

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer: Lawrence & Memorial Corporation		b. Tel. No. (860) 442-0711
		c. Cell No.
d. Address (street, city, state ZIP code) 365 Montauk Avenue New London, CT 06320	e. Employer Representative Donna Epps, Vice President/Chief Human Resources Officer	f. Fax No.
		g. e-Mail
		h. Dispute Location (City and State) New London, CT
i. Type of Establishment (factory, nursing home, hotel) Hospital	j. Principal Product or Service Health Care	k. Number of workers at dispute location about 1500

1. The above-named employer has engaged in and is engaging unfair labor practices within the meaning of section 8(a), subsection 1 and 3 and 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*)

Since on or about December 9, 2013, the above-named Employer, by its officers, agents and representatives, has failed and refused to bargain collectively and in good faith with AFT Connecticut and its affiliated local unions 5049 and 5051 by engaging in direct dealing with employees represented by the unions and, since December 10, 2013, by refusing to meet with the unions. The Employer continues to discriminate against its employees in order to discourage support for the unions by locking them out in support of its unlawful bargaining position.
The Charging Party requests injunctive relief pursuant to section 10(j) of the Act to end the illegal lockout.

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

AFT Connecticut		
4a. Address (street and number, city, state, and ZIP code) 35 Marshall Road Rocky Hill, CT 06067 ATT: Greg Kotecki		4b. Tel. No. (860) 257-9782
		4c. Cell No. (860) 303-1384
		4d. Fax No. (860) 257-1482
		4e. e-Mail GKotecki@aftct.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (<i>to be filled in when charge is filed by a labor organization</i>) American Federation of Teachers, 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.		Tel. No. (860) 570-4639
By:	Its Attorney	Office, if any, Cell No. (860) 214-9676
(signature of representative or person making charge)		Fax No. (860) 232-7818
Thomas W. Meiklejohn Livingston, Adler, Pulda, Meiklejohn & Kelly, PC 557 Prospect Avenue, Hartford, CT 06105	Date: 12/11/13	e-Mail: TWMeiklejohn@lapm.org

**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.