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16 Attorneys for Employer

17 Wonderful Nurseries LLC

18 STATE OF CALIFORNIA

19 AGRICULTURAL LABOR RELATIONS BOARD

20 IN THE MATTER OF:

Case No.: 2024-CE-013

21 WONDERFUL NURSERIES LLC,

2024-CE-014

2024-CE-015

22 Respondent,

23 and

24 UNITED FARMWORKERS OF
25 AMERICA,

**WONDERFUL NURSERIES LLC'S
ANSWER TO COMPLAINT**

26 Charging Party.

27 Wonderful Nurseries LLC ("Wonderful") hereby answer the allegations in the
28 Complaint as follows.

1 1. Wonderful admits, on information and belief, that the UFW filed charge 2024-
2 CE-013. Wonderful denies the remaining allegations in paragraph 1 in their entirety,
3 singularly and in combination.

4 2. Wonderful admits, on information and belief, that the UFW filed charge 2024-
5 CE-014. Wonderful denies the remaining allegations in paragraph 2 in their entirety,
6 singularly and in combination.

7 3. Wonderful admits, on information and belief, that the UFW filed charge 2024-
8 CE-015. Wonderful denies the remaining allegations in paragraph 3 in their entirety,
9 singularly and in combination.

10 4. Wonderful admits that the ALRB served it with the charges. Wonderful denies
11 the remaining allegations in paragraph 4 in their entirety, singularly and in combination.

12 5. Wonderful admits that it is an agricultural employer with farming operations
13 at various locations in Kern County. Wonderful denies the remaining allegations in
14 paragraph 5 in their entirety, singularly and in combination.

15 6. Wonderful admits that Guerrero Farm Labor provides it with workers.
16 Wonderful denies the remaining allegations in paragraph 6 in their entirety, singularly and in
17 combination.

18 7. Wonderful denies the allegations in paragraph 7 in their entirety, singularly
19 and in combination.

20 8. Wonderful admits that Brenda Chaidez-Sanchez is employed by Guerrero
21 Farm Labor. Wonderful denies the allegations in paragraph 8 in their entirety, singularly and
22 in combination.

23 9. Wonderful admits that it hired Raul Calvo as a labor consultant. Wonderful
24 denies the allegations in paragraph 9 in their entirety, singularly and in combination.

25 10. Wonderful admits that Maria Salamanca is an HR employee for Wonderful.
26 Wonderful denies the allegations in paragraph 10 in their entirety, singularly and in
27 combination.

28 11. Wonderful admits that Anna Saldivar is an agent for Wonderful. Wonderful

1 denies the allegations in paragraph 11 in their entirety, singularly and in combination.

2 12. Wonderful admits that Angie Carranza is an agent for Wonderful. Wonderful
3 denies the allegations in paragraph 12 in their entirety, singularly and in combination.

4 13. Wonderful admits that Monica Cervantes is an agent for Wonderful.
5 Wonderful denies the allegations in paragraph 13 in their entirety, singularly and in
6 combination.

7 14. Wonderful admits that Carina Maceira is an agent for Wonderful. Wonderful
8 denies the allegations in paragraph 14 in their entirety, singularly and in combination.

9 15. Wonderful admits that Liliana del Aguila is an agent for Wonderful.
10 Wonderful denies the allegations in paragraph 15 in their entirety, singularly and in
11 combination.

12 16. Wonderful admits that Yacqueline Aragon is an agent for Wonderful.
13 Wonderful denies the allegations in paragraph 16 in their entirety, singularly and in
14 combination.

15 17. Wonderful admits that Estefani Rodriguez is an attorney for Wonderful and
16 helped in preparing declarations from employees. Wonderful denies the allegations in
17 paragraph 17 in their entirety, singularly and in combination.

18 18. Wonderful admits that Sean Sullivan is an attorney for Wonderful. Wonderful
19 denies the allegations in paragraph 18 in their entirety, singularly and in combination.

20 19. Wonderful admits that Seth Mehrten is an attorney representing Wonderful.
21 Wonderful denies the allegations in paragraph 19 in their entirety, singularly and in
22 combination.

23 20. Wonderful admits that Jaqueline Hernandez (whose alleged name was
24 wrongly changed to “Rodriguez” later in the paragraph) was an agent for Wonderful.
25 Wonderful denies the allegations in paragraph 20 in their entirety, singularly and in
26 combination.

27 21. Wonderful lacks the information and belief to admit or deny the allegations in
28 paragraph 21 and on that basis denies the allegations in paragraph 21 in their entirety,

1 singularly and in combination.

2 22. Wonderful admits the allegations contained in paragraph 22.

3 23. Wonderful admits that it hired Raul Calvo as a labor consultant. Wonderful
4 denies the allegations in paragraph 23 in their entirety, singularly and in combination.

5 24. Wonderful lacks the information and belief to admit or deny the allegations in
6 paragraph 24 and on that basis denies the allegations in paragraph 24 in their entirety,
7 singularly and in combination.

8 25. Wonderful admits that there was a discussion about a script. Wonderful
9 denies the allegations in paragraph 25 in their entirety, singularly and in combination.

10 26. Wonderful admits that Raul Calvo met with employees. Wonderful denies the
11 allegations in paragraph 26 in their entirety, singularly and in combination.

12 27. Wonderful admits that Raul Calvo met with employees. Wonderful denies the
13 allegations in paragraph 27 in their entirety, singularly and in combination.

14 28. Wonderful denies the allegations in paragraph 28 in their entirety, singularly
15 and in combination.

16 29. Wonderful admits that Raul Calvo met with employees. Wonderful denies the
17 allegations in paragraph 29 in their entirety, singularly and in combination.

18 30. Wonderful lacks the information or belief necessary to admit or deny the
19 allegations in paragraph 30 and on that basis denies the allegations in paragraph 30 in their
20 entirety, singularly and in combination.

21 31. Wonderful admits that Raul Calvo read a script to employees. Wonderful
22 denies the allegations in paragraph 31 in their entirety, singularly and in combination.

23 32. Wonderful denies the allegations in paragraph 32 in their entirety, singularly
24 and in combination.

25 33. Wonderful denies the allegations in paragraph 33 in their entirety, singularly
26 and in combination.

27 34. Wonderful admits that Raul Calvo asked workers if they wanted assistance in
28 revoking their authorization. Wonderful denies the allegations in paragraph 34 in their

1 entirety, singularly and in combination.

2 35. Wonderful denies the allegations in paragraph 35 in their entirety, singularly
3 and in combination.

4 36. Wonderful denies the allegations in paragraph 36 in their entirety, singularly
5 and in combination.

6 37. Wonderful denies the allegations in paragraph 37 in their entirety, singularly
7 and in combination.

8 38. Wonderful denies the allegations in paragraph 38 in their entirety, singularly
9 and in combination.

10 39. Wonderful denies the allegations in paragraph 39 in their entirety, singularly
11 and in combination.

12 40. Wonderful lacks the information and belief necessary to admit or deny the
13 allegations and on that basis denies the allegations in paragraph 40 in their entirety,
14 singularly and in combination.

15 41. Wonderful denies the allegations in paragraph 41 in their entirety, singularly
16 and in combination.

17 42. Wonderful denies the allegations in paragraph 42 in their entirety, singularly
18 and in combination.

19 43. Wonderful admits that workers asked if they could find out if the UFW had
20 their signature. Wonderful denies the allegations in paragraph 43 in their entirety, singularly
21 and in combination.

22 44. Wonderful denies the allegations in paragraph 44 in their entirety, singularly
23 and in combination.

24 45. Wonderful lacks the information and belief necessary to admit or deny the
25 allegations and on that basis Wonderful denies the allegations in paragraph 45 in their
26 entirety, singularly and in combination.

27 46. Wonderful denies the allegations in paragraph 46 in their entirety, singularly
28 and in combination.

1 47. Wonderful denies the allegations in paragraph 47 in their entirety, singularly
2 and in combination.

3 48. Wonderful admits that Salamanca had meetings with workers during work
4 hours. Wonderful denies the allegations in paragraph 48 in their entirety, singularly and in
5 combination.

6 49. Wonderful lacks the information and belief necessary to admit or deny the
7 allegations and on that basis Wonderful denies the allegations in paragraph 49 in their
8 entirety, singularly and in combination.

9 50. Wonderful lacks the information and belief necessary to admit or deny the
10 allegations and on that basis Wonderful denies the allegations in paragraph 50 in their
11 entirety, singularly and in combination.

12 51. Wonderful lacks the information and belief necessary to admit or deny the
13 allegations and on that basis Wonderful denies the allegations in paragraph 51. in their
14 entirety, singularly and in combination.

15 52. Wonderful lacks the information and belief necessary to admit or deny the
16 allegations and on that basis Wonderful denies the allegations in paragraph 53 in their
17 entirety, singularly and in combination.

18 53. Wonderful lacks the information and belief necessary to admit or deny the
19 allegations and on that basis denies the allegations in paragraph 54 in their entirety,
20 singularly and in combination.

21 54. Wonderful lacks the information and belief necessary to admit or deny the
22 allegations and on that basis Wonderful denies the allegations in paragraph 54 in their
23 entirety, singularly and in combination.

24 55. Wonderful lacks the information and belief necessary to admit or deny the
25 allegations and on that basis Wonderful denies the allegations in paragraph 55 in their
26 entirety, singularly and in combination.

27 56. Wonderful admits that Saldivar held meetings with employees during work
28 hours. Wonderful denies the allegations in paragraph 56 in their entirety, singularly and in

1 combination.

2 57. Wonderful lacks the information and belief necessary to admit or deny the
3 allegations and on that basis Wonderful denies the allegations in paragraph 57 in their
4 entirety, singularly and in combination.

5 58. Wonderful lacks the information and belief necessary to admit or deny the
6 allegations and on that basis Wonderful denies the allegations in paragraph 58 in their
7 entirety, singularly and in combination.

8 59. Wonderful lacks the information and belief necessary to admit or deny the
9 allegations and on that basis Wonderful denies the allegations in paragraph 59 in their
10 entirety, singularly and in combination.

11 60. Wonderful lacks the information and belief necessary to admit or deny the
12 allegations and on that basis Wonderful denies the allegations in paragraph 60 in their
13 entirety, singularly and in combination.

14 61. Wonderful lacks the information and belief necessary to admit or deny the
15 allegations and on that basis Wonderful denies the allegations in paragraph 61 in their
16 entirety, singularly and in combination.

17 62. Wonderful lacks the information and belief necessary to admit or deny the
18 allegations and on that basis Wonderful denies the allegations in paragraph 62 in their
19 entirety, singularly and in combination.

20 63. Wonderful lacks the information and belief necessary to admit or deny the
21 allegations and on that basis Wonderful denies the allegations in paragraph 63 in their
22 entirety, singularly and in combination.

23 64. Wonderful lacks the information and belief necessary to admit or deny the
24 allegations and on that basis denies the allegations in paragraph 64 in their entirety,
25 singularly and in combination.

26 65. Wonderful lacks the information and belief necessary to admit or deny the
27 allegations and on that basis Wonderful denies the allegations in paragraph 65 in their
28 entirety, singularly and in combination.

1 66. Wonderful admits that Calvo held meetings. Wonderful denies the allegations
2 in paragraph 66 in their entirety, singularly and in combination.

3 67. Wonderful lacks the information and belief necessary to admit or deny the
4 allegations and on that basis Wonderful denies the allegations in paragraph 67 in their
5 entirety, singularly and in combination.

6 68. Wonderful lacks the information and belief necessary to admit or deny the
7 allegations and on that basis Wonderful denies the allegations in paragraph 68 in their
8 entirety, singularly and in combination.

9 69. Wonderful lacks the information and belief necessary to admit or deny the
10 allegations and on that basis Wonderful denies the allegations in paragraph 69 in their
11 entirety, singularly and in combination.

12 70. Wonderful lacks the information and belief necessary to admit or deny the
13 allegations and on that basis Wonderful denies the allegations in paragraph 70 in their
14 entirety, singularly and in combination.

15 71. Wonderful lacks the information and belief necessary to admit or deny the
16 allegations and on that basis Wonderful denies the allegations in paragraph 71 in their
17 entirety, singularly and in combination.

18 72. Wonderful lacks the information and belief necessary to admit or deny the
19 allegations and on that basis Wonderful denies the allegations in paragraph 72 in their
20 entirety, singularly and in combination.

21 73. Wonderful lacks the information and belief necessary to admit or deny the
22 allegations and on that basis Wonderful denies the allegations in paragraph 73 in their
23 entirety, singularly and in combination.

24 74. Wonderful lacks the information and belief necessary to admit or deny the
25 allegations and on that basis Wonderful denies the allegations in paragraph 74 in their
26 entirety, singularly and in combination.

27 75. Wonderful denies the allegations in paragraph 75 in their entirety, singularly
28 and in combination.

1 76. Wonderful lacks the information and belief necessary to admit or deny the
2 allegations and on that basis Wonderful denies the allegations in paragraph 76 in their
3 entirety, singularly and in combination.

4 77. Wonderful denies the allegations in paragraph 77 in their entirety, singularly
5 and in combination.

6 78. Wonderful denies the allegations in paragraph 78 in their entirety, singularly
7 and in combination.

8 79. Wonderful lacks the information and belief necessary to admit or deny the
9 allegations and on that basis Wonderful denies the allegations in paragraph 79 in their
10 entirety, singularly and in combination.

11 80. Wonderful denies the allegations in paragraph 80 in their entirety, singularly
12 and in combination.

13 81. Wonderful admits the allegations contained in paragraph 81.

14 82. The allegations contained in this paragraph as legal conclusions which do not
15 require a response, but Wonderful denies the allegations in paragraph 82 in their entirety,
16 singularly and in combination.

17 83. The allegations contained in this paragraph as legal conclusions which do not
18 require a response, but Wonderful denies the allegations in paragraph 83 in their entirety,
19 singularly and in combination.

20 84. The allegations contained in this paragraph as legal conclusions which do not
21 require a response, but Wonderful denies the allegations in paragraph 84 in their entirety,
22 singularly and in combination.


23 85. The allegations contained in this paragraph as legal conclusions which do not
24 require a response, but Wonderful denies the allegations in paragraph 85 in their entirety,
25 singularly and in combination.

26 86. The allegations contained in this paragraph as legal conclusions which do not
27 require a response, but Wonderful denies the allegations in paragraph 86 in their entirety,
28 singularly and in combination.

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Dated: May 2, 2024

Respectfully submitted,
BARSAMIAN & MOODY
A Professional Corporation

By: 
Seth G. Mehrten
Attorneys for Employer
Wonderful Nurseries LLC

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PROOF OF SERVICE

I, Seth Mehrten, declare as follows:

I am a citizen of the United States and a resident of the County of Fresno. I am over the age of eighteen years and not a party to the within entitled action. My business address is: 1141 West Shaw Avenue, Suite 104, Fresno, California 93711-3704.


On May 2, 2024, I served the within document(s) described as:

- **WONDERFUL NURSERIES LLC’S ANSWER TO COMPLAINT**

on each of the interested parties in this action, as addressed and by the method of service indicated below, and as stated on the attached service list.

- BY MAIL:** I am familiar with my employer’s practice for the collecting and processing of correspondence for mailing with the United States Postal Service. I served the foregoing document(s) by placing a true copy of the foregoing document(s) in a sealed envelope with postage thereon fully prepaid, with return receipt requested, in the United States mail, at Fresno, California.
- BY ELECTRONIC FILE:** I filed the foregoing document(s) by causing a true copy of the foregoing document(s) to be sent from e-mail address *SMehrten@TheEmployersLawFirm.com* to the e-mail address *Efile@ALRB.ca.gov*.
- BY EMAIL:** I served the foregoing document(s) by causing a true copy of the foregoing document(s) to be sent from email address *SMehrten@TheEmployersLaw Firm.com* to the person(s) at the email address(es) listed on the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on May 2, 2024, at Fresno, California.



Seth G. Mehrten

SERVICE LIST

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Via Electronic File:

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