1233 Shelburne Rd., Suite C-4 South Burlington, VT 05403 Tel: (802) 865-0095 E-mail: normblaislaw@gmail.com

September 28, 2021

Timothy Belcher, Esq, VSEA General Counsel 155 State Street Montpelier, VT 05602

Re: Chittenden County Sheriff's Department/ Voluntary Recognition

Dear Tim,

I represent the Chittenden County Sheriff's Department, and in that capacity am returning to you the "Request for Voluntary Recognition" which has been signed by Sheriff McLaughlin.

I want to stress, as the sheriff has indicated to you and Steve Howard, that the position of "transport deputy" is an unusual amalgamation of county and state control over those deputies. Indeed, the issue of financial compensation (which is often the most critical issue in contract negotiations) is one which is essentially beyond the sheriff's "legal control as employer".

With that caveat, the sheriff looks forward to working with the bargaining unit.

Thank you for your attention to this letter.

Sincerely,

Norman R. Blais, Esq.

Nrb/dab

Cc: Kevin McLaughlin, Sheriff (via email)(with enclosure)



Vermont State Employees' Association

155 State Street, Montpelier, VT 05602; Fax: (802) 223-4035 E-mail: vsea@vsea.org Phone: (802) 223-5247 Website: www.vsea.org

September 27, 2021

BY ELECTRONIC MAIL

Sheriff Kevin McLaughlin Chittenden County Sheriff's Department 70 Ethan Allen Drive South Burlington, VT 05403

Re: Request for Voluntary Recognition

Dear Sheriff McLaughlin:

Enclosed please find membership applications completed and signed by the six State Transport Deputies employed by the Chittenden County Sheriff's Department. Pursuant to the authorization set forth in those forms, please accept this letter as a request from the Vermont State Employees' Association that you voluntarily recognize it as the exclusive bargaining agent for a bargaining unit consisting solely of State Transport Deputies employed by your department, pursuant to 21 V.S.A. § 1723. The proposed unit is appropriate pursuant to *In re Election Petitions*, 2017 Vt. 7. VSEA requests recognition for the purpose of bargaining over those negotiable matters that are within your legal control as employer.

If you agree, please either sign below of send me a response by separate letter. VSEA looks forward working with you to address these employees' concerns.

Very Truly Yours,

Timothy Belcher, Esq. VSEA General Counsel

Encl.

I voluntarily recognize the Vermont State Employees' Association as the exclusive bargaining agent for a bargaining unit of State Transport Deputies employed by the Chittenden County Sheriff's Department, to negotiate over those matters within my control as employer.

Sheriff Kevin McLaughlin

Date