


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

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

**INSTRUCTIONS:**

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Sierra Club	b. Tel. No. 212-602-1748
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 2101 Webster St. Suite 1300 Oakland, CA 94612	e. Employer Representative Nadine Wilburn General Counsel, Labor Relations
	g. e-Mail nadine.wilburn@sierraclub.org
	h. Number of workers employed 946
File Type: <u>ES</u> (Statewide NLRB Regional Director office) or <u>ES-01</u> (NLRB Office) which the alleged unfair labor practice or service is occurring. non-profit conservation/environmental justice	
k. 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) <u>(3) and (5)</u> 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 unfair 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) Since a date within the last six ( 6) months, the Sierra Club, through its officers, agents and representatives:  (1) has retaliated against union members for protected concerted activity by inter alia, terminating union leaders, under the pretext of layoffs, including: Dylan Plummer, Erica Dodt, Zack Gerdes, and Andy Heaslet; and  (2) unilaterally changed terms and conditions of employment by terminating a pregnant employee and union leader, Erica Dodt in violation of the non-discrimination language in the parties' expired CBA.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Progressive Workers Union	
4a. Address (Street and number, city, state, and ZIP code) 50 F Street NW Washington DC 20002	4b. Tel. No. n/a
	4c. Cell No. n/a
	4d. Fax No. n/a
	4e. e-Mail scexcom@pwunion.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) n/a	
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.	
By  (signature of representative or person making charge)	Tel. No. 212-627-8100
Geoffrey Leonard (Print/type name and title or office, if any)	Office, if any, Cell No.
	Fax No.
Address 80 8th Ave. 8th Floor, New York, NY 10011	e-Mail gleonard@levyratner.com
	5/5/2024 (date)

**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 will cause the NLRB to decline to invoke its processes.

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FORM EXEMPT UNDER 44 U.S.C 3512

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