

UNITED STATES OF AMERICA  
 NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
01-CA-223864	7/17/18

**INSTRUCTIONS:**

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Healthcare Services Group, a single and joint Employer with Waterbury Gardens, LLC and Priority Health Group		b. Tel. No. see attached
d. Address (street, city, state ZIP code) See attached		c. Cell No.
e. Employer Representative See attached		f. Fax No. see attached
		g. e-Mail:
		h. Dispute Location (City and State) Waterbury, CT
i. Type of Establishment (factory, nursing home, hotel): Nursing Home	j. Principal Product or Service Healthcare	k. Number of workers at dispute location 120

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsection (1) and (let subsections) (5) 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)

Beginning on or about July 16, 2018 and continuing, the Employer violated the act by implementing changes to the terms and conditions of employment without reaching impasse with the Union.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

New England Health Care Employees Union District 1199-SEIU

4a. Address (street and number, city, state, and ZIP code)

77 Huyshope Avenue, First Floor, Hartford, CT 06106-7000

4b. Tel. No. (860) 549-1199

4c. Cell No. (203) 494-6928

4d. Fax No. (860) 251-6049

4e. e-Mail sclark@seiu1199ne.org

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)

Service Employees International Union

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.

Tel. No. (860) 549-1199

By:   
(signature of representative or person making charge)

Suzanne Clark Vice President  
Print Name and Title

Office, if any, (860) 251-6026

Cell No. (203) 494-6928

Fax No. (860) 251-6049

Address: 77 Huyshope Avenue, First Floor,  
Hartford, CT 06106-7000

Date: 7/17/18

e-Mail sclark@seiu1199ne.org

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

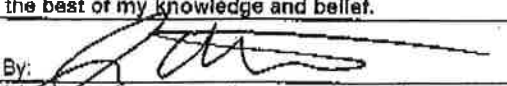
Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine 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.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
01-CA-224635	July 31, 2018

**INSTRUCTIONS:**

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT		
a. Name of Employer Healthcare Services Group, a single and joint Employer with Waterbury Gardens, LLC and Priority Health Group		b. Tel. No. see attached
d. Address (street, city, state ZIP code) See attached		c. Cell No.
e. Employer Representative See attached		f. Fax No. see attached
		g. e-Mail:
		h. Dispute Location (City and State) Waterbury, CT
i. Type of Establishment (factory, nursing home, hotel): Nursing Home	j. Principal Product or Service Healthcare	k. Number of workers at dispute location 120
l. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsection (1) and (list subsections) <u>3 and (5)</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 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)		
<p>Beginning on or about June 28, 2018 and continuing, the Employer violated the Act by:</p> <ol style="list-style-type: none"> <li>1. Implementing changes to the terms and conditions of employment without reaching impasse with the Union by unilaterally changing pay stubs and paid time accruals;</li> <li>2. Implemented the unilateral change in pay stubs and accruals in retaliation for the employees' engaging in protected union activities;</li> <li>3. Erosion of bargaining unit work, by replacing bargaining unit employees with non-union supervisors/managers;</li> <li>4. Threatening workers with layoff in retaliation for engaging in protected union activities.</li> </ol>		
3. Full name of party filing charge (if labor organization, give full name, including local name and number) New England Health Care Employees Union District 1199-SEIU		
4a. Address (street and number, city, state, and ZIP code) 77 Huyshope Avenue, First Floor, Hartford, CT 06106-7000		4b. Tel. No. (860) 549-1199
		4c. Cell No. 413-320-8104
		4d. Fax No. (860) 251-6049
		4e. e-Mail jmartin@seiu1199ne.org
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) Service Employees International Union		
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.		Tel. No. (860) 549-1199
By:  (signature of representative or person making charge)	Jesse Martin, Vice President Print Name and Title	Office, if any, (860) 251-6038 Cell No. 413-320-8104
Address: 77 Huyshope Avenue, First Floor, Hartford, CT 06106-7000	Date: 7/30/18	Fax No. (860) 251-6049
		e-Mail jmartin@seiu1199ne.org

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**PRIVACY ACT STATEMENT**

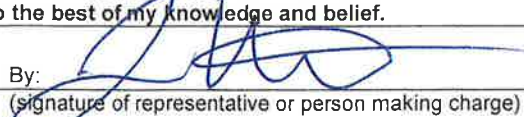
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UNITED STATES OF AMERICA  
 NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**  
**First Amended Charge**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

**INSTRUCTIONS:**

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

<b>1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT</b>		
a. Name of Employer Waterbury Gardens, LLC; a single and joint Employer with and Priority Health Group and Healthcare Services Group, Inc.		b. Tel. No. see attached
d. Address (street, city, state ZIP code) See attached		c. Cell No.
e. Employer Representative See attached		f. Fax No. see attached
i. Type of Establishment (factory, nursing home, hotel): Nursing Home		g. e-Mail:
j. Principal Product or Service Healthcare		h. Dispute Location (City and State) Waterbury, CT
		k. Number of workers at dispute location 120
l. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsection (1) and (list subsections) <u>and (5)</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 unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge ( <i>set forth a clear and concise statement of the facts constituting the alleged unfair labor practices</i> )		
<p>Beginning on or about September 27, 2018 and continuing, the Employer violated the Act by:</p> <ol style="list-style-type: none"> <li>1. Unlawfully declaring impasse in the parties' negotiation for a new collective bargaining agreement ("CBA");</li> <li>2. Unilaterally implementing its economic proposals prior to reaching lawful impasse with the Union in negotiations for a new CBA;</li> <li>3. Failure to provide requested information necessary for the Union to evaluate the Employer's economic proposals prior to the Employer unlawfully declaring impasse and unilaterally implementing those proposals.</li> </ol> <p>Because the Employer's repudiation of the of the collective bargaining process will cause irreparable damage to the Union if left unremedied pending the ulp investigatory and prosecutorial processes, the Union respectfully requests that the Regional Director promptly seek permission from the General Counsel to pursue 10(j) injunctive relief against the Employer in this case.</p>		
3. Full name of party filing charge ( <i>if labor organization, give full name, including local name and number</i> ) New England Health Care Employees Union District 1199-SEIU		
4a. Address (street and number, city, state, and ZIP code) 77 Huyshope Avenue, First Floor, Hartford, CT 06106-7000		4b. Tel. No. (860) 549-1199
		4c. Cell No. 413-320-8104
		4d. Fax No. (860) 251-6049
		4e. e-Mail jmartin@seiu1199ne.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit ( <i>to be filled in when charge is filed by a labor organization</i> ) Service Employees International Union		
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.		Tel. No. (860) 549-1199
By:  (signature of representative or person making charge)	Jesse Martin, Vice President Print Name and Title	Office, if any, (860) 251-6038 Cell No. 413-320-8104
Address: 77 Huyshope Avenue, First Floor, Hartford, CT 06106-7000	Date: 10/2/18	Fax No. (860) 251-6049
		e-Mail jmartin@seiu1199ne.org

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UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
01-CA-229421	Oct. 16, 2018

## INSTRUCTIONS:

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Waterbury Gardens, LLC; a single and joint Employer with and Priority Health Group and Healthcare Services Group, Inc.		b. Tel. No. see attached
d. Address (street, city, state ZIP code) See attached		c. Cell No.
e. Employer Representative See attached		f. Fax No. see attached
		g. e-Mail:
		h. Dispute Location (City and State) Waterbury, CT
i. Type of Establishment (factory, nursing home, hotel): Nursing Home	j. Principal Product or Service Healthcare	k. Number of workers at dispute location 120

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsection (1) and (list subsections) and (5) 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)

The Union first became aware on 10/8/18 that the Employer has failed to pay wages and benefits required by the contract. The Employer has also engaged in the following activities.

- The Employer has failed to provide requested information with regard to members wages and benefits.
- The Employer has failed to notify the union in order to miss lead the union about who were bargaining unit employees.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

New England Health Care Employees Union District 1199-SEIU

4a. Address (street and number, city, state, and ZIP code)

77 Huyshope Avenue, First Floor, Hartford, CT 06106-7000

4b. Tel. No. (860) 549-1199

4c. Cell No. 413-320-8104

4d. Fax No. (860) 251-6049

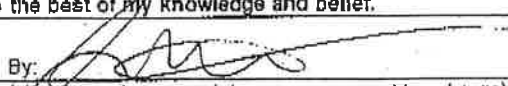
4e. e-Mail jmartin@seiu1199ne.org

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)

Service Employees International Union

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.

Tel. No. (860) 549-1199

By:   
(signature of representative or person making charge)

Jesse Martin, Vice President

Print Name and Title

Office, if any, (860) 251-6038

Cell No. 413-320-8104

Fax No. (860) 251-6049

e-Mail jmartin@seiu1199ne.org

Address: 77 Huyshope Avenue, First Floor,  
Hartford, CT 06106-7000

Date: 10/16/18

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**Healthcare Services Group, Inc**

Stu Fishberg

27 Meriden Ave Suite 3b

Southington, CT 06489

Cell: (914) 760-8674

Fax: (800) 886-2175

[sfishberg@hcsgrcorp.com](mailto:sfishberg@hcsgrcorp.com)

**Waterbury Gardens**

Avi Rosenbloom, Administrator

128 Cedar Ave

Waterbury, CT 06705

Phone: (203) 757-9271

Cell: (203) 706-1702

Fax: (203) 757-2988

[Slerner@waterbury-phg.com](mailto:Slerner@waterbury-phg.com)

**Priority Healthcare Group**

David Gamzeh, Regional Director

99 W Hawthorne Avenue, Suite 508

Valley Stream, NY 11580

Phone: (718) 879-3050

Cell: (516) 426-6961

Fax: (610) 833-4361

[dgamzeh@phg-us.com](mailto:dgamzeh@phg-us.com)