

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 18**

**PRINTPRO, INC. D/B/A SEVEN CORNERS  
PRINT & PROMO**

**Employer**

**and**

**INTERNATIONAL UNION OF PAINTERS AND  
ALLIED TRADES, LOCAL 880 SIGN AND  
DISPLAY**

**Petitioner**

**Case 18-RC-362022**

**DECISION AND DIRECTION OF ELECTION**

The Petitioner seeks to represent a unit of all full-time and regular part-time employees who perform screen-printing on fabric at the Employer's Minneapolis, Minnesota facility.<sup>1</sup>

The primary issue in this case is whether the Employer's screen-printing manager is a supervisor as defined by the Act and is therefore excluded from the bargaining unit the Petitioner seeks to represent. If the screen-printing manager is a Section 2(11) supervisor, this implicates a second issue, whether the unit is a stable, one-person unit, as historically there have been only two employees working year-round in the unit: the screen-printing manager and a screen-printing operator. The Employer contends the screen-printing manager position, held by Will Cushman, is a 2(11) supervisory position, while the Petitioner asserts that it is not. Based upon the record and the relevant Board cases, I find, as explained in this decision, the Employer has not met its burden of proof regarding the 2(11) supervisory status of the screen-printing manager position. As such, I conclude that Will Cushman is not a statutory supervisor and is eligible to vote. Further, since the screen-printing manager is a statutory employee, the potential second issue is not implicated. Accordingly, I shall direct an election in the unit sought by the Petitioner.

Under Section 3(b) of the Act, I have the authority to hear and decide this matter on behalf of the National Labor Relations Board. Based on the record in this proceeding, I find:

1. The hearing officer's rulings made at the hearing are free from prejudicial error and are hereby affirmed.

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<sup>1</sup> As noted in the stipulation in Board Exhibit 2, the employees were scheduled to work at the Employer's 1099 Snelling Avenue, St. Paul, Minnesota facility until May 21, 2025, at which time the Employer was scheduled to relocate its operations to its 1820 Elm Street SE, Minneapolis, Minnesota facility.

2. The Employer is engaged in commerce within the meaning of the Act and it would effectuate the purposes of the Act to assert jurisdiction herein.<sup>2</sup>
3. Petitioner is a labor organization within the meaning of Section 2(5) of the Act.
4. A question affecting commerce exists concerning the representation of certain employees of the Employer within the meaning of Section 9(c)(1) and Section 2(6) and (7) of the Act.
5. There is no collective-bargaining agreement in effect covering any of the individuals in the petitioned-for unit and, therefore, no contract exists barring consideration of the instant petition.
6. The parties have stipulated that the following employees of the Employer constitute a unit appropriate for the purposes of collective bargaining within the meaning of Section 9(b) of the Act:

All full-time and regular part-time employees who perform screen printing on fabric employed by the Employer at its Minneapolis, Minnesota facility; excluding all other employees, office clericals, managerial employees, and guards and supervisors as defined by the National Labor Relations Act.

## **I. RECORD EVIDENCE**

### **A. Background**

The Employer is an Iowa based printing company. Sometime around September 2024, it acquired Seven Corners Print & Promo, a Minneapolis-St. Paul, Minnesota based printing and promotional company, employing the employees the Petitioner seeks to represent. Most of Seven Corners Print & Promo's work consists of commercial print jobs, signage, and promotional mailings, with a smaller portion—about seven percent—coming from the petitioned-for screen printing work.

The history of Seven Corners Print & Promo screen-printing business begins around 2012. Dan Winter, who owned the company before the current Employer and who is still involved in managing the business, oversaw the newly acquired screen-printing operations directly. From about 2016 onward, there were two individuals working in the screen-printing department year-round, a screen-printing manager and a screen-printing operator. In 2019, the screen-printing operator at that time, Shamus Barrett, became the manager, and a new employee, Noah Johnson, was hired to be the operator. Johnson continued in that role until he was laid off

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<sup>2</sup> The parties stipulated that the Employer, an Iowa corporation with an office and place of business located in Minneapolis, Minnesota, is engaged in the commercial printing business. During the 12-month period ending May 19, 2025, a representative period, the Employer in the course and conduct of its business operations sold and shipped goods valued in excess of \$50,000 directly to points located outside the State of Minnesota.

just before the hearing in this matter. In 2023, Barrett announced his resignation, and in September 2023, Will Cushman was hired to replace him as the manager.

After the current Employer acquired Seven Corners Print & Promo around September 2024, Dan Winter remained on as a partner in the new business and holds the title of Operations Manager. At that time, Winter continued to directly oversee the screen-printing department until February 2025, when Kelly Duclos was promoted to oversee all the Minnesota operations, including the screen-printing department. Cushman has reported to Duclos since this time. Winter continues to assist and oversee Duclos, whose title is General Manager, but Duclos also has a direct reporting relationship to the new partners in Iowa.

The screen-printing department performs the Employer's fabric printing, including T-shirts and tote bags. Historically the department has a particularly busy time during the summers, primarily due to work generated by the Minnesota State Fair, and during this time has seasonally brought on one to two additional employees.

Cushman was hired without previous managerial experience and received management training briefly from Barrett before he left and then from Winter. As will be discussed further below, Cushman, inter alia, receives the printing orders for the department, prepares quotes, prepares orders with specifications needed for the printed product, interacts with customers when needed, and orders necessary supplies.<sup>3</sup> Historically,<sup>4</sup> he has spent most of his time doing this type of sales/administrative work; he estimated that he spent approximately five hours a week in an average 40-hour week performing actual screen-printing operator work. Operator Noah Johnson spends 100% of his time operating the presses. Cushman has a desk with a computer on the department shop floor next to the dryer where the shirts are cured after printing where he performs his sales/administrative work.

## **B. Seasonal Screen-Printing Production Personnel During Will Cushman's Tenure (Hire)**

At the outset, it should be noted that Operations Manager Winter testified that no managers at the company, including himself, can hire employees without getting approval from the partners in Iowa. However, beyond this testimony, there are no additional details in the record concerning how this approval process works.

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<sup>3</sup> Cushman purchases fabrics for customer orders on a company issued American Express card. In addition to ordering fabrics, Cushman is authorized to spend up to \$500 without notifying General Manager Duclos, on any other supplies needed for the department, such as machine parts, safety equipment, and cleaning chemicals.

<sup>4</sup> A couple weeks before the Hearing, the Employer laid off the screen-printing operator Johnson. Since that time, Cushman has been performing both his duties as the manager and the operator's duties. However, a large portion of the work, particularly work where the customer is seeking a "union made" label, has been transferred to the Employer's Iowa facility where the screen-printing employees are represented by a union. About 50% of Cushman's current duties involve sending order information to Iowa.

*September 2023*

Cushman testified that at the time he was hired in September 2023, a temporary employee named Ryan (last name unknown) was already working in the screen-printing department. Ryan was referred to the Employer by his spouse who was an employee of the Employer in another department. Winter testified, however, that Cushman hired Ryan, and that Cushman made the decision to bring Ryan on board. Winter also testified that in the context of the decision to hire him, Cushman talked to him and then trained him. No documentary evidence was entered to clarify this conflict in testimony concerning when and how Ryan was hired.

About three or four weeks after Cushman was hired, Winter instructed Cushman to tell Ryan that he was being let go. Before Ryan left, he made it clear to Cushman that he wanted to come back and work whenever the need arose.

*Summer 2024*

When the summer of 2024 approached, Cushman went to Winter and inquired about bringing on more people in the department in anticipation of the increased workload with the busy Minnesota State Fair season. Winter told Cushman that he would do some “leg work.” Winter then contacted former screen-printing manager Shamus Barrett who provided, Winter thinks, three candidates. Only one of these three was provided to Cushman to interview—Robert Mechura. It is unclear the extent of Winter’s conversation with Barrett or the pre-screen involved in selecting this single candidate provided to Cushman for interviewing.<sup>5</sup>

Winter testified that Cushman met with Mechura “to make sure he had the skills” and that after the meeting, Cushman thought Mechura had the skill sets to do what needed to be done. In this regard, Winter testified that he is not a screen-printing person and that is why he has had someone else manage it. Winter stated that he did not meet Mechura until after he was hired. Winter also testified with regard to Mechura, “I found somebody, but he [Cushman] didn’t have to hire him.”

Cushman testified that he interviewed Mechura by himself and determined that “he had the experience necessary for the job.” He also stated that he liked him and that he seemed like a nice guy. Cushman took that information to Winter and let him know that’s how he felt – that Mechura “fit the job,” and was a “nice guy with experience in screen printing.” Along with this information, Cushman testified that he probably also advised that the Employer hire him. There is no further record evidence on the content of the interview or what was discussed. Winter subsequently told Cushman to make an offer to Mechura with a wage of \$17 per hour. There is no evidence that Cushman had any input into what wage should be offered.

At some point during the summer of 2024, Cushman testified that he also let Winter and General Manager Kelly Duclos know that he wanted to bring Ryan back, and they gave him the “thumbs up.” Beyond Cushman’s brief testimony, there are no further details on the process of bringing Ryan back for the seasonal work.

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<sup>5</sup> Winter also at one point testified that he believed Cushman met with two candidates in this process. However, Cushman testified that he only was provided one candidate, Mechura, and Mechura was the only person he interviewed.

Mechura quit in mid-August 2024, around the start of the State Fair. At that time, Cushman went to Winter and told him that they needed more help and that Cushman knew a candidate with full-time screen-printing experience. Cushman recommended they hire this individual but was turned down by Winter. For the rest of the busy season, it was only Cushman, Noah Johnson, and Ryan working in the department.

Around the beginning of October 2024, Winter directed Cushman to tell Ryan his help was not needed anymore. Later that fall, Cushman testified that he made a request to bring Ryan back again as he and Johnson still had a lot of work, but this request was denied.

#### *Spring 2025*

On April 25, 2025, Cushman sent General Manager Kelly Duclos an email outlining the screen-printing department's anticipated increased workload, with 7000 pieces on the schedule for May and the upcoming busy State Fair season, and asking to bring Ryan back full-time. Duclos testified that he and Winter talked about it, but nothing was ultimately done other than acknowledging they got the email and that it was something to keep in mind.

### **C. How the Screen-Printing Department Operates (Assign and Responsible Direction)**

Operations in the screen-printing department originate with orders. Cushman receives requests for quotes on screen-printing jobs from either a salesperson; a Customer Service Representative (CSR); or straight from the customer if working with them directly. Cushman creates a cost estimate using a preexisting, set formula. Cushman will contact vendors who supply materials, such as t-shirts, and get a price from them that is used in the cost formula which eventually leads to the price offered the customer. The cost of the material and the number of places on the item and type of printing the customer wants done are the main factors in the price estimate. The price quote is then provided to the customer. Cushman testified that he does not consider labor costs when producing these quotes, and that he does not have the discretion to decline an order. If the customer approves the job, Cushman begins work on a proof of the product to be printed using the artwork provided by the customer. This proof is created using a digital file which will later be compatible with the screen-printing machine operated primarily by Johnson. If the customer approves the proof sent to them, Cushman then creates a job order with all of the details for the job which anyone can pick up and understand. He puts this information in a file which he brings to Johnson.

Cushman and Johnson then talk about the timeline for the job order, such as when the material ordered for the job is expected to come in; when the customer is expecting the product; what other jobs they have on their plates; and how many printing screens they have available for use – whether they need to reclaim any screens. Cushman testified that combining his knowledge of orders coming in and customer expectations and Johnson's knowledge of the production floor, they decide together when to actually print the job and put a due date on the order. The folders with the orders that need to be produced are placed and kept on a rack. Then, at any given time on a daily basis, Johnson works on the orders due the soonest. Cushman testified that decisions as to who would do what at any given time were otherwise made

collaboratively. For instance, he stated, if there was a job requiring 5 screens, but only 3 were available, Cushman might clean screens while Johnson printed a different job only requiring 3 screens.

In terms of prioritizing orders, in response to a question about what happens when two competing orders are due on the same day, General Manager Duclos testified that Cushman would reach out to the CSR and the CSR would reach out to the customers to see if one of them may be okay with a delay. If neither customer is then Cushman would need to go Duclos (or Winter in the past) and brainstorm with Duclos to see if there is a way to work it out for everyone.

The work in the department is divided up based on employee knowledge and skill. Johnson operates the press all day for the most part because he is an experienced press operator. Cushman testified that temporary employee Ryan had a good brain for maintenance and constructing shelves and workspaces, so he would mostly perform this type of “workflow” work, and Ryan would also catch shirts off the end of the dryer. When another department lends an employee to the screen print area, they are only given jobs requiring no prior screen-printing experience, such as catching shirts off the dryer, folding them, and stacking them in boxes for shipping. As noted above, Cushman also will leave his administrative work and perform production work as needed to get a job done.<sup>6</sup>

There is no evidence that Cushman is held responsible for the work performance of the operator or the temporary employees.

#### *Overtime*

There is no record evidence reflecting what the specific hours of work of the department are or if there is a maintained schedule of employee work hours.

Cushman does not need General Manger Duclos’ permission for him and employees in the screen-printing department to work overtime, but Duclos does need to be informed whenever overtime is being worked. The record evidence reflects that the decision to work overtime is one of necessity. If the amount of work to be completed is more than the employees in the department could complete within a 40-hour week, and the orders would be late otherwise, overtime was worked. The evidence is unclear, but it appears the determination to work overtime was made mutually between Johnson, Cushman, and Ryan (in the summer) to the extent there was any ambiguity regarding the necessity for working it.<sup>7</sup> Cushman testified that there were times Johnson refused to work overtime and left without repercussion. There was no evidence that Cushman had the authority to require employees to work overtime.

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<sup>6</sup> Duclos and Winter testified generally that Cushman scheduled and dictated what the operator did at any given moment throughout the day and that Cushman is the only one in the department who “determines the schedule – the priorities,” but provided very little further specifics on how assignments are made or on daily work related to assignment beyond the testimony on handling orders with the conflicting, same due date.

<sup>7</sup> Robert Mechura was never asked to work overtime because he was a high school student with schedule limitations due to other activities.

#### **D. Transfer**

If Cushman needs extra help in the screen-printing department, he will go to General Manager Duclos who then refers him to the managers of the other departments to see if they can spare the extra help. Duclos testified that if the other manager has spare employees, that other manager will pick the employees to go to the screen-printing department. Duclos also testified a department manager's request to one of their employees to assist in the screen-printing department is "voluntary in nature," and also employees are willing to help out and so they have not had an issue with anyone saying no.

Cushman testified to some more specific information regarding transfers. After his request to bring back Ryan in the fall of 2024 was turned down, he started asking for help from other departments. Since the fall of 2024, he has gone to Curtis Walton, a production manager on the paper side of the business, and asked if he has free hands about six times, and on about four of those times, Walton said yes. Walton has also come to Cushman and asked if Cushman has work that Walton's employees can do a handful of times. When Walton asked, Cushman had taken the employees because he can usually use the help, but one time he said no.

There was no evidence that Cushman can compel anyone from another department to help, and there was no evidence that other departments have asked Cushman if the screen-printing department can spare employees.

People who come to the screen-printing department from other departments help by doing lesser-skilled work, such as folding, taking items off the dryer, and stacking, but not by doing screen printing. These employees will help from a couple of hours to a day or two. Wage rates do not change for the employees who come to help with screen printing. If Cushman is denied help, he will jump in and do the work himself or delay production.

#### **E. Layoffs**

There are only two instances of layoff in the record. One is the layoff of screen-printing operator Noah Johnson which occurred shortly before the May 19 hearing in this case. It is clear from the record that the decision to lay Johnson off was an economic, cost-cutting one that was made by Winter and Duclos in conjunction with the managing partners/owners in Iowa and that Cushman had no role in it. The second is the layoff of Ryan at the end of the summers of 2023 and 2024, where Cushman was instructed by Winter to let Ryan go, and there is no evidence that Cushman was consulted regarding this decision.

#### **F. Discipline**

There is no specific evidence in the record that Cushman had the authority to suspend, discipline, or discharge employees, or to effectively recommend such action. Although no disciplinary issues have arisen, Winter describes Cushman's role as similar to other department managers in that he would expect Cushman to document any behavioral issues and bring them to him and Kelly Duclos and obtain guidance. Duclos likewise testified that Cushman does not

have the authority to discipline without going to him first and that issues should be reported to him and he would work with Cushman to implement an improvement plan, and if conduct was involved, Winter would also need to be involved. However, there is no evidence as to what Cushman's role would be with regard to what, if any, corrective action is taken, and there is no evidence that Cushman has the authority to effectively recommend any such action.

## **G. Reward**

### *Evaluations*

Cushman does not conduct performance evaluations. Winter suggested that Cushman can provide verbal feedback on the performance of other employees, such as to provide negative feedback should there be a performance issue, which there has not been, or conversely on how a new employee is doing. However, there is no evidence as to the significance or ramifications of any such informal reporting.

### *Employer Paid Lunches*

Cushman occasionally buys lunch for screen-printing department employees using the Employer credit card. The Employer provided credit card records of the corporate credit card issued to Cushman covering the period of June 2024 – January 2025, but which appear to be a selection of records from that time. The credit card statements provided contained about five lunch transactions. These included purchases at Culver's, Taco Bell, and Jimmy Johns and typically ranged from \$36 - \$55. Winter testified that Cushman would ask him if he could buy lunch for "the boys" when they were busy and that he does not believe that he ever turned Cushman down. The record reflects that Cushman has never purchased lunch on the Employer credit card without first obtaining permission from Winter.

### *Request for Wage Increases*

The record contains two instances of Cushman asking for raises on behalf of employees in his department. The first appears to be soon after the 2024 State Fair season, which had been very intense with many 60-hour weeks. After this, Cushman believed the employees deserved better compensation, including himself, as he had still not received wage increases that were promised in his offer letter when he was hired. Cushman testified he asked for a raise for all of the employees including himself. He did not testify who he made this raise request to. Sometime later, without evidence of any further discussion, an accountant for the Employer named Lori came and told Cushman that he and Johnson had received raises. It is unclear who made this raise determination. In the second instance, Cushman received a subsequent, unrequested raise in the spring of 2025. When he was informed of this, Cushman asked if Johnson was also getting a raise, and he was informed Johnson was not. At this time, he was also told that it was a decision that was "made higher," and it was not "going to be department wide." Cushman did not testify who he had this conversation with.

## **H. Secondary Indicia and Other Factors**

Both Cushman and Johnson are paid hourly. Cushman makes \$27.00 an hour. Cushman testified that he believed Johnson makes approximately \$23.30 an hour; this was the only record



evidence on Johnson's wage rate. As noted above, Cushman has a desk on the production floor, where he performs his sales/administrative tasks and has historically performed operator work a little over 10% of the time.

Cushman's employment offer letter indicated the position he is hired for is "Screen Printing Manager," and he is held out as the manager of the screen-printing department to customers.

Operations Manager Winter testified that he does not hold what would normally be characterized as manager meetings with any of his managers, but he does meet with Cushman in the course of business as particular issues come up, such as needing to hire more employees or dealing with a difficult customer.

Regarding requests for time off, Cushman testified he automatically approves Noah Johnson's requests and has never denied any request Johnson has given to him. As far as his considerations when always approving these time off requests, Cushman stated that he believes everyone deserves time off. After he approves the request, he passes it on to General Manager Duclos, who has consistently approved these requests. Winter testified that he did not know if Cushman or Duclos had the final say in approving time off, deferring to Duclos, however, Duclos never testified regarding time off requests.<sup>8</sup> No evidence was submitted regarding Cushman's authority to deny time off requests.

## **II. ANALYSIS**

### **A. The Applicable Legal Standard**

Section 2(11) of the Act defines a supervisor as:

Any individual having authority, in the interest of the employer, to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or responsibly to direct them, or to adjust their grievances, or effectively to recommend such action, if in connection with the foregoing the exercise of such authority is not merely of a routine or clerical nature, but requires the use of independent judgment.

Section 2(11) of the Act sets three requirements for establishing supervisory status. Purported supervisors must possess at least 1 of the 12 enumerated supervisory functions, exercise independent (as opposed to routine or clerical) judgment in applying that authority, and exercise that authority "in the interest of the employer." *NLRB v. Kentucky River Community*

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<sup>8</sup> Duclos only generally testified that Cushman manages Johnson's attendance. When asked to clarify, Duclos testified that if Johnson were unable to come in, he would "be in touch with" Cushman, and vice versa. Cushman testified that he has never reprimanded Johnson for attendance, even though he is frequently absent due to a certain health issue, nor does he believe it is his place to reprimand him. Cushman testified that if there were an attendance issue affecting the department he would report the situation to Duclos, but he did not consider it to be his responsibility to deal with it.

*Care, Inc.*, 532 U.S. 706, 713 (2001). Supervisory status may likewise be established if the individual in question has the authority to effectively recommend one of the powers. See, *Children's Farm Home*, 324 NLRB 61, 65 (1997). The Board has held that an effective recommendation requires the absence of an independent investigation by superiors and not simply that the recommendation be followed. *Id.*

The party asserting supervisory status bears the burden of proof and must establish it by a preponderance of the evidence. See *Oakwood Healthcare, Inc.*, 348 NLRB 686, 694 (2006) (citations omitted). Any lack of evidence is construed against the party asserting supervisory status. *Elmhurst Extended Care Facilities*, 329 NLRB 535, 536 fn. 8 (1999); *Dean & Deluca New York, Inc.*, 338 NLRB 1046, 1048 (2003). Conclusory statements without supporting evidence do not establish supervisory authority. *Volair Contractors, Inc.*, 341 NLRB 673, 675 (2004); *Golden Crest Healthcare Center*, 348 NLRB 727, 731 (2006); *Lynwood Manor*, 350 NLRB 489, 490 (2007). “[P]aper authority” which is not exercised does not prove supervisory status. *North Miami Convalescent Home*, 224 NLRB 1271, 1272 (1976). And supervisory status is not established where the record evidence is “in conflict or otherwise inconclusive.” *Phelps Community Medical Center*, 295 NLRB 486, 490 (1989), *Dole Fresh Vegetables, Inc.*, 339 NLRB 785, 793 (2003).

Indicia other than those enumerated in Section 2(11) of the Act are secondary indicia. Although secondary indicia may be considered in determining supervisory issues, they are not dispositive. In the absence of one of the enumerated primary indicia, secondary indicia, standing alone, are insufficient to establish supervisory status. *St. Francis Medical Center-West*, 323 NLRB 1046 (1997).

In determining whether persons are statutory supervisors, “[j]ob titles are unimportant.” *Laborers Local 341 v. NLRB*, 564 F.2d 834, 847 (9th Cir. 1977). Accord: *Walla Walla Union-Bulletin v. NLRB*, 631 F.2d 609, 613 (9th Cir. 1980) (“[T]he specific job title of the employees is not controlling.”); *Arizona Public Service Co. v. NLRB*, 453 F.2d 228, 231 fn. 6 (9th Cir. 1971) (The job title is “irrelevant”). Whether an employee is a supervisor is to be determined in light of the employee’s actual authority, responsibility, and relationship to management. *Phillips v. Kennedy*, 542 F.2d 52, 55 (8th Cir. 1976). Thus, the Act requires “evidence of actual supervisory authority visibly translated into tangible examples demonstrating the existence of such authority.” *Oil Workers v. NLRB*, 445 F.2d 237, 243 (D.C. Cir. 1971). Although “[a] supervisor may have potential powers, ... theoretical or paper power will not suffice. Tables of organization and job descriptions do not vest powers.” *Id.* at 243, quoting *NLRB v. Security Guard Service*, 384 F.2d 143, 149 (5th Cir. 1967). Accord: *St. Alphonsus Hospital*, 261 NLRB 620, 630-631 (1982). Additionally, the evidence must “fairly” show that “that the alleged supervisor knew of his authority to exercise” the supervisory power. *NLRB v. Tio Pepe, Inc.*, 629 F.2d 964, 969 (4th Cir. 1980).

## **B. Application of Legal Standard**

The Employer maintains that Cushman is a supervisor based on multiple Section 2(11) indicia, including through his engaging in hiring, requesting transfers of employees into his

department, requesting wage increases, approving time off, setting schedules, assigning work and priorities in his department, and participating in meetings as a manager of his department.<sup>9</sup> The Section 2(11) indicia which are implicated by the evidence on the record are discussed below. For the reasons set forth in these discussions, the Employer has not met its burden of establishing Cushman's supervisory status.

### ***1. Hiring/Recall***

The Employer does not claim that Cushman possess the authority to independently hire other employees, but rather that he can effectively recommend their hire.

In *J.C. Penney Corp.*, 347 NLRB 127, 129 (2006), the Board explained that:

[T]he power to effectively recommend a hire. . . contemplates more than the mere screening of applications or other ministerial participation in the interview and hiring process. See, *Bowne of Houston*, 280 NLRB 1222, 1225 (1986) (assistant foreman who interviewed applicants and advised management of the experience of at least one of them did not make hiring decisions or effective recommendations to hire, as management also interviewed all applicants and had final hiring authority); *The Door*, 297 NLRB 601, 601–02 (1990) (finding that an employee lacked authority to effectively recommend hire where his role in the hiring process was limited to screening resumes, making recommendations with respect to technical qualifications, and participating, along with others, in applicant interviews).

The Board has found recommendations effective when “management is prepared to implement the recommendation without an independent investigation of the relevant circumstances.” *Chevron USA*, 309 NLRB 61, 65 (1992). In the absence of such a requirement, an employer's reliance on word-of-mouth referrals could confer supervisory status on the entire staff, since it is not uncommon for employers to expect their more experienced employees to recommend someone for hire. See, *NLRB v. Adco Electric, Inc.*, 6 F.3d 1110, 1117 (5th Cir. 1993). The Board has likewise found that “compatibility recommendations” are insufficient to support a finding of effective hiring recommendations under Section 2(11). *Tree-Free Fiber Co.*, 328 NLRB 389, 391 (1999). Finally, an individual does not “effectively recommend hiring” unless there was “delegated authority to participate in the hiring process” and not merely an employer's respect for an individual's opinion on an applicant. See, *Plumbers Local 195*, 237 NLRB 1099, 1102 (1978).

The record reflects only a single clear example of Cushman's asserted authority to effectively recommend hire—that of his role in conjunction with hiring seasonal employee Robert Mechura. The hiring process began with Operations Manager Winter contacting former screen-printing manager Barrett and subsequently receiving about three candidate recommendations from him. Winter then selected Mechura from these referrals; however, there is no record evidence concerning how Winter

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<sup>9</sup> This is taken from the Employer's statement of its final position on the record. Neither party presented an oral argument or requested permission to file post-hearing briefs.

chose this one candidate to refer on to Cushman. Winter testified that Cushman met with Mechura to “make sure he had the skills.” The record also showed that Cushman believed after the interview that Mechura seemed nice. There was no more additional evidence as to the interview content, or if there was any assessment by Cushman beyond these two items. As result, the totality of the record evidence regarding the Employer’s process in hiring Mechura is only sufficient enough to establish that Cushman’s interview of Mechura was a screening for technical skills and compatibility within a small department. The Board has not found such screenings to confer supervisory status on employees. *Kenosha News Pub. Corp.*, 264 NLRB 270, 271 (1982). See also *International Center For Integrative Studies/The Door*, 297 NLRB 601, 601-602 (1990) (an assessment of a candidate’s technical ability to perform the job does not constitute an effective hiring recommendation). Although Winter also claimed that Cushman “did not have to hire” Mechura, this fails to confer supervisory status upon Cushman as the evidence is insufficient to demonstrate that Cushman was engaged in anything more than giving a positive or negative report as part of a delegated skills and compatibility assessment.

Furthermore, the record showed that on more than one occasion, Cushman recommended that Ryan be hired back after being laid off and that these recommendations were not followed. The Employer also did not follow Cushman’s recommendation to hire an additional individual in the summer of 2024 after Mechura quit. These instances call into question the effectiveness of Cushman’s recommendations. For a recommendation to be effective, it must be followed by management without independent review. *Chevron USA*, 309 NLRB 61, 65 (1992). The evidence surrounding these other recommendations shows that management is independently evaluating the relevant circumstances around Cushman’s hiring recommendations. An employer need not always follow a hiring recommendation for a recommendation to be found effective, but the definition of effectiveness is, at a minimum, that the recommended result occurs more often than not. *Venture Industries, Inc.*, 327 NLRB 918, 919 (1999) (Hiring recommendations found to be effective where followed 80% to 90% of the time.)<sup>10</sup>

Accordingly, I find the Employer has failed to establish that Cushman possesses supervisory authority to hire or effectively recommend hire as defined by the Act.

## ***2. Assignment and Responsible Direction***

### **Assignment**

The Board defines “assign” as referring “to the act of designating an employee to a place (such as a location, department, or wing), appointing an employee to a time (such as a shift or overtime period), or giving significant overall duties, i.e., tasks, to an employee.” *Oakwood*, 348 NLRB at 689. Elaborating on this definition, the Board stated that “assignment of an employee to a certain department (e.g., housewares) or to a certain shift (e.g., night), or to certain significant overall tasks (e.g., restocking shelves) would generally qualify as ‘assign’ ... However, choosing the order in which the employee will perform discrete tasks within those

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<sup>10</sup> As noted in the factual section, Winter testified that Cushman initially hired Ryan, which conflicted with Cushman’s more specific testimony that Ryan was already working when he was hired. Notwithstanding the lack of more specific Employer evidence regarding Cushman’s involvement in the hiring of Ryan, conflicting evidence is insufficient to establish supervisory authority. *Phelps Community Medical Center*, supra.

assignments (e.g., restocking toasters before coffeemakers) would not be indicative of assignment authority. *Ibid.*

Assignments that are based on well-known employee skills or equalizing workloads do not involve independent judgment. *Cook Inlet Tug & Barge, Inc.*, 362 NLRB 1153, 1154 (2015); *CNN America*, 361 NLRB at 460 (citing *KGW-TV*, 329 at 381–382, *enfd.* in relevant part 865 F.3d 740 (DC Cir. 2017)); see also *S.D.I. Operating Partners, L.P.*, 321 NLRB 111 (1996). Similarly, basing an assignment on whether the employee is capable of performing the job does not involve independent judgment. See *WSI Savannah River Site*, 363 NLRB No. 113, slip op. at 3 (2016) (citing *Volair Contractors, Inc.*, 341 NLRB 673, 675 fn. 10 (2004)); *Cook Inlet Tug & Barge, Inc.*, *supra.*, (citing *Croft Metals*, 348 NLRB at 722). Nor is independent judgment established by the assignment of recurrent and predictable tasks. *Shaw, Inc.*, 350 NLRB 354 (2007); *Croft Metals*, *above* at 721 fn. 14 (2006) (citing *Franklin Home Health Agency*, 337 NLRB 826, 831 (2002); *Bowne of Houston*, 280 NLRB 1222, 1223 (1986)). As noted above, assignment of work in a merely routine, clerical, or perfunctory manner, where there is only one self-evident choice, or solely on the basis of equalizing workloads does not require independent judgment. *Oakwood*, 348 NLRB at 693.

With regard to assigning employees to a place, there is only one location involved in this case, the screen-printing department, where employees under Cushman work, and there was no evidence that Cushman assigned Johnson or the seasonal employees to other departments or locations. As a result, no independent judgment is implicated by this subfactor.

Concerning appointing employees to a time, there was no evidence that employees were assigned to specific, identified schedules. The department employees appeared to generally have the same work hours; however, there was no evidence as to how the specific work hours, such as the regular starting and stopping times, were determined.

Regarding overtime, employees in the department do not need permission to work overtime, but Cushman is expected to inform General Manager Duclos when overtime is worked. Whether overtime is worked is determined by necessity, if extra hours are needed to ensure the completion of orders in a timely manner. The evidence showed that decisions around when and how long to work are arrived at by Cushman working collaboratively with the employees in the department, which is insufficient to support a finding of independent judgment. *Tracy Toyota*, 372 NLRB No. 101 (July 6, 2023) (assignments by foremen lack independent judgement where carried out in collaboration with employees subject to the assignment) citing *KGW-TV*, 329 NLRB 378, 381-382 (1999) (finding assignment editors' responsibility of matching particular stories with the right reporters and photographers not supervisory where assignment process was a collaborative effort in which reporters' preferences were considered). Further, and significantly, there was no evidence that Cushman could require employees to work overtime, which is necessary to establish supervisory status. See *Entergy Mississippi, Inc.*, 357 NLRB 2150, 2156 (2011) (to establish that assigning overtime is supervisory, the evidence must show that the alleged supervisor can require employees to work the overtime assigned to them) (citing *Golden Crest Healthcare Center*, 348 NLRB 727, 729 (2006)).

Concerning assignment of overall duties, the record evidence showed that the tasks employees were assigned were based on well-known skills and capabilities. Accordingly, Johnson, an experienced screen-printing operator, primarily does the press work. Temporary employee Ryan was skilled in maintenance and work-process improvements, so that is the work he would perform. Employees from other departments did not have screen-printing experience, so they were assigned tasks they were capable of performing, such as folding printed items and placing them in boxes to be shipped. Therefore, there is insufficient evidence that Cushman utilized independent judgement with regard to this subfactor.

As noted above, determining the order in which to complete discrete tasks is not indicative of supervisory authority. *Oakwood*, 348 NLRB at 689. However, in any event, there is insufficient evidence that Cushman engages in independent judgement in this vein. The order in which Johnson completes printing tasks is governed by the overarching guideline of order due dates, with those due the soonest going first. In addition, Cushman testified to the collaborative, not independent, process he engages in with Johnson for determining order sequence and logistics where he brings his knowledge of orders coming in and customer expectations with Johnson's knowledge of the status of equipment on the production floor. See *Tracy Toyota* and *KGW-TV*, *supra*. Further, the record showed that even when two orders were due the same day and could not both be completed, the decision of which to do first was not made independently by Cushman. Rather, the customers were asked if they were agreeable to a delay, and if neither was, the issue was escalated to Cushman's supervisor, who would work with Cushman on figuring out a solution.

Accordingly, I do not find that Cushman possesses the supervisory authority, as defined by the Act, to assign employees to places, times, or significant overall duties.

#### Responsible Direction

In order for direction to be responsible, the purported supervisor must be held accountable for the directions they give. To establish accountability, the Board holds that "it must be shown that the employer delegated to the putative supervisor the authority to direct the work and the authority to take corrective action, if necessary. It also must be shown that there is a prospect of adverse consequences for the putative supervisor if he/she does not take these steps." *Oakwood Healthcare, Inc.*, 348 NLRB 686, 692 (2006). This prospect of adverse consequences "must be a more-than-merely-paper showing that such a prospect exists." *Golden Crest*, 348 NLRB at 731. The Board will not find accountability where the evidence shows that the putative supervisors "are accountable for their *own* performance or lack thereof, not the performance of *others*." *Oakwood Healthcare*, 348 NLRB at 695; see also *Entergy Mississippi, Inc.*, 357 NLRB at 2154-2155 (responsible direction not established where the record failed to show that dispatchers were held accountable for "work deficiencies" of the field employees they purportedly supervised).

Because there is no evidence that Cushman is held accountable for the directions he gives to the employees in his department or for any of their work deficiencies, if they occur, I find the Employer has failed to establish Cushman responsibly directs other employees.

### **3. Transfer**

The Employer asserts Cushman has the authority to effectively recommend transfers by virtue of asking other departments whether they can spare some of their employees to assist for the day or a couple hours. The record reflects that after receiving approval to do so from his supervisor, General Manager Duclos, Cushman goes to the manager of another department and requests if they could spare some employees to assist the screen-printing department. If the other manager determines they can spare the labor, that other manager, not Cushman, selects the employee(s) to assist in screen-printing. These employees then perform tasks requiring no screen-printing skill, such as folding shirts and stacking them in boxes. Furthermore, the record evidence showed that the assistance appears to be voluntary on the part of the employee, and there is no evidence that Cushman can compel it.

As Cushman receives permission from his supervisor before requesting assistance; the other department manager determines if assistance will be offered and by whom; and the assistance appears to be voluntary on the part of the employee and there is no evidence it can be compelled by Cushman, I find Cushman does not possess the authority to effectively transfer employees from other departments to the screen-printing department. See *Golden Crest Healthcare Center*, 348 NLRB 727, 729 (2006) (“the party seeking to establish supervisory authority must show that the putative supervisor has the ability to *require* that a certain action be taken; supervisory authority is not established where the putative supervisor has the authority merely to *request* that a certain action be taken”) (italics in original, citing to *Heritage Hall, E.P.I. Corp.*, 333 NLRB 458, 459 (2001) and *Lynwood Health Care Center, Minnesota v. NLRB*, 148 F.3d 1042, 1047 (8th Cir. 1998)).

### **4. Promote/Reward**

The Board will find the authority to reward where putative supervisors use independent judgment in granting merit wage increases or otherwise substantially impacting the terms and conditions of other employees, for example, by awarding bonuses.

#### *Evaluations*

Cushman does not perform regular employee evaluations, and, at most, may provide occasional feedback on how an employee is doing. There is no evidence as to the significance monetarily or otherwise of any such informal reporting. Accordingly, the evidence in this regard is insufficient to establish supervisory authority. See *Modesto Radiology Imaging, Inc.* 361 NLRB 888, 889 (2014) (“There must be a direct correlation between the employees’ evaluation and their wage increases and/or job status.”) citing *Ten Broeck Commons*, 320 NLRB 806, 813 (1996).

#### *Wage Increases*

The record reflects two instances of Cushman asking for a raise for screen-printing department employees. One request was denied and the other resulted in a wage increase, the raise both operator Noah Johnson and Cushman received after the busy 2024 summer. In this instance, Cushman’s request was not part of any formal or informal employee evaluation process

as is more typically linked to instances where employees are found to have the authority to recommend wage increases. The record also failed to establish that Cushman exercised independent judgement in deciding to ask for a raise for his coworker. Further, there is no evidence as to what factors, if any, were considered by the Employer in deciding to grant the wage increase, or if the Employer conducted any independent assessment. Accordingly, the evidence related to this single incident is insufficient for the Employer to meet its burden of establishing that Cushman has the ability to effectively recommend wage increases.

#### *Lunches*

The evidence showed Cushman occasionally asked Operations Manager Winter if he could put lunch for the department, including himself, on the Employer's credit card when they were busy and working hard. Although Winter routinely granted this request, the evidence did not establish that the requests were routine rather than sporadic. The record reflected around five instances of fast food being purchased over the course of about six months. The lunches benefitted the whole department as a general treat but were not the result of any independent judgement being applied to any individual employee performance metric. The record only indicated that Cushman considered requesting the lunch when they were "busy" and "working hard." As such, I find the occasional provision of the lunches insufficient to confer supervisory status. See *Veolia Transportation*, 363 NLRB No. 188, slip op. at 9–10 (2016) (even assuming distribution of \$25 gift cards could constitute a reward, evidence did not establish this was more than sporadic or involved independent judgment).<sup>11</sup>

#### **5. Layoff**

There was no evidence that Cushman was involved in layoff decisions made by the Employer. Rather, the record evidence demonstrated that Cushman was instructed to inform employees they were being laid off after the managers above Cushman made the decision. There was also no evidence that Cushman recommended employees be laid off. Accordingly, I find Cushman does not have the authority to lay off employees or effectively recommend layoffs.

#### **6. Suspend/Discipline/Discharge**

Cushman never suspended, disciplined or discharged any employees, and there is no evidence he has authority to impose these disciplines. There was testimony concerning how Cushman might be involved if there were to be a performance or conduct issue in the department. However, the evidence was insufficient to show that any such role would go beyond merely reporting any such issue. Simply bringing substandard performance or conduct issues to the employer's attention without recommendations for future discipline serves as nothing more than a reporting function and is not evidence of supervisory authority. See *Williamette Industries, Inc.*, 336 NLRB 743, 744 (2001); *Loyalhanna Health Care Associates*, 332 NLRB

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<sup>11</sup> I also note that these occasional lunches very well may be too de minimis to even constitute a reward as they are not substantial enough to implicate terms and conditions of employment. See *EIS Brake Parts*, 331 NLRB 1466, 1469 (2000) (employer's occasionally providing small food items to employees not a sufficiently substantial benefit to constitute "terms and conditions of employment" for purposes of sustaining a violation of Section 8(a)(5)) citing *Benchmark Industries*, 270 NLRB 22 (1984), affd. 760 F.2d 267 (5th Cir. 1985).



933, 934 (2000) (warning merely reportorial where it simply described incident, did not recommend disposition, and higher authority determined what, if any, discipline was warranted); *Ten Broeck Commons*, 320 NLRB 806, 812 (1996) (written warnings that are merely reportorial and not linked to disciplinary action affecting job status are not evidence of supervisory authority). Accordingly, I find Cushman does not have the authority to discipline or to effectively recommend discipline.

## ***7. Secondary Indicia***

As noted above, in the absence of one of the enumerated primary indicia, secondary indicia, standing alone, are insufficient to establish supervisory status. Since the Employer failed to carry its burden of showing by a preponderance of evidence that Cushman possessed any primary supervisory indicia, the secondary indicia are not dispositive and need not be analyzed in depth here. Cushman having a workspace on the shop floor and being paid hourly at a wage rate that is not significantly disproportionate with Johnson's are consistent with employee status. Cushman's managerial title, especially as it is held out to customers, appears, in part, to be closely tied to facilitating Cushman's duties in working with them. I further note that titles, by themselves, do not confer status. *Heritage Hall, EPI Corp.*, 333 NLRB 458, 458-459 (2001) ("It is well settled that employees cannot be transformed into statutory supervisors merely by vesting them with the title or job description of supervisor") citing *Schnurmacher Nursing Home v. NLRB*, 214 F.3d 260, 266,(2d Cir. 2000); *T.K. Harvin & Sons*, 316 NLRB 510, 530 (1995). Cushman also does not attend any regularly-held management meetings.

Regarding Cushman's ability to approve time off requests, the authority to grant time off is a secondary indicium of supervisory status. *Modesto Radiology Imaging, Inc.*, 361 NLRB 888, 890 fn. 4 (2014) (citing *Sam's Club*, 349 NLRB 1007, 1014 (2007)); see also, *BluePearl Specialty & Emergency Pet Hospital*, 19-UC-239832 (Apr. 10, 2020) (unpublished) ("approving leave requests is a secondary indicium of supervisory status," citing *Pacific Coast M.S. Industries*, 355 NLRB at 1423 fn. 12). Cushman approves all requests considering only that everyone deserves time off and then reports the absence to Winter or Duclos. The record is unclear as to whether he can deny a leave request. Thus, to the extent that Cushman actually approves time off requests, the evidence fails to establish that such approvals are more than routine and clerical in nature. Given this and that approving time off is only a secondary indicium, Cushman's involvement in the time off request process does not confer upon him supervisory authority.

## **CONCLUSION**

In reaching my conclusion that the screen-printing manager is not a statutory supervisor, I have carefully weighed the indicia of supervisory authority set forth in Section 2(11) of the Act. I conclude that the evidence fails to establish that the screen-printing manager possesses any of the authorities listed in Section 2(11). As I have found the screen-printing manager is not a statutory supervisor, and is therefore included in the bargaining unit, I do not reach the second question of whether the unit is a stable, one-person unit.

Based on the foregoing, I conclude that the following employees of the Employer constitute a unit appropriate for the purpose of collective bargaining within the meaning of Section 9(b) of the Act:

All full-time and regular part-time employees that perform screen printing on fabric employed by the Employer at its Minneapolis, Minnesota facility; excluding all other employees, office clericals, managerial employees, and guards and supervisors as defined in the Act.

### **DIRECTION OF ELECTION**

The National Labor Relations Board will conduct a secret ballot election among the employees in the unit found appropriate above. Employees will vote whether or not they wish to be represented for purposes of collective bargaining by INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES, LOCAL 880 SIGN AND DISPLAY.

#### **A. Election Details**

The election will be held on Thursday, August 14, 2025, from 11:00 a.m. to 11:30 a.m. (CDT), in the small conference room at the Employer's 1820 Elm Street Southeast, Minneapolis, Minnesota facility.<sup>12</sup>

#### **B. Voting Eligibility**

Eligible to vote are those in the unit who were employed during the payroll period ending August 3, 2025, including employees who did not work during that period because they were ill, on vacation, or temporarily laid off. In a mail ballot election, employees are eligible to vote if they are in the unit on both the payroll period ending date and on the date they mail in their ballots to the Board's designated office.

Employees engaged in an economic strike, who have retained their status as strikers and who have not been permanently replaced, are also eligible to vote. In addition, in an economic strike that commenced less than 12 months before the election date, employees engaged in such strike who have retained their status as strikers but who have been permanently replaced, as well as their replacements, are eligible to vote. Unit employees in the military services of the United States may vote if they appear in person at the polls.

Ineligible to vote are (1) employees who have quit or been discharged for cause since the designated payroll period, and, in a mail ballot election, before they mail in their ballots to the Board's designated office; (2) striking employees who have been discharged for cause since the strike began and who have not been rehired or reinstated before the election date; and (3) employees who are engaged in an economic strike that began more than 12 months before the election date and who have been permanently replaced.

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<sup>12</sup> The Petitioner waived all of the 10 days it is entitled to have the voter list prior to the election.

### C. Voter List

As required by Section 102.67(l) of the Board's Rules and Regulations, the Employer must provide the Regional Director and parties named in this decision a list of the full names, work locations, shifts, job classifications, and contact information (including home addresses, available personal email addresses, and available home and personal cell telephone numbers) of all eligible voters.

To be timely filed and served, the list must be *received* by the regional director and the parties by **Friday, August 8, 2025**. The list must be accompanied by a certificate of service showing service on all parties. **The region will no longer serve the voter list.**

Unless the Employer certifies that it does not possess the capacity to produce the list in the required form, the list must be provided in a table in a Microsoft Word file (.doc or docx) or a file that is compatible with Microsoft Word (.doc or docx). The first column of the list must begin with each employee's last name and the list must be alphabetized (overall or by department) by last name. Because the list will be used during the election, the font size of the list must be the equivalent of Times New Roman 10 or larger. That font does not need to be used but the font must be that size or larger. A sample, optional form for the list is provided on the NLRB website at [www.nlr.gov/what-we-do/conduct-elections/representation-case-rules-effective-april-14-2015](http://www.nlr.gov/what-we-do/conduct-elections/representation-case-rules-effective-april-14-2015).

When feasible, the list shall be filed electronically with the Region and served electronically on the other parties named in this decision. The list may be electronically filed with the Region by using the E-filing system on the Agency's website at [www.nlr.gov](http://www.nlr.gov). Once the website is accessed, click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions.

Failure to comply with the above requirements will be grounds for setting aside the election whenever proper and timely objections are filed. However, the Employer may not object to the failure to file or serve the list within the specified time or in the proper format if it is responsible for the failure.

No party shall use the voter list for purposes other than this proceeding, Board proceedings arising from it, and related matters.

### D. Posting and Notices of Election

Pursuant to Section 102.67(k) of the Board's Rules, the Employer must post copies of the Notice of Election, which will be provided separately, in conspicuous places, including all places where notices to employees in the unit found appropriate are customarily posted. The Notice must be posted so all pages of the Notice are simultaneously visible. In addition, if the Employer customarily communicates electronically with some or all of the employees in the unit found appropriate, the Employer must also distribute the Notice of Election electronically to those

employees. The Employer must post copies of the Notice at least 3 full working days prior to 12:01 a.m. of the day of the election and copies must remain posted until the end of the election. For purposes of posting, working day means an entire 24-hour period excluding Saturdays, Sundays, and holidays. However, a party shall be estopped from objecting to the nonposting of notices if it is responsible for the nonposting, and likewise shall be estopped from objecting to the nondistribution of notices if it is responsible for the nondistribution. Failure to follow the posting requirements set forth above will be grounds for setting aside the election if proper and timely objections are filed.

### **RIGHT TO REQUEST REVIEW**

Pursuant to Section 102.67 of the Board's Rules and Regulations, a request for review may be filed with the Board at any time following the issuance of this Decision until 10 business days after a final disposition of the proceeding by the Regional Director. Accordingly, a party is not precluded from filing a request for review of this decision after the election on the grounds that it did not file a request for review of this Decision prior to the election. The request for review must conform to the requirements of Section 102.67 of the Board's Rules and Regulations.

A request for review may be E-Filed through the Agency's website but may not be filed by facsimile. To E-File the request for review, go to [www.nlrb.gov](http://www.nlrb.gov), select E-File Documents, enter the NLRB Case Number, and follow the detailed instructions. If not E-Filed, the Request for Review should be addressed to the Executive Secretary, National Labor Relations Board, 1015 Half Street SE, Washington, DC 20570-0001, and must be accompanied by a statement explaining the circumstances concerning not having access to the Agency's E-Filing system or why filing electronically would impose an undue burden. A party filing a request for review must serve a copy of the request on the other parties and file a copy with the Regional Director. A certificate of service must be filed with the Board together with the request for review. Neither the filing of a request for review nor the Board's granting a request for review will stay the election in this matter unless specifically ordered by the Board.

Dated: August 6, 2025

/s/ Jennifer A. Hadsall

Jennifer A. Hadsall, Regional Director  
National Labor Relations Board  
Region 18  
Paul D. Wellstone Federal Building  
212 Third Avenue South, Suite 200  
Minneapolis, MN 55401-2657