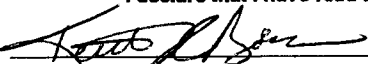


UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original and 4 copies of this charge 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 CNN News Network		b. Number of Workers Employed Approx. 85
c. Address (street, city, State, ZIP, Code) 820 1st Street, N.E. Washington, D.C. 20002		d. Employer Representative David Bohrman
		e. Telephone No. (202) 898-7000 Fax No. (202) 898-7565
f. Type of Establishment (factory, mine, wholesaler, etc.) Cable News Network		g. Identify Principal Product or Service Recording, Editing and Broadcasting of Cable News
h. 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) (3), (5) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.		
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices.)		
<p>(1) The above-named Respondent, CNN News Network ("CNN"), is a joint employer with a subcontractor, Team Video Services ("TVS"), of an appropriate bargaining unit employed at CNN's Washington, D.C. facility. NABET-CWA Local 31 ("Union") represented employees in that bargaining unit pursuant to a collective bargaining agreement between the Union and TVS.</p> <p>(A) During the past six months, CNN has failed or refused to recognize the Union as the collective bargaining representative of the bargaining unit of employees at the Washington, D.C. facility in violation of Section 8(a)(5) of the Act.</p> <p>(B) During the past six months, CNN has failed or refused to bargain with the Union over the termination of the subcontract with TVS, the layoff of the bargaining unit employees, the transfer of work covered by the collective bargaining agreement to CNN, the hire or rehire of employees, and the effects of these decisions, all of which violates Section 8(a)(5) of the Act.</p> <p>(C) During the past six months, CNN has made unilateral changes to terms and conditions of employment of employees in the bargaining unit without providing NABET-CWA Local 31 with prior notice and a reasonable opportunity to bargain, all of which violates Section 8(a)(5) of the Act.</p> <p>(2) During the past six months, CNN, by and through its agents, officers and representatives, refuses to recognize that it is a successor employer. CNN has refused, and continues to refuse, to recognize and bargain with NABET-CWA Local 31 as the collective bargaining representative of an appropriate bargaining unit employed at the CNN Washington, D.C. facility in violation of Section 8(a)(5) of the Act.</p> <p>(3) During the past six months, CNN, by and through its agents, officers and representatives, has refused to hire employees represented by NABET-CWA Local 31 in an effort to avoid its obligations as a successor employer in violation of Section 8(a)(3) of the Act.</p> <p>(4) During the past six months, CNN, by and through its agents, officers and representatives, has refused to hire union activists supporting NABET-CWA Local 31 in an effort to avoid its obligations as a successor employer in violation of Section 8(a)(3) of the Act.</p>		
By the above and other acts, the above-named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.		
3. Full name of party filing charge (if labor organization, give full name, including local name and number) NABET-CWA Local 31		
4a. Address (street and number, city, State, and ZIP Code) 962 Wayne, Suite 400 Silver Spring, MD 20910		4b. Telephone No. (301) 495-4999 Fax No. (301) 495-4975
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) National Association of Broadcast Employees & Technicians, Communications Workers of America, AFL-CIO		
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.		
By  Keith R. Bolek (Signature of representative or person making charge) O Donoghue & O Donoghue		Attorney _____ (Title, if any)
Address 4748 Wisconsin Avenue, N.W. Washington, D.C. 20016		Fax No. 202/237-1200 202/362-0041 (Telephone No.)
		Date 2/3/04