

Direct Number: (515) 283-3170 | Facsimile: (515) 283-3108 | E-Mail: fharty@nyemaster.com 700 Walnut, Suite 1600 | Des Moines, IA 50309-3899 | (515) 283-3100

Attorneys at Law | Offices in Des Moines, Ames and Cedar Rapids

www.nyemaster.com

January 24, 2019

VIA EMAIL

Quinn Ercolani

Vice President, UGSDW

115 8<sup>th</sup> Avenue,

Grinnell, Iowa 50112

Dear Quinn,

I have been given a copy of your request to meet with President Kington to discuss expansion of the bargaining unit. The letter is inconsistent with the Union's request to withdraw its NLRB petition. It would not be appropriate for President Kington to meet with you, or any other student, as a representative of UGSDW for this purpose. If your request relates to the existing dining workers unit, please contact Mary Greiner.

In her December 20 letter, the Regional Director approved the Union's withdrawal request -- despite union conduct that was seemingly inconsistent with its request. She did so because the College did not oppose the union's withdrawal of its petition. Specifically, she stated: "The Region notes that there is publicly available information, including the Union's own press releases, which describe conduct that is arguably inconsistent with its request to withdraw."

The Union has engaged in a number of actions that demonstrate that its promise to the Regional Director is not true. Grinnell College has not, and will not, agree to expanding the UGSDW bargaining unit to cover virtually all of its students. As the College has explained it firmly believes that a campus-wide expansion of the student union is not in the best interest of the Grinnell College community.

Quinn, you and I sat opposite each other at the bargaining table. I hope you believe the College dealt with you in a straight forward manner. I learned after three decades of practicing labor law that honesty is the most important element of success: when you make a statement like the one you made to the National Labor Relations Board—you better live up to it. Once you have squandered your reputation for honesty you lose it forever. I hope that moving forward you and your fellow union leaders will act consistent with your promise to National Labor Relations Board.

Please let me know if you have any questions or if you wish to discuss this further.

Very Truly Yours

Frank Harty

FBH/nmg