

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 16**

SECURITAS SECURITY SERVICES

Respondent,

and

Cases 16-CA-176006

16-CA-183494

RYAN PATRICK MURPHY

Charging Party

**COUNSEL FOR THE GENERAL COUNSEL'S ANSWERING BRIEF TO
RESPONDENT'S EXCEPTIONS TO THE SUPPLEMENTAL DECISION OF THE
ADMINISTRATIVE LAW JUDGE**

I. INTRODUCTION

On August 30, 2019, Administrative Law Judge Donna N. Dawson (the ALJ) issued a decision in this matter in which she concluded that Respondent violated Section 8(a)(1) of the Act by directing an employee not to discuss internal investigations. In reaching this conclusion, the ALJ properly applied extant Board law.

Respondent argues in its Brief in Support of Exceptions, that the ALJ erred in finding that its directive not to discuss internal investigations was necessary in order to preserve the confidentiality of an EEO harassment complaint. The ALJ correctly applied applicable Board law in determining that Respondent's directive to employees not to discuss internal investigations was unlawful because Respondent failed to meet its burden of showing a careful analysis of the necessity for confidentiality in its internal investigation.

Although the ALJ correctly decided the case under extant Board law, the General Counsel contends herein that extant Board law regarding confidentiality directives in the context of internal investigations rests on an unworkable framework. The General Counsel urges the Board to adopt

a new approach to analyzing such matters. Respondent's actions would be lawful if analyzed by the General Counsel's approach and the Complaint would be dismissed.

II. FACTS

In discussing the facts, this brief will describe Respondent's corporate structure and operations and Respondent's directive to the Charging Party not to discuss internal investigations.

A. Respondent's Operations

Respondent is a Delaware corporation operating security services for over 14,000 clients nationwide and internationally (JD slip. op at 2). These services include the provision of security officers at client facilities, the provision of mobile security services, the sale and maintenance of technology products such as cameras and key card access, and the provision of investigative and risk management consultations (Tr. 59-60, LL. 20-3). Respondent's 14,000 clients run the gamut from commercial office buildings to government and military entities and each has different features and unique security requirements (Tr. 61, LL. 9-10). Some of Respondent's clients require Respondent's employees to execute non-disclosure agreements and confidentiality agreements pertaining to activity and operations at their facilities.

Despite client variation in needs, Respondent maintains the same employment policies at all of these facilities. In Austin, Texas, Respondent provides security guard services to Samsung at two commercial office buildings, the Samsung Austin Research Center and the Samsung Austin Semiconductor Plant (JD slip op. at 2, LL. 39-42, Tr. 26, LL. 4-5 and 19-23). Respondent employs about 110 employees at these locations combined (JD slip op. at 2, LL. 43-44, Tr. 26, LL. 9-17, Tr. 26-27, LL. 24-1). Branch Manager Joe Shuler manages Respondent's operations in the Austin area (JD slip op. at 2, L. 43-44, Tr. 27, LL. 16-18). Guards employed at the Samsung facilities received work emails through Samsung accounts (Tr. 32, LL. 9-11). Respondent regularly

communicates with its employees via their Samsung email accounts (Tr. 32, LL. 4-5). Respondent has at least ten guards who work at the Research Center (Tr. 26, LL. 9-17). Guards at the Research Center work in shifts of about three, with two guards and a shift supervisor working together (Tr. 27, LL. 2-10).

B. Respondent Prohibits Employee from Discussing Internal Investigations

On April 26, 2016, after an incident, employee David Brown filed a complaint for race discrimination and Respondent began an investigation into the complaint (JD slip op. at 3, LL. 14-17; Tr. 30, LL. 13-22; Tr. 122-123).¹ Charging Party Ryan Murphy was the only other employee present during the incident (JD slip op. at 3, LL. 16 – 17; Tr. 27, LL. 5-7). While Respondent contends that this incident concerned a discrimination complaint, Murphy testified that he was never made aware that a discrimination complaint had been made (JD slip op. at 3, LL. 18-20; Tr. 45, LL. 2-8). Following the initial investigation of the incident, on May 5, 2016, as Murphy's shift ended, he was interviewed by Branch Manager Joe Shuler and Human Resources Manager Tennille Gray regarding the incident (JD slip op. at 3, LL. 17-18; Tr. 31, LL. 1-5). Murphy testified that following the interview, Shuler and Gray instructed him not to discuss the investigation of the incident with any of his co-workers and also requested that he email them a written statement of his knowledge of the incident (JD slip op. at 3, LL. 20-23; Tr. 31-32). Murphy testified that it was regular practice for employees and managers to communicate via email (Tr. 32, LL. 4-6).

On May 6, 2016, Murphy emailed Gray his written statement regarding the April 26, 2016 incident. In his email, Murphy requested clarification on the prohibition of discussing the investigation, asking specifically:

First, are you barring me and any other officer who is assigned to [the Research Center] from discussing this matter in perpetuity? Is it just while you are

¹ At Respondent's request, little evidence was presented about the nature of the racial discrimination claim or the underlying incident. [Tr. 28, LL. 15-23]

investigating it? Are there specific individuals with whom this bar is attached or is it a blanket prohibition among every security officer? Does the prohibition to talk just include this incident or does it include other work related matters? What is the intent of the prohibition? Does the prohibition only apply during work hours and on site, or am I, and every other officer prohibited from speaking about this incident amongst ourselves regardless of the setting? Lastly, what are the possible ramifications that I or any other office may face if we fail to adhere to this prohibition?

If I don't receive a response, I'll assume that the prohibition to not talk about this incident applies to myself and every officer assigned to [the Research Center] regardless of timing or setting. If this prohibition was in fact [erroneous] it is my hope that I, along with every officer on site...receives education on this matter.

(Tr. 33-34; GC Exh. 2, at 3). Murphy did not receive a response to this email (JD slip op. at 3 – 4; Tr. 34, LL. 7-8).

On May 9, 2016, having received no response from Gray, Murphy emailed Shuler and copied Gray and Marino stating

I never received a direct response regarding the questions below. However, a few hours after I sent my email on May 6th, Ms. Marino pointed out the attached form and instructed me to sign it. I acknowledge that I have received it and that I have read it, but I'm informing you that I will not sign that document under any circumstances.

(JD slip op. at 4, LL. 6-7; Tr. 34, LL. 18-22; GC Exh. 2, at 2).

On May 9, 2016, Gray responded to Murphy's May 6th email stating "all are barred from talking during the time of the investigation in any circumstance," and regarding a closed investigation, "if any one starts conversing about it and those conversations become a distraction to the workplace, anyone involved in conversing could face disciplinary action in accordance with the handbook" (JD slip op. at 4, LL. 10–17; Tr. 12-13; Tr. 38, LL. 13-16; GC Exh. 2, at 1). Gray also responded to Murphy's May 9th email, again reiterating that "all employees are barred from talking during the time of the investigation in any circumstance" and once an investigation is closed employees could face discipline according to the handbook if "conversations become a distraction to the workplace" (JD slip op. at 4, LL. 18-22; Tr. 38-39; GC Exh. 2, at 2). Murphy

testified that his understanding of Gray's email was that he was not allowed to discuss concerns about his working conditions with other employees (JD slip op. at 4, LL. 31-33; Tr. 43, LL. 13-19).

III. ANALYSIS AND DISCUSSION

A. The ALJ properly applied current Board law in finding that Respondent's instruction not to discuss internal investigations is unlawfully overbroad.

The ALJ correctly applied extant Board law to find that Respondent's instruction to its employee not to discuss internal investigation was unlawfully overbroad. (JD slip op. at 9, LL. 31-35). It is well established that rules prohibiting discussion of internal investigations may violate an employee's Section 7 rights. See *Hyundai America Shipping Agency*, 357 NLRB 860 (2011) at 874, *enfd.* in relevant part 805 F.3d 309 (D.C. Cir. 2015) ("investigative confidentiality rule" was so broad and undifferentiated that NLRB reasonably concluded employer did not present a legitimate business justification for it); *See also SNE Enterprises*, 347 NLRB 472, 492-493 (2006); *Kinder-Care Learning Centers*, 299 NLRB 1171, 1172 (1990); *Guardsmark*, 344 NLRB 809 (2005). In *Caesar's Palace*, 336 NLRB 271 (2001), the Board further emphasized that employees have a Section 7 right to discuss discipline or disciplinary investigations involving fellow employees. However, the Board has found that where an employer provides a substantial business justification that outweighs an employee's right to discuss such investigations, a rule prohibiting such discussions may be lawful. *Id.*

In *Caesar's Palace*, the Board found lawful an employer's confidentiality rule regarding discussions of an investigation into criminal drug and fraud allegations because the employer provided substantial business justification in that the rule was necessary to preserve evidence, protect potential witnesses, and to ensure that testimony was not fabricated during the on-going

drug investigation. In that case, the employer provided substantial evidence that threats had been made regarding the investigation and the employer had substantiated concerns that witnesses would be tampered with. Conversely, in *Hyundai America Shipping*, the Board adopted the Administrative Law Judge's finding that blanket bans on discussing internal investigations without first determining whether such confidentiality is truly necessary are unlawful under the Act. 357 NLRB 860, 874 (2011).

In *Banner Health System d/b/a Banner Estrella Medical Center*, 362 NLRB 1108 (2015), the Board held that an employer violated the Act when it requested employees involved in a workplace investigation not to discuss the matter with their co-workers while the investigation was ongoing. The Board reasoned in *Banner Estrella* that employees have a Section 7 right to discuss discipline or ongoing disciplinary investigations involving themselves or co-workers because such conversations are "vital to employees' ability to aid one another in addressing employment terms and conditions with their employer." Id at 1109.

In the instant case, Murphy testified that during his interview with Gray and Shuler regarding the April 26, 2016 incident, he was instructed by Gray and Shuler not to discuss the investigation with anyone (JD slip op. at 3, LL. 21-23; Tr. 31, LL. 19-22). After questioning Respondent's intentions regarding the prohibition, he was broadly directed in writing not to discuss open investigations and was informed that if discussions of closed-investigations became a distraction, employees could face discipline in accordance with the handbook (GC Exh. 2). Here, Respondent provided no limiting language to emphasize the need for confidentiality in the instant investigation but instead broadly prohibited discussion of open investigations and further prohibited discussions of closed investigations where the conversation became "distracting." (JD slip op. at 4, LL. 10-17). Nor did Respondent provide the requisite specifics to establish a

justification for its gag rule as did the employer in *Caesar's Palace*, supra. Far from specifics about criminal concerns and fraud brought to light in *Caesar's Palace*, Respondent here sought to keep the record vague as to the "incident" at issue². Accordingly, Respondent failed to provide a legitimate justification for the blanket prohibition and the ALJ rightfully determined that the directive is unlawfully overbroad. (JD slip op. at 7, LL. 6-8) Moreover, while Respondent argues that the ALJ failed to consider EEOC requirements that employers keep investigations concerning allegations of harassment confidential, Respondent has provided no evidence that the April 26 incident was being investigated as a harassment claim, but rather asserts broadly that the employee complained of discrimination (JD slip op. at 8, LL. 31-40, Tr. 122-123) and further refused to allow information about the incident to be put into the record (Tr. 28-30). Under these circumstances, Respondent has not met its burden under extant law.

B. The Board May Find that *Banner Estrella* is Unworkable with the Board's recent decision in *The Boeing Company*.³

It is the General Counsel's view that the standard articulated by the panel majority in *Banner Estrella* is unworkable and fails to give appropriate weight to the shared employee and national interests furthered by the maintenance of confidentiality in the course of sensitive workplace investigations. Instead, by requiring a showing of particularized need and by projecting and elevating to a controlling status the comparatively slight and speculative Section 7 interests related to investigations concerning sensitive matters, *Banner Estrella* undermines collective employee interests and the national good. It is the General Counsel's position that such rules or policies are better analyzed under the Board's recent decision in *The Boeing Company*.

² If the incident and the complaint were truly sensitive, Respondent could have entered evidence regarding the incident under a protective order.

³ 365 NLRB No. 154 (Dec. 14, 2017)

In so saying, it should be understood that the General Counsel remains a strong advocate for individual employee rights, particularly as those rights relate to treatment of employees by employers and labor organizations. But, individual employee rights include the right to be free of employment discrimination, harassment on the job, workplace violence, unsafe working conditions, and invasions of privacy, among other evils. And while employees' Section 7 interests are undoubtedly served by protecting the collective right to share information about wages and benefits and discipline, it elevates form over substance to ignore employees' countervailing collective interest in efficient and effective workplace investigations into matters that vitally affect their day-to-day interests on the job. Indeed, on the narrow issue of confidentiality in workplace investigations, the Board seems to stand alone in its current, single-minded adherence to the notion that its expansive and questionable vision of rights under the NLRA should trump the countervailing federal and national interests reflected in the employment statutes administered by other agencies. The General Counsel believes and respectfully submits that it is possible to accommodate the important rights under our Act to those bestowed by federal statutes and laws of equal dignity and import, and that the collective interests of employees will be better served by doing so.

For these reasons, and those set forth hereinafter, the General Counsel respectfully urges the Board find Respondent's restriction on discussing internal investigations lawful under *Boeing*. Inasmuch as *Banner Estrella* is inconsistent with the Board's recent decision in *Boeing*, governing employer work rules, it would be appropriate for the Board to apply *Boeing* to confidentiality-in-workplace-investigations rules or policies, such as those here, rather than *Banner Estrella*, and to balance (i) the nature and extent of the potential impact on employee rights under the Act against (ii) employers' legitimate business interests. Because employers' interests in maintaining

confidentiality in workplace investigations are substantial and such rules also benefit employees, while only potentially affecting peripheral Section 7 rights, these rules should be considered *Boeing* Category 1 rules, and employers should be permitted to apply them to all workplace investigations without determining, on a case-by-case basis, whether confidentiality is needed in that particular investigation.

For the reasons discussed below, the General Counsel is of the view that *Banner Estrella* was superseded by the Board's *Boeing* decision. The General Counsel respectfully submits that the Board evaluate the charge allegations under *Boeing* and find that Respondent's instructions not to discuss internal investigations were a lawful Category 1 rule under the Board's new standard for evaluating workplace rules enunciated in *Boeing*.

1. *Boeing's* Standard for Evaluating Workplace Rules Displaces *Banner Estrella*.

Two years after *Banner Estrella*, the Board in *Boeing* established a new standard for evaluating whether an employer's mere maintenance of a work rule violates Section 8(a)(1) of the Act. Rejecting *Lutheran Heritage's* "reasonably construe" standard that improperly limited the Board's own discretion and failed to account for any legitimate justifications associated with workplace policies, the Board embraced its responsibility to balance employees' ability to exercise their Section 7 rights with an employer's right to maintain discipline and productivity in the workplace. 365 NLRB No. 154, slip op. at 2. Under the *Boeing* standard, the Board balances (i) the nature and extent of the potential impact on NLRA rights and (ii) legitimate justifications associated with the rule. *Id.* at 3. Applying the new standard, the Board found that the employer's justifications for a rule restricting camera-enabled devices on company property—which, among other things, assisted the company with its federally mandated duty to prevent unauthorized

disclosure of information implicating national security—outweighed the rule’s more limited adverse effect on the exercise of Section 7 rights. *Id.* at 5, 17-19.

In addition to properly balancing employee rights and employer business justifications, the *Boeing* test accommodates the Board’s responsibility to harmonize the Act with other statutory schemes and to provide parties with sufficient certainty and clarity regarding their rights and obligations. Regarding the latter, the *Boeing* Board recognized that *employees* are disadvantaged when employers cannot implement and maintain predictable policies and rules that allow employees to know the standards of conduct to which they will be held. *Id.* at 2, 7, 10 (citations omitted).

Surveying the Board’s inconsistent precedent governing workplace rules, the *Boeing* Board cited with approval *Caesar’s Palace*, 336 NLRB 271, 272 (2001), in which it had upheld an employer’s confidentiality rule prohibiting discussion of an ongoing investigation of alleged illegal drug activity in the workplace, after explicitly balancing employees’ Section 7 rights against the employer’s business justifications. *See Boeing*, slip op. at 8. While the *Caesar’s Palace* Board acknowledged that the employer’s confidentiality rule to some extent limited employees’ right to engage in protected discussions regarding discipline or disciplinary investigations involving fellow employees, the Board found that any adverse effect was explicitly outweighed by the employer’s asserted legitimate and substantial business justifications, including guarding witnesses from retaliation and violence, protecting evidence, and maintaining accurate testimony. 336 NLRB at 272.

The standard described in *Banner Estrella*, which requires employers themselves to evaluate the need for confidentiality for each workplace investigation on a case-by-case basis, is at odds with the Board’s responsibility to balance an employer’s justification for a work rule

against any potential effect on employees' Section 7 interests. *See Boeing*, slip op. at 7 (recognizing that the Supreme Court has repeatedly required the Board to weigh an employer's interests in a work restriction with the potential impact on NLRA-protected activities) (citations omitted). Further, by forcing employers to engage in a case-by-case analysis, the *Banner Estrella* approach provides little clarity regarding when confidentiality-in-workplace-investigations rules will survive the Board's review, deprives well-meaning employers of the opportunity to create rules that can be consistently applied to workplace investigations and, finally, ignores the fact that *employees* would benefit from predictable workplace policies rather than haphazard determinations in each workplace investigation. *See, e.g.*, Stephen W. Lyman, *Confidential Workplace Investigations – a Dilemma for Employers*, HR Insights for Health Care, July 28, 2015, <https://www.hallrender.com/2015/07/28/confidential-workplace-investigations-a-dilemma-for-employers/>. Indeed, there are fewer employees in need of clear guidance on confidentiality than those involved in workplace investigations. Thus, the Administrative Law Judge should take this opportunity to acknowledge clearly the substantial employer interests in, and employee benefits from, confidential investigations and hold that confidentiality-in-workplace-investigations rules are lawful Category 1 rules under *Boeing*.⁴

2. Applying *Boeing*, Respondent's instruction not to discuss internal investigations should be found lawful.

Respondent's instruction not to discuss internal investigations should be found lawful because Respondent's legitimate and substantial business justifications for the instruction outweigh the comparatively slight impact on employees' NLRA rights. Specifically, the General

⁴ Of course, even if rules are facially lawful, the *Boeing* Board made clear that application of an otherwise lawful rule may still be unlawful. The Board explained that "even when a rule's *maintenance* is deemed lawful, the Board will examine the circumstances where the rule is *applied* to discipline employees who have engaged in NLRA-protected activity," and in such cases, the application of the rule may violate the Act. *Boeing*, slip op. at 5.

Counsel urges the Board to find that Respondent's instruction, and confidentiality-of-workplace-investigation rules in general, is lawful because employers have strong interests in protecting the integrity of workplace investigations, complying with other federal and state laws that require confidential investigations, and maintaining workplaces free from harassment, abuse, and danger, which in turn benefit employees themselves, and these interests outweigh the minimal impact that these rules have on Section 7 rights.

While these kinds of rules impact an employee's ability to discuss the specifics of what was asked or answered in an investigation and therefore could potentially adversely affect employees' Section 7 right to discuss their own or other employees' discipline or disciplinary investigations, *see, e.g., Caesar's Palace*, 336 NLRB at 272, they do not preclude core Section 7 activity like union organizing or discussions amongst employees about essential workplace issues like wages, benefits, or disciplinary policies, or even the subject matter of an investigation.⁵ Such rules also do not preclude discussions with an employee's union or the utilization of an employee's *Weingarten* rights. *See Banner Estrella*, slip op. at 8 (Member Miscimarra, dissenting in part (confidentiality in investigations rule did not unreasonably interfere with Section 7 activity in part because employee not restricted from discussions with union representatives and no denial of *Weingarten* rights). Furthermore, the vast majority of workplace investigations involve allegations of illegal or unethical behavior that are clearly unprotected by Section 7. *See id.*, slip op. at 14-17 & 16 n.60. Indeed, Respondent's instruction not to discuss internal investigations was in order to protect the integrity of an investigation of a racial discrimination complaint. In contrast to the comparatively slight impact that these rules may potentially have on Section 7, employees have a strong interest in safe work spaces—including work environments free from harassment and abuse,

⁵ To the extent an employer's rule reaches matters beyond a particular investigation, it could contain an unlawful limitation on employees' Section 7 rights.

and protection from retaliation—that result from employees’ ability to confidentially report workplace misconduct.

Employer interests in requiring confidentiality in workplace investigations alone clearly outweigh employees’ peripheral Section 7 interest in disclosing matters they discussed or discovered in workplace investigations. Some of those interests are discussed at length above. In addition, Respondent’s asserted business justifications for instructing employees not to discuss internal investigations reflect interests that are common to all employers. First, Respondent claims that the instruction was necessary to protect employee privacy following a complaint of racial discrimination. Requiring such confidentiality provides some protection against suspects divulging what they learned in investigatory interviews, or from sharing their stories with coworkers to influence what others will say, especially at the beginning of an investigation. Second, Respondent states that its employee asked for confidentiality and, by providing assurances of such, Respondent could provide safe harbor to the complaining employee.

Confidentiality is often cited as a best practice for exactly these types of concerns—to encourage victims to report allegations of sexual harassment or other illegal behavior and provide cover to witnesses who can substantiate such allegations. And, reducing workplace harassment also benefits businesses with increased productivity, fewer employee absences, and smaller turnover. See *The Cost of Sexual Harassment in the Workplace*, <https://www.yourerc.com/blog/post/the-cost-of-sexual-harassment-in-the-workplace> (last visited Jan. 29, 2019) (“sexual harassment makes it harder for everyone in the company to get their work done in ways big and small, and *that* (*not* legal bills) is what will likely cost the employer the most money in the long run”) (emphasis in the original). It is reasonable to expect that employees are

more likely to report wrongdoing and cooperate in employer investigations when employers can ensure confidentiality.

Here, the Board should strike the balance in favor of the strong interests of Respondent in maintaining confidentiality in investigations. In this regard, Respondent's asserted justifications for its instruction not to discuss internal investigations are legitimate, substantial, and compelling reasons for Respondent and all employers to lawfully prohibit employees from divulging information gathered in workplace investigations. Since all employers share Respondent's compelling reasons for maintaining rules requiring confidentiality in workplace investigations, such rules should be designated as *Boeing* Category 1 rules that do not require another case-specific analysis in order to determine their legality. Striking the balance in favor of the legality of such rules also inures to the benefit of employees who will know, when deciding whether to report workplace misconduct and/or at the outset of any investigation, that they will be assured confidentiality and/or will be required to maintain confidentiality.

As discussed above, confidential investigations benefit employees by encouraging employee victims and witnesses to report misconduct without fear of retaliation, thereby allowing employees to not only address wrongs done to them personally, but also to potentially remove those harms from the workplace to the benefit of all employees. See *Know Your Rights at Work: Sexual Harassment Employees' Guide: Sexually Harassed—What Should I do Next?*, American Association of University Women, <https://www.aauw.org/what-we-do/legal-resources/know-your-rights-at-work/workplace-sexual-harassment/employees-guide/> (last visited Jan. 29, 2019) (“[t]he courageous act of reporting can change your employment culture and help to create more inclusive social norms at work”). This objective can only be supported if we reject the case-by-

case approach of *Banner Estrella* and permit employers to have a general policy of confidential workplace investigations that encourages employees to come forward.

IV. CONCLUSION

Accordingly, weighing the legitimate, substantial, and compelling business justifications for Respondent's instruction not to discuss internal investigations, and the benefits such instructions accord employees, against the comparatively slight impact on Section 7 activity, Respondent's instruction should be found, like other confidentiality-in-investigation rules, to be a lawful Category 1 rule, so long as the rules confine themselves to information discussed or discovered in the investigation. The Board should set aside *Banner Estrella*, apply *Boeing*, and dismiss the Complaint allegations that the instruction not to discuss internal investigations unlawfully interfered with employees' Section 7 rights.

Respectfully submitted,



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CERTIFICATE OF SERVICE

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