DECISION AND DIRECTION OF ELECTION

Upon a petition duly filed under Section 9(c) of the National Labor Relations Act, hereinafter referred to as the Act, as amended, a hearing was held on January 30, 2020, before a hearing officer of the National Labor Relations Board, hereinafter referred to as the Board, to determine an appropriate unit for collective bargaining.1

I. ISSUE

Petitioner filed a petition seeking to represent a wall-to-wall unit of all full-time and regular part-time landfill employees but excluding the site manager and security guard. The petitioned-for unit would include all heavy equipment operators, laborers, tippers, spotter-drivers, and office scale clerks employed by the Employer at its Atkinson, Illinois, facility. The Employer maintains that the unit sought by Petitioner is not appropriate because the laborers, tippers, spotter-drivers and office scale clerks should be excluded from the unit because they do not share a sufficient community of interest with the heavy equipment operators. The Employer also contended that the office scale clerk was an office clerical employee. Petitioner and the Employer agreed at the hearing that the appropriate unit should include heavy equipment operators and exclude managerial employees, office clerical employees, guards and supervisors as defined in the Act, and all other employees. Petitioner and the Employer further agreed that the office scale clerk was an office clerical employee and should be excluded from the unit. Thus, the remaining issue is whether the laborers, tippers, and spotter-drivers share a sufficient community of interest with the heavy equipment operators.

1 Upon the entire record in this proceeding, the undersigned finds:
   a. The hearing officer’s rulings made at the hearing are free from error and are hereby affirmed.
   b. The Employer is engaged in commerce within the meaning of the Act and it will effectuate the purposes of the Act to assert jurisdiction herein.
   c. The labor organization involved claims to represent certain employees of the Employer.
   d. A question affecting commerce exists concerning the representation of certain employees of the employer within the meaning of Section 9(c)(1) and Section 2(6) and (7) of the Act.
community of interest with the heavy equipment operators to warrant their inclusion in the appropriate unit.

II. DECISION

Based on the record and relevant Board cases, I am directing an election in this matter be held because a question concerning representation exists under Section 9(c) of the Act. I conclude that a unit comprised of all heavy equipment operators, laborers, tippers, and spotter-drivers employed by the Employer at its Atkinson, Illinois facility is appropriate for collective bargaining.

Thus, the following constitutes a unit appropriate for purposes of collective bargaining:

All full-time and regular part-time landfill employees, including heavy equipment operators, laborers, tippers, and spotter-drivers, employed by the Employer at its Atkinson, Illinois facility; BUT EXCLUDING all managerial employees, office clerical employees, office scale clerks, guards and supervisors as defined in the Act, and all other employees.

The unit found appropriate herein consists of approximately 16 employees for whom no history of collective bargaining exists.

III. THE EMPLOYER’S OPERATION

The Employer operates a landfill spanning approximately 200 acres in Atkinson, Illinois. The Employer acquired the facility in June 2019 from the previous owner and, after a period of preparations to meet the Employer’s operational standards, started operations on November 4, 2019. The Employer retained three of the five employees who had previously worked at the facility, and since has added an additional fifteen employees for a total of eighteen. Currently, there are seven employees classified as heavy equipment operators, five as laborers, two as tippers, and two as spotter-drivers. There is one office scale clerk who the parties agreed is an excluded office clerical employee and one night watchman/security guard who is also excluded from the unit. James Allen is the Site Manager and is responsible for overseeing the day-to-day operations at the facility.

The Employer is currently operating in one EPA-permitted “cell” (referred to as Cell B), but there are plans to expand into other cells in the future. The Employer receives the majority of its trash from transfer stations around the Chicago area but also receives some trash from local haulers as well. Customers who are delivering trash to the facility will either leave the trailer containing the trash at the “drop yard” near the entrance to the facility or continue directly to Cell B to drop the trash there; approximately 80% of the customers proceed directly to Cell B, while the remainder will leave their trailers at the drop yard (these are typically customers who arrive over night after the Employer’s facility has closed). For trailers that are left at the drop yard, one of the Employer’s spotter-drivers will collect the trailer using an employer-owned tractor to deliver the trash to Cell B. Whether being directly delivered by the customer to Cell B
or by a spotter-driver from the drop yard, trailers that are tarped (most are to avoid trash escaping during the trip from Chicago to the facility) will stop at the “tarping station” where a laborer will roll up the tarp before the trailer proceeds to Cell B. At Cell B some customers are able to dump directly into the cell, while others will use the assistance of a tipper machine; trailers from the drop yard and driven by the Employer’s spotter-drivers always utilize the tipper. There are two tipper machines and they are operated by the Employer’s two tipper employees, although the actual operation of the machine is fairly simple and consists of pushing a button to raise the trash trailer up to a 45-degree angle and then pressing another button to lower the trailer back down after the trash has been dumped into the cell.

Heavy equipment operators are responsible for “encapsulating” the trash, or spreading and compacting it around the cell to ensure it meets the Employer’s and EPA standards; the operators use equipment such as bulldozers and compactors to accomplish this task. Heavy equipment operators will also utilize an excavator and a haul truck to move material (presumably dirt or other cover material) from other locations around the Employer’s facility into Cell B to help cover the trash.

IV. BOARD LAW

When determining an appropriate unit, the Board delineates the grouping of employees within which freedom of choice may be given collective expression. At the same time, it creates the context within which the process of collective bargaining must function. Therefore, each unit determination must foster efficient and stable collective bargaining. Gustave Fisher, Inc., 256 NLRB 1069 (1981). On the other hand, the Board has also made clear that the unit sought for collective bargaining need only be an appropriate unit. Thus, the unit sought need not be the ultimate, or the only, or even the most appropriate unit. Overnite Transportation Co., 322 NLRB 723, at 723 (1996). As a result, in deciding the appropriate unit, the Board first considers whether the unit sought in a petition is appropriate. Id.

When deciding whether the unit sought in a petition is appropriate, the Board focuses on whether the employees share a “community of interest.” NLRB v. Action Automotive, 469 U.S. 490, 494 (1985). In turn, when deciding whether a group of employees shares a community of interest, the Board considers whether the employees sought are organized into a separate department; have distinct skills and training; have distinct job functions and perform distinct work, including inquiry into the amount and type of job overlap between classifications; are functionally integrated with the Employer’s other employees; have frequent contact with other employees; interchange with other employees; have distinct terms and conditions of employment; and are separately supervised. PCC Structurals, Inc., 365 NLRB No. 160 (Dec. 15, 2017); United Operations, Inc., 338 NLRB 123 (2002). Analyzing community-of-interest factors is a three-step process: (1) does the proposed unit share an internal community of interest, (2) the shared and distinct interests of those employees within the proposed unit and those excluded must be compared, and (3) other special considerations must be addressed. The Boeing Co., 368 NLRB No. 67 (Sept. 9, 2019). Particularly important in considering whether the unit sought is appropriate are the organization of the plant and the utilization of skills. Gustave Fisher, Inc., supra at fn. 5. With regard to organization of the plant, the Board has made clear
that it will not approve of fractured units—that is, combinations of employees that are too narrow in scope or that have no rational basis. *Seaboard Marine*, 327 NLRB 556 (1999). However, *all* relevant factors must be weighed in determining community of interest.

V. APPLICATION OF BOARD LAW TO THE FACTS OF THIS CASE

As discussed in more detail below, I find that the petitioned-for unit\(^2\) is appropriate in that it shares an internal community of interest and the exclusions from the unit proposed by the Employer do not share sufficiently distinct interests to justify excluding them.

a. Organization of the Plant

An important consideration in any unit determination is whether the proposed unit conforms to an administrative function or grouping of an employer’s operation. Thus, for example, generally the Board would not approve a unit consisting of some, but not all, of an employer’s production and maintenance employees. *See Check Printers, Inc.* 205 NLRB 33 (1973). However, in certain circumstances, the Board will approve a unit in spite of the fact that other employees in the same administrative grouping are excluded. *Home Depot USA*, 331 NLRB 1289, 1289 and 1291 (2000). That said, the Board has historically found that a plantwide or overall unit is presumptively appropriate, and the party contending that such a unit is inappropriate bears the burden of rebutting that presumption. *See, e.g.*, *Airco, Inc.*, 273 NLRB 348, 359 (1984).

In this case, Petitioner seeks a presumptively appropriate wall-to-wall unit of all the Employer’s landfill employees. The heavy equipment operators, laborers, tippers, and spotter-drivers all work within a singular administrative grouping under the supervision of James Allen. There are no other employees at the Employer’s Atkinson facility who are not covered by the petitioned-for unit\(^3\), so there is no concern about the possibility of creating fractured units. In these circumstances, the Employer has not overcome its burden of rebutting the wall-to-wall appropriate unit presumption, and this factor weighs strongly in favor of proceeding to an election in the petitioned-for unit.

b. Interchangeability and Contact among Employees

Interchangeability refers to temporary work assignments or transfers between two groups of employees. Frequent interchange “may suggest blurred departmental lines and a truly fluid work force with roughly comparable skills.” *Hilton Hotel Corp.*, 287 NLRB 359, 360 (1987).

\(^2\) References to the petitioned-for unit herein refer to the unit sought by Petitioner at the hearing which excludes the classification of office scale clerk.

\(^3\) As set forth above, there are two other employees at the facility, the office scale clerk and the night watchman/security guard, but Petitioner and the Employer agree that those two classifications should be excluded from the unit because the former is an office clerical employee and the latter is a guard.
As a result, the Board has held that the frequency of employee interchange is a critical factor in determining whether employees who work in different groups share a community of interest sufficient to justify their inclusion in a single bargaining unit. *Executive Resource Associates*, 301 NLRB 400, 401 (1991), citing *Spring City Knitting Co. v. NLRB*, 647 F.2d 1011, 1015 (9th Cir. 1981). In this case, the record reveals a limited amount of employee interchange between the employees the parties agree are in the unit and the employees the Employer seeks to exclude. The heavy equipment operators primarily operate the heavy equipment, tippers primarily only operate the tipping machines, spotter-drivers primarily use tractors to drive the trailers up to Cell B to dump the trash, and the laborers perform various other tasks around the landfill. However, heavy equipment operators will, on occasion, operate equipment that other classifications also operate, such as the lull forklift and the street sweeper, so there is some evidence of interchangeability among the various employees.

Also relevant for consideration with regard to interchangeability is whether there are permanent transfers among employees in the unit sought by a union. However, the existence of permanent transfers is not as important as evidence of temporary interchange. *Hilton Hotel Corp*, supra. In this matter the record reveals some evidence of permanent transfers between the employees the parties agree are in the unit and the employees the Employer seeks to exclude. More specifically, spotter-driver Cody Leamen is in the process of being trained as a heavy equipment operator, and laborer Ryan DeMuyck is, in turn, being trained as a spotter-driver; based on the record, it appears that both employees are regularly performing their new duties and these permanent transfers are expected to be effected in the very near future.

Also relevant is the amount of work-related contact among employees, including whether they work beside one another. Thus, it is important to compare the amount of contact employees in the unit sought by a union have with one another. See for example, *Casino Aztar*, 349 NLRB 603, 605-606 (2007). There is evidence of a not insignificant amount of work-related contact between the employees the parties agree are in the unit and the employees the Employer seeks to exclude, as well as evidence that the two groups of employees work in the same areas. Thus, heavy equipment operators are regularly communicating with the tippers to ensure the trailers are safely dumping trash into Cell B. Spotter-drivers will also have communication with heavy equipment operators, although to a lesser extent, to confirm that trash has been successfully removed from the trailers. The evidence also shows that heavy equipment operators will communicate with laborers to instruct them on which jobs need to be performed that day. Heavy equipment operators and laborers also work together to clean the tracks or wheels of the equipment at the end of each day, as well as to tarp and untarp Cell B overnight to help secure the trash.

c. Common Supervision

Another community-of-interest factor is whether the employees in dispute are commonly supervised. In examining supervision, most important is the identity of employees’ supervisors who have the authority to hire, to fire or to discipline employees (or effectively recommend those actions) or to supervise the day-to-day work of employees, including rating performance, directing and assigning work, scheduling work, and providing guidance on a day-to-day basis.
Common supervision weighs in favor of placing the employees in dispute in one unit. However, the fact that two groups are commonly supervised does not mandate that they be included in the same unit, particularly where there is no evidence of interchange, contact or functional integration. United Operations, supra at 125. Similarly, the fact that two groups of employees are separately supervised weighs in favor of finding against their inclusion in the same unit. However, separate supervision does not mandate separate units. Casino Aztar, supra at 607, n. 11. Rather, more important is the degree of interchange, contact and functional integration. Id. at 607.

In this case, the record reveals that the employees the parties agree are in the unit and the employees the Employer seeks to exclude from the unit share common supervision. More specifically, all of the employees at the Employer’s facility are supervised by James Allen. While Allen may, in turn, contact Jerry Golf, Vice President of Landfill Operations, for approval when making discharge decisions, for example, the record is clear that Allen is in charge of the day-to-day operations at the landfill. Allen was responsible for making the ultimate decision to hire all of the Employer’s employees, and he speaks with the employees daily to talk about how things are going and what the plan is going forward. Allen will also visit Cell B nearly every day to observe how things are progressing and talk to the employees who work there, while other employees he will speak to by radio. Allen also directs the laborers in the day-to-day functions and lets them know whether, for example, they will be picking up loose trash around the landfill, moving fences to help contain the trash, or performing general landscaping functions. Allen has the authority to discipline, although the record does not reflect that such authority has ever been exercised. Given these facts and that Allen is the only supervisor on-site daily, this factor weighs in favor of finding that a community of interest exists among the petitioned-for employees.

d. The Nature of Employee Skills and Functions

This factor examines whether disputed employees can be distinguished from one another on the basis of job functions, duties or skills. If they cannot be distinguished, this factor weighs in favor of including the disputed employees in one unit. Evidence that employees perform the same basic function or have the same duties, that there is a high degree of overlap in job functions or of performing one another’s work, or that disputed employees work together as a crew, support a finding of similarity of functions. Evidence that disputed employees have similar requirements to obtain employment; that they have similar job descriptions or licensure requirements; that they participate in the same Employer training programs; and/or that they use similar equipment supports a finding of similarity of skills. Casino Aztar, 349 NLRB 603 (2007); J.C. Penny Company, Inc., 328 NLRB 766 (1999); Brand Precision Services, 313 NLRB 657 (1994); Phoenician, 308 NLRB 826 (1992). Where there is also evidence of similar terms and conditions of employment and some functional integration, evidence of similar skills and functions can lead to a conclusion that disputed employees must be in the same unit, in spite of lack of common supervision or evidence of interchange. Phoenician, supra.

In this case the record reveals that employees the parties agree are in the unit have separate job functions, duties and skills from the employees the Employer contends must be
excluded from the unit. For example, the functions performed by heavy equipment operators have minimal overlap with those performed by laborers. Spotter-drivers have slightly more similar functions to heavy equipment operators in that they are driving eighteen-wheel tractor-trailers. However, beyond the differences in job duties, all of the employees work together as a crew to accomplish the Employer’s mission, from the laborers who secure loose trash around the facility to spotter-drivers and tippers who help deposit the trash into Cell B to the heavy equipment operators who encapsulate the trash in Cell B. Although the heavy equipment operators utilize more advanced equipment like an excavator or a bulldozer, there is no special education or certification needed to qualify for that position other than experience. In fact, some pieces of equipment, such as the lull forklift and the street sweeper have been operated by several classifications, including both laborers and heavy equipment operators. All of the employees attend monthly safety meetings together, although attendance may be broken into two groups (not based on job classification) for convenience.

e. Degree of Functional Integration

Functional integration refers to when employees’ work constitutes integral elements of an employer’s production process or business. Thus, for example, functional integration exists when employees in a unit sought by a union work on different phases of the same product or as a group provides a service. Another example of functional integration occurs when the employer’s workflow involves all employees in a unit sought by a union. Evidence that employees work together on the same matters, have frequent contact with one another, and perform similar functions is relevant when examining whether functional integration exists. *Transerv Systems*, 311 NLRB 766 (1993). On the other hand, if functional integration does not result in contact among employees in the unit sought by a union, the existence of functional integration has less weight.

In this matter, the record reveals that the employees the parties agree are in the unit and the employees the Employer maintains should be excluded share a significant amount of functional integration. For example, spotter-drivers collect trailers from the drop yard before driving them to the tarping station where a laborer will remove the tarp from the trailer. The spotter-driver will then continue on to Cell B, where they will load the trailer onto a tipper machine. One of the tipper employees will then coordinate with a nearby heavy equipment operator to make sure the area is clear before raising the trailer to tip out the trash. In the event that trash gets stuck in the trailer, the tipper will lower the trailer and the spotter-driver will pull the trailer aside until a heavy equipment operator with an excavator can arrive to remove the stuck trash. Once trash is dropped into Cell B, heavy equipment operators will work together to spread the trash evenly around the cell and to cover it with cover material such as dirt. Laborers assist with keeping the trash inside Cell B by either picking up loose trash around the landfill or installing different types of fencing to help secure the trash. Beyond the actual processing of the trash, laborers and heavy equipment operators work together to, for example, maintain the equipment in the morning and clean out the tracks or tires of the vehicles at the end of the day.

Certainly, some employees may have limited contact with other classifications or may not directly interact with other classifications on a daily basis. However, the significant amount
of integration that does exist between the bulk of the employees in the classification in the petitioned-for unit supports a finding of a community of interest.

f. Terms and Conditions of Employment

Terms and conditions of employment include whether employees receive similar wage ranges and are paid in a similar fashion (for example hourly); whether employees have the same fringe benefits; and whether employees are subject to the same work rules, disciplinary policies and other terms of employment that might be described in an employee handbook. However, the facts that employees share common wage ranges and benefits or are subject to common work rules does not warrant a conclusion that a community of interest exists where employees are separately supervised, do not interchange and/or work in a physically separate area. Bradley Steel, Inc., 342 NLRB 215 (2004); Overnite Transportation Company, 322 NLRB 347 (1996). Similarly, sharing a common personnel system for hiring, background checks and training, as well as the same package of benefits, does not warrant a conclusion that a community of interest exists where two classifications of employees have little else in common. American Security Corporation, 221 NLRB 1145 (1996).

In the instant case the record reveals that employees who the Employer argues must be excluded from the unit share many common terms and conditions of employment with employees who the parties agree are in the unit. These include a common employee handbook, the same amount of vacation benefits, and the same fringe benefits such as health and dental benefits. All of the employees work full-time, Monday through Friday, and all are eligible for overtime pay (all employees typically work more than 40 hours per week). Even though employees’ start times may vary, there is no particular distinction made by classification; for example, a laborer may start at the same time as a heavy equipment operator. The employee wage rates exhibit a range based upon the skill needed to perform the job, with laborers making $16 per hour, spotter-drivers making $20-22, tippers making $22-24, and heavy equipment operators making $24 per hour. On the whole, this factor also weighs in favor of finding a community of interest among the petitioned-for employees.

In determining that the unit sought by Petitioner is appropriate, I have carefully weighed the community-of-interest factors cited in PCC Structural, supra. I conclude that the unit sought by Petitioner is appropriate because the record reveals that the employer has not rebutted the presumptively appropriate wall-to-wall unit petitioned for by Petitioner. Further, the factors of common supervision, functional integration, and terms and conditions of employment weigh strongly in favor of finding the petitioned-for unit shares a community of interest, with the other factors supporting that conclusion to a lesser extent.

VI. CONCLUSION

In view of the foregoing and record as a whole, I find that the following employees of the Employer constitute a unit appropriate for the purpose of collective bargaining within the meaning of Section 9(b) of the Act:
All full-time and regular part-time landfill employees, including heavy equipment operators, laborers, tippers, and spotter-drivers, employed by the Employer at its Atkinson, Illinois, facility; BUT EXCLUDING all managerial employees, office clerical employees, office scale clerks, guards and supervisors as defined in the Act, and all other employees.

VII. DIRECTION OF ELECTION

The National Labor Relations Board will conduct a secret ballot election among the employees in the unit found appropriate above. Employees will vote whether or not they wish to be represented for purposes of collective bargaining by International Union of Operating Engineers Local No. 649.

a. Election Details

The election will be held on February 19, 2020 from 9:00 a.m. to 11:00 a.m. in the breakroom of the maintenance shop at the Employer’s facility located at 137 Commercial Drive, Atkinson, Illinois.

b. Voting Eligibility

Eligible to vote are those in the unit who were employed during the payroll period ending February 8, 2020, including employees who did not work during that period because they were ill, on vacation, or temporarily laid off.

Employees engaged in an economic strike, who have retained their status as strikers and who have not been permanently replaced, are also eligible to vote. In addition, in an economic strike that commenced less than 12 months before the election date, employees engaged in such strike who have retained their status as strikers but who have been permanently replaced, as well as their replacements, are eligible to vote. Unit employees in the military services of the United States may vote if they appear in person at the polls.

Ineligible to vote are (1) employees who have quit or been discharged for cause since the designated payroll period; (2) striking employees who have been discharged for cause since the strike began and who have not been rehired or reinstated before the election date; and (3) employees who are engaged in an economic strike that began more than 12 months before the election date and who have been permanently replaced.

c. Voter List

As required by Section 102.67(l) of the Board’s Rules and Regulations, the Employer must provide the Regional Director and parties named in this decision a list of the full names, work locations, shifts, job classifications, and contact information (including home addresses,
available personal email addresses, and available home and personal cell telephone numbers) of all eligible voters.

To be timely filed and served, the list must be received by the regional director and the parties by **Friday, February 14, 2020.** The list must be accompanied by a certificate of service showing service on all parties. **The region will no longer serve the voter list.**

Unless the Employer certifies that it does not possess the capacity to produce the list in the required form, the list must be provided in a table in a Microsoft Word file (.doc or docx) or a file that is compatible with Microsoft Word (.doc or docx). The first column of the list must begin with each employee’s last name and the list must be alphabetized (overall or by department) by last name. Because the list will be used during the election, the font size of the list must be the equivalent of Times New Roman 10 or larger. That font does not need to be used but the font must be that size or larger. A sample, optional form for the list is provided on the NLRB website at [www.nlrb.gov/what-we-do/conduct-elections/representation-case-rules-effective-april-14-2015](http://www.nlrb.gov/what-we-do/conduct-elections/representation-case-rules-effective-april-14-2015).

When feasible, the list shall be filed electronically with the Region and served electronically on the other parties named in this decision. The list may be electronically filed with the Region by using the E-filing system on the Agency’s website at [www.nlrb.gov](http://www.nlrb.gov). Once the website is accessed, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions.

Failure to comply with the above requirements will be grounds for setting aside the election whenever proper and timely objections are filed. However, the Employer may not object to the failure to file or serve the list within the specified time or in the proper format if it is responsible for the failure.

No party shall use the voter list for purposes other than the representation proceeding, Board proceedings arising from it, and related matters.

d. Posting of Notices of Election

Pursuant to Section 102.67(k) of the Board’s Rules, the Employer must post copies of the Notice of Election accompanying this Decision in conspicuous places, including all places where notices to employees in the unit found appropriate are customarily posted. The Notice must be posted so all pages of the Notice are simultaneously visible. In addition, if the Employer customarily communicates electronically with some or all of the employees in the unit found appropriate, the Employer must also distribute the Notice of Election electronically to those employees. The Employer must post copies of the Notice at least 3 full working days prior to 12:01 a.m. of the day of the election and copies must remain posted until the end of the election. For purposes of posting, working day means an entire 24-hour period excluding Saturdays, Sundays, and holidays. However, a party shall be estopped from objecting to the nonposting of notices if it is responsible for the nonposting, and likewise shall be estopped from objecting to the nondistribution of notices if it is responsible for the nondistribution.
Failure to follow the posting requirements set forth above will be grounds for setting aside the election if proper and timely objections are filed.

VIII. RIGHT TO REQUEST REVIEW

Pursuant to Section 102.67 of the Board’s Rules and Regulations, a request for review may be filed with the Board at any time following the issuance of this Decision until 14 days after a final disposition of the proceeding by the Regional Director. Accordingly, a party is not precluded from filing a request for review of this decision after the election on the grounds that it did not file a request for review of this Decision prior to the election. The request for review must conform to the requirements of Section 102.67 of the Board’s Rules and Regulations.

A request for review may be E-Filed through the Agency’s website but may not be filed by facsimile. To E-File the request for review, go to www.nlrb.gov, select E-File Documents, enter the NLRB Case Number, and follow the detailed instructions. If not E-Filed, the request for review should be addressed to the Executive Secretary, National Labor Relations Board, 1015 Half Street SE, Washington, DC 20570-0001. A party filing a request for review must serve a copy of the request on the other parties and file a copy with the Regional Director. A certificate of service must be filed with the Board together with the request for review.

Neither the filing of a request for review nor the Board’s granting a request for review will stay the election in this matter unless specifically ordered by the Board.

Dated: February 12, 2020

PATRICIA K. NACHAND
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