


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 Llama Productions LLC [which is wholly owned by Epic Games, Inc.]	b. Tel. No. <b>Redacted</b> c. Cell No. f. Fax No. g. e-mail <b>Redacted</b> h. Number of workers employed 26
d. Address (Street, city, state, and ZIP code) 209 Orange Street, Wilmington, DE 19801	e. Employer Representative Paul Belica Vice President j. Identify principal product or service Interactive media voice over and other services
i. Type of Establishment (factory, mine, wholesaler, etc.) Entertainment	
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) (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) Within the past six months, the Employer, by its agents and representatives, failed and refused to bargain in good faith with the union by making unilateral changes to terms and conditions of employment, without providing notice to the union or the opportunity to bargain, by utilizing AI-generated voices to replace bargaining unit work on the Interactive Program Fortnite.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Screen Actors Guild – American Federation of Television and Radio Artists	
4a. Address (Street and number, city, state, and ZIP code) 5757 Wilshire Blvd., 7th Floor Los Angeles, CA 90036	4b. Tel. No. <b>Redacted</b> 4c. Cell No. 4d. Fax No. 4e. e-mail <b>Redacted</b>
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. <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">   _____  (signature of representative or person making charge) </div> <div style="text-align: center;"> Evan Hudson-Plush  _____  (Print/type name and title or office, if any) </div> </div>	
Address 909 Third Ave., 12th Floor, New York, NY 10022-4731 Date May 19, 2025	
Tel. No. <b>Redacted</b> Office, if any. Cell No. <b>Redacted</b> Fax No. e-mail <b>Redacted</b>	

**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.