The United States requests, pursuant to Article 31-A.4.2 of the United States-Mexico-Canada Agreement (USMCA), that Mexico conduct a review of whether a Denial of Rights is occurring at a facility operated by Madobox, S.A. de C.V. (the Company), located in the city of Uruapan in the state of Michoacán, Mexico (the Facility). As defined in USMCA Article 31-A.2, a Denial of Rights occurs when workers are being denied the right of free association and collective bargaining under laws necessary to fulfill a Party's obligations under the USMCA.

The United States is concerned that workers at the Facility are being denied the right of freedom of association and collective bargaining as a result of interference by the Company in workers' "concerted activities for collective bargaining or protection and to organize, form, and join the union of their choice" and acts of "employer domination or interference in union activities, discrimination, or coercion against workers for union activity or support."[1]

This request for review encompasses all actions taken by the Company to intervene in, interfere with, or prevent workers from exercising their freedom of association and engaging in collective bargaining activities at the Facility, including through interference with their union activity by purporting to enter into a collective bargaining agreement at the facility with a union that had not obtained titular status, by misinforming workers about unions at the facility, and by unlawfully dismissing workers because of their union activity.

The actions encompassed by this request for review include any action or inaction by the Company, through their employees, representatives, or agents, acting individually or in coordination with third parties.

If Mexico were to determine that there is a Denial of Rights, the United States further requests, pursuant to USMCA Article 31-A.4.2, that Mexico attempt to remediate any such violation within 45 days of this request.

We look forward to receiving Mexico's notification of whether it intends to conduct the requested review.[2]

[1] USMCA Article 23-A.2(a).

[2] USMCA Article 31-A.4.2 ("The respondent Party shall have 10 days to notify the complainant Party as to whether it intends to conduct a review.").