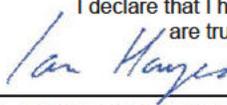


UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 03-CA-298904	Date Filed 7/7/2022

**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. 208-318-2212
	c. Cell No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134  3220 Sheridan Drive, Amherst, NY 14226 / 3611 Delaware Ave, Buffalo, NY 14217	e. Employer Representative Howard Schultz, CEO  (b) (6), (b) (7)(C)  @starbucks.com
	g. e-mail hschultz@starbucks.com
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	h. Number of workers employed 30
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 (list subsections) (3) (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) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	4e. e-mail gbonadomajr@rjrb.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) Workers United, a/w SEIU	
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.	
 <hr/> <i>(signature of representative of person making charge)</i>	Ian Hayes, Attorney <hr/> <i>(Print/type name and title or office, if any)</i>
Hayes Dolce Address 135 Delaware Ave., Ste 502, Buffalo, NY 14202	Tel. No. 716-608-3427  Office, if any, Cell No.  Fax No.
Date July 7, 2022	e-mail ihayes@hayesdolce.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 Employer

### Section 2

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

Employees currently assigned to the store at 3611 Delaware Ave, Buffalo, NY 14217 voted to be represented by the Union, and the Union was certified as their representative on March 17, 2022. The employees are temporarily assigned there pursuant to an effects bargaining agreement the parties made.

Representatives of the Employer, including (b) (6), (b) (7)(C) have engaged in coercive and retaliatory activity, including threatening to discipline employees, penalizing employees by sending them home early, refusing to make minor necessary adjustments to everyday operations, among other conduct. This activity violates the parties effects bargaining agreement and the Act.

The Union seeks expedited injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights.