


UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original 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 Beaumont Health System (William Beaumont Hospital)	b. Tel. No. 248 898-5000
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 3601 W 13 Mile Rd Royal Oak, MI 48073	e. Employer Representative
	g. e-Mail
	h. Number of workers employed
i. Type of Establishment (factory, mine, wholesaler, etc.) Hospital	j. Identify principal product or service Health Care
k. 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) (3) _____ 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 unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See attachment.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Michigan Nurses Association	
4a. Address (Street and number, city, state, and ZIP code) 2310 Jolly Oak Rd Okemos, MI 48864	4b. Tel. No. 517 349-5640
	4c. Cell No.
	4d. Fax No.
	4e. e-Mail
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)	
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></u> (signature of representative or person making charge)	Amy Bachelder, Attorney (Print/type name and title or office, if any)
Tel. No. 313 496-9408	
Office, if any, Cell No.	
Fax No. 313 965-4602	
e-Mail abachelder@michlabor.legal	
Address Nickelhoff & Widick, 333 W Fort, Suite 1400, Detroit, MI 48226 <u>7/9/19</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

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Attachment

William Beaumont Hospital (Beaumont) has discriminated against its Registered Nurses because of their activities on behalf of the Michigan Nurses Association (MNA), and interfered with, restrained, and coerced its Registered Nurses in their activities on behalf of MNA by the following conduct:

In February 2019, Beaumont changed the job duties of Nurse Mary Beth Boeson because of her activities on behalf of MNA and other concerted activities protected by Section 7 of the Act, in a manner designed to isolate her contact with other Nurses.

In about May 2019 Beaumont discriminated against Nurses supporting MNA by denying them the opportunity to attend meetings with labor consultants while permitting other Nurses to attend such meetings and told them that if they are allowed to attend such meetings, it will be only with other Nurses supporting MNA.

On about April 19, 2019 Beaumont by its agent Anne Ronk, interrogated Nurses about their activities on behalf of MNA and other concerted activities protected by Section 7 of the Act.

In about March 2019 Beaumont ejected a MNA representative from a public area of its premises.

In about April 2019 Beaumont, by its agent Anne Ronk, created the impression of surveillance by telling employees that their postings on a private facebook page were not private and by interrogating employees about such postings.

In about late May and early June 2019 Beaumont, by its agents Kimberly Guseman and Deidre Maloney, created the impression of surveillance by requesting that they be admitted to a private facebook group page.

On various occasions in April and May 2019, Beaumont, by its agents Vicki Rayburn and Amena Beslic, threatened employees with loss of favorable working conditions if MNA was selected as their collective bargaining representative.

In about May 2019 Beaumont, by its agent Melissa Ashton, discriminatorily enforced its no solicitation no distribution policy by telling Nurses that they are not permitted to pass out MNA badge pulls.

In about June 2019 Beaumont permitted nurses opposed to MNA to solicit opposition to MNA from other nurses during working time.

In June 2019 Beaumont, by its agent Christina Boyland, announced a rule that prohibits Nurses from talking about unions.

In June 2019 Beaumont, by its agents Ann Ronk, Cathy Cushing, and Kathy Armstrong, interrogated

employees about their activities on behalf of MNA and discriminatorily prohibited Nurses from passing out MNA badge pulls.

Since January 2019 Beaumont has maintained policies which interfere with, restrain, and coerce employees in connection with their activities protected under Section 7 of the Act, specifically including but not limited to:

- Policy 275 Solicitation and Distribution on Hospital Property
- Policy 280 Dress Code, Grooming and Image Policy
- Policy 284 Employee Grievance Policy
- Policy 296 Communication Systems
- Policy 297 Social Networking and Other Web-Based Communications
- unnumbered Chain of Command

Additionally, Policy 297, Social Networking and Other Web-Based Communications, is in violation of an NLRB settlement agreement entered into by Beaumont and MNA, approved by the Regional Director of Region 7, NLRB, in October 2015, in Case 07-CA-151096.