

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 2**

**KOLMAR LABORATORIES, INC.**

**Employer**

**And**

**Case 02-RC-261497**

**INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 1430**

**Petitioner**

**DECISION AND DIRECTION OF ELECTION**

Kolmar Laboratories, Inc., (the Employer) is engaged in the innovation, formulation, and manufacturing of color cosmetics, skincare, and personal care products. International Brotherhood of Electrical Workers Local 1430 (the Petitioner) seeks to represent the following bargaining unit of employees employed at the Employer's 20 West King Street, Port Jervis, New York facility:

Included: All full-time and regular part-time Assembly Is, Assembly IIs, Assembly IIIs, Assembly IVs, Attendants - Di Water Separation, Attendant Is, Attendant IIs, Bulk Handlers, Chief Technicians, Cleaners, Cleaner IIs, Clerk - Maintenance, all employees working in the shipping and receiving department including Clerk Is and Clerks IIs, Compounder Is, Compounder IIs, Compounder IIIs, Coordinators, Electrician Is, Inspector Is, Inspector IIs, Inspector IIIs, Junior Technician - QA Documentation Control, Junior Technician - QC Microbiology, Junior Technician - R&D Laboratory, Leader - Electrician, Leader - Logistics Shift, Line Leader - Operations, Maker - Tool and Die, Master Technicians, Material Handler Is, Material Handler IIs, Material Handler IIIs, Mechanic Is, Mechanic IIs, Senior Auditor - QA, Senior Technician - QA Documentation Control, Senior Technician - QC Analytical, Senior Technician - QC Incoming Inspection, Senior Technician - QC Microbiology, Special Sanitizer Is, Special Sanitizer IIs, Specialist - Inventory Control, Technician, Technician - Engineering, Technician - QA Documentation Control, Technician - QA Specifications, Technician - QC Product Lab, Technician - QC Analytical, Technician - QC Incoming Inspection, Technician - QC Microbiology, Technician - Shade Matching, Trainee - Technician, Weigher Is, Weigher IIs, and Weigher IIIs.

Excluded: All other employees, including managers, confidential employees, office clerical employees, temporary workers, seasonal workers, and guards, and professional employees and supervisors as defined in the Act.

The parties stipulate, and I find, that this bargaining unit is appropriate.

The only matter in contention is whether to conduct a manual or mail ballot election.<sup>1</sup>

The Employer argues that the election should be conducted manually. In support of its position, the Employer asserts that manual elections are typically more reliable than mail ballot elections and give rise to greater voter turnout.

The Petitioner argues that, most importantly, a mail ballot election is safer for all involved during the current COVID-19 pandemic. The Petitioner also maintains that the precautions required to allow for a manual election during a pandemic (such as Employer monitoring of who is in the voting area at any given time) would result in a needlessly coercive voting environment.

As fully discussed below, I have directed a mail ballot election. This is the safest and most appropriate method of conducting a prompt election in view of the extraordinary circumstances presented by the pandemic.

### **Facts**

#### *COVID-19 in New York*

When the COVID-19 pandemic first reached the United States in early 2020, the unquestioned epicenter of the disease was New York State, and, more specifically, New York City. Sadly, over 32,000 New Yorkers have died of COVID-19 in the past four months; over 18,000 of those lost to the pandemic resided in New York City. COVID-19 infection rates are presently rising in other parts of the country. On July 5, the seven-day average for daily new cases in the United States reached a record high for the 27th straight day.

There is no vaccine to prevent COVID-19. The virus is thought to spread mainly from person-to-person when individuals are in close contact with one another and through respiratory droplets produced when an infected person coughs, sneezes or talks. Some studies have suggested that COVID-19 can be spread by people who are completely asymptomatic.

As a result of this virtually unprecedented public health crisis, federal, state, and local governments have placed restrictions on whether people may gather together and whether businesses may open. On January 30, 2020, the World Health Organization designated the novel coronavirus, COVID-19, outbreak as a Public Health Emergency of International Concern; on January 31, 2020, United States Health and Human Services Secretary Alex M. Azar II declared a

---

<sup>1</sup> The petition in this case was filed under Section 9(c) of the Act. The parties were provided opportunity to present evidence on the issues raised by the petition at a hearing held before Hearing Officer Zachary Herlands of the National Labor Relations Board (the Board). I have the authority to hear and decide this matter on behalf of the Board under Section 3(b) of the Act. I find that the hearing officer's rulings are free from prejudicial error and are affirmed; that the Employer is engaged in commerce within the meaning of the Act and it will effectuate the purposes of the Act to assert jurisdiction; that the Petitioner is a labor organization within the meaning of the Act; and that a question affecting commerce exists concerning the representation of certain employees of the Employer. The parties were given the opportunity to file briefs, but neither party did so.

public health emergency for the entire United States to aid the nation's healthcare community in responding to COVID-19. On March 7, 2020, Governor Andrew Cuomo issued Executive Order No. 202 Declaring a Disaster Emergency in the State of New York. Since that time, Governor Cuomo has issued multiple Orders Continuing Temporary Suspension and Modification of Laws Relating to the Disaster Emergency.

Governor Cuomo's June Executive Orders have extended previous suspensions and modifications of laws related to the pandemic, with partial exceptions made for regions that have met metrics required to begin reopening. These Executive Orders have also delayed tax deadlines; canceled elections; and issued travel advisories, as travelers from regions where the pandemic is at its height will necessarily visit New York, just as New Yorkers will necessarily visit heavily infected regions. Executive Order 202.42 allows for gatherings of up to 25 individuals if a region within New York has reached Phase 3 of reopening. Gatherings of more than 25 individuals remain prohibited. Schools remain closed indefinitely.

The New York State Department of Health has also issued guidance for manufacturing activities during the pandemic. This guidance was most recently updated on June 26. The guidance states that "Responsible Parties must limit in-person employee gatherings (e.g. line huddles, safety meetings) to the greatest extent possible and use other methods such as video or teleconferencing whenever possible." Responsible Parties are also directed to take measures to reduce interpersonal contact and congregation through methods such as: limiting in-person presence to only those staff who are necessary; adjusting workplace hours; reducing on-site workforce to accommodate social distancing guidelines; shifting design (e.g. A/B teams, staggered arrival/departure times); prioritizing tasks that allow for social distancing (e.g. machine drilling, forging) over those that do not (e.g. processing lines); and/or avoiding multiple crews and/or teams working in one area by staggering scheduled tasks and using signs to indicate occupied areas.

New York City is also subject to local restrictions. On March 16, 2020, Mayor Bill de Blasio issued Emergency Executive Order No. 100. In the interest of protecting public health in New York City, this Order cancels a special election; directs hospitals to cancel or postpone elective procedures; directs entertainment venues and establishments that offer food and drink for purchase to close; and directs all agency heads to take all appropriate and necessary steps to preserve public safety and the health of their employees. Although New York City has entered Phase 3 of its reopening, restaurants are still barred from offering on-site dining.

The Employer's facility is located in Port Jervis, New York, approximately 75 miles from New York City. New York's Mid-Hudson Region, which includes Port Jervis, has recently entered Phase 4 of its reopening. This allows for the resumption of higher education, low-risk indoor and outdoor arts and entertainment, media production, and professional sports with no fans. However, movie theaters, gyms, and malls are not yet permitted to reopen.

Orange County, which includes Port Jervis, has also issued a standing Public Health Alert requiring the isolation of individuals who have tested positive for COVID-19. Every doctor, hospital, or other medical provider or facility operating within Orange County is required to

conspicuously place a copy of the Standing Order in their place of business. Addendum B to the Standing Order further requires that:

Any resident of Orange County, whether that person is symptomatic or not, who has tested positive for COVID-19, or who is suspected of having COVID-19 shall (a) travel directly to, if not already located there remain isolated at his/her residence, or at such other location as directed by the OCDOH, for at least 10 days...

During the mandatory isolation period, a person suspected of having COVID-19 is prohibited from visiting enclosed public spaces and sharing a bedroom or bathroom with others.

On June 7, 2020, County Executive of the County of Orange Steven M. Neuhaus issued Executive Order No. 5 of 2020 Declaring a State of Emergency in Orange County in Relation to the 2019 Novel Coronavirus. The Order authorizes emergency purchases by local government agencies and prohibits visitation at nursing homes and similar facilities. Additionally, the Orange County Department of Health issued a Notification advising residents that when they leave the confines of their living spaces, they must wear a mask or cloth face covering.

The record contains a June 29 article from *The New York Times* in which Governor Cuomo explains that he may delay various aspects of “reopening” due to rising rates of COVID-19 in other parts of the country, stating “you already have issues of people clearly violating social distancing, and you now have an added factor of viral spread all across the nation, and a high likelihood that those people will come to New York City. It’s that combination of facts that’s precarious.”

The record also contains a June 30 report by CNN regarding Coronavirus task force member Dr. Anthony Fauci’s statements to the Senate Health, Education, Labor and Pensions Committee as reported by CNN. Dr. Fauci suggests that new cases of COVID-19 may rise to a level of 100,000 a day within the United States and expresses dismay over people congregating in crowds and not wearing masks as well as inadequate attention being paid to guidelines on reopening.

#### *NLRB Procedures*

On March 19, because of the extraordinary circumstances related to the pandemic, the National Labor Relations Board temporarily suspended all Board-conducted elections through April 3, 2020. The Board took this extraordinary action to ensure the safety of Agency employees and members of the public involved in elections. At the time, several of the NLRB’s regional offices had been closed and other locations were operating with limited staffing such that the Board did not believe it was possible to effectively conduct elections. On April 1, the NLRB announced that it would not extend the suspension of elections past April 3 and would “permit elections to resume in a safe and effective manner, which will be determined by the Regional Directors.” The Agency has indeed resumed conducting elections, but that vast majority of these elections have been conducted via mail ballot.

In response to the evolving realities of the pandemic, on July 6 the Office of the General Counsel issued Memorandum GC 20-10: Suggested Manual Election Protocols. The suggested protocols include: polling times sufficient to accommodate social distancing without unnecessarily elongating exposure among Board Agents and observers; the employer's certification in writing that polling area is consistently cleaned in conformity with CDC standards; a spacious polling area, sufficient to accommodate six-foot distancing; separate entrances and exits for voters; separate tables spaced six feet apart; sufficient disposable pencils without erasers for each voter to mark their ballot; glue sticks or tape to seal challenge ballot envelopes; plexiglass barriers of sufficient size to protect the observers and Board Agent; and provision of masks, hand sanitizer, gloves and disinfecting wipes.

The Employer's proposed method of conducting the election addresses many of these concerns. Notably, the Employer has proposed that the election take place in a room with multiple entry/exit points and enough space so that tables may be situated six feet apart. The Employer has also noted a willingness to provide individual writing implements and personal protective equipment, including plexiglass dividers. The Employer has explicitly stated its willingness to allow a Board agent to inspect the polling area 24 hours prior to the election.

Importantly, though, Memorandum GC 20-10 further requests an employer's written certification of how many individuals have been present in the facility within the preceding 14 days who have tested positive for COVID-19; who have been directed by a medical professional to proceed as if they have tested positive for COVID-19; who are awaiting results of a COVID-19 test; who are exhibiting symptoms of COVID-19; or who have had direct contact with anyone in the previous 14 days who has tested positive for COVID-19. The record makes it plain that the Employer does not track this information and therefore cannot provide an accurate certification.

Finally, Memorandum GC 20-10 notes that Regional Directors are encouraged to assign the election to Board agents who have volunteered to run the election. No Board agents have volunteered to run this election. There is not, as of yet, guidance from the General Counsel or an agreement with the Board agents' union to suggest how a manual election should be assigned to an unwilling Board agent during a pandemic.

The Employer argues that the exposure of Board agents and voters to COVID-19 is irrelevant because Board agents and voters are of working age and COVID-19 is more likely to result in death where the infected individual is over 75 years old. However, the record includes statistics of COVID-19 deaths in New York City broken down by age. While 8,869 confirmed deaths indeed occurred among those aged 75 and older, 9,131 deaths occurred among those aged 74 and younger. COVID-19 is a disease which disproportionately affects the elderly, but it is certainly not a disease which exclusively affects the elderly. Furthermore, a healthy, working-age individual can easily infect a more vulnerable family member, and it is understandable that many participants in an election would prefer not to expose themselves to COVID-19 more than necessary by visiting an in-person polling location when a safer alternative is at hand. Indeed, local and national guidance encourages those of all ages to lessen interpersonal contact wherever possible for this very reason. Additionally, local guidance requires potential voters in this election

to isolate themselves after exposure to COVID-19, thus potentially disenfranchising voters who find themselves quarantined on the chosen date of a manual election.

### Analysis

Congress has charged the Board with establishing the procedure and safeguards necessary to insure the fair and free choice of bargaining representatives. The Board, in turn, has delegated the discretion to determine the arrangements for an election to Regional Directors. *San Diego Gas and Electric*, 325 NLRB 1143, 1144 (1998); citing *Halliburton Services*, 265 NLRB 1154 (1982); *National Van Lines*, 120 NLRB 1343, 1346 (1958); *NLRB v. A.J. Tower Co.*, 329 U.S. 324, 330 (1946). This discretion includes the ability to direct a mail-ballot election where appropriate. *San Diego Gas & Elec.* at 1144-1145.

The Board's longstanding policy is that elections should generally be conducted manually. NLRB Casehandling Manual Part Two Representation Proceedings, Sec. 11301.2. However, a Regional Director may reasonably conclude, based on circumstances tending to make voting in a manual election difficult, to conduct an election by mail ballot. *Id.* This includes a few specific situations addressed by the Board, including where voters are "scattered" over a wide geographic area, "scattered" in time due to employee schedules, in strike situations, or other extraordinary circumstances. *San Diego Gas*, *supra* at 1145.

On May 8, 2020, in *Atlas Pacific Engineering Company*, 27-RC-258742 (May 8, 2020), the Board, in denying the employer's request for review, stated that the COVID-19 pandemic constitutes extraordinary circumstances warranting a mail ballot where federal, state, and local government directives have limited nonessential travel, required the closure of nonessential businesses, and resulted in a determination that the regional office charged with conducting the election should remain on mandatory telework.

Under ordinary circumstances, it is likely that all parties would agree to a manual election and that I would approve that agreement. However, the current pandemic does not present ordinary circumstances. It is uncontroverted that the pandemic has impacted the State of New York. Although requirements have been eased and a slow reopening has begun, guidelines at the federal, state and local level continue to recommend avoiding unnecessary travel or social contact, as well as conducting business remotely when possible. Governor Cuomo has made it plain that requirements may need to be made more stringent again due to the overwhelming rise of COVID-19 in other states.

Although certain safety measures, if obeyed by everyone and carried out to perfection, might limit some close interaction and mitigate some of the unnecessary risks associated with conducting a manual or mixed mail-manual election here, the Board's mail-ballot process all but eliminates the inherent safety risks and equally ensures that employees can conveniently and freely exercise their right to vote. The State of New York has requested that work be performed remotely where possible. It is unquestionably possible to perform a fair election which enfranchises all voters via mail ballot.

While the Board has expressed a general preference for manual balloting, it has never hesitated to ballot by mail when the circumstances warrant it. Indeed, the Board's preference for manual elections is not to be interpreted as a suggestion that mail balloting is somehow inferior or a less reliable or effective means of determining employees' representational desires. As the Board noted in *London's Farm Dairy, Inc.*, 323 NLRB 1057, 1058 (1997):

[W]hile we agree with our dissenting colleague that the Agency has a proud long tradition of conducting elections by manual balloting and that most elections have been and are conducted manually, it has an equally long history of conducting elections by mail. From the earliest days of the Act, the Board has permitted eligible voters in appropriate circumstances to cast their ballots by mail. See, for example, *Lykes Bros. S.S. Co.*, 2 NLRB 102, 108, 111 (1936); *United Press Assns.*, 3 NLRB 344, 352 (1937); *Pacific Greyhound Lines*, 4 NLRB 520, 539 (1937); *Pacific Lumber Inspection Bureau*, 7 NLRB 529, 534 (1938); *Salt River Valley Water Users Assn.*, 32 NLRB 460, 472 (1941); *Continental Bus Systems*, 104 NLRB 599, 601(1953); and *National Van Lines*, 120 NLRB 1343 (1958).

The Employer has argued that manual elections are typically more reliable than mail ballot elections and give rise to greater voter turnout, but has provided no evidence in support of this position. The majority opinion in *London's Farm Dairy, Inc.*, holds that balloting by mail is not in fact less effective and does not lend itself to subterfuge, coercion, invasion of privacy or other abuse. As the Board observed then, "Indeed, in the 62-year history of the Act, there has been only one reported instance of such abuse, see *Human Development Assn.*, 314 NLRB 821 (1994), and there is a similar record in the 71-year history of the Railway Labor Act (RLA), under which the use of mail ballots in representation elections has been the rule and not the exception." Also note that no manual election has been conducted by the National Mediation Board (NMB) under the RLA since 1987. In conclusion, the Board has a long and proud tradition of conducting manual and mailballot elections alike; manual elections are merely preferable when, unlike here, in-person balloting is feasible, safe, and practical to conduct.

The Employer may note that conditions in Orange County presently allow for some nonessential travel and the opening of some nonessential businesses, and that a manual election is therefore appropriate. This argument is not persuasive while conditions in New York City, where the regional office charged with conducting such an election is located, remain tenuous and may be altered at any time due to the overall trend of rising cases nationwide. At this time, it is not feasible, nor safe, nor appropriate to conduct a manual election.

Luckily, as discussed above, the Agency has an alternative method of conducting an election via mail ballot. A mail ballot election has no apparent significant drawbacks. A mail ballot election will minimize the risk of exposing employees, Board agents, Employer and Union representatives, their families, and the public to this virus and, thereby, maximize participation. Additionally, given the current rapidity of changes to both recommended and mandatory virus countermeasures, a manual ballot election would be fraught with uncertainty and subject to unpredictable changes. For example, should the Board agent directed to conduct a manual election arrive at the Employer's premises running a low fever, that Board agent would be denied admission and the election would be unexpectedly postponed. If a group of the Employer's employees were

exposed to COVID-19 several days before the election, they would be forced by local directive to forfeit their right to vote in order to quarantine themselves. A mail-ballot election provides the certainty of process and procedure to conduct an election within a prompt period and in an effective manner.

### **Conclusion**

The National Labor Relations Board will conduct a secret mail 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 Brotherhood of Electrical Workers Local 1430.

#### **A. Election Details**

The election will be conducted by United States mail. The mail ballots will be mailed to employees employed in the appropriate collective-bargaining unit. On July 22, 2020, ballots will be mailed to voters by National Labor Relations Board, Region 02. Voters must sign the outside of the envelope in which the ballot is returned. Any ballot received in an envelope that is not signed will be automatically void.

Voters must return their mail ballots so that they will be received in the National Labor Relations Board, Region 02 office by close of business on August 5, 2020.

Those employees who believe that they are eligible to vote and did not receive a ballot in the mail by July 29, 2020, should communicate immediately with the National Labor Relations Board by either calling the Region 02 Office at (212) 776-8633 or our national toll-free line at 1-844-762-NLRB (1-844-762-6572).

Due to the extraordinary circumstances of COVID-19 and the directions of state or local authorities including but not limited to Shelter in Place orders, travel restrictions, social distancing and limits on the size of gatherings of individuals, I further direct that the ballot count will take place virtually on a date to be determined by the undersigned Regional Director, during the period from Wednesday, August 19, 2020, through Wednesday, August 26, 2020, inclusive. The Region will provide notice to the parties of the scheduled date for the count at least 24 hours prior to the count. For the same reasons, the count will take place virtually on a platform (such as Skype, Zoom, WebEx, etc.) to be determined by the Regional Director. Each party will be allowed to have one observer attend the virtual ballot count.

If the dates the ballots are due to be deposited by Region in the mail, or the date set for their return, or the date, time, and place of the count for the mail ballot election are postponed or canceled, the Regional Director, in his or her discretion, may reschedule such dates, times, and places for the mail ballot election.

## **B. Voting Eligibility**

Eligible to vote are those in the unit who were employed during the payroll period ending immediately preceding the date of this Decision, 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(1) 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 July 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.nlr.gov/what-we-do/conduct-elections/representation-case-rules-effective-april-14-2015](http://www.nlr.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.nlr.gov](http://www.nlr.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**

Notices of Election will be electronically transmitted to the parties, if feasible, or by overnight mail if not feasible. Section 102.67(k) of the Board's Rules and Regulations requires the Employer to timely post copies of the Board's official Notice of Election in conspicuous places, including all places where notices to employees in the unit are customarily posted. You must also distribute the Notice of Election electronically to any employees in the unit with whom you customarily communicate electronically. In this case, the notices must be posted and distributed no later than 12:01 a.m. on July 17, 2020. If the Employer does not receive copies of the notice by July 15, 2020, it should notify the Regional Office immediately. Pursuant to Section 102.67(k), a failure to post or distribute the notice precludes an employer from filing objections based on nonposting of the election notice.

To make it administratively possible to have election notices and ballots in a language other than English, please notify the Board agent immediately if that is necessary for this election. Also, if special accommodations are required for any voters, potential voters, or election participants to vote or reach the voting area, please tell the Board agent as soon as possible.

Please be advised that in a mail ballot election, the election begins when the mail ballots are deposited by the Region in the mail.

#### **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.nlr.gov](http://www.nlr.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.

Kolmar Laboratories, Inc.  
Case 02-RC-261497

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: July 10, 2020



---

John J. Walsh, Jr.  
Regional Director  
National Labor Relations Board  
Region 02  
26 Federal Plz Ste 3614  
New York, NY 10278-3699