

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

OMNISOURCE CORPORATION

and

Case 08-CA-167138

UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY,
ALLIED-INDUSTRIAL AND SERVICE
WORKERS INTERNATIONAL UNION,
AFL-CIO/CLC, LOCAL 9130-03

GENERAL COUNSEL'S ANSWERING BRIEF
TO RESPONDENT EXCEPTIONS
TO ADMINISTRATIVE LAW JUDGE'S DECISION

Karen N. Neilsen, Esq.
Counsel for the General Counsel
National Labor Relations Board, Region 8
AJC Federal Building, Room 1695
1240 East 9th Street
Cleveland, OH 44199
Tel. (216) 303-7384 Fax (216)522-2418
Karen.neilsen@nrlb.gov

Pursuant to Sec. 102.46 of the National Labor Relations Board's Rules and Regulations, Counsel for the General Counsel files this Answering Brief to Respondent's Exceptions to the Administrative Law Judge's decision in the above-captioned matter.

I. INTRODUCTION

On February 13, 2017, Administrative Law Judge (ALJ) Paul Bogas issued a decision concluding that Respondent violated Section 8(a)(3) and (1) when it discharged four employees on December 18, 2015, from its scrap yard located in Mansfield, Ohio. The discharges grew out of a grievance filed by one of the discharged employees, Roy Thompson. The other discharged employees, Ricky Dean, Darrell Smith and Terry Timman, were union representatives who were terminated for processing Thompson's grievance. As the ALJ concluded "[t]he ferocity of management's response to the Union's grievance in this case is, in my view, shocking. Rather than simply accepting or rejecting the grievance, the Respondent discharged every one of the employees involved with pursuing that grievance." (JD at 21, ¶ 3).¹

In his decision, the ALJ laid out in great detail the record facts, the applicable Board law, and his analysis to support that Respondent unlawfully terminated the four employees. Despite the ALJ's comprehensive recitation of the record evidence, the relevant legal precedent, his fully-support credibility determinations and legal conclusions, Respondent filed 82 exceptions to the ALJ's decision.² Respondent's exceptions are without merit and serve only to obfuscate its outrageous, unlawful conduct.

¹ Because the Judge's decision does not have line numbers, citations refer to paragraph numbers beginning with the first paragraph or continued paragraph at the top of each page.

² Respondent actually filed 82 "plus" exceptions as Exception 74 has multiple parts.

Respondent's 82 exceptions can generally be categorized into the following topic areas:

- 1) Respondent's investigation of Thompson's grievance and its failure to make an honest inquiry into its underlying facts (R. Exceptions 1, 2, 11, 14 through 30, 33 through 37, 41, 42, and 78);
- 2) Division Manager Chris Charlebois' alleged assault on employee Roy Thompson which prompted the grievance (R. Exceptions 8 through 10, 59 through 67, 74(e), 75, and 77);
- 3) Comments made by Charlebois at a meeting attended by Thompson, Unit Griever (steward) Terry Timman, and Plant Manager Bob Oney which occurred on December 7 immediately following the alleged assault (R. Exceptions 12, 13, 55 through 57, 68 through 72, 74(c), and 76);
- 4) Comments made by Charlebois at a Labor-Management meeting held the previous week on December 2, and which were discussed during the processing of the grievance (R. Exceptions 3 through 7, 48 through 54, and 74(d) and (f));
- 5) Miscellaneous factual findings, and other findings described as "implied" or incomplete (R. Exceptions 31, 32, 38 through 40, 44, 46 47, 58, and 74(a), (b), and (g) through (i)); and
- 6) Overall conclusions and other conclusions described as "implied" findings (R. Exceptions 43, 45, 73, 79 through 82).

Notably, many of Respondent's exceptions deal with factual findings based on credibility resolutions made by the ALJ in favor of the General Counsel's witnesses. These resolutions are overwhelmingly supported by the record evidence and, according to established Board policy,

should not be overruled. *Standard Dry Wall Products*, 91 NLRB 544 (1950), *enfd.* 188 F.2d 362 (3d Cir. 1951). Similarly, many of the exceptions deal with factual findings based on testimony given by Respondent's own witnesses especially with respect to Respondent's failure to conduct an honest inquiry into Manager Charlebois' assault upon Thompson.

Regarding Respondent's brief in support of its exceptions, Counsel for the General Counsel points out that Respondent failed to specifically reference its exceptions but for an occasional parenthetical. Respondent chose instead to recite versions of the facts that are for the most part unsubstantiated in the record. Respondent then creatively argued legal theories that it claimed support its hyperbolic facts. Section 102.46(a)(2)(ii) of the Board's Rules and Regulations sets forth that briefs in support of exceptions shall specify the questions involved and are to be argued together with a reference to the specific exceptions to which they relate. Additionally Section 102.46(a)(2)(iii) mandates that any argument set forth in a brief must clearly present "the points of fact and law relied on in support of the position taken on each question, with the specific page citations to the record and the legal or other material relied on." (Emphasis added).³

Notwithstanding Respondent's attempt to muddy the waters, Judge Bogas' findings and conclusions are unequivocally supported by the record evidence and the law as discussed in his decision.⁴ Consequently, Counsel for the General Counsel finds it unnecessary to respond to

³ For example, in Exception 30, Respondent excepts to "the ALJ's factual finding that the Union had no notice and was unaware that Respondent OmniSource's investigation into the statements the employees made would involve Respondent OmniSource's determining whether the employees' statements were true or whether they had engaged in misconduct while making such statements." However, similar to its other exceptions, there is no singular reference to Exception 30 in Respondent's brief.

When one consults Respondent's list of exceptions, the cited references for Exception 30 refer to Judge Bogas finding that "[a]t some point during the investigation of the grievance regarding the alleged misconduct by Charlebois, the Respondent, without notifying the Union, re-cast the investigation as one into whether the employees had engaged in misconduct while pursuing the grievance." (JD at 4, ¶ 2). The attendant transcript citations then refer to testimony by GC witnesses Rick Dean and Darrell Smith. Specifically, the employees testified to a threat that had been made to Unit Chair Dean by Corporate Human Resource Manager Andrew Ables at a third step grievance meeting on December 15 where an argument ensued about Charlebois' behavior. (Tr. 543-44, 567, 622-24). One has to surmise that Respondent is asserting it perfected its "so-called" notification to the Union when Ables became mad and threatened Dean exclaiming "if I find you guys are lying, there will be consequences." (Tr. 543).

⁴ For example, in Exception 58, Respondent "takes exception to the ALJ's factual finding respecting the threat of suspension made at the December 7 meeting unless Thompson completed an incident report. (ALJD at 9, ¶ 2) . . . [and that the] finding is unsupported by the record." Again there is no singular reference in Respondent's brief to this exception. However, Respondent takes the exception even though its counsel specifically cross-examined

most of what Respondent has raised in its exceptions and brief as the ALJ has already done so in his decision. Rather, Counsel for the General Counsel will address only a couple of factual points including ones not discussed by the ALJ, but which bolster his findings and conclusions.⁵

III. RESPONDENT’S EXCEPTIONS CONCERNING CHARLEBOIS GRABBING THOMPSON IN THE HALLWAY

In Exceptions 8 through 10, 59 through 67, 74(e), 75, and 77, Respondent excepts to the ALJ’s failure to credit Manager Chris Charlebois’ testimony over employee Roy Thompson’s testimony concerning an incident that happened in the hallway of Respondent’s office area on December 7, 2015. At the time of the incident, Thompson was on his way to Respondent’s conference room to attend a meeting concerning his refusal to fill out an incident report on a crane. Without crediting one over the other, the ALJ found that both of their versions were not so far off that Thompson have would lost the protection of the Act for filing a grievance even if Charlebois’ version was credited. (JD at 19, ¶ 1).

A. Employee Roy Thompson’s Testimony

According to Thompson, on December 7, which was about a week after the Liebherr crane that he had been operating malfunctioned, General Manager Bob Oney approached him in

Thompson’s union representative, Terry Timman, by asking: “[W]hat he was told was if he doesn’t do it, he would get a one-day suspension, correct?” And Timman responded, “correct.” (Tr. 387).

⁵ In Exception 74(i), Respondent asserts that the ALJ’s factual findings were not complete because he ignored that the Regional Director had “found probable cause the employees were lying about Charlebois in order to secure his removal from the facility and issued a formal complaint against the Union” in Case 08-CB-168962. This exception and any similar reference to a hypothesized motive of “probable cause” in Respondent’s brief are not part of the record evidence. While a consolidated complaint is in the record as GC Exh. 1(e), Case 08-CB-168962 was severed out of the complaint prior to the start of the trial. (GC Exh. 1(m); Tr. 10-13). Therefore, the only matters pending before the judge were the allegations that Respondent had violated Section 8(a)(3) and (1) when it discharged the four employees. The ALJ specifically recognized that the CB case was “not within his purview” (Tr. 11), and that any references to it in the formal papers were merely “historical artifacts.” (Tr. 13). Accordingly, any imagined theories that Respondent attempts to make concerning the prior consolidated complaint are completely without basis and should not be considered, if not stricken.

the breakroom and asked him to fill out an accident report. (Tr. 219). Thompson repeated what he had already told Yard Supervisor Brian Laughery about the scrap yard employees not previously having to fill out written reports. (Tr. 218-9). Even though Thompson had verbally reported the problem to Laughery both before and the after damage had occurred to the crane (Tr. 215-16), Oney insisted that Thompson write a report and called Unit Griever, i.e., steward, Terry Timman to the breakroom. (Tr. 219-20).⁶

After Timman arrived, the three men walked from the breakroom into the office area where they preceded down a short hallway into the conference room. (Tr. 221-22). Oney led the way, then Timman, and then Thompson who was at least 5 feet behind. (Tr. 220). When Thompson reached Charlebois' office, Charlebois was at his doorway and offered his hand to shake Thompson's hand. (Tr. 221). According to Thompson, when he ignored Charlebois' outstretched hand, Charlebois reached out and grabbed him by the jacket. (Tr. 221-23). Charlebois pulled Thompson back about a foot towards him so that the two men were touching. Thompson testified that Charlebois was so close that he "felt [Charlebois'] body up against his shoulder. (Tr. 223). At the same time, Charlebois sternly said "[w]hat's wrong with you? You don't shake a man's hand when he puts it out in front of you?" (Tr. 221). To which, Thompson responded no and pulled himself away by motioning his arm similar to a swim stroke. (Tr. 221, 223-24). Thompson then went into the conference room with Charlebois following. (Tr. 224).

Thompson testified that no one was in the hallway at the time Charlebois grabbed him. (Tr. 221). Although Oney testified that "usually" he stands in the doorway of the conference

⁶ Both Charlebois and Oney overly exaggerated the importance of Thompson's report claiming that they needed it so that it could be shared with Respondent's other facilities via Respondent's Intalex system. (Tr. Charlebois. 719-20, 751-52; Oney 875-77, 885-85, 889-90, 910-11). But the report that Thompson wrote was essentially useless for such a purpose as it did not identify the type of crane that he had been operating or what had caused the problem which Oney reluctantly admitted on cross-examination. (GC Exh. 17; Tr. 910-11). As the ALJ noted, Thompson believed that Respondent was merely trying to create a paper trail against him for disciplinary reasons. (JD at 8, ¶ 1).

room, he conceded on cross-examination that he was already inside of the conference room when Thompson walked past Charlebois' door. (Tr. 921). Similarly, Unit Griever Terry Timman was not aware of what had happened in the hallway as he too was already inside of the conference room. (Tr. 342).

B. Charlebois' Inconsistent Testimony and Written Accounts

In his testimony, Charlebois denied grabbing Thompson in the hallway. (Tr. 713). But he added that "my hand may have brushed against him when I was trying to shake his hand, but no more than that." (Tr. 713). He testified that he did not shake Thompson's hand, because Thompson's hands were in his pocket (sic). (Tr. 713-14). Respondent placed into evidence an account written by Charlebois in which he described his version of the events on December 7 which included his attempt to shake Thompson's hand in the hallway, albeit without the pockets reference. (R. Exh. 21; Tr. 717). Charlebois testified that he wrote this version of events sometime between December 10 and 15, 2015. (Tr. 717). In this version (R. Exh 21), Charlebois wrote that he tried to shake Thompson's hand and that Thompson had brushed right by him.⁷

⁷ In Respondent Exhibit 21, which turned out to be his second version of the incident, Charlebois wrote:

Bob walks by my office (I was sitting at my desk), he nods his head and says 'they are behind me'. Following in line were Bob, Terry Timman and Roy Thompson. I stood up and walked to my office door way, which takes approximately three (3) seconds. Terry had just passed my door and Roy was next; as I walked through my office doorway, I offered Roy my hand (to shake) and he brushed right by me, turned his body sideways (there is not enough room for two grown me to pass side by side, facing each other in the hallway) and Roy almost hugged the wall with his back. I then proceed to the conference room which took two (2) maybe (3) seconds. Everyone was in the room when I entered the room, I shook Terry's hand, (as I always do) greeted Terry and Roy. Roy went to the furthest chair at the opposite end of the table, slouched down and he sourly said, 'I don't want anything to do with you, everything has changed since you got here!' It was obvious to me the, that Roy appeared to be in a negative mood, sullen, hands in his pocket, and his head and eyes down.

(Tr. 716-17).

However this was actually the second version that Charlebois had written in this same time period. (Tr. 775-77). His earlier version was admitted into evidence as General Counsel Exhibit 35. (Tr. 773, 785). In this first version, which Charlebois presumably began writing immediately after the hallway incident, Charlebois neglected to mention anything at all about trying to shake Thompson's hand in the hall. Rather, Charlebois wrote that he tried to shake Thompson's hand in the conference room. (G.C. Exh. 35). Charlebois also wrote that he was still seated at the time the three men had walked by his office door.⁸ Charlebois' two written versions beg the question of why he felt compelled to write that his attempt to shake Thompson's hand had occurred in two different locations.

C. Respondent Exception 74(e)

All of Respondent's exceptions cited above concerning Charlebois grabbing Thompson involve credibility. Notwithstanding, in Exception 74(e), Respondent asserted a lack of "completeness of the ALJ's factual findings respecting the veracity of the employees and management. . ." claiming that Thompson was inconsistent in his version of events. However, this assertion is wholly unsupported by the record and is contrary to the Judge's findings. The ALJ's so-called" lack of "completeness" has nothing to do with Thompson or any other of the

⁸ In this first version, Charlebois wrote:

Bob comes by my office (I was sitting at my desk), he nods his head and says 'they are behind me'. Following in line was Bob, Terry Timmins (sic) and Roy Thompson. Terry's demeanor was consistent and Roy was in tow, he appeared to be in mood, sullen, hands in his pocket, head down, and rubbing against the wall. I instantly stood up and walked to the conference room (it took maybe three seconds). Everyone was in the room when I entered the room, I shook Terry's hand, (as I always do) greeted him and Roy. Roy went to the furthest chair at the table, slouched down and I asked if he would like to shake hands and he sourly said, 'I don't want anything to do with you!'

Bob sat to my left, Terry sat to my right and Roy was completely at the other end of the table.

(G.C. Exh. 35)

witnesses presented by the General Counsel. As cited above, it is Charlebois' testimony about the hall-grabbing incident and his two inconsistent written versions of it that are at odds and were not taken into account by the ALJ.

IV. RESPONDENT'S EXCEPTIONS CONCERNING ITS FALSE ASSERTIONS THAT UNIT GRIEVER TERRY TIMMAN CHANGED HIS STORY

In Exceptions 36, 71 and 74(c), Respondent excepts to the Judge's finding in footnote 11 at page 20 concerning Unit Griever Terry Timman. In essence, Respondent maintains in its written exceptions that Timman "changed his story" when he recounted to Human Resource Manager Linda McKinley what had been said by District Manager Charlebois involving "dinosaurs" at the December 7 meeting with employee Roy Thompson. However, Respondent's assertions are not supported by the record evidence as found by the Judge. (JD at 20, fn. 11). Respondent's assertions are also discredited by additional testimony that was not addressed in the Judge's decision concerning a conversation between Timman and Charlebois which occurred just prior to employee Quentin Kiser's discharge on the morning of December 3.

A. Charlebois' December 7 "Dinosaurs Will be Shot" Comment

Immediately after Charlebois grabbed Thompson in the hallway on December 7, Thompson entered the conference room and sat next to Terry Timman on the right side of the table directly across from Bob Oney. (Tr. 224, 1059).⁹ After everyone was seated, Charlebois told Thompson that he needed to fill out an accident report for the Liebherr Crane incident. After Thompson said that they never had to fill out accident reports before and that he felt like they were trying to develop a paper trail on him to fire him, Charlebois responded that he was

⁹ Thompson was not at the opposite end of the table as Charlebois contended in his two written accounts. (GC Exh. 35, R. Exh. 21).

either going to do this or that they were going to suspend him for one day for insubordination. (JD at 13, ¶ 2; Tr. 224, 339).

At this point, Charlebois then made the “dinosaur” comment as found by the Judge. Thompson testified that Charlebois said that “People are going to conform to my way, or all the old dinosaurs will be shot.” (JD at 13, ¶ 3; Tr. 225). According to Timman, the statement was that “The old dinosaurs will comply or will be shot.” (JD at 13, ¶ 3; Tr. 339). According to Plant Manager Bob Oney’s testimony, Charlebois stated that “Everyone needs to conform to the way things are heading and that some old dinosaurs may not survive.” (JD at 13, ¶ 3; Tr. 916-17; R. Exh. 20). As the Judge observed, Charlebois initially testified that he had said “Here’s an example of an employee who is a dinosaur, [and] some old dinosaurs may not survive.” (JD at 13, ¶ 3; Tr. 790). But then later “recanted to some extent stating that he would “never” have used the word “survive.” (JD at 13, ¶ 3; Tr. 791).¹⁰

B. Charlebois’ Other “Dinosaur” Comment Not Addressed by the ALJ

Unit Griever Terry Timman testified to two conversations that he had with Division Manager Chris Charlebois on the morning of December 3 which occurred before and after a discharge meeting concerning employee Quentin Kiser. (Tr. 320-323). However, these conversations were not addressed by the ALJ. In the pre-discharge conversation as described below, Charlebois made a “dinosaur” comment similar to the one he would then make at the December 7 meeting about Thompson’s failure to fill out an accident report.

¹⁰ As noted by the Judge, Charlebois had other versions of the statement including one in his written accounts. (JD at 13, ¶ 3; R. Exh. 21). “This was an example of an employee who refuses to buy into the new culture; they become dinosaurs and they get passed by!” (R. Exh. 21; GC Exh. 35). Notwithstanding, the dinosaur threat was made immediately after Thompson objected to filling out the report concerning the incident with the Liebherr Crane which occurred around Thanksgiving right after Thompson had quit the two employer-sponsored committees.

According to Timman, the discharge meeting had been scheduled for 8:30 a.m., but Plant Manager Oney had asked Timman to come 15 minutes early. At about 8:15 a.m., when Timman was walking past Charlebois' doorway to the conference room, the latter motioned him into his office. (Tr. 322). Charlebois then asked him about Tammany Hall, which was a reference to their conversation the day before at the Labor-Management meeting. (Tr. 322-23).¹¹ The two men then began to converse about history and Timman relayed that his uncle was the retired historian for the Firelands Area. (Tr. 323-24). After Charlebois indicated that he liked World War history, he asked Timman if he believed in Henry Ford's concept of "equal pay for equal work." Timman, who appears to be an avid history buff, told Charlebois that he was not a fan of Ford because he had been friends with Hitler and had been given Germany's highest award - the German Grand Eagle Cross - which Charlebois did not believe. (Tr. 323-24).

Then Charlebois changed the subject telling Timman that OmniSource was in "survival mode, and if it wasn't for the parent SDI company, that OmniSource would be pretty much closed." (Tr. 324). Charlebois then walked over to a picture on his wall which he indicated was an old Bethlehem Steel plant that had gone into bankruptcy. As they stood by the picture, Charlebois told him that "the old dinosaurs will comply or will be left behind." (Tr. 324-25). The men then left for Kiser's discharge meeting. (Tr. 325-26).¹²

C. Respondent's Exceptions

In its brief, Respondent does not specifically address Exceptions 36, 71 or 74(c). Rather, scattered within it are references that Timman had "allegedly" changed his story and that this

¹¹ After Timman and Charlebois had their exchange about Stalin and Hitler at the December 2 Labor-Management meeting, Timman testified that Charlebois "leaned over and asked [Timman] where he could buy a union job" to which Timman responded at "Tammany Hall." (Tr. 313).

¹² Ironically, Kiser had been discharged under the parties March 2, 2012, Letter of Understanding for threatening to bash another employee's head.¹² (Tr. 327; GC Exh. 23).

was a reason why Respondent felt compelled to discharge the employees. However it appears that because of Respondent's bias during the investigation, or perhaps its purposeful intent to get rid of the employees who were creating obstacles in "its path to change," Respondent ignored Charlebois' other "dinosaur" comment which had been made on December 3 just prior to Kiser's discharge.

Timman had initially told Human Resource Manager Linda McKinley about this other comment when they first talked on December 8. (Tr. 604).¹³ The Union also raised the matter again with Respondent at the December 15 third step grievance meeting. (Tr. 543, 621-22). At this meeting, Charlebois denied making any dinosaur comments. According to Darrell Smith's testimony, after Charlebois' denial, Timman questioned: "So are you saying when we met in your office before the Quentin -- before the Quentin termination, that you didn't make the comment 'the old dinosaurs will be left behind?'" (Tr. 621-22) When Charlebois denied it again, Timman called him a "f_____ liar." (Tr. 622).

As mentioned above, the Judge did not address Charlebois' other "dinosaur" comment or Respondent's knowledge of it. At the hearing, Respondent's counsel also failed to question any of its witnesses about Timman's testimony or Smith's corroboration concerning Charlebois' other "dinosaur" comment. Respondent's failure to question a witness about an incident of which he has knowledge can lead to an adverse inference being drawn that the testimony would not have been favorable to respondent. *Flexsteel Industries, Inc.*, 316 NLRB 745, 757 (1995). In response to Respondent's exceptions that the Judge did not find that Timman had "changed his story," Counsel for the General Counsel asserts that the record fully supports the Judge's findings and, if anyone had "changed his story," it was Charlebois.

¹³ Darrell Smith testified that Timman had told HR Manager McKinley about his December 3 discussion with Charlebois when they first met with her about Charlebois on December 8. (Tr. 604).

V. CONCLUSION

For all of the above-mentioned reasons, the General Counsel respectfully requests that Board reject Respondent's exceptions and affirm Judge Bogas' decision that Respondent violated Section 8(a)(3) and (1) when it discharged employees Ricky Dean, Darrell Smith, Roy Thompson, and Terry Timman.

The General Counsel further requests that the Board order all appropriate remedies. Specifically, as set forth in the General Counsel's exceptions, Respondent should be ordered to reimburse the discriminatees for all search-for-work and work-related expenses regardless of whether the discriminatees received interim earnings in excess of these expenses overall or in any given quarter; and to reimburse the discriminatees for all consequential damages incurred by them as a result of its unlawful conduct.

Respectfully submitted,

/s/ Karen N. Neilsen

Karen N. Neilsen, Esq.
Counsel for the General Counsel
National Labor Relations Board, Region 8
AJC Federal Building, Room 1695
1240 East 9th Street
Cleveland, OH 44199
Phone 216-303-7384 Fax 216-522-2418
karen.neilsen@nlrb.gov

Filed on the 25th day of April, 2017
Corrected copy filed on the 26th day of April, 2017

CERTIFICATE OF SERVICE

On this day, April 26, 2017, I certify that the foregoing corrected copy of the General Counsel's Answering Brief to Respondent's Exceptions to the Administrative Law Judge's Decision, which was previously filed and served on April 25, 2017, was served by e-mail on the following counsel:

Cathleen M. Shrader, Esq.
Anthony M. Stites, Esq.
Counsel for Respondent
Barrett & McNagny
215 East Berry Street
P.O. Box 2263
Fort Wayne, IN 46801
Phone: 260-423-9551 Fax: 260-423-8920
CMS@barrettlaw.com; AMS@barrettlaw.com

Dan Kovalik, Senior Associate General Counsel
Nancy A. Parker, Assistant General Counsel
Counsel for the Charging Party
United Steel, Paper and Forestry, Rubber,
Manufacturing, Energy, Allied-Industrial and
Service Workers International Union
United Steel Workers Legal Department
60 Boulevard of the Allies, Ste. 807
Pittsburgh, PA 15222-1209
Phone 412-562-1679 Fax 412-562-2574
DKovalik@usw.org; nparker@usw.org

/s/ Karen N. Neilsen

Karen N. Neilsen, Esq.
Counsel for the General Counsel
National Labor Relations Board, Region 8
AJC Federal Building, Room 1695
1240 East 9th Street
Cleveland, OH 44199
Phone 216-303-7384 Fax 216-522-2418
karen.neilsen@nrlrb.gov

Corrected copy filed this 26th day of April, 2017