

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF LABOR RELATIONS CHARGE OF PROHIBITED PRACTICE M.G.L. c.150E

Case No.	Date Filed	i di
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INSTRUCTIONS: Answer all applicable questions. Failing	to provide information may result in the o	dismissal of the charge.		
Note: Pursuant to 456 CMR 15.04, the DLR will not issue a complaint unless the charging party has complied with the applicable provisions				
of M.G.L. c.150E, §§13 and 14.				
1. Employer	Representative to contact	4. Telephone Number		
Public Schools of Brookline	Elizabeth Valerio, Esq.	617-862-2005		
3. Address (street and No., city/town, state, and ZIP coo	Sign 7	5. Fax Number		
Valerio Dominello & Hillman, LLC, One University Avenue				
	7. Representative to contact	9. Telephone Number		
Brookline Educators Union	Ashley Walter, Attorney	617-878-8286		
<ol><li>Address (street and No., city/town, state, and ZIP cod</li></ol>	de)	10. Fax Number		
Mass. Teachers Assoc., 2 Heritage Dr., Quincy, M.	A 02171	617-248-6921		
11. This charge is filed against (check one)				
✓ Employer	Employee Organization			
12. The above named employer or employee organization has engaged or is engaging in a prohibited practice within the meaning of Massachusetts General Law, Chapter 150E, Section(s) (enter all appropriate sections/subsections)				
10(a)1, 10(a)2 and 10(a)5				
Failing to specify an appropriate section/subsection may result in the dismissal of the charge.  13. Summary of basis of Charge (be specific as to names, dates, addresses, etc.)				
On December 11, 2018, the Union and the Employer met to begin successor negotiations for their three collective bargaining agreements. This first meeting was to discuss ground rules for the three sets of negotiations. The parties did not come to agreement				
over the ground rules.	•			
On February 25, 2019, the parties met to begin substantive ne	egotiations for the Paraprofessional Unit.	The Union appeared with a		
negotiation team comprised of 45 members from all bargaini of whom were silent representatives. The Employer refused to	ng units; 15 of whom were designated spea	tuted. The Employer		
informed the Union that it would bargain if the Union altered	the composition of its bargaining team to	exclude the 30 silent		
bargaining representatives, not objecting to the presence of n to retain its full team, including the silent representatives.	nembers from other bargaining units. The	Union maintained its choice		
The Employer offered to negotiate with the Union if it reconf again chose to retain its original team. The Employer then as	igured its team, but again without silent re nnounced it would leave and be in caucus i	epresentatives. The Union		
bargaining session if the Union changed its mind. The Union	asked the Employer to confirm its refusal	to bargain was due to the		
composition of the Union's team. The Employer confirmed. I practice charge. The Employer proceeded to leave the room.	The Union verbally expressed its intention	to file this unfair labor		
By its conduct, the Employer has violated Sections 10(a)(1), 1	0(a)(2) and 10(a)(5) of the Law			
by its conduct, the Employer has violated sections 10(a)(1), 1	o(a)(2) and 10(a)(3) of the Law.			
		8		
		8		
By these and other acts, the party complained of has interfered with, restrained, and/or coerced rights guaranteed by the Law.				

14. (a) Is there a collective bargaining agreement that alleged to have violated the Law?	at may apply to the conduct that is	☐ Yes ✓ No
(b) If you checked "Yes" in question 14(a), please	e list all of the clauses alleged to apply and a	attach a copy of each.
(c) Is there a grievance concerning this matter pe		Yes V No
15. Without limiting your rights to later amend your reamount of any financial remedy to which you claim	m entitlement.	
Order the Employer to negotiate in good faith	with the team designated by the Union	n; posting
16. Have you attempted to settle this case?  If not, why not?		✓ Yes No
Note: The DLR may decline to issue a complaint unless reasonable the charging party. 456 CMR 15.04(1).	onable settlement efforts have been made by	
	TION ON CHARGING PARTY	
17. Name	18. Representative to contact	20. Telephone Number
Brookline Educators Union	Ashley Walter, Attorney	617-878-8286
19. Address (street and No., city/town, state, and ZIP	code)	21. Fax Number
MTA, 2 Heritage Drive, Quincy, MA 02171		617-248-6921
22. The Charging Party is an: Individual	Employee Organization	Employer
	DECLARATION	
I have read the above charge of prohibited practice information contained in it is true and complete to t	and swear under the pains and penalties	of perjury that the
Name (print) Signatur	re _ AIN	Title (if any)
Philip Katz	Ten My	Field Representative
Address (street and no., city/town, state, and ZIP code)		Telephone Number
MTA, 2 Heritage Drive, Quincy, MA 02171		781-380-1410
CERT	TIFICATE OF SERVICE	
I hereby certify that I have served a copy of this Cha opposing party.	rge of Prohibited Practice on the following	ng representative of the
	et and no., city/town, state, and ZIP code)	Telephone Number
	inello & Hillman, LLC ty Avenue, Suite 300B Westwood, MA 02090	617-862-2005
Method of Service In hand	First Class Mail Other (spec	cify): Elizabeth.Valerio@VDHBoston.com
Signature of Person making Certification		Telephone Number
Patricia Baczek, Regional Coordinator		781-380-1410



## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF LABOR RELATIONS CHARGE OF PROHIBITED PRACTICE

Case No.	Date Filed
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	M.G.L. c.150E	n.			
INSTRUCTIONS: Answer all applicable qu	uestions. Failing	to provide information m	nay result in the dis	smissal of the charge.	
Note: Pursuant to 456 CMR 15.04, the DLR will not	issue a complaint unl	ess the charging party has co	emplied with the applica	able provisions	
of M.G.L. c.150E, §§13 and 14.	ocac a complaint am	ess and emanging party mas es	The second secon	F	
			4. Telephone Number		
<b>Public Schools of Brookline</b>		Elizabeth Valerio, I	•	617-862-2005	
<ol><li>Address (street and No., city/town, s</li></ol>	tate, and ZIP cod	de)		5. Fax Number	
Valerio Dominello & Hillman, LLC, One U	niversity Avenue,	, Suite 300B Westwood,	MA 02090		
6. Employee Organization (if any):	15. 88	7. Representative to co	ntact	9. Telephone Number	
Brookline Educators Union (Unit A	.)	Ashley Walter, Atto	rney	617-878-8286	
8. Address (street and No., city/town, state, and ZIP code) 10. Fax Number			10. Fax Number		
Mass. Teachers Assoc., 2 Heritage I	Dr., Quincy, M.	A 02171		617-248-6921	
11. This charge is filed against (check one)					
✓ Femiliary		Employee (	)ragnization		
Employer Employee Organization  12. The above named employer or employee organization has engaged or is engaging in a prohibited practice within the				_	
meaning of Massachusetts General Law, Chapter 150E, Section(s) (enter all appropriate sections/subsections)					
10(a)1, 10(a)2, and 10(a)5					
Failing to specify an appropriate section/subsection may result in the dismissal of the charge.					
13. Summary of basis of Charge (be specific as to names, dates, addresses, etc.)					
On December 11, 2018, the Union and the Employer met to begin successor negotiations for their three collective bargaining agreements. This first meeting was to discuss ground rules for the three sets of negotiations. The parties did not come to agreement over the ground rules.					
On March 4, 2019, the parties met to begin substantive negotiations for the teachers' bargaining unit, Unit A. The Union appeared with a negotiation team comprised of 50 members from all bargaining units; 15 of whom were designated speaking representatives and 35 of whom were silent representatives. The Employer refused to bargain with the Union's team as constituted. The Employer informed the Union that it would bargain if the Union altered the composition of its bargaining team to exclude the silent bargaining representatives, not objecting to the presence of members from other bargaining units.				es er	
The Union maintained its choice to retain its full team, including the silent representatives. The Employer announced it would leave and be in caucus until the scheduled end of the bargaining session if the Union changed its mind. The Union told the Employer that that was not necessary since the Union was firm in its decision to maintain its full team. The Employer exited and negotiations ended.					
By its conduct, the Employer has violated S	Sections 10(a)(1), 1	10(a)(2) and 10(a)(5) of the	ne Law.		
				ha Laur	
By these and other acts, the party complaine	d of has interfered wit	th, restrained, and/or coerced	rights guaranteed by t	ne Law.	

14.	(a) Is there a collective bargaining agreement that alleged to have violated the Law?	may apply to the conduct that is	☐ Yes ✓ No		
	(b) If you checked "Yes" in question 14(a), please list all of the clauses alleged to apply and attach a copy of each.				
	(c) Is there a grievance concerning this matter pen		Yes No		
15.	Without limiting your rights to later amend your remamount of any financial remedy to which you claim	entitlement.			
Or	der the Employer to negotiate in good faith w	vith the team designated by the Union	n; posting		
16.	Have you attempted to settle this case? If not, why not?		Yes No		
	Note: The DLR may decline to issue a complaint unless reason the charging party. 456 CMR 15.04(1).	nable settlement efforts have been made by			
	INFORMATI	ION ON CHARGING PARTY			
17.	Name	18. Representative to contact	20. Telephone Number		
Bro	okline Educators Union	Ashley Walter, Attorney	617-878-8286		
19.	Address (street and No., city/town, state, and ZIP c	code)	21. Fax Number		
MT	A, 2 Heritage Drive, Quincy, MA 02171		617-248-6921		
22.	The Charging Party is an: Individual	Employee Organization	Employer		
		DECLARATION			
	re read the above charge of prohibited practice a mation contained in it is true and complete to the	and swear under the pains and penalties	of perjury that the		
Name	e (print) Signature	o e 1 m A	Title (if any)		
Phil	lip Katz	lul 3th.	Field Representative		
Addre	ess (street and no., city/town, state, and ZIP code)		Telephone Number		
MT.	A, 2 Heritage Drive, Quincy, MA 02171		781-380-1410		
	CERTI	IFICATE OF SERVICE			
	eby certify that I have served a copy of this Char osing party.	ge of Prohibited Practice on the following	ng representative of the		
Name	The state of the s	and no., city/town, state, and ZIP code)	Telephone Number		
Eliz		nello & Hillman, LLC v Avenue, Suite 300B Westwood, MA 02090	617-862-2005		
Meth	od of Service In hand	First Class Mail Other (spec	cify): Elizabeth.Valerio@VDHBoston.com		
Signs	ature of Person making Certification	<u> </u>	Telephone Number		
Signa	Patricia Baczek, Regional Coordinator		Telephone Number		
	- minu Julien, regional Coolainator	Secret Sacret	781-380-1410		



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INSTRUCTIONS: Answer all applicable questions. Failing	to provide information may result in the	dismissal of the charge.		
Note: Pursuant to 456 CMR 15.04, the DLR will not issue a complaint unless the charging party has complied with the applicable provisions of M.G.L. c.150E, §§13 and 14.				
1. Employer	2. Representative to contact	4. Telephone Number		
Public Schools of Brookline	Elizabeth Valerio, Esq.	617-862-2005		
<ol><li>Address (street and No., city/town, state, and ZIP cod</li></ol>	de)	5. Fax Number		
Valerio Dominello & Hillman, LLC, One University Avenue	, Suite 300B Westwood, MA 02090			
6. Employee Organization (if any):	7. Representative to contact	9. Telephone Number		
Brookline Educators Union (Unit B)	Ashley Walter, Attorney	617-878-8286		
8. Address (street and No., city/town, state, and ZIP coo	le)	10. Fax Number		
Mass. Teachers Assoc., 2 Heritage Dr., Quincy, M	A 02171	617-248-6921		
11. This charge is filed against (check one)				
✓ Employer	Employee Organization			
12. The above named employer or employee organizatio	n has engaged or is engaging in a prohi			
meaning of Massachusetts General Law, Chapter 150E, Section(s) (enter all appropriate sections/subsections)				
10(a)1, 10(a)2, and 10(a)5				
Failing to specify an appropriate section/subsection may result in the dismissal of the charge.				
13. Summary of basis of Charge (be specific as to names, dates, addresses, etc.)				
On December 11, 2018, the Union and the Employer met to begin successor negotiations for their three collective bargaining				
agreements. This first meeting was to discuss ground rules for the three sets of negotiations. The parties did not come to agreement				
over the ground rules.				
On March 7, 2019, the parties met to begin substantive negot				
with a negotiation team comprised of 50 educators from all b				
and 30 of whom were silent representatives. The Employer informed the Union that it would bargain if the Union altered				
representatives, not objecting to the presence of members from				
The Union maintained its choice to retain its full team, include	ling the silent representatives. The Empl	over announced it would leave		
and be in caucus until the scheduled end of the bargaining se	ssion if the Union changed its mind. The	Union told the Employer that		
that was not necessary since the Union was firm in its decision	n to maintain its full team. The Employe	r exited and negotiations		
ended.				
By its conduct, the Employer has violated Sections 10(a)(1), 1	0(a)(2) and 10(a)(5) of the Law.			
By these and other acts, the party complained of has interfered with, restrained, and/or coerced rights guaranteed by the Law.				

14. (a) Is there a collective bargaining agreement tha alleged to have violated the Law?	at may apply to the conduct that is	☐ Yes ✓ No		
(b) If you checked "Yes" in question 14(a), please	(b) If you checked "Yes" in question 14(a), please list all of the clauses alleged to apply and attach a copy of each.			
(c) Is there a grievance concerning this matter pe	ending?	☐ Yes ✓ No		
15. Without limiting your rights to later amend your re amount of any financial remedy to which you clair	m entitlement.			
Order the Employer to negotiate in good faith	with the team designated by the Unior	i; posting		
16. Have you attempted to settle this case? If not, why not?		✓ Yes No		
Note: The DLR may decline to issue a complaint unless reasonable the charging party. 456 CMR 15.04(1).	onable settlement efforts have been made by			
INFORMA	TION ON CHARGING PARTY			
17. Name	18. Representative to contact	20. Telephone Number		
Brookline Educators Union	Ashley Walter, Attorney	617-878-8286		
19. Address (street and No., city/town, state, and ZIP code)		21. Fax Number		
MTA, 2 Heritage Drive, Quincy, MA 02171		617-248-6921		
22. The Charging Party is an: Individual	Employee Organization	Employer		
	DECLARATION			
I have read the above charge of prohibited practice information contained in it is true and complete to t		of perjury that the		
Name (print) Signatu	re O / CC	Title (if any)		
Eric Shiff, Grievance Chair	c Shiff (pmb)	Grievance Chair		
Address (street and no., city/town, state, and ZIP code)		Telephone Number		
Brookline Educators Union, 115 GgreenoughSt	t., Brookline, MA 02445-6151	617-277-0251		
CER	TIFICATE OF SERVICE			
I hereby certify that I have served a copy of this Chaopposing party.	arge of Prohibited Practice on the followir	ng representative of the		
	et and no., city/town, state, and ZIP code)	Telephone Number		
	ninello & Hillman, LLC ity Avenue, Suite 300B Westwood, MA 02090	617-862-2005		
Method of Service In hand	First Class Mail Other (spe	Cify): Elizabeth.Valerlo@VDHBoston.com		
Signature of Person making Certification		Telephone Number		
Patricia Baczek, Regional Coordinator	the Ken O	781-380-1410		
The state of the s	DOLCIA . I NIMUA W >			