

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 Keolis Transit America	b. Tel. No. (775) 379-5405
	c. Cell No.
d. Address (Street, city, state, and ZIP code) 2050 Villanova Drive Reno, NV 89502	f. Fax No.
	e. Employer Representative Phil Pumphrui, General Manager
	g. e-mail Phil.pumphrui@keolisna.com
	h. Number of workers employed
i. Type of Establishment (factory, mine, wholesaler, etc.) Bus company	j. Identify principal product or service Reno Transit District Contractor
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list 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 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) Within the past six months Keolis violated the Act by sabotaging bargaining. Keolis' failure to bargain includes but is not limited to 1) proposing to eliminate the Teamster Health & Welfare Fund benefit claiming the Teamster Fund fails to deal with employee questions but refusing to timely provide the Fund the identity of new employees, 2) proposing to eliminate the current job bidding procedure but failing to show shift distribution under the employer proposal, 3) blaming the Union for cancelled trips caused by Keolis' failure to hire and schedule a sufficient number of drivers, 4) as of July 6, 2021, refusing to provide information on any of its other outstanding take away proposals while demanding bargaining meetings, and 5) trying to provoke a strike.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Teamsters Local 533	
4a. Address (Street and number, city, state, and ZIP code) 1190 Selmi Drive, #100 Reno, NV 89512	4b. Tel. No. (775) 348-6060
	4c. Cell No. (775) 527-2391
	4d. Fax No. (775) 348-1501
	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) International Brotherhood of Teamsters Local 533	
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. Matthew Gauger, Attorney	
(Signature of representative or person making charge)	(Print/type name and title or office, if any)
Tel. No. (916) 443-6600	
Office, if any, Cell No.	
Fax No. (916) 442-0244	
e-mail mgauger@unioncounsel.net	
Address 431 I Street, Suite 202, Sacramento, CA 95814	Date July 27, 2021

**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.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of Sacramento County, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 431 I Street, Suite 202, Sacramento, California 95814.

On July 27, 2021, I served the within:

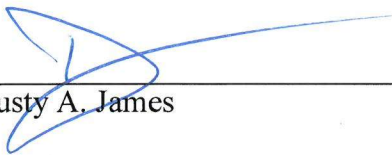
Teamsters Local 533 v. Keolis Transit America

CHARGE AGAINST EMPLOYER

- (By U.S. Mail) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing with the United States Parcel Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Sacramento, California.
- (By Facsimile) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- (By Overnight Mail) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by United Parcel Service for overnight delivery.
- (By Electronic Service) I electronically mailed a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system to the email addresses set forth below.

Phil Pumphrui, General Manager
Keolis Transit America
2050 Villanova Drive
Reno, NV 89502
Phil.Pumphrui@keolisna.com

I certify under penalty of perjury under the laws of the State of California that the above is true and correct. Executed at Sacramento, California on July 27, 2021.



Dusty A. James