

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

**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. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer AT&T Southwest		b. Tel. No. 512-840-6060
d. Address (Street, city, state, and ZIP code)  4544 South Lamar MS 4401 – LR Austin, TX 78745		c. Cell No.
e. Employer Representative  Joseph R. Croci, Vice President, Labor Relations		f. Fax No.
i. Type of Establishment (factory, mine, wholesaler, etc.) Telecommunications Company		g. e-Mail jc4731@att.com
j. Identify principal product or service Telecommunications Products and Services		h. Number of workers employed Approximately 25,000

k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(3) and 8(a)(5) 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 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 A.

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**

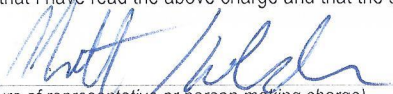
Communications Workers of America, AFL-CIO

4a. Address (Street and number, city, state, and ZIP code) THE PARKWAY, BUILDING ONE 4801 SOUTHWEST PARKWAY, SUITE 145 AUSTIN, TEXAS 78735	4b. Tel. No. 512-330-0871
	4c. Cell No.
	4d. Fax No.
	4e. e-Mail

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)** Communications Workers of America, AFL-CIO

**6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

By  Matt Holder, Attorney  
(signature of representative or person making charge) (Print/type name and title or office, if any)

Tel. No. 210-824-2653
Office, if any, Cell No.
Fax No. 210-824-3333
e-Mail matt@vanoslaw.com

Address 8626 Tesoro Dr., Ste. 510, San Antonio, TX 78217 12-29-2017 (date)

**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 A

In the six months prior to the filing of this charge, including but not limited to December 12-13, 2017, the above named employer:

1. Violated Section 8(a)(5) by implementing a layoff in bad faith by contracting a majority of the bargaining unit work at the time it instituted the layoff;
2. Violated Section 8(a)(3) by discriminating against bargaining unit employees in favor of contractors under the pretext of a layoff; and
3. Violated Section 8(a)(3) by using the aforementioned layoff as a pretext to retaliate against union supporters by selectively instituting the layoff in work groups that were staffed by more senior bargaining unit employees.

The Charging Party additionally requests injunctive relief under Section 10(j) of the National Labor Relations Act, 29 USC § 160(j), because such relief is just and proper so as to provide Charging Party and the adversely impacted bargaining unit employees with meaningful relief under the Act for the intentional, wanton, and bad faith acts of the above-named employer.