

6. Statement of Facts: Provide a clear and concise statement of the facts constituting the alleged unfair labor practice(s), including the names of individuals involved and the dates and places of the occurrences giving rise to the charge. (If more space is required, add additional sheets.)

The Union has adopted a pattern and practice of harassing the President of CSTCC in the performance of his lawful duties. An orchestrated campaign by the union alleging that the President was guilty of theft in office as well as violation of numerous improprieties is clearly violative of O.R.C. 4117. This defamation of an individual and disruption of the workplace is not within the parameters of approved organized labor activity. Over 200 calls were received in the President's Office in nine (9) business days. This activity began on or about July 24 and continued through August 5, 2014. Secondly, on October 16, 2014, SEIU Representative Josh Norris requested the personnel files of: President Owens, EVP Carla Chance, HR Director Betty Young, and Labor Relations Manager Stephen Brooks, (Att.2). This request is clearly an attempt to harass and intimidate the college staff in the lawful performance of their duties. It is not sanctioned under the parameters of O.R.C. 4117.

A failure to provide the above information could result in the charge being dismissed for failure to provide a clear and concise statement.

DECLARATION

I declare that I have read the contents of this Unfair Labor Practice Charge and that the statements it contains are true and correct to the best of my knowledge and belief.

To distinguish originals, please do not use black ink for signatures.

Carla S. Chance

10-31-14

Signature of Person Attesting to Content of Form

Date

Carla Chance, Executive Vice-President, Cincinnati State Technical and Community College

Print or Type Name

THIS UNFAIR LABOR PRACTICE CHARGE WILL NOT BE ACCEPTED FOR FILING UNLESS THE PROOF OF SERVICE IS FULLY COMPLETED AND BEARS AN ORIGINAL SIGNATURE OF A REPRESENTATIVE OF THE PARTY FILING THE CHARGE.

PROOF OF SERVICE

I certify that an exact copy of the foregoing Unfair Labor Practice Charge has been sent or delivered to:

Josh Norris, District SEIU-1199, 1395 Dublin Road, Columbus, Ohio 43215

(Name and complete address of party against whom this charge is brought)

By Regular U.S. Mail Certified U.S. Mail Hand Delivery Other _____

this 5 (day) of November (month), 2014 (year).

Betty W. Young
Signature of Person Attesting to Service of Form

Betty W. Young
Print or Type Name

SEIU/District 1199
1395 Dublin Road
Columbus, Ohio 43215



614-461-1199 Main Switchboard
614-461-1549 Fax

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TO: Stephen Brooks, HR FAX: 5135691719

FROM: Josh Norris DATE: 8/1/14

RE: Public Records Request

Private and Confidential: The sender intends to communicate the contents of this transmission only to the person to whom it is addressed. This transmission may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are the employee or agent responsible for delivering this transmission to the recipient you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, please notify us immediately and promptly destroy the original transmission. Thank you for your assistance.

Writer's email address: jnorris@seiu1199.org

August 1, 2014

VIA FAX AND US MAIL and ELECTRONIC MAIL

RE: PUBLIC RECORDS REQUEST

Mr. Brooks:

In accordance with Ohio Rev. Code §149.43(A)(1), I am writing that I be provided with copies, at my expense, of certain public records on behalf of the Service Employees International Union (SEIU) District 1199. If you are not the individual responsible for public records requested, please forward this request to that individual or office and provide me with the name, address and telephone number of such. Specifically, I request the following records:

Any and all personnel files of Stephen Brooks, Carla Chance, Odell Owens and Betty Young, including, but not limited to any files kept by the College that have been redacted, removed, segregated, or otherwise kept separately that contain personnel information other than personal medical information on the abovementioned individuals. This request specifically encompasses any complaints and/or allegations made by any employee, student, and/or members of the public involving the named individuals for the time period of November 2011 through the date of this letter, as well as any finding made, and/or settlement or agreement entered into as a result of any complaint.

Division (B) of the Ohio Revised Code §149.43 states that public records shall be promptly prepared and made available for inspection at all reasonable times during regular business hours. That section goes on to state that upon request the person responsible for public records shall make copies available at cost within a reasonable period of time. The records requested can be provided on digital media in a commonly utilized format and forwarded to the e-mail address provided above. If more convenient for you, I will accept documents at fax number or address above or I will have the requested documentation picked up in person upon your notification. I will accept documents on a piece meal basis. I am prepared to pay reasonable costs for the copies, as well as pay for the cost for mailing such documents. I do request that a statement of those charges be prepared. Please provide documents to me on or before August 15, 2014.

If there is no documentation responsive to a particular request, please indicate such in writing. If you believe that this request is somehow defective or that you do not have to provide particular documents subject to the public records law, please specify under which exemption you believe the documents qualify. I thank you in advance for your cooperation.

Sincerely,
Joshua Norris
Public Division Director
SEIU District 1199 WV/KY/OH
614-461-1199
JNorris@seiu1199.org