

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<br>Adecco Staffing, USA, Adecco Group North America, and Modis E&T LLC (single employers), AND Alphabet, Inc. and Google LLC (single employers), all as joint employers and collectively as "the Employer" | b. Tel. No.<br>See Attachment A |
| d. Address (Street, city, state, and ZIP code)<br>See Attachment A   | c. Cell No.                     |
| e. Employer Representative<br>See Attachment A   | f. Fax. No.                     |
|  | g. e-mail                       |
| i. Type of Establishment (factory, mine, wholesaler, etc.)<br>Data Center  | h. Number of workers employed   |
| j. Identify principal product or service   |                                 |

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) 8(a)(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 affecting commerce within the meaning of the Act and the Postal Reorganization Act.

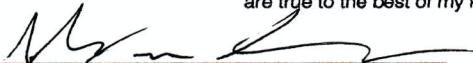
2. Basis of the Charge (*set forth a clear and concise statement of the facts constituting the alleged unfair labor practices*)

- For at least the past six months, the Employer, at its Moncks Corner South Carolina location, has maintained a rule that precludes employees from discussing wages with one another in violation of Section 8(a)(1) of the National Labor Relations Act.
- On or about January 8, 2021, the Employer, through its supervisor [REDACTED], at its Moncks Corner South Carolina location, prohibited employees from discussing wages with one another in violation of Section 8(a)(1) of the National Labor Relations Act.
- On or about January 28, 2021, the Employer, at its Moncks Corner South Carolina location, suspended Elisabeth Shannon Wait for engaging in union and protected concerted activities in violation of Sections 8(a)(1) and (3) of the National Labor Relations Act.

3. Full name of party filing charge (*if labor organization, give full name, including local name and number*)  
CWA Local 1400/Alphabet Workers Union

|   |  |
|---|--|
| 4a. Address (Street and number, city, state, and ZIP code)<br>President Don Tremontozzi,<br>155 West Road<br>Portsmouth, NH 03801 | 4b. Tel. No.<br>(603) 436-4388         |
|   | 4c. Cell No.                           |
|   | 4d. Fax No.<br>(603) 436-2962          |
|   | 4e. e-mail<br>dtrementozzi1400@aol.com |

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*)  
Communications Workers of America, AFL-CIO

|   |  |
|---|--|
| 6. DECLARATION<br>I declare that I have read the above charge and that the statements<br>are true to the best of my knowledge and belief.<br><br><br>(signature of representative or person making charge) | Tel. No.                                   |
| Alex van Schaick, CWA Counsel<br><br>(Print/type name and title or office, if any)  | Office, if any, Cell No.<br>(201) 388-9887 |
|   | Fax No.                                    |
|   | e-mail<br>AvanSchaick@cwa-union.org        |

501 3rd Street, NW, 6th Floor  
Address Washington, DC 20001      Date February 4, 2021

**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 A

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

The following are alleged as joint employers and collectively as "the Employer"

Adecco Staffing, USA, Adecco Group North America, and Modis E&T LLC (single employers)

Corporate Office Address and Contact Information:

10151 Deerwood Park Boulevard

Building 200, Suite 400

Jacksonville, Florida 32256

Phone: 904.360.2000

Fax: 904.360.2110

President Jan Gupta

CEO Corinne Ripoche

Establishment Address and Contact Information:

1699 Garrott Avenue

Moncks Corner, South Carolina 29461-6601

Benjamin Dose, Technical On Site Program Manager

Phone: 712 352-5242

AND Alphabet, Inc. and Google LLC (single employers)

Corporate Address and Contact Information:

1600 Amphitheatre Pkwy

Mountain View, CA 94043

Phone: 650 253-0000

CEO Sindar Pichai