

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

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

**INSTRUCTIONS:** File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

<b>1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT</b>				
a. Name Workers United, an SEIU affiliate		b. Union Representative to contact Lynne Fox, International President		
c. Address ( <i>Street, city, state, and ZIP code</i> ) 22 South 22nd St. Philadelphia, PA 19103		d. Tel. No. (646) 448-6414	e. Cell No.	
		f. Fax No. (215) 575-9065		
		g. e-mail sbwu_nbc@workers-united.org		
h. The above-named labor organization has engaged in and is engaging in unfair labor practices within the meaning of section 8(b) and (list subsections) 8(b)(1)(a) and 8(b)(3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.				
2. Basis of the Charge ( <i>set forth a clear and concise statement of the facts constituting the alleged unfair labor practices</i> ) See attachment.				
3. Name of Employer Starbucks Corporation		4a. Tel. No. (414) 291-5536	b. Cell No. (414) 698-6243	c. Fax No. (414) 291-5526
		d. e-mail jlevine@littler.com		
5. Location of plant involved ( <i>street, city, state and ZIP code</i> ) All U.S. stores including without limitation the stores located at 3390 E. 7th St., Long Beach, CA 90804 and 500 Long Beach Blvd., Long Beach, CA 90802.		6. Employer representative to contact Jonathan Levine		
7. Type of establishment ( <i>factory, mine, wholesaler, etc.</i> ) Retail stores	8. Identify principal product or service Food and beverage		9. Number of workers employed Approximately 400,000	
10. Full name of party filing charge Starbucks Corporation				
11. Address of party filing charge ( <i>street, city, state and ZIP code</i> ) 111 E. Kilbourn Ave., Suite 1000, Milwaukee, WI 53202		11a. Tel. No. (414) 291-5536	b. Cell No. (414) 698-6243	c. Fax No. (414) 291-5526
		d. e-mail jlevine@littler.com		
<b>12. DECLARATION</b>			Tel. No. (414) 291-5536	
I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.			Cell No. (414) 698-6243	
/s/ Jonathan Levine		Jonathan Levine		
<i>(signature of representative or person making charge)</i>		<i>(Print/type name and title or office, if any)</i>		
			Fax No. (414) 291-5526	
Address <u>111 E. Kilbourn Ave., Suite 1000, Milwaukee, WI 53202</u>			Date <u>June 26, 2023</u>	
			e-mail jlevine@littler.com	

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

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

### **Attachment to Charge Against Workers United**

Starbucks is a leading employer in the fight for LGBTQIA2+ rights. Within the past six months and continuing to date, the union and its agents have engaged in a smear campaign that includes deliberate misrepresentations to Starbucks partners, which coerces partners in the exercise of their Section 7 rights and violates the union's duty to fairly represent partners and bargain in good faith with Starbucks. The union's violations have ignited and inflamed workplace tension and division and provoked strikes and other business disruptions in Starbucks stores. The union's unlawful campaign includes, without limitation, making deliberate misrepresentations that include maliciously and recklessly false statements about the industry-leading gender affirming care benefits Starbucks offers its partners. Starbucks continues to provide its partners with industry-leading gender affirming care benefits. The union has knowingly and falsely stated that Starbucks eliminated or changed the benefits coverage for its LGBTQIA2+ partners. Section 7 of the National Labor Relations Act provides employees with the right to join and support a union and the "right to refrain . . . from such activities." The union's transparently cynical effort to denigrate Starbucks and pit its partners against each other and Starbucks restrains and coerces partners in the exercise of their Section 7 rights in violation of Section 8(b)(1)(A) and violates its duty to bargain in good faith with Starbucks under Section 8(b)(3) of the Act.