

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

| DO NOT WRITE IN THIS SPACE | |
|----------------------------|-----------------------|
| Case 4-CB-9492 | Date Filed 6-16-05 |

INSTRUCTIONS: File an original and 4 copies of this charge and an additional copy for each organization, each local, and each individual named in Item 1 with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT

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| a. Name Service Employees International Union, District 1199P, AFL-CIO, CLC | | b. Union Representative to contact Dena Adams |
| c. Telephone No. 215-604-5896 | d. Address (street, city, state and ZIP code) 2064 State Road, #106, Bensalem, PA 19020 | |

e. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) (IXA) 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)

On or about April 22, 2005 to the present, the union violated employees' rights under Section 7 of the National Labor Relations Act by:

- Harassing and intimidating employees at their homes to secure signatures on purported union authorization cards;
- Misrepresenting to employees the meaning of union authorization cards in an attempt to have employees sign union authorization cards;
- Misrepresenting to employees at their homes that the union represented Total Health Home Care and that the union authorization cards were paperwork the Employer authorized the employees to sign;
- Threatening employees using racial intimidation, stating in public that Total Health Home Care is white, the employees are black, and if they they did not join the union they were black and stupid;
- Threatening employees that if they did not sign union authorization cards, the union would use their social security numbers as signatures;
- Preventing employees at their homes from going to work until they signed a union authorization card;
- Making employees sign a union authorization card as an entry fee into a union-sponsored organizing event;
- Asking whomever answered the door at the employees' homes to sign a union authorization card on behalf of the employee;
- Taxing employees to regional transportation terminals in return for signing a union authorization card.

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| 3. Name of Employer Total Health Home Care Corp. | | 4. Telephone No. 610-853-1402 |
| 5. Location of plant involved (street, city, state and ZIP code) 2710 Township Line Road, Havertown, PA 19083 | | 6. Employer representative to contact Michael J. Wietzychowski, Esq. 856-492-5723 |
| 7. Type of establishment (factory, mine, wholesaler, etc.) Home health care | 8. Identify principal product or service Health care related services | 9. Number of workers employed Approx. 440 |
| 10. Full name of party filing charge Total Health Home Care Corp. | | |
| 11. Address of party filing charge (street, city, state and ZIP code) 2710 Township Line Road, Havertown, PA 19083 | | 12. Telephone No. 610-853-1402 |

13. DECLARATION

I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.

By: Michael J. Wietzychowski
(signature of representative of person making charge)
Address: 2710 W. TOWNSHIP LINE RD
HAVERTOWN PA 19083
6108531402
(Telephone No.)
VP Director Human Resources
(title or office, if any)
6-9-05
(date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U. S. CODE, TITLE 18, SECTION 1001)