September 2, 2008

James A Zeveski, CLA Department of Veterans Affairs 1 Jefferson Barracks Drive Building 25 St. Louis, MO 63125-4194

Re: <u>AFGE Local 96 and DVA (In re C)</u> <u>Request for Information</u>

Dear Mr. Zeveski:

Pursuant to 5 USC Section 7114(b)(4), AFGE Local 96 (Union) hereby serves this request for information. The Union requests responsive information by the close of business on September 5, 2008, as the arbitration is scheduled for next week. Please convey the response via facsimile or overnight mail to the undersigned.

The Union requires the information requested in this correspondence to allow us to provide adequate and effective representation for the above captioned arbitration for further investigation this matter and to prepare the case for arbitration. This information is required to determine if the agency had sufficient justification to propose the instant discipline and also to evaluate the *Douglas* factors.

INFORMATION REQUESTED

- 1. All documents collected by the Agency regarding the incident on July 23, 2007, that gave rise to the instant discipline, including but not limited to statements written by RN Singer, RN Green, LPN Brickey, NA Miller, and Mr. William Singleton.
- 2. All documents, minutes, and notes regarding management's decision to issue new SOP EMS 137-18 effective July 30, 2007.
- 3. Grievant Patrick C's OPF.
- 4. Any documents reflecting discipline, if any, for Patrick C not already contained in the OPF.

Additionally, if you would be so kind as to let me know the location of the arbitration hearing and what time it is set to begin, I would greatly appreciate it.

Thank you for your cooperation in this matter.

Sincerely,

Gony F. Goldberg, Assistant General Counsel 202-639-6424

cc: Glen Czarnecki

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of September, 2008, a copy of this Request for Information was sent via facsimile to James Zeveski at 314-845-5033.

Gony F. Goldberg, AGC