

November 12, 2007

NLRB Region 28  
2600 N. Central Avenue  
Suite 1800  
Phoenix, Arizona 85004-3099

Dear NLRB Resident Officer,

Please let this letter serve as official notice that IUOE Local 351 is filing objectionable conduct in regards to the election that was held on November 9, 2007 (Case 28-RC-6563). IUOE Local 351 filed the following ULP Charges (28-CA-21619), (28-CA-21614), (28-CA-21585).

1. Letter promising wage increases to some employees.
2. On or about Wednesday, November 7, 2007 the Company through its employees communications system (referred to as Line 288) the center Director told employees that she had polled no less than 70 no votes and encouraged people to join the no vote.
3. The center intimidated the eligible voters by disseminating its intent to have the HR Manager as the Co. Observer during the election.
4. The center made promises during the campaign to provider better health care and cell phone to all counselors.
5. Center's Director interfered with the organizing efforts by prosecuting the organizing committee in public thus attempting to set an example as to what would happen to employees if they openly campaigned for the Union.
6. Please also consider the charges previously charged against this employer.
7. The Company tried to influence voters by paying 2 hours of overtime to those people who were off the day of the election to come in and vote.

Based on the conduct described below the petitioner request the Regional Director to set aside the election and direct a second election.

If you need further assistance regarding this issue feel free to contact me at (915) 771-0224.

Sincerely,

Victor Aguirre  
Business Representative  
IUOE Local 351