

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

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.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code)  2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed Est. 245,000
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) 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 (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See Attached

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

## 6. DECLARATION

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



(signature of representative or person making charge)

Gabe Frumkin, Attorney

(Print/type name and title or office, if any)

Barnard Iglitzin & Lavitt LLP  
18 West Mercer St., Ste. 400  
Address Seattle, WA 98119

Date 06/10/2022

Tel. No. (206) 257-6012
Office, if any, Cell No.
Fax No. (206) 378-4132
e-mail frumkin@workerlaw.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.

## **2. Basis of the Charge**

Within the last six months, and particularly on or about June 10, 2022, Starbucks through its CEO Howard Schultz violated the Act when:

1. Schultz made an implied or actual threat to refuse to engage in good-faith bargaining with the Union.
2. Schultz made an implied or actual statement of futility by saying Starbucks will never accept the Union.
3. Schultz made an implied or actual threat that Starbucks will lose business because customers will go elsewhere if workers unionize.

These announcements constitute an unlawful refusal to bargain in good faith at the more than 150 stores at which employees have already voted to unionize nationwide, and constitute unlawful statements that could deter employees at hundreds of other stores currently organizing nationwide from engaging in protected activity. Because of Schultz's demonstrated propensity for using his national platform to make unlawful statements and their potential to inflict irreparable injury upon numerous ongoing union organizing efforts throughout the country, relief under Section 10(j) is requested.