

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original together with four copies and a copy for each additional charged party named in item 1 with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer WTMJ-TV, Journal Broadcast Group, Inc.		b. Number of workers employed 200 (approximately)	
c. Address (Street, city, state, and ZIP code) 720 East Capitol Drive Milwaukee, WI 53212		d. Employer Representative Steve Wexler, Vice President and General Manager	e. Telephone No. (414) 332-9611 Fax No. (414) 967-5255
f. Type of Establishment (factory, mine, wholesaler, etc.) Television Station		g. Identify principal product or service Television News and Program	
h. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) <u>5, and 8(d)</u> of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth clear and concise statement of the facts constituting the alleged unfair labor practices) See Attachment.			
3. Full name of the party filing charge (if labor organization, give full name, including local name and number) International Brotherhood of Electrical Workers, Local 715, AFL-CIO			
4a. Address (Street and number, city, state and ZIP code) 633 South Hawley Road, Suite 107 Milwaukee, Wisconsin 53214-1948		4b. Telephone No. (414) 479-0580 Fax No. (414) 479-0582	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) International Brotherhood of Electrical Workers, AFL-CIO-CLC			
6. DECLARATION			
I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.			
By <u>Mark A. Sweet</u> (signature of representative or person making charge)		Mark A. Sweet, Attorney (Print/type name and title or office, if any)	
Address <u>705 East Silver Spring Drive, Milwaukee, WI 53217</u>		(fax) <u>(414) 332-5430</u>	
		<u>(414) 332-2255</u> (Telephone No.)	
		<u>08-06-08</u> (date)	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

**Attachment to
Charge Against Employer
IBEW Local 715 and WTMJ-TV, Journal Broadcast Group, Inc.**

On July 31, 2008, the above-referenced Employer failed and refused to bargain collectively with the International Brotherhood of Electrical Workers, Local 715, AFL-CIO, by partially implementing its bargaining proposals, including the permissive proposals regarding the scope of the bargaining unit, by announcing a mandatory "production meeting" on August 1, 2008.

On or about July 31, 2008, the Employer failed and refused to bargain collectively with the International Brotherhood of Electrical Workers, Local 715, AFL-CIO, by partially implementing its bargaining proposals, including the permissive proposals regarding the scope of the bargaining unit, by assigning IBEW-represented Engineer Maya Held to perform IATSE-represented production specialist work, floor directing, on August 6, 2008.

On August 1, 2008, the above-referenced Employer failed and refused to bargain collectively with the International Brotherhood of Electrical Workers, Local 715, AFL-CIO, by partially implementing its bargaining proposals, including the permissive proposals regarding the scope of the bargaining unit, by requiring IBEW-represented Engineers to train IATSE-represented production specialists to perform Engineering jobs.

On August 1, 2008, the above-referenced Employer, by its Vice President of News, Bill Berra, and its Manager of News Production, Tony Lucas, unilaterally implemented its permissive proposals regarding the scope of the bargaining unit by instructing employees in both units of its expectation of cross-training of Engineers performing Production Specialists work and Production Specialists performing Engineering functions starting with the posted schedule of August 11.

On or about August 1, 2008, the above-referenced Employer bypassed the Union by providing employees represented by IBEW Local 715 and employees represented by IATSE Local 18 copies of employee evaluations that would judge employees based on their ability to perform work within the other Union's jurisdiction.

On or about August 1, 2008, the above-referenced Employer unilaterally changed the discipline policy, an item not raised previously in bargaining or in its unlawfully implemented final offer, by announcing that employees would be disciplined if not meeting newly set and unilaterally implemented standards.

On or about August 1, 2008, and continuing to date, the Employer engaged in the unlawful economic weaponry described above without giving the requisite notice to FMCS and the Union pursuant to Section 8(d) of the Act.

Request for 10(j) Injunctive Relief

Due to the severity of the above-referenced charge, the ongoing unlawful conduct of the Employer, and the chilling effect of such conduct on the bargaining unit, the Charging Party requests that the General Counsel seek Section 10(j) injunctive relief.