

EXHIBIT

A

NATIONAL LABOR RELATIONS BOARD

ROSA CEJA,)
)
 Complainant,)
)
 v.) Case No. 13-CA-144896
)
 PERSONNEL STAFFING GROUP, LLC,)
)
 Respondent.)

AFFIDAVIT OF WILLIAM PLATT

I, WILLIAM PLATT, being first duly sworn on oath, do depose and state as follows:

1. I have personal knowledge of the facts stated herein and if called to testify in this matter, I could competently testify as to all of the facts set forth in this Affidavit.
2. I am presently a Branch Manager at Personnel Staffing Group, LLC d/b/a Most Valuable Personnel ("PSG") at its Elmwood Park branch office.
3. The Complainant in the above-captioned matter, Rosa Ceja ("Ceja"), was formerly employed as a dispatcher and onsite supervisor at PSG.
4. Ceja formerly worked as a third-shift dispatcher at PSG's Elmwood Park office prior to being offered the position of an onsite supervisor at one of PSG's third-party client companies.
5. Ceja began working as an onsite supervisor at one of PSG's third-party client companies on or about September 2014.
6. Throughout September and October 2014, while Ceja was an onsite supervisor, I was aware that she was not performing to expectations and that there were several complaints regarding her performance.
7. Although I attempted to work with Ceja to resolve these performance issues and to help her adjust to her role as an onsite supervisor, Ceja continued to have these performance issues.
8. In early October 2014, Ceja's performance issues became more pronounced and problematic. There were issues with respect to employee hours and payroll, which were her responsibilities, as well as filling customer orders.

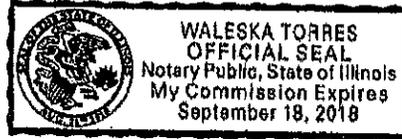
9. During this time, I also had issues with respect to Ceja's attendance. On several occasions, she indicated that she was working from home; however, as an onsite supervisor, she was required to work at the third-party client's facility.
10. Even though we made all reasonable attempts to help Ceja transition to the role of an onsite supervisor, soon thereafter we determined that Ceja was unable to meet the demanding expectations of the role.
11. Accordingly, in mid-October 2014, I offered Ceja the position of third-shift dispatcher, a position she had previous experience in.
12. At that time, Ceja thanked me and admitted that she had been overwhelmed by the onsite supervisor position.
13. On October 15, 2014, I received an email from Ceja regarding the dispatcher position. She informed me that someone was going to contact me because she did not feel safe.
14. Ceja did not elaborate on why or how she did not feel safe, and no one ever contacted me to inform me that Ceja was turning down the position.
15. Shortly thereafter, Ceja stopped responding to communications.
16. After Ceja was absent for several days, it was determined that she had abandoned her position.
17. Ceja was not terminated from her employment with PSG.
18. The decision to transition Ceja back to a dispatcher was based solely on her performance issues.
19. I have a personal Facebook page; however, I am not friends with Ceja on Facebook.
20. I have no knowledge of nor have I ever seen any Facebook posts by Ceja regarding the Chicago Workers' Collaborative.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of February, 2015.



William Platt

SUBSCRIBED AND SWORN to before me
this 5 day of February, 2015



Waleska Torres
NOTARY PUBLIC

EXHIBIT

B

Onsite Manager/Supervisor

Position Overview

The onsite supervisor is responsible for day-to-day services and management of MVP Temporary Workers at a client site. Responsibilities may include training employees, planning, assigning and directing work; releasing employees from assignment; addressing complaints and resolving problems. Ensure excellent client satisfaction at the client site, including retaining and growth of the account.

Essential Job Functions

- Inform job applicants of details such as duties and responsibilities, compensation, benefits, schedules, working conditions, or promotion opportunities.
- Interview, Drug Test and submit applicant information for Background/MVR checks
- Hire employees and process hiring-related paperwork
- Schedule and Conduct orientation of new placements prior to first day
- Reporting start dates of new hires to HR and management team.
- Prepare or maintain employment records related to events such as hiring, termination, leaves, transfers, or promotions.
- Address employee relations issues, such as harassment allegations, work complaints, or other employee concerns
- Maintain current knowledge of Equal Employment Opportunity (EEO) and affirmative action guidelines and laws, such as the Americans with Disabilities Act (ADA).
- Be well versed in PSG safety standards and policies.
- Inspect work progress, equipment, or work site to verify safety policies and procedures are being followed
- Conduct terminations
- Assess customer needs, meet PSG quality standards for services and be able to evaluate customer satisfaction

NOTE: This job description is not intended to be all-inclusive. Employee may perform other related duties as negotiated to meet the ongoing needs of the organization.

EXHIBIT

C

NATIONAL LABOR RELATIONS BOARD

ROSA CEJA,

Complainant,

v.

PERSONNEL STAFFING GROUP, LLC,

Respondent.

Case No. 13-CA-144896

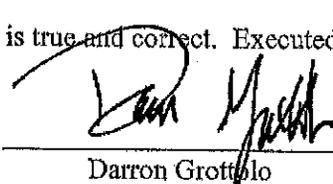
AFFIDAVIT OF DARRON GROTTOLO

I, **DARRON GROTTOLO**, being first duly sworn on oath, do depose and state as follows:

1. I have personal knowledge of the facts stated herein and if called to testify in this matter, I could competently testify as to all of the facts set forth in this Affidavit.
2. I am presently the Director of Operations for Personnel Staffing Group, LLC d/b/a Most Valuable Personnel ("PSG").
3. The Complainant in the above-captioned matter, Rosa Ceja ("Ceja"), was formerly employed as a dispatcher and onsite supervisor at PSG.
4. On or about September 23, 2014, I was informed by Ceja that a van driver for PSG had performance issues and he had also sent her text messages that she did not appreciate.
5. I immediately investigated the matter.
6. After my investigation, I informed the van driver that he was to cease any and all communications with Ceja and worked to assign him to another van driver route, where he would have no further contact with Ceja.
7. I later followed up with Ceja to ensure that the van driver was complying with my directive to stay away from Ceja. She informed me that he was.
8. At that time, I considered the matter to be resolved.
9. Throughout September and October 2014, while Ceja was an onsite supervisor, I was aware that she was not performing to expectations and that there were several complaints regarding her performance.

10. It quickly became apparent that she could not handle the responsibilities of an onsite supervisor. Accordingly, the decision was made to transfer her to another position.
11. The only open position PSG had available at the time was that of a third-shift dispatcher, which was her previous position with PSG.
12. Ceja did not inform me that she had any issues with the transition to the third-shift dispatcher position.
13. I was later informed that Ceja had stopped coming in for work, and we determined that she had abandoned her job.
14. I do not have a Facebook page.
15. I was not aware of nor have I ever seen any posts Ceja put on her Facebook page, as referenced in her Charge Against Employer.
16. To my knowledge, none of PSG's management personnel were or are aware of any posting by Ceja on her Facebook page during her employment regarding the Chicago Workers' Collaborative.
17. PSG did not terminate Ceja's employment.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4 day of February, 2015.


Darron Grotfalo

SUBSCRIBED AND SWORN to before me
this 4 day of February, 2015.


NOTARY PUBLIC



EXHIBIT

D

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Saturday, September 20, 2014 12:28 AM
To: Iveliz Figueroa
Cc: Lisette Robles
Subject: 48 hrs O.T

Iveliz,

Vazquez, Maria VEL796 check # 11960172

Maria got payed 48.43 hrs of O.T it should've 40 hrs regular 8.25 and 8.43 O.T can you please fix her check , she is really upset because i can't not give to her at this moment.

Thank you

Rosa Ceja

EXHIBIT

E

From: Arcelia Mendoza [AMendoza@mvpstaffing.com]
Sent: Friday, September 26, 2014 9:43 AM
To: TimeEP; Iveliz Figueroa
Cc: Denise Guerra; Rosa Ceja; ElmwoodParkBranch
Subject: FW: Oscar Luna LUN378 SPC 1st Shift

Good morning Iveliz.
Can you please help me out and pay Oscar Luna Aa retroactive for 3 checks he was paid at \$8.25 instead of \$10.00?
He's a machine operator at SPC 1st shift

Thank you!

Arcelia Mendoza
Elmwood Park Recruiter
Most Valuable Personnel
7514 W. North Ave.
Elmwood Park, IL 60707
Phone (708) 456-3400
Fax (708) 456/3434
Cell Phone (773) 543-0739

E-MAIL mmendoza@psgwork.com

-----Original Message-----

From: Rosa Ceja
Sent: Friday, September 19, 2014 7:19 PM
To: Denise Guerra
Cc: ElmwoodParkBranch
Subject: Re: Oscar Luna SPC 1st Shift

Denise,

Thank you , I will take care of it .

Rosa Ceja

> On Sep 19, 2014, at 5:58 PM, "Denise Guerra" <DGuerra@psgwork.com> wrote:
>
> Okay, thank you Rosa!
> I believe he also stated he needed 2 checks...one that was owed to him due to wrong pay rate 2 weeks ago & holiday pay as well.
>
> Thank you
> Denise Guerra
>
> -----Original Message-----
> **From:** Rosa Ceja
> **Sent:** Friday, September 19, 2014 3:50 PM

> To: Denise Guerra
> Cc: ElmwoodParkBranch
> Subject: Re: Oscar Luna SPC 1st Shift
>
> Denise,
>
> I have Oscar Luna Check I will take back to the office.
>
> Rosa Ceja
>
>> On Sep 19, 2014, at 3:30 PM, "Denise Guerra" <DGuerra@psgwork.com> wrote:
>>
>> Rosa,
>>
>> Do you have checks for Oscar Luna? It shows on the attachment a check was cut but I don't see a check at the office.
>>
>> Thank you
>> Denise Guerra
>>
>>
>> Sent from my Sprint phone
>> <20140919_152821.jpg>

EXHIBIT

F

From: Araceli Ocampo [AOcampo@mvpstaffing.com]
Sent: Friday, September 26, 2014 6:51 PM
To: Rosa Ceja
Cc: ElmwoodParkBranch
Subject: Maria Sotelo

Rosa,

Please help with Maria Sotelo (SO856) missing hours from Spc 2nd shift for Sep 10th.

Thank you

Araceli Ocampo
Elmwood Park Recruiter
Most Valuable Personnel
7514 w. North ave
Phone# 708-456-3400 ext 4676
Fax# 708-456-3434



Most Valuable Personnel
Experience the Difference

EXHIBIT

G

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Sunday, September 28, 2014 12:56 PM
To: Rosa Ceja
Cc: Denise Guerra; ElmwoodParkBranch
Subject: Alcantar , Leticia

Please call Alcantar, Leticia [REDACTED], she is inquiring about her check .

Thank you

Yesenia Saucedo
7514 W North Avenue , Unit B
Elmwood Park , 60707
708 456 3400 Ext 4559
708 456 3434

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Sunday, September 28, 2014 12:14 PM
To: Rosa Ceja
Cc: Arcelia Mendoza; Araceli Ocampo; Billy Platt; Denise Guerra
Subject: Checks

Rosa,

Please call Elvia Parades [REDACTED] she called the office inquiring about her check .

Thank you

Yesenia Saucedo
7514 W North Avenue , Unit B
Elmwood Park , 60707
708 456 3400 Ext 4559
708 456 3434

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Monday, September 29, 2014 12:49 PM
To: Rosa Ceja
Cc: ElmwoodParkBranch
Subject: Navarro, Angeles

Navarro, Angeles is missing 8 hours from weekending 9/7/2014. She worked Sunday 9/7/2014, 1st shift please call her .
[REDACTED]

From: Araceli Ocampo <AOcampo@mvpstaffing.com>
Sent: Wednesday, October 01, 2014 6:43 PM
To: Rosa Ceja
Subject: RE: Spc 3rd shift

You need heavies, I got somebody on the phone?

From: Rosa Ceja
Sent: Wednesday, October 01, 2014 6:38 PM
To: Araceli Ocampo
Subject: Re: Spc 3rd shift

Araceli,

Que Pazo no Tienes nada?

Rosa Ceja

On Oct 1, 2014, at 6:09 PM, "Araceli Ocampo" <AOcampo@psgwork.com> wrote:

Rosa,

I just got a call from Dominique Nelson & Brittany Hamer and they told me that last night Spc sent them back because they had too many people, now they are asking for 4 hours.

Araceli Ocampo
Elmwood Park Recruiter
Most Valuable Personnel
7514 w. North ave
Phone# 708-456-3400 ext 4676
Fax# 708-456-3434
<*image001.png*>

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Sunday, October 05, 2014 10:23 AM
To: Rosa Ceja; ElmwoodParkBranch
Subject: Latia Phillips

Rosa,

Please call Latia Phillips, she had an issue yesterday at Spc [REDACTED]
Thank you

Yesenia Saucedo

Sent on a Sprint Samsung Galaxy S4

From: Rosa Ceja <RCeja@mvpstaffing.com>
Sent: Thursday, October 09, 2014 9:51 PM
To: Araceli Ocampo
Cc: ElmwoodParkBranch
Subject: RE: Reyna Vazquez from Spc

WILL DO

From: Araceli Ocampo
Sent: Thursday, October 09, 2014 9:51 PM
To: Rosa Ceja
Cc: ElmwoodParkBranch
Subject: Reyna Vazquez from Spc

Rosa,

Please call Reyna Vazquez she is very upset because she didn't get paid last week [REDACTED]

Araceli Ocampo
Elmwood Park Recruiter
Most Valuable Personnel
7514 w. North ave
Phone# 708-456-3400 ext 4676
Fax# 708-456-3434



From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Friday, October 10, 2014 5:06 PM
To: Rosa Ceja; Alison Chalmers
Cc: ElmwoodParkBranch
Subject: Morales, Lourdes

Rosa ,

Morales, Lourdes is missing 16 hours for weekending 9/14/2014 and 8 hours from weekending 9/21/2014. She worked first shift .

From: Rosa Ceja <RCeja@mvpstaffing.com>
Sent: Friday, October 10, 2014 12:37 PM
To: Yesenia Saucedo
Cc: CiceroBranch; Alison Chalmers; ElmwoodParkBranch
Subject: Re: Marble, Rebeca D Mar055

Yesenia,

Thank you

Rosa Ceja

On Oct 10, 2014, at 12:31 PM, "Yesenia Saucedo" <YSaucedo@psgwork.com> wrote:

Rosa,

Marble , Rebeca D worked at Spc , 2nd shift , Friday and Saturday form weekending 10/5/2014, and there are no hours process for her . Can you please call her  .
<image001.png>

Yesenia Saucedo
7514 W North Avenue , Unit B
Elmwood Park , 60707
708 456 3400 Ext 4559
708 456 3434

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Friday, October 10, 2014 11:53 AM
To: Rosa Ceja
Cc: ElmwoodParkBranch; Alison Chalmers
Subject: RE: Arizmendi , Martina

Rosa ,

There is no check cut for her , Martina provides transportation for people who work 2nd shift at SPC . She is at the office and she is really upset . When are you going to fix her hours ?

Thank you

Yesenia Saucedo
7514 W North Avenue , Unit B
Elmwood Park , 60707
708 456 3400 Ext 4559
708.456 3434

From: Yesenia Saucedo
Sent: Thursday, October 09, 2014 11:42 AM
To: Rosa Ceja
Cc: ElmwoodParkBranch; Alison Chalmers
Subject: Arizmendi , Martina

Rosa ,

Arizmendi, Martina worked at Spc , 2nd shift from Tuesday to Saturday and there are no hours entred for her , please Rosa fix her hours .

From: Yesenia Taboada [YTaboada@mvpstaffing.com]
Sent: Friday, October 10, 2014 6:35 AM
To: Rosa Ceja
Cc: ElmwoodParkBranch
Subject: Antonio Hernandez

FYI

Rosa,
Antonio call he said he cant punch in , ID#363291/HERF85..



Yessie Taboada
Elmwood Park Recruiter
7514 W. North Ave.
Elmwood Park, IL 60707
Phone (708) 456-3400
Fax (708) 456/3434

E-MAIL ytaboada@psgwork.com

From: Yesenia Taboada [YTaboada@mvpstaffing.com]
Sent: Monday, October 13, 2014 1:41 PM
To: Rosa Ceja; Marcial Ramos
Cc: ElmwoodParkBranch
Subject: Alma Cabrera

Rosa

Alma Cabrera, call stating she talk to you yesterday and you said you were bringing check here at 11:am. Alma is really upset screaming at me she wants her \$\$\$. Please advice ...



Yessie Taboada
Elmwood Park Recruiter
7514 W. North Ave.
Elmwood Park, IL 60707
Phone (708) 456-3400
Fax (708) 456/3434

E-MAIL ytaboada@psgwork.com

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Friday, October 10, 2014 12:31 PM
To: Rosa Ceja; CiceroBranch
Cc: Alison Chalmers; ElmwoodParkBranch
Subject: Marble, Rebeca D Mar055

Rosa,

Marble , Rebeca D worked at Spc , 2nd shift , Friday and Saturday form weekending 10/5/2014, and there are no hours process for her . Can you please call her [REDACTED].

From: Yesenia Taboada [YTaboada@mvpstaffing.com]
Sent: Friday, October 10, 2014 12:43 PM
To: Rosa Ceja
Cc: ElmwoodParkBranch
Subject: Jason L Hughes

Rosa can you please help me. Jason said he work on 10/4/14. 6hrs . There's no hours process for me .

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Wednesday, September 03, 2014 11:47 PM
To: Marcial Ramos
Subject: Fwd: Spc ticket
Attachments: IMG_20140903_232403.jpg

----- Original Message -----

Subject: Spc ticket
From: Rosa Ceja <RCeja@psgwork.com>
To: Marcial Ramos <MRamos@psgwork.com>
CC: Lisette Robles <lisette@psgwork.com>, Billy Platt <BPlatt@psgwork.com>

Marcial,

people that are not in the ticket but they did work.

Aurelia Galvez Saturday, Sunday
Norma Padilla Saturday, Sunday

worked only Sunday
Aura De LA Cruz
Martha Sirin
Emilia Bahena

Thank you

Rosa Ceja

EXHIBIT

H

From: Rosa Ceja [RCEja@mvpstaffing.com]
Sent: Friday, September 12, 2014 7:42 PM
To: Billy Platt; Lisette Robles
Subject: Fwd: Holiday Overtime

There is a misunderstanding , the employees were promise eight hours of over time and eight hours of holiday pay that is a total of 16 hours of overtime not 8 .

I will speak to Dan in person Monday morning and I will try to get the hours approve.

----- Original Message -----

Subject: Re: Holiday Overtime
From: Dan Sims <dsims@specialtyprintcomm.com>
To: Iveliz Figueroa <IFigueroa@psgwork.com>
CC: Rosa Ceja <RCEja@psgwork.com>

Everyone who worked Monday gets time and a half for that day.

Thanks,



Daniel Sims
VP Lettershop Services
SPC
847-814-8423 C

On Sep 12, 2014, at 6:38 PM, "Iveliz Figueroa" <IFigueroa@psgwork.com> wrote:

Dan I might have misunderstand Marcial when he said the Monday would be paid overtime if the employee worked 40 or less. However we have employees who worked Monday through Saturday and or Sunday that are looking for the overtime for Saturday and Sunday in addition to the Monday.

Monday OT
Saturday and Sunday OT if they worked.

If that is what you wanted to happen I will correct the situation and apologize for the confusion, please advise.

<image001.png>Iveliz Figueroa
Manager
Direct Line 847.663.4344
Cell 773.504.8666
Efax 877.700.9018

EXHIBIT

I

From: Rosa Ceja [RCEja@mvpstaffing.com]
Sent: Monday, September 15, 2014 11:46 AM
To: 'Dan Sims'
Subject: Payroll

Good Morning Dan ,

How are you this Morning ? How was your weekend ? Our weekend orders went well , and I very excited to join your team full time . I need you to approve for me to correct the punches on Wednesday 9/10/2014 because all my employees were not able to clock out . Also , I need to make corrections in order to balance our Payroll. Please approve for me to make the corrections .

Adjustments , I have some adjustments that we need to be review can we please set up a meeting before Wednesday.

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Fax : 705 456 3434
E-Fax :847 725 0037

EXHIBIT

J

From: Yesenia Saucedo [YSaucedo@mvpstaffing.com]
Sent: Saturday, October 04, 2014 3:12 PM
To: Rosa Ceja
Cc: Esteban Ibarra; ElmwoodParkBranch
Subject: RE: 2nd shift Spc

Can I send heavies ?

From: Yesenia Saucedo
Sent: Saturday, October 04, 2014 2:54 PM
To: Rosa Ceja
Cc: Esteban Ibarra; ElmwoodParkBranch
Subject: RE: 2nd shift Spc

People send from Elmwood

1. Martina Aritmendi
2. Isaac Mendoza
3. Jesus De los Santos
4. Angel Martinez
5. Rosalba Blanco
6. Chiquita Roberts
7. Latia Phillips
8. Kristin Smith

They do not need transportation.

From: Yesenia Saucedo
Sent: Saturday, October 04, 2014 2:44 PM
To: Rosa Ceja
Cc: Esteban Ibarra; ElmwoodParkBranch
Subject: RE: 2nd shift Spc

You have 37 confirmed plus the 15 extras you asked the office ? a total of 52 ?

From: Rosa Ceja
Sent: Saturday, October 04, 2014 2:34 PM
To: Yesenia Saucedo
Cc: Esteban Ibarra; ElmwoodParkBranch
Subject: Re: 2nd shift Spc

Yesenia,

The order is 37 I'm only asking you for 15. Can you at list Send the same people that you send yesterday.

Thank you

Rosa Ceja

On Oct 4, 2014, at 2:19 PM, "Yesenia Saucedo" <YSaucedo@psgwork.com> wrote:

I have four confirm that do not need transportation. How many do you have?

Sent on a Sprint Samsung Galaxy S® 5

----- Original message -----

From: Rosa Ceja <RCeja@psgwork.com>
Date: 10/04/2014 2:16 PM (GMT-06:00)
To: Yesenia Saucedo <YSaucedo@psgwork.com>
Cc: Esteban Ibarra <EIbarra@psgwork.com>, ElmwoodParkBranch <ElmwoodParkBranch@psgwork.com>
Subject: Re: 2nd shift Spc

Yesenia,

Can you please let me have on update.

Thank you

Rosa Ceja

On Oct 4, 2014, at 1:59 PM, "Yesenia Saucedo" <YSaucedo@psgwork.com> wrote:

Martina is taking him , he has been confirmed.

Sent on a Sprint Samsung Galaxy S® 5

----- Original message -----

From: Rosa Ceja <RCeja@psgwork.com>
Date: 10/04/2014 1:52 PM (GMT-06:00)
To: Yesenia Saucedo <YSaucedo@psgwork.com>
Cc: Esteban Ibarra <EIbarra@psgwork.com>, ElmwoodParkBranch <ElmwoodParkBranch@psgwork.com>
Subject: Re: 2nd shift Spc

Angel Perez will be in the office

Rosa Ceja

On Oct 4, 2014, at 1:26 PM, "Yesenia Saucedo" <YSaucedo@psgwork.com> wrote:

They both called me 20 minutes ago asking if they were going.

Sent on a Sprint Samsung Galaxy S® 5

----- Original message -----

From: Rosa Ceja <RCeja@psgwork.com>

Date:10/04/2014 1:23 PM (GMT-06:00)
To: Yesenia Saucedo <YSaucedo@psgwork.com>
Cc: Esteban Ibarra <EIbarra@psgwork.com>,
ElmwoodParkBranch <ElmwoodParkBranch@psgwork.com>
Subject: Re: 2nd shift Spc

Yesenia,

De Los Santos Jesus.
Isaac Mendoza

They are going to the company

Rosa Ceja

On Oct 4, 2014, at 1:11 PM, "Yesenia Saucedo"
<YSaucedo@psgwork.com> wrote:

Out of the 15 how many people have your recruit?

Sent on a Sprint Samsung Galaxy S@ 5

----- Original message -----

From: Rosa Ceja <RCeja@psgwork.com>
Date:10/04/2014 1:08 PM (GMT-06:00)
To: Esteban Ibarra <EIbarra@psgwork.com>
Cc: ElmwoodParkBranch
<ElmwoodParkBranch@psgwork.com>
Subject: Re: 2nd shift Spc

Esteban,

Can you please send a van to Elmwood park.

Thank you

Rosa Ceja

On Oct 4, 2014, at 12:45 PM, "Rosa Ceja"
<RCeja@psgwork.com> wrote:

Yesenia

Here is the order for October 4-14
2nd shift Spc
Star time 3pm-end time 11pm
15 lights. You can send the same
people from yesterday.

Thank you

Rosa Ceja

EXHIBIT

K

From: Yesenia Saucedo <YSaucedo@mvpstaffing.com>
Sent: Friday, October 03, 2014 2:43 PM
To: Rosa Ceja
Cc: ElmwoodParkBranch
Subject: RE: Spc 1st shift

Please update the office on the people you recruit and we will also update you .

Thank you

Yesenia Saucedo
7514 W North Avenue , Unit B
Elmwood Park , 60707
708 456 3400 Ext 4559
708 456 3434

From: Rosa Ceja
Sent: Friday, October 03, 2014 2:30 PM
To: Yesenia Saucedo
Cc: ElmwoodParkBranch
Subject: Spc 1st shift

Yesenia,

Here is the order for October 5-14
1st shift Spc
Star time 7am-end time 3pm
Additional 8 lights.

Thank you
Rosa Ceja

EXHIBIT

L

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Monday, September 08, 2014 2:17 AM
To: Lisette Robles
Subject: 3rd shift spc

Lisette

Spc 3rd shift is short 7 L duties I'm not happy at all. I will go around the area of Niles and drop flyers.

Thank you

Rosa Ceja

EXHIBIT

M

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Thursday, September 11, 2014 6:47 PM
To: Araceli Ocampo; Arcelia Mendoza
Cc: ElmwoodParkBranch
Subject: 5 Lights for SPC 1st shift

Arcelia,

Spc 1st shift needs 5 Lights additional to the order. It is very important to fill the order because they are going to another department. Esteban will have a van at the office as soon as they finish piking up regular.

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Fax : 705 456 3434
E-Fax :847 725 0037

From: Rosa Ceja <RCeja@mvpstaffing.com>
Sent: Friday, September 12, 2014 7:59 PM
To: Esteban Ibarra
Cc: ElmwoodParkBranch; Lisette Robles; Billy Platt
Subject: Re: Spc

Esteban,

The same people for 1st shift and for 2nd shift 41 lights.

Thank you

Esteban Ibarra <Elbarra@psgwork.com> wrote:

What is the order for tomorrow 1st shift and 2nd if we know it because I have weekend temps calling

Sent from my iPhone

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Sunday, September 21, 2014 1:08 PM
To: Esteban Ibarra
Cc: ElmwoodParkBranch
Subject: 2nd shift Spc

Esteban,

Everyone that worked yesterday 2nd shift will work today and Elsa Mancilla.

Thank you

Rosa Ceja

From: Rosa Ceja [RCEja@mvpstaffing.com]
Sent: Wednesday, October 01, 2014 8:22 PM
To: Araceli Ocampo
Subject: 10 lights for spc 1st shift 10/02/14

Araceli,

Can I please have an up date for the order of 10 lights for spc 1st shift 10/02/14

Thank you

Rosa Ceja

7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Cell: 773 956 4003
Fax : 705 456 3434
E-Fax :847 725 0037

From: Rosa Ceja [RCEja@mvpstaffing.com]
Sent: Saturday, October 04, 2014 12:45 PM
To: Yesenia Saucedo
Subject: 2nd shift Spc

Yesenia

Here is the order for October 4-14
2nd shift Spc
Star time 3pm-end time 11pm
15 lights. You can send the same people from yesterday.

Thank you

Rosa Ceja

From: Rosa Ceja [RCEja@mvpstaffing.com]
Sent: Thursday, October 09, 2014 12:55 PM
To: Billy Platt
Cc: Yesenia Saucedo; ElmwoodParkBranch
Subject: Re: 2and shift

Billy,

I need 4 lights for another department.

Rosa Ceja

On Oct 9, 2014, at 12:47 PM, "Billy Platt" <BPlatt@psgwork.com> wrote:

Rosa,

The order is for 45 lights, why are you requesting 49. This should be covered by you since we had more yesterday.

3rd shift should be covered as well since there 10 short from last night.

Thank you,

Billy Platt
PSG

----- Reply message -----

From: "Rosa Ceja" <RCEja@psgwork.com>
To: "Yesenia Saucedo" <YSaucedo@psgwork.com>
Cc: "ElmwoodParkBranch" <ElmwoodParkBranch@psgwork.com>
Subject: 2and shift
Date: Thu, Oct 9, 2014 12:44 PM

Hi Yesenia,

please see new list for 2nd shift.

Spc 2nd shift

The following people are on schedule for 10/09/14
Start time 3:pm and time 11:00pm

1. Maria Elias
2. Angel Perez
3. Gabriel de Los santos
4. Ester Dorante
4. Maria G Sanchez
5. Maria Velazquez

6. Graciela Franco
7. Guadalupe Franco
8. Jesus de Los Santos
9. María Flores
10. Rosa Ortiz
11. Araceli Ortiz
12. Maria Elias
13. William Gibson
14. Mark Serrano
15. San Mitchell
16. Mara Rodriguez
17. Angelica Flores
18. Isack Mendoza
19. Maria Palma
20. María Elias
21. Esteban 1
22. Esteban 2
24. Esteban 3
25. Esteban 4
26. Esteban 5
27. Esteban 6
28. Esteban 7
29. Esteban 8
30. Esteban 9
31. Esteban 10
32. Esteban 11
33. Esteban 12
34. Esteban 13
35. Esteban 14

Esteban have 14 lights

Elmwood please send 14 lights from the office to cover the order.

Thank you

Rosa Ceja

7514 W North Avenue

Elmwood Park, IL 60707

Office: 708 456 3400 Ext 4510

Cell: 773 956 4003

Fax : 705 456 3434

E-Fax :847 725 0037

EXHIBIT

N

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Friday, October 10, 2014 4:32 PM
To: Yesenia Saucedo
Cc: ElmwoodParkBranch; Alison Chalmers
Subject: RE: 2nd shift

Hi Yesenia,

Eric Russell and Steve Ollie are going to whet send home. Please when the order drops we cant send new people.

1. Kankeena Orr
2. Jennifer Watson
3. Keenan Boatman
4. Mella Lafayette
5. Doretta Bridges
6. Eric Russell
7. Steve Ollie
8. Kendall Green
9. Jhonny Carcamo
10. Liesel Rodriguez
11. Ivory Collins
12. Shaquan Oliver
13. Rianne Williams
14. Lila Otardla
15. Micaela Alvino
16. Miguel Martinez
17. Ullses Moran

Ismael, Antonio

Thank you

Rosa Ceja

7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Cell: 773 956 4003
Fax : 705 456 3434
E-Fax :847 725 0037

18.

From: Yesenia Saucedo
Sent: Friday, October 10, 2014 4:25 PM
To: Rosa Ceja
Cc: ElmwoodParkBranch; Alison Chalmers
Subject: 2nd shift

Rosa,

The following people were send to Spc :

1. Kankeena Orr
2. Jennifer Watson
3. Keenan Boatman
4. Mella Lafayette
5. Doretta Bridges
6. Eric Russell
7. Steve Ollie
8. Kendall Green
9. Jhonny Carcamo
10. Liesel Rodriguez
11. Ivory Collins
12. Shaquan Oliver
13. Rianne Williams
14. Lila Otarola
15. Micaela Alvino
16. Miguel Martinez
17. Ulises Moran
18. Ismael , Antonio

Thank you

Yesenia Saucedo

7514 W North Avenue , Unit B

Elmwood Park , 60707

708 456 3400 Ext 4559

708 456 3434

EXHIBIT

0

From: Rosa Ceja [RCEja@mvpstaffing.com]
Sent: Wednesday, October 08, 2014 5:49 PM
To: Iveliz Figueroa
Cc: Billy Platt; Alison Chalmers; 'George R. Uhlar'
Subject: FW:
Attachments: SPCOMM ...csv; ELF.CSV; doc194763.pdf

Hi Iveliz

Pease see attachments for SPC payroll .

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Cell: 773 956 4003
Fax : 705 456 3434
E-Fax :847 725 0037

EXHIBIT

P

From: Billy Platt <BPlatt@mvpstaffing.com>
Sent: Wednesday, September 24, 2014 12:52 PM
To: Rosa Ceja
Cc: Yesenia Saucedo; Arcelia Mendoza; Araceli Ocampo
Subject: RE: Spc 2nd shift

Rosa,

Let's get Esteban out of the equation when it comes to temps at SPC, start to work with them yourself and get their names and numbers. This way, you have control of your people and filling the orders. I want to eliminate the drivers from SPC recruiting and have them concentrate on getting our employees on time.

Thank you,

-----Original Message-----

From: Rosa Ceja
Sent: Wednesday, September 24, 2014 12:47 PM
To: Esteban Ibarra
Cc: ElmwoodParkBranch
Subject: Spc 2nd shift

Esteban,

Spc 2nd shift order 23 lights and 4 heavies please send the same people.

Thank you

Rosa Ceja

EXHIBIT

Q

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Saturday, September 20, 2014 12:55 PM
To: Lisette Robles
Cc: Billy Platt
Subject: FW: memo please

Lisette,

Dan plan manager from SPC is asking for a Policy to punch in or out. I will have it ready by tomorrow.

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Fax : 705 456 3434
E-Fax :847 725 0037

From: Dan Sims [mailto:dsims@specialtyprintcomm.com]
Sent: Saturday, September 20, 2014 9:01 AM
To: Rosa Ceja; Darron Grottolo
Subject: memo please

It is SPC policy to dock people for failure to punch in or out. We have docked people an hour for egregious reoccurrences, a half hour is the standard.

Labor Temps has posted a policy reflecting that; I would like you to do the same, in order to be consistent.

Appreciate that.



Daniel Sims
VP Lettershop Services
847-814-8423 T (Cell)
dsims@specialtyprintcomm.com

Total Control Panel

[Login](#)

To: rceja@psgwork.com [Remove](#) this sender from my allow list
From: dsims@specialtyprintcomm.com

You received this message because the sender is on your allow list.

EXHIBIT

R

From: Rosa Ceja <RCeja@mvpstaffing.com>
Sent: Saturday, September 20, 2014 11:34 AM
To: Dan Sims
Subject: Re: memo please

Dan,

I will be on top of that.

Rosa Ceja

On Sep 20, 2014, at 10:30 AM, "Dan Sims" <dsims@specialtyprintcomm.com> wrote:

In the interim all of your people need to know the policy. They need to know that it is across the board. All agencies. All shop floor employees.

<image001.jpg>

Daniel Sims
VP Lettershop Services
847-814-8423 T (Cell)
dsims@specialtyprintcomm.com

From: Rosa Ceja [<mailto:RCeja@psgwork.com>]
Sent: Saturday, September 20, 2014 9:55 AM
To: Dan Sims
Cc: Darron Grottolo
Subject: Re: memo please

Good morning Dan,

I apologize for not having a sign to represent Spc policies, I will have one ready as soon as possible. I will also make sure to inform every employee of the polices that need to be follow in a daily basis.

I appreciate your concerns.

Thank you

Rosa Ceja

On Sep 20, 2014, at 9:03 AM, "Dan Sims" <dsims@specialtyprintcomm.com> wrote:

It is SPC policy to dock people for failure to punch in or out. We have docked people an hour for egregious reoccurrences, a half hour is the standard.

Labor Temps has posted a policy reflecting that; I would like you to do the same, in order to be consistent.

Appreciate that.

<image001.jpg>

Daniel Sims
VP Lettershop Services
847-814-8423 T (Cell)
dsims@specialtyprintcomm.com

Total Control Panel

[Login](#)

To: rceja@psgwork.com

[Remove this sender from my allow list](#)

From: dsims@specialtyprintcomm.com

You received this message because the sender is on your allow list.

EXHIBIT

S



EMPLOYEE PAYROLL CHANGE

EMPLOYEE PROFILE

Employee Name: ROSA CEJA Social Security #: [redacted]
Date: 10/13/2014 Date Effective: 10/13/2014

EMPLOYMENT CHANGES

New Hire: [] Job Title: Department:
Rehire: [] Job Title: Department:
Temporary: [] Start Date: End Date: Department:
Replacement: [] Start Date: End Date: Department:

CLASSIFICATION CHANGES

Table with 3 columns: Change, Old Information, New Information. Rows include Title/Dept, Shift, Location, Salary, and Hourly rates.

ADDITIONAL EMPLOYEE INFORMATION

VERIFYING SIGNATURES NEEDED FOR APPROVAL

- 1. Supervisor / Manager: [Signature]
2. Director / Executive:
3. CFO:

EXHIBIT

T

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Monday, September 15, 2014 12:29 AM
To: Billy Platt
Cc: Esteban Ibarra
Subject: Adrian 3rd shift Driver

Billy,

There was a misunderstanding regarding the third shift driver Adrian. Since the first day of me working at Spc , he was been a big help on third shift. He is calling me everyday on third shift, to verify the orders because he is not only a driver but also a recruiter. I haven't been short on third be cause Adrian is constantly calling me on a daily basis. The incident that Araceli mention on her email was not because Adrian didn't pick up the people , it was because there was no more room in his van, and he is not going to put the employees lives in risk.

I don't have any complains regarding Adrian, he is a good part of my team not just for myself but also for Spc.

Thank you

Rosa Ceja

EXHIBIT

U



Date: 10/20/14

Employee Name: ROSA CEJA

Location: ELMWOOD PARK

Effective Date: 10/20/2014

Termination Reason: JOB ABANDONMENT

Severance to be paid: Yes No If Yes, Number of Weeks: _____

Last Month for Commission: NONE

Employee Loans

Outstanding Loan balance: (please contact payroll for balance) \$ 2,500

How will loan balance be paid back: Current net check will be applied to ~~net~~ balance.

There will be an amount left and not sure how we will get it paid off since I'm receiving no cut back from her.

Equipment to Be Turned In

<u>Elmwood Park office keys</u>	Returned <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Received By: <u>Waukegan office (Darrow)</u>
<u>Laptop</u>	Returned <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Received By: <u>Waukegan office (Darrow)</u>
<u>MVP cell phone</u>	Returned <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Received By: <u>Waukegan office (Darrow)</u>
_____	Returned <input type="checkbox"/> Yes <input type="checkbox"/> No	Received By: _____

Other Instructions: I've tried Rosa numerous times via text, phone call, and email with no response.

Manager Signature: [Signature]

EXHIBIT

V

**PERSONNEL STAFFING GROUP, LLC
VACATION / TIME OFF FORM**

DATE:

NAME:

DATE(S) Oct 15th, 16th, 17th, 18th, and 19th

TOTAL NUMBER OF DAYS OFF: 5

VACATION _____ JURY DUTY _____

SICK TIME _____ OTHER _____

THIS SECTION TO BE COMPLETED BY ADMINISTRATION

APPROVED YES _____

NO _____

REASON (IF NO) Just documenting on this because she was never granted or asked for these days off. Never returned a phone call or email. Job abandonment

EMPLOYEE SIGNATURE	DATE
	<u>10/20</u>

ADMIN SIGNATURE	DATE
<u>[Signature]</u>	<u>10/20</u>

**** IF TIME OFF REQUESTED CHANGES PLEASE NOTIFY YOUR MANAGER SO THAT YOUR VACATION RECORDS CAN BE ADJUSTED.**

EXHIBIT

W

Billy Platt

From: Jeffrey Bobroff
Sent: Thursday, October 16, 2014 9:55 AM
To: Billy Platt
Subject: RE: SPC

I have yet to see her here at all! Per Marcial, she has not helped with payroll and he has requested her assistance on some missing hours, but has gotten nothing in return from her. The girls in the office have been assisting him to catch up on the missing hours.

Thanks

From: Billy Platt
Sent: Thursday, October 16, 2014 9:49 AM
To: Jeffrey Bobroff
Subject: RE: SPC

She's the old onsite that is supposed to be helping Marcial with payroll for last week. Is this not happening?

From: Jeffrey Bobroff
Sent: Thursday, October 16, 2014 9:48 AM
To: Billy Platt
Subject: RE: SPC

OK. Who's this Rosa person you keep asking about? I have yet to see her!!!

From: Billy Platt
Sent: Thursday, October 16, 2014 9:38 AM
To: Jeffrey Bobroff
Subject: Re: SPC

Arcy and Yesenia are working on it. Please communicate with them. Have you seen Rosa?

Billy Platt
PSG

----- Reply message -----

From: "Jeffrey Bobroff" <JBobroff@psgwork.com>
To: "Billy Platt" <BPlatt@psgwork.com>
Subject: SPC
Date: Thu, Oct 16, 2014 9:22 AM

Do you have the adjustments for the missing hours yet?

From: Billy Platt
Sent: Thursday, October 16, 2014 9:08 AM
To: Jeffrey Bobroff
Subject: RE: SPC

EXHIBIT

X



Niles Police Department

Summary



Print Date/Time: 11/12/2014 15:07
 Login ID: ckobeski
 Case Number: 2014-00027062

ORI Number: Niles PD: IL0167300

Case

Case Number: 2014-00027062
 Location: 6015 W HOWARD ST
 NILES, IL
 Reporting Officer ID: 236 - Romano

Incident Type: Battery
 Occurred From: 09/13/2014 12:00
 Occurred Thru: 09/13/2014 22:00
 Disposition:
 Disposition Date:
 Reported Date: 10/22/2014 18:15 Wednesday

Offenses

No.	Group/ORI	Crims Code	Statute	Description	Counts
1	State	0460	720 ILCS 5/12-3	Battery	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect/Offender	1	Ibama, Alberto				Male	
Victim	1	Ceja, Rosa				Female	27

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
1958-A	Ibama, Alberto	7000 W TOLHY AVE NILES, IL 60714	10/25/2014 09:16	Misdemeanor	48

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State
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Victim/CEJA came to this agency to report the following: CEJA said she worked for MVP (Most Valuable Personnel) located at 7514 W. North Ave, Elmwood Park. MVP is a "Temporary Employment" agency. CEJA said she manages all the temporary workers and her co-worker (Suspect/IVARRA) works as a driver who delivers workers to various locations.

CEJA said she has always felt uncomfortable around IVARRA because he sexually harasses her and other female employees. CEJA said IVARRA makes a sexual comment about everything, no matter what the subject of conversation is, IVARRA makes it sexual.

On 9/13/14, both CEJA and IVARRA happened to be at Specialty Printing, located at 6019 Howard. They were both there on work related issues for MVP. Later in the evening, CEJA was in the rear parking lot getting ready to leave when IVARRA approached her while she was in her vehicle. IVARRA started a conversation with CEJA and the subject came up about CEJA saving up for a house and that she was short \$2,500.00. IVARRA said he would give her the money she needed if she would have sex with him. CEJA declined the offer and asked him why he always disrespected her. At some point, IVARRA, who was outside the vehicle, started kissing CEJA on her lips and neck while she was sitting in the vehicle. At one point, IVARRA grabbed CEJA's left breast before she was able to separate herself from him. They both eventually went their separate ways.

CEJA said IVARRA grabbed her breast on one other occasion after this incident and she finally went to management to report IVARRA. CEJA claims management offered to help but never followed through. She said they eventually re-located IVARRA to their Waukegan IL office so they wouldn't have to work with each other, but refused to fire him.

CEJA said she needed counseling after the incident and through counseling she was advised to make a police report. CEJA wants to sign a complaint against IVARRA and has since quit her job. A follow up is requested.

Note: The information CEJA provided for IVARRA is very vague.

Supplemental Report

Suspect: IBARRA, Alberto M. [REDACTED]

On 10/24/14, I/O (Detective ROMANO) made contact with Suspect/IBARRA over the phone. He agreed to meet I/O at NPD on 10/25/14 to talk about the case.

On 10/25/14, IBARRA met with this I/O. He was read his Miranda Rights which he invoked at 0916 Hrs. IBARRA was charged with Battery and given a court date of 12/11/14, 0900 Hrs, room 103.

This case is closed by an arrest.

OfficerID: jromano, Arrest Narrative

Arrestee came to this agency to turn himself in. He was taken into custody and charged. See Detective Supplemental for further information.



Niles Police Department Summary



Print Date/Time: 11/12/2014 16:07
Login ID: ckobeški
Case Number: 2014-00027082

ORI Number: Niles PD
IL0167300

Routing:

EXHIBIT

Y

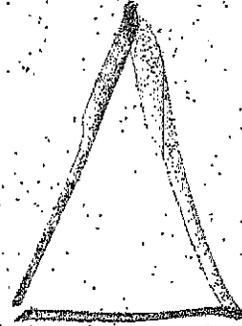
WORKERS' LAW OFFICE, PC

401 S. LASALLE STREET · SUITE 1400 · CHICAGO · ILLINOIS · 60605 · PHONE 312-795-8121 · FAX 312-929-2207

January 22, 2015

Via Electronic Mail

Eryk Wachnik
Prosecutor
Cook County, Illinois



Re: *IL (Ceja) v. Alberto Ibarra*
Niles Police Dept. Case No. 2014-00027062

Dear Mr. Wachnik:

Our firm is representing Ms. Rosa Ceja in a matter pending before the Equal Employment Opportunity Commission and for her charge of sexual assault and battery in the above-captioned matter. We do not have the case number for the criminal matter, so have attached the Niles Police Department Police Report ("hereafter "Police Report") as Exhibit A for your reference. I am writing to provide you with the following information:

1. **Clarify the Police Report:** Our office has obtained a copy of the above-referenced Police Report. The police officer who took the original Police Report recorded some of the information incorrectly in slight, but important ways. Therefore, I have attached, as Exhibit B, a declaration from Ms. Ceja clarifying those points. If you need to meet with her regarding her testimony, please feel to contact my office and we will be able to produce her.
2. **Provide information related to the incidents:** As described in Ms. Ceja's declaration, there were two significant issues involving touching of a sexual nature by Mr. Alberto Ibarra, a van driver for Personnel Staffing Group, LLC d/b/a MVP (hereafter "MVP").
 - a. **August 27, 2014 Incident:** As described in Ms. Ceja's Declaration, Mr. Ibarra approached Ms. Ceja while she was in her car in the parking lot of MVP's client company, Specialty Print Communications (hereafter "SPC"), and reached in and grabbed her breasts and then put his hand up her dress. This incident occurred at SPC's former building at 6250 W. Howard, Niles, Illinois 60714. SPC's phone number is (847) 588-2580. I have attached a photo (from Google Map Street View), Exhibit C, of this site. I have also identified approximately where Ms. Ceja's vehicle was when Mr. Ibarra approached her

as explained by my client. I have also identified security cameras that I saw in that parking lot that I was able to identify at the location.

- b. September 13 or 14, 2014: As described in Ms. Ceja's Declaration, Mr. Ibarra approached Ms. Ceja near her vehicle, grabbed her sexually and attempted to drag her, resisting, into his van while she and Mr. Ibarra were both in the parking lot of SPC's "new" building located at 7640 N. Lehigh Ave, Niles, Illinois 60714. Again, I have attached a photo (from Google Map Street View), attached as Exhibit D, of this site. I have also identified approximately where both Ms. Ceja's vehicle and Mr. Ibarra's van were located when Mr. Ibarra grabbed Ms. Ceja and attempted to drag her into his van. I have also identified security cameras that I saw in that parking lot that I was able to identify at the location.
3. Provide a text message from Mr. Ibarra to Ms. Ceja: Ms. Ceja used a company phone when communicating with any other MVP employees, including Mr. Ibarra. After being terminated, Ms. Ceja had to turn in the phone to MVP. She was able to forward one text message that Mr. Ibarra sent to Ms. Ceja on September 15, 2014 (shortly after the second incident described above), which is attached as Exhibit E. I would also note that our firm has sent a preservation letter to MVP requiring the company to preserve, among other items, the cell phone, including all texts and emails, sent from MVP phone used by Ms. Ceja (847-344-2833). A copy of the preservation letter is attached as Exhibit F.

Please let me know if you need any additional information, have any questions or need to speak with Ms. Ceja.

Sincerely,



Christopher J. Williams

CJW/ms

Enclosures

*****PLEASE NOTE: Effective February 1, 2015, our new office address will be:
53 W. Jackson Blvd., Suite 701, Chicago, Illinois 60604**

EXHIBIT A



Niles Police Department

Summary



Print Date/Time: 11/12/2014 15:07
 Login ID: ckobeski
 Case Number: 2014-00027082

Niles PD:
 ORI Number: IL0167300

Casa

Case Number: 2014-00027082
 Location: 6015 W HOWARD ST
 NILES, IL
 Reporting Officer ID: 238 - Romano

Incident Type: Battery
 Occurred From: 09/13/2014 12:00
 Occurred Thru: 09/13/2014 22:00
 Disposition:
 Disposition Date:
 Reported Date: 10/22/2014 18:15 Wednesday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	0460	720 ILCS 6/12-3	Battery	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect/Offender	1	Ivorra, Alberto				Male	
Victim	1	Ceja, Rosa				Female	27

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
1868 A	Ivorra, Alberto	7000 W TOLHY AVE NILES, IL 60714	10/25/2014 09:16	Misdemeanor	48

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License	Plate	State
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Victim/CEJA came to this agency to report the following; CEJA said she worked for MVP (Most Valuable Personnel) located at 7514 W. North Ave, Elmwood Park. MVP is a "Temporary Employment" agency. CEJA said she manages all the temporary workers and her co-worker (Suspect/IVARRA) works as a driver who delivers workers to various locations.

CEJA said she has always felt uncomfortable around IVARRA because he sexually harasses her and other female employees. CEJA said IVARRA makes a sexual comment about everything, no matter what the subject of conversation is, IVARRA makes it sexual.

On 9/13/14, both CEJA and IVARRA happened to be at Specialty Printing, located at 8019 Howard. They were both there on work related issues for MVP. Later in the evening, CEJA was in the rear parking lot getting ready to leave when IVARRA approached her while she was in her vehicle. IVARRA started a conversation with CEJA and the subject came up about CEJA saving up for a house and that she was short \$2,500.00. IVARRA said he would give her the money she needed if she would have sex with him. CEJA declined the offer and asked him why he always disrespected her. At some point, IVARRA, who was outside the vehicle, started kissing CEJA on her lips and neck while she was sitting in the vehicle. At one point, IVARRA grabbed CEJA's left breast before she was able to separate herself from him. They both eventually went their separate ways.

CEJA said IVARRA grabbed her breast on one other occasion after this incident and she finally went to management to report IVARRA. CEJA claims management offered to help but never followed through. She said they eventually re-located IVARRA to their Waukegan IL office so they wouldn't have to work with each other, but refused to fire him.

CEJA said she needed counseling after the incident and through counseling she was advised to make a police report. CEJA wants to sign a complaint against IVARRA and has since quit her job. A follow up is requested.

Note: The information CEJA provided for IVARRA is very vague.

Supplemental Report

Suspect: IBARRA, Alberto M. [REDACTED]

On 10/24/14, I/O (Detective ROMANO) made contact with Suspect IBARRA over the phone. He agreed to meet I/O at NPD on 10/25/14 to talk about the case.

On 10/25/14, IBARRA met with this I/O. He was read his Miranda Rights which he invoked at 0916 Hrs. IBARRA was charged with Battery and given a court date of 12/11/14, 0900 Hrs, room 103.

This case is closed by an arrest.

OfficerID: jromano, Arrest Narrative

Arrestee came to this agency to turn himself in. He was taken into custody and charged. See Detective Supplemental for further information.



Niles Police Department Summary



Print Date/Time: 11/12/2014 15:07
Login ID: ckobeski
Case Number: 2014-00027062

ORI Number: Niles PD
IL0167300

Routing:

EXHIBIT B

DECLARATION OF ROSA CEJA

I, Rosa Ceja, under penalty of perjury, state based on personal knowledge that the following facts are true and correct;

1. I am over the age of 21 years.

2. I currently reside in Chicago, Illinois.

3. I am receipt of a copy of the police report taken by the Niles Police Department in Case No. 2014-00027062, attached as Exhibit 1. I provide the following to clarify certain information in the Police Report.

4. There were two incidents in which Mr. Ibarra assaulted me and touched me sexually against my will. Beginning in the third paragraph on page 2 of the case narrative, I provide the following clarifications:

a. The first incident occurred on or about August 27, 2014 at approximately 2:30 – 3:00 p.m. at Specialty Print Communication's ("SPC") old production facility located at or about 6250 W. Howard, Niles, Illinois.

i. I was parked in the parking lot of one of Personnel Staffing Group, LLC d/b/a MVP's ("MVP") clients, SPC. I was there for business to meet my supervisor, Mr. Maciel.

ii. As I was preparing to leave, Mr. Ibarra, a van driver for MVP, approached my vehicle while I was sitting in the driver seat. Mr. Ibarra started a conversation with me and the subject came up that I was saving money to buy a house, but that I was still short \$2,500. Mr. Ibarra said to me in Spanish: "I will give you the money if you will have sex with me" or words to that effect. Mr. Ibarra then reached into my vehicle, put his hand

under my dress and rubbed my breast on the skin. I pushed Mr. Ibarra away and yelled "STOP!" Mr. Ibarra then reached down and put his hand under my dress on my skin and up my left leg, near my crotch area. I again pushed Mr. Ibarra's hand away and said "Why don't you respect me", or words to that effect.

iii. Mr. Ibarra then began laughing and could see that I was angry. He then said, "You know, I can help you get a loan from MVP", or words to that effect. I responded by saying I could take care of it myself.

iv. My supervisor, Mr. Maciel, then came out of the building and Mr. Ibarra left.

b. The second incident occurred on or about September 13, 2014 or September 14, 2014 at SPC's new production facility located at or about 7460 N. Lehigh Ave., Niles, Illinois at approximately 10:00 – 11:00 pm.

i. I came to SPC as part of my job for MVP to make sure all of MVP's employees who were performing work at SPC were able to get a ride home on one of MVP's vans. My niece and nephew were in my car, 7 and 9 years old respectively.

ii. Mr. Ibarra appeared at the parking lot. He had no business reason to be there. He was not there to drive any MVP employees home.

iii. After all of the MVP employees left in the MVP vans, Mr. Ibarra approached me as I was standing near my vehicle.

iv. Mr. Ibarra grabbed me in an embrace with force and against my will. Mr. Ibarra was able to overpower me. I was face-to-face with Mr. Ibarra. Mr.

Ibarra pulled me toward his van, which was parked nearby. While he was dragging me toward his van, he continually tried to kiss me on my lips. I turned my face so he only touched my cheek.

- v. During this encounter, I continually attempted to push Mr. Ibarra away. I yelled "What are you doing?", or words to that effect. Mr. Ibarra responded "You look so good to me. Look how hard you make me. You are so pretty", or words to that effect while pushing his body against me. He continued to try to kiss me. I continued to push him away and turn my face away.
- vi. Finally, after I threatened to go inside and report him to SPC, Mr. Ibarra let me go and backed off.
- vii. Later that night, Mr. Ibarra called me on a cell phone provided by MVP. Mr. Ibarra said: "Have you put the kids to bed because I want to have phone sex with you", or words to that effect. I hung up.
- viii. On or about September 15, 2015, Mr. Ibarra sent a sexual text to my MVP cell phone in Spanish, attached as Exhibit 2, while I was at work.
- ix. I told my co-worker, Yesenia Salsedo: "I can't take this anymore, he [Alberto Ibarra] crossed a line", or words to that effect.

5. I reported Mr. Ibarra's conduct to my supervisors. They did nothing to resolve the issue other than to reassign me to a lesser position of Dispatcher on the third shift at MVP's Elmwood Park office, an assignment that MVP knew I could not take because it would require that I close the office alone after midnight. Nothing happened to Mr. Ibarra as a result of these incidences and my complaints.

Pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned, Rosa Ceja, certifies that s/he has read the foregoing document, and that the statements set forth in the document are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Dated: 1/21/15

Rosa Ceja

EXHIBIT 1



Niles Police Department

Summary



Print Date/Time: 11/12/2014 15:07
 Login ID: okobaski
 Case Number: 2014-00027062

ORI Number: Niles PD
 IL0167300

Case

Case Number: 2014-00027062	Incident Type: Battery
Location: 8016 W HOWARD ST NILES, IL	Occurred From: 09/13/2014 12:00
Reporting Officer ID: 236 - Romano	Occurred Thru: 09/13/2014 22:00
	Disposition:
	Disposition Date:
	Reported Date: 10/22/2014 18:15 Wednesday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	0400	720 ILCS 5/12-3	Battery	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect/Offender	1	Ibarra, Alberto				Male	
Victim	1	Ceja, Rosa				Female	27

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
1968A	Ibarra, Alberto	7000 W TOUCHY AVE NILES, IL 60714	10/25/2014 09:18	Misdemeanor	48

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
------	------	------	------	-------	-------------	---------	----------

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State
-----	------	--------------	------	------	-------	-------	---------------	-------

Victim/CEJA came to this agency to report the following; CEJA said she worked for MVP (Most Valuable Personnel) located at 7514 W. North Ave. Elmwood Park. MVP is a "Temporary Employment" agency. CEJA said she manages all the temporary workers and her co-worker (Suspect/IVARRA) works as a driver who delivers workers to various locations.

CEJA said she has always felt uncomfortable around IVARRA because he sexually harasses her and other female employees. CEJA said IVARRA makes a sexual comment about everything, no matter what the subject of conversation is, IVARRA makes it sexual.

On 9/13/14, both CEJA and IVARRA happened to be at Specialty Printing, located at 6019 Howard. They were both there on work related issues for MVP. Later in the evening, CEJA was in the rear parking lot getting ready to leave when IVARRA approached her while she was in her vehicle. IVARRA started a conversation with CEJA and the subject came up about CEJA saving up for a house and that she was short \$2,500.00. IVARRA said he would give her the money she needed if she would have sex with him. CEJA declined the offer and asked him why he always disrespected her. At some point, IVARRA, who was outside the vehicle, started kissing CEJA on her lips and neck while she was sitting in the vehicle. At one point, IVARRA grabbed CEJA's left breast before she was able to separate herself from him. They both eventually went their separate ways.

CEJA said IVARRA grabbed her breast on one other occasion after this incident and she finally went to management to report IVARRA. CEJA claims management offered to help but never followed through. She said they eventually re-located IVARRA to their Waukegan IL office so they wouldn't have to work with each other, but refused to fire him.

CEJA said she needed counseling after the incident and through counseling she was advised to make a police report. CEJA wants to sign a complaint against IVARRA and has since quit her job. A follow up is requested.

Note: The information CEJA provided for IVARRA is very vague.

Supplemental Report

Suspect: IBARRA, Alberto M/ [REDACTED]

On 10/24/14, I/O (Detective ROMANO) made contact with Suspect/IBARRA over the phone. He agreed to meet I/O at NPD on 10/25/14 to talk about the case.

On 10/25/14, IBARRA met with this I/O. He was read his Miranda Rights which he invoked at 0916 Hrs. IBARRA was charged with Battery and given a court date of 12/11/14, 0900 Hrs, room 103.

This case is closed by an arrest.

OfficerID: jromano, Arrest Narrative

Arrestee came to this agency to turn himself in. He was taken into custody and charged. See Detective Supplemental for further information.



Niles Police Department Summary



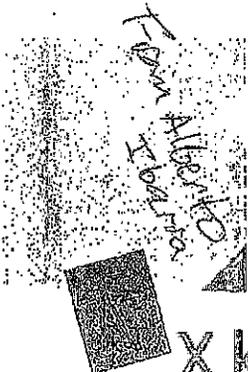
Print Date/Time: 11/12/2014 15:07
Login ID: ckobeski
Case Number: 2014-00027062

ORI Number: Niles PD IL0167300

Routing:

EXHIBIT 2

Can you forward Alberto texts?



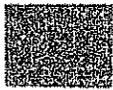
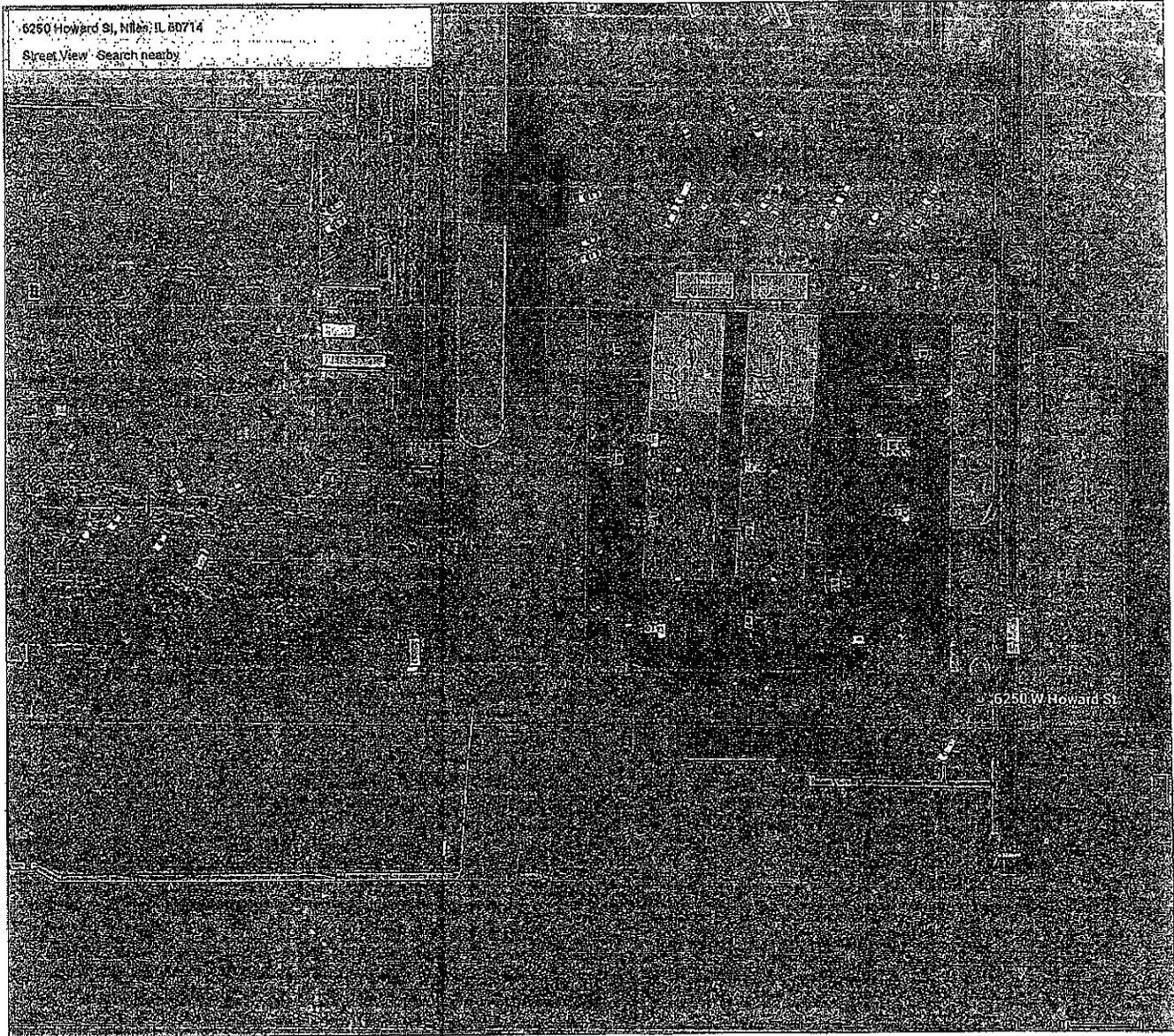
X k no t puedo sacar de mi mente
estabas tan Linda anoche k como m
gusto verte con ese vestido jajsja



Hi Darron how you doing? can I take
money orders to Waukegan branch
for the loan or will you like me to send
it to main office?



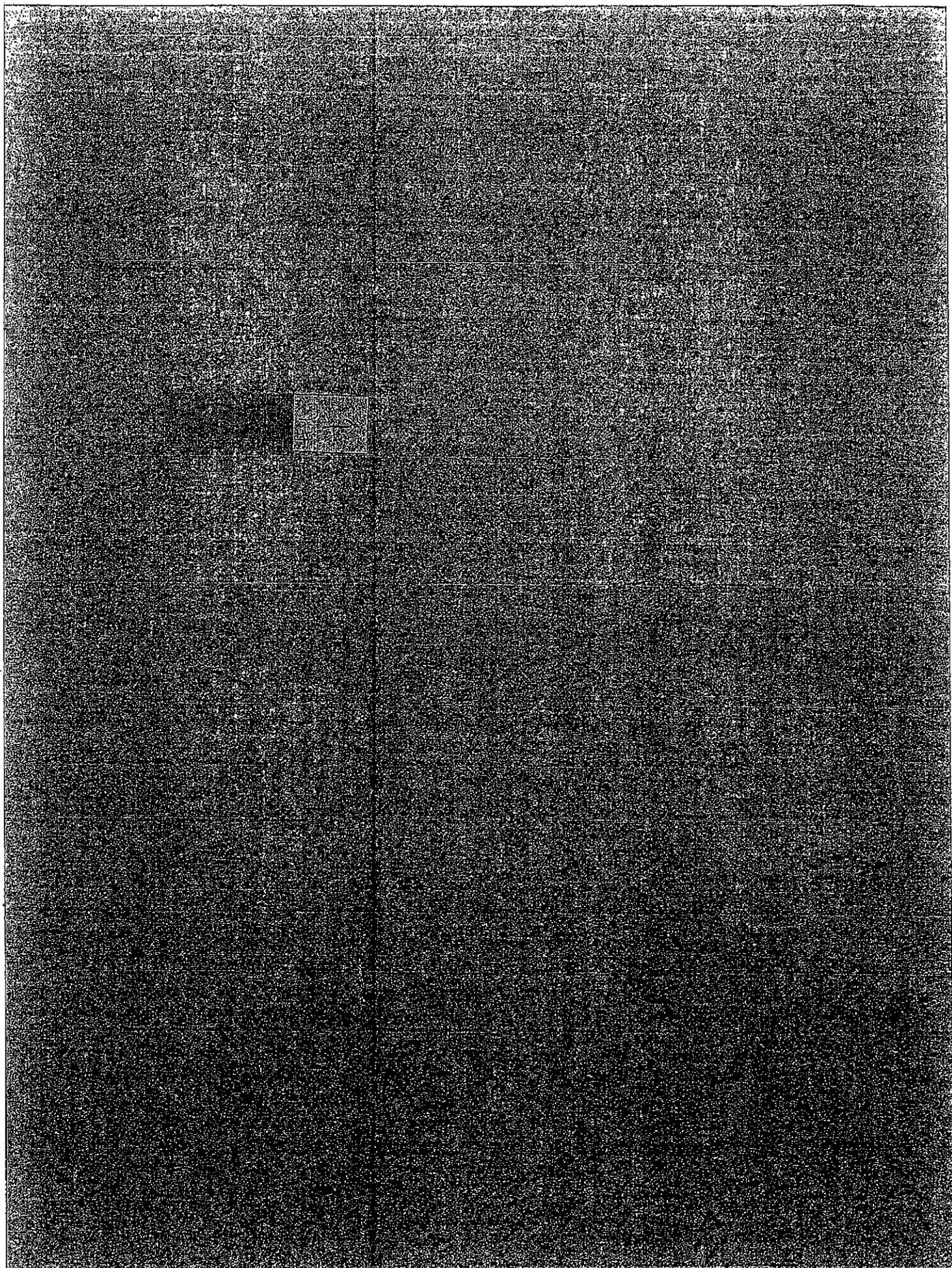
EXHIBIT C



Ms. Ceja's vehicle approximate location.



Approximate location of security camera -



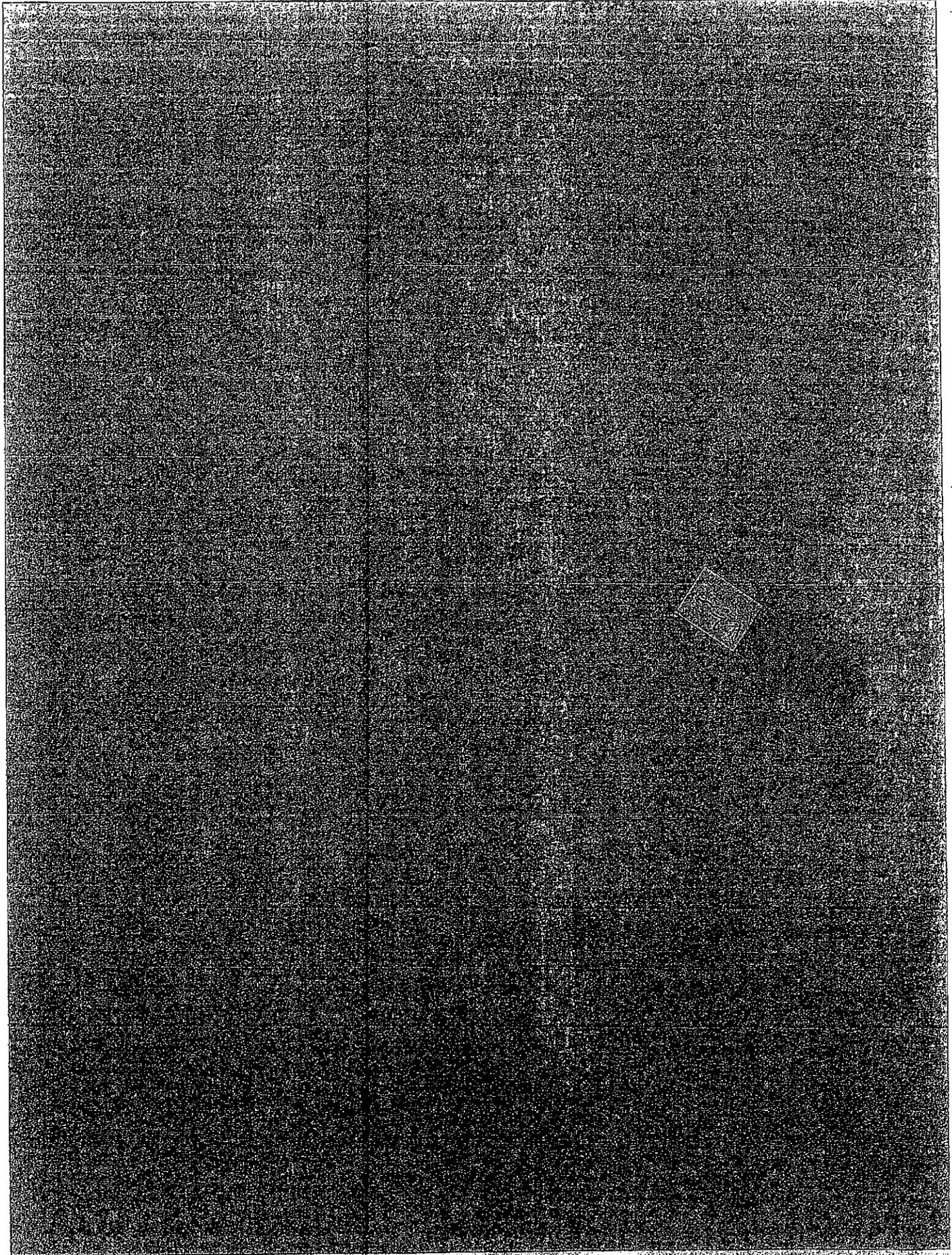
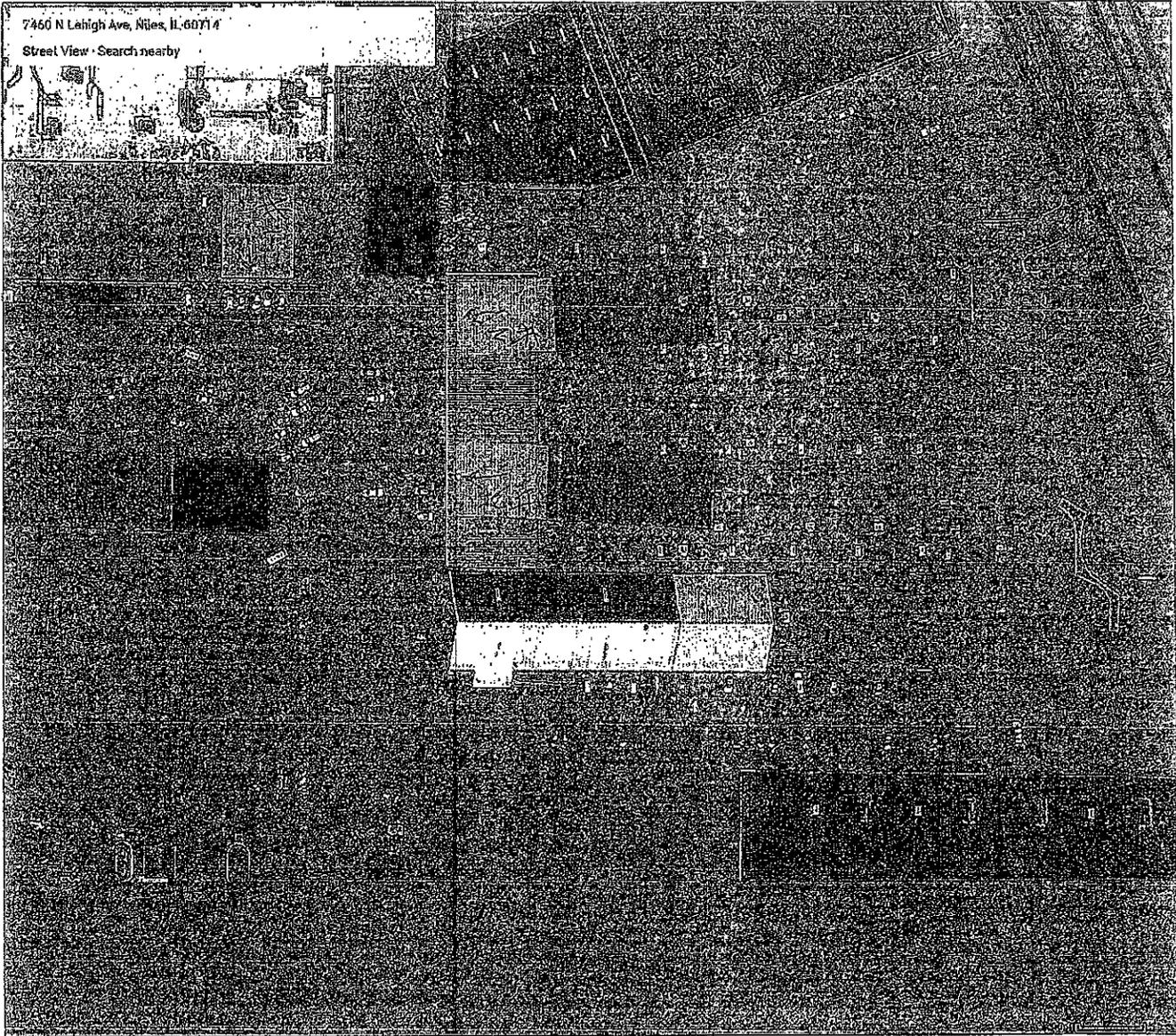
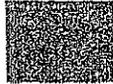
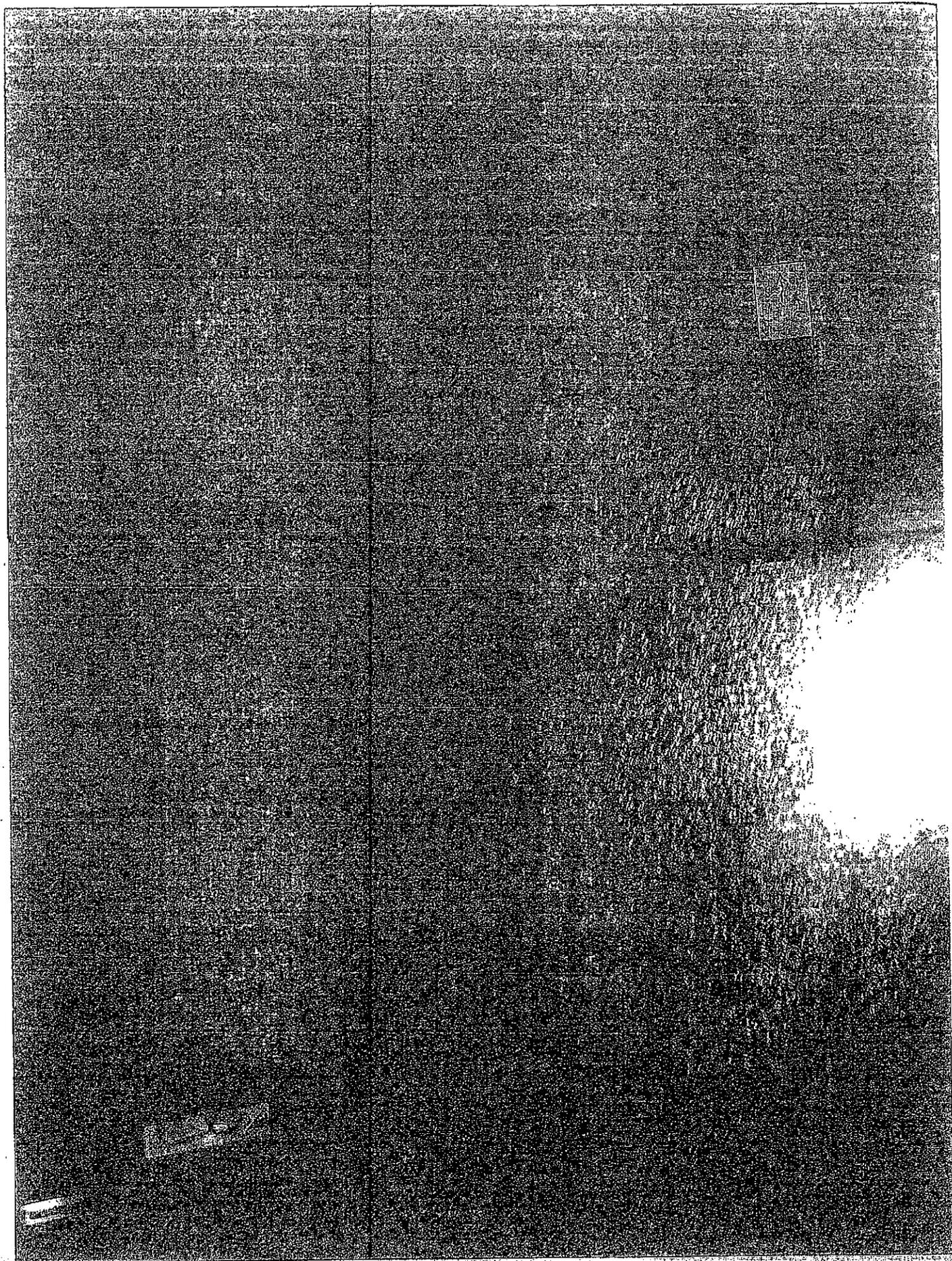
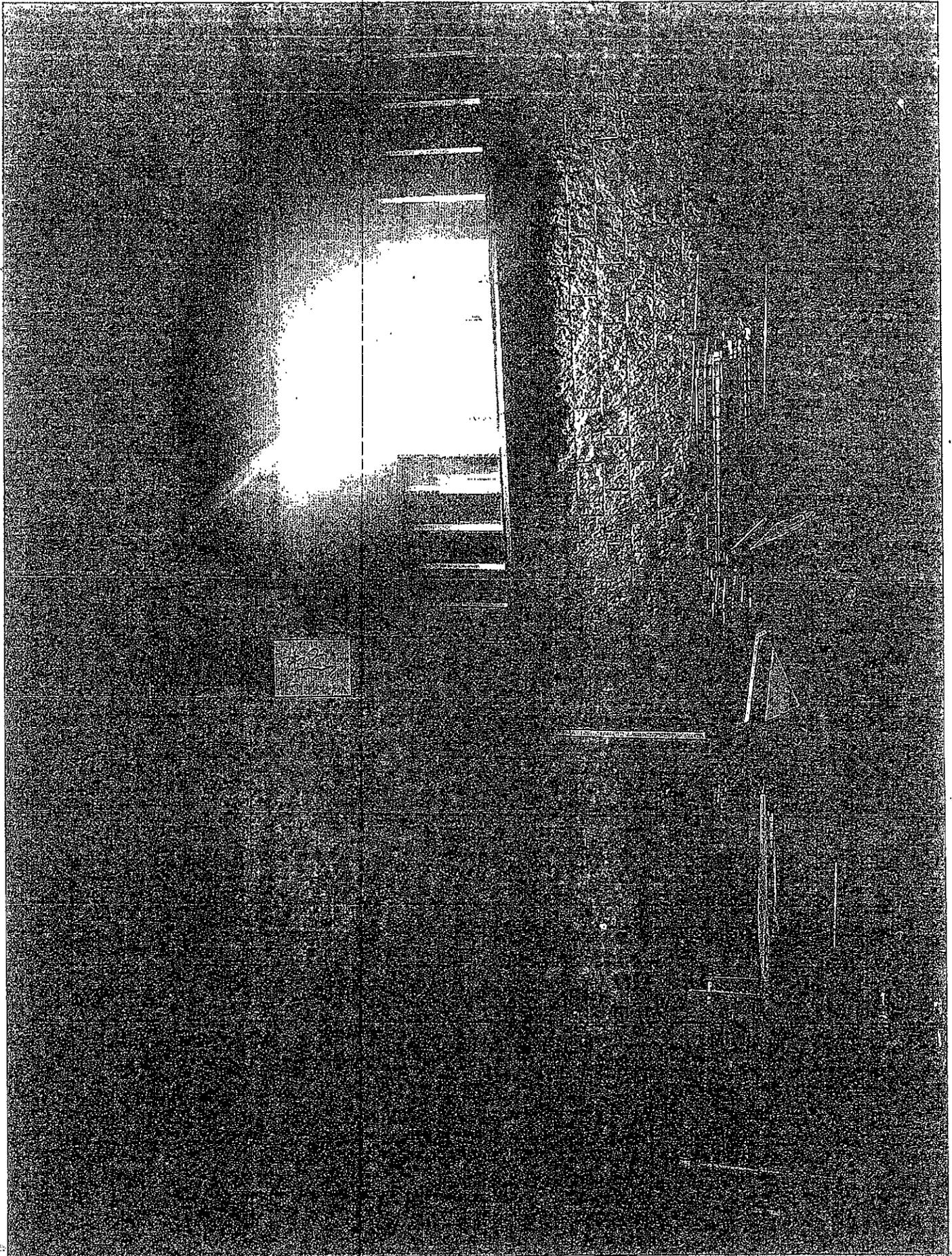


EXHIBIT D



-  Approximate location of Mrs. Ceja's vehicle.
-  Approximate location of Mr. Ibarra's car.
-  Approximate location of security cameras.





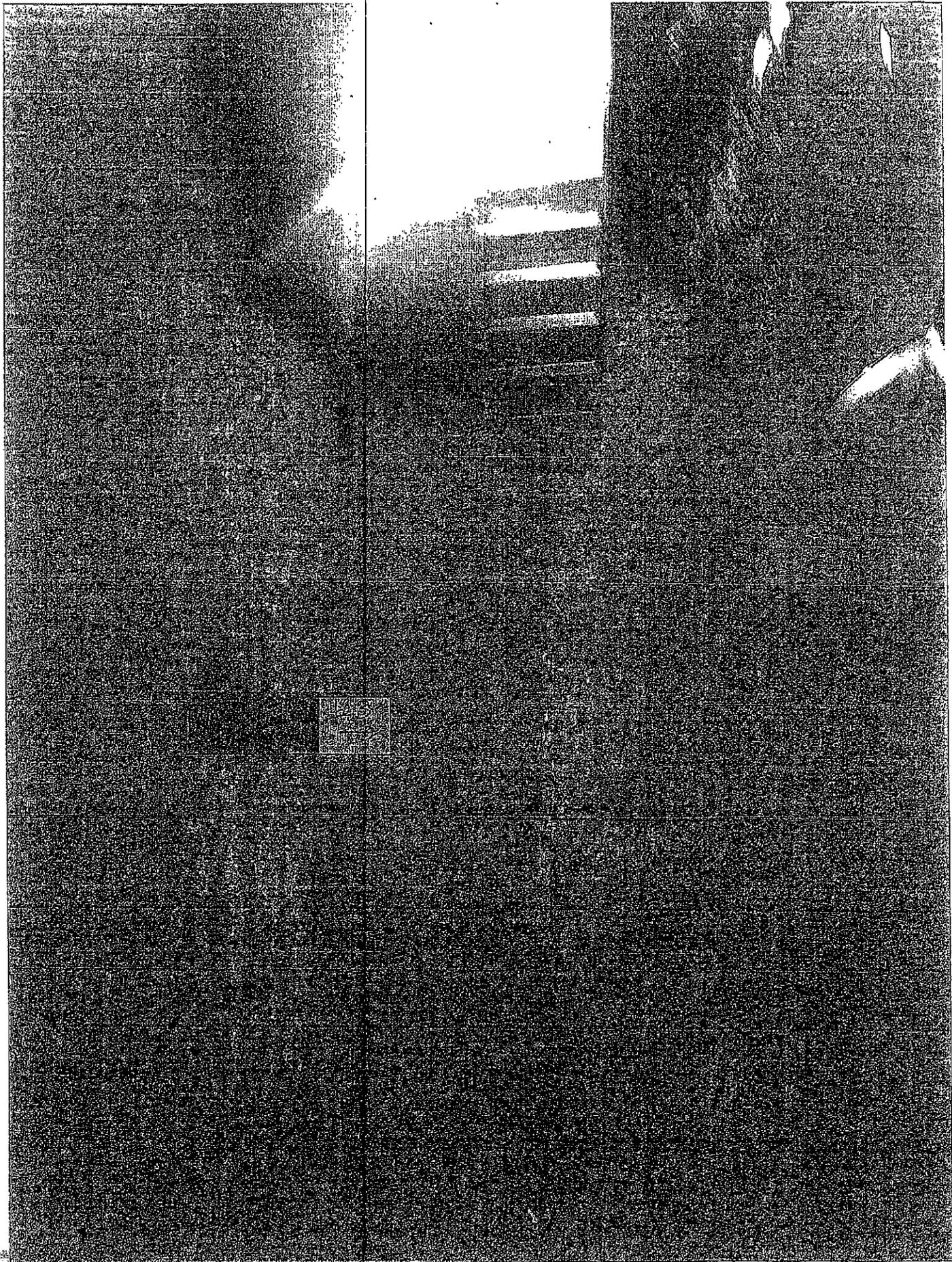


EXHIBIT E

From Alberto
Espinoza

Can you forward Alberto texts?

X k no t puedo sacar de mi mente
estabas tan Linda anoche k como m
gusto verte con ese vestido jajsja



Hi Darron how you doing? can I take
money orders to Waukegan branch
for the loan or will you like me to send
it to main office?



EXHIBIT F

WORKERS' LAW OFFICE, PC

401 S. LASALLE STREET · SUITE 1400 · CHICAGO · ILLINOIS · 60605 · PHONE 312-765-9121 · FAX 312-920-2207

October 27, 2014

Via Certified U.S. Mail

MVP Workforce, LLC d/b/a MVP Workforce
c/o Joel Shapiro, Registered Agent
150 S. Wacker Dr., Ste. 1500
Chicago, IL 60606

Re: *Ceja, et al. v. Personnel Staffing Group, LLC d/b/a Most Valuable Personnel
d/b/a MVP, et al.* - CORRECTED

Dear Mr. Shapiro:

Our office has filed with the EEOC a charge of discrimination based on sex against Personnel Staffing Group, LLC ("PSG") and MVP Workforce, LLC ("MVP Workforce") on behalf of Ms. Ceja alleging pervasive sexual harassment by van drivers employed by PSG and/or MVP Workforce.

For the period of two (2) years prior to today, we require that MVP Workforce preserve the following records:

- All email communication to or from any PSG employee or agent to or from Ms. Ceja;
- All email communication to or from any PSG employee or agent to or from any of PSG's van drivers, including but not limited to Esteban Ibarra and Alberto Ibarra;
- Any documents relating to any allegations of sexual harassment against any employee or agent of PSG.

For the period of sixty (60) days prior to today, we require that MVP Workforce preserve the following records:

- The cell phone provided to Ms. Ceja by PSG or MVP Workforce, LLC ("Ceja cell"). The phone number of the Ceja cell is believed to be [REDACTED];
- All texts sent to or from the Ceja cell;
- All phone logs for the Ceja cell;
- The cell phone of Mr. David Barnett ("David Barnett cell"). The phone number of the David Barnett cell is believed to be 847-533-9287;
- All texts sent to or from the cell phone of Mr. David Barnett;
- All voicemails received on the David Barnett cell;
- All phone logs for the David Barnett cell;

- o The cell phone of Mr. Daniel Barnett ("Daniel Barnett cell"). The phone number of the Daniel Barnett cell is unknown to the charging party at this time;
- o All texts sent to or from the cell phone of Mr. Daniel Barnett;
- o All voicemails received on the Daniel Barnett cell;
- o All phone logs for the Daniel Barnett cell;

- o The cell phone of Mr. Billy Platt ("Platt cell"). The phone number of the Platt cell is unknown to the charging party at this time;
- o All texts sent to or from the cell phone of Mr. Platt;
- o All voicemails received on the Platt cell;
- o All phone logs for the Platt cell;

- o The cell phones of any and all van drivers employed by PSG and/or MVP Workforce, LLC ("Van Driver cells"), including but not limited to Alberto Ibarra and Esteban Ibarra. The phone numbers of the Van Driver cells are unknown to the charging party at this time;
- o All texts sent to or from the cell phone of the Van Driver cells.
- o All voicemails received on the Van Driver cells;
- o All phone logs for the Van Driver cells.

We believe this information will be relevant in the investigation of this charge of discrimination and potential lawsuit. While you may dispute the relevance, until such question is resolved, PSG has an obligation to preserve such records. Feel free to contact me or have your counsel contact me should you have any questions regarding this request.

Sincerely,



Christopher J. Williams

CJW/ms

cc: Elliot Richardson, Korey Richardson, LLC, *via email*

EXHIBIT

Z

Rosa Ceja

Rosa Ceja Timeline Recent


 Albar de la sañte rosalia Isplio mexico dif
 ★★★★★
 - Vale hacer 5 horas aqui para que se
 dignen a (. nombre de nuestro santaria.)


 SANTA MUERTE
 ★★★★★
 - Vale hacer 5 horas aqui para que se
 dignen a (. nombre de nuestro santaria.)



RECENT ACTIVITY


 Rosa followed Lupita Ceja (Moxila)


 Rosa likes JoyPars.

English (US) Privacy Terms Cookies Help
 Facebook © 2014

Earlier in 2014

PHOTOS 2014


 What's happening...


 Rosa Ceja shared her post — with Tinia Matias Robles and 25 others.
 December 16 at 8:23pm · A

Si hay (most) visible Personal) les debe haber han sido victimas De abuso por favor manden un mensaje hay personas presas en priso las injustas Por favor comparten

Like · Comment · Share
 3 people like this.


 Jorge Pelaez De que se trata Rosa Ceja
 December 16 at 7:16pm · Like


 Rosa Ceja in box Jorge Pelaez
 December 15 at 7:42pm · Like


 Alin Coffin What's all about?
 December 16 at 10:36pm · Like

Rosa Ceja People sometimes don't get paid or if they report that they have been sexually abused they don't care.
 December 17 at 1:35am · Like · 1


 Jorge Albaranz Rosy aqui ando todavia no te olvidas de mi
 December 17 at 7:11am · Like


 Write a comment...


 Karti G added 2 new photos.

HIGHLIGHTS

Recent
 2014
 2013
 2012
 2011
 Born



Verizon Wireless
 verizonwireless.com
 Get your next phone - FREE
 Powered by the Verizon
 Network (2-yr activation req'd)

YOUR APPS
 RECOMMENDED SITES
 MORE

Israel Lopez likes Cheva Sanchez's photo.
 Chelsea Castle likes Brittany Madala's life event.
 Enrique El Gavilan Garcia Este año nos dao cross domias, cosas breves deo lo. — with Arceley Alves and 49 others.

Sofia Cauliflower commented on Brang home Dan Nestrom's post.
 Melissa Lopez likes Isel Blanco.

Isral Lopez.

Enrique El Gavil.

GROUP CONVERSATIONS
 La Clara, Nery, 28 others

Rosa Ceja shared her post -- with Tinita Matias Robles and 28 others.
December 16 at 6:23pm

Rosa Ceja

If any MVPs (Most Valuable Personnel) are owed hours, have been victims of abuse, please send me a message. There are people interested in ending the injustices they are doing.
Please share

Comments [sic]:

Jorge Pelaez What's this about Rosa Ceja

Rosa Ceja Private message (inbox) Jorge Pelaez

Allin Coffin Whats all about?

Rosa Ceja People sometimes don't get paid or if they report that they have been sexually abused they don't care.

Jorge Albarran Rosy I'm still here don't forget about me



Exhibit B

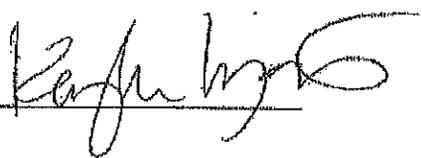
Certificate of Accuracy

I certify that this document was translated from Spanish to English by a translator working for Multilingual Connections. I believe the English translation to be an accurate and complete translation of the original.


Stefania Dalgler
Senior Translations Manager
Multilingual Connections, LLC

12/31/14
Date

Subscribed and sworn to before me
this 31 day of DEC 2014
at Chicago, County of Cook, State of Illinois.

Notary Public 



EXHIBIT

AA

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 13**

**PERSONNEL STAFFING GROUP, LLC D/B/A
MOST VALUABLE PERSONNEL**

and

Case 13-CA-155513

ROSA CEJA, an Individual

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by Rosa Ceja, an Individual (Charging Party). It is issued pursuant to Section 10(b) of the National Labor Relations Act (the Act), 29 U.S.C. § 151 et seq., and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that Personnel Staffing Group, LLC d/b/a MVP (Respondent) has violated the Act as described below.

I

The charge in this proceeding was filed by the Charging Party on July 7, 2015, and a copy was served on Respondent by U.S. mail on July 8, 2015.

II

(a) At all material times, Respondent, a Florida limited liability company, with its principal place of business in Northbrook, Illinois, has been a temporary labor service agency that provides personnel services to third-party clients.

(b) During the past calendar year, a representative period, in conducting its business operations described in paragraph II(a), Respondent performed services valued in excess of \$50,000 in States other than the State of Illinois.

(c) At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

III

(a) About January 14, 2015, Respondent filed a Complaint at Law in the Circuit Court of Nineteenth Judicial Circuit Lake County, Illinois, Case No. 15 L 31, against its employee, the Charging Party.

(b) From about January 14, 2015, to about July 29, 2015, Respondent maintained its lawsuit described above in paragraph III(a).

(c) About August 28, 2015, in furtherance of the lawsuit described above in paragraph III(a), Respondent filed a Notice of Appeal in the Appellate Court of Illinois, Second Judicial District, in Case No. 2-15-0887, appealing the trial court's dismissal of the lawsuit.

(d) From about August 28, 2015, to about February 24, 2016, Respondent maintained its appeal described above in paragraph III(c).

(e) The lawsuit described above in paragraph III(a), which alleges a state claim of defamation, lacked a reasonable basis and was filed and maintained by Respondent with a motive to retaliate against the Charging Party for activity protected by Section 7 of the Act, including Charging Party's Facebook messages posted about December 16, 2014.

(f) The state claim for defamation described above in paragraph III(a) is preempted.

IV

(a) About April 14, 2015, pursuant to the litigation of the lawsuit described in paragraph III(a), Respondent issued discovery requests upon Charging Party, including interrogatories and requests for production of documents.

(b) About June 16, 2015, Respondent sought to compel Charging Party to respond to the discovery requests described above in paragraph IV(a) by filing a Motion to Compel Defendant to Provide Complete and Proper Responses and to Strike Improper Objections.

(c) The interrogatories and requests for production of documents described in paragraph IV(a) were broad enough to include information related to protected Section 7 communications, and the Respondent's need for the information did not justify the requests' significant impingement on employees' Section 7 confidentiality interests.

V

By the conduct described above in paragraphs III and IV, Respondent has been interfering with, restraining, and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

VI

The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

As part of the remedy for Respondent's unfair labor practices alleged above in paragraphs III and IV the General Counsel seeks an Order requiring Respondent to post and electronically distribute notices in Spanish in addition to English.

As part of the remedy for the unfair labor practices alleged above in paragraph III and IV, the General Counsel seeks an Order requiring Respondent to reimburse the Charging Party, with interest, for all reasonable legal fees and expenses incurred in the defense of Case No. 15 L 31 and Case No. 2-15-0887. The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before April 7, 2016, or postmarked on or before April 6, 2016**. Respondent should file an original and four copies of the answer with this office and serve a copy of the answer on each of the other parties.

An answer may also be filed electronically through the Agency's website. To file electronically, go to www.nlr.gov, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on **July 18, 2016, 11:00 a.m.** at **219 South Dearborn Street, Suite 808, Chicago, Illinois 60604**, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated at Chicago, Illinois this 24th day of March 2016.

/s/ Daniel N. Nelson

Daniel N. Nelson, Acting Regional Director
National Labor Relations Board
Region 13
Dirksen Federal Building
219 South Dearborn Street, Suite 808
Chicago, IL 60604-1443

Attachments

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 13**

**PERSONNEL STAFFING GROUP, LLC D/B/A
MOST VALUABLE PERSONNEL**

and

Case 13-CA-155513

ROSA CEJA, an Individual

AFFIDAVIT OF SERVICE OF: COMPLAINT AND NOTICE OF HEARING (with forms NLRB-4338 and NLRB-4668 attached)

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **March 24, 2016**, I served the above-entitled document(s) by **certified or regular mail**, as noted below, upon the following persons, addressed to them at the following addresses:

Daniel Barnett
Personnel Staffing Group, LLC d/b/a MVP
666 Dundee Road, Suite 201
Northbrook, IL 60062-2742

**CERTIFIED MAIL, RETURN RECEIPT
REQUESTED**

Carter Korey
Korey Richardson LLC
20 S Clark Street, Suite 500
Chicago, IL 60603-1832

REGULAR MAIL

Elliot Richardson
Korey Richardson LLC
20 S Clark Street, Suite 500
Chicago, IL 60603-1832

REGULAR MAIL

Christopher J. Williams , Esq.
WORKERS LAW OFFICE PC
53 W. Jackson Blvd.
Suite 701
Chicago, IL 60604

REGULAR MAIL

Rosa Ceja
53 W Jackson Blvd Ste 701
Chicago, IL 60604-3480

CERTIFIED MAIL

March 24, 2016

Denise Gatsoudis, Designated Agent of
NLRB

Date

Name

/s/ Denise Gatsoudis

Signature

EXHIBIT

BB

**IN THE UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 13**

PERSONNEL STAFFING GROUP, LLC
d/b/a MOST VALUABLE PERSONNEL

Case 13-CA-155513

and

ROSA CEJA, an individual

**PERSONNEL STAFFING GROUP, LLC'S ANSWER AND
AFFIRMATIVE DEFENSES TO THE COMPLAINT**

Respondent, Personnel Staffing Group, LLC d/b/a Most Valuable Personnel ("Respondent" and/or "MVP"), by and through its undersigned attorneys, and for its Answer and Affirmative Defenses to the Complaint and Notice of Hearing ("Complaint") filed by the Acting Regional Director of the National Labor Relations Board, Region 13 ("NLRB"), states as follows:

ANSWER

Paragraph I: Respondent admits that the Charge Against Employer was filed on July 7, 2015 and was served on Respondent, but denies the remaining allegations in Paragraph I.

Paragraph II(a): Respondent admits the allegations in Paragraph II(a).

Paragraph II(b): Respondent admits the allegations in Paragraph II(b).

Paragraph II(c): Respondent admits the allegations in Paragraph II(c).

Paragraph III(a): Respondent admits that it filed a complaint in the Circuit Court of Lake County, Illinois against the Charging Party, but denies that Charging Party was its employee and the remaining allegations in Paragraph III(a).

Paragraph III(b): Respondent admits the allegations in Paragraph III(b).

Paragraph III(c): Respondent admits the allegations in Paragraph III(c).

Paragraph III(d): Respondent admits the allegations in Paragraph III(d).

Paragraph III(e): Respondent denies the allegations in Paragraph III(e).

Paragraph III(f): Respondent denies the allegations in Paragraph III(f).

Paragraph IV(a): Respondent admits the allegations in Paragraph IV(a).

Paragraph IV(b): Respondent admits the allegations in Paragraph IV(b).

Paragraph IV(c): Respondent denies the allegations in Paragraph IV(c), and further states that this allegation is outside the scope of the Charging Party's Charge against Employer.

Paragraph V: Respondent denies the allegations in Paragraph V.

Paragraph VI: Respondent denies the allegations in Paragraph VI.

AFFIRMATIVE DEFENSES

For its affirmative defenses for the above-styled Complaint, Respondent alleges as follows:

1. The allegations of the Complaint do not support recovery under the National Labor Relations Act because some or all of them fail to state a claim.

2. Some or all of the allegations in the Complaint fall outside the scope of the underlying Charge Against Employer.

3. Complainant has not satisfied the administrative pre-requisite to bringing some or all of the alleged actions.

4. The Complaint is so vague or lacking in detail as to some or all of the allegations that Respondent is unable to understand the charges and issues to be considered at trial.

5. The Charging Party was not an employee of Respondent.

6. At the time the Charging Party resigned her employment with Respondent, she was a Section 2(11) supervisor and accordingly, the actions complained of are not protected by the Act.

7. Respondent had a good faith and reasonable basis for filing the action in the Circuit Court of Lake County, Illinois, and did not file the action in retaliation for engaging in protected concerted activities.

8. The filing of Respondent's action in the Circuit Court of Lake County, Illinois is protected by the First Amendment.

9. The Charging Party's actions were not in the context of a labor dispute, nor did they touch on Section 7 concerns, regardless, Charging Party acted with malicious intent and/or reckless indifference to Respondent's rights, so as to fall outside the scope of the Act.

10. Charging Party did not engage in protected concerted activity.

11. Respondent's action in the Circuit Court of Lake County, Illinois does not fall within the confines of the Act; nevertheless, it would be subject to the *Garmon* exception to the preemption doctrine.

12. Respondent's discovery requests did not infringe on protected activities.

13. Respondent's discovery requests were relevant, issued in good faith and without an illegal objective, and Respondent's interest in discovery outweighed Section 7 confidentiality concerns.

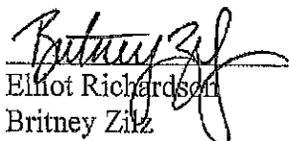
14. The remedies requested by the NLRB in Paragraph 6 are improper, impermissible, and impermissibly restrictive.

15. Respondent denies all allegations and legal conclusions in the Complaint not expressly admitted.

16. Respondent reserves the right to assert additional affirmative defenses in this matter prior to trial.

Dated: April 7, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Britney Zilz", is written over a horizontal line.

Elliot Richardson
Britney Zilz
KOREY RICHARDSON LLC
20 S. Clark St., Suite 500
Chicago, Illinois 60603
(312) 372-7075

Attorneys for Personnel Staffing Group, LLC
d/b/a Most Valuable Personnel

**IN THE UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 13**

PERSONNEL STAFFING GROUP, LLC
d/b/a MOST VALUABLE PERSONNEL

Case 13-CA-155513

and

ROSA CEJA, an individual

CERTIFICATE OF SERVICE

I, **Britney Zilz**, an attorney, certify that a copy of **Personnel Staffing Group, LLC's Answer and Affirmative Defenses to the Complaint** was filed with the National Labor Relations Board, Region 12, at 219 South Dearborn Street, Chicago Illinois 60604 on April 7, 2016, and that a copy of the foregoing Answer and Affirmative Defenses to the Complaint was sent to the undersigned via U.S. Mail on or before 5:00 p.m. on April 7, 2016:

Daniel L. Nelson, Acting Regional Director
National Labor Relations Board, Region 13
Dirksen Federal Building
219 South Dearborn, Suite 808
Chicago, Illinois 60604

Christopher Williams
Workers' Law Office, P.C.
53 W. Jackson Blvd., Suite 701
Chicago, Illinois 60604-3480

Dated: April 7, 2016



Britney Zilz
Korey Richardson LLC
20 S. Clark St., Suite 500
Chicago, Illinois 60603
bzilz@koreyrichardsonlaw.com

RECEIVED
NATIONAL LABOR
RELATIONS BOARD
2016 APR -7 P 3:48
MILWAUKEE
CHICAGO, IL

EXHIBIT

CC

From: Rosa Ceja [RCeja@mvpstaffing.com]
Sent: Tuesday, September 16, 2014 3:15 PM
To: 'Kevin Goss'
Subject: FW: Hans Wirth

Kevin,

Is Hans going to be temp to hire or direct Hire?

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Fax : 705 456 3434
E-Fax :847 725 0037

From: Kevin Goss [mailto:kgoss@specialtyprintcomm.com]
Sent: Tuesday, September 16, 2014 3:05 PM
To: Rosa Ceja
Cc: Sam Barone; Dan Sims
Subject: Re: Hans Wirth

10am please.

He can come to 7420 Lehigh and come to the main entrance.

Thanks,

Kevin Goss
Specialty Print Communications
224-203-0153

On Sep 16, 2014, at 2:57 PM, "Rosa Ceja" <RCeja@psgwork.com> wrote:

Hi Kevin,

Hans can interview on Thursday morning, is there a time that works for them?

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Cell: 773 444 9963
Fax : 705 456 3434

E-Fax :847 725 0037

From: Kevin Goss [<mailto:kgoss@specialtyprintcomm.com>]
Sent: Tuesday, September 16, 2014 2:36 PM
To: Dan Sims; Rosa Ceja
Subject: RE: Hans Wirth

Hi Rosa,

Did you give Hans my contact information?

Thanks,

<Image001.jpg>

Kevin Goss
847-581-7621

From: Dan Sims
Sent: Monday, September 15, 2014 1:03 PM
To: Rosa Ceja; Kevin Goss
Subject: Re: Hans Wirth

He will interview with Kevin Goss asap.

Thanks,



Daniel Sims
VP Lettershop Services
SPC
847-814-8423 C

On Sep 15, 2014, at 1:00 PM, "Rosa Ceja" <RCeja@psgwork.com> wrote:

Dan,

Please let me know what you think.

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Fax : 705 456 3434
E-Fax :847 725 0037

From: Rosa Ceja <RCeja@mvpstaffing.com>
Sent: Tuesday, September 16, 2014 6:24 PM
To: Billy Platt
Cc: Lisette Robles; Alison Chalmers; Sam Barone; Nicole Levin
Subject: RE: SPC (Postal assistant)

Billy,

Hans, Wirth have a interview with Kevin Gas at SPC 7420 Lehigh this Thursday at 8:00 am. If everything work out Hans, Wirth will be direct Hire.

Thank you

Rosa Ceja
7514 W North Avenue
Elmwood Park, IL 60707
Cell: 847 344 2833
Office: 708 456 3400 Ext 4510
Fax : 705 456 3434
E-Fax :847 725 0037

From: Billy Platt
Sent: Tuesday, September 16, 2014 4:04 PM
To: Rosa Ceja
Cc: Lisette Robles; Alison Chalmers; Sam Barone; Nicole Levin
Subject: SPC (Postal assistant)
Importance: High

Rosa,

Please get back to me on whether or not the postal assistant job is a temp to hire or a direct hire. MVP360 and Alison need to know this ASAP. See what day works for an interview, but it needs to be Thursday or after, just not tomorrow.

If you have any questions, don't hesitate to ask.

Thank you,

Billy Platt
Personnel Staffing Group
Cell# 847-687-4867

EXHIBIT

DD

Billy Platt

From: Rosa Ceja
Sent: Wednesday, October 15, 2014 10:14 PM
To: Billy Platt
Subject: RE: MISSING HRS

Billy,

That's not what Danny told me. But as soon as I'm done confirming the hrs I will drop off the computer to you.

Thank you

Rosa Ceja

7514 W North Avenue
Elmwood Park, IL 60707
Office: 708 456 3400 Ext 4510
Cell: 773 956 4003
Fax : 705 456 3434
E-Fax :847 725 0037

From: Billy Platt
Sent: Wednesday, October 15, 2014 10:10 PM
To: Rosa Ceja
Subject: Re: MISSING HRS

So you did not drop off the computer or your cell phone?

Billy Platt
PSG

----- Reply message -----

From: "Rosa Ceja" <RCeja@psgwork.com>
To: "Billy Platt" <BPlatt@psgwork.com>
Subject: MISSING HRS
Date: Wed, Oct 15, 2014 10:04 PM

Billy,

I have been working from home on the missing hrs and I'm not done yet.
About my hrs tomorrow someone is going to contact you because I don't feel safe

Thank you

Always worked 3rd shift.

From: Billy Platt
Sent: Wednesday, October 15, 2014 9:51 PM

To: Rosa Ceja
Subject: Re: MISSING HRS

Rosa,

You did receive my email today about your hours, right?

Why did you not report to the branch this evening?

Thank you,

Billy Platt
PSG

----- Reply message -----

From: "Rosa Ceja" <RCEja@psgwork.com>
To: "Billy Platt" <BPlatt@psgwork.com>
Cc: "Marcial Ramos" <MRamos@psgwork.com>
Subject: MISSING HRS
Date: Wed, Oct 15, 2014 9:44 PM

Hi Billy,

This people are missing hrs in novatime for some reason navatime stop working. Whit out novatime I cant see the hrs they clock in.

Jose Mreno MOR7C4/321068 WORKED 3RD SHIFT

10/07/14 11pm to 7am
10/08/14 11pm to 7am
10/09/14 11pm to 7am
10/10/14 11pm to 7am
10/11/14 11pm to 7am

ADAME, ISABEL ADA635 1ST SHIFT

10/06/14 7am to 3pm
10/07/14 7am to 3pm
10/08/14 7am to 3pm
10/09/14 7am to 3pm
10/10/14 7am to 3pm
10/11/14 7am to 3pm
10/12/14 7am to 3pm

SAUL JOSE CEJA GONZALEZ 341247/CEJ225 2ND SHIFT

10/11/14 3pm to 11pm
10/12/14 3pm to 11pm

this people are going to get pay 4hrs Perdo 3rd shift supervisor send them home 10/8/14

Teresa, Jaime 111641
Araceli Manjarrez 359535
Corario Walke 370986