

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD

TEAMSTERS LOCAL UNION NO. 455 (CARGILL  
MEAT SOLUTIONS CORPORATION)

and

Case 27-CB-168294

SAID ALI, AN INDIVIDUAL

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MOTION TO TRANSFER PROCEEDING TO THE BOARD AND  
MOTION FOR DEFAULT JUDGMENT

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Counsel for the General Counsel of the National Labor Relations Board files this Motion to Transfer Proceeding to the National Labor Relations Board (the Board) and Motion for Default Judgment pursuant to Sections 102.24 and 102.50 of the Board's Rules and Regulations. Teamsters Local Union No. 455 (Respondent) has failed to file an Answer to the Complaint issued by the Regional Director for Region 27 in the required timeframe, entailing General Counsel to default judgment. In support of said motions, Counsel for the General Counsel respectfully submits the following:

1. The charge in this proceeding was filed by Said Ali (Charging Party) on January 25, 2016, and a copy was served on Respondent by U.S. mail on the same day. Copies of the charge and the affidavit of service are attached as Exhibit A.

2. The first amended charge in this proceeding was filed by the Charging Party on April 28, 2016, and a copy was served on Respondent by U.S. mail on the same day. Copies of the first amended charge and the affidavit of service are attached as Exhibit B.

3. On May 24, 2016, the Regional Director for Region 27 issued and served upon Respondent by certified mail a Complaint and Notice of Hearing. Copies of the Complaint and the affidavit of service are attached as Exhibit C. Copies of the certified mail receipt and confirmation of delivery from USPS Tracking are attached as Exhibit D.

4. The Answer to the Complaint was due on June 7, 2016. Respondent failed to file an Answer.

5. On June 8, 2016, the Regional Attorney for Region 27 wrote and served upon Respondent a letter by certified mail, advising that Respondent had not filed an Answer to the Complaint. Respondent was further advised that unless it filed an appropriate answer by June 22, 2016, a Motion for Summary Judgment would be sought. Copies of the Regional Attorney's letter, the certified mail receipt, and the return receipt card are attached as Exhibit E.

6. No Answer to the Complaint has been filed to date by Respondent, nor has Respondent filed any document purporting to be an appropriate Answer.

7 In the Complaint and Notice of Hearing served upon Respondent, as noted above, Respondent was advised as follows:

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 **be received by this office on or before June 7, 2016, or postmarked on or before June 6, 2016.** 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.

8. Section 102.20 of the Board's Rules and Regulations provides, *inter alia*: "All allegations in the complaint, if no answer is filed, shall be deemed to be admitted to be true and shall be so found by the Board , " Because no Answer has been filed to the Complaint, all of the allegations of the Complaint should be deemed to be admitted and found to be true by the Board. *Professional Diversity Network, Inc.*, 364 NLRB No. 19, slip op. (2016).

**WHEREFORE**, Counsel for the General Counsel respectfully moves:

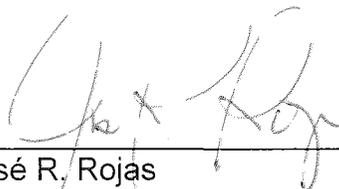
1 That this proceeding and motions be transferred to the Board and ruled on immediately so that in the event they are granted, the necessity and expense of a hearing involving Respondent will be obviated.

2. That all allegations of the Complaint be deemed to be admitted to be true, and so found by the Board, and that Respondent be found by the Board to have violated

Section 8(b)(1)(A) of the National Labor Relations Act, without taking evidence in support of the Complaint.

3. That the Board issue a Decision containing findings of fact, conclusions of law, and an Order, all consistent with the allegations in the Complaint against Respondent and the prayer for relief set forth therein.

Respectfully submitted this 23<sup>rd</sup> day of June 2016.



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José R. Rojas  
Counsel for the General Counsel  
National Labor Relations Board  
Region 27  
Building Rogers Federal Office Building  
1961 Stout Street, Suite 13-103  
Denver, CO 80294

# EXHIBIT A

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

DO NOT WRITE IN THIS SPACE	
Case 27-CB-168294	Date Filed 1/25/2016

INSTRUCTIONS: File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT

a. Name Teamsters Local Union No. 455	b. Union Representative to contact Nicardo Roberto
c. Address (Street, city, state, and ZIP code) 10 Lakeside Lane, #3A, Denver, CO 80212 1025 Burlington Ave, Fort Morgan, CO 80701	d. Tel. No. (303) 458-1600 e. Cell No. f. Fax No. g. e-Mail

h. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) (1)(a) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the last six months, my union, Teamsters Local Union No. 455, has breached the duty of fair representation by

- 1) Refusing to file and process grievances on behalf of Somali and Muslim employees; and
- 2) Retaliating against Somali and Muslim employees for filing a charge with the NLRB regarding the union's breach of the duty of fair representation (charges filed in May and July of 2015); and
- 3) Retaliation against Somali and Muslim employees for waging a Beck objection and requesting lobbying fees to be returned.

3. Name of Employer Cargill Meat Solutions	4a. Tel. No. (970) 867-8223	b. Cell No.
	c. Fax No.	d. e-Mail

5. Location of plant involved (street, city, state and ZIP code) 1505 E Burlington Ave, Fort Morgan, CO 80701	6. Employer representative to contact
--	---------------------------------------

7. Type of establishment (factory, mine, wholesaler, etc.) Meat Processing Plant	8. Identify principal product or service Beef Processing	9. Number of workers employed 500 or more
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10. Full name of party filing charge Said Ali on behalf of himself and other similarly situated individuals	11a. Tel. No. (303) 578-4400	b. Cell No.
	c. Fax No. (303) 578-4401	d. e-Mail lw@rmlawyers.com
11. Address of party filing charge (street, city, state and ZIP code.) Rathod Mohamedbhai LLC, 2701 Lawrence St, Ste 100, Denver, CO 80205		

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

By Laura Wolf  
(signature of representative or person making charge) (Printtype name and title or office, if any)

Address 2701 Lawrence Street, Ste 100 Denver, CO 80205 (date) 1/25/16

Tel. No. (303) 578-4400
Cell No. (520) 664-7647
Fax No. (303) 578-4401
e-Mail lw@rmlawyers.com

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.

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

**TEAMSTERS LOCAL UNION, NO. 455**  
**(CARGILL MEAT SOLUTIONS)**

Charged Party

and

**RATHOD MOHAMEDBHAI, LLC**

Charging Party

**Case 27-CB-168294**

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST LABOR ORGANIZATION**

I, the undersigned employee of the National Labor Relations Board, state under oath that on January 25, 2016, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

Nicardo Roberto  
Teamsters Local Union No. 455  
10 Lakeside Ln.  
Ste. 3A  
Denver, CO 80212-7430

Teamsters Local Union, No. 455  
1025 Burlington Ave.  
Fort Morgan, CO 80701

January 25, 2016

\_\_\_\_\_  
Date

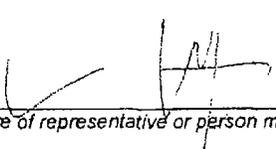
Scott D. Young,  
Designated Agent of NLRB

\_\_\_\_\_  
Name

/s/ Scott D. Young

\_\_\_\_\_  
Signature

# **EXHIBIT B**

UNITED STATES OF AMERICA		DO NOT WRITE IN THIS SPACE	
NATIONAL LABOR RELATIONS BOARD		Case	Date filed
FIRST AMENDED CHARGE AGAINST LABOR ORGANIZATION OR ITS AGENTS		27-CB-168294	4/28/2016
INSTRUCTIONS: File an original of this charge with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.			
1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT			
a. Name Teamsters Local Union No. 455		b. Union Representative to Contact <del>Alfredo Roberto</del> Norbert Escobar	
c. Address 10 Lakeside Lane, Suite 3-A, Denver, CO 80212		d. Tel. No. (303)458-1600	e. Cell No.
		f. Fax No.	g. e-Mail
h. The above-named labor organization or its agents have engaged in and are engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (1)(A) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act, or are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, the above-named union has coerced and threatened employees because they waged Beck objections.			
3. Name of Employer Cargill Meat Solutions Corporation		4a. Tel. No. 970-867-8223.	4b. Cell No.
		4c. Fax No.	4d. e-Mail
5. Location of Plant involved (street, city, state, and ZIP code) 1505 E. Burlington Ave., Fort Morgan, CO 80701-4611		6. Employer representative to contact Allen Boelter, Plant Manager	
7. Type of Establishment (factory, mine, wholesaler) Food processing	8. Principal product or service Meat processing plant	9. Number of Workers employed 2000	
10. Full name of party filing charge Said Ali on behalf of himself and other similarly situated individuals		11a. Tel. No. (303)578-4400	11b. Cell No. (520)664-7647
		11c. Fax No. (303)578-4401	11d e-Mail lw@rmlawyers.com
11. Address of party filing charge (street, city, state, and ZIP code) 2701 Lawrence St., Ste. 100, Denver, CO 80205-2226			
12. DECLARATION			
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.			
By: 	Laura Wolf Rathod Mohamedbhai, LLC Attorney	Tel No. (303)578-4400	
(signature of representative or person making charge)	Printtype name and title or office, if any	Cell No. (520)664-7647	
Address: 2701 Lawrence St. Ste. 100, Denver, CO 80205-2226	Date: 4/28/16	Fax No. (303)578-4401	
		e-Mail lw@rmlawyers.com	

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.

NATIONAL LABOR  
RELATIONS BOARD  
REGION 27

2016 APR 28 AM 11:32

DENVER, CO 80294

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD

**TEAMSTERS LOCAL UNION NO. 455**  
Charged Party  
and  
**RATHOD MOHAMEDBHAI, LLC**  
Charging Party

Case 27-CB-168294

**AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST LABOR ORGANIZATION**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **April 28, 2016**, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

Norberto Roberto  
Teamsters Local Union No. 455  
10 Lakeside Ln.  
Ste. 3-A  
Denver, CO 80212

Linda M. Cote, General Counsel  
Teamsters Local Union No. 455  
10 Lakeside Ln.  
Ste. 3A  
Denver, CO 80212-7430

Teamsters Local Union, No. 455  
1025 Burlington Ave.  
Fort Morgan, CO 80701

April 28, 2016

\_\_\_\_\_

Date

Scott D. Young,  
Designated Agent of NLRB

\_\_\_\_\_

Name

/s/ Scott D. Young

\_\_\_\_\_

Signature

# EXHIBIT C

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 27

TEAMSTERS LOCAL UNION NO. 455 (CARGILL  
MEAT SOLUTIONS CORPORATION)

and

Case 27-CB-168294

SAID ALI, AN INDIVIDUAL

---

COMPLAINT AND NOTICE OF HEARING

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This Complaint and Notice of Hearing is based on a charge filed by Said Ali (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 Teamsters Local Union No. 455 (Respondent) has violated the Act as described below.

1.

(a) The charge in this proceeding was filed by the Charging Party on January 25, 2016, and a copy was served on Respondent by U.S. mail on the same day.

(b) The first amended charge in this proceeding was filed by the Charging Party on April 28, 2016, and a copy was served on Respondent by U.S. mail on the same day.

2.

(a) At all material times, Cargill Meat Solutions Corporation (the Employer) has been a corporation with an office and place of business in Fort Morgan, Colorado (Employer's facility), and has been engaged in the manufacturing, processing, and non-retail sale of meat.

(b) In the past 12 months, the Employer has sold and shipped from its Fort Morgan, Colorado facility goods valued in excess of \$50,000 directly to points outside the State of Colorado.

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

3.

At all material times, Respondent has been a labor organization within the meaning of Section 2(5) of the Act.

4.

At all material times, the following individuals held the position set forth opposite their respective names and have been agents of Respondent within the meaning of Section 2(13) of the Act:

Norberto Ricardo - Business Agent  
Adan Morales - Assistant Business Agent  
Ali Gele Elmi - Steward

5.

About early November 2015, Respondent, by Norberto Ricardo, Adan Morales, and Ali Gele Elmi, at the Employer's facility:

(a) Told employees that Respondent would no longer represent them because they objected to the payment of dues and fees for non-representational activities.

(b) Threatened employees with preventing them from being promoted because they objected to the payment of dues and fees for non-representational activities.

(c) Interrogated employees about why they objected to the payment of dues and fees for non-representational activities.

6.

About December 16, 2015, Respondent, by Adan Morales and Ali Gele Elmi, at the Employer's facility, told employees that Respondent no longer represented them because they objected to the payment of dues and fees for non-representational activities.

By the conduct described above in paragraphs 5 and 6, Respondent has been restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(b)(1)(A) of the Act.

8.

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

#### REMEDY

As part of the remedy for Respondent's unfair labor practices alleged above in paragraphs 5 and 6, the General Counsel seeks an Order requiring that, in addition to English, Respondent be required to post and electronically distribute the notice to employees in Spanish, Somali, and any other languages that may be appropriate. The General Counsel further seeks such other relief as may be appropriate 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 June 7, 2016, or postmarked on or

**before June 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.

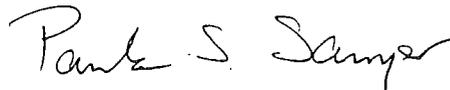
An answer may also be filed electronically through the Agency's website. To file electronically, go to [www.nlr.gov](http://www.nlr.gov), click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests 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 25, 2016, at 9:00 a.m., and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board in the Hearing Room, Byron Rogers Federal Building, 1961 Stout Street, Suite 130103, Denver, Colorado 80294. 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 Denver, Colorado this 24<sup>th</sup> day of May, 2016.



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PAULA S. SAWYER  
REGIONAL DIRECTOR  
NATIONAL LABOR RELATIONS BOARD  
REGION 27  
BYRON ROGERS FEDERAL OFFICE  
BUILDING  
1961 STOUT STREET, SUITE 13-103  
DENVER, CO 80294

Attachments

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 27

TEAMSTERS LOCAL UNION NO. 455 (CARGILL  
MEAT SOLUTIONS CORPORATION)

and

Case 27-CB-168294

SAID ALI, 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 **May 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:

Norberto Ricardo, Business Agent  
Teamsters Local Union No. 455  
10 Lakeside Ln.  
Ste. 3-A  
Denver, CO 80212

**CERTIFIED MAIL**

Linda M. Cote, General Counsel  
Teamsters Local Union No. 455  
10 Lakeside Ln.  
Ste. 3A  
Denver, CO 80212-7430

**REGULAR MAIL**

Teamsters Local Union, No. 455  
1025 Burlington Ave.  
Fort Morgan, CO 80701

**REGULAR MAIL**

Laura Wolf, Attorney  
Rathod Mohamedbhai, LLC  
2701 Lawrence St.  
Ste. 100  
Denver, CO 80205-2226

**CERTIFIED MAIL**

Allen Boelter, General Manager  
Cargill Meat Solutions Corporation  
1505 E. Burlington Ave.  
Fort Morgan, CO 80701-4611

**REGULAR MAIL**

May 24, 2016  
Date

Monika Kurschen,  
Designated Agent of NLRB  
Name

/s/ Monika Kurschen  
Signature

# EXHIBIT D

7011 2970 0000 1481 7396

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
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For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark: DENVER, CO MAY 24 2016  
 CB-168294  
 CPT

*Sent To* Norberto Ricardo, Business Agent  
*Street, Apt. No., or PO Box No.* Teamsters Local Union No. 455  
 10 Lakeside Ln.  
*City, State, ZIP+* Ste. 3-A  
 Denver, CO 80212

Form 3800, August 2000 Use for Instructions



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## Product & Tracking Information

Postal Product:

Features:  
Certified Mail™

## Available Actions

[Text Updates](#)

[Email Updates](#)

May 26, 2016 , 11:40 am	Delivered, Front Desk/Reception	DENVER, CO 80212
May 26, 2016 , 4:30 am	Departed USPS Facility	DENVER, CO 80266
May 24, 2016 , 10:01 pm	Arrived at USPS Facility	DENVER, CO 80266

## Track Another Package

Tracking (or receipt) number

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[Track It](#)

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- [No FEAR Act EEO Data](#)

# **EXHIBIT E**



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 27  
Byron Rogers Federal Office Building  
1961 Stout Street, Suite 13-103  
Denver, CO 80294

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (303)844-3551  
Fax: (303)844-6249

Agent's Direct Dial: (303) 844-6629

June 8, 2016

Linda M. Cote, General Counsel  
Teamsters Local Union No. 455  
10 Lakeside Ln., Ste. 3A  
Denver, CO 80212-7430  
CERTIFIED MAIL # 7011 2970 0000 1481 8355

Re: Teamsters Local Union No. 455  
(Cargill Meat Solutions Corporation)  
Case 27-CB-168294

Dear Ms. Cote:

On May 24, 2016, you were served by Regular Mail with a copy of the Complaint and Notice of Hearing in the above-captioned case. Sections 102.20 and 102.21 of the Board's Rules and Regulations, a copy of which is enclosed, provide that the allegations in a complaint shall be deemed admitted if an answer is not filed within 14 days from service of the complaint, unless good cause is shown. To date, this office has not received your answer to the Complaint which issued in the instant case.

Please be advised that unless an answer is received in this office by the close of business **June 22, 2016**, a Motion for Summary Judgment will be filed forthwith with the Board. Please note that a copy of your answer must also be served on the other parties to this proceeding.

Very truly yours,

/s/ Leticia Peña

LETICIA PEÑA  
Regional Attorney

cc: Norberto Ricardo, Business Agent  
Teamsters Local Union No. 455  
10 Lakeside Lane, Ste. 3-A  
Denver, CO 80212

Teamsters Local Union, No. 455  
1025 Burlington Ave.  
Fort Morgan, CO 80701

5558 7011 2970 0000 1481 8355

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**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)  
For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To: Linda M. Cote, General Counsel  
Teamsters Local Union No. 455  
Street, Apt. No., or PO Box No.: 10 Lakeside Ln., Ste. 3A  
City, State, ZIP: Denver, CO 80212-7430

Handwritten: 27-CB-168294, JR1MK

PS Form 3800, August 2005 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Linda M. Cote, General Counsel  
Teamsters Local Union No. 455  
10 Lakeside Ln., Ste. 3A  
Denver, CO 80212-7430

Handwritten: 27-CB-168294, JR1MK

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature:  Teri Zinanti  Agent  Addressee

B. Received by (Printed Name): Teri Zinanti

C. Date of Delivery: 6-10-16

D. Is delivery address different from item 1?  Yes  No  
If YES, enter delivery address below:

3. Service Type:  Certified Mail®  Priority Mail Express™  Registered  Return Receipt for Merchandise  Insured Mail  Collect on Delivery

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from ser): 7011 2970 0000 1481 8

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 27

**CERTIFICATE OF SERVICE OF: MOTION TO TRANSFER PROCEEDING TO  
THE BOARD AND MOTION FOR DEFAULT JUDGMENT**

I, the undersigned employee of the National Labor Relations Board, state under oath that on **June 23, 2016**, I served the above-entitled document(s) by e-mail, e-file and regular mail upon the following persons, addressed to them at the following addresses:

National Labor Relations Board Gary Shinnery, Executive Secretary 1015 Half Street SE Washington, DC 20570 <a href="mailto:Gary.Shinnery@nlrb.gov">Gary.Shinnery@nlrb.gov</a>	E-File
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Division of Judges National Labor Relations Board 901 Market, Suite 300 San Francisco, CA 94103	E-Mail
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