

STATE OF CONNECTICUT  
LABOR DEPARTMENT  
CONNECTICUT STATE BOARD OF LABOR RELATIONS

In the matter of  
City of New London

(Respondent)

-and-

New London Police Union Local #724  
Council #15, AFSCME, AFL-CIO

(Complainant)

CITY OF NEW LONDON, CT  
CITY CLERK

2012 MAR 14 A 9 16

NATHAN R. CARON

Respondent's Address: New London City Hall, 181 State Street, New London, CT 06320  
Respondent's Phone: 860-447-5201

**COMPLAINT**

Pursuant to Section 7-471(5) of the Municipal Employee Relations Act the undersigned alleges that the above-named Respondent has engaged in and is engaging in prohibited practices within the meaning of Section 7-470 of said Act, in that: (Please provide a clear and concise description of the acts which are claimed to constitute prohibited practice including an enumeration of the subdivisions of Section 7-470 claimed to have been violated and a statement of the relief to which the complainant deems himself entitled. Failure to provide such specificity may result in the complaint being returned without investigation.)

1. The City of New London ( the "City") is a Municipal Employer within the meaning of the Act;
2. New London Police Union Local 724, Council 15, AFSCME, (the "Union") is an Employee Organization within the meaning of the Act;
3. At all times material, the parties were subject to a Collective Bargaining Agreement;
4. That for at least the past 24 months, the City of New London, former City Manager Denise Rose and current Mayor Daryl Fininzo have fostered a working environment that has allowed Chief Of Police Margret Ackley to engineer an environment of Anti-Union animus and allow habitual other violations of the act in the following manner:
  - a. Ackley has targeted members of the Union Executive Board by divulging confidential information to members of the public for the specific purpose of undermining the Police Union and harassing union executive board members.
  - b. Prior to the union ratification vote on the TA for the 2011-2013 collective bargaining agreement, Ackley violated the negotiating ground rules, bargained in bad faith and acted with anti union animus when she told Det Rick Cucuro that the Union "screwed the detectives and could have gotten a better deal for the detectives";

- c. Ackley privately asked citizens to put pressure on the City Council to put pressure on the union to support the chief or risk having the tentative agreement between the city and the union rejected.
  - d. In an email to a citizen dated (July 28, 2011). Ackley infers that VP Lynch is involved in appropriate behavior by referring to him as being part of a "Lynch Mob";
  - e. On August 15, 2011 Ackley undermines VP Lynch by sharing with a citizen information about VP Lynch's personal life and his family life;
  - f. On August 10, 2011, Ackley makes Anti-Union Animus comments to a citizen and interferes with Union's rights to expression.
  - g. On or about August 11, 2011, Ackley instructs a citizen to FOI all citizen complaints and Law suits involving VP Lynch.
  - h. On or about August 11, 2011, Ackley instructs a citizen to FOI all citizen complaints against Union board members, Charles Flynn, Neil Rodgers and Roger Baker.
  - i. On or about August 11, 2011, Ackley instructs a citizen to FOI Lynchs' Connecticut State Police personnel files stating that Lynch had problems while a Resident Trooper at East Lyme and Ledyard.
  - j. On or about August 19, 2011, Ackley suggests it is "time to 'throw another Bomb." at VP Lynch.
  - k. On or about September 7, 2011, a citizen and Ackley appear to have possibly conspired to circumvent FOIA to obtain employment records and investigations of Executive Board members.
  - l. On or about September 13, 2011, Ackley threatens to a citizen that if Buscetto wins the Union will continue to do what they are doing. If Buscetto loses, I will go public and let them all have it.
  - m. On or about September 13, 2011 Ackley criticizes VP Lynch's activities at a union meeting.
  - n. In August of 2011, Ackley made accusations that the Union was colliding with other non union members of management.
5. That; The City of New London through Chief Ackley's actions has acted with anti union animus, has bad faith bargained, has harassed members of the executive board and their families, has acted with such disregard for the law that the contract has been repudiated.

**REMEDY**

1. Cease and Desist Order
2. Attorney Fees
3. Any Other Remedy The Board Sees Fit.

Subscribed and sworn to before me

This 9<sup>th</sup> day of MARCH, 2012

Marcel D. Karolis

Notary Public Comm. Exp. 9/30/2015

**New London Police Union Local #724  
Council #15, AFSCME, AFL-CIO**  
(Complainant)



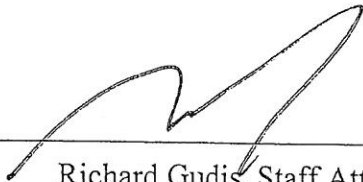
Signature

**Richard Gudis, Esq.  
Council #15, AFSCME, AFL-CIO  
700 West Johnson Avenue, Suite 305  
Cheshire, CT 06410  
203-250-2220**

**CERTIFICATION OF SERVICE**

I hereby certify that, pursuant to Section 7-471-20 of the Connecticut General Regulations, a copy of the foregoing was mailed to the Respondent by certified mail.

Certified Mail No. 7010 2780 0002 2151 4439

  
Richard Gudis, Staff Attorney