



# UNIT CLARIFICATION PETITION

Case 141973-C-25

## PARTIES

<b>Employer:</b> Washington State University	<b>Petitioner:</b> Union
<b>Party 2:</b> WSU CASE / United Auto Workers Local 4591	<b>Petition Type:</b> Amendment of Certification
<b>Party 3:</b>	<b>Joint Request?:</b> No

## BARGAINING UNIT

**If a collective bargaining agreement (CBA) exists, most recent end date:** 08/15/2026

**Number of Employees in Question:** 1450

**Bargaining Unit Identification:** Academic student employees

## REPRESENTATIVES

Name, Title, and Organization	Contact Information	Representing
Alli Carlisle UAW Servicing Representative UAW	2633 Eastlake Ave E Seattle, Washington 206-604-1522 alli@uc-uaw.org	Union
Amy Bowles Attorney Douglas Drachler McKee & Gilbrough, LLP	1215 Fourth Ave, Ste. 1350 Seattle, Washington 206-623-0900 amyb@ddmglaw.com	Union
Kendra Hseih Director of Labor Relations Washington State University	PO Box 641014 Pullman, Washington 509-335-4522 kfonten@wsu.edu	Employer

## SUBMISSION & SERVICE

**Special requests related to case processing or reasonable accommodation:**

<b>Submitter Name:</b> Amy Bowles	<b>Submitter Email:</b> amyb@ddmglaw.com
<b>Submitter Title:</b> Attorney	<b>Date Submitted:</b> 01/24/2025 at 2:25 PM
<b>System Service:*</b> Yes	

*\*If yes, the submitter elected to use the system to serve the other parties.*

## **UAW Local 4591 UC Petition to amend certification 13591-A - Attachment A**

WSU CASE/ United Auto Workers Local 4591 and United Auto Workers Local 4121 hereby jointly request an order amending certification to reflect the change in name of the exclusive representative of the bargaining unit described in section 1 below.

### **Section 1: Description of Existing Bargaining Unit (as certified in DECISION 13591-A-PECB)**

All employees enrolled in academic programs and employed by the Washington State University in the following classifications: Graduate Teaching Assistant; Graduate Staff Assistant; Graduate Project Assistant; Graduate Veterinary Assistant; Graduate Research Assistant, and any other student employees whose duties and responsibilities are substantially equivalent to those employees in the described positions; excluding students who have incidental or no service expectancy imposed upon them by the employer, casual employees, confidential employees, supervisors, employees covered under chapter 41.76 RCW, employees included in any other bargaining unit, and all other employees.

### **Section 2: Former Name of Exclusive Representative (as certified in DECISION 13591-PECB)**

United Automobile, Aerospace, and Agricultural Implement Workers of America Local 4121

### **Section 3: Current Name of Exclusive Representative**

WSU CASE / UNITED AUTO WORKERS LOCAL 4591

### **Section 4: Description of Name Change for the Exclusive Bargaining Representative (Please see the Declarations of Acacia Patterson, David Parsons and Levin Kim for additional information in support of the Union's petition.)**

On February 3, 2024, the Union notified its members that a Local Union Amalgamation Vote would take place. The two options would be to amalgamate with UNITED AUTO WORKERS LOCAL 4121 or to charter a new local union with the UAW International.

From February 7 to February 9, 2024, a secret ballot election remained open.

A UAW staffer, not in the bargaining unit, counted ballots and the WSU-CASE Bargaining Committee notified bargaining unit members on February 13, 2024 that 88% of voters voted to charter a new local union.

The Union filed for a Local Union charter with the International Union, UAW, and on March 6, 2024 UAW voted in favor of the Local Union's request. The Union's name is United Auto Workers, Local 4591.

1  
2  
3 BEFORE THE STATE OF WASHINGTON  
4 PUBLIC EMPLOYMENT RELATIONS COMMISSION

5 In the matter of the petition of:

6 WSU CASE/INTERNATIONAL UNION,  
7 UNITED AUTOMOBILE, AEROSPACE  
8 AND AGRICULTURAL IMPLEMENT  
9 WORKERS OF AMERICA, LOCAL UNION  
10 4591

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

DECLARATION OF DAVID  
PARSONS

11 Involving Certain Employees of:

12 WASHINGTON STATE UNIVERSITY  
13

14  
15 DAVID PARSONS declares as follows:

16 1. I am over the age of 18, am competent to be a witness in this matter, and make the  
17 following declaration based upon my personal knowledge.

18 2. I am an International Representative with United Automobile, Aerospace and  
19 Agricultural Implement Workers of America (“UAW”). I have been a UAW International  
20 Representative since September, 2021. Prior to that I was President of UAW Local 4121  
21 between 2009 to 2021, and Financial Secretary of UAW Local 4121 between 2004 to 2009. I  
22 became involved with UAW and UAW Local 4121 in 2000 during the academic student  
23 employee organizing campaign while I was a Graduate Teaching Assistant at the University of  
24 Washington.  
25  
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27  
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DECLARATION OF DAVID PARSONS

1           3.       In my role as UAW International Representative, I support several UAW  
2 International locals in the Pacific Northwest and Alaska, including UAW Local 4121 and UAW  
3 Local 4591. I support employees in organizing campaigns, bargaining and internal governance  
4 matters, such as internal representation or affiliation decisions. I also work closely with the UAW  
5 International. In my role as UAW International Representative, I support regional UAW locals'  
6 consistency and compliance with the UAW constitution. The UAW constitution is the governing  
7 document that establishes the standards for any UAW local, including duties of officers, dues and  
8 dues processing, general grievance and appeals, internal processes, representation at the national  
9 convention, and election of executive board officers. I also make sure that current and new UAW  
10 locals have the information they need to govern within the UAW International.  
11

12  
13           4.       UAW International governs all UAW locals. Any local affiliated with UAW is  
14 governed by the UAW International constitution.  
15

16           5.       I have supported academic student employee organizing efforts at Washington  
17 State University (“WSU”) and was the primary UAW representative for the academic student  
18 employee representation petition at PERC. “WSU-CASE/UAW 4121” (Washington State  
19 University – Coalition of Student Employees/United Automobile Workers 4121”) filed the  
20 representation petition for a bargaining unit of academic student employees. WSU-CASE filed  
21 their PERC petition for representation at WSU on May 4, 2022.  
22

23           6.       Following a card check election PERC interim certified the WSU-CASE  
24 bargaining unit as “United Automobile, Aerospace, and Agricultural Implement Workers of  
25 America Local 4121” on November 9, 2022, and following resolution of WSU’s disputes with  
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1 hourly undergraduate employees, PERC issued an order of final certification on February 13,  
2 2024.

3  
4 7. PERC modified the bargaining unit slightly between the interim and final  
5 certification. The final certification does not include “Tutor, Reader and/or Grader in all  
6 academic units and tutoring centers”. The bargaining unit definition is:

7 All employees enrolled in academic programs and employed by the Washington State  
8 University in the following classifications: Graduate Teaching Assistant; Graduate Staff  
9 Assistant; Graduate Project Assistant; Graduate Veterinary Assistant; Graduate Research  
10 Assistant, and any other student employees whose duties and responsibilities are  
11 substantially equivalent to those employees in the described positions; excluding students  
12 who have incidental or no service expectancy imposed upon them by the employer,  
13 casual employees, confidential employees, supervisors, employees covered under chapter  
14 41.76 RCW, employees included in any other bargaining unit, and all other employees.

15 8. In addition to supporting WSU-CASE on their organizing efforts and  
16 representation petition at PERC, I also supported WSU-CASE with negotiating their initial  
17 collective bargaining agreement (“CBA”) with WSU.

18 9. Before negotiations began, members of the WSU-CASE bargaining unit  
19 democratically elected bargaining unit members to represent them at the negotiation table. UAW  
20 International governs and defines the election process for a bargaining unit’s initial CBA  
21 negotiation and the role of bargaining committee representatives. The elected bargaining unit  
22 member leaders made up the WSU-CASE Bargaining Team. Like other UAW units, their  
23 authority to negotiate with management and how they negotiate with management came from an  
24 agenda and bargaining demands approved by the bargaining unit.

25 10. WSU-CASE and WSU began negotiating the parties’ initial CBA on February 22,  
26 2023. The parties reached a tentative agreement on January 17, 2024, and the CBA ratification  
27  
28

1 vote was finalized on January 25, 2024. The CBA is effective from February 1, 2024 to August  
2 15, 2026. The CBA will remain in effect until August 15, 2026.

3  
4 11. I was heavily involved in negotiations for the initial CBA. I attended and  
5 participated in most bargaining sessions and supported the bargaining unit on proposals and  
6 negotiations with WSU.

7  
8 12. In addition to supporting WSU-CASE on their organizing petition and  
9 negotiations for their initial CBA, I also supported the WSU-CASE bargaining unit on their  
10 affiliation decision to form a new UAW International local, UAW Local 4591. In this capacity I  
11 educated WSU-CASE regarding their options, advised them on how to conduct an equitable  
12 bargaining-unit wide affiliation vote and how to provide all members an opportunity to  
13 participate and ask questions. I also worked with WSU-CASE on the mechanics of UAW  
14 International voting on WSU-CASE's request to affiliate a new local, Local 4591.

15  
16 13. I am aware that on February 3, 2024, the WSU-CASE Bargaining Committee  
17 emailed all academic student employees in the bargaining unit notice of a virtual membership  
18 meeting to be held February 6, 2024 on Zoom. The notice included a Zoom link to attend the  
19 meeting virtually. The meeting was to be held on Zoom to be accessible to all bargaining unit  
20 academic student employees across the WSU campuses and at off-campus locations. The notice  
21 identified that the primary purpose of the meeting was for the membership to discuss and ask  
22 questions about internal affiliation options for the academic student employee bargaining unit at  
23 WSU.

24  
25  
26 14. I am aware that on February 6, 2024, the WSU-CASE Bargaining Committee held  
27 the virtual membership meeting, open to all bargaining unit academic student employees, on  
28

DECLARATION OF DAVID PARSONS

1 Zoom. The primary purpose of the membership meeting was to discuss internal affiliation  
2 options for the academic student employee bargaining unit at WSU. Members had the  
3 opportunity to discuss two affiliation options: affiliation with a UAW International local or  
4 formation of their own UAW International local. The WSU-CASE Bargaining Committee made  
5 its recommendation. Internal affiliation decisions are a democratic process for UAW bargaining  
6 unit members. I did not attend this membership meeting.  
7

8  
9 15. To my knowledge, at the February 6, 2024 membership meeting the WSU-CASE  
10 Bargaining Committee notified members the vote for the full membership to elect affiliation with  
11 a local or formation of their own UAW local, would be held electronically via secret ballot from  
12 February 7, 2024 at 9:00 a.m. until February 9, 2024 at 5:00 p.m. This was consistent with my  
13 advice.  
14

15 16. To my knowledge, on February 7, 2024 the WSU-CASE Bargaining Committee  
16 emailed all academic student employees an electronic ballot for the affiliation choice. This email  
17 included a review of both options for affiliation, link to slides from the February 6, 2024  
18 membership meeting, and the WSU-CASE Bargaining Committee recommendation.  
19

20 17. All the information regarding the February 6, 2024 membership meeting, the  
21 affiliation options, and the affiliation vote was also available on the WSU-CASE website, and  
22 WSU-CASE's social media platforms, including Instagram.  
23

24 18. I am aware that the vote was open for over forty-eight (48) hours from February  
25 7, 2024, starting at 9:00 a.m. until February 9, 2024 closing at 5:00 p.m. The ballot was  
26 conducted via email and was a secret ballot. The ballot contained the two options for voters:  
27 affiliate with Local 4121 or create an amalgamated local, Local 4591, with UAW International.  
28

DECLARATION OF DAVID PARSONS



1 A committee of bargaining unit members designated by the elected bargaining committee  
2 conducted the electronic vote and a UAW staffer maintained the secrecy of the vote consistent  
3 with UAW International practice, including that no one in the WSU-CASE bargaining unit was  
4 able to see who voted and what they voted for.  
5

6 19. On February 13, 2024, the WSU-CASE Bargaining Committee announced in an  
7 email to the bargaining unit and on its social media platforms that WSU-CASE bargaining unit  
8 members voted in favor of forming their own local with UAW International. Eighty-eight percent  
9 of voters voted in favor of affiliation by forming a new local with UAW. Not a single member of  
10 the WSU CASE bargaining unit has questioned or raised any concern regarding the affiliation  
11 and representation process.  
12

13 20. In my role as a UAW International Representative, I am aware that the UAW  
14 International voted to accept the affiliation request for WSU-CASE to form its own local, Local  
15 4591. This vote occurred in March 2024 and the affiliation became effective on March 6, 2024.  
16

17 21. The scope of the WSU-CASE bargaining unit remains the same following the  
18 affiliation.  
19

20 22. I participated in negotiations on the WSU-CASE CBA "Article 2 – Recognition".  
21 The parties reached a tentative agreement on Article 2 on March 30, 2023. The parties agreed  
22 that WSU recognized the International UAW and its Local Union as exclusive bargaining  
23 representative for all academic student employees in the bargaining unit. As the CBA remains in  
24 effect after affiliation, there is no change in the scope in this recognition of the bargaining unit  
25 from WSU-CASE/UAW Local 4121 to WSU-CASE/UAW Local 4591.  
26  
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DECLARATION OF DAVID PARSONS

1           23. I also participated in negotiations on “Article 9 - Job Titles” which provides the  
2 job titles or classifications that academic student employees in the bargaining unit will be placed  
3 into. The parties reached a tentative agreement on Article 9 on December 14, 2023. Like  
4 PERC’s final certification, Article 9 does not include “tutor, reader and/or grader in all academic  
5 units and tutoring centers.” There will be no change in the scope of the bargaining unit from  
6 WSU-CASE/UAW 4121 to WSU-CASE/UAW Local 4591.  
7

8           24. In my role as a UAW International Representative, I am aware of the UAW’s  
9 constitution and governance. I am aware that UAW’s constitution governs all UAW locals,  
10 including their executive officers’ positions and responsibilities, procedure to create bylaws,  
11 internal elections, dues and fees structures, contract administration, and grievance processing.  
12 WSU-CASE bargaining unit members also have access to the same UAW International benefits  
13 post-affiliation that they did pre-affiliation, including the strike fund. All membership rights and  
14 duties, including eligibility for membership, qualification to hold office, the dues and fees  
15 structure, and right to participate and vote on decisions about all Local decisions continue  
16 post-affiliation.  
17

18           25. In my role supporting WSU-CASE on the organizing petition, negotiations for the  
19 initial CBA and the affiliation I have worked closely with the UAW Local 4121 staff and  
20 WSU-CASE bargaining unit leaders.  
21

22           26. I have worked closely with WSU academic student employee bargaining unit  
23 member leaders, including the WSU-CASE Bargaining Committee who were elected from the  
24 bargaining unit to lead the bargaining unit at the negotiations table. After the bargaining unit  
25 ratified its first CBA, many of them were WSU-CASE interim executive officers, and many of  
26  
27  
28

1 those who were elected leaders on the WSU CASE Bargaining Committee were elected to  
2 officer positions with UAW Local 4591, including Ray Bennett (Trustee), Adam Bozeman  
3 (Trustee), Acacia Patterson (Recording Secretary), Whitney Shervey (Vice President), and Yiren  
4 Guo (Sergeant-at-arms).

6 27. The WSU-CASE bargaining unit leadership under UAW Local 4591 will have the  
7 same role as those at UAW Local 4121 and other UAW International locals. This role includes to  
8 “ensure that all policies formulated by the membership are duly executed, and to represent  
9 members in bargaining and enforcing collective bargaining agreements.”

11 28. The WSU-CASE/UAW Local 4591 will continue to retain the same authority to  
12 select members to represent them on contract and grievance administration, as well as at any  
13 bargaining tables, to ratify or reject changes negotiated in the collective bargaining agreement,  
14 and to vote on whether to strike.

16 29. UAW Local 4121 did not collect dues for the WSU-CASE bargaining unit. The  
17 UAW International provides that locals will begin offering members the opportunity to join their  
18 union and have dues remitted after the first CBA is ratified. The CBA for the WSU-CASE  
19 bargaining unit was ratified on January 25, 2024. UAW International governs the dues structure  
20 for all its locals, including Local 4121 and Local 4591, consistently. The dues structure at Local  
21 4591 is consistent with Local 4121 per the UAW constitution.

23 30. UAW Local 4591 will continue to administer internal and external grievances per  
24 the same processes as governed by the UAW international and the CBA.

26 31. In a few years when the current CBA opens for the parties to negotiate a  
27 successor CBA, the WSU-CASE/UAW Local 4591 bargaining unit members will continue to  
28

1 retain control to determine proposed amendments to CBAs, select members to sit at their  
2 bargaining table, ratify or reject changes negotiated in the agreement, and vote on whether to  
3 strike.  
4

5 32. WSU CASE/UAW Local 4121 and WSU CASE/UAW Local 4591 are part of the  
6 same International, UAW. UAW Local 4591 is a newly affiliated local with the UAW  
7 International. The transfer of representation from UAW Local 4121 to UAW Local 4591 has  
8 been an internal union process. I am aware that this transfer of representation occurred on March  
9 6, 2024 the effective date of WSU-CASE's affiliation as UAW Local 4591.  
10

11 33. I am aware that UAW staff member Alli Carlisle has contacted WSU Labor  
12 Relations Officer Kendra Hsieh and discussed UAW Local 4591's petition with her. WSU does  
13 not object.  
14

15 34. The WSU-CASE initial CBA will remain in effect until August 15, 2026, the date  
16 the current CBA expires. WSU-CASE/UAW Local 4591 will honor the CBA in effect.

17 35. UAW Local 4121 and UAW Local 4591 are part of the same international, UAW.  
18  
19

20 I declare under penalty of perjury under the laws of the State of Washington that the  
21 foregoing is true and correct to the best of my knowledge.

22 SIGNED this 17th day of December, 2024.  
23  
24

25 

26 \_\_\_\_\_  
27 David Parsons,  
28 UAW International Representative

1  
2  
3 BEFORE THE STATE OF WASHINGTON  
4 PUBLIC EMPLOYMENT RELATIONS COMMISSION

5 In the matter of the petition of:

6 WSU CASE/INTERNATIONAL UNION,  
7 UNITED AUTOMOBILE, AEROSPACE  
8 AND AGRICULTURAL IMPLEMENT  
9 WORKERS OF AMERICA, LOCAL UNION  
10 4591

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

DECLARATION OF ACACIA  
PATTERSON

11 Involving Certain Employees of:

12 WASHINGTON STATE UNIVERSITY  
13

14  
15 ACACIA PATTERSON declares as follows:

16 1. I am over the age of 18, am competent to be a witness in this matter, and make the  
17 following declaration based upon my personal knowledge.

18 2. I am an academic student employee at Washington State University (“WSU”), and  
19 a member of the academic student employee bargaining unit. I am a Graduate Research  
20 Assistant with the School of Mechanical and Materials Engineering in the Collins Research  
21 Group. I have worked in the Collins Research Group since June 2021. I was also a Graduate  
22 Teaching Assistant with the School of Biological Sciences Fall 2021 - Fall 2022 and with the  
23 Department of Physics and Astronomy Spring 2023 . I recently received my M.S. in Physics at  
24 WSU. I am continuing my doctoral research in Materials Science and Engineering at the Collins  
25 Research Group.  
26  
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DECLARATION OF ACACIA PATTERSON

1           3.       I am the Recording Secretary for WSU CASE/United Automobile, Aerospace,  
2 and Agricultural Implement Workers of America (“UAW”) Local 4591. This is an elected  
3 position. I was elected to this position by the bargaining unit membership on May 7, 2024.  
4

5           4.       I am aware that WSU-CASE filed a petition for representation of a bargaining  
6 unit of academic student employees on May 4, 2022 and that after a card check election, the  
7 Public Employment Relations Commission (“PERC”) certified WSU CASE’s exclusive  
8 bargaining representative as UAW Local 4121 on November 4, 2022. I am aware of this because  
9 I was a member of the WSU-CASE organizing committee and elected bargaining committee  
10 member for WSU-CASE’s initial collective bargaining agreement (“CBA”).  
11

12           5.       Prior to being the Recording Secretary for UAW Local 4591 I was an active  
13 member leader in WSU-CASE. I was elected by our membership to serve on the bargaining team  
14 for our initial CBA with WSU. I was an active and regular member of the bargaining team and  
15 participated in negotiations. I drafted proposals, counter proposals and internal guidelines,  
16 presented proposals during negotiation sessions, and took session notes. I was also active in  
17 WSU-CASE’s organizing campaign prior to and during the PERC representation process.  
18

19           6.       As an active member leader in WSU-CASE, I was also involved with the  
20 bargaining unit’s affiliation vote and process. This affiliation vote and process occurred in  
21 February 2024 and resulted in WSU CASE affiliating with UAW as Local 4591 in March 2024.  
22 This occurred prior to my election as Recording Secretary for UAW Local 4591.  
23

24           7.       I am aware that on February 3, 2024, the WSU-CASE Bargaining and Organizing  
25 Committees emailed all academic student employees in the bargaining unit notice of a virtual  
26 membership meeting to be held February 6, 2024 on Zoom. . The notice included an RSVP to  
27  
28

DECLARATION OF ACACIA PATTERSON

1 attend the meeting virtually. The meeting was to be held on Zoom to be accessible to all  
2 bargaining unit academic student employees across the WSU campuses and at off-campus  
3 locations. The notice identified that the primary purpose of the meeting was for the membership  
4 to discuss and ask questions about internal affiliation options for the academic student employee  
5 bargaining unit at WSU, and an election to choose how to affiliate.  
6

7 8. The affiliation election offered two options. The two options were (a)  
8 WSU-CASE creating or chartering its own UAW local with the International; or (b) WSU-CASE  
9 continuing with UAW Local 4121.  
10

11 9. On February 6, 2024, the WSU CASE Bargaining and Organizing Committees  
12 held the virtual membership meeting, open to all bargaining unit academic student employees, on  
13 Zoom. The primary purpose of the membership meeting was to discuss internal affiliation  
14 options for the academic student employee bargaining unit at WSU. Members had the  
15 opportunity to discuss the two-affiliation options and ask questions about the process.  
16

17 10. As a member leader on the Bargaining and Organizing Committee, I presented at  
18 the February 6, 2024, membership meeting with other WSU CASE member leaders. We used  
19 slides to present pros and cons of both affiliation election options, made our affiliation election  
20 recommendation to the membership, led discussion and Q&A on the affiliation elections options,  
21 and announced the details of the affiliation election vote, including that it would be a secret,  
22 electronic ballot and that it started on February 7, 2024 at 9:00 a.m. and closed on February 9,  
23 2024 at 5:00 p.m.  
24

25 11. I am aware that internal affiliation decisions are a democratic process for UAW  
26 bargaining unit members.  
27  
28

DECLARATION OF ACACIA PATTERSON

1           12.     On February 7, 2024, the WSU-CASE Bargaining and Organizing Committees  
2 emailed all academic student employees an electronic ballot for the affiliation choice. This email  
3 included a link to slides from the February 6, 2024 membership meeting with the options for  
4 affiliation, and the WSU-CASE Bargaining and Organizing Committee recommendation for the  
5 affiliation vote.  
6

7           13.     All the information regarding the February 6, 2024 membership meeting, the  
8 affiliation options, and the affiliation vote was also available on the WSU-CASE website, and  
9 WSU-CASE's social media platform, including Instagram.  
10

11           14.     The vote was open for over forty-eight (48) hours from February 7, 2024 at 9:00  
12 a.m. to February 9, 2024 at 5:00 p.m. The election was secret. A UAW staffer, not in the  
13 bargaining unit, processed the election so that no one in the WSU-CASE bargaining unit was  
14 able to see who voted and what they voted for.  
15

16           15.     On February 13, 2024, after receiving the results of the secret ballot election from  
17 the UAW staffer, the WSU CASE Bargaining and Organizing Committees announced via an  
18 email to the bargaining unit and on the WSU CASE website that the bargaining unit voted in  
19 favor of forming a new local with UAW International. I am aware that no members have raised  
20 any questions or concerns with the process after the election.  
21

22           16.     I am aware that the WSU CASE affiliation with UAW as Local 4591 became  
23 official on March 6, 2024. .  
24

25           17.     WSU CASE/UAW Local 4121 and WSU CASE/UAW Local 4591 are part of the  
26 same International UAW. WSU CASE's affiliated union is UAW Local 4591.  
27  
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DECLARATION OF ACACIA PATTERSON



1           18.     WSU-CASE/UAW Local 4591 held elections for Executive Officer positions  
2 from May 1, 2024 to May 3, 2024. I ran for the position of Recording Secretary and was elected  
3 to this position. I was sworn in on May 7, 2024. There was a runoff election for president held  
4 May 6, 2024 to May 7, 2024.

6           19.     There is a significant cross-over in the leadership between WSU CASE/UAW  
7 Local 4121 and our bargaining unit's newly affiliated union UAW Local 4591. In addition to  
8 myself, Ray Bennett (Trustee), Adam Bozeman (Trustee), Whitney Shervey (Vice President),  
9 Yiran Guo (Sergeant-at-arms), were elected member leaders of the WSU-CASE members of the  
10 bargaining committee prior to affiliation with UAW as Local 4591. Other members elected to  
11 Local 4591 executive officer and trustee leadership positions were de facto members of the  
12 WSU-CASE bargaining committee and played an active role in leadership at bargaining,  
13 ratification, and affiliation.

16           20.     When I was a Bargaining Committee member my position and responsibilities  
17 were governed by UAW. UAW International also governs my position and responsibilities as the  
18 UAW Local 4591 Recording Secretary.

21           21.     I participated in collective bargaining with WSU-CASE prior to affiliation and I  
22 will continue to participate in collective bargaining when we begin negotiating our successor  
23 CBA in a few years

24           22.     I am aware that members of UAW Local 4591 will continue to administer  
25 grievances per the same internal procedures and the CBA, elect members to represent them in  
26 bargaining our successor agreement in 2026, vote on whether to strike, and retain the same

28  
DECLARATION OF ACACIA PATTERSON

1 control to determine proposed amendments to CBAs while negotiating that successor CBA. Our  
2 internal grievance and collective bargaining practices are governed by UAW International.

3  
4 23. I am aware that the scope of the bargaining unit remains unchanged since WSU  
5 CASE affiliated with UAW Local 4591. It continues to consist of academic student employees,  
6 like myself.

7  
8 24. As a member of the bargaining team and elected leader of UAW Local 4591, I am  
9 also aware that the CBA will remain in effect and Local 4591 will be honoring the CBA with  
10 WSU. The CBA ratification became effective on January 25, 2024, and the CBA is effective  
11 from February 1, 2024 to August 15, 2026.

12 I declare under penalty of perjury under the laws of the State of Washington that the  
13 foregoing is true and correct to the best of my knowledge.

14  
15 SIGNED this 3rd day of July, 2024.

16  
17  
18 

19 Acacia Patterson,  
20 Recording Secretary, UAW Local 4591

1  
2  
3 BEFORE THE STATE OF WASHINGTON  
4 PUBLIC EMPLOYMENT RELATIONS COMMISSION

5 In the matter of the petition of:

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7 UNITED AUTOMOBILE, AEROSPACE  
8 AND AGRICULTURAL IMPLEMENT  
9 WORKERS OF AMERICA, LOCAL UNION  
10 4591

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

DECLARATION OF LEVIN KIM

11 Involving Certain Employees of:

12 WASHINGTON STATE UNIVERSITY  
13  
14

15 LEVIN KIM declares as follows:

16 1. I am over the age of 18, am competent to be a witness in this matter, and make the  
17 following declaration based upon my personal knowledge.

18 2. I am President of United Automobile, Aerospace and Agricultural Implement  
19 Workers of America, Local Union 4121 (“UAW Local 4121”). I have been President since  
20 January 2023. Prior to being elected as President I was the Vice President, elected in spring  
21 2022.

22 3. I am aware that a bargaining unit of academic student employees at Washington  
23 State University (“WSU”) filed a petition for representation at PERC on May 4, 2022, and that  
24 following a card check election PERC interim certified UAW Local 4121 as the employees’  
25 exclusive bargaining representative on November 4, 2022. I am further aware that PERC issued a  
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27  
28

DECLARATION OF LEVIN KIM

1 final certification of the WSU-CASE/UAW bargaining unit on February 13, 2024. I was not  
2 President of UAW Local 4121 at the time PERC issued the interim certification but was  
3 President at the time PERC issued the final certification.  
4

5 4. I am aware that following the interim certification on November 4, 2022, the  
6 parties met for the first bargaining session of their initial collective bargaining agreement  
7 (“CBA”) on February 22, 2023, that the ratification vote was effective on January 25, 2024, and  
8 the CBA is effective from February 1, 2024 to August 15, 2026.  
9

10 5. In my role as President of UAW Local 4121 I supported WSU-CASE by advising  
11 on questions related to organizing and bargaining, and sharing information and resources from  
12 previous organizing and contract campaigns that UAW Local 4121 was involved in.  
13

14 6. UAW Local 4121 is affiliated with UAW International.

15 7. I am aware that the WSU-CASE bargaining unit voted to affiliate with UAW  
16 Local 4591, a new UAW International affiliated local.

17 8. I am aware that UAW International voted in favor of WSU-CASE’s request to  
18 affiliate with Local 4591.  
19

20 9. UAW Local 4121 joins UAW Local 4591 in its petition to amend the certification  
21 to identify the exclusive bargaining representative for WSU-CASE as WSU-CASE/UAW Local  
22 4591 and will continue to support Local 4591 by coordinating on campaigns to address shared  
23 issues and sharing relevant information and resources about Local union operations.  
24

25  
26 I declare under penalty of perjury under the laws of the State of Washington that the  
27 foregoing is true and correct to the best of my knowledge.  
28

DECLARATION OF LEVIN KIM

SIGNED this 22nd of November, 2024.



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Levin Kim  
UAW Local 4121, President

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DECLARATION OF LEVIN KIM