civil Service Rules, employees on probation for a promotional position were considered to be on a leave of absence from their former position, and employees who failed probation were to be returned to their former position.

Thus, the Ninth Circuit confirmed that Palm lacked a protected property interest in his probationary employment as a supervisor and upheld the dismissal of Palm's due process claim.

Palm v. Los Angeles Department of Water and Power (9th Cir. 2018) 889 F.3d 1081.

NOTE:

A public employer's own rules, ordinances, and/or charter provisions may establish (or preclude) a property interest in probationary employment. To effectuate your agency's preferences in this regard, we recommend auditing policies and procedures regularly.

WAGE AND HOUR

California Supreme Court Adopts "ABC Test" for Independent Contractor Status.

The California Supreme Court established a new, worker friendly test to determine whether a person should be classified as an independent contractor or employee. This test applies to California's Industrial Welfare Commission (IWC) Wage Orders which regulate wages, hours, and working conditions.

Under the new "ABC Test," a person qualifies as an independent contractor to whom the wage orders do not apply, only if the employer proves all three of the following:

A) that the person is free from the control and direction of the hirer/contracting agency in connection with the performance of the work, both under the contract terms and in fact;

B) that the person performs work that is outside the usual course of the hiring entity's business; and

C) that the person is customarily engaged in an independently established trade, occupation, or business of the same nature as the work performed for the hiring entity.

An employer who cannot establish all three factors must treat that person as an employee and not an independent contractor for purposes of the IWC Wage Orders.

Although public sector employers are not governed by most parts of IWC Wage Order number 4 (Professional, Technical, Clerical or Mechanical Occupations), public sector employees are entitled to the following benefits under the Wage Orders: to be paid minimum wage; receive split shift pay; and receive the benefits of the meals and lodging limitations. For public sector employers who provide public transportation services under IWC Wage Order number 9 (Transportation Industry), public sector employees are entitled to be paid minimum wage, split shift pay, receive the benefits of the meals and lodging limitations, and receive rest and meal breaks (in most instances).

Dynamex Operations West, Inc. v. Superior Court (2018) 4 Cal.5th 903.

NOTE:

Although this decision applies only to the IWC Wage Orders, there will undoubtedly be efforts to extend the ABC Test to other areas of California law, such as California's anti-discrimination and leave laws. As a result, now is a good time to review whether the persons your agency contracts with qualify as independent contractors under the ABC Test. LCW is available to assist agencies in that effort. A more in-depth discussion of the Dynamex decision is available here: https://www.calpublicagencylaboremploymentblog.com/wage-and-hour-2/california-supreme-court-adopts-new-abc-test-for-classification-of-independent-contractors-potential-risk-and-impact-on-public-agencies.

LCW is offering seminars on this topic as well in August. More information is available at www.lcwlegal.com/events-and-training.

AGENCY SHOP

Preparing for U.S. Supreme Court's* Janus *Decision on Fair Share Fees.

The U.S. Supreme Court is expected to soon issue a long-awaited decision in *Janus v. AFSCME.* The case will decide whether public sector bargaining unit employees can be required to pay "service" or "fair share" service fees under an agency shop arrangement as a condition of continued employment. In the meantime, there are some proactive steps agencies can take to prepare for a potential decision that invalidates an agency's authority to deduct agency shop service fees from employee wages.

1. Identify *Janus*' Potential Scope of Impact Upon Your Agency

Your agency can begin by reviewing its collective bargaining agreements to determine whether any provide for an agency shop arrangement. For those that do, review all relevant provisions, including those related to processing service fee deductions. Unions typically collect both union dues and service fees through wage deductions via the agency's Payroll Department. Agencies with agency shop arrangements will likely be required to make administrative changes to their payroll practices. So you should familiarize yourself with the amount, timing, and frequency of service fee deductions.

Your agency should be ready to both immediately implement any Court-mandated changes, if any, and notify and meet and confer with any impacted unions regarding negotiable impacts of the changes as soon as possible.

2. Identify Which Provisions May Be Subject to Effects Bargaining

After this initial review, you may find it helpful to create union-specific spreadsheets or tables identifying all relevant provisions in your collective bargaining agreements, particularly if your agency has different agency shop arrangements with different unions. If the Court rules that agency shops are unconstitutional, your agency should be prepared to bargain over any negotiable effects of the decision. In preparation for these negotiations, we recommend that you review the impacted collective bargaining agreements to familiarize yourself with any additional release time, union access, and employee orientation benefits.

Finally, you may also wish to review any management rights, zipper, reopener, and/or severability clauses to determine whether any of these provisions apply. In this way, you will be ready to take the actions necessary to amend or eliminate collective bargaining agreement provisions that are contrary to the anticipated *Janus* decision.

3. Identify Union Dues, Service Fee, and Religious or Conscientious Objector Payers

After identifying which unions have agency shop agreements, your agency should develop a spreadsheet identifying each union's service fee payers, and religious or conscientious objectors. This will be both the most labor intensive and absolutely critical element of your *Janus* preparation.

Janus will not directly impact union member employees because they are voluntarily paying union dues. However, if the Court rules that mandatory agency shops are unconstitutional, the decision will directly impact the agency's service fee payers and any bargaining unit members who have a religious objection and who must donate to a charitable organization in lieu of the service fee. Review the election

forms in each employee's personnel file or payroll records to determine which category each bargaining unit member falls within.

On *Janus*' effective date, your agency may be required to immediately cease all wage deductions from service payers and religious objectors. Therefore, once you identify your employee categories, you must work with the Payroll Department to establish an action plan if the decision invalidates those wage deductions.

4. Conclusion

Public agencies should take all advance steps within their control to plan for the immediate cessation of deductions for service and religious objector fees. They should also be prepared to immediately give notice to unions of their opportunity to engage in any necessary effects bargaining. LCW will publish more specific guidance after the Court issues its decision in *Janus*.

CONFLICTS OF INTEREST

Section 1090's Prohibition on Conflicts Of Interest Applies to Independent Contractors.

Karen Christiansen was employed as Director of Planning and Facilities for the Beverly Hills Unified School District. In 2006, Christiansen successfully lobbied District officials to modify her status from employee to independent consultant, and to enter into a three-year contract with her. Christiansen then formed Strategic Concepts, LLC, and assigned her District contract to the company.

Christensen's contract expressly capped her compensation at $170,000 per year, but the District compensated Strategic far more generously without alerting the District's Board of Education. Meanwhile, Christensen was simply doing the same work she had done as a District employee.

In Spring 2008, Christiansen persistently advocated for a new school bond issue. Christiansen also recommended that her contract be amended to include management of the project funded by the bond. The Board agreed to place the bond issue on the November 2008 ballot. It also approved Christiansen's contract amendment on a no-bid basis, directing an additional $16 million dollars to Strategic. Voters approved the bond measure, and between November 2008 and August 2009, Strategic collected more than $2 million in management fees even though no specific project had been approved.

Ultimately, a new Interim Superintendent became concerned about the amount of money being paid to Strategic without an approved project. The Board subsequently met to consider the matter with legal counsel, who advised that Strategic's contracts with the District were void based on Government Code section 1090's prohibition on conflicts of interest in public employment. The same day, Strategic was ordered to vacate the District's premises.

Christiansen and Strategic sued, seeking a declaration that the contracts were not void under section 1090. The trial court held that section 1090 did not apply to independent contractors, and thus the statute was not a valid basis to void the contracts. In turn, it ordered the District to pay Strategic $20,321,169.

The Court of Appeal reversed, holding that section 1090 could apply to independent contractors. It cited *People v. Superior Court (Sahlolbei) (2017) 3 Cal.5th 230*, which was pending when the trial court's ruling was issued. There, the California Supreme Court

concluded that the term "employees," as used in section 1090, "include[d] outside advisors with responsibilities for public contracting similar to those belonging to formal employees, notwithstanding the common law distinction between employees and independent contractors." The Supreme Court stated that if section 1090 exempted independent contractors, an official could manipulate the employment relationship to retain "official capacity" influence, yet avoid liability under section 1090.

And indeed, here, Christensen lobbied to move from employee to independent contractor status, causing her compensation to balloon while doing the same work, and then used her influence to obtain a $16 million no-bid contract.

Strategic Concepts, LLC v. Beverly Hills Unified School District (2018) 23 Cal.App.5th 163.

LCW IN THE NEWS

LCW Ranked a Best Law Firm for Women Attorneys.

In a national survey of law firms of comparable size, Liebert Cassidy Whitmore ranked as the third-best law firm for women. The survey, conducted by Law360, indicates that LCW is one of few law firms nationwide with an above-average representation of female attorneys, including at its top management tiers. More information is available at www.lcwlegal.com/news.

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LCW Webinar: Closing the Wage Gap: California and Federal Equal and Fair Pay Laws

Tuesday, July 24, 2018 | 10 AM - 11 AM

Although both California and Federal law now mandate "equal" and "fair pay" for all, many employers may not know exactly what those terms mean and what laws govern them. Intended as a broad introduction to this emerging area of the law, this presentation will address the nuts and bolts of both the Federal Equal Pay Act and the California Fair Pay Act – two overlapping but distinct laws that try to close the historic "wage gap" between men and women. The workshop will cover recent case developments, defenses to Equal Pay Act claims, and the extent to which equal pay laws apply to public sector employers.

Presented by:

T. Oliver Yee

Who Should Attend?

Managers, Supervisors, Department Heads, and Human Resources Staff.

Workshop Fee:

Consortium Members: $70, Non-Members: $100

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Los Angeles County Employees Retirement Association - LACERA | Pasadena | Lee T. Patajo

June 26,28 — **"Embracing Diversity"**
Los Angeles County Employees Retirement Association - LACERA | Pasadena | Christopher S. Frederick

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City of Rancho Cucamonga | Rancho Cucamonga | Kristi Recchia

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June 28 — **"Preventing Workplace Harassment, Discrimination and Retaliation"**
City of Torrance | James E. Oldendorph

July 10 — **"Progressive Discipline"**
City of Gardena | Kristi Recchia

July 12,25 — **"Preventing Workplace Harassment, Discrimination and Retaliation"**
City of Walnut Creek | Jack Hughes

July 18 — **"Performance Management"**
East Bay Regional Park District | Oakland | Erin Kunze

July 19 — **"File That! Best Practices for Documents and Record Management"**
City of Concord | Heather R. Coffman

July 24 — **"Labor Relations 101"**
City of Gardena | Kristi Recchia

Aug. 15 — **"Ethics in Public Service"**
City of Vallejo | Lisa S. Charbonneau

Aug. 28 — **"Legal Issues Regarding Hiring"**
City of Glendale | Mark Meyerhoff

Aug. 28 — **"Key Legal Principles for Public Safety Managers - POST Management Course"**
Peace Officer Standards and Training - POST | San Diego | Frances Rogers

Speaking Engagements

June 25 — **"Strategies to Manage Increasing Pension Costs"**
California Special Districts Association (CSDA) General Manager Leadership Summit | Olympic Valley | Steven M. Berliner

June 26 — **"Powerful Leadership: Effective Tips for Stellar General Managers"**
CSDA General Manager Leadership Summit | Olympic Valley | Gage C. Dungy

July 10	**"Defining Staff Board & Staff Roles and Relationships"** CSDA Special District Leadership Academy | Napa | Jack Hughes
July 11	**"Bullying, A Hostile Workplace, and Sexual Harassment"** International Public Management Association Central California Chapter (IMPA-CCC) Meeting | Merced | Che I. Johnson
July 25	**"Harassment Prevention"** CSDA District Network Workshop | Avila Beach | Shelline Bennett
Aug. 2	**"Webinar on Next Steps for Cities after *Janus v. AFSCME*"** League of Cities City Attorneys' Webinar | Webinar | Laura Kalty
Aug. 14	**"Avoiding Retaliation Claims"** Gallagher Seminar What Nonprofits Can Expect in 2018 | Oakland | Erin Kunze

Seminars/Webinars

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June 13,14	**"Best Practices for Conducting Fair and Legally Compliant Internal Affairs Investigations** Liebert Cassidy Whitmore | Fullerton | Geoffrey S. Sheldon & J. Scott Tiedemann
June 20	**"How to Avoid Claims of Disability Discrimination: The Road to Reasonable Accommodation"** Liebert Cassidy Whitmore | South San Francisco | Jennifer Rosner
June 26	**"Firefighter Discipline and Appeal Rights: How to Comply with the Bill of Rights"** Liebert Cassidy Whitmore | Webinar | Richard Bolanos
June 27	**"Life After Retirement - Hiring Retired Annuitants and Avoiding Violations"** Liebert Cassidy Whitmore | Webinar | Frances Rogers & Michael Youril
June 28	**"The Negotiable Aspects of Organizational Restructuring and Day-to-Day Labor Relations"** Liebert Cassidy Whitmore | Webinar | Jack Hughes
July 3	**"The Significant Impact of Janus v. AFSCME and S.B 866 on Public Sector Labor Relations** Liebert Cassidy Whitmore | Webinar | Che I. Johnson
July 12	**"Trends & Topics at the Table!"** Liebert Cassidy Whitmore | Fullerton | Kristi Recchia & Frances Rogers
July 19	**"Payroll Processing & Regular Rate of Pay Seminar"** Liebert Cassidy Whitmore Seminar | | Brian P. Walter & Jennifer Palagi
July 24	**"Closing the Wage Gap: California and Federal Equal and Fair Pay Laws"** Liebert Cassidy Whitmore | Webinar | T. Oliver Yee
Aug. 15	"Seminal PERB Cases and What They Mean for Your Agency's Labor Relations" Liebert Cassidy Whitmore | Webinar | Adrianna E. Guzman

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