

## UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY						
Case No.						
Date Filed						-

CHARGE AGAINST AN	AGENCY	Date Filed			
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT		2. CHARGING PARTY			
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Nai	ne of Charging Party (i	nclude address, city, state, & ZIP)		
U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460	Ame P.O.	National Council of EPA Locals #238 American Federation of Government Employees (AFL-CIO) P.O. Box 2546 Chicago, IL 60690			
b. Agency Representative (include name, title, address)	b. Cha	arging Party Representa	ative (include name, title, address)		
Krysti Corbett Division Director Labor & Employee Relations (OARM/OHR/LERD)	Min 513:	Thomas F. Muther, Jr. Minahan Muther Klinger, PC 5132 W 26 Ave Denver, CO 80212			
tel. (202) 564-6295 fax (202) 564-812	21 tel. (	303)986-0054	fax (303)986-1137		
e-mail	e-ma	l	josh@cofedlaw.com		
<ul><li>a. Set forth a clear and concise statement of the facts constitution.</li></ul>					
On June 25, 2019, the Agency notified the Union of its intention to repudiate the 2007 Master Collective Bargaining Agreement along with the 2013 Groundrules and Addendum that were entered into by the parties to govern contract negotiations. Additionally, the Agency notified the Union of its intention to engage in bad faith bargaining by implementing a unilaterally imposed replacement "collective bargaining agreement" on July 8, 2019.  The Union specifically requests the FLRA to take steps to have the Agency's repudiation and bad faith bargaining attempts enjoined.					
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the	Agency has violated		(3) 🗆 (4) 🗖 (5) 🖻 (6) 🗀 (7) 🗀 (8) 🖻		
c. Have you or anyone else raised this matter in any other procedure? No  Yes If yes, where?    Grievance Procedure					
4. DECLARATION					
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.  THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]  In Person					
Thomas F. Muther	JR() A	T. Muthor	June 25, 2019		
Type or Print Your Name	Your Sign	ature	Date		

\* \* \* Communication Result Report ( Jun. 25. 2019 11:21AM ) \* \* \*

Date/Time: Jun. 25. 2019 11:18AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
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E. 1) Hang up or line fail

E. 2) Busy

E. 3) No answer

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E. 6) Destination does not support IP-Fax

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U.S. Environmental Protection Agency	National Council of EPA Locals #235			
1260 Pennsylvania Avenue, H.W. Washington, DC 20460	Aratrican Federation of Government Employees (AFL-CIO) P.G. Box 2546			
Waniston, Oc. 20400	Chicago, It. 60690			
D. Agency Agreementative (Include name, tile, address)	b Charging Party Reconstructive (Include name, Mile, address)			
W. and Conduction	Thomas F. Mother, Jr.			
Krysti Corbett Oháskon Director	Minahan Muther Klinger, PC			
Labor & Employee Relations (OARM/OHR/LERD)	5132 W 26 Ave Deriver, CO 80212			
tol. (202) 564-6295 for (202) 564-8121	tel. (303)986-0054 Nov. (303)986-1137			
e-m#	email josh@cofediaw.com			
3. DASIS OF THE CHARGE				
	ed unter labor practice, inducting date and location of the particular acts.			
and Atlandom that were retared into by the parties to govern control negotiations.  Additionally, the Agonary notified the Union of its intensitation to engage in bad girth to supplied by implementing a unilaterally imposed replacement "collective basigniting agreement" on July 8, 2019.  The Bridge production of the Bright to take stops to have the Agency's repudiation and bad fully bengaling attempts explained.				
19-0606				
6. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Assemy has y				
a. Have you or enjoyee else raised this resilier to any other procedure? No Re Yes D If yes, where?				
Li Griaveace Procedure   Traderal Mediation and Conciliation Service   Traderal Mediation and Conciliation Service   Traderal Mediation and Conciliation Service   Traderal Mediation and Conciliation   Traderal Mediation   Traderal Mediation				
L: Other Administration or todeful Proceeding   Negotiability Appeal to FLRA   Other    4 DECLARATION				
DEDARKETHAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUETO THE DEST OF MY KNOWLEDGE AND BEUEF.  JURIORISTIAND THAT ARASING WALLFULLY EXISE STATEMENTS CAN BE PUNGHED BY THE AUTO IMPRISONMENT, 28 LESC. 1008.				
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 15 BY [check of appropriate boxed]				
In Person   Int Class Mail				
Thomas F. Muther Jane 25, 2019				
Type or Prior Your Name	or Signation Date			
Form Persent Under 44 U.S.C. 3512	RRA Form 22 (Rev. 10/2014)			

\* \* \* Communication Result Report ( Jun. 25. 2019 11:21AM ) \* \* \*

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Date/Time: Jun. 25. 2019 11:19AM

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Reason for error
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E. 2) Busy
E. 4) No facsimile connection
E. 6) Destination does not support IP-Fax

FOR FIRA USE ONLY Casa No. CHARGE AGAINST AN AGENCY 2. CHARGING PARTY 1. AGENCY AGAINST WHICH CHARGE IS BROUGHT a. Name of Charging Party Surkets address, city, state, & lot) Name of Oregan Agency (Include address, city, state, \$120) National Council of EPA Locals #238
American Federation of Government Employees (ARL-CIO) U.S. Environmental Protection Agency 1200 Permishania Avenue, N.W. Washington, DC 20460 P.O. Box 2546 Chicago, IL 60590 b. Charging Party Representative (includes sums, side, saidress) b. Assecu Representative | lactude name, Dife, address] Thomas F. Mudher, Jr. Minglam Midher Klinger, PC 5132 W 75 Ave Denver, CD 80212 Krysti Corbett Labor & Employee Relations (OARM/ORR/LERD) f=c (202) 564-8171 bel (303)98G-0054 6er /3//3)986-1137 tel. (2012):564-**6**295 n-mall josh@cofedlaw.com 3. BASIS OF THE CHARGE a. Set forth a dear and concise statement of the facts constituting the akkged unital labor province, including data and incretion of the particular acts. On tune 25, 2019, the Agency notified the Union of its intention to repudints the 2017 Master Collective Expaining Agreement More with the 2013 Groundrules and Additionals that were cater-of into by the parties to govern contract negotiations. Additionally, the Agency notified the Union of its intention to engage in bad faith burgaring by implementing a unlisterally imposed replacement "collective bargaining agreement" on July 8, 2019, The Union specifically requests the FLRA to take steps to have the Agenty's repudency and bed faith bargaining attempts enjoined. 15-0606 b. Which submedically of S U.S.C. 7316(a) do you believe the Agency hor violated? (1) 日 (2) 日 (3) 日 (4) 日 (5) 日 (5) 日 (5) 日 c. Hampyou or expone else raised this matter in any other procedure? Mo IB: Vec CI | If yes, where?

1 is defended honordure: | Flederal Mediullion and Conciliations service: | Flederal Mediullion and Conciliations service: | Flederal Service Insparation Flederal Mediullion and Conciliations service: | Flederal Mediullion and Conciliations service: | Flederal Mediullion and Conciliation service: | Flederal Medi 4. DECLARATION I DICLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS WIIT ARE TRUE TO THE DEST OF MY KNOWLEDGE AND BELFA. I LUNDERSTAND THAT MASKIG WALFILLY FALSE STATEMENTS CAN BE PURSHED BY FIRE AND IMPRISONMENT, 18 U.S.C. 1001. · June 25, 2019 Type or Print Your Name Doto Form thempt Under 44 U.S.C. 3512 FLRA Form 22 (Rev. 10/2014)