

1. The UAW, for more than a year and one-half, solicited VW employees' signatures on "authorization cards" in an effort to deliberately and covertly avoid a secret ballot election. On or about September 12, 2013, the UAW demanded VW management's voluntary recognition as the exclusive representative of VW's Chattanooga workforce for the purposes of collective bargaining.
2. The UAW solicited, enticed, and/or demanded VW employees' signatures by unlawful means including misrepresentations, coercion, threats, and promises.
3. The UAW restrained and coerced employees seeking to revoke their authorization cards by telling them that they had to physically appear at the union office if they wanted their cards returned.
4. The UAW's use of cards, signed more than a year and one-half ago, to circumvent a secret ballot election by soliciting VW's voluntary recognition is unlawful. *Surpass Leather Company*, 21 NLRB 1258, 1273 (1940); *Luckenbach Steamship Co.*, 12 NLRB 1330, 1343-1344 (1939).
5. The UAW's misrepresentations to employees regarding the purpose for signing cards and soliciting VW employees' signatures by coercion, threats, and promises are unlawful. *Comcast Cablevision-Taylor v. NLRB*, 232 F.3d 490 (6th Cir. 2000); *Levi Strauss & Co.*, 172 NLRB 732, 733 (1968).
6. The UAW's actions and omissions, as described above, restrain and coerce the Charging Party and all other similarly situated VW employees in the exercise of their § 7 rights to refrain from collective activity.