


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

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer  Clara Maass Medical Center ("CMMC") and RWJBarnabas Health Inc. ("RWJ")	b. Tel. No. (908) 580-1776
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) CMMC: 1 Clara Maass Drive Belleville, NJ 07109  RWJ: 94 Old Short Hills Rd Livingston, NJ 07039	e. Employer Representative Robert T. Clarke, Esq.
	g. e-mail clarke@ammm.com
	h. Number of workers employed 525
i. Type of Establishment (factory, mine, wholesaler, etc.) acute care hospital	j. Identify principal product or service health care
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) 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 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) Since on or about a date in the six months preceding the filing of this charge, the above-named Employer has failed and refused to bargain in good faith with 1199SEIU United Healthcare Workers East, the exclusive bargaining representative of its employees, by (1) insisting on proposals that give it unilateral control over virtually every significant aspect of the employment relationship, including but not limited to wages, hours, health benefits, retirement benefits, vacation and other paid time off, and the performance of bargaining unit work; and (2) engaging in regressive bargaining.  By these and other acts, the above-named Employer has violated Section 8(a)(1) and (5) of the Act.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) 1199SEIU United Healthcare Workers East	
4a. Address (Street and number, city, state, and ZIP code)  555 Route 1 South, 3rd Floor, Iselin, NJ 08830	4b. Tel. No. (732) 287-8113
	4c. Cell No.
	4d. Fax No. (732) 287-8117
	4e. e-mail
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.   <hr/> <i>(signature of representative or person making charge)</i>	
Amelia K. Tuminaro <hr/> <i>(Print/type name and title or office, if any)</i>	
Tel. No. (212) 228-7727	
Office, if any, Cell No.	
Fax No. (212) 228-7654	
e-mail atuminaro@grmny.com	
Gladstein Reif & Meginniss LLP Address 39 Broadway, Suite 2430, NY, NY 10006 Date Apr 1, 2024	

**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 may cause the NLRB to decline to invoke its processes.