

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD**

IN RE:)	
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REQUEST FOR INFORMATION)	
REPRESENTATION-CASE)	DOCKET ID NO.
PROCEDURES)	NLRB-2017-0001
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(DEC. 14, 2017))	3142-AA12
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**RESPONSE TO THE REQUEST FOR INFORMATION OF THE
LABORERS' INTERNATIONAL UNION
OF NORTH AMERICA (LIUNA)**

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ABOUT THE COMMENTATOR

Founded in 1903, the Laborers' International Union of North America (hereinafter, "LIUNA") is a general workers union representing nearly half a million employees in the construction industry and in public service in the United States and Canada. As the union of record in both Canada and the United States holding undisputed jurisdiction over the craft of construction laborer, LIUNA represents the men and women throughout North America who are responsible for constructing the buildings, roads, bridges, highways, energy and other critical infrastructure that makes life in the United States and Canada possible. LIUNA also represents significant numbers of workers in healthcare, construction-related manufacturing and energy.

SUMMARY

LIUNA respectfully submits this response to the Request for Information regarding whether the National Labor Relations Board ("NLRB") should retain New Rules adopted in 2014 to the NLRB's Representation-Case Procedures.

By every conceivable measure, the new rules for Representation Cases ("R-Cases") have been a success. Under the 2014 Rules, R-Cases are being processed 40% faster, as measured by the median days from petition to election. Even in contested cases, the cases are being processed approximately 44% faster. Moreover, elections are being conducted by mutual agreement of the parties at historically high rates – 91.7% in FY 2017 – with contested cases accounting for only 8.3% of all elections.¹

Under the New Rules, the NLRB is exceeding its own internal performance goals by previously unseen margins. Virtually all NLRB elections – 98.5% – are being conducted within 56 days of the filing of the petition – easily surpassing the Board's internal performance goal that 80% of contested elections be conducted within 56 days.

The new rules also have not produced the problems predicted by the rule's critics.

- 1.) *Free Speech Not Abridged.* The new rules have not abridged employer free speech rights. This can be confirmed by the fact that elections are being conducted by agreement at historically

¹ Data regarding median days to election were taken from <https://www.nlr.gov/news-outreach/graphs-data/petitions-and-elections/median-days-petition-election>.

high levels under the new rules. Relevantly, all voluntary election agreements include agreement as to the date of the election, and the elections by agreement are the fastest category of elections conducted by the Board. If employers felt that faster elections inhibited their ability to communicate to employees about the election, employers would not voluntarily agree to these election schedules. The sheer frequency with which employers have agreed to election schedules that are 40% faster than prior to the 2014 Rules demonstrates widespread employer sentiment that the New Rules accord sufficient time to communicate to their employees regarding the election.

- 2.) *Election Now-Hearing Later Disproved.* The new rules have not led to a system of “Election Now-Hearing Later.” Under the new rules, post-election hearings were held in 3.9% of cases in 2017 and 4.8% of cases in 2016, rates that are, if anything, *lower* than those seen before the 2014 Rules.² The hypothesis that the 2014 Rules would lead to a massive increase in post-election hearings to resolve election issues that were deferred during the pre-election hearing has been disproved.
- 3.) *The New Rules Provide a Fairer Process to All Parties.* Critics feared that the new rules would trample due process by foreclosing the hearing of evidence on certain positions and by excluding briefing in complex cases. The new rules, however, left the bulk of these decisions in the experienced hands of the Regional Directors, and Regional Directors have exercised these powers with sound discretion. Rather than comprehensively banning briefs, Regional Directors have permitted briefs in about 30% of contested cases decided under the new rules.³ As a measure of which cases involve complex and disputable issues, this number still seems high. By comparison, requests for review historically are filed in less than 10% of elections. In addition, imposition of preclusion as a sanction appears to be rare. Only four NLRB cases reported to Westlaw involved a case where a Regional Director had precluded a party from raising an issue at a pre-election hearing.
- 4.) *No Increased Invasions of Privacy.* Critics feared that the new Voter Eligibility Lists would lead to invasions of privacy

² Data derived from NLRB FOIA Request No. 2018-000434.

³ Data derived from NLRB FOIA Request No. 2018-000434.

because unions would be provided email addresses and cell phone numbers of all employees in the bargaining units. In the time since the rules were adopted, however, there have been no reported cases involving an abuse of this information by unions.

It also should be remembered that the 2014 Rules eliminated many aspects of the old rules that had outlived their usefulness and were deservedly abandoned. These include:

1.) *Interlocutory Request for Review Rightfully Deemphasized.* Although interlocutory appeals are permitted under the 2014 Rules, the role of the interlocutory appeal has been diminished by the fact that such appeals can be deferred until the end of the case without prejudice and by the fact that the election now proceeds with votes tallied even when interlocutory reviews are filed. The Board's historic experience strongly supported its decision to deemphasize the role of the interlocutory appeal in R-Cases. Between 1980 and 2009, the interlocutory request for review process resulted in an adjustment of the regional director's initial decision in only 0.7% of representation cases while prolonging these cases by an average median period of 257 days. *See Part VII, infra.* The 2014 Rules therefore rightfully deemphasized the interlocutory review.

2.) *Assignment of Cases to the Board for Initial Decision Rightfully Eliminated.* Since 1986, regional directors rarely saw fit to assign cases to the Board. Since 1996, regional directors have not assigned more than two cases per year. The 2014 Rules rightfully eliminated this obsolete procedure, which doubled the average time needed to conduct a representation election.

Those members who dissented when the NLRB adopted the new election rules wrote that they were not wedded to the system that existed before the new rules, but merely thought that any changes should be taken by consensus. In light of the objective evidence that the new rules have made elections swifter, less costly, less litigious, and fairer, it should not be difficult to form a consensus in support of retaining the rules as implemented in 2015.

I. UNDER THE NEW RULES, ELECTIONS ARE ADMINISTERED
40% MORE EFFICIENTLY.

Under the 2014 Rules, R-Cases are being processed 40% faster, as measured by the median days from petition to election. Under the 2014 Rules, the median number of days between the filing of the petition and the conduct of an election has shrunk from approximately 38 day to 23 days. Even in

contested cases, the cases are being processed approximately 44% faster. The median number of days between the filing of the petition and the conduct of the election in contested cases has shrunk from approximately 60 days to 36 days. Moreover, elections are being conducted by mutual agreement of the parties at historically high rates – 91.7% in FY 2017 – with contested cases accounting for only 8.3% of all elections.⁴

In addition, the NLRB is exceeding its own internal performance goals by previously unseen margins. Virtually all NLRB elections – 98.5% – are being conducted within 56 days of the filing of the petition, a level that far surpasses the Board’s internal performance goal that at 80% of contested elections be conducted within 56 days.

These statistics demonstrate the major achievement of the 2014 Rules in making the Board election process significantly more efficient. In light of this success, it would make no sense to reinstate the old rules, with their inefficiency and pointless delay. Instead, the new rules should be retained to permit unions, employees, employers, and especially the NLRB to enjoy the benefit from the newly obtained efficiencies.

Efficiency has an added importance in the face of increasing pressure from budget constraints. As shown below, the New Rules lessen the demand on Board resources by eliminating resource intensive procedural steps. This benefit is obtained without compromising the laboratory conditions of the election process. Given the adverse consequence to the Board on its ability to carry out its mission if the New Rules were set aside, the burden should be on those challenging the New Rules to show that the conservation of Board resources achieved by the New Rules comes at a demonstrable cost to the fairness of the election process. Mere theoretical concerns should be dismissed. In fact, as shown below, the New Rules have secured major advantages for the parties; the improved efficiency enjoyed by the Board is icing on the cake.

II. THE BOARD’S EXPERIENCE SHOWS THAT IT IS UNNECESSARY TO ESTABLISH A MINIMUM PERIOD OF TIME PRIOR TO AN ELECTION.

Prior members of the Board have criticized the new rules because the rules fail to establish any minimum period of time that must pass before an election will be held. *See, e.g., Election Rule, 79 Fed. Reg. 74308, 74459*

⁴ Data regarding median days to election were taken from <https://www.nlr.gov/news-outreach/graphs-data/petitions-and-elections/median-days-petition-election>.

(Dec. 15, 2014) (dissenting views of Members Miscimarra and Johnson). As argued in the prior section, the aggregate statistics demonstrate that the new Rules are overwhelmingly working to the satisfaction of both unions and employers. Based upon this, it can be fairly concluded that setting a minimum period of time before an election can be held is not necessary.

Critics have cited *European Imports, Inc.*, 365 NLRB No. 41 (Feb. 23, 2017) (Miscimarra, *dissenting*), as a case that provides an example of problems with the 2014 Rules. But even this case demonstrates the extent to which the New Rules overwhelmingly provide an appropriate amount of time prior to elections for all parties.

In *European Imports*, a directed election was conducted twenty days after the petition for an election was filed. The Employer argued that the election should have been held on March 1, 2017 or thereafter, at least thirteen days after the direction of election issued, rather than seven days, and filed an emergency request for review with the Board. The Employer asserted that the three days between the February 20 posting of the notice of election, in which the definite inclusion of certain employees was first communicated, and the February 23 election were inadequate. The Board denied the request for review, but the Acting Chairman, argued in dissent that the election should have been postponed and held on March 1, 2017.

The claim that three days' notice is inadequate is difficult to understand. Even prior to the adoption of the 2014 rule changes, the earliest that the Board's rules required the posting of a formal notice of an election was three days prior to the election,⁵ and that time period for posting the notice of election remained unchanged under the 2014 amendments.⁶ The Board's procedures never have had a formal mechanism for providing notice of the details of an election earlier than three days prior to an election. The only means for employees to learn of the details of the election earlier than three days prior has always been informal notice from the parties and other employees. Thus, the complaint that employees received only three-days' notice of their inclusion in the election depends upon the extent to which those included as eligible voters in the unit description at hearing had prior notice of the pending petition for representation and the competing positions of employees, trade union and employer. It is probable that this belatedly clarified group had known of and been involved in debate of the election, since employee notification of the election by either employer, the union, or other employees is presumed under the Board's long-standing process.

⁵ See 29 C.F.R. § 103.20(a) (prior to April 15, 2015).

⁶ See 29 C.F.R. § 102.67(k).

III. THE INCREASE IN THE CONDUCT OF ELECTIONS BY AGREEMENT DEMONSTRATES THAT THE NEW RULES DO NOT RESTRICT SPEECH OR OTHERWISE INFRINGE FIRST AMENDMENT PROTECTIONS.

Prior to the adoption of the new R-Case rules, critics objected that the new rules, with their accelerated schedule, would abridge the right of employers to communicate with their employees about the issues related to an R-Case election. The NLRB's experience under the new rules has demonstrated that these concerns were groundless.

The best evidence supporting the conclusion that the new rules provide employers with sufficient time to communicate with their employees about elections is that the rate at which parties stipulate or consent to elections has occurred at historically high levels under the new rules. This evidence is significant because elections by agreement actually occur under faster schedules than contested elections. Relevantly, all voluntary election agreements include agreement as to the date of the election. If employers felt that faster elections inhibited their ability to communicate to employees about the election, employers would not voluntarily agree to these election schedules. The sheer frequency with which employers' have agreed to election schedules that are 40% faster than prior to the 2014 Rules demonstrates widespread employer sentiment that the new rules accord sufficient time to communicate to their employees regarding the election.

Thus, the Board's experience under the new rules definitively establishes that the new rules leave employers sufficient time to communicate with their employees about issues related to representation elections.

In hindsight, this conclusion should not be surprising. There was no form of expression or any particular messages that were precluded by a 40% faster timetable between filing the petition and the election. Employers retain the right to hold captive audience meetings during the entire election period, except for twenty-four hours prior to the election.⁷ They also retain the right to disseminate even factually inaccurate election propaganda with impunity so long as the material is not fraudulent.⁸ Employers also retain the right to express any opinion it pleases, so long as it makes no threats and promises no

⁷ *Peerless Plywood*, 107 NLRB 618 (1966).

⁸ *Mid-Land Nat'l Life Ins. Co.*, 263 NLRB 127 (1982); *Shopping Kart Food Mkt.*, 228 NLRB 1311 (1977).

benefit.⁹ The Employer's right to utilize these modes of expression are not abridged in any way by the 2014 Rule.

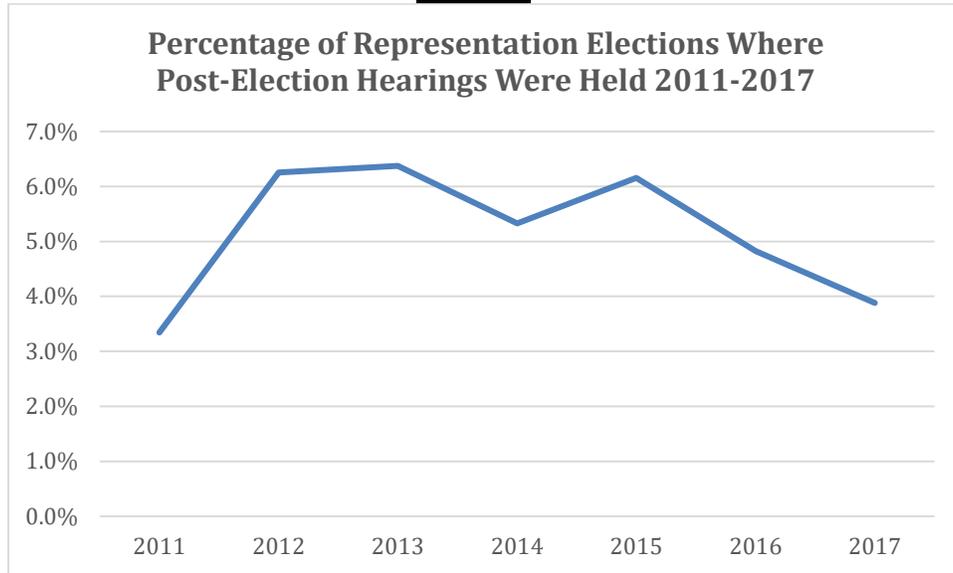
Furthermore, the timetable of representation elections before the 2014 Rules owed nothing whatsoever to considerations of employer speech rights. Rather, the old schedule was driven by the need to accommodate the interlocutory request for review, which the Board's experience has shown was a time-consuming and wasteful procedure. *See* Part VII, *infra*. Concerns about free speech, therefore, provide no grounds for returning to the old, protracted election schedule.

IV. THE NEW RULES HAVE *NOT* LED TO AN "ELECTION NOW-HEARING LATER" SYSTEM.

Critics of the Board's 2014 Rules hypothesized that the new rules would not reduce litigation, but instead would merely postpone litigation until after the election was held. The critics referred to this dynamic as "Election Now-Hearing Later." The Board's experience under the new rules, however, has definitively disproven this hypothesis.

Under the New Rules, post-election hearings were held in 3.9% of cases in 2017 and 4.8% of cases in 2016, rates that are, if anything, *lower* than those seen before the 2014 Rules. The incidence of Post-Election Hearings in Representation Cases in FY 2011 to FY 2017 is shown below.

⁹ 29 U.S.C. § 10(c).

Figure 1¹⁰

As can be seen from Figure 1 above, the incidence of post-election hearings under the new rules, if anything, has decreased. It certainly has not increased. The number of R-Cases where post-election hearings were held is shown below.

Table 1¹¹

	Post-Election Hearings
2011	47
2012	87
2013	90
2014	75
2015	94
2016	67
2017	53

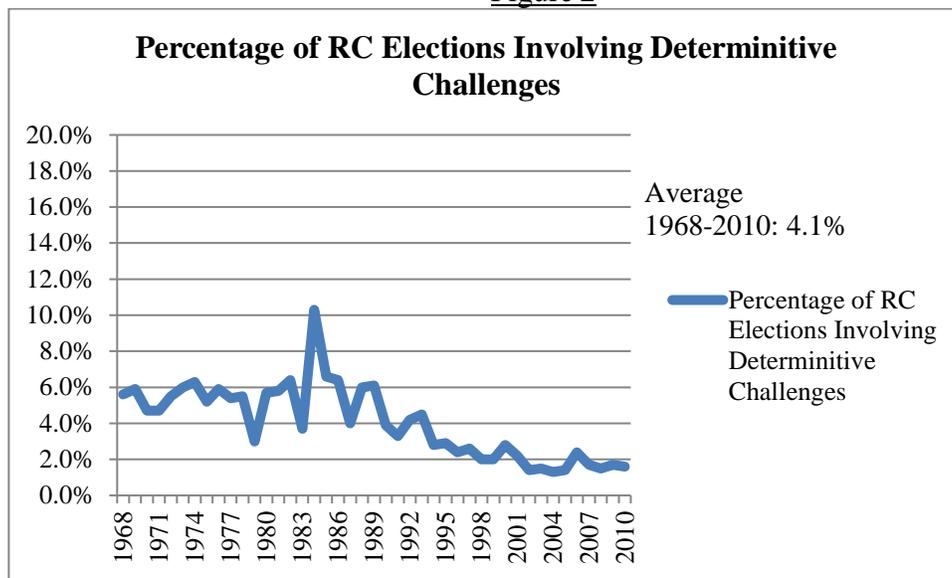
The prediction that the 2014 Rules would lead to a significant increase in post-election hearings to resolve election issues that had been deferred during the pre-election hearing has been definitively disproved by the Board's experience under the 2014 Rules.

¹⁰ Data derived from NLRB FOIA Request No. 2018-000434.

¹¹ Data derived from NLRB FOIA Request No. 2018-000434.

In hindsight, it is not surprising that post-election hearings continue to be rare. It has been the case for decades that disputes over voter eligibility rarely are relevant to the outcome of the election. As Figure 2 below demonstrates, challenged ballots were determinative in only a very small percentage of RC elections. Between 1968 and 2010, challenged ballots were determinative on average in 4.1% of RC elections. Even that average is influenced by higher rates of challenges prior to 1990s. Looking only at recent history, challenged ballots have not been determinative in more than 4% of RC elections since 1993.

Figure 2



In sum, the pre-election hearing under the 2014 Rules continues to be adequate to ensure that the vast majority of elections produce determinative results. To the extent that the new rules have eliminated unnecessary litigation during the pre-election hearing, the Board's experience under the new rules has confirmed that that litigation that has been eliminated indeed was unnecessary and irrelevant to the purposes of conducting fair and conclusive representation elections.

V. THE NEW RULES PROVIDE A FAIRER PROCESS TO ALL PARTIES.

Critics feared that the new rules would trample due process by foreclosing the hearing of evidence on certain positions and by excluding briefing in complex cases. The new rules, however, left the bulk of these

decisions in the experienced hands of the Regional Directors, and Regional Directors have exercised their discretion soundly. Rather than briefs having been comprehensively banned, Regional Directors have permitted briefs in about 30% of contested cases decided under the new rules.

Table 2¹²

Percentage of Cases Where Pre-Election Briefs Were Permitted	
2012	69.2%
2013	68.8%
2014	80.2%
2015	57.8%
2016	36.7%
2017	29.8%

As a measure of which cases involve the type of complex and disputable issues that warrant briefing, 30% still seems high. By comparison, requests for review historically are filed in less than 10% of elections.

Critics of the 2014 Rules also alleged that the New Rules that would oppressively preclude employers from presenting evidence on an issue anytime an employer made an innocent omission in its statement of position or was slightly tardy in serving it. Even though this rule is no different from the federal court practice of precluding parties from litigating a defense not raised in an answer to a complaint, critics of the 2014 Rules seemed to envision that the rule would be aggressively applied to employers to deny them a fair opportunity to represent their positions at pre-election hearings. In fact, the Board's two-year experience under the New Rules reveal that impositions of the preclusion sanction are exceedingly rare. Of cases with reported decisions, employers were precluded from presenting evidence at the pre-election hearing in only four cases.¹³

The infrequency of the use of preclusion is important because the Board must provide due process to all parties, not just employers, and extending due process to all parties requires balancing the parties' competing interests. The preclusion rule was instituted to solve an unfairness that the old

¹² Data derived from NLRB FOIA Request No. 2018-000434.

¹³ See *European Imports, Inc.*, 365 NLRB No. 41 (Feb. 23, 2017); *Williams-Sonoma Direct, Inc.*, 365 NLRB No. 13 (Jan. 9, 2017); *IGT Glob. Sols.*, 01-RC-176909, 2016 WL 7430323, at *1 (Dec. 21, 2016); *Brunswick Bowling Products, LLC*, 364 NLRB No. 96 (2016).

rules imposed upon petitioners. The problem was that parties opposing petitions were not specifically required to state the objections they had to the validity of the petition. Due to this absence, petitioners were forced into the unfair position of trying to prepare for hearings without having any formal notice of what issues of fact or law would be placed at issue. Also, because they were not required to formally state objections to petitions, obdurate parties were allowed to refuse to stipulate to any factual or legal issues while also refusing to state what their objections were. This gap in the rules allowed belligerent parties to make a mockery of the Board's processes while compelling the agency and the petitioner to litigate issues that were not genuinely in dispute.

The New Rules solved this problem by requiring the filing of a statement of position. For the requirement to be effective, though, a sanction had to exist for when the requirement is violated. Indeed, the effectiveness of a sanction is aptly measured by how effectively it coerces compliance. In this case, the Board's experience under the new rules suggests that the preclusion sanction is very effective, since it appears to have been imposed as few as four times. This record of infrequent use also supports the conclusion that the preclusion sanction is not being applied in an unfairly aggressive manner. Rather, the rule is operating as intended, incentivizing compliance with the statement-of-position requirement, and in doing so, providing a more fair process both to petitioners and to parties opposing petitions.

In sum, therefore, the Board's experience under the news rules strongly supports the conclusion that the new rules have made representation cases *more fair* to the parties, rather than less fair.

VI. THE NEW VOTER ELIGIBILITY LISTS HAVE NOT CAUSED ANY REPORTED INVASIONS OF PRIVACY.

Critics feared that the new Voter Eligibility Lists would lead to invasions of privacy because unions would be provided email addresses and cell phone numbers of all employees in the bargaining unit. In the time since the rules were adopted, however, there have been no reported cases involving an abuse of this information by unions.

VII. THE NEW RULES RIGHTFULLY DEEMPHASIZED INTERLOCUTORY REVIEW, WHICH DRAMATICALLY PROLONGED REPRESENTATION PROCEEDINGS WHILE OFFERING *DE MINIMUS* IMPROVEMENT IN THE RELIABILITY OF CASE OUTCOMES.

Although interlocutory appeals are permitted under the 2014 Rules, the role of the interlocutory appeal has been diminished by the fact that such appeals can be deferred until the end of the case without prejudice and by the fact that the election now proceeds and ballots are tallied even when interlocutory reviews are filed. The Board's historic experiences strongly supported its decision to deemphasize the role of the interlocutory appeal in R-Cases.

It is fundamental in the federal court system that interlocutory appeals are disfavored and should be reserved only for extraordinary circumstances.¹⁴ As the D.C. Circuit has stated, "'interlocutory appeals are generally disfavored as disruptive, time-consuming, and expensive' for both the parties and the courts."¹⁵ Moreover, interlocutory review may require the system to waste resources on disputes that may be mooted by subsequent developments. All of these reasons support the Board's decision to deemphasize the importance of the interlocutory request for review.

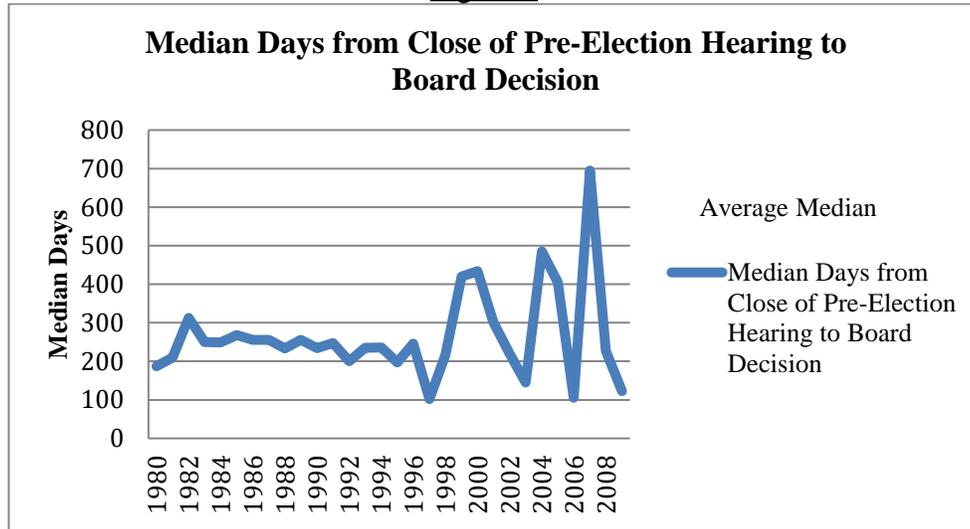
To begin, the interlocutory request for review process was responsible for the twenty-five day delay in the scheduling of elections in order to preserve parties' opportunity to file the request and for the Board to rule on it.¹⁶ The new rules eliminated that artificial cause for delay.

The old interlocutory request for review process also substantially prolonged representation proceedings. As shown on Figure 3 below, the Board's historic records demonstrate that, from 1980 to 2009, the median number of days from the close of a pre-election hearing to the issuance of a Board decision ranged between 100 and 700 days and the average over the twenty-nine year period was 257 days.

¹⁴*U.S. v. MacDonald*, 435 U.S. 850, 853 (1978) ("[I]nterlocutory or 'piecemeal' appeals are disfavored.") (quoting *Abney v. United States*, 431 U.S. 651 (1977) (citing *Di Bella v. United States*, 369 U.S. 121 (1962))); *Okl. Turnpike Auth. v. Bruner*, 259 F.3d 1236, 1241 (10th Cir., 2001) ("The historic federal policy against piecemeal appeals ... promotes judicial efficiency, expedites the ultimate termination of an action and relieves appellate courts of the need to repeatedly familiarize themselves with the facts of a case.).

¹⁵ *In re Rail Freight Fuel Surcharge Antitrust Litigation-MDL No. 1869*, 725 F.3d 244, 254 (D.C. Cir., 2013).

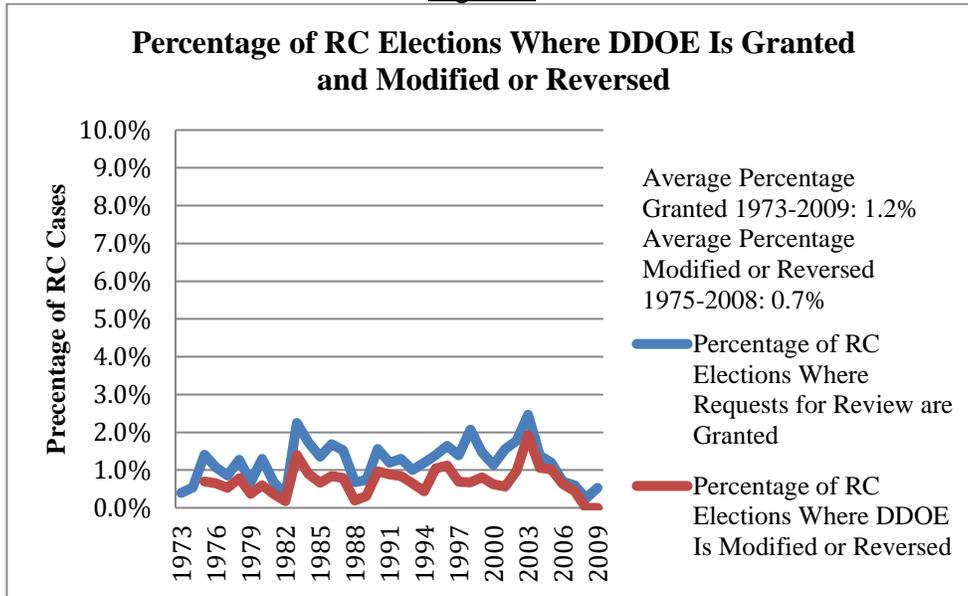
¹⁶ 29 C.F.R. § 101.21(d).

Figure 3¹⁷

The request for review process did not provide a meaningful benefit to the Board or parties in terms of improving the accuracy of decisions. As Figure 4 below shows, since 1973, the Board has granted requests for review of decisions and directions of elections in between 0.4% and 2.5% of RC cases, with the average being 1.2% over the thirty-six-year period.¹⁸ Of those cases where review was granted, the Regional Director was affirmed, on average 45% of the time, with the result that the Board interlocutory review affected the outcome in only 0.7% percent of RC cases.

¹⁷ Data for Figure 3 were compiled from Table 23 of the NLRB's Annual Reports from 1980, the first year such data were available, to 2009.

¹⁸ Similar data are shown as a different ratio in Figure 6, *infra*, which reflects that from 1975 to 2009 the Board granted requests for review 13% of the time.

Figure 4¹⁹

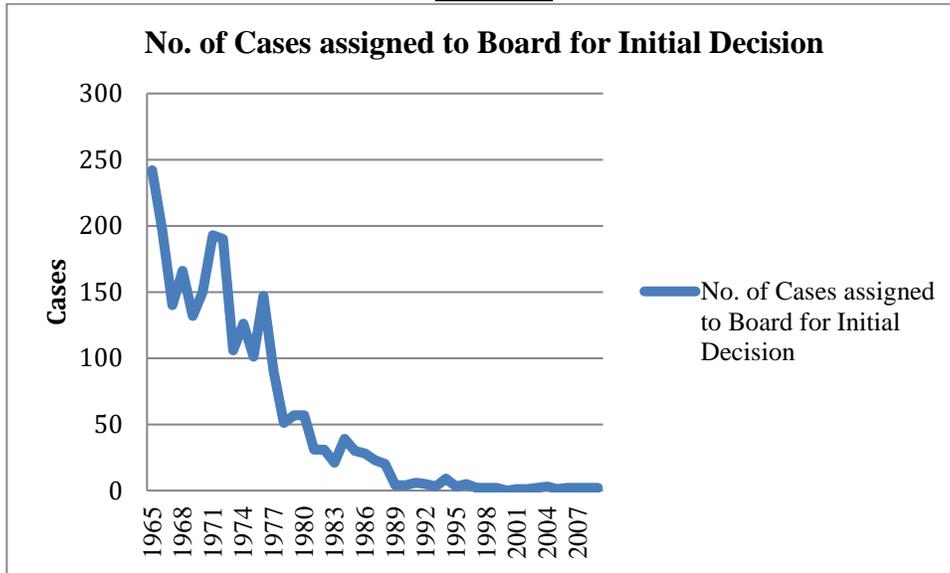
This historic record demonstrates that the Board was correct to deemphasize the interlocutory request for review. The amount of delay and expense occasioned by affording this right was not justified by adjusting the result in 0.7% of cases.

VIII. THE 2014 RULES PROPERLY ELIMINATED THE OBSOLETE PRACTICE OF ASSIGNING CASES TO THE BOARD FOR INITIAL DECISION.

The 2014 Rules appropriately eliminated the option for regional directors to assign representation cases to the Board for initial decision. As Figure 5 below demonstrates, although this procedure once enjoyed frequent use, has been obsolete and rarely used for over twenty-years since 1989.

¹⁹ Data for Figure 4 were compiled from Tables 3B and 11B of the NLRB's Annual Reports from 1973, the first year such data were available, to 2009.

FIGURE 5



Since 1989, fewer than ten assignments per year had been made. Since 1996, regional directors have not used this procedure in more than two cases per year. This lack of use by regional directors constitutes a resounding opinion from the agency's regional leaders that this process no longer is useful.

From 1997, when these records were first tracked by the Board's Annual Reports, to 2009, the average median number of days for the Board to make an initial decision when assigned a case by a regional director was 89. By comparison, over the same period, the average median number of days for a regional director to make an initial decision in a representation case was forty days. Thus, a delay in the average case of approximately 49 days had been imposed by the availability of this mostly useless procedure. The Board rightly abandoned this procedure in the 2014 Rules.

CONCLUSION

By every conceivable measure, the new rules for representation cases have been a success. Prior to the adoption of the new rules, those favoring their adoption predicted that the new rules would elevate the election to a position of central importance in representation proceedings, while largely removing the role for litigation tactics. We predicted that the New Rules would establish elections that are swifter, less costly, less litigious, and fairer.

Two years' of experience under these new rules has served only to confirm those predictions. For these reasons, it would be inexplicable for the Board to abandon these new rules now, after achieving such an overwhelmingly successful implementation.

April 17, 2018

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