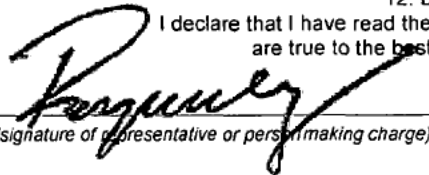


UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS

DO NOT WRITE IN THIS SPACE	
Case 27-CB-237412	Date Filed 3/11/2019

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 & UFCW International Union AFL-CIO		b. Union Representative to contact Kim C. Cordova	
c. Address (Street, city, state, and ZIP code) 7760 West 38th Avenue, Suite 400 Wheat Ridge, Colorado 80033-9982		d. Tel. No. 303-425-0897	e. Cell No.
		f. Fax No. 303-424-2416	
		g. e-mail kcordova@ufcw7.com	
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) (3) 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)			
Since on about (b) (6), (b) (7)(C) 2019, the UFCW Local 7 and the UFCW International Union have refused and failed to bargain in good faith with the employer and have engaged in a pattern of conduct to frustrate and prevent the negotiation of a new collective bargaining agreement covering certain King Soopers retail grocery stores. See Attachment A. King Soopers seeks immediate Section 10(j) relief.			
3. Name of Employer Dillon Companies, Inc. d/b/a King Soopers		4a. Tel. No. 303-765-5001	b. Cell No.
		c. Fax No.	
		d. e-mail fred.woodward@kingsoopers.com	
5. Location of plant involved (street, city, state and ZIP code) Retail grocery stores with units represented by UFCW Local 7 in the metropolitan area of Denver, Colorado.		6. Employer representative to contact Outside legal counsel (see below)	
7. Type of establishment (factory, mine, wholesaler, etc.) Retail Grocery Store	8. Identify principal product or service Retail Food Products	9. Number of workers employed	
10. Full name of party filing charge Dillon Companies, Inc. d/b/a King Soopers			
11. Address of party filing charge (street, city, state and ZIP code) 90 S. Cascade Ave. Suite 1500, Colorado Springs, CO 80903		11a. Tel. No. 719-448-4016	b. Cell No.
		c. Fax No. 719-635-4576	
		d. e-mail rdeeny@shermanhoward.com	
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. 719-448-4016	
 (Signature of representative or person making charge)		Cell No.	
Raymond M. Deeny (Print/type name and title or office, if any)		Fax No. 719-635-4576	
90 S. Cascade Ave. St. 1500, Colorado Springs, CO Address 80903		e-mail rdeeny@shermanhoward.com	
Date 3/11/2019			

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.

ATTACHMENT A

Since on about February 20, 2019, the UFCW Local 7 and the UFCW International Union (collectively “the Union”) have violated Section 8(b)(1) and (3) of the Act by refusing and failing to bargain in good faith, delaying meaningful discussions, and by engaging in a pattern of conduct designed to frustrate and prevent the negotiation of a new collective bargaining agreement covering certain King Soopers retail grocery stores.

The Union’s unlawful conduct includes but is not limited to the following:

- The Union refused to meet and negotiate at reasonable times and places. On February 25, 2019, King Soopers offered to meet and negotiate every day for the remainder of the week and any time. The Union refused.
- In doing so, the Union lied and/or misrepresented facts. The Union stated that it could not meet on February 27 or 28 because its (b) (6), (b) (7)(C) was not available and attending trust fund meetings on those dates. That was false. (b) (6), (b) (7)(C) did not attend the trust fund meetings on either day.
- The Union has made and insisted on unreasonable contract proposals that it knew would be unacceptable to King Soopers in an attempt to delay and frustrate bargaining.
- On March 8, the Union refused to meet or bargain again. The parties agreed to meet for negotiations on March 7 and again on March 8, 2019 until 1:00 p.m. After negotiations on March 7 concluded around 11:00 a.m., King Soopers informed the Union that the employer would break and resume negotiations at 6:00 a.m. the following morning, or earlier if the Union desired. But the Union refused to bargain on March 8, 2019 and falsely claimed that King Soopers had walked out on negotiations. King Soopers remained ready, willing, and available to negotiate from 6:00 a.m. through 2:00 p.m. on March 8.
- The Union has made willfully false and/or misleading statements about contract negotiations and King Soopers’ proposals throughout bargaining, including but not limited to the following:

The Union’s Misrepresentation	The Facts
The company’s proposals will result in “no pay raises over the next three years for around half of their associates.”	Under the employer proposals, most King Soopers/City Market associates would receive a pay increase. Top-rated associates would receive a (b) (4) per year increase (b) (4) over 3-years); associates in wage progressions will receive a minimum of (b) (4) (an increase over the current contract) with each step (every six months or a minimum of (b) (4) a year). Courtesy clerks are entry level positions and receive pay increases when promoted to other job classifications.

<p>The company's proposals will result in "decreased benefits and increased costs for health care."</p>	<p><u>Health Insurance:</u> King Soopers/City Market has proposed to increase its contributions to health care to ensure, according to its financial consultants, that all associates will have no increased costs and no change in their plan design during the 3-year contract.</p> <p><u>Pension:</u> King Soopers/City Market has proposed to increase contributions to ensure that the pension plan remains financially healthy throughout the term of this agreement, putting no one's retirement benefits at risk.</p>
<p>The company's proposals will result in "fewer full-time jobs and fewer hours for part time workers and more 'gig economy' jobs that don't support families in stores."</p>	<p>King Soopers/City Market has put forth no proposals to modify any language related to the use of full-time or part-time associates. The company has no plans to reduce full time or part-time associates. The company did propose a new position - a flex-position. Individuals holding the flex position will have the opportunity to bid on those hours <u>not</u> taken by full-time and part-time associates.</p>
<p>The company's proposals will result in "reduced income for more than 10,000 Colorado seniors."</p>	<p>King Soopers/City Market's proposals protect the health of the retirement plan through increased contributions by the company. The company has made no proposals about retirees or concerning retiree benefits.</p>

- These false and misleading statements were coercive of associate Section 7 rights, were intended to frustrate and interfere with King Soopers good faith efforts to reach a new agreement, and had their desired impact.
- The Union engaged in regressive bargaining on March 7 by adding proposals not previously included or fairly contained in its prior comprehensive counter offer without good cause and without any explanation.
- The Union continues to condition bargaining on legally permissive topics. The Union has refused to bargain unless King Soopers agreed to negotiate in an auditorium-style venue and with the participation of members who are not part of the Union's negotiations committee. This unlawful insistence has undermined, frustrated, and tainted the bargaining process.
- Immediate Section 10(j) relief is appropriate. The Union's bad faith bargaining poses a real danger of creating industrial unrest. *See NLRB Section 10(j) Manual Section 2.1.* The Union's bad faith conduct has been calculated to delay and frustrate any meaningful

negotiations with a strike vote likely to be taken in support of the Union's unlawful and improper bargaining tactics and positions. The contract is expired and a work stoppage would have significant detrimental impact on employees who have been misled by the Union, on the public, and on 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-237447	Date Filed 3/11/2019

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 INTERNATIONAL BROTHERHOOD OF TEAMSTERS	b. Union Representative to contact Javes Hoffa, President	
c. Address (Street, city, state, and ZIP code) 25 Louisiana Ave., N.W. Washington, DC 20001	d. Tel. No. 202-624-6800	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) (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 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 John G. Scully John G. Scully, Attorney
(signature of representative or person making charge) (Print/type name and title or office, if any)

National Right to Work Legal Defense Foundation
Address 8001 Braddock Rd., Suite 600, Springfield, VA 22160 (date) 3/8/19

Tel. No. 703-321-8510
Cell No.
Fax No. 703-321-9319
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.

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 Teamsters Local 17 ("Local Union"). Teamsters Local 17 is affiliated with Joint Council of Teamsters No. 3 ("Council") and the International Brotherhood of Teamsters ("International Union").
2. On or about **(b) (6), (b) (7)(C)**, 2018, Charging Party resigned from the Unions and objected to paying any dues or fees beyond what **(b) (6)** could lawfully be compelled to pay as **(b) (6), (b) (7)(C)** pro-rata share of the cost of collective, bargaining, contract administration and grievance adjustment.
3. On or about December 12, 2018, Charging Party filed an unfair labor practice charge against Local 17 (27-CB-232854).
4. Or about March 2, 2018, Local 17 provided the International Union's and Council's breakdown of chargeable/ non-chargeable fees.
5. The March 2 disclosure by the International failed to include a verification of the breakdown by an independent audit.
6. The International unlawfully charged for 100% of its organizing expenses, affiliate subsidies, and the Teamster affiliate pension plan.
7. The actions of Respondent International as described in paragraphs 5 and 6, and restrained and coerced the Charging Party and other bargaining unit employees in the exercise of their Section 7 rights to refrain from collective activity and violates Section (b)(1)(A) of the Act and violated the union's duty of fair representation and fair dealing.

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD		DO NOT WRITE IN THIS SPACE	
CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS		Case 27-CB-237452	Date filed 3/11/2019
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 United Union of Roofers, Waterproofers, and Allied Workers Local 58		b. Union Representative to Contact Isaac Hernandez Business Agent	
c. Address 404 N. Spruce, Colorado Springs, CO 80905		d. Tel. No. (719)205-7582	e.e. Cell No.
		f. Fax No.	g. e-Mail unionroofers58@gmail.com
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(s) (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 at least the last 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 allow intermediate journeymen to be evaluated to journeyman status, for discriminatory reasons or in bad faith.			
3. Name of Employer Central States Roofing		4a. Tel. No. 719-570-1774	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 5925 Omaha Blvd, Colorado Springs, CO 80916		6. Employer representative to contact Bill Haushidt Owner	
7. Type of Establishment (factory, mine, wholesaler) Roofing contract	8. Principal product or service Roofing	9. Number of Workers employed 125	
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 The statements therein are true to the best of my knowledge and belief.			
(b) (6), (b) (7)(C)		Tel No.	
(b) (6), (b) (7)(C) Individual		(b) (6), (b) (7)(C)	
Print/type name and title or office, if any		Cell No.	
(b) (6), (b) (7)(C)		Fax No.	
Date: 3-11-19		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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(b) (6), (b) (7)(C)

UNITED STATES OF AMERICA NATIONAL LABOR RELATIONS BOARD		DO NOT WRITE IN THIS SPACE	
CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS		Case	Date filed
		27-CB-237453	3/11/2019
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 United Union of Roofers Waterproofers and Allied Workers Local 58	b. Union Representative to Contact Isaac Hernandez Business Agent		
c. Address 404 North Spruce, Colorado Springs, CO 80905	d. Tel. No.	e.e. Cell No. (719)205-7582	
	f. Fax No.	g. e-Mail unionroofers58@gmail.com	
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(s) (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) 2019 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 grievance of (b) (6), (b) (7)(C) regarding (b) (6), (b) (7)(C) termination for arbitrary or discriminatory reasons or in bad faith.			
3. Name of Employer Central States Roofing		4a. Tel. No. 719-570-1774	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 5925 Omaha Blvd, Colorado Springs, CO 80915		6. Employer representative to contact Bill Haushidt Owner	
7. Type of Establishment (factory, mine, wholesaler) Roofing contractor	8. Principal product or service Roof		9. Number of Workers employed 125
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.			
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C), Individual		Tel No.
	Print/type name and title or office, if any		Cell No. (b) (6), (b) (7)(C)
Address: (b) (6), (b) (7)(C)		Date: 3/11/2019	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		DO NOT WRITE IN THIS SPACE	
NATIONAL LABOR RELATIONS BOARD		Case	Date filed
CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS		27-CB-237457	3/11/2019
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 Amalgamated Transit Union Local 1001		b. Union Representative to Contact Julio Rivera President	
c. Address 3315 W. 72nd Ave, Westminster, CO 80030		d. Tel. No. (303)412-1001	e.e. Cell No.
		f. Fax No. (303)412-1597	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(s) (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 past 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 grievances of the undersigned employee concerning suspension and other discipline (points) [REDACTED] has received.			
3. Name of Employer RTD		4a. Tel. No.	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 2701 S. Elati St., Englewood, CO 80110		6. Employer representative to contact Gary Schaeffer Plant Manager	
7. Type of Establishment (factory, mine, wholesaler) Rail yard	8. Principal product or service Train services	9. Number of Workers employed 300	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No.	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.			
B (b) (6), (b) (7)(C)		(b) (6), (b) (7)(C)	Tel. No. (b) (6), (b) (7)(C)
(Signature of representative or person making charge)		Printtype name and title or office, if any	Cell No. (b) (6), (b) (7)(C)
Address: (b) (6), (b) (7)(C)		Date: 3-11-2019	Fax No.
			e-Mail

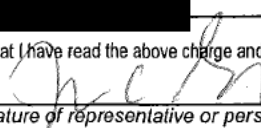
WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT

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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-237560	Date Filed 3/11/2019

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, JOINT COUNCIL 3		b. Union Representative to contact Steve Vairma, President	
c. Address (Street, city, state, and ZIP code) 10 Lakeside Lane, Suite 2E Denver, CO 80212		d. Tel. No.	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) (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 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.		Tel. No. 703-321-8510	
By <u></u> John C. Scully, Attorney (signature of representative or person making charge) (Print/type name and title or office, if any)		Cell No.	
National Right to Work Legal Defense Foundation		Fax No. 703-321-9319	
Address 8001 Braddock Rd., Suite 600, Springfield, VA 22160 (date) 3/8/19		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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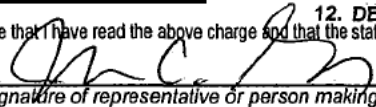
ATTACHMENT 1

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 ("Local Union"). Teamsters Local 17 is affiliated with Joint Council of Teamsters No. 3 ("Council") and the International Brotherhood of Teamsters ("International Union").
2. On or about (b) (6), (b) (7)(C) 2018, Charging Party resigned from the Unions and objected to paying any dues or fees beyond what (b) (6), (b) (7)(C) could lawfully be compelled to pay as (b) (6), (b) (7)(C) pro-rata share of the cost of collective, bargaining, contract administration and grievance adjustment.
3. On or about December 12, 2018, Charging Party filed an unfair labor practice charge against Local 17 (27-CB-232854).
4. On or about March 2, 2018, Respondent Local 17 Union provided the International Union's and Council's breakdown of the chargeable/non-chargeable fees.
5. The March 2 disclosure for the Council failed to include a verification of the breakdown by an independent audit.
6. The Council unlawfully failed to allocate its overhead, administration, benefits and taxes.
7. The Council failed to allocate for any organizing.
8. The actions of Respondent Council as described in paragraph 5, 6, and 7 restrained and coerced the Charging Party and other bargaining unit employees in the exercise of their Section 7 rights to refrain from collective activity and violates Section (b)(1)(A) of the Act and violated the Union's duty of fair representation and fair dealing.

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

DO NOT WRITE IN THIS SPACE	
Case 27-CB-237955	Date Filed 3/19/2019

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 UNION 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) (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 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)			
<p style="text-align: center;">12. DECLARATION</p> <p>I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.</p> <p>By <u></u> John C. Scully, Attorney (signature of representative or person making charge) (Print/type name and title or office, if any)</p> <p style="text-align: center;">National Right to Work Legal Defense Foundation Address <u>8001 Braddock Rd., Suite 600, Springfield, VA 22160</u> (date) <u>12/11/18</u></p>		Tel. No. 703-321-8510 Cell No. Fax No. 703-321-9319 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.

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 ("Local Union"). Teamsters Local 17 is affiliated with Joint Council of Teamsters No. 3 ("Council") and the International Brotherhood of Teamsters ("International Union").
2. On or about (b) (6), (b) (7)(C) 2018, Charging Party resigned from the Unions 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 Local Union provided a breakdown of what it claimed were the expenditure it could charge the Charging Party.
4. On or about March 2, 2018, Respondent Local 17 Union provided the International Union's and Council's breakdown of chargeable/non-chargeable fees. The disclosures concerning the Council and the International were not accompanied by an independent audited and claimed in the chargeable category various non-chargeable expenditures.
5. The actions of Respondent Local Union as described in paragraph 4, restrained and coerced the Charging Party and other bargaining unit employees in the exercise of their Section 7 rights to refrain from collective activity and violate Section (b)(1)(A) of the Act and violated the Union's duty of fair representation and fair dealing.

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

DO NOT WRITE IN THIS SPACE	
Case 27-CB-238454	Date Filed 3/25/2019

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 IBEW Local 68		b. Union Representative to contact (b) (6), (b) (7)(C) Title: (b) (6), (b) (7)(C)	
c. Address (Street, city, state, and ZIP code) 5610 Logan Street CO Denver 80216-_____		d. Tel. No. (303) 295-1903	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>(1)(A)</u> , <u>(2)</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 Rocky Mountain Chapter - NECA		4a. Tel. No. (303) 937-3900	b. Cell No.
		c. Fax No.	d. e-Mail
5. Location of plant involved (street, city, state and ZIP code) 495 Uinta Way Suite 240 CO Denver 80230-_____			6. Employer representative to contact Title:
7. Type of establishment (factory, mine, wholesaler, etc.)	8. Identify principal product or service	9. Number of workers employed	
10. Full name of party filing charge (b) (6), (b) (7)(C)		11a. Tel. No. (b) (6), (b) (7)(C)	b. Cell No. (b) (6), (b) (7)(C)
		c. Fax No. (b) (6), (b) (7)(C)	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. 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) Title: (b) (6), (b) (7)(C)		Tel. No. (b) (6), (b) (7)(C)	
		Cell No. (b) (6), (b) (7)(C)	
		Fax No. (b) (6), (b) (7)(C)	
Address _____ (date) 03/23/2019 17:54:16		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) and 8(b)(2)

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 operating a hiring hall in a manner that was arbitrary, discriminatory or in bad faith.