

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.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT				
a. Name Workers United, an SEIU affiliate		b. Union Representative to contact Edgar Romney Secretary-Treasurer		
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 edgar.romney@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) 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. 414-374-3980	c. Fax No. 414-291-5539
		d. e-mail atuzzo@littler.com		
5. Location of plant involved (<i>street, city, state and ZIP code</i>) 2975 E. Colfax Ave, Denver, CO 80206		6. Employer representative to contact Adam-Paul Tuzzo		
7. Type of establishment (<i>factory, mine, wholesaler, etc.</i>) Restaurant	8. Identify principal product or service Food and Beverage		9. Number of workers employed	
10. Full name of party filing charge Starbucks Corporation				
11. Address of party filing charge (<i>street, city, state and ZIP code</i>) 2975 E. Colfax Ave, Denver, CO 80206		11a. Tel. No. 414-291-5536	b. Cell No. 414-374-3980	c. Fax No. 414-291-5539
		d. e-mail atuzzo@littler.com		
12. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.			Tel. No. 414-291-5536	
/s/ Adam-Paul Tuzzo		Adam-Paul Tuzzo		
<i>(signature of representative or person making charge)</i>		<i>(Print/type name and title or office, if any)</i>		
			Cell No. 414-374-3980	
			Fax No. 414-291-5539	
Address <u>111 E. Kilbourn Ave, Suite 1000, Milwaukee, WI 53202</u>			Date <u>4/20/2022</u>	
			e-mail atuzzo@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
Colfax and Milwaukee,
Denver, Colorado

Within the last six months, Workers United, a labor organization which purports to support partners at Starbucks, by and through its agents, has unlawfully restrained and coerced partners in the exercise of their rights guaranteed by Section 7 of the Act and as such have violated Section 8(b)(1) of the National Labor Relations Act.

This unlawful conduct includes, but is not limited to, physically blocking ingress and egress at the store located at 2975 E. Colfax Ave in Denver, Colorado, making threats, bullying, and physically intimidating partners in retaliation for their decision not to support of Workers United's organizing drive, doing the same to customers in retaliation for their continued loyalty to and patronage of the store, yelling profanity and obscenities at partners and/or customers, and/or impacting cars with objects such as a picket sign as they attempted to enter and leave the store property.

The conduct of Workers United and their agents has not only violated the Act, but it has jeopardized physical safety, caused severe emotional distress, and unlawfully interfered with business operations. In order to protect the physical safety and emotional wellbeing of its partners and customers, as well as the Company's legitimate business interests, and to prevent future occurrences of this unlawful conduct by Workers United, Starbucks respectfully requests immediate 10(j) relief.