

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT

a. Name Service Employees International Union, Local 105		b. Union Representative to contact Juan Montana, Director	
c. Address (Street, city, state, and ZIP code) 14707 E. 2nd Ave. Aurora, CO 80011		d. Tel. No. (303) 727-8048	e. Cell No.
		f. Fax No.	
		g. e-mail JMontana@seiu105.org	

h. The above-named labor organization has engaged in and is engaging in unfair labor practices within the meaning of section 8(b), subsections (1) and (list subsections) (A) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)
Within the past six months, the above-named labor organization has failed and/or refused to process grievances on behalf of the undersigned employee.

3. Name of Employer ISS Facility Services, Inc.	4a. Tel. No. (303) 342-6966	b. Cell No.	c. Fax No. (303) 342-6967
	d. e-mail		

5. Location of plant involved (street, city, state and ZIP code) 8400 Pena Blvd., P.O. Box 492036 Denver, CO 80294	6. Employer representative to contact Anthony Boucher, Sr. Labor Relations
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7. Type of establishment (factory, mine, wholesaler, etc.) Airport	8. Identify principal product or service Janitorial services	9. Number of workers employed 500+
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10. Full name of party filing charge
(b) (6), (b) (7)(C)

11. Address of party filing charge (street, city, state and ZIP code) (b) (6), (b) (7)(C)	11a. Tel. No.	b. Cell No. (b) (6), (b) (7)(C)	c. Fax No.
	d. e-mail		

12. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No.
(b) (6), (b) (7)(C) <i>(Signature of representative or person making charge)</i>	(b) (6), (b) (7)(C) <i>(Print/type name and title or office, if any)</i>	Cell No. (b) (6), (b) (7)(C)
		Fax No.
Address (b) (6), (b) (7)(C) (b)	Date 12-3-18	e-mail

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case 27-CB-232018	Date Filed 12-3-2018

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name local 105 seiu		b. Union Representative to contact Ron Ruggiero Title:	
c. Address (Street, city, state, and ZIP code) 2525 w alameda ave CO denver 80219-____		d. Tel. No. (303) 698-7963	e. Cell No.
		f. Fax No.	g. e-Mail ruggiero@seiu105.org
h. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) <u>(1)(A)</u> _____ of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--			
3. Name of Employer Various Employers		4a. Tel. No.	b. Cell No.
		c. Fax No.	d. e-Mail
5. Location of plant involved (street, city, state and ZIP code)		6. Employer representative to contact Title:	
7. Type of establishment (factory, mine, wholesaler, etc.) Others	8. Identify principal product or service cleaning services	9. Number of workers employed 450	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	b. Cell No.
		c. Fax No.	d. e-Mail (b) (6), (b) (7)(C)
11. Address of party filing charge (street, city, state and ZIP code.) (b) (6), (b) (7)(C)			
12. DECLARATION		Tel. No. (b) (6), (b) (7)(C)	
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.		Cell No.	
By (b) (6), (b) (7)(C) _____ (b) (6), (b) (7)(C) _____ (signature of representative or person making charge) (Print/type name and title or office, if any)		Fax No.	
Title:		e-Mail (b) (6), (b) (7)(C)	
Address (b) (6), (b) (7)(C) _____ (date) 12/3/2018 13 32:27			

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Basis of the Charge

8(b)(1)(A)

Within the previous six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by refusing to process the Charging Party's grievance for arbitrary or discriminatory reasons or in bad faith.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case 27-CB-232057	Date Filed 12/3/2018

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name United Food and Commercial Workers, Local 7		b. Union Representative to contact Randy Tiffey Title: Union Representative	
c. Address (Street, city, state, and ZIP code) 7760 West 38th Avenue, Suite 400 CO Wheat Ridge 80033-____		d. Tel. No. (303) 425-0897	e. Cell No.
		f. Fax No. (303) 424-2416	g. e-Mail rktiffey@ufcw7.com
h. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) <u>(3)</u> of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--			
3. Name of Employer King Soopers Inc.		4a. Tel. No. (303) 778-3269	b. Cell No.
		c. Fax No.	d. e-Mail fred.woodward@kingsoopers.com
5. Location of plant involved (street, city, state and ZIP code) 65 Tejon Street CO Denver 80223-____		6. Employer representative to contact Fred Woodward Title: Division Associate Relations/Total Rewards Manager	
7. Type of establishment (factory, mine, wholesaler, etc.) Retail (Grocery)	8. Identify principal product or service Grocery Store	9. Number of workers employed 6	
10. Full name of party filing charge Fred Woodward King Soopers Inc.		11a. Tel. No. (303) 778-3269	b. Cell No.
		c. Fax No.	d. e-Mail fred.woodward@kingsoopers.com
11. Address of party filing charge (street, city, state and ZIP code.) 65 Tejon Street CO Denver 80223-			
12. DECLARATION		Tel. No. (303) 299-8218	
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.		Cell No.	
By <u>Patrick R. Scully</u> <u>Patrick R Scully Esq.</u> (signature of representative or person making charge) (Print/type name and title or office, if any)		Fax No. (303) 298-0940	
633 17th Street, Suite 3000 Address <u>Denver CO 80202-____</u> (date) <u>12/3/2018 16 35:27</u>		e-Mail pscully@shermanhoward.com	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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8(b)(3)

Within the previous six months, the above-named labor organization has failed and refused to bargain in good faith with the employer.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case 27-CB-232064	Date Filed 12-3-2018

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name APWU		b. Union Representative to contact Mark Dimondstein Title:	
c. Address (Street, city, state, and ZIP code) 1300 L Street NW DC Washington 20005-_____		d. Tel. No. (202) 842-4250	e. Cell No.
		f. Fax No.	g. e-Mail
h. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) <u>(1)(A)</u> _____ of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--			
3. Name of Employer USPS		4a. Tel. No. (202) 268-2608	b. Cell No.
		c. Fax No.	d. e-Mail megan.j.brennan@usps.gov
5. Location of plant involved (street, city, state and ZIP code) 475 L'Enfant Plaza SW DC Washington 20260-_____		6. Employer representative to contact Megan Brennan Title: Postmaster General	
7. Type of establishment (factory, mine, wholesaler, etc.) Services	8. Identify principal product or service USPS	9. Number of workers employed 250	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	b. Cell No.
		c. Fax No.	d. e-Mail (b) (6), (b) (7)(C)
11. Address of party filing charge (street, city, state and ZIP code.) (b) (6), (b) (7)(C)			
12. DECLARATION I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.		Tel. No. (b) (6), (b) (7)(C)	
By <u>(b) (6), (b) (7)(C)</u> _____ <u>(b) (6), (b) (7)(C)</u> _____ (signature of representative or person making charge) (Print/type name and title or office, if any)		Cell No.	
Title: (b) (6), (b) (7)(C)		Fax No.	
Address _____ (date) 12/3/2018 20 06:24		e-Mail (b) (6), (b) (7)(C)	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Basis of the Charge

8(b)(1)(A)

Within the previous six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening to retaliate against employees if they did not join or support the union.

Name of the Union Agent/Representative who made the threat	Date the threats were made
(b) (6), (b) (7)(C)	2/3/2018

8(b)(1)(A)

Within the previous six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by refusing to process the Charging Party's grievance for arbitrary or discriminatory reasons or in bad faith.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case 27-CB-232262	Date Filed 12-6-2018

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name SEIU Local 105		b. Union Representative to contact Edith Mata	
c. Address (Street, city, state, and ZIP code) 2525 W. Alameda Ave. Denver, CO 80219		d. Tel. No. 720276-1919	e. Cell No.
		f. Fax No.	
		g. e-mail	
h. The above-named labor organization has engaged in and is engaging in unfair labor practices within the meaning of section 8(b), subsections (1) and (list subsections) (A) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) The Union has failed to represent me or a file a grievance concerning the Employer refusing to pay me for vacation leave.			
3. Name of Employer Sierra Cleaning Service		4a. Tel. No.	b. Cell No.
		c. Fax No.	
		d. e-mail	
5. Location of plant involved (street, city, state and ZIP code) 1395 S. Sheridan Lakewood, CO 80232		6. Employer representative to contact Jeff Morton	
7. Type of establishment (factory, mine, wholesaler, etc.) Janitorial	8. Identify principal product or service Cleaning	9. Number of workers employed	
10. Full name of party filing charge (b) (6), (b) (7)(C)			
11. Address of party filing charge (street, city, state and ZIP code) (b) (6), (b) (7)(C)		11a. Tel. No.	b. Cell No. (b) (6), (b) (7)(C)
		c. Fax No.	
		d. e-mail	
12. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.			Tel. No.
(b) (6), (b) (7)(C) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) individual <small>(Print/type name and title or office, if any)</small>			Cell No. (b) (6), (b) (7)(C)
Address (b) (6), (b) (7)(C)			Fax No.
Date 12 6 18			e-mail

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

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UNITED STATES OF AMERICA		DO NOT WRITE IN THIS SPACE	
NATIONAL LABOR RELATIONS BOARD		Case	Date filed
FIRST AMENDED CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS		27-CB-232836	12/28/2018
INSTRUCTIONS: File an original of this charge with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.			
1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name American Postal Workers Union		b. Union Representative to Contact Rick Wehling Treasurer	
c. Address 3555 W. 3100 S., West Valley City, UT 84119-2519		d. Tel. No. (801)966-5803	e.e. Cell No.
		f. Fax No.	g. e-Mail (b) (6), (b) (7)(C)
h. The above-named labor organization or its agents have engaged in and are engaging in unfair labor practices within the meaning of section 8(b)(1)(A) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)			
Within the previous six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by settling the Charging Party's (b) (6), (b) (7)(C) 2018 removal grievance without backpay for arbitrary or discriminatory reasons or in bad faith.			
3. Name of Employer United States Postal Service		4a. Tel. No. 801-973-5501	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 1275 S. 4800 W., Salt Lake City, UT 84104-4440		6. Employer representative to contact	
7. Type of Establishment (factory, mine, wholesaler) Postal Service	8. Principal product or service Mail Delivery	9. Number of Workers employed 1000+	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	11b. Cell No.
		11c. Fax No.	11d e-Mail (b) (6), (b) (7)(C)
11. Address of party filing charge (street, city, state, and ZIP code) (b) (6), (b) (7)(C)			
12. DECLARATION			
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.			
By: (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)		(b) (6), (b) (7)(C)	Tel No. (b) (6), (b) (7)(C)
(signature of representative or person making charge)		Print/type name and title or office, if any	Cell No.
Address: (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)		Date: 12/28/2018	Fax No.
			e-Mail (b) (6), (b) (7)(C)

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

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UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case 27-CB-232836	Date Filed 12-17-2018

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name American Postal Workers Union		b. Union Representative to contact Rick Wehling Title: Treasurer	
c. Address (Street, city, state, and ZIP code) 3555 W 3100 S UT West Valley City 84119-2519		d. Tel. No. (801) 966-5803	e. Cell No.
		f. Fax No.	g. e-Mail (b) (6), (b) (7)(C)
h. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) <u>(3), (1)(A)</u> of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) --See additional page--			
3. Name of Employer United States Postal Service		4a. Tel. No. (801) 973-5501	b. Cell No.
		c. Fax No.	d. e-Mail
5. Location of plant involved (street, city, state and ZIP code) 1275 S 4800 W UT Salt Lake City 84104-4440			6. Employer representative to contact Title:
7. Type of establishment (factory, mine, wholesaler, etc.) Others	8. Identify principal product or service U.S. Mail Delivery	9. Number of workers employed 1000	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	b. Cell No.
		c. Fax No.	d. e-Mail (b) (6), (b) (7)(C)
11. Address of party filing charge (street, city, state and ZIP code.) (b) (6), (b) (7)(C)			
12. DECLARATION		Tel. No. (b) (6), (b) (7)(C)	
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.			
By (b) (6), (b) (7)(C)		(b) (6), (b) (7)(C)	
(signature of representative or person making charge)		(Print/type name and title or office, if any)	
		Title:	
(b) (6), (b) (7)(C)		Fax No.	
Address		e-Mail (b) (6), (b) (7)(C)	
		(date) 12/17/2018 07:25:59	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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Basis of the Charge

8(b)(1)(A)

Within the previous six months, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by refusing to process the Charging Party's grievance for arbitrary or discriminatory reasons or in bad faith.

8(b)(3)

Within the previous six months, the above-named labor organization has failed and refused to bargain in good faith with the employer.

UNITED STATES OF AMERICA		DO NOT WRITE IN THIS SPACE	
NATIONAL LABOR RELATIONS BOARD		Case	Date filed
CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS			
INSTRUCTIONS: File an original of this charge with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.			
1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name Brotherhood of Teamsters Local 455		b. Union Representative to Contact Alan Frisbee Secretary	
c. Address 10 Lakeside Ln, Ste 3A, Denver, CO 80212-7430		d. Tel. No. (303)458-1600	e.e. Cell No.
		f. Fax No.	g. e-Mail
h. The above-named labor organization or its agents have engaged in and are engaging in unfair labor practices within the meaning of section 8(b), subsection (1)(A) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Since about (b) (6), (b) (7)(C) 2018, the above-named labor organization has restrained and coerced employees in the exercise of rights protected by Section 7 of the Act by processing the grievance of (b) (6), (b) (7)(C) regarding (b) (6), (b) (7)(C) discharge on about (b) (6), (b) (7)(C) 2018 in a (b) (6), (b) (7)(C) discriminatory fashion or in bad faith.			
3. Name of Employer United Parcel Service		4a. Tel. No.	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 5020 Ivy St, Commerce City, CO 80022-4403		6. Employer representative to contact	
7. Type of Establishment (factory, mine, wholesaler) Warehouse	8. Principal product or service Parcel Delivery	9. Number of Workers employed 200+	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	11b. Cell No. (b) (6), (b) (7)(C)
		11c. Fax No.	11d. e-Mail
11. Address of party filing charge (street, city, state, and ZIP code) (b) (6), (b) (7)(C)			
12. DECLARATION			
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.			
By: (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)		Tel No.	
(signature of representative or person making charge)		(b) (6), (b) (7)(C), An Individual	(b) (6), (b) (7)(C)
		Print/type name and title or office, if any	Cell No. (b) (6), (b) (7)(C)
Address: (b) (6), (b) (7)(C)		Date: 12.17.18	Fax No.
			e-Mail

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes. (b) (6), (b) (7)(C)

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name Teamsters Local 17		b. Union Representative to contact Duane C. Grove	
c. Address (Street, city, state, and ZIP code) 7010 Broadway, Suite 200 Denver, CO 80221-2921		d. Tel. No. 303-433-6496	e. Cell No.
		f. Fax No.	g. e-Mail
h. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) <u>(1)(A)</u> of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See ATTACHMENT 1			
3. Name of Employer UPS Freight Inc.		4a. Tel. No. 866-694-2179	b. Cell No.
		c. Fax No.	d. e-Mail
5. Location of plant involved (street, city, state and ZIP code) 5300 E. 56th Ave Commerce City, CO 80022			6. Employer representative to contact Rafael/Service Center Mgr.
7. Type of establishment (factory, mine, wholesaler, etc.) Business	8. Identify principal product or service Pick-Up Deliver Freight	9. Number of workers employed 150	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	b. Cell No.
		c. Fax No.	d. e-Mail
11. Address of party filing charge (street, city, state and ZIP code.) (b) (6), (b) (7)(C)			
12. DECLARATION I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief. By <u>John C. Scully</u> John C. Scully, Attorney (signature of representative or person making charge) (Print/type name and title or office, if any)		Tel. No. 703-321-8510	Cell No.
		Fax No. 703-321-9319	e-Mail
National Right to Work Legal Defense Foundation Address <u>8001 Braddock Rd., Suite 600, Springfield, VA 22160</u> (date) <u>12/11/18</u>			

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PRIVACY ACT STATEMENT

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ATTACHMENT 1

1. Charging Party, (b) (6), (b) (7)(C) is employed by UPS Freight Inc. in Commerce City, Colorado, in a bargaining unit represented by Respondent Teamsters Local 17 ("Union").
2. On or about October 20, 2018, Charging Party resigned from the Union and objected to paying any dues or fees beyond what (b) (6) could lawfully be compelled to pay as (b) (6) pro-rata share of the cost of collective, bargaining, contract administration and grievance adjustment.
3. On or about November 5, 2018 Respondent Union provided a breakdown of what it claimed where the expenditures it claimed it could charge the Charging Party.
4. Union members are allowed to use employer check-off to pay dues. The Union unlawfully violated its duty of fair representation by prohibiting Charging Party and similarly situated fee payors from utilizing employer check-off but requiring them to pay by other means.
5. Respondent unlawfully failed to provide a breakdown or an audit of the chargeable expenditures of the affiliates including the International that receive agency fees from Charging Party and similarly situated discriminatees.
6. Respondent failed to provide an audit of the breakdown of its own chargeable and non-chargeable expenditures.
7. Respondent unlawfully charged for 100% of its overhead, Union Administration and Overhead instead of allocating those expenditures into chargeable/non-chargeable expenditures.
8. The Union unlawfully charged 100% for "direct taxes".
9. The Union failed to allocate for organizing expenditures.
10. The action of Respondent Union as described in paragraphs 4, 5, 6, 7, 8, and 9 restrain and coerce the Charging Party and other bargaining unit employees in the exercise of Charging Party's Section 7 rights to refrain from collective activity and violates Section (b)(1)(A) of the Act and the unions' duty of fair representation and fair dealing.