No. 21-1449

IN THE

Supreme Court of the United States

GLACIER NORTHWEST, INC.,

Petitioner,

v.

INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL UNION 174,

Respondent.

On Writ of Certiorari to the Supreme Court of Washington

BRIEF OF THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS AS *AMICUS CURIAE* IN SUPPORT OF RESPONDENT

HAROLD C. BECKER
General Counsel
JAMES B. COPPESS
Counsel of Record
815 Black Lives Matter Plaza, N.W.
Washington, D.C. 20006
(202) 637-5337
jcoppess@aflcio.org

Counsel for American Federation of Labor and Congress of Industrial Organizations

December 8, 2022

Mosaic - (301) 927-3800 - Cheverly, MD

TABLE OF CONTENTS

TABLE OF AUTHORITIES

TABLE OF AUTHORITIES—Continued

Statutes

Regulations

INTEREST OF *AMICUS CURIAE*

The American Federation of Labor and Congress of Industrial Organizations is a federation of 58 national and international labor organizations with a total membership of over 12.5 million working men and women.[1] The AFL-CIO's affiliated unions in the private sector engage in collective bargaining that is regulated by the National Labor Relations Act.

The NLRA guarantees employees the right to strike in support of collective bargaining demands and assigns to the National Labor Relations Board the task of enforcing that right against employer interference. The instant case concerns when a state court may determine whether a strike was protected by the NLRA. The AFL-CIO has a vital interest in the correct resolution of this issue.

STATEMENT

Glacier Northwest, Inc., is in the business of selling and delivering concrete to customers. Teamsters Local 174 represents in collective bargaining the cement truck drivers employed by Glacier to deliver that concrete. The instant case arises out of a week-long strike by the drivers in support of their collective bargaining demands. The strike began 11 days after the expiration of the collective bargaining agreement between the parties and at least 60 days after the Union gave notice to the employer and the Federal Mediation and

---

[1] Counsel for the Petitioner and counsel for the Respondent have each consented to the filing of this *amicus* brief. No counsel for a party authored this brief in whole or in part, and no person or entity, other than the *amicus curiae*, made a monetary contribution to the preparation or submission of this brief.

Conciliation Service of the proposed termination or modification of the agreement.[2]

Following the conclusion of the strike, Glacier sued Local 174 in Washington State court alleging that the initiation of the strike constituted tortious destruction of Company property and tortious interference with customer relations and that, at the conclusion of the strike, a representative of the Union engaged in fraudulent misrepresentation. The state courts dismissed the claims regarding the initiation of the strike as preempted by the National Labor Relations Act and granted summary judgment on the misrepresentation claim. Glacier presently challenges only the dismissal of its claims for tortious destruction of property.

Glacier's tortious destruction of property claims rest on the allegation that Local 174 called the strike at a time that foreseeably caused the Company to destroy undelivered concrete. The issue of whether the strike was protected by the NLRA is presently before the National Labor Relations Board after the NLRB's General Counsel conducted a factual investigation of charges filed by Local 174, found probable cause to believe the strike was protected by federal law, and issued a complaint against Glacier. *See* Brief for the United States, App. A. The NLRB General Counsel issued her complaint shortly after the Washington Supreme Court dismissed Glacier's lawsuit.

The effect of the Washington Supreme Court's judgment is to defer to the NLRB on the question of whether the strike was protected conduct. The Court expressly stated that the "dismissal of the property

---

[2] Unions are required to provide such notice by 29 U.S.C. § 158(d)(1).

loss claims" was "without a merits determination." J.A. 170. Thus, if the pending unfair labor practice case were to result in a determination—by the Board or ultimately by a reviewing court—that the strike was not protected, Glacier would be free to reassert its tort claim in the Washington courts. *See Longshoremen v. Davis*, 476 U.S. 380, 397 (1986) ("only if the Board decides that the conduct is not protected . . . may the court entertain the litigation"); *Sears, Roebuck & Co.* v. *Carpenters*, 436 U.S. 180, 199 n.29 (1978) (no pre-emption when "the Board determines that the disputed conduct is n[ot] protected").[3] Effectively, then, the Washington Supreme Court has merely stayed state court proceedings on the tort claim until the NLRB decides whether the strike was protected.

There is no question that such a stay of proceedings would have been the proper course had the NLRB's General Counsel issued her complaint before the Washington Supreme Court's judgment. This Court has so held and the NLRB has followed that holding. *See Sears*, 436 U.S. at 202 ("when the same controversy may be presented to the state court or the NLRB, it must be presented to the Board"); *Loehmann's Plaza*, 305 NLRB 663, 670-71 (1991). The only question here is whether the Washington Supreme Court acted properly by "taking federal protected interests into consideration in determining whether [to proceed on Glacier's property destruction claim] before the Gen-

[3] If, at that time, the statute of limitations on Glacier's claims has run, Glacier may rely on the doctrine of equitable tolling. *Cf. Langlois v. BNSF Railway Co.*, 8 Wash.App.2d 845, 854-62, 441 P.2d 1244, 1249-53 (2019) (tolling statute when action originally filed in wrong court due to "the absence of legal clarity" concerning jurisdiction).

eral Counsel decide[d] whether to issue complaint." *Id.* at 670-71 n.50. That the NLRB General Counsel has now "issu[ed] a complaint alleging interference with protected activity," *id.* at 671, conclusively establishes that the Washington Supreme Court acted properly by suspending proceedings on the merits of Glacier's tort claims.

SUMMARY OF ARGUMENT

The instant case was brought in state court to recover damages for economic losses incidentally caused by a strike and by alleged, subsequent misrepresentations. The Washington Supreme Court dismissed the latter claim on the merits, and it dismissed the former claims on the grounds that they sought damages for strike activity that was arguably protected by the National Labor Relations Act. The Washington Court explained that the orderly administration of justice required that the National Labor Relations Board be allowed to rule on the protected nature of the strike in the unfair labor practice case pending before the Board on charges filed by the striking union.

The NLRA guarantees employees the right to strike in support of their collective bargaining demands. The Act contemplates that the economic losses caused by strikes will motivate unions and employers to reach agreement. Glacier argues its strike-related tort claims can proceed under an NLRB-crafted exception to the Act's protection of strikes in instances where the incidental economic harm is deemed not to be justified by the legitimate purposes of the striking union. As the Washington Court's opinion shows, there was substantial reason to believe that the strike at issue here did not come within that exception. This was subsequently confirmed by the NLRB General Counsel's issuance of a complaint

after her factual investigation that included taking sworn statements from both parties concluded that there is probable cause to believe the strike was protected by federal law.

This Court has consistently held that state courts may not sanction conduct that is protected by the NLRA. The Court has also held that it is the primary responsibility of the NLRB to determine whether particular conduct is protected by the Act. It follows, as this Court has repeatedly explained, that where an issue of NLRA protection is pending before both a court and the Board, the Board should be allowed to first decide that issue.

The effect of the Washington Supreme Court's decision is to allow the NLRB to rule on the employer-plaintiff's argument that the strike in question came within the Board's narrowly crafted exception to the NLRA's express protection of strikes. If the Board rules that the strike was protected, the employer's state law claims for incidental damages will be barred by federal law. If the Board rules that the strike was not protected, the employer will be free to reassert its tort claims in the Washington courts.

ARGUMENT

San Diego Building Trades Council v. Garmon, 359 U.S. 236, 245 (1959), established the basic rule that "[w]hen an activity is arguably subject to § 7 or § 8 of the Act, the States as well as the federal courts must defer to the exclusive competence of the National Labor Relations Board." "The primary jurisdiction rationale [of *Garmon*] unquestionably requires that when the same controversy may be presented to the state court or the NLRB, it must be presented to the Board." *Sears*, 436 U.S. at 202. Given this Court's explication

of NLRA preemption in *Sears*, the Washington Supreme Court "unquestionably" acted correctly when it left to the NLRB the initial decision of whether Local 174's strike was protected by the NLRA.

1. *Sears* begins from the proposition that "there is a constitutional objection to state-court interference with conduct actually protected by the Act." 436 U.S. at 199. State law cannot sanction conduct that federal law protects. *Brown v. Hotel Employees*, 468 U.S. 491, 502-03 (1984). That being so, when "there exist[s] a potential overlap between the controversy presented to the state court and that which the Union might [bring] before the NLRB," "the primary-jurisdiction rationale provides stronger support for pre-emption in [a] case [that] is focused upon arguably protected . . . conduct," as this case is. *Sears*, 436 U.S. at 200-01.

Sears involved a state court action to enjoin trespassory union picketing in which "there was in fact no risk of overlapping jurisdiction." *Id.* at 201. The Court explained that there was no such risk because (1) "Sears could not directly obtain a Board ruling on the question whether the Union's trespass was federally protected" and (2) "[s]uch a Board determination could have been obtained only if the Union had filed an unfair labor practice charge alleging that Sears had interfered with the Union's § 7 right to engage in peaceful picketing on Sears' property," but the union declined to file, unlike here. *Id.* Sears "gave the Union the opportunity to file such a charge" by "demanding that the Union remove its pickets from the store's property." *Id.* at 201-02. But "instead of filing a charge with the Board, the Union advised Sears that the pickets would only depart under compulsion of legal process." *Id.* at 202. "In the face of the Union's intransigence . . . [o]nly by proceeding in state court

. . . could Sears obtain an orderly resolution of the question whether the Union had a federal right to remain on its property." *Id.*

The *Sears* Court recognized that, even in a case of trespassory picketing, "it cannot be said with certainty that, if the Union had filed an unfair labor practice charge against Sears, the Board would have fixed the locus of the accommodation at the unprotected end of the spectrum," and thus "it [wa]s indeed 'arguable' that the Union's peaceful picketing, though trespassory, was protected." *Id.* at 205. Thus, "there does exist some risk that state courts will on occasion enjoin a trespass that the Board would have protected." *Id.* at 206. But the "risk is minimized by the fact that in the cases in which the argument in favor of protection is the strongest, the union is likely to invoke the Board's jurisdiction and thereby avoid the state forum," exactly as the Union did here. *Id.*

While *Sears* "strongly suggest[s] that the Union's filing of an unfair labor practice charge is sufficient in and of itself to trigger preemption," *Davis Supermarkets, Inc. v. NLRB*, 2 F.3d 1162, 1179 (D.C. Cir. 1993), the NLRB has stated that state court jurisdiction is not preempted "merely by the filing of a charge," because "[t]hat action does not require any presentation of evidence," *Loehmann's Plaza*, 305 NLRB at 670. *See Davis*, 476 U.S. at 399 ("a party asserting preemption must make an affirmative showing that the activity is arguably subject to the Act"). Here, Local 174 has done more than merely file a charge with the NLRB alleging, among other things, that the strike was protected activity and that Glacier's efforts to sanction the drivers and the Union are thus unfair labor practices. The Union presented evidence in support of those charges that convinced the NLRB Gen-

eral Counsel that there is probable cause to believe that the strike was protected.[4]

Particularly pertinent here is the Board's observation that a state court may "tak[e] federally protected interests into consideration in determining [how to proceed on a state law claim] before the General Counsel decides whether to issue complaint." *Loehmann's Plaza*, 305 NLRB at 670 n.50. The Washington Supreme Court properly took the federally protected interests into account in deciding to permit the NLRB to proceed first here.

Unlike in *Sears*, Local 174 filed a charge with the NLRB based on Glacier's discipline of striking drivers before Glacier filed its action in state court. Brief for the United States, App. A ¶ 1. The record does not fully disclose the reasons why the Board General

---

[4] Regulations governing the General Counsel's processing of unfair labor practice charges provide:

> The Regional Director requests the person filing the charge to submit promptly evidence in its support. As part of the investigation hereinafter mentioned, the person against whom the charge is filed, hereinafter called the respondent, is asked to submit a statement of position in respect to the allegations. The case is assigned for investigation to a member of the field staff, who interviews representatives of the parties and other persons who have knowledge as to the charge, as is deemed necessary.

29 C.F.R. § 101.4.

Only if that investigation reveals that "a charge has merit," may the regional director issue a complaint. 29 C.F.R. § 101.8. Thus, Glacier's disparaging reference to "[t]he unreasonable legal assertions of a regional director," Petitioner Br. at 36, fails to recognize that the NLRB's Regional Director, the agent of the General Counsel, based the allegation in her complaint on a factual investigation that considered, among other evidence, Glacier's position statement and three declarations submitted by Glacier. J.A. 63-84.

Counsel did not issue a complaint until shortly after the Washington Supreme Court's decision. But the General Counsel's action appears to have resulted from a unique combination of circumstances, including the parties' successful negotiation of a successor collective-bargaining agreement and the General Counsel's subsequent deferral of the discipline charge to the contractual arbitration process as well as the addition of an unfair labor practice charge related to the state court lawsuit. In the last regard, the Union's charge alleged, with regard to the company's misrepresentation claim, that the lawsuit was "objectively baseless" and retaliatory. J.A. 64. A complaint could not issue on that aspect of the case, unlike the preempted aspects still at issue here, until the Washington courts finally decided the merits of the misrepresentation claim. *Compare Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731, 744-46 (1983) *with id.* at 737 n.5. In any case, as the Washington Supreme Court explained, J.A. 169 n.10, the NLRB's General Counsel's delay in issuing a complaint in no way suggested that the strike was not protected. In these circumstances, the Washington Supreme Court correctly concluded that it would not "serve[] the orderly administration of justice" for the state courts to continue "to exercise jurisdiction over a case involving arguably protected conduct" when a charge alleging the conduct was, in fact, protected was pending before the NLRB's General Counsel.

After the Washington Supreme Court dismissed all of Glacier's tort claims, the NLRB General Counsel issued a complaint pursuant to Local 174's unfair labor practice charges presenting the question of whether the strike was actually protected by the Act to the NLRB. As a result, the mere "risk of overlapping jurisdiction," noted in *Sears*, became a reality in this

case. 436 U.S. at 201. There is no question, in such circumstances, that it is the Board that should decide whether the Act protects the Union's strike. Not only is it the body charged with interpreting and applying the NLRA, but it is the only forum that has jurisdiction over all of the relevant parties. This is so not only because the NLRB is not a party to the state court action, but because the state courts cannot interfere with the NLRB General Counsel's prosecution of her "formal allegation of law violation in the name of the United States." *Loehmann's Plaza*, 305 NLRB at 670.

This Court has made clear that:

> The need for protecting the exclusivity of NLRB jurisdiction is obviously greatest when the precise issue brought before a court is in the process of litigation through procedures originating in the Board. While the Board's decision is not the last word, it must assuredly be the first. In addition, when the Board has actually undertaken to decide an issue, relitigation in a state court creates more than theoretical danger of actual conflict between state and federal regulation of the same controversy.

Marine Engineers v. Interlake S.S. Co., 370 U.S. 173, 185 (1962).

2. An additional reason for allowing the NLRB to make the initial decision on NLRA protection is that this case involves a peaceful strike in support of legitimate collective bargaining demands. That is activity at the core of what the NLRA protects.

Sears held that the absence of overlapping NLRB proceedings "does not . . . necessarily foreclose the possibility that pre-emption may be appropriate." 436 U.S. at 203. "To allow the exercise of state jurisdiction in [such] contexts might create a significant risk of

misinterpretation of federal law." *Id.* Whether it is "reasonable to infer that Congress preferred the costs inherent in a jurisdictional hiatus" caused by pre-empting state court jurisdiction "to the frustration of national labor policy" where no NLRB case is pending, depends on "the strength of the argument that § 7 does in fact protect the disputed conduct." *Id.* In this respect, as well, the instant case presents the polar opposite of the situation faced in *Sears*.

In *Sears*, the question was whether the union's "violations of state trespass laws [were] actually protected by § 7 of the federal Act." 436 U.S. at 204. While it was "'arguable' that the Union's peaceful picketing, though trespassory, was protected," the Court concluded that "permitting state courts to evaluate the merits of an argument that certain trespassory activity is protected does not create an unacceptable risk of interference with conduct which the Board . . . would find protected." *Id.* at 205. This conclusion rested squarely on the Court's observation that "while there are unquestionably examples of trespassory union activity in which the question whether it is protected is fairly debatable, experience under the Act teaches that such situations are rare and that a trespass is far more likely to unprotected than protected." *Id.*[5]

In contrast, the union activity for which Glacier seeks recovery in state court was a peaceful strike in support of collective bargaining demands. Such activity is at the heart of the concerted activities protected by the NLRA.

---

[5] *Sears* also involved an ongoing trespass and a prayer for injunctive relief in the state court action—facts that increased the "costs inherent in a jurisdictional hiatus"—while here the strike is over and Glacier seeks only damages in the state court action. 436 U.S. at 203.

Section 7 grants employees the right to "engage in . . . concerted activities for the purpose of collectively bargaining." 29 U.S.C. § 157. And another section expressly preserves "the right to strike." 29 U.S.C. § 163. This Court has made emphatically clear that "[t]he presence of economic weapons in reserve, and their actual exercise on occasion by the parties, is part and parcel of the system that the [NLRA] ha[s] recognized." *NLRB v. Insurance Agents*, 361 U.S. 477, 489 (1960). "[T]he use of economic weapons[] frequently ha[s] the most serious effect upon individual workers and productive enterprises." *Id.* Nevertheless, "our national labor relations policy" contemplates "the availability of economic pressure devices to each to make the other party incline to agree on one's terms." *Id.*

Glacier maintains that Local 174's strike was unprotected because it began during the workday with the predictable effect of wasting a small amount of undelivered concrete. The NLRB has squarely held to the contrary: "[t]he fact that [a] strike occurred during the workday when [some products] were . . . vulnerable to loss does not mean employees automatically los[e] protection under the Act." *Lumbee Farms*, 285 NLRB 497, 506 (1987). *See also* Brief of Amicus United States at 12-13 (citing cases). "Economic loss . . . is often a byproduct of labor disputes, and . . . the exercise of Section 7 rights by employees in pursuit of legitimate aims does not depend on whether they protect their employer against consequential loss." *Leprino Cheese Co.*, 170 NLRB 601, 606-07 (1968). Moreover, offsetting Local 174's ability to call the drivers out on strike at a time of its choosing was Glacier's option to use "the lockout" which "allows the employer to pre-empt the possibility of a strike" and thus fully control the timing of the cessation of work. *American Ship Building Co. v. NLRB*, 380 U.S. 300, 309-10 (1965).

Concerted activities are unprotected if they are deemed to be "indefensible." *NLRB v. Washington Aluminum Co.*, 370 U.S. 9, 17 (1962). But the mere fact that an employer suffers economic loss, including product spoilage, as a consequence of a strike does not render that activity unprotected. "The Board has held concerted activity indefensible where employees fail to take reasonable precautions to protect the employer's plant, equipment, or products from foreseeable imminent danger due to sudden cessation of work." *Bethany Medical Center*, 328 NLRB 1094, 1094 (1999). To determine what is "reasonable" in this regard, the extent to which the employer "sustained some loss of its product . . . separate from labor losses resulting from the strike" must "be weighed against . . . the strikers' legitimate concerns." *Lumbee Farms* , 285 NLRB at 506. It is only when "the economic pressure brought to bear . . . reach[es] a degree so grossly disproportionate to the goal sought to be achieved that it renders the conduct unprotected." *NLRB v. A. Lasaponara & Sons, Inc.*, 541 F.2d 992, 998 (2d Cir. 1976).

Evidence presented to both the NLRB General Counsel and to the Washington trial court, shows that the strikers did take reasonable steps to protect Glacier's property from unnecessary damage. JA 71-85. The strike did not come as a surprise to Glacier. It was an economic strike closely following the expiration of the parties' collective bargaining agreement and the Union had given the required 60-days notice of its intention to terminate or modify the agreement. The strikers returned the loaded trucks to the Company's yard and left them running so that the trucks could be safely unloaded. Indeed, by leaving the trucks running, the strikers gave Glacier the opportunity to deliver the concrete, if the Company had arranged for sufficient managerial and supervisory per-

sonnel or replacement drivers to be available.[6] Had the strikers not returned the trucks to Glacier's yard and not left them running, Glacier contends that the concrete might have begun to harden within 20 to 30 minutes, destroying the undelivered concrete and damaging the trucks. J.A. 8. In contrast, *see Rockford Redi-Mix, Inc. v. Teamsters Local 325*, 195 Ill. App.3d 294, 551 N.E.2d 1333, 1335-36 (1990) (striking cement truck drivers parked "their trucks away from the [employer's] premises" and "decided to leave the trucks with the ignitions off, drums stopped, with the keys in the ignition").

It is difficult to imagine what further steps the Union could have taken to protect Glacier without giving advance notice of the precise day and time that the strike would commence. On the day of the strike, drivers were scheduled to begin work at staggered start times running from 2 a.m. to 7 a.m., setting off to make deliveries as their trucks were loaded. JA 76 ¶ 4. Given the staggered start times and the repeated concrete deliveries throughout the day, beginning the strike at a different time would not have avoided the wasting of a similar amount of concrete. Even if the strike had been called at 2 a.m., there is no reason to think that fewer than 16 trucks would have been loaded with concrete at the beginning of the work stoppage.

Since concrete must be prepared before it can be loaded into trucks, some concrete would necessarily have to be prepared before drivers began arriving for work. In order to avoid any loss of materials, the

---

[6] Glacier has approximately 215 employees in the State of Washington, including 80-90 drivers in the Seattle area. J.A. 71-72. In addition, employers are privileged to hire permanent or temporary replacements for employees engaged in an economic strike.

Union would have had to warn Glacier sufficiently in advance of 2 a.m. to allow the Company to prepare for the strike by either not mixing concrete for delivery that day, thus effectively locking out the drivers, or by arranging for additional managers, supervisors, drivers or striker replacements to be available. Congress required no such notice.

The NLRA requires advance notice of strikes or picketing only at certain healthcare facilities. 29 U.S.C. § 158(g). In other contexts, the Board has accordingly held that "the absence of advance notice of the concerted action" does not "remove the protection of the Act." *Johnnie Johnson Tire Co.*, 271 NLRB 293, 295 (1984). Thus, the Union's failure to give Glacier advance notice of its plans does not render the strike unprotected *per se*.

The Washington Supreme Court's determination that the strike was arguably protected by the NLRA was confirmed by the NLRB General Counsel's decision to issue a complaint. "In issuing a complaint alleging interference with protected activity, the General Counsel has made the determination that unprotected activity . . . is not present." *Loehmann's Plaza*, 305 NLRB at 671. To finally determine whether the strikers had taken "reasonable precautions," *Bethany Medical Center*, 328 NLRB at 1094, Glacier's avoidable loss of a small amount of concrete must "be weighed against . . . the strikers' legitimate concerns," *Lumbee Farms*, 285 NLRB at 506. "Prior to granting any relief from the Union's [strike], the state court w[ould be] obligated to decide that the [strike] was not actually protected by federal law." *Sears*, 436 U.S. at 201. As the Washington Supreme Court recognized, "[t]o fully analyze whether the conduct is unprotected under section 7 in this case, [the Court] would need to

engage with the facts as a matter of first impression, balancing the economic pressure against the strikers' legitimate interest." J.A. 165. "*Garmon* makes clear that this kind of fact-specific determination is a function of the Board in the interest of the uniform development of labor policy." J.A.165.

This Court has long recognized that, by enacting the National Labor Relations Act, "Congress did not merely lay down a substantive rule of law to be enforced by any tribunal competent to apply law generally to the parties. It went on to confide primary interpretation and application of its rules to a specific and specially constituted tribunal and prescribed a particular procedure for investigation, complaint and notice, and hearing and decision, including judicial relief pending a final administrative order." *Garner v. Teamsters*, 346 U.S. 485, 490 (1953). Thus, when it comes to interpreting the provisions of the Act, "[t]he power and duty of primary decision lies with the Board, not with [the courts]." *Id.* at 489.

* * *

In the instant case, "there is a strong argument that the [strike] is protected" by the NLRA. *Sears*, 436 U.S. at 207. This is demonstrated "by the filing [of] an unfair labor practice charge" and the General Counsel's issuance of a complaint upon her investigation of the charge. *Id.* As a result, "the protection question w[ill] be decided by the agency experienced in accommodating the § 7 rights of unions and the property rights of employers in the context of a labor dispute." *Id.* The Washington Supreme Court correctly refrained from addressing that question in this case while the NLRB proceeds to decide whether the strike was protected by the Act. To have done otherwise and allow a "multiplicity of tribunals" to decide whether

the strike was protected by the NLRA would risk "conflicting adjudications." *Garner*, 346 U.S. at 490-91.

CONCLUSION

The judgment of Washington Supreme Court should be affirmed.

Respectfully submitted,

Harold C. Becker
General Counsel
James B. Coppess
Counsel of Record
815 Black Lives Matter Plaza, N.W.
Washington, D.C. 20006
(202) 637-5337
jcoppess@aflcio.org