



STATE OF HAWAII  
HAWAII LABOR RELATIONS BOARD  
Princess Keelikolani Building, 830 Punchbowl Street, Room 434, Honolulu, Hawaii 96813

**EMail: Aug 03 2018 03:51PM HAST**  
**Transaction ID 62308358**  
**Case No. 18-CE-007919**

## HLRB-4 PROHIBITED PRACTICE COMPLAINT

Case No. \_\_\_\_\_

File the original and five copies of this Complaint, by U.S. Mail or in person, with the Hawaii Labor Relations Board, Princess Keelikolani Building, 830 Punchbowl Street, Room 434, Honolulu, Hawaii 96813. If more space is required for any item, attach additional sheets, numbering each item accordingly.

1. The Complainant alleges that the following circumstances exist and requests that the Hawaii Labor Relations Board proceed pursuant to Hawaii Revised Statutes Sections 89-13 and 89-14, and its Administrative Rules, to determine whether there has been any violation of the Hawaii Revised Statutes, Chapter 89.

### 2. Complainant

(a) Name, address and telephone number.

University of Hawaii Professional Assembly  
1017 Palm Drive  
Honolulu, HI 96814  
(808) 593-2157

(b) Name, address and telephone number of the principal representative, if any, to whom correspondence is to be directed.

T. Anthony Gill, Esq.  
Gill, Zukeran & Sgan  
The Block: Richards Building  
707 Richards Street, Suite 100  
Honolulu, HI 96813  
(808) 523-6777  
tgill@gzsattorneys.com

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### 3. Respondent (Public Employer and/or Employee Organization or its Agents Against Whom Complaint is Filed)

(a) Name, address and telephone number.	
The Honorable David Y. Ige, Governor Executive Chambers, State Capitol 415 S Beretania St #5, Honolulu, Hawaii 96813 Ph: 586-0034	Roderick Becker, Comptroller, Kalanimoku Building 1151 Punchbowl Street, Honolulu, HI 96813 Ph: 586-0400
(b) Name, address and telephone number of the principal representative, if any, to whom correspondence is to be directed.	
Russell Suzuki, Esq., Attorney General 425 Queen Street, Honolulu, Hawaii 96813 Ph: 586-1500	James Halvorson, Esq., Deputy Attorney General 235 S. Beretania Street, 15th Floor, Honolulu, Hawaii 96813 Ph: 587-2900

### 4. Indicate the appropriate bargaining unit(s) of employee(s) involved.

Bargaining Unit (BU) - 07 University of Hawaii
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### 5. Allegations

The Complainant alleges that the above-named respondent(s) has (have) engaged in or is (are) engaging in a prohibited practice or practices within the meaning of the Hawaii Revised Statutes, Section 89-13. (Specify in detail the particular alleged violation, including the subsection or subsections of the Hawaii Revised Statutes, Section 89-13, alleged to have been violated, together with a complete statement of the facts supporting the complaint, including specific facts as to names, dates, times, and places involved in the acts alleged to be improper.)

(See attached)
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**6. Provide a clear and concise statement of any other relevant facts.**

(See attached)

STATE OF HAWAII                    )  
   )    ss.  
 CITY AND COUNTY OF            )

\_\_\_\_\_, being first duly sworn on oath, deposes and says: that \_\_\_\_\_ is the Petitioner above named, or \_\_\_\_\_ representative, and that \_\_\_\_\_ has read the above Petition consisting of this and \_\_\_\_\_ additional page(s), and is familiar with the facts alleged therein, which facts \_\_\_\_\_ knows to be true, except as to those matters alleged on information and belief, which matters \_\_\_\_\_ believes to be true.

\_\_\_\_\_  
 (Signature)

\_\_\_\_\_  
 (Title)

Subscribed and sworn to before me  
 this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_ .

\_\_\_\_\_  
 Notary Public, \_\_\_\_\_ Circuit  
 State of Hawaii

My Commission expires: \_\_\_\_\_