

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
SETTLEMENT AGREEMENT

IN THE MATTER OF  
United States Postal Service

Cases 13-CA-293936  
13-CA-298823  
13-CA-300170  
13-CA-303775  
13-CA-306111  
13-CA-308074  
13-CA-309335  
13-CA-309974  
13-CA-311037  
13-CA-321161  
13-CA-321162

Subject to the approval of the Regional Director for the National Labor Relations Board, the Charged Party and the Charging Party **HEREBY AGREE TO SETTLE THE ABOVE MATTER AS FOLLOWS:**

**POSTING OF NOTICE** — After the Regional Director has approved this Agreement, the Regional Office will send copies of the approved Notice, including Appendix A, to the Charged Party in English and in additional languages if the Regional Director decides that it is appropriate to do so. A responsible official of the Charged Party will then sign and date those Notices and immediately post them at the Charged Party’s Cardiss Collins facility, Busse facility, Palatine facility, Carol Stream facility, and Bedford Park facility where Notices are customarily posted at all of the Charged Party’s postal facilities named-above within the USPS’ Chicago District where notices to employees are customarily posted. If the Charged Party’s place of business is currently closed and a substantial number of employees are not reporting to the facility due to the Coronavirus pandemic or is operating with less than a substantial complement of employees, the 60 consecutive day period for posting will begin when the Charged Party’s place of business reopens and a substantial complement of employees have returned to work. For purposes of this notice posting, a substantial complement of employees is at least 50% of the total number of employees employed by the Charged Party prior to closing its business due to the Coronavirus pandemic. The Charged Party will keep all Notices posted for 60 consecutive days after the initial posting.

**COMPLIANCE WITH NOTICE** — The Charged Party will comply with all the terms and provisions of said Notice.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR

**MANDATORY TRAINING** — Within 30 days of the approval of this Agreement, the Charged Party will schedule mandatory training, to take place during the workday and on paid work time, for all District Labor Relations Specialists for Illinois Districts 1 and 2; District Manager, Labor Relations for Illinois Districts 1 and 2; and managers and supervisors employed at the Charged Party’s Cardiss Collins facility, Busse facility, Palatine facility, Carol Stream facility, and Bedford Park facility.

The Employer is conducting seven training sessions via Zoom, Central Standard Time, during the 30-day window described above beginning October 19, 2023.

Each individual attending the training sessions will sign an acknowledgement form attesting to the fact that he or she has completed this training. A copy of these forms will also be provided to the Regional Director within 14 days from the day of the respective training sessions.

**INFORMATION REQUEST LOG** Within 14 days of the approval of this Agreement, the Charged Party will create, and if one already exists, update its information request tracking system at its Busse facility, Cardiss Collins facility, Palatine facility, Carol Stream facility, and Bedford Park facility by maintaining an information request log containing the following information: (a) a list of each request for information (RFI) submitted to the above facilities by or on behalf of the Union; (b) the name of the person making each RFI; (c) the name of the Charged Party’s representative who acknowledged receipt of each RFI; (d) the date of receipt of each RFI; (e) a general description of the information requested, or reference to a copy of the RFI attached to the log; (f) the date each RFI was responded to; and (g) a summary of the Charged Party’s response to each RFI, including who the response was provided to and what information was provided or refused and why. At least once, on a quarterly basis on a schedule that is mutually agreeable to the parties, the Charged Party will submit the information request log to the Union for review; and notify Union stewards when the manager or supervisor who is designated to receive union requests for information at the above facilities has changed.

**SCOPE OF THE AGREEMENT** — This Agreement settles only the allegations in the above-captioned case(s), including all allegations covered by the attached Notice, including Appendix A to Employees made part of this agreement, and does not settle any other case(s) or matters, and it is limited to the facilities identified in the Posting of Notice section above. It does not prevent persons from filing charges, the General Counsel from prosecuting complaints, or the Board and the courts from finding violations with respect to matters that happened before this Agreement was approved regardless of whether General Counsel knew of those matters or could have easily found them out. The General Counsel reserves the right to use the evidence obtained in the investigation and prosecution of the above-captioned case(s) for any relevant purpose in the litigation of this or any other case(s), and a judge, the Board and the courts may make findings of fact and/or conclusions of law with respect to said evidence.

**PARTIES TO THE AGREEMENT** — If the Charging Party fails or refuses to become a party to this Agreement and the Regional Director determines that it will promote the policies of the National Labor Relations Act, the Regional Director may approve the settlement agreement and decline to issue or reissue a Complaint in this matter. If that occurs, this Agreement shall be between the Charged Party and the undersigned Regional Director. In that case, a Charging Party may request review of the decision to approve the Agreement. If the General Counsel does not sustain the Regional Director’s approval, this Agreement shall be null and void.

**AUTHORIZATION TO PROVIDE COMPLIANCE INFORMATION AND NOTICES DIRECTLY TO CHARGED PARTY** — Counsel for the Charged Party authorizes the Regional Office to forward the cover letter describing the general expectations and instructions to achieve compliance, a conformed settlement, original notices

Charging Party (James Stevenson) Initials:	<u>JS</u>
Charging Party (Bhupendra Patel) Initials:	<u>BP</u>
Charging Party (Benjamin Johnson) Initials:	<u>BJ</u>
Charged Party (United States Postal Service) Initials:	<u>AR</u>

and a certification of posting directly to the Charged Party. If such authorization is granted, Counsel will be simultaneously served with a courtesy copy of these documents.

Yes \_\_\_\_\_ No AR  
 Initials Initials

**PERFORMANCE** — Performance by the Charged Party with the terms and provisions of this Agreement shall commence immediately after the Agreement is approved by the Regional Director, or if the Charging Party does not enter into this Agreement, performance shall commence immediately upon receipt by the Charged Party of notice that no review has been requested or that the General Counsel has sustained the Regional Director.

The Charged Party agrees that in case of non-compliance with any of the terms of this Settlement Agreement by the Charged Party, and after 14 days’ notice from the Regional Director of the National Labor Relations Board of such non-compliance without remedy by the Charged Party, the Regional Director will reissue the consolidated complaint previously issued on November 30, 2022, in Cases 13-CA-293936, 13-CA-298823, 13-CA-300170, and 13-CA-303775.

Additionally, the Regional Director will issue a Complaint that includes the allegations in Cases 13-CA-306111, 13-CA-308074, 13-CA-321161, 13-CA-321162, 13-CA-309335, 13-CA-209974, and 13-CA-311037 which are covered by the Notice to Employees, as identified above in the Scope of Agreement section, as well as filing and service of the charge(s), commerce facts necessary to establish Board jurisdiction, labor organization status, appropriate bargaining unit (if applicable).

Thereafter, the General Counsel may file a motion for default judgment with the Board on the allegations of the complaint. The Charged Party understands and agrees that the allegations of the aforementioned complaint will be deemed admitted and its Answer to such complaint will be considered withdrawn. The only issue that may be raised before the Board is whether the Charged Party defaulted on the terms of this Settlement Agreement. The General Counsel may seek, and the Board may impose, a full remedy for each unfair labor practice identified in the Notice to Employees, including but not limited to Appendix A. The Board may then, without necessity of trial or any other proceeding, find all allegations of the complaint to be true and make findings of fact and conclusions of law consistent with those allegations adverse to the Charged Party on all issues raised by the pleadings. The Charged Party agrees that the Board may then issue an order providing, as elected by the Regional Director, a full remedy for the violations found as is appropriate to remedy such violations, and/or an order requiring the Charged Party to perform terms of this settlement agreement as specified by the Regional Director. The parties further agree that a U.S. Court of Appeals Judgment may be entered enforcing the Board order ex parte, after service or attempted service upon Charged Party/Respondent at the last address provided to the General Counsel, including its designated e-service inbox at [uspsnlrb@usps.gov](mailto:uspsnlrb@usps.gov).

**NOTIFICATION OF COMPLIANCE** — Each party to this Agreement will notify the Regional Director in writing what steps the Charged Party has taken to comply with the Agreement. This notification shall be given within 30 days, and again after 60 days, from the date of the approval of this Agreement. If the Charging Party does not enter into this Agreement, initial notice shall be given within 5 days after notification from the Regional Director that the Charging Party did not request review or that the General Counsel sustained the Regional Director’s approval of this agreement. No further action shall be taken in the above captioned case(s) provided that the Charged Party complies with the terms and conditions of this Settlement Agreement and Notice.

Charging Party (James Stevenson) Initials: JS  
 Charging Party (Bhupendra Patel) Initials: BP  
 Charging Party (Benjamin Johnson) Initials: BJ  
 Charged Party (United States Postal Service) Initials: AR

<b>Charged Party</b> <b>United States Postal Service</b>	<b>Charging Party</b> <b>American Postal Workers Union</b>
<i>/s/ Arthur Roxas</i> <i>10/18/2023</i>	<i>/s/ James Stevenson</i> <i>10/18/2023</i>
By:            Name and Title            Date	By:            Name and Title            Date
Print Name and Title below Arthur Roxas, NLRB Specialist	Print Name and Title below James Stevenson, National Business Agent
	By:            Name and Title            Date <i>/s/ Bhupendra Patel</i> <i>10/24/2023</i>
	Print Name and Title below Bhupendra Patel, Union Steward
	By:            Name and Title            Date <i>/s/ Benjamin Johnson</i> <i>10/18/2023</i>
	Print Name and Title below Benjamin Johnson, Director of Maintenance Craft
	<b>Charging Party</b> <b>American Postal Workers Union</b>
Recommended By:                      Date  <i>/s/ C. Hill</i> <i>10/20/2023</i> Christina Hill Field Attorney	Approved By:                                      Date  <i>/s/ Angie Cowan Hamada</i> <i>10/24/2023</i> Angie Cowan Hamada Regional Director, Region 13

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR

**(To be printed and posted on official Board notice form)**

**THE NATIONAL LABOR RELATIONS ACT GIVES YOU THE RIGHT TO:**

- Form, join, or assist a union;
- Choose a representative to bargain with us on your behalf;
- Act together with other employees for your benefit and protection;
- Choose not to engage in any of these protected activities.

**WE WILL NOT** interfere with, restrain, or coerce you in the exercise of the above rights.

**WE WILL NOT** in any like or related manner interfere with your rights under Section 7 of the Act, and **WE WILL** post at our facility an Employee Rights Notice that identifies your rights under the Act.

**WE WILL NOT** fail or delay in providing American Postal Workers Union (Union) with information that is relevant and necessary to its role as your bargaining representative.

**WE WILL** provide the Union with the information as described in the attached Appendix A.

**United States Postal Service**

(Employer)

**Dated:** \_\_\_\_\_ **By:** \_\_\_\_\_  
(Representative) (Title)

---

*The National Labor Relations Board is an independent Federal agency created in 1935 to enforce the National Labor Relations Act. We conduct secret-ballot elections to determine whether employees want union representation and we investigate and remedy unfair labor practices by employers and unions. To find out more about your rights under the Act and how to file a charge or election petition, you may speak confidentially to any agent with the Board's Regional Office set forth below or you may call the Board's toll-free number 1-844-762-NLRB (1-844-762-6572). Callers who are deaf or hard of hearing who wish to speak to an NLRB representative should send an email to [relay.service@nlrb.gov](mailto:relay.service@nlrb.gov). An NLRB representative will email the requestor with instructions on how to schedule a relay service call.*

Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

**Telephone:** (312)353-7570  
**Hours of Operation:** 8:30 a.m. to 5 p.m.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR

**THIS IS AN OFFICIAL NOTICE AND MUST NOT BE DEFACED BY ANYONE**

This notice must remain posted for 60 consecutive days from the date of posting and must not be altered, defaced or covered by any other material. Any questions concerning this notice or compliance with its provisions may be directed to the above Regional Office's Compliance Officer.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR

**APPENDIX A**

**WE WILL** agree to waive timeliness arguments in those instances where grievances were not timely pursued because of the Employer’s failure to timely provide information, up to 30 days after the information has been produced.

**Case 13-CA-293936**

**WE HAVE**, in Case 13-CA-293936 which involves conduct at our postal facilities located at 433 W. Harrison Street, Chicago, Illinois (Cardiss Collins facility); 2591 Busse Road, Elk Grove Village, Illinois (Busse facility); 1300 E. Northwest Highway, Palatine, Illinois (Palatine facility); and 550 E. Fullerton Avenue, Carol Stream, Illinois (Carol Stream facility) provided the Union with the following information that it requested on November 12, 2021: (A) any and all [PS Forms] 8038s and 8039s submitted to Eagan for employees Shantrice Dockery and Asia Slater; (B) a copy of any and all emails to or from Eagan regarding the back pay of these employees; and (C) a copy of any and all communications-documents to or from these employees regarding their back pay.

**WE WILL** also provide the Union with the following information that it requested on February 18, 2022: Any and all information regarding actions taken by management to investigate sexual harassment complaint against a supervisor forwarded to the Plant Manager on 11-3-2021, and at least two subsequent complaints against the same supervisor. **WE WILL** also provide the Union with the following information that it requested on April 4, 2022: a copy of the IMIP so the Union could process a class action grievance concerning the above supervisor’s alleged sexual harassment of employees.

**Case 13-CA-298823**

**WE HAVE**, in Case 13-CA-298823 which involves conduct at our Busse facility, provided the Union with the following information that it requested on May 20, 2022: (1) Copy of PS 1723 for Yasmeen Gowhler and clock rings from 02/01/2022 to present; (2) Copy of PS Form 50 for Tasneem Zaki in last three (3) months; and (3) Copy of everything clock rings for Tasneem Zaki from 02/01/22 to present. **WE WILL** also provide the Union with the following information that it requested on June 2, 2022: Copy of PS 1723 for Augustine Ulahannan detailed as Data Technician from April 1, 2022 to the present.

**Case 13-CA-300170**

**WE HAVE**, in Case 13-CA-300170 which involves conduct at our Busse facility, provided the Union with the following information that it requested on June 21, 2022: TACS User log report for Lead Clerk William Thompson for PP 13, 2022. **WE WILL** also provide the Union with the following information that it requested on July 5, 2022: TACS User log report for Lead Clerk William Thompson for PP 14, 2022. **WE WILL** also provide the Union with the following information that it requested on July 11, 2022: TACS User log report for Lead Clerk William Thompson for PP 15, WK 1, 2022.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR

**Case 13-CA-303775**

**WE WILL**, in Case 13-CA-303775 which involves conduct at our postal facility located at 6801 W. 73rd Street, Bedford Park, Illinois (Bedford Park facility), provide the Union with the following information that it requested on June 29, 2022: the higher-level report [including Authorized Higher-Level Reports, Automatic Higher-Level Reports, and Higher Level Details Reports] for all employees employed at the South Suburban facility from September 13, 2018 to present.

**Case 13-CA-306111**

In Case 13-CA-306111, which involves conduct at various postal facilities located in the Chicagoland area:

**WE HAVE** provided the Union with the following information it requested on February 15, 2022 and again on May 2, 2022:

1. Copies of all Work Orders for Letter Box Mechanics from 10/01/2020-09/30/2021.
2. Copies of all Assignment Sheets for Letter Box Mechanics from 10/01/2020 to 09/30/2021.
3. Total number of hours from 10/02/2020-09/30/2021 for the following employees:
  - a. Eddie Spearman
  - b. Loyd Gordon
  - c. Tommie Westbrook
  - d. Charlene Clark
  - e. Devie Windom
  - f. Michael Johnson
4. EER Tacs rings fro the above employees from 10/01/2020 to 09/30/2021

**WE WILL** provide the Union with the following information it requested on March 26, 2022 and again on May 2, 2022:

1. Detailed Copy of housekeeping inspection reports PS-4851 for previous 12 months for Cardis Collins and the Vmf facilities. These reports should include, among other things, the names and signatures of all personnel who performed inspection along with recommendations to all deficiencies.
2. Copies of all invitations to Unions to participate in the housekeeping inspections.

**WE WILL** provide the Union with the following information it requested on March 28, 2022 and again on April 7, 2022 and on May 2, 2022:

1. A copy of the contracts for Custodial cleaning performed throughout the Cardis Collins Installation for the previous 12 months (03-27-21 to 03-27-2022) by Contract Custodians. This includes Cardis Collins along with all of its stations, branches, offices, and facilities.
2. A list of all vacant Custodial duty assignments in the Chicago Cardis Collins Installation.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR



**WE HAVE provided** the Union with the following numbered information it requested on March 28, 2022 and again on April 7, 2022 and on May 2, 2022:

3. The names and current bids for all Custodians in the Chicago Cardis Collins Installation.
4. The most recent copy of all Custodians' PAR Selection forms.

**WE WILL** provide the Union with the following information it requested on April 20, 2022 and again on May 2, 2022:

1. Record of initial and recurring training all custodians.
2. A copy of semi-annual 4851 Building Housekeeping records for the previous 12 months.

**WE WILL** provide the Union with the following information it requested on May 2, 2022:

1. Copy of Tour 2 Custodians' 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> choices for Prime Vacation requests for 2022.
2. Copy of all 3971s submitted by Tour 2 Custodians for Prime Vacation requests.
3. Copy of 2022 Vacation Schedule for Tour 2 Custodians.

**WE WILL** provide the Union with the following information it requested on May 16, 2022 and again on May 21, 2022:

1. A Copy of EER Tacs reports for all Cardis Collins Custodians from May 1, 2022 to May 16, 2022.
2. A Copy of all 3971's from Custodians waving overtime for the above time period.
3. A Copy of Tour 1, 2 and 3 schedules for Custodians for the above time period.
4. A copy of the current Custodian workload summary.

**WE HAVE** provided the Union with the following information it requested on June 21, 2022 and again on August 27, 2022:

Work Order Reports for Register 251, Crew 016 from May 1, 2022 to present. Report should include both open and closed work orders for that period.

**WE HAVE** provided the Union with the following information it requested for MOS clerks on June 22, 2022 and again on August 27, 2022:

1. Holiday Canvass Sheet for Memorial Day, Juneteenth and 4<sup>th</sup> of July Holidays.
2. Holiday Schedule for Memorial Day, Juneteenth and 4<sup>th</sup> of July Holidays.
3. EER's report for MOS clerks form May 1, 2022 to June 22, 2022.
4. Overtime desired list.
5. Canvas Sheet for ODL MOS Clerks.

**WE WILL** provide the Union with the following information it requested on July 11, 2022:

1. A copy of all submitted doctor's statements given to Supervisor Forte from/to custodian Mujaani Insanum from July 2021 through July 2022.

2. A copy of all Mujaani Insanuns 3971s from July 21, 2021 to July 2022.
3. Copy of Mujaani Insanuns 2021-2022 3972.

**WE WILL** provide the Union with the following information it requested on July 25, 2025 and again on August 27, 2022, for each of Chicago's Stations and Branches excluding Cardiss Collins for July 9, 2022 to July 22, 2022:

1. Employee listing report.

**WE WILL** provide the Union with the following information it requested on July 29, 2022 and again on August 8, 2022:

1. Tacs EER for Et 10 Rice Teitsworth for 07/14/2022 to 07/29/2022.

**WE WILL** provide the Union with the following information it requested on August 15, 2022 and again on August 22, 2022:

1. The Ctc and training records of the above employees.
2. A copy of the letters mailed or emailed to the new employees welcoming them to the Postal Service and the positions or tours offered.

**WE HAVE** provided the Union with the following information it requested on August 22, 2022 relating to employee Leonard Wheeler:

1. PDI notes
2. FMLA documentation if applicable.

**WE WILL** provide the Union with the following information it requested on October 3, 2022 and again on October 25, 2022:

Copy of emails between Mary Bell and LaWanda Fox regarding Cardiss Collins Custodian Herbert Crocket from September 1, 2022 to September 30, 2022.

**WE WILL** provide the Union with the following information it requested on October 3, 2022 and again on October 21, 2022:

1. Copy of Overtime Desired list for Letterbox and Amt for April 1, 2022 to September 30, 2022.

**WE WILL** provide the Union with the following information it requested on October 4, 2022 and again on October 21, 2022: Tacs everything report (EER) for Mos Clerks from July 23, 2022 to October 3, 2022.

**WE WILL** provide the Union with the following information it requested on October 4, 2022 and again on October 21, 2022 and October 25, 2022, for each of Chicago's stations and branches excluding Cardiss Collins for Fiscal year 2022 (09/25/2021-09/30/2022): Records of Custodial training.

**WE WILL** provide the Union with the following information it requested on October 5, 2022 and again on October 21, 2022 for the Chicago Cardiss Collins 2022 Fiscal Year:

1. A list of vendors that collect and/or refurbish damaged Letter Boxes from the Chicago Installation.
2. A copy of all Contract(s) with vendors to purchase refurbished Letter Boxes.
3. Copy of all invoices for purchase(s) of Letter Boxes for the 2022 Fiscal Year.
4. And all documents and resources relied upon in the USPS effort in their performance to give due consideration per Article 32.1.A and 32.2.A to include all 5 factors.

**WE WILL** provide the Union with the following information it requested on October 12, 2022 and again on October 21, 2022, regarding Call/Problem: 28086321/3373221 Harwood Heights:

1. Copy of the call problem worksheet # 28086321/3373221 Harwood Heights.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2812562/3380105 Roseland Station:

1. Copy of the call problem worksheet # 2812562/3380105 Roseland Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2813242/3380724 Dunning Station:

1. Copy of the call problem worksheet # 2813242/3380724 Dunning Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2808672/3375792 Hyde Park Station:

1. Copy of the call problem worksheet # 2808672/3375792 Hyde Park Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2807376/3374356 Garfield Park Station

1. Copy of the call problem worksheet # 2807376/3374356 Garfield Park Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2814797/3382334 Chicago Midwest Station.

1. Copy of the call problem worksheet # 2814797/3382334 Chicago Midwest Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2806167/3373066 Morgan Park Station.

1. Copy of the call problem worksheet # 2806167/3373066 Morgan Park Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2815692/3383330 Chicago Stockyards Station.

1. Copy of the call problem worksheet # 2815693/3383330 Chicago Stockyards Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2814213/3381659 Chicago Main VMF

1. Copy of the call problem worksheet # 2814213/3381659 Chicago Main VMF.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2815219/3382826 Wicker Park Retail

1. Copy of the call problem worksheet # 2815219/3382826 Wicker Park Retail.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2814791/3382329 Englewood Station

1. Copy of the call problem worksheet # 2814791/3382339.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2814794/3382332 Englewood Station.

1. Copy of the call problem worksheet # 2814794/3382332 Englewood Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2814792/33822330 Englewood Station.

1. Copy of the call problem worksheet # 2814792/33822330 Englewood Station.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE WILL** provide the Union with the following information it requested on October 12, 2022, and again on October 21, 2022, regarding Call/Problem: 2809722/3376932 Chicago Cicero Branch.

1. Copy of the call problem worksheet # 2809722/3376932 Chicago Cicero Branch.
2. Copy of the contract work being performed.
3. Copy of the scope of the work being performed.
4. Copy of any and all cost comparison/analysis.
5. All information, documentation, records, data, correspondence, emails, etc. that was considered in the decision process to contract out the work.
6. A copy of the man-hours and labor costs.
7. A list of specialized tools, equipment and machinery needed to perform the work.

**WE HAVE** provided the Union with the following information it requested on October 5, 2022 and again on October 26, 2022:

1. The Overtime Desired List for Letter Box Mechanic/AMT for the second and third quarters of the 2022 calendar year (April 01, 2022 – September 30, 2022).
2. Tacs EER report for Charlene Clark (April 1, 2022 – September 30, 2022).

**WE WILL** provide the Union with the following information it requested on October 4, 2022 and again on October 5, 2022 and October 21, 2022:

A copy for viewing from each Maintenance Manager and supervisor, who is designated to receive Union requests for information at the Cardis Collins, Chicago, Illinois facility, a

signed acknowledgement from attesting to the fact that they have received and completed training that encompasses how to tender the relevant information that the Union requests.

**WE HAVE**, in Case 13-CA-30611, provided the Union with the following information which it requested on the dates listed below:

- Requested on April 20, 2022 and again on May 2, 2022:
  1. Total custodial (LDC) 38 hours worked for the 2020 fiscal year.
  2. A copy of Tacs EERs reports for LDC 38 Custodial employees for 2022 fiscal year to date.
- Requested on April 20, 2022 and again on May 26, 2022:
  1. A list of all vacant Custodial positions in the Chicago Installation.
  2. A list of all vacant MM7 positions at Cardis Collins.
  3. A list of all vacant MOS positions at Cardis Collins.
  4. A list of all vacant Mpe-9 positions at Cardis Collins.
  5. A list of all vacant Bem positions at Cardis Collins.
  6. A list of all vacant ET-10 positions at Cardis Collins.
  7. Seniority list for all Maintenance Craft Occupations.
  8. PER and PAR for all Maintenance Craft Employees.
- Requested on May 21, 2022: A copy of all 1723 for Cardis Collins Maintenance Craft from January 1, 2021 to May 21, 2021.
  
- Requested on July 25, 2025 and again on August 27, 2022, for each of Chicago's Stations and Branches excluding Cardiss Collins for July 9, 2022 to July 22, 2022:
  1. TACS/EER for all 16-6 employees (LDC38 Custodians).
  2. LTATs Weekly Summary Reports.
- Requested on July 29, 2022 and again on August 8, 2022: EER tacs reports for all ET10s, Mpe-9s and MM7s.
- Requested on August 15, 2022 and again on August 22, 2022:
  1. The names of the new custodians hired since January 2022.
  2. The current duty assignments of the above employees.
  3. The current, up to date seniority list of the Custodians in Chicago's Cardiss Collins and its outside stations and facilities.
- Requested on August 22, 2022 relating to employee Leonard Wheeler:
  1. Copies of all live prior discipline.
  2. Ps Form 3972 Absence Analysis for previous 2 years.
  3. Ps Form 3971 for all cited absences.
  4. Medical documentation submitted for any cited absences.
  5. Settlement, agreements or any arbitration awards.
  6. Tacs everything report for time period cited in issuance of above discipline.
  7. Documentation of attendance reviews/discussions.
  8. ERMS Employee Key Indicator report for current and previous year.

- Requested on October 3, 2022 and again on October 21, 2022:
  1. Copy of Completed Assignment Sheets for Cardiss Collins Custodians from October 17, 2021 to October 21, 2021.
  2. Assignment sheets signed.
- Requested on October 4, 2022 and again on October 21, 2022 and October 25, 2022, for each of Chicago’s stations and branches excluding Cardiss Collins for Fiscal year 2022 (09/25/2021-09/30/2022):
  1. PS-4852, PS-4869, PS-4839, PS-4776.
  2. PS-4851 Housekeeping Inspection.
  3. Maintenance Report LDC work hours report.
  4. TACS/EER for D/A 16-6 for Ldc-38 Custodians.
  5. Hours Analysis Report.
  6. Higher Level Detail Report.
  7. Employee Listing Report LTATs Weekly Summary Report.

**Case 13-CA-308074**

**WE HAVE** , in Case 13-CA-308074 which involves conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the information that remains outstanding from its September 8, 2022 request:

1. A copy of ALL PS Form 50 and PS Form 61 for attached PSE seniority list (PSE between 81 to 215) dated 4/8/2022 (Appendix A); and,
2. A copy of ALL PS Form 50 and PS Form 61 for PSEs (PSE between 38 and 54) (Appendix C).

**WE HAVE**, in Case 13-CA-308074 which involves conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on September 8, 2022:

1. A copy of Everything clock rings for all PSEs on roll from PP19, 2022 until date of information provided; and,
2. A copy of all letters issued to PSEs who were let go in May 2022 for lack of work.

**WE HAVE**, in Cases 13-CA-308074 which involves conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on September 9, 2022: “documents to prove that management contacted senior PSEs, who let go for lack of work in May 2022 to be rehired in August 2022 and declined. (Refer – Appendix A – PSEs from seniority #81 to 215)”.



**Case 13-CA-309335**

**WE WILL**, in Case 13-CA-309335, which involves conduct at our postal facility located at 6801 W. 73<sup>rd</sup> St. Bedford Park IL 60499, provide the Union with the following information it requested on December 5, 2022:

1. The 991s, 1796-Bs, for applicant Laura Amos and other applicants for 73294402, and the same for Jose Madrigal Jr. and other applicants for 954733336. **WE HAVE** provided all other information relating to this numbered request.
2. The vacancy notice/award notice and applicants for job number 73299402 and 954733336, including but not limited to Stephanie Brown, Laura Amos, Jose Madrigal Jr., or the second unidentified PSE who applied for the Data Collection job with Carleda Taylor. **WE HAVE** provided all other information relating to this numbered request.
3. –
4. –
5. The 1723 for any and all PSEs detailed to Best Qualified jobs 1/01 /20 to present.
6. The form 50 of Felecia Carr. **WE HAVE** provided all other information relating to this numbered request.
7. –

**WE WILL**, in Case 13-CA-309335, which involves conduct at our postal facility located at is 6801 W. 73<sup>rd</sup> St. Bedford Park IL 60499, provide the Union with the following information it requested on December 6, 2022: “provide the same information [requested on December 5, 2022] for the Claims and Inquiry Clerk Position (Best Qualified) [#72723047] posted at South Suburban for PSEs 7/18/22 to 7/28/22.”

**WE WILL**, in Case 13-CA-309335, which involves conduct at our postal facility located at is 6801 W. 73<sup>rd</sup> St. Bedford Park IL 60499, provide the Union with the following information it requested on December 20, 2022:

1. Please provide the names of any and all employees on this so-called "scanning and priority team."
2. Please provide any and all emails, documents, memos, meeting minutes, correspondence, and authorizations for this "scanning and priority team."
3. Please provide any national or headquarters documents authorizing a "scanning and priority team."
4. Please provide the official notification, dates and times that the employer informed Local President Lori Burns of this new "scanning and priority team."
5. Please provide the solicitation to the bargaining unit to participate on this "scanning and priority team."
6. Please provide the date that this "scanning and priority team" was created.

**WE WILL**, in Case 13-CA-309335, which involves conduct at our postal facility located at is 6801 W. 73<sup>rd</sup> St. Bedford Park IL 60499, provide the Union with the following information it requested on December 22, 2022:

1. Any and all Best Qualified jobs that went on reassign for South Suburban from 01 /01 /20 to present.
2. Any and all documents, correspondence, postings, results, applications, award notices for any and all Best Qualified job 01/01/20 to present that went on e-reassign.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR

3. Any and all communications, emails, pre-award notices, abbreviated award notices, between local services and shared services regarding any and all best qualified jobs at South Suburban. 01 /01 /20 to present.
4. Any and all emails between local services and shared services awarding any PSE a best qualified job including but not limited to Carleda Taylor.
5. Any and all requests, documents, emails, converting PSE Carleda Taylor into a career employee.

**Cases 13-CA-3099974 and 13-CA-311037**

**WE HAVE**, in Cases 13-CA-9974 and 13-CA-311037 which involves conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on November 28, 2022:

1. Copy of ALL PS Form 50 and PS Form 61 for Willesha Moore.
2. Copy of ALL PS Form 50 and PS Form 61 for all PSEs (PSE between 38 to 54) (Appendix # 2).
3. Copy of Letter issued to PSE Willesha Moore, who were let go.
4. Copy of any email or all correspondence (USPS mail) with Willesha Moore, who declined any offer to reappointment opportunity within 12 months from let go for lack of work from May 2022.
5. Copy of any discipline or termination letter issued to Willesha Moore when she was hired with seniority date of 02/12/22.
6. Copy of appointment letter issued to Willesha Moore in 2022.

**Cases 13-CA-321161 and 13-CA-321162**

**WE HAVE** , in Cases 13-CA-321161 and 13-CA-321162, which involve conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on April 23, 2023: Tacs Access Report for all maintenance supervisors (Willie Phillips, Antonio, Keith Williams, Rogers Bharel, Alysia Hope, Lisa Harris and Belinda Peterson) during pay period 9, 2023.

**WE HAVE** , in Cases 13-CA-321161 and 13-CA-321162, which involve conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on May 11, 2023: Tacs Access Report for all maintenance supervisors (Willie Phillips, Antonio, Keith Williams, Roers Bharel, Alysia Hope, Lisa Harris and Belinda Peterson) during pay periods 10 and 11, 2023.

**WE HAVE** , in Cases 13-CA-321161 and 13-CA-321162, which involve conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on June 1, 2023: Tacs Access Report for all maintenance supervisors (Willie Phillips, Antonio, Keith Williams, Roers Bharel, Alysia Hope, Lisa Harris and Belinda Peterson) during pay period 12, 2023.

**WE HAVE**, in Cases 13-CA-321161 and 13-CA-321162, which involve conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the

Union with the following information it requested on June 30, 2023: Tacs Access Report for all maintenance supervisors (Willie Phillips, Antonio, Keith Williams, Roers Bharel, Alysia Hope, Lisa Harris and Belinda Peterson) during pay period 13, 2023.

**WE HAVE**, in Cases 13-CA-321161 and 13-CA-321162, which involve conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information it requested on January 12, 2023 and again on February 3, 2023:

1. Copy of report that was register in “Workplace Environment Tracking System (WETS)” in last 6 months at Chicago Metro Surface Hub (Busse).
2. Training record for any management personnel responsible for recording harassment date into the Workplace Environment Tracking System.
3. Training record for any management personnel responsible for doing initial management inquiry process at Busse.
4. Finding and any action plan that management implement to handle harassment, including sexual, physical and abusive in last six months.

**WE HAVE**, in Cases 13-CA-321161 and 13-CA-321162, which involve conduct at our postal facility located at 2591 Busse Road, Elk Grove Village, Illinois (Busse facility), provided the Union with the following information which it requested on the dates listed below:

- Requested on April 23, 2023: Everything clock rings for all Maintenance Employees form all Tours for Pay Period 9, 2023
- Requested on May 11, 2023: Everything clock rings for all Maintenance Employees form all Tours for Pay Periods 10 and 11, 2023.
- Requested on June 1, 2023: Everything clock rings for all Maintenance Employees form all Tours for Pay 12, 2023.
- Requested on June 30, 2023: Everything clock rings for all Maintenance Employees form all Tours for Pay Period 13, 2023.

**WE WILL** provide each manager and supervisor, who is designated to receive union requests for information at our Cardiss Collins facility, Busse facility, Palatine facility, Carol Stream facility, and Bedford Park facility, mandatory training that encompasses how to tender the relevant information the Union requests; and each manager and supervisor will sign an acknowledgement form attesting to the fact that he or she has completed this training. In addition, Union stewards at our facilities listed above must be notified when the manager or supervisor who is designated to receive union requests for information at these facilities has changed.

**WE WILL** create, and if one already exists, update, our information request tracking system at our Cardiss Collins facility, Busse facility, Palatine facility, Carol Stream facility, and Bedford Park facility by maintaining an information request log containing the following information: (a) a list of each request for information (RFI) submitted to the above facilities by or on behalf of the Union; (b) the name of the person making each RFI; (c) the name of our representative who acknowledged receipt of each RFI; (d) the date of receipt of each RFI; (e) a general description of the information requested, or reference to a copy of the RFI attached to the log; (f) the date each

RFI was responded to; and (g) a summary of our response to each RFI, including who the response was provided to and what information was provided or refused and why.

**WE WILL**, at least once on a quarterly basis on a schedule that is mutually agreeable to both the Union and the United States Postal Service, submit the information request log to the Union for review; and notify Union stewards when the manager or supervisor who is designated to receive union requests for information at the above facilities has changed.

Charging Party (James Stevenson) Initials:  
Charging Party (Bhupendra Patel) Initials:  
Charging Party (Benjamin Johnson) Initials:  
Charged Party (United States Postal Service) Initials:

JS  
BP  
BJ  
AR