

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

**CHICAGO TEACHERS UNION**

**AND**

**Cases 13-CA-207629  
13-CA-213316**

**JOHN KUGLER, AN INDIVIDUAL**

**MOTION TO TRANSFER PROCEEDINGS TO THE BOARD AND  
MOTION FOR DEFAULT JUDGMENT**

Now comes J. Edward Castillo, Counsel for the General Counsel of the National Labor Relations Board, pursuant to Section 102.50 of the Board's Rules and Regulations, Series 8, as amended, who files this Motion to Transfer Proceedings to the Board and Motion for Default Judgment. These Motions are made upon the assertion that the General Counsel is entitled to judgment pursuant to Section 102.20 of the Board's Rules and Regulations, inasmuch as Respondent has failed to file an Answer to the Order Consolidating Cases, Consolidated Complaint and Notice of Hearing within the time required thereby. *Windward Roofing and Construction Co., Inc.*, 333 NLRB 658 (2001); *U.S. Telefactors Corporation*, 293 NLRB 567 (1989).

In support of these motions, Counsel for the General Counsel respectfully submits the following:

1. On October 6, 2017, John Kugler, an Individual, filed a charge in Case 13-CA-207629 alleging that Chicago Teachers Union (Respondent) had engaged in certain unfair labor practices affecting commerce as set forth and defined in the National Labor Relations Act, 29

U.S.C. Section 151 et seq. (the Act). A copy of the charge is attached hereto as **Exhibit 1** and the affidavit of service is attached hereto as **Exhibit 2**.

2. On January 18, 2018, Kugler filed a charge in Case 13-CA-213316 alleging that Respondent had engaged in additional unfair labor practices affecting commerce as set forth and defined in the Act. A copy of the charge is attached hereto as **Exhibit 3** and the affidavit of service is attached hereto as **Exhibit 4**.

3. On May 7, 2018, the Regional Director for Region 13 issued an Order Consolidating Cases, Consolidated Complaint and Notice of Hearing alleging that Respondent violated Section 8(a)(1) of the Act by: (1) selectively and disparately enforcing a work rule; and (2) threatening to retain legal counsel and pursue unfair labor practice charges against the union that represents its unit employees because those employees engaged in union and protected concerted activities. The Consolidated Complaint further advised Respondent that if it failed to file an Answer within 14 days of service of the Complaint as required under Sections 102.20 and 102.21 of the Board's Rules and Regulations, the Board might find, pursuant to a Motion for Default Judgment, all of the allegations to be true. A copy of the Order Consolidating Cases, Consolidated Complaint and Notice of Hearing is attached hereto as **Exhibit 5** and the affidavit of service is attached hereto as **Exhibit 6**.

4. On June 19, 2018, the undersigned sent Respondent a letter by both certified mail and email confirming that it had failed to file an Answer to the Complaint within the time period set forth in Sections 102.20 and 102.21 of the Board's Rules and Regulations. The letter further stated that a Motion for Default Judgment would be filed with the Board if an Answer was not filed by the close of business on June 26, 2018. A copy of the letter is attached hereto as **Exhibit 7** and the proof of service is attached hereto as **Exhibit 8**.

5. As of this date, Respondent has failed to file an Answer to the Consolidated Complaint and none is anticipated.

6. Based on the foregoing, it is clear that no administrative hearing is necessary in this case and it is appropriate for the Board to issue a Decision and Order without further proceedings herein.

WHEREFORE, Counsel for the General Counsel respectfully requests that the Board grant the Motion to Transfer Proceedings to the Board and the Motion for Default Judgment. The Board should also deem all of the allegations in the Consolidated Complaint to be true and issue an appropriate Decision and Order.

DATED at Chicago, Illinois, this 9th day of July 2018.

Respectfully Submitted

/s/ J. Edward Castillo

J. Edward Castillo  
Counsel for the General Counsel  
National Labor Relations Board  
Region 13  
219 South Dearborn Street, Suite 808  
Chicago, Illinois 60604

Attachments

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Counsel for the General Counsel's Motion to Transfer Proceedings to the Board and Motion for Default Judgment was electronically filed with the National Labor Relations Board on this 9th day of July 2018, and true and correct copies of the document have been served on the parties in the manner indicated below on the same date.

VIA E-MAIL:

Jesse Sharkey, Vice President  
Chicago Teachers Union  
1901 W. Carroll  
Chicago, IL 60612  
jessesharkey@ctulocal1.com

John Kugler  
3701 S Winchester Avenue, Apt. 3R  
Chicago, IL 60609-2038  
kuglerjohn@hotmail.com

/s/ J. Edward Castillo

J. Edward Castillo  
Counsel for the General Counsel  
National Labor Relations Board  
219 South Dearborn Street, Suite 808  
Chicago, Illinois 60604

# Exhibit 1

INTERNET  
FORM NLRB-501  
(2-08)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**Case  
13-CA-207629 Date Filed  
10/6/17**INSTRUCTIONS:**

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

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Chicago Teachers Union	b. Tel. No. (312) 329-6222
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 1901 W Carroll Ave IL Chicago 60612-2401	e. Employer Representative Jesse Sharkey Vice President
	g. e-Mail JesseSharkey@ctulocal1.com
	h. Number of workers employed 80
i. Type of Establishment (factory, mine, wholesaler, etc.) Others	j. Identify principal product or service. Labor Union
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 4 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  --See additional page--	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) John Kugler Title:	
4a. Address (Street and number, city, state, and ZIP code) 3701 S Winchester Ave Apt 3R IL Chicago 60609-2038	4b. Tel. No. (312) 203-1534
	4c. Cell No. (312) 203-1534
	4d. Fax No. (312) 203-1534
	4e. e-Mail kuglerjohn@hotmail.com
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
By John Kugler (signature of representative or person making charge)	John Kugler Title: (Print/type name and title or office, if any)
3701 S Winchester Ave Apt 3R Address Chicago IL 60609-2038	Tel. No. (312) 203-1534
	Office, if any, Cell No. (312) 203-1534
	Fax No. (312) 203-1534
	e-Mail kuglerjohn@hotmail.com
	10/6/2017 21:07:49 (date)

**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.

## Basis of the Charge

**8(a)(4)**

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) filed charges or cooperated with the NLRB.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
John Kugler	Ordered Not to do Union Work	10/4/17

**8(a)(1)**

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
Jesse Sharkey	10/4/2017

# **Exhibit 2**

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

<p><b>CHICAGO TEACHERS UNION</b></p> <p>Charged Party</p> <p>and</p> <p><b>JOHN KUGLER</b></p> <p>Charging Party</p>
--

**Case 13-CA-207629**

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, state under oath that on October 10, 2017, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

Jesse Sharkey, Vice President  
Chicago Teachers Union  
1901 West Carroll Avenue  
Chicago, IL 60612-2401

October 10, 2017

\_\_\_\_\_  
Date

Denise Gatsoudis, Designated Agent of  
NLRB

\_\_\_\_\_  
Name

*/s/ Denise Gatsoudis*

\_\_\_\_\_  
Signature

# **Exhibit 3**

INTERNET  
FORM NLRB-501  
(2-08)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**

Case

13-CA-213316

Date Filed

1/18/18

**INSTRUCTIONS:**

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

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer Chicago Teachers Union		b. Tel. No. (312) 329-6222
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 1901 W Carroll Ave IL Chicago 60612-2401	e. Employer Representative Jesse Sharkey Vice President	g. e-Mail JesseSharkey@ctulocal1.com
		h. Number of workers employed 80
i. Type of Establishment (factory, mine, wholesaler, etc.) Others	j. Identify principal product or service Labor Union	
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		

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

--See additional page--

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

john kugler

Title:

**4a. Address (Street and number, city, state, and ZIP code)**3701 S Winchester Ave Apt 3R  
IL Chicago 60609-2038**4b. Tel. No.**

(312) 203-1534

**4c. Cell No.**

(312) 203-1534

**4d. Fax No.**

(312) 203-1534

**4e. e-Mail**

kuglerjohn@hotmail.com

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)****6. DECLARATION**

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

By john kugler

john kugler

Title:

(signature of representative or person making charge)

(Print/type name and title or office, if any)

**Tel. No.**

(312) 203-1534

**Office, if any, Cell No.**

(312) 203-1534

**Fax No.**

(312) 203-1534

**e-Mail**

kuglerjohn@hotmail.com

3701 S Winchester Ave Apt 3R

01/18/2018 22:38:31

Address Chicago IL 60609-2038

(date)

**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.

## Basis of the Charge

### 8(a)(3)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) joined or supported a labor organization and in order to discourage union activities and/or membership.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
John Kugler	Threat of Legal Action against me	1/18/18
John Kugler	against ULP charges	1/18/18

### 8(a)(1)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
John Kugler	Threat of Legal Action	1/18/18

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prevent or discourage employees from engaging in protected concerted activities.

Work Rule
sent email to stop filing labor complaints

# Exhibit 4

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

**CHICAGO TEACHERS UNION**  
  
Charged Party  
  
and .  
  
**JOHN KUGLER**  
  
Charging Party

**Case 13-CA-213316**

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, state under oath that on January 19, 2018, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

Jesse Sharkey, Vice President  
Chicago Teachers Union  
1901 W Carroll Ave  
Chicago, IL 60612-2401

January 19, 2018

\_\_\_\_\_  
Date

Jamila Franklin, Designated Agent of  
NLRB

\_\_\_\_\_  
Name

/s/ Jamila Franklin

\_\_\_\_\_  
Signature

# Exhibit 5

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

**CHICAGO TEACHERS UNION**

**and**

**Cases 13-CA-207629  
13-CA-213316**

**JOHN KUGLER, AN INDIVIDUAL**

**ORDER CONSOLIDATING CASES, CONSOLIDATED  
COMPLAINT AND NOTICE OF HEARING**

Pursuant to Section 102.33 of the Rules and Regulations of the National Labor Relations Board (the Board) and to avoid unnecessary costs or delay, IT IS ORDERED THAT Case 13-CA-207629 and Case 13-CA-213316, which are based on charges filed by John Kugler, An Individual (Charging Party) against Chicago Teachers Union (Respondent) are consolidated.

This Order Consolidating Cases, Consolidated Complaint and Notice of Hearing, which is based on these charges, is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. § 151 et seq. (the Act) and Section 102.15 of the Board's Rules and Regulations, and alleges Respondent has violated the Act as described below:

**I**

(a) The charge in Case 13-CA-207629 was filed by the Union on October 6, 2017, and a copy was served by regular mail on Respondent on October 10, 2017.

(b) The charge in Case 13-CA-213316 was filed by the Union on January 18, 2018, and a copy was served by regular mail on Respondent on January 19, 2018.

**II**

(a) At all material times, Respondent, a labor organization, has been an unincorporated association with a place of business in Chicago, Illinois, where it represents employees in bargaining with employers.

(b) During the past calendar year, a representative period, Respondent purchased and received goods valued in excess of \$50,000 directly from points outside 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

At all material times, Professional Staff Employees Union (PSEU), a unit of Health Care, Professional, Technical, Office, Warehouse and Mail Order Employees Union, Local 743, IBT has been a labor organization within the meaning of Section 2(5) of the Act.

### IV

At all material times, Jesse Sharkey has held the position of Respondent's Vice-President, and has been a supervisor of Respondent within the meaning of Section 2(11) of the Act and an agent of Respondent within the meaning of Section 2(13) of the Act.

### V

(a) At all material times, Respondent has maintained a rule prohibiting employees from conducting union business on behalf of PSEU during work time.

(b) On October 4, 2017, Respondent, by Jesse Sharkey, in an email, enforced the rule described above in paragraph V(a) selectively and disparately by applying it only against employees who filed unfair labor practice charges against Respondent.

(c) On January 18, 2018, Respondent, by Jesse Sharkey, in an email, threatened to retain legal counsel and pursue unfair labor practice charges against PSEU because employees engaged in union and protected concerted activities.

### VI

By the conduct described above in paragraphs V(b) and (c), Respondent has been interfering with, restraining, and coercing employees in the exercise of rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1), and affecting commerce within the meaning of Section 2(6) and (7) of the Act.

### **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 May 21, 2018, or postmarked on or before May 18, 2018**. 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 September 4, 2018, 11:00 a.m., at 219 South Dearborn Street, 8<sup>th</sup> Floor, Chicago, Illinois, 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 7<sup>th</sup> day of May 2018.

*/s/ Peter Sung Ohr*

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Peter Sung Ohr, Regional Director  
National Labor Relations Board  
Region 13  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-1443

**Attachments**

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
NOTICE

Case 13-CA-207629

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

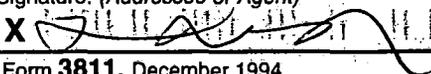
Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Jesse Sharkey , Vice President  
Chicago Teachers Union  
1901 West Carroll Avenue  
Chicago, IL 60612-2401

John Kugler  
3701 South Winchester Avenue  
Apt 3R  
Chicago, IL 60609-2038

# Exhibit 6



Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee):  1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery  Consult postmaster for fee.	
	3. Article Addressed to: Jesse Sharky, Vice President Chicago Teachers Union 13-CA-207629 & 13-CA-213316 Order Conso. Cases, Conso. Complaint & NOH (Castillo)		7015 3430 0000 7716	
4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD		7. Date of Delivery		
5. Received By: (Print Name)		8. Addressee's Address (Only if requested and fee is paid)		
6. Signature: (Addressee or Agent) X 				
PS Form 3811, December 1994		Domestic Return Receipt		

Thank you for using Return Receipt Service.

# Exhibit 7



United States Government

**NATIONAL LABOR RELATIONS BOARD**

Region 13

219 South Dearborn Street - Suite 808

Chicago, Illinois 60604

FAX (312) 886-1341  
Telephone (312) 353-7586  
[www.nlrb.gov](http://www.nlrb.gov)

June 19, 2018

SENT VIA CERTIFIED MAIL AND EMAIL

Jesse Sharkey, Vice President  
Chicago Teachers Union  
1901 W. Carroll  
Chicago, IL 60612

Re: Chicago Teachers Union  
Cases 13-CA-207629, 13-CA-213316

Dear Mr. Sharkey:

On May 7, 2018, the Regional Director of Region 13 issued an Order Consolidating Cases, Consolidated Complaint and Notice of Hearing alleging that Chicago Teachers Union (Employer) had violated Section 8(a)(1) of the Act by: (1) selectively and disparately enforcing a work rule; and (2) threatening to retain legal counsel and pursue unfair labor practice charges against the union that represents its unit employees because those employees engaged in union and protected concerted activities. This Complaint was served on the Employer by certified mail on the same date.

Pursuant to Section 102.20 and 102.21 of the Board's Rules and Regulations, you were required to file an Answer to the Complaint by no later than May 21, 2018. But as of this date, the Regional Office has still not received your Answer. Accordingly, please be advised that a Motion for Default Judgment will be filed with the Board, if an Answer to the Complaint is not received in the Regional Office by the close of business on June 26, 2018. For your convenience, I have enclosed a copy of the Consolidated Complaint.

If you have any questions, please feel free to contact me at the above telephone number.

Very truly yours,

/s/ J. Edward Castillo  
J. Edward Castillo  
Field Attorney

# **Exhibit 8**

**Castillo, J. Edward**

---

**From:** Castillo, J. Edward  
**Sent:** Tuesday, June 19, 2018 4:14 PM  
**To:** 'jessesharkey@ctulocal1.com'  
**Subject:** Chicago Teachers Union (13-CA-207629 and 13-CA-213316)  
**Attachments:** Default warning letter.pdf

Mr. Sharkey,

Please see the attached letter regarding Chicago Teachers Union's failure to file an Answer in the above matter.

**J. Edward Castillo, Esq.** | Field Attorney  
United States Government  
National Labor Relations Board  
Region 13  
219 S. Dearborn Street, Suite 808  
Chicago, IL 60604  
T: 312.353.7586 | F: 312.886.1341

## Castillo, J. Edward

---

**From:** Castillo, J. Edward  
**Sent:** Tuesday, June 19, 2018 4:19 PM  
**To:** 'jessesharkey@ctulocal1.com'  
**Subject:** FW: Chicago Teachers Union (13-CA-207629 and 13-CA-213316)  
**Attachments:** Consolidated Complaint.pdf; Default warning letter.pdf

Mr. Sharkey,

Attached is the Consolidated Complaint that I inadvertently failed to attach to my initial email.

**J. Edward Castillo, Esq.** | Field Attorney  
United States Government  
National Labor Relations Board  
Region 13  
219 S. Dearborn Street, Suite 808  
Chicago, IL 60604  
T: 312.353.7586 | F: 312.886.1341

---

**From:** Castillo, J. Edward  
**Sent:** Tuesday, June 19, 2018 4:14 PM  
**To:** 'jessesharkey@ctulocal1.com' <jessesharkey@ctulocal1.com>  
**Subject:** Chicago Teachers Union (13-CA-207629 and 13-CA-213316)

Mr. Sharkey,

Please see the attached letter regarding Chicago Teachers Union's failure to file an Answer in the above matter.

**J. Edward Castillo, Esq.** | Field Attorney  
United States Government  
National Labor Relations Board  
Region 13  
219 S. Dearborn Street, Suite 808  
Chicago, IL 60604  
T: 312.353.7586 | F: 312.886.1341

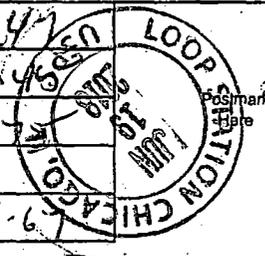
7009 0820 0000 0347 1292

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

**OFFICIAL USE**

Postage	\$ 4.77
Certified Fee	1.34
Return Receipt Fee (Endorsement Required)	2.47
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.67



Sent To: Jesse Sharkey, Vice President  
 Street, Apt. No., or PO Box No.: Chicago Teachers Union  
 City, State, ZIP+4: 1901 W. Carroll Chicago, IL. 60612