UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 31
11500 W OLYMPIC BLVD
SUITE 600
Los Angeles, CA 90064-1753

Agency Website: www.nlrb.gov
Telephone: (310)235-7351
Fax: (310)235-7420

November 13, 2026

Kirill Penteshin, Esq.
Schwartz, Steinsapir, Dohrmann & Sommers LLP
888 West 6th Street, 12th Floor
Los Angeles, CA 90017
kp@ssdslaw.com

Re: Cottage Health
Case 31-CA-399177

Dear Kirill Penteshin:

The charge that you filed in this case on November 12, 2026, has been docketed as case number 31-CA-399177. This charge has **not** yet been assigned to an investigator. This letter outlines the required information and evidence you initially need to provide, explains your right to be represented, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Required Information and Evidence: As the party who filed the charge in this case, it is your responsibility to present evidence in support of your allegations. Accordingly, please submit the following information to our office **using the Agency's e-filing system at www.nlrb.gov no later than close of business on Friday, November 27, 2026**.

- A chronological outline or timeline of the relevant sequence of events and exchanges (verbal and in person communications) related to the charge allegations. Include the names and titles of any involved Union and/or Employer representatives;

- Relevant documentation related to the allegations in the charge as well as supporting communications and documents such as letters, e-mails, text messages, phone records, etc.; and

- A list of the witnesses you intend to present, their contact information (e-mail and phone) and a brief summary of each witness's testimony.

This information must be returned to this office by Friday, November 27, 2026. Please e-file the information as "Evidence" and select "Charging Party" as the Participant Type when prompted. If the above information is not received by then, your charge may be subject to dismissal because of your failure to cooperate in the investigation. If the charge is dismissed, you will receive a dismissal letter. The charged party will also receive a copy of the dismissal letter.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, **www.nlrb.gov**, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Preservation of all Potential Evidence: Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

Prohibition on Recording Affidavit Interviews: If affidavits are taken in this case, please note it is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

Correspondence: All documents submitted to the Region regarding your case MUST be filed through the Agency's website, **www.nlrb.gov**. This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please email **R31-Investigation@nlrb.gov**. If you have emailed and not received a response, you may contact **Supervisory Investigator Dolores M. Alcantar**, whose telephone number is **(310)307-7321**. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. To ensure that you receive important case-related correspondence, **you must provide this office with your preferred email address.** These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact this office to discuss the circumstances that prevent you from using email.

Controlled Unclassified Information (CUI): This National Labor Relations Board (NLRB) proceeding may contain Controlled Unclassified Information (CUI). Subsequent information in this proceeding may also constitute CUI. National Archives and Records Administration (NARA) regulations

at 32 CFR Part 2002 apply to all executive branch agencies that designate or handle information that meets the standards for CUI.

* * *

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, **www.nlrb.gov** or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

/s/ Danielle M. Pierce

Danielle M. Pierce
Regional Director

cc: Genesis Diaz
SEIU Local 121RN
1040 Lincoln Avenue
Pasadena, CA 91103
diazg@seiu121rn.org

Copy of Charge only sent to:

Justin M. Crane, Attorney
Myers Law Group, APC
9327 Fairway View Place, Suite 100
Rancho Cucamonga, CA 91730

FORM NLRB-501
(10-24)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
31-CA-399177	11/12/2026

INSTRUCTIONS:
File an original 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
Cottage Health

b. Tel. No.
(805) 682-7111

c. Cell No.

f. Fax. No.

d. Address *(Street, city, state, and ZIP code)*
400 W Pueblo St.
Santa Barbara, CA 93105

e. Employer Representative
Cara Williams
Chief Human Resources Officer

g. e-mail
cwilliams@sbch.org

h. Number of workers employed
4,000

i. Type of Establishment *(factory, mine, wholesaler, etc.)*
Hospital

j. Identify principal product or service
Healthcare

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge *(set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)*
See Attachment A.

3. Full name of party filing charge *(if labor organization, give full name, including local name and number)*
SEIU Local 121 RN

4a. Address *(Street and number, city, state, and ZIP code)*
1040 Lincoln Ave
Pasadena, CA 91103

4b. Tel. No.
(626) 639-6200

4c. Cell No.

4d. Fax No.

4e. e-mail
diazg@seiu121rn.org

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 (SEIU)

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.

(signature of representative or person making charge)

Kirill Penteshin, Attorney
(Print/type name and title or office, if any)

Address 888 W. 6th St., 12th Floor, Los Angeles, CA 90017

Date Nov 12, 2026

Tel. No.
(323) 655-4700

Office, if any, Cell No.

Fax No.

e-mail
kp@ssdslaw.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 89 FR 24869 (April 9, 2024). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

ATTACHMENT A

2. Basis of the Charge

Within the last 6 months, the above-named Employer, by and through its agents and/or supervisors, has violated the Act by:

1) threatening to decrease employees' wages and benefits, including by withholding regular pay increases, if employees elect the Charging Party union as their collective bargaining representative;
2) soliciting employee grievances and promising to resolve such grievances, in response to employees' union support and protected concerted activity;
3) promising improved benefits to employees in response to employees' union support and protected concerted activity;
4) conditioning promised improved benefits on employees not electing the Charging Party union as their collective bargaining representative;
5) promulgating and maintaining facially overbroad work rules that prohibit employees from engaging in solicitation, distribution, and other protected concerted activities;
6) discriminatorily enforcing work rules against protected concerted union activities, including solicitation, distribution, and uniform rules;
7) implicitly surveilling, and threatening to interrogate and retaliate against employees, with respect to their union support and participation in protected concerted activity, by telling employees that the Employer will find out which employees signed union authorization cards and that the Employer will be approaching employees to interrogate them about whether they support the Charging Party union;
8) prohibiting employees from using their break time to speak with union representatives and requiring employees to remain on duty, contrary to the Employer's regular policy, for the purpose of preventing employees from engaging in union and protected concerted activity;
9) interrogating employees regarding protected concerted activity.