

IN THE NEBRASKA COMMISSION OF INDUSTRIAL RELATIONS

NEBRASKA ASSOCIATION OF	)	
PUBLIC EMPLOYEES LOCAL 61	)	
of the AMERICAN FEDERATION	)	
OF STATE, COUNTY, AND	)	
MUNICIPAL EMPLOYEES,	)	
	)	
	)	
Petitioner,	)	CASE NO.
	)	
v.	)	MOTION FOR TEMPORARY
	)	RELIEF
COUNTY OF RICHARDSON a	)	
political subdivision, and	)	
RICHARDSON COUNTY	)	
BOARD OF COMMISSIONERS,	)	
JOHN J. CAVERZAGIE, BOB	)	
CAMPBELL, RICK KARAS,	)	
	)	
Respondent.	)	

COMES NOW, the Petitioner pursuant to Neb. Rev. Stat. §§ 48-816 and 48-816.02 and moves this court for an order temporarily prohibiting the implementation of the use of a GPS and/or AI-Integrated camera system, which mandates changes to the working conditions of Petitioner employees without engaging in collective bargaining.

Petitioner is entitled to such relief as a petition has been filed with the Commission pursuant to Neb. Rev. Stat. §48-811 alleging an industrial dispute pursuant to the Industrial Relations Act.

Petitioner seeks said relief to preserve and protect the status of the parties, property, and public interest involved pending final determination of the issues. The Respondent, being fully aware of the

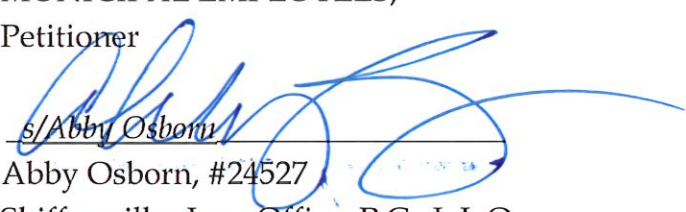
need to bargain over this issue, has since proceeded to begin requiring employees to comply the use of a GPS and/or AI-Integrated camera systems and to subject NAPE/ AFSCME employees to discipline related to their use without any policy or procedure in place related to the use of such in violation of the parties Collective Bargaining Agreement.

The Petitioner requests an order by the Commission directing the Respondent that employees covered by the collective bargaining agreement shall not be the use of a GPS and/or AI-Integrated camera system pending disposition of the petition by the Commission.

The Petitioner would request that the temporary relief be granted until such time as the Respondent engages in good faith bargaining to impasse or agreement of the terms and conditions of employment identified in the demand to bargain sent by the Petitioner and that the Respondent be ordered to engage in bargaining.

DATED, July 7, 2026.

NEBRASKA ASSOCIATION OF
PUBLIC EMPLOYEES LOCAL 61 of
the AMERICAN FEDERATION OF
STATE, COUNTY, AND
MUNICIPAL EMPLOYEES,
Petitioner

By: 
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