



American Federation of Government Employees  
National Council of HUD Locals 222

*Affiliated with AFL-CIO*

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March 14, 2022

MEMORANDUM FOR: Sonya Gaither, Director, Employee and Labor Relations Division

James M. Fox, Chief, Employee and Labor Relations Headquarters  
Branch

Shearan Alston, Human Resources Specialist, Employee and Labor  
Relations Headquarters Branch

FROM:

Jerry Gross, Midterm Bargaining Committee Co-Chair, AFGE Council  
222

SUBJECT:

Addition to Grievance of the Parties/Unfair Labor Practice Charge and  
Demand to Bargain: OGC New Financial Disclosure Requirement

On February 17, 2022, AFGE Council 222 (the Union) filed an Unfair Labor Practice grievance of the parties, a request for information pursuant to 5 U.S.C. § 7114(b)(4), and a demand to bargain with preliminary proposals related to the Office of General Counsel's recent imposition of new financial disclosure requirements. You have not responded to the Union's demand that you cease and desist from imposing the new requirement that bargaining unit employees submit financial disclosure statements until you provide the Union with proper notice of a change in conditions of employment and the parties complete any bargaining required. Furthermore, the Union has learned that management has failed to respond to employees' requests for extensions or granted only the most minimal extensions in several cases.

Consequently, due to the Agency's lack of responsiveness, the Union is amending our ULP-GOP by adding the following remedy:

6. Management shall rescind and expunge any disciplinary/adverse actions taken against any OGC attorney who did not timely file the financial disclosure forms due to the agency's implementation prior to completion of midterm bargaining.

The Union also amends our Demand to Bargain by adding the following proposal:

9. Management shall take no disciplinary/adverse actions against any OGC attorney who did not timely file the financial disclosure forms due to the agency's implementation prior to completion of midterm bargaining and shall rescind and expunge any such actions already taken.

The Union reserves the right to amend or add proposals, in accordance with Article 49 of the collective bargaining agreement.

Grievance of the Parties/Unfair Labor Practice Charge,  
Request for Information Pursuant to 5 U.S.C. § 7114(b)(4),  
and Demand to Bargain: OGC New Financial Disclosure Requirement

I continue to await your responses to the Union's grievance of the parties/unfair labor practice charge, request for information, and demand to bargain. Please send all responses to [jerry.gross@hud.gov](mailto:jerry.gross@hud.gov) and [ricardo.miranda@hud.gov](mailto:ricardo.miranda@hud.gov).

cc: Amy Brown, Deputy General Counsel for Housing Programs, Office of General Counsel  
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