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**Via email**

CSEA Local 830  
400 County Seat Drive  
Mineola, New York 11501  
Attn: President Ron Gurrieri and Local 830 Executive Officers

Mr. Gurrieri et al.,

I am/was a CSEA member in good standing. I was employed as a Seasonal employee in the Parks Department during the COVID-19 pandemic. I read our Collective Bargaining Agreement(CBA<sup>1</sup>) and I know what benefits seasonal workers should be entitled to.

I request to file a grievance for the following:

1. Violation of §26 of the CBA regarding shift differential—I have never received shift differential pay even though this section applies to all employees.
2. Violation of §27 of the CBA regarding Holidays and Holiday pay—I have never been paid for a holiday or received holiday pay when requested to work on a holiday even though this section applies to all employees.
3. Violation of §31 of the CBA regarding Meal Money—I have never been paid meal money when I work an additional 2 hours beyond my regular shift, even though this section applies to all employees.
4. Violation of §38 of the CBA regarding health, dental, and optic plans—I have never received any of the health benefits described in this section, even though this section applies to all employees.
5. Violation of §59 of the CBA regarding a universal grace period—I have never been afforded the benefit of a grace period, even though this section applies to all employees.
6. Violation of the Fair Labor Standards Act (FLSA) . The FLSA requires employers pay employees from punch to punch, Nassau County engages in unlawful timekeeping practices.
7. Violation of Section 198c of the New York State Labor Law for failure to pay or let me use paid time off that I accrued during the COVID-19 Pandemic. Nassau County HR software shows that I have a balance of 2203.28 hours. At my current wage that has a monetary value of \$45,167.24.

Due to the size and complexity of my grievance, I request that Local 830 retain outside counsel to handle my case.

Finally, given that the issues raised above affect all Nassau County seasonal workers, I hereby demand the Unit President bring a class action grievance on behalf of me and all similarly situated victims.

Sincerely,

*Nicholas S Nugent*

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<sup>1</sup> Collective Bargaining Agreement between County of Nassau and the Civil Service Employees Assoc., Inc. Local 1000 effective January 1, 2008