

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

**INSTRUCTIONS:**

File an original and 4 copies of this charge 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 <p style="text-align: center;">U.S. Postal Service</p>		b. Number of workers employed <p style="text-align: center;">Approx. 500,000</p>
c. Address <i>street, city, state, Zip code</i> 475 L'Enfant Plaza, S.W. Washington, D.C. 20260-4100	d. Employer Representative Doug Tulino, Vice President Labor Relations	e. Telephone No. <p style="text-align: center;">(202) 268-7447</p>
f. Type of Establishment <i>factory, mine, wholesaler, etc.</i> U.S. Mail	g. Identify principal product or service U.S. Mail	

h. 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)* (5) of the National Labor Relations Act, and 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)**

Since on or about November 22, 2013, and continuing to date, the Postal Service has failed and refused to bargain in good faith with the American Postal Workers Union, AFL-CIO, by, among other things, failing to provide information about its partnership with Staples.

APWU President Mark Dimondstein requested the information by letter dated November 22, 2013, addressed to Doug Tulino, Vice President, Labor Relations. The Postal Service has not responded with any of the requested information, although the APWU wrote: "Without prejudice to the union's right to obtain all information in a timely manner, please do not wait for all of the items to be completed before providing any information. Please provide information as it is available."

The APWU requests injunctive relief in accordance with Section 10(j) of the Act.

By the above and other acts, the above-named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act and the Postal Reorganization Act.

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**  
American Postal Workers Union, AFL-CIO (attn: Mike Morris, Director of Industrial Relations)

4a. Address <i>(street and number, city, state, and ZIP code)</i> 1300 L Street, N.W. Washington, D.C. 20005	4b. Telephone No. <p style="text-align: center;">(202) 842-4273</p>
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**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)**  

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  Anton Hajjar, Attorney  
*(signature of representative or person making charge)* O'Donnell, Schwartz & Anderson, PC *(title if any)*

Address 1300 L Street, N.W. (202) 898-1707 December 19, 2013  
Washington, D.C. 20005 *(Telephone No.)* *(date)*