

**IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR HIGHLANDS COUNTY, FLORIDA**

OFFICE OF THE FLORIDA
ATTORNEY GENERAL,

Plaintiff,

v.

Case No.:

STARBUCKS COFFEE COMPANY,

Defendant.

_____/

COMPLAINT AND DEMAND FOR JURY TRIAL

1. All racial discrimination, even for supposedly benign purposes, is invidious and unlawful. *See Students for Fair Admissions v. President and Fellows of Harvard College*, 600 U.S. 181, 206 (2023) (“Eliminating racial discrimination means eliminating all of it.”).

2. Defendant Starbucks Coffee Company, however, has refused to abide by this legal and moral commitment to equality. For the past five years and continuing to the present day, Defendant has excluded or disfavored nonminorities in numerous employment practices and programs.

3. Defendant has: (1) established racial quotas and goals for hiring; (2) paid employees different wages because of their race; (3) tied executive compensation to participation in race-based mentorship programs open only to

persons of certain favored races and race-based retention rates of employees; and (4) excluded people of disfavored races from networking and mentorship opportunities.

4. But civil rights protections extend to everyone—both minorities and nonminorities. *See McDonald v. Santa Fe Trail Transp. Co.*, 427 U.S. 273, 278 (1976); *see also Scholz v. RDV Sports, Inc.*, 710 So. 2d 618, 623 (Fla. 5th DCA 1998 (basketball team’s termination of a white assistant coach violated civil rights laws)).

5. A desire to promote “diversity” does not give Defendant a free pass to discriminate against persons of certain disfavored races (that is, white people,¹ and until last year, multiracial and Asian people).² Doing so violates Florida civil rights law.

PARTIES

6. Plaintiff Attorney General James Uthmeier is the Attorney General and Chief Legal Officer of the State of Florida. *See* Art. IV, § 4(b), Fla. Const.

¹ This isn’t the first time in recent memory that Defendant has faced claims of discrimination for disfavoring nonminority employees. A jury awarded a white employee \$25.6M after finding that Defendant terminated her because of her race. *See* Meredith Deliso, *Starbucks ordered to pay extra \$2.7M to employee who said she was fired for being white*, ABC News, (Aug. 16, 2023) <https://tinyurl.com/d9k48m8t>.

² *See* Bruce M. Anderson, *How Starbucks Achieved 100% Pay Equity by Following These 6 Steps*, LinkedIn.com, Sept. 5, 2019, <https://tinyurl.com/yc55ewnn> (outlining the steps Starbucks has undertaken to achieve these goals).

He is broadly empowered to exercise all powers incidental to his office, *see* § 16.01, Fla. Stat., and is authorized to “commence a civil action” for damages, injunctive relief, and civil penalties of up to \$10,000 per violation if he has “reasonable cause” to conclude that a person or group “[h]as engaged in a pattern or practice of discrimination” or that such discrimination raises “an issue of great public interest.” § 760.021(1), Fla. Stat.

7. Defendant is a for-profit entity that is incorporated in the State of Washington, with its principal place of business at 2401 Utah Ave. South, Seattle, Washington 98134.

8. Defendant has a certificate of status (No. F94000004842) to do business in Florida pursuant to Section 607.0128, Fla. Stat. It employs 381,000 employees nationwide³ and thousands of employees in Florida.⁴ As of July 2025, Defendant operated 934 stores in Florida—the third most of any state in the nation.⁵ Defendant operates at least one store in Highlands County.⁶

³ Bull Fincher, Starbucks Corporation’s Employees Trend, <https://tinyurl.com/39usyujn> (last visited Dec. 7, 2025).

⁴ Cheryl McCloud, *Starbucks closing some locations, cutting 900 jobs. Are any in Florida? What we know*, TALLAHASSEE DEMOCRAT (Sept. 25, 2025), <https://tinyurl.com/bp588hyi> (last visited Dec. 7, 2025).

⁵ *Id.*

⁶ Starbucks.com, *Find a Store*, Highlands County, Florida, <https://tinyurl.com/y3cu7pex> (last visited Dec. 9, 2025).

9. Defendant is an employer engaged in an industry affecting commerce who has 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year. § 760.02(7), Fla. Stat.

JURISDICTION AND VENUE

10. This is an action for declaratory and injunctive relief under the Florida Civil Rights Act for violations of Section 760.10, Fla. Stat.

11. Defendant has implemented its illegal employment policies and practices in its stores nationwide, which includes the 900+ stores it operates in this State as well as the store it operates in Highlands County, Florida.

12. Venue is proper in this Court because Florida law authorizes the Attorney General to file an action alleging a violation of the Florida Civil Rights Act “where the cause of action arises” if he has “reasonable cause” to conclude that either (a) a person or group has engaged in a pattern or practice of discrimination, or (b) a person or group has suffered discrimination and such discrimination raises “an issue of great public importance.” § 760.021(1), (2), Fla. Stat.; *see also id.* § 47.051.

13. Starbucks implements its policies and practices across its stores nationwide, including the store it operates in Highlands County, Florida.

14. As part of his discrimination suit brought under Section 760.021, the Attorney General may seek damages, injunctive relief, civil penalties not to exceed \$10,000 per violation, and any other relief appropriate under Florida law. *Id.* § 760.021. Moreover, any violation of any Florida statute that makes unlawful discrimination because of race in “employment . . . gives rise to a cause of action for all relief and damages described in Section 760.11(5), unless greater damages are expressly provided for.” *Id.* § 760.07.

15. This Court has personal jurisdiction over Defendant under the Florida Civil Rights Act, *see* Section 760.021(1), and Florida’s long-arm statute, *see* Section 48.193(1)(a)1., because Defendant—who is a commercial entity—is engaged in business in the State and is unlawfully discriminating against Florida citizens because of their race.

BACKGROUND

The Florida Civil Rights Act of 1992

16. The Florida Civil Rights Act prohibits employers from “fail[ing] or refus[ing] to hire” an individual, or otherwise discriminating against an individual in their “compensation, terms, conditions, or privileges of employment,” because of their race. § 760.10(1)(a), Fla. Stat.

17. The Act also prohibits employers from limiting, segregating, or classifying employees or applicants for employment based on race in any

manner that would deprive them of employment opportunities. § 760.10(1)(b), Fla. Stat

18. Florida’s civil rights laws are modeled after and interpreted consistently with federal civil rights laws. *See Fla. State Univ. v. Sondel*, 685 So. 2d 923, 925 n.1 (Fla. 1st DCA 1996) (“Federal case law interpreting Title VII . . . is applicable to cases arising under the Florida [Civil Rights] Act”).

19. The U.S. Equal Employment Opportunity Commission, the federal agency tasked with enforcing federal civil rights laws that govern the workplace, instructs employers not to permit “race bias” to influence how they develop hiring or promotion policies, compensation packages, salaries, mentoring opportunities, or trainings. *See* EEOC, Section 15 Race and Color Discrimination, Compliance Manual § 15-VII (B), (Apr. 19, 2006) (“EEOC Race Discrimination Guidance”), available at <https://tinyurl.com/2mmey9nw>.

20. It is the longstanding position of the EEOC and the U.S. Supreme Court that so-called “reverse” discrimination (against a nonminority group) is still discrimination. *See* EEOC, *What You Should Know About DEI-Related Discrimination at Work*, 4., available at <https://tinyurl.com/97pbz863>; *see also McDonald v. Santa Fe Trail Transp. Co.*, 427 U.S. 273, 280 (1976) (holding that Title VII protects all races, including white employees, from employment discrimination and observing that the EEOC “has consistently interpreted

Title VII to proscribe racial discrimination in private employment against whites on the same terms as racial discrimination against nonwhites”).

21. It is unlawful discrimination for an employer to be motivated even in part by race in making an employment decision. EEOC Race Discrimination Guidance, Part 15-V(A)(1); *see also* 42 U.S.C. § 2000e–2(m) (providing for liability “even though other factors also motivated the practice”).

22. Employers cannot justify taking an employment action based on race simply because the employer wants to promote diversity. *See* EEOC, *What You Should Know About DEI-Related Discrimination at Work*, 9., available at <https://tinyurl.com/97pbz863> (“Title VII does not provide any ‘diversity interest’ exception to these rules. Nor has the Supreme Court ever adopted such an exception.”); *see also Taxman v. Bd. of Educ. of the Twp. of Piscataway*, 91 F.3d 1547, 1557-58 (3d Cir. 1996) (holding that school board’s affirmative action plan violated Title VII when it chose to retain a black employee instead of a white employee of equal seniority, ability, and qualifications to promote racial diversity)).

Starbucks’s racially discriminatory practices

23. Notwithstanding State and federal civil rights law, Defendant has openly maintained racially discriminatory employment policies and practices over the past five years.

24. Defendant has admitted on its website and in various public statements that it: (1) hires applicants because of their race, including by establishing hiring quotas and goals based on race; (2) pays employees different wages because of their race or ethnicity; (3) ties executive compensation to those executives' participation in mentorship programs open only to persons of certain favored races and those executives' retention rates of employees who belong to certain favored races; and (4) excludes people of certain races from networking and mentorship opportunities.

25. Defendant also selects suppliers based on race. It has committed to a “supplier diversity goal” of spending \$1.5 billion annually with “diverse” suppliers by 2030. Ex. A at 4. Defendant defines a supplier as “diverse” if the business is 51% owned by persons of a certain sex or sexual orientation, a veteran, a person with a disability, or a person belonging to certain favored races that it lists on its website.⁷

26. Defendant also maintains a racial quota for its board of directors.⁸ It is a member of the Board Diversity Action Alliance, which requires any

⁷ Starbucks, *Supplier Diversity Program*, <https://tinyurl.com/2njsvexu>.

⁸ Starbucks, *Starbucks Equity, Inclusion, and Diversity Timeline*, (October 2020), <https://tinyurl.com/4udknbrs>.

signatory—including Defendant—to “[i]ncrease the number of Black directors on its corporate board of directors to one or more.” Ex. D at 2.

1. Race-based hiring

27. Defendant currently maintains, and has maintained over the past five years, racial preferences in hiring.

28. It announced its “diverse representation goals” in a 2020 public report to hire “people of color” in 40% of retail and distribution center jobs and 30% of corporate jobs by 2025. Ex. A at 27.

29. Lest anyone think that Defendant’s hiring commitments are mere rhetoric, Defendant’s Chief Global Inclusion and Diversity Officer clarified in a 2022 letter that he “pride[s]” himself in his “clear approach” to creating a diverse workplace; namely, that “real inclusion requires intent” when it comes to “ensur[ing] that Starbucks is the . . . most diverse . . . company.” Ex. B at 3.

30. Most recently, in its 2025 Notice of Annual Meeting of Shareholders and Proxy Statement, Defendant disclosed its ongoing goal of increasing the number of “people of color” working in management positions “and above” by at least 1.5 percentage points by fiscal year 2026.⁹

⁹ Starbucks, *2025 Notice of Annual Meeting of Shareholders and Proxy Statement*, Fiscal Year 2024 Annual PRSUs, at 56 (Jan. 24, 2025) <https://tinyurl.com/mwbx7u3x>.

31. Defendant has implemented its race-based hiring policy in its Highlands County store and other stores in Florida

2. Employee compensation based on race

32. In addition to setting numerical targets for hiring based on race, Defendant also sets numerical targets for compensation based on race (and sex), which it describes as “pay equity.”¹⁰ Defendant’s commitment to pay equity also includes altering promotion pay increases based on an individual’s race or other immutable characteristic.¹¹

33. Yet even this discrimination will never be enough. Defendant’s Vice President of Global Talent Acquisition explained in 2024 that Defendant will “never” cease to artificially fix its race-based compensation rates because the “battle” for equity can be “never completely won” due to “those systems and structures and the mental programming” underlying the current systems.¹²

34. On-the-ground testimony confirms Defendant’s public statements. An employee who has worked at one of Defendant’s Florida stores for 17 years contacted the Attorney General in 2024 to inform him that the Defendant pays

¹⁰ Starbucks, *Starbucks Equity, Inclusion, and Diversity Timeline*, (October 2020), <https://tinyurl.com/4udknbrs>.

¹¹ Bruce M. Anderson, *How Starbucks Achieved 100% Pay Equity by Following These 6 Steps*, LinkedIn.com, Sept. 5, 2019, <https://tinyurl.com/yc55ewnn>.

¹² Starbucks, *Starbucks Equity, Inclusion, and Diversity Timeline*, (October 2020), <https://tinyurl.com/4udknbrs>.

employees of certain favored races higher wages than employees belonging to disfavored races who have the same experience and skill.

35. Defendant has implemented its race-based compensation policy in its Highlands County store and other stores in Florida

3. Executive compensation for race-based metrics

36. Defendant enforces its racial targets by tying executive compensation to race-based actions and programming.

37. Prior to March 2024, Starbucks openly conditioned executive bonuses on an executive's ability to meet specific diversity, equity, and inclusion goals.¹³ For FY2024, 7.5% of an executive's compensation depended on (1) an executive "serv[ing] as a mentor to BIPOC [black, indigenous, and people of color]¹⁴ mentees" by leading monthly group meetings with mentees and monthly meetings with individual mentees; and (2) an executive's "BIPOC retention rate," which must be above 87% for the executive to earn at least half of the

¹³ Starbucks, *2024 Notice of Annual Meeting of Shareholders and Proxy Statement*, Inclusion and Diversity Performance Goals (7.5%), at 60 (Jan. 24, 2024), <https://tinyurl.com/mr2wn67c>; *see also* Ex. C at 45 (explaining that Defendant tied 10% of executives' "overall bonus payout calculation" for 2021 to executives' success in "building inclusive and diverse teams").

¹⁴ Defendant didn't define "BIPOC" to include Asian and multiracial persons until as late as 2024.

available bonus amount.¹⁵ So long as a BIPOC employee “remained employed with Starbucks,” though “not necessarily” in the executive’s organization, that executive would still get credit for retaining that BIPOC employee.¹⁶

38. For 2025, Defendant has changed how it describes its requirements for executive compensation. The executive compensation program no longer explicitly refers to diversity goals.¹⁷ Instead, Defendant conditions executive compensation on executives meeting a “belonging” goal and replaced the word “representation” with “talent” to “provide for different representation improvement targets.”¹⁸

39. Nevertheless, Defendant still ties executive compensation to numerical target based on race in 2025: to receive their full compensation, executives must increase the number of “people of color” working in management positions by at least 1.5 percentage points by fiscal year 2026.¹⁹

¹⁵ Starbucks, *2024 Notice of Annual Meeting of Shareholders and Proxy Statement*, Inclusion and Diversity Performance Goals (7.5%), at 60 (Jan. 24, 2024), <https://tinyurl.com/mr2wn67c>.

¹⁶ *Id.*

¹⁷ Farient Advisors, *A Sign of the Times: Starbucks Drops ‘DEI,’ Favors ‘Talent,’* March 26, 2024, <https://tinyurl.com/mszb4vp4>.

¹⁸ *Id.*

¹⁹ Starbucks, *2025 Notice of Annual Meeting of Shareholders and Proxy Statement*, Fiscal Year 2024 Annual PRSUs, at 56 (Jan. 24, 2025) <https://tinyurl.com/mwbx7u3x>.

40. Defendant has implemented this policy in its Highlands County store and other stores in Florida

4. Racially exclusive networking and mentorship opportunities

41. In its 2021 Global Environmental and Social Impact Report, Defendant touted that it was “launching” a mentorship program that would “connect” employees with “senior leaders,” first “[b]eginning with [its] BIPOC” employees.”²⁰

42. Later, in its 2024 Notice of Annual Meeting of Shareholders and Proxy Statement, Defendant describes mentorship programs that it explicitly states are open to persons of certain favored races—specifically “Black, Indigenous, and People of Color.”²¹

43. Defendant’s commitment to racial segregation came at the same time shareholders requested that Defendant create an audit and report to determine whether Defendant’s programs and practices direct “systemic discrimination” against “‘non-diverse’ employees.”²² The proposal explained that Defendant devoted “significant resources and attention” to creating

²⁰ Ex. C at 16.

²¹ Starbucks, *2024 Notice of Annual Meeting of Shareholders and Proxy Statement*, Inclusion and Diversity Performance Goals (7.5%), at 60, (Jan. 24, 2024), <https://tinyurl.com/mr2wn67c>.

²² *Id.* at 98.

mentorship and networking opportunities to bring together people with “shared identities” to establish a “culture of inclusion,” but the shareholders argued that all those groups actually achieve is “exclusivity.”²³ As evidence of this, the shareholders noted that Defendant only has one group not based on race or identity (a “performance” group), and Defendant has “no” networking groups for “any ‘non-diverse’ groups.”²⁴ Defendant’s Board voted against the proposal.²⁵

44. In addition, Florida residents employed by, or who applied to work for, Defendant at Florida stores contacted the Attorney General last year and reported that they felt or were excluded, and even suffered humiliation, because they are white.

45. Defendant has implemented its mentorship and networking policies in its Highlands County store and other stores in Florida.

**Defendant’s pattern or practice of discrimination
harms the State and its residents**

46. Defendant’s reverse discrimination *is still discrimination*. The law is clear that “[e]mployers cannot permit race bias to affect work assignments, performance measurements, pay, training, mentoring or networking,

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.* at 16.

discipline, or any other term, condition, or privilege of employment.” EEOC Race Discrimination Guidance, Part 15-VII(B). That is precisely what Defendant is doing.

47. Unsurprisingly, Defendant’s racist policies and practices have caused financial, moral, and emotional harm to Florida residents each time Defendant: has refused to hire a person because he or she belongs to a disfavored race; has compensated a person at a lower rate solely or in part due to that person belonging to a disfavored race; has conditioned executive compensation on an executive participating in Defendant’s racist and exclusionary mentorship programs or on an executive making employment decisions designed to retain certain employees because of those employees’ race; and creating mentorship or networking opportunities limited to people of favored races.

48. As Defendant operates 900+ stores in the State, the number of instances in which Defendant has taken an adverse action against a Florida resident due to a resident’s race is foreseeably numerous and significant, and thus, Defendant’s discriminatory employment practices raise an “issue of great public importance,” both because of the sheer volume as well as the massive geographical scope of Defendant’s discrimination. § 760.021(1), Fla. Stat.

49. Moreover, Florida residents have contacted the Attorney General to report that the Defendant's race-based practices caused them humiliation, reduced their compensation, exposed them to a hostile work environment, or inflicted on them other harms because of their race.

50. Defendant's racist employment actions have caused significant financial losses and damages to Florida residents. Taken all together, those damages amount to millions of dollars, because Defendant's racial employment policies, implemented in 900+ stores across the State, have caused a vast number of Florida residents to be unable to begin working for Defendant, caused others to be fired, denied promotions, paid at a reduced rate of compensation, denied bonuses, and denied opportunities for mentorship and networking because of their race.

51. And more generally, Defendant's discriminatory policies and practices impose substantial harm to Florida's economy, which harms the State directly. *See Alfred L. Snapp & Son, Inc. v. Puerto Rico ex rel. Barez*, 458 U.S. 592, 601 (1982).

COUNT I

(Claim by Plaintiff Against Defendant for Violation of Florida Civil Rights Act – Race Discrimination)

52. The Attorney General realleges and incorporates, as though fully set forth, paragraphs 1–51 of this complaint.

53. Defendant has implemented employment policies that favor persons belonging to only certain favored races—in other words, Defendant has engaged in discrimination against persons belonging to non-favored races—namely, white, Asian, and multiracial people.

54. Because employment opportunities are often concrete and limited (for example, there are usually a set number of positions available in a given store), Defendant must necessarily refuse to hire or promote persons under its policies and practices because they belong to a disfavored race; compensate persons at a lower rate solely or in part due to them belonging to a disfavored race; condition executives' compensation on an executive participating in Defendant's racist and exclusionary mentorship programs or on an executive making employment decisions designed to retain certain employees because of those employees' race; and create mentorship or networking opportunities limited only to people of favored races.

55. Florida residents have contacted the Attorney General and reported that Defendant paid them and their white coworkers lower wages because of

their race, refused to hire them or promote them because of their race, created a hostile work environment in which Florida residents felt humiliation, and were excluded from certain mentorship or networking programs because of their race.

56. Therefore, Defendant has “fail[ed] or refus[ed] to hire” an individual and “otherwise discriminated against an individual” in their “compensation, terms, conditions, or privileges of employment,” because of that individual’s race. § 760.10(1), Fla. Stat.

57. Defendant has also published a “notice . . . relating to employment” that “indicat[es]” a “preference . . . based on race.” § 760.10(6), Fla. Stat.

58. Defendant’s discriminatory policies and practices constitute “a pattern or practice of discrimination” as defined by the Florida Civil Rights Act, as well as “an issue of great public interest.” § 760.021(1)(a), (b), Fla. Stat.

PRAYER FOR RELIEF

Wherefore, the Attorney General requests that the Court:

A. Declare that Defendant’s race-based hiring, race “pay equity” policies, race-based executive compensation, and race-based mentorship and networking programs, and hostile work environment constitute racial discrimination in violation of Section 760.10, Fla. Stat.

B. Permanently enjoin Starbucks from disfavoring employees or applicants because of their race, skin color, or ethnicity, including by enjoining Starbucks from: (1) hiring applicants based on their race or ethnicity; (2) paying employees different wages based on their race or ethnicity; (3) tying executive compensation to those executives' participation in mentorship programs open only to persons of certain favored races and those executives' retention rates of employees who belong to certain favored races; and (4) excluding people of certain races from networking and mentorship opportunities.

C. Award civil penalties of \$10,000 for each instance of racial discrimination that Starbucks is committing or has committed against a Florida resident, which the Attorney General currently estimates amounts to at least in the tens of millions, if not more, as Defendant operates 900+ stores in the State and the Attorney General is authorized to see a civil penalty for each violation. § 760.021, Fla. Stat. ("The Attorney General may commence a civil action for . . . civil penalties not to exceed \$10,000 *per violation*) (emphasis added).

D. Award affirmative relief and damages, including compensatory damages for the mental anguish, loss of dignity, and other intangible injuries that Defendant's discriminatory practices have caused to Florida residents;

punitive damages, for current and past acts of discrimination; and costs and reasonable attorney's fees. § 760.11(5), Fla. Stat.

E. Grant such other relief the Court deems equitable and just.

DEMAND FOR JURY TRIAL

Pursuant to Florida Rule of Civil Procedure 1.430, the Attorney General demands trial by jury of all issues properly triable to a jury in this case.

Dated: December 10, 2025

Respectfully submitted,

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