



RECEIVED JUN 30 2021

STATE OF MINNESOTA
PUBLIC EMPLOYMENT RELATIONS BOARD
1380 Energy Lane, Suite #1, St. Paul, MN 55108-5253
www.mn.gov/perb; perb@state.mn.us; 651-539-1413

UNFAIR LABOR PRACTICE CHARGE

DO NOT WRITE IN THIS SPACE:

Case No: 21-4-029 Date Filed: 6/30/21

Dated served on Charged Party: 6/30/21

INSTRUCTIONS: To file an unfair labor practice charge, please complete this charge form in either a paper or electronic format. If more space is needed for any item on this form, attach additional sheets and number items. PLEASE BE ADVISED that this form and all the information contained in it is public under the Minnesota Government Data Practices Act.

1. IS THIS AN AMENDED CHARGE? YES IF SO, CASE NO. NO

2. CHARGING PARTY: EMPLOYEE EMPLOYEE ORGANIZATION EMPLOYER
EXCLUSIVE REPRESENTATIVE EMPLOYER ORGANIZATION OTHER

- a. Full name of charging party: St. Paul Federation of Educators
- b. Mailing address (Street, city, state, and ZIP code): 23 Empire Drive, St. Paul, MN 55103
- c. Telephone number: 651-222-7303
- d. Fax No. 651-222-8948
- e. E-mail address: abena@spfe28.org
- f. Representative, if any (e.g., attorney, union representative, human resource director):
Name and Title: Debra Corhouse, Attorney, Education Minnesota
Mailing address (if different from above): 41 Sherburne Avenue, St. Paul, MN 55103
Telephone number: 651-292-4823
E-mail address: debra.corhouse@edmn.org
Fax No.: 651-292-4843

3. CHARGE FILED AGAINST (mark only one): EMPLOYEE ORGANIZATION EMPLOYEE EMPLOYER

- a. Full name of Employee Organization, Employee, or Employer: St. Paul Public Schools
- b. Mailing address (Street, city, state, and ZIP code): 360 Colborne St., St. Paul, MN 55102
- c. Telephone number: 651-767-8100



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d. Charged party's representative, if any: (e.g., attorney, union representative, human resource director):

Name and title: Chuck Long

Mailing Address (if different from above):

Telephone number: 651-767-8137

E-mail address: charles.long@spps.org

Fax No.: _____

4. STATUTORY SECTIONS ALLEGEDLY VIOLATED (MINN. STAT. 179.11, 179.12 OR 179A.13)

a. Please provide the specific provision(s) that is alleged to have been violated.

Minnesota Statutes Section 179A.13, subd. 2 (1) and (3)

5. STATEMENT OF CHARGE

a. Provide a clear and concise statement of the conduct alleged to constitute an unfair labor practice including, where known, the dates, time, and place of each instance of charged party's conduct, and the name and capacity of each person involved. This must be a statement of the facts that support your claim and not conclusions of law. (Use and attach additional sheets of paper, if necessary.)

On June 10, Principal Lydia Kabaka met with teacher Zachary Pierson. During that meeting, she questioned him about the substance of discussions that had taken place at a union meeting that day. She also indicated that she was aware that he had made comments about administration at that meeting. On June 14, Ms. Kabaka gave Mr. Pierson a letter of directive regarding his communications with staff, among other things, and threatening discipline.

In the course of these communications, Ms. Kabaka gave the impression of surveillance, conducted actual surveillance, and threatened Mr. Pierson with further retaliation.



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6. REMEDY SOUGHT

a. Please provide a brief statement of the relief or remedy sought by the charging party.

The Union requests an order directing the District to withdraw the unlawful directive and to take measures necessary to ensure that administrators do not engage in further unlawful conduct.

7. DECLARATION

I have thoroughly read the above charge. The statements contained therein are true to the best of my knowledge and belief.

Debra M. Corhouse
(Type or Print Name)

Debra M. Corhouse
(Signature)

Title, if any: Staff Attorney

Date: June 30, 2021