

# 2024 Annual Report

## Office of Labor-Management Standards

U.S. Department of Labor  
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## Introduction

Since before the founding of the United States, labor unions have performed an essential function in the American economy by providing a voice for workers in their workplace. Today, unions continue to have a critical impact on American workers and consumers. Unions do this by negotiating and enforcing agreements with employers to promote employee safety, equitable workplace policies, and fair pay. Labor unions advance the economic aspirations of their members, those in the middle class, and those aspiring to reach the middle class. They promote equity among diverse communities by closing wage gaps that divide the nation by race, gender, and ethnicity. We have seen labor unions in the forefront of the movement for social justice, promoting benefits for their members – the forty-hour week and overtime pay, retirement security and health insurance, to name just a few – long before these benefits were embodied in national and state laws. Unions continue to lead the way by advancing benefits such as paid family and sick leave for their members, even as those benefits remain elusive as a matter of federal policy. In 2024, the labor movement remains strong, with unions organizing workers at employers and in industries previously not unionized and through historic advancements in wages, benefits and working conditions for workers who have long been represented by unions.

The successful advancement of the Office of Labor-Management Standards (OLMS) mission helps unions achieve their goals for workers. OLMS is tasked with protecting unions and their members by administering the Labor-Management Reporting and Disclosure Act (LMRDA) and related laws. OLMS protects labor organizations and their membership by promoting financial integrity through its compliance audit and criminal enforcement programs. It promotes transparency by requiring and reviewing union, employer, and persuader reports for accuracy and making them available to the public. Finally, OLMS conducts investigations of complaints filed by members concerning regularly scheduled union officer elections and trusteeships to protect the democratic process in the election of union leaders. Unions are strong when they operate democratically, are protected against becoming victims of financial crimes and mismanagement, and are transparent in their operations. OLMS' work and mission promotes strong, democratic, and transparent unions so they may have the full confidence of workers, employers, and policy makers.

By taking policy actions, discussing the benefits that labor unions offer, enforcing reporting of anti-union employer conduct, contextualizing labor union enforcement data with employer enforcement data, and modernizing its website so its work may be easily accessed, the OLMS mission strengthens unions, enabling the labor movement to contribute to the hard work of creating greater equity and economic security for all workers. This report for fiscal year 2024 (October 1, 2023 through September 30, 2024), by its very nature, highlights the instances when unions and their officers or employees failed to live up to the standards set for them. But the exception proves the rule – while some modest number of unions

and union officers fall short of our expectations, the vast majority do their work faithfully and without incident.

## The Law

When the [LMRDA](#) was enacted in 1959, Congress reiterated what it had found in 1935 when it enacted the National Labor Relations Act, stating that “in the public interest, it continues to be the responsibility of the Federal Government to protect employees’ rights to organize, choose their own representatives, bargain collectively, and otherwise engage in concerted activities for their mutual aid or protection[.]” To help achieve that end, Congress declared that “it is essential that labor organizations, employers, and their officials adhere to the highest standards of responsibility and ethical conduct in administering the affairs of their organizations, particularly as they affect labor-management relations.” The LMRDA primarily promotes union democracy and financial integrity in private sector labor unions through standards for union officer elections and union trusteeships and safeguards for union assets. Additionally, the LMRDA promotes transparency through reporting and disclosure requirements for labor unions, union officials, employers, labor relations consultants, and surety companies. OLMS continues today to protect union members and their right “to organize, choose their own representatives, bargain collectively, and otherwise engage in concerted activities for their mutual aid or protection” by pursuing this important mission through criminal and civil enforcement of the LMRDA.

The major provisions of the LMRDA cover, by title:

- Title I: Bill of Rights for union members
- Title II: Requirements for reporting and disclosure by labor unions, union officers and employees, employers, labor relations consultants and surety companies
- Title III: Rules for establishing and maintaining trusteeships
- Title IV: Standards for conducting fair elections of union officers
- Title V: Safeguards for protecting union funds and assets

Unions representing U.S. Postal Service employees became subject to the LMRDA with the passage of the Postal Reorganization Act of 1970. OLMS also administers provisions of the Civil Service Reform Act of 1978 and the Foreign Service Act of 1980, which extend comparable protections to labor unions representing federal employees.

OLMS is the front-line agency responsible for safeguarding union assets, promoting democracy by enforcing the LMRDA through its criminal and civil investigations, and creating transparency including employer efforts to persuade workers on how to exercise their rights protected by federal labor laws. OLMS’ criminal work includes investigations of possible embezzlement, deprivation of rights by violence, extortionate picketing, willful failure to file reports, destruction of records, filing false reports and fraud related to union elections. It also includes the prohibition of convicted persons from holding union office or employment or holding any position with an employer or an association of employers in which they have “specific collective bargaining authority or direct responsibility in the area of labor-management relations[.]” Civil investigations include those concerning violations of the LMRDA involving union election procedures, union, employer, and consultant financial disclosure requirements, and trusteeship standards. OLMS also conducts audits of union finances.

Compliance assistance plays a major role in OLMS enforcement strategy. OLMS has an active compliance assistance program to promote voluntary compliance with the LMRDA by informing union officers and employees as well as employers and employer-consultants of their responsibilities and informing members of their legal rights.

In addition to the LMRDA, OLMS administers the Department's responsibilities under the Federal Transit Act by ensuring that fair and equitable arrangements protecting mass transit employees' collective bargaining rights are in place before the release of federal transit grant funds.

## Summary

This report consists of six sections, with related tables and charts.

- Section 1 presents key fiscal year (FY) 2024 criminal enforcement and performance results regarding LMRDA Title V (financial safeguards for labor organizations) together with noteworthy criminal enforcement actions. A complete listing of calendar year (CY) [2024](#) criminal actions is located on the OLMS website along with those for [previous](#) calendar years.
- Section 2 presents key FY 2024 civil enforcement and performance results regarding LMRDA Title III (trusteeships) and Title IV (union officer elections) together with noteworthy union officer election case summaries for FY 2024. A listing of all CY [2024](#) voluntary agreements for OLMS-supervised union officer elections is located on the OLMS website along with those for previous [years](#). Calendar year [2024](#) court actions resulting from election investigations are located on the OLMS website along with those for previous [years](#). Final decision letters in election and trusteeship cases are located on the OLMS website in the [FOIA reading room](#). As with OLMS' criminal enforcement activities, it bears noting that, of the over 6,800 union officer elections estimated to have taken place in 2024, members filed viable complaints in only 112 elections, and OLMS found a basis for seeking a new election in only 21 of those. Regarding trusteeships, reports were filed reflecting 75 subordinate bodies (local or intermediate unions) having been placed under trusteeship in FY 2024. OLMS processed 24 trusteeship cases, including those based on failure to report, deficient report, and based on complaints received.
- Section 3 presents reporting and disclosure data and related program activity pursuant to LMRDA Title II (reporting requirements). Section 3 also presents key FY 2024 reporting, enforcement and performance results. Reports are available for public disclosure on the [OLMS Online Public Disclosure Room](#).
- Section 4 summarizes grant certification activity pursuant to the section 13(c) program, which ensures fair and equitable arrangements protecting the collective bargaining rights and agreements for mass transit employees, as required by the Federal Transit Act.
- Section 5 briefly describes compliance assistance activities conducted in FY 2024.
- Section 6 discusses OLMS outreach efforts undertaken in FY 2024.

OLMS [Annual Reports for 2004–2023](#) are located on the OLMS website.

# Program Activities

## 1. Safeguarding Union Assets

As part of the effort to protect and safeguard the union funds and assets belonging to hard-working union members, OLMS investigates possible embezzlement from unions and other violations of criminal laws. Union officers, employees, and representatives have a duty to manage the funds and property of the union solely for the benefit of the union and its members in accordance with the union's constitution. While most union officers and employees do their work diligently and without incident, criminal violations do occur and, when they do, the union is the victim. When a union officer or employee violates their position of trust by embezzling or misappropriating union funds or assets, they commit a federal crime punishable by imprisonment, fine, or both. OLMS is responsible for investigating these crimes.

Further, Section 504 of the LMRDA prohibits individuals convicted of certain crimes from holding union office or employment or serving in other specified capacities with both unions and employers. The bar runs for 13 years after conviction or after the end of imprisonment, whichever is later. OLMS is responsible for investigating violations of section 504 in addition to other violations including embezzlements of union funds and the willful failure to file complete and accurate financial and other reports with OLMS or to maintain records. These investigations may result in legal enforcement actions.

OLMS monitors activities involving union funds to help safeguard these funds from criminal conduct. There are over 20,000 unions that file reports with OLMS and, among those unions, approximately 200,000 elected officers and employees. During the past five years, OLMS has averaged more than 185 criminal investigations annually. In FY 2024, OLMS criminal investigations resulted in 56 individuals being convicted of various crimes. While many of those convicted were union officers or employees, others were not. Of the 56 convictions reported in 2024, five were employers.

Through its Compliance Audit Program (CAP), OLMS conducts audits of labor unions, to promote compliance with the LMRDA and to detect possible embezzlements. This effort extends to every level of labor organizations, from local unions to intermediate bodies, to national and international unions. OLMS conducts compliance audits of unions covered by the LMRDA and of Federal sector unions under the standards of conduct provisions of the Civil Service Reform Act (CSRA). Compliance audits also are designed to detect potential civil violations of the law, and to provide compliance assistance to help unions meet statutory requirements. When OLMS discovers a violation during an audit, it attempts to enable the labor union to remedy the problem by providing on-the-spot compliance assistance before the audit concludes. For example, if a compliance audit reveals that a union carries insufficient bonding to protect its financial operations from fraud or embezzlement, OLMS will direct the union to bring its bonding level to statutory standards. Once a compliance audit is completed, OLMS sends a closing letter to the union describing any reporting deficiencies, recordkeeping violations, and internal control problems identified during the audit. Compliance audit closing letters are located on the [OLMS website](#). If the violation has not been voluntarily remedied by the conclusion of the audit, OLMS will open a "fall-out" case to obtain compliance. This case will focus on investigating and abating the remaining violation(s). As a new priority performance goal, OLMS worked to increase the percentage of violations uncovered during compliance audits that were

resolved through voluntary compliance prior to closing an audit. In FY 2024, OLMS exceeded its performance goal of closing 73% of violations found during audits before closing the audit by resolving 83.3% of violations through voluntary compliance.

<b>OLMS Performance Goal – Financial Integrity</b>	<b>FY 2024 Target</b>	<b>FY 2024 Results</b>
Increase the percentage of violations resolved through voluntary compliance	73%	83.3%

<b>OLMS Enforcement Statistics – Financial Integrity</b>	<b>FY 2024 Plan</b>	<b>FY 2024 Results</b>
Investigations Criminal Completed	177	177
Indictments	60	47
Convictions	60	56
Compliance Audits Conducted	284	236

Below are summaries of several notable cases resulting from OLMS criminal investigations during FY 2024:

**Former Union Officer Sentenced for Wire Fraud Tied to Embezzling Over \$126,000**

On October 5, 2023, in the United States District Court for the Southern District of Ohio, Eastern Division, Fred T. Lee, former President of American Federation of Government Employees Local 4071, located in Columbus, Ohio, was sentenced to one year of supervised release and ordered to pay \$126,872 in restitution. On April 10, 2023, Lee pleaded guilty to wire fraud, in violation of 18 U.S.C. 1343. Although the union had a program to issue recruitment rebates and provided some rebates in cash, Lee withdrew an additional \$126,872 in cash from the union account for his own personal use by making 140 ATM withdrawals, 30 unauthorized counter withdrawals, and receiving 6 unauthorized checks. The joint investigation was conducted with the Department of Veterans Affairs’ Office of Inspector General.

**Former ILA Local 1740 President and Other Individuals Sentenced for Crimes Impacting the Union in the Port of San Juan, Puerto Rico**

In FY 2024, a joint investigation of International Longshoremen’s Association (ILA) Local 1740, located in the Port of San Juan, San Juan, Puerto Rico, produced multiple criminal convictions in the United States District Court for the District of Puerto Rico. Carlos Sanchez Ortiz, former President of ILA 1740 and a former Vice President of the ILA International, pleaded guilty to one count of labor racketeering conspiracy (RICO Act), in violation of 18 U.S.C. 1962(d). ILA 1740 members Pedro Pastrana Gonzalez and Iara Clemente Rivera, as well as Jorge Batista Maldonado, a supervisor of the Puerto Rico Port Authority, also pleaded guilty to labor racketeering conspiracy. In their plea agreements, Sanchez Ortiz, Pastrana Gonzalez, and Clemente Rivera admitted that they participated in a scheme to collect unlawful payments from shipping companies at the piers, and that those unlawful payments were concealed in part through a company called “JCPY,” which Pastrana Gonzalez admitted to being the president of since 2012. Members of the enterprise threatened these union employers with

economic harm by threatening to use picket lines to block cargo if the unlawful fees were not paid. Batista Maldonado admitted to providing information and advice to the enterprise.

During November and December 2023, the four individuals were sentenced. Pastrana Gonzalez was sentenced to 21 months of imprisonment, one year of supervised release, and he was ordered to pay \$242,042 in restitution. Clemente Rivera was sentenced to three years of probation and ordered to pay \$150,000 in restitution. Sanchez Ortiz was also sentenced to three years of probation and ordered to pay \$10,000 in restitution. Batista Maldonado was sentenced to two years of probation and ordered to pay \$50,000 in restitution. In addition, several other ILA 1740 union members were sentenced to probation following their guilty pleas for conspiracy to convert funds and falsify the records of an ILA Local 1740 benefit fund, in violation of 18 U.S.C. 371. The joint investigation was conducted with the Department of Labor's Employee Benefits Security Administration and Office of Inspector General, the Federal Bureau of Investigation, and the U.S. Attorney's Office for the District of Puerto Rico.

### **Former Union Officer Sentenced for Embezzling Approximately \$100,000**

On November 29, 2023, in the United States District Court for the Northern District of Alabama, Ray La Vondie Williams, former Financial Secretary of United Steelworkers Local 9-2140-S, located in Birmingham, Alabama, was sentenced to three years of probation and ordered to pay \$68,325 in restitution. On June 27, 2023, Williams pleaded guilty to embezzling approximately \$100,000 in union funds, in violation of 29 U.S.C. 501(c), previously refunding the union \$32,774 prior to sentencing. The OLMS investigation found that while Williams served as the union financial secretary, he converted the funds to his personal use by making unauthorized purchases using the union's debit card and unauthorized withdrawals at the local's bank. He also initiated and received unauthorized transfers from the union's account to his personal bank account via the Zelle App and via the union's electronic banking account to check.

### **Two Former Union Officers Found Guilty of Embezzlement at Trial and Sentenced to Prison, Several Former Union Employees Also Convicted**

In FY 2024, a long-term joint investigation of International Brotherhood of Electrical Workers (IBEW) Local 98, located in Philadelphia, Pennsylvania, produced numerous criminal convictions in the United States District Court for the Eastern District of Pennsylvania. In December 2023, John Dougherty and Brian Burrows, former IBEW Local 98 Business Manager and former Local 98 President, respectively, were found guilty following a jury trial of conspiracy to embezzle from a labor union and employee benefits plan, embezzlement of union funds, filing false LM reports, falsifying union records, and filing false federal income tax returns, in violation of 18 U.S.C. 371, 29 U.S.C. 501(c), 29 U.S.C. 439(b), 29 U.S.C. 439(c), and 26 U.S.C. 7206(1), respectively. Dougherty was also found guilty of wire fraud, in violation of 18 U.S.C. 1343. Dougherty was previously found guilty following a November 2021 public corruption trial along with co-defendant Robert Henon, a former employee of Local 98 and a Philadelphia City Councilman, for conspiracy to commit honest services fraud and honest services wire fraud, in violation of 18 U.S.C. 371 and 18 U.S.C. 1343 and 1346, respectively. Henon was also convicted of bribery, in violation of 18 U.S.C. 666 (a)(1)(B).

On June 26, 2024, Burrows was sentenced to 48 months of imprisonment, three years of supervised release, and he was ordered to pay \$135,689 in forfeiture. Burrows was later ordered to pay \$926,133 in restitution and \$10,357 to the Internal Revenue Service (IRS). On July 11, 2024, Dougherty was sentenced to 72 months of imprisonment, three years of supervised release, and 100 hours of

community service. He was also ordered to pay forfeiture of \$353,941. Dougherty was later ordered to pay more than \$1.6 million in restitution (jointly and severally with his co-conspirators) to Local 98 and approximately \$126,000 to the IRS.

Additionally, four other former Local 98 employees were sentenced this year, following guilty pleas for embezzlement and related crimes. They were collectively ordered to pay \$128,503 in restitution. The joint investigation was conducted with the Department of Labor's Employee Benefits Security Administration and Office of Inspector General, the Federal Bureau of Investigation, the IRS, the Pennsylvania State Police, and the Pennsylvania Attorney General's Office.

### **Former Union President and Benefits Coordinator Sentenced to Prison for Defrauding and Misappropriating from Union Member Annuity Funds**

On January 17, 2024, in the United States District Court for the Southern District of New York, Kenneth Wynder Jr., former President of the Law Enforcement Employees Benevolent Association (LEEBA), located in New York, New York, was sentenced to 40 months in prison followed by three years of supervised release. Wynder was ordered to pay \$838,683 in restitution and \$529,000 in forfeiture. On the same date, Andrew Brown, the union's former Benefits Coordinator, was sentenced to 18 months in prison followed by three years of supervised release and ordered to pay \$529,000 in restitution as well as \$3,049 in forfeiture.

On May 30, 2023, following a five-day jury trial, Wynder and Brown were both convicted of wire fraud and conspiracy to commit wire fraud, in violation of 18 U.S.C. 1343 and 1349, respectively. Wynder was also convicted of conspiracy to evade federal taxes and federal tax evasion, in violation of 26 U.S.C. 7201. Wynder and Brown participated in a scheme to embezzle money from the annuity fund and individual members' retirement accounts. Specifically, they made hundreds of thousands of dollars in fraudulent transfers from the annuity fund to LEEBA's operating account, which Wynder controlled. Wynder then regularly used those funds to enrich himself at the union members' expense, including through unauthorized and excessive checks to himself, cash withdrawals for his own benefit, and to pay insurance benefits for which Brown received commissions. In addition, Wynder caused the union to pay for various personal expenses, such as the purchase of a Lexus automobile and personal travel expenses, all paid for by the union and none of which was contemporaneously reported to the Internal Revenue Service (IRS). The joint investigation was conducted with the Federal Bureau of Investigation and the IRS – Criminal Investigations.

### **Former Union Official Sentenced for Embezzling Over \$70,000**

On February 15, 2024, in the United States District Court for the Eastern District of Wisconsin, Marie "Malou" Noth, former Deputy Administrator of the trusteeship imposed on American Federation of State, County and Municipal Employees Local 777, located in Milwaukee, Wisconsin, was sentenced to two years of supervised release and ordered to pay \$70,900 in restitution. On November 15, 2023, Noth pleaded guilty to embezzling union funds, in violation of 29 U.S.C. 501(c). The OLMS investigation found that between January 2016 and September 2019, Noth used her access to the union's bank account to make unauthorized ATM and counter cash withdrawals. She also wrote unauthorized union checks to cash, unauthorized union checks to herself, and unauthorized union checks to third parties (including friends and family). Noth also made unauthorized electronic fund transfers. At times, Noth attempted to conceal her fraudulent activity by altering checkbook carbon

copies to hide the checks' true payees and writing false union business purposes on the memo line of some checks.

**Former Union Officer Sentenced for Wire Fraud Tied to Embezzling Over \$55,000**

On March 25, 2024, in the United States District Court for the District of Arizona, Elizabeth Dawn Talavera, former Secretary-Treasurer of American Federation of Government Employees Local 3694, located in Waddell, Arizona, was sentenced to four years of probation and ordered to pay \$55,766 in restitution. On October 31, 2023, Talavera pleaded guilty to one count of wire fraud, in violation of 18 U.S.C. 1343. The OLMS investigation found that Talavera used her access to the union's internet banking account to conduct wire transfers from the union's checking account to herself, a family member, and friends. Talavera also fraudulently used the union's debit card to make cash withdrawals and personal purchases. Additionally, Talavera generated checks from the local funds to herself, as well as diverted dues checks for the union into her personal bank account instead of the union's account, solely for her own personal benefit.

**Former Union Employee Sentenced for Embezzling Over \$189,000 and Wire Fraud**

On July 16, 2024, in the United States District Court for the District of Oregon, Emerald Keever, former bookkeeper for Sheet Metal, Air, Rail and Transportation Workers Local 16, located in Portland, Oregon, was sentenced to three years of supervised release. She was also ordered to pay restitution totaling \$189,119. On April 16, 2024, Keever pleaded guilty to wire fraud and embezzling union funds, in violation of 18 U.S.C. 1343 and 29 U.S.C. 501(c), respectively. The OLMS investigation found that Keever redirected union money to her personal accounts in several ways. First, on multiple occasions Keever excluded herself from a list of payees that the union management reviewed so that she could separately pay her more than she was authorized to receive. Second, Keever added a second bank account to her payee profile so that she could receive additional payroll payments. Third, Keever created false payment entries to vendors to conceal unauthorized payroll disbursements to her, to which she was not entitled.

**Former Union Officer Sentenced for Felony Theft of Property**

On July 31, 2024, in the Washington County Circuit Court in the State of Arkansas, Thomas Hill, former Treasurer of National Association of Letter Carriers State Association, located in Fayetteville, Arkansas, pleaded guilty to one count of felony theft of property, in violation of Arkansas Code Annotated 5-36-103(b)(1)(A). He was then sentenced to 20 years of unsupervised probation and ordered to pay \$82,204 in restitution. The joint investigation conducted with the Fayetteville Police Department found that between February 2016 and February 2023, Hill fraudulently wrote himself numerous unauthorized checks and illicitly used the union's debit card to make unauthorized charges and cash withdrawals.

**Former Union Officer Sentenced to Prison for Embezzling \$129,000**

On August 21, 2024, in the United States District Court for the District of Kansas, Randal Dunlap, former Treasurer of National Association of Letter Carriers Branch 1018, located in Manhattan, Kansas, was sentenced to 13 months of imprisonment and two years of supervised release. He was also ordered to pay \$129,000 in restitution. On May 1, 2024, Dunlap pleaded guilty to embezzling union funds, in violation of 29 U.S.C. 501(c). The OLMS investigation found that in 2007, Dunlap obtained a debit card attached to the union's bank without the knowledge of other officers. Between 2007 and 2023, he used the card to make over \$100,000 in ATM cash withdrawals and personal debit card



purchases. In addition, he used his position as treasurer to write over \$40,000 in checks to himself or to cash without the approval of other officers. To conceal his actions, Dunlap falsified the balance of Branch 1018’s checking account in financial reports to the union’s membership and in the union’s annual budget reports.

## 2. Protecting Union Democracy

Title IV of the LMRDA establishes standards for conducting democratic and fair union officer elections, such as the frequency and method of election, the right of members in good standing to be candidates, rights of candidates, and member voting rights. While the vast majority of union officer elections are held without protest, OLMS investigates properly filed complaints protesting union officer elections. Before filing a complaint with OLMS, union members must avail themselves of their union’s internal protest procedures. If OLMS’ investigation reveals a violation of Title IV of the LMRDA that may have affected the outcome of the election, OLMS seeks a voluntary compliance agreement with the union to allow OLMS to supervise a new election. If the union does not voluntarily agree to remedy the violation, OLMS takes legal action seeking to void the challenged election and conduct a new election supervised by OLMS.

OLMS seeks to improve timely resolution of union officer election complaints, which is measured by the average number of elapsed days between OLMS’ receipt of a complaint and OLMS’ resolution. The timely resolution of complaints is an important objective, as it removes the uncertainty and disruption that might arise from stale claims that an election was not fair. In FY 2024 OLMS improved its elapsed time performance goal from that achieved in FY 2023 and only narrowly missed its goal of 65 average elapsed days. The average number of elapsed days to resolve union officer election complaints during the year was 66.3 days. OLMS tracks the number of election investigations and supervised elections, both of which are dependent upon the number of election complaints it receives. OLMS does not project or estimate the number of lawsuits filed or voluntary compliance agreements obtained in a year, given that the number of these actions is largely out of OLMS’ control.

Under Title III of the LMRDA, the agency also conducts investigations to determine the validity of the imposition or continuation of trusteeships imposed by national and international unions on subordinate bodies. Trusteeship investigations are conducted upon receipt of a complaint from a member or subordinate body. Unlike with election investigations, union members need not avail themselves of their union’s internal protest procedures before filing a complaint with OLMS.

<b>OLMS Performance Goal – Union Democracy</b>	<b>FY 2024 Target</b>	<b>FY 2024 Results</b>
Number of Days to Resolve Election Complaints	65	66.3

<b>OLMS Enforcement Statistics – Union Democracy</b>	<b>FY 2024 Plan</b>	<b>FY 2024 Results</b>
Election Investigations Conducted	92	112
Lawsuits Filed	N/A	2
Voluntary Compliance Agreements Obtained	N/A	19

Supervised Elections Completed	22	17
Trusteeship Investigations	19	24

In FY 2024, while unions held an estimated 6,800 elections, OLMS received and processed only 112 election complaints. Although election complaints filed in FY 2024 may have concerned elections held in prior years, the numbers nevertheless indicate that only about 1.64 percent of union elections are the subject of complaints received by OLMS. Often cases were closed for a variety of reasons, including that the violations investigated did not affect the outcome of certain elections, no violations were uncovered, or complaints were procedurally defective. During the same time, OLMS supervised a total of 17 rerun elections (i.e., elections in cases in which the union agreed to a new election, or a court found that there were violations). Again, while timing issues make comparison imperfect, it is a safe estimate that the number of rerun elections represent about 15.2 percent of the complaints filed.

The following highlights some of the most significant OLMS election investigations completed during FY 2024:

**Roofers Local 74 Agreed to Hold a New Election Under OLMS Supervision**

In October 2023, OLMS entered into a voluntary compliance agreement with Roofers Local 74, located in West Seneca, New York. The union agreed to conduct new nominations, a new election, and installation for the offices of business manager, business agent, president, vice president, recording secretary, sergeant at arms, and four executive board members under OLMS supervision. The investigation concluded that the union failed to comply with LMRDA Section 401(e) when it denied members in good standing the right to be candidates when it imposed an unreasonable membership meeting attendance requirement rendering approximately 94 percent of the membership ineligible to seek union office. The supervised election was conducted in February 2024.

**IAM District Lodge 19 Agreed to Hold a New Election Under OLMS Supervision**

In October 2023, OLMS entered into a voluntary compliance agreement with International Association of Machinists & Aerospace Workers (IAM) District Lodge 19, located in Denver, Colorado. The union agreed to conduct a new election, with new nominations, if necessary, for the offices of president/directing general chairman and secretary/treasurer under OLMS supervision. The investigation concluded that District Lodge 19 failed to re-mail election notices, even though forwarding addresses were provided by the U.S. Postal Service, for more than 104 members. The supervised election was conducted in May 2024.

**AFGE Agreed to Hold a New Election Under OLMS Supervision**

In November 2023, OLMS entered into a voluntary compliance agreement with American Federation of Government Employees (AFGE), located in Washington, D.C. The union agreed to conduct a new caucus election, including credentialing of all delegates, for the office of District 4 National Vice President under OLMS supervision. The investigation found that AFGE denied members the right to vote when some local unions did not receive the proper number of ballots to vote in the District 4 national officer election. The supervised election was conducted in March 2024.

**IUE-CWA Local 86116 Agreed to Hold a New Election Under OLMS Supervision**

In March 2024, OLMS entered into a voluntary compliance agreement with Industrial Union of

Electrical Workers - Communications Workers of America (IUE-CWA) Local 86116, located in St. Joseph, Missouri. The union agreed to conduct new nominations, a new election, and installation for the offices of president, vice president, financial secretary, recording secretary, sergeant-at-arms, chief stewards (2), and trustee under OLMS supervision. The investigation disclosed that Local 86116 failed to elect its officers by secret ballot, failed to provide adequate safeguards to ensure a fair election (by not including an additional polling site in the election notice), and failed to provide proper notice of election to all members. The supervised election was conducted in July 2024.

#### **IBT Local 2750 Agreed to Hold a New Election Under OLMS Supervision**

In April 2024, OLMS entered into a voluntary compliance agreement with International Brotherhood of Teamsters (IBT) Local 2750, located in Cincinnati, Ohio. The union agreed to conduct a new election of all contested officer positions under OLMS supervision. The investigation revealed that Local 2750 denied eligible members a reasonable opportunity to vote when it failed to notify members of a polling site opened at the union's office on the day mail ballots were due to the union and when it instituted a 30-day mail balloting period that did not give members sufficient time to vote and return ballots due to the nature and locations of their employment. A significant number of members lived and worked overseas for extended periods. The supervised election was conducted by mail ballot in August 2024.

#### **CWA Local 6215 Agreed to Hold a New Election Under OLMS Supervision**

In April 2024, OLMS entered into a voluntary compliance agreement with the Communications Workers of America (CWA) Local 6215, located in Dallas, Texas. The union agreed to conduct a new election for the offices of president, vice president, and chief stewards of five jurisdictions within the local under OLMS supervision. The investigation determined that Local 6215 failed to accommodate a candidate's reasonable request to distribute campaign literature via the union's email address list. The investigation further found that the local failed to properly maintain its voter eligibility list, thereby denying eligible members the right to vote and permitting votes to be cast by ineligible members or non-members. The supervised election was conducted in July 2024.

#### **Department Filed Suit Against BCTGM Local 1**

In May 2024, in the United States District Court for the Northern District of Illinois Eastern Division, the Department filed suit against Bakery, Confectionery, Tobacco Workers & Grain Millers (BCTGM) Local 1, located in Lyons, Illinois, seeking to nullify the union's 2023 election. The complaint alleged that the union denied members a reasonable opportunity to vote by failing to mail an election notice to all members at their last known home address not less than 15 days prior to the election and by failing to mail ballots to members in good standing, in violation of Section 401(e) of the LMRDA. In November 2024, a settlement order was signed by the court for OLMS to supervise the next regularly scheduled union officer election.

#### **AFGE Local 2876 Agreed to Hold a New Election Under OLMS Supervision**

In May 2024, OLMS entered into a voluntary compliance agreement with American Federation of Government Employees (AFGE) Local 2876 in Washington, D.C. The union agreed to hold a new election for the offices of president, vice president, and secretary-treasurer under OLMS supervision. The investigation determined that Local 2876 misaddressed the pre-printed envelopes that members used to return voted ballots in the mail ballot election. The investigation also found that Local 2876 did not maintain a record of the number of ballots mailed to the membership or retain voted ballots that were received after the election. The supervised election was conducted in July 2024.

### **Department Filed Suit Against SIA**

In July 2024, in the United States District Court for the District of Utah, the Department filed suit against SkyWest InFlight Association (SIA), located in Salt Lake City, Utah, seeking to nullify the union's 2023 election of representatives and the subsequent 2024 rerun, as well as prior elections for the officer positions of president, vice president, and secretary. The complaint alleges that the union violated Title IV of the LMRDA when it only allowed incumbent representatives to nominate and run for executive officer positions and required candidates for executive offices to first win a quasi-primary election among the incumbent representatives before allowing the membership to vote. The union also failed to mail an election notice to the last known home address of all members at least 15 days prior to the election. Additionally, the union failed to elect officers at least every three years but rather were electing representatives to terms of four years or longer, in violation of Section 401(b) of the LMRDA. Litigation is pending.

### **IATSE Local 333 Agreed to Hold a New Election Under OLMS Supervision**

In July 2024, OLMS entered into a voluntary compliance agreement with International Alliance of Theatrical Stage Employees (IATSE) Local 333, located in Charleston, South Carolina. The union agreed to hold new nominations and a new election for the office of president under OLMS supervision. The investigation determined that Local 333 mailed the ballots too late to allow members to vote and return their ballots in time to be counted. In addition, the union failed to ensure voter secrecy when election officials at the ballot tally wrote voters' initials on the ballot secrecy envelopes before the ballots were removed and counted. The supervised election was conducted in October 2024.

### **Court Ordered Rerun of IUEC Local 18 Election**

In August 2023, in the United States District Court for the Central District of California, a settlement was reached between International Union of Elevator Constructors (IUEC) Local 18, located in Glendora, California, and the Department of Labor. The settlement agreement required IUEC Local 18 to conduct a new election for the offices of business manager, trustee, and executive board members (3) under OLMS supervision. The Department's 2022 lawsuit alleged that during Local 18's 2021 election, the union violated Title IV of the LMRDA when, after issuing a second ballot package eight days after issuing the first, it failed to provide sufficient voting instructions to members and failed to provide clear, timely notice that members who had already voted the first ballot were required to vote the revised ballot in order to have their vote counted. As a result, at least 135 members, who only voted the first ballot, were denied the right to vote when their ballots were not counted. The supervised election was conducted in June 2024 and certified by the court in August 2024.

## **3. Labor Union and Labor-Management Transparency**

The LMRDA is predicated on the principle that union members, officers, and the public benefit by having access to information about labor unions, union officers and employees, employers, labor relations consultants, and surety companies. To this end, OLMS administers a comprehensive reporting and disclosure program. OLMS also offers compliance assistance sessions for union members and officials as well as employers and labor-relations consultants surrounding the financial reporting obligations under the LMRDA.

Title II of the LMRDA requires that unions file annual financial reports, known as Labor-Management (LM) Reports (Forms LM-2, LM-3, LM-4, or simplified filings), with OLMS. Unions must also file trusteeship reports (Forms LM-15, LM-16) when they establish supervision or control over a subordinate body. Other entities, such as employers (Form LM-10), labor relations consultants (Forms LM-20, LM-21), union officers and employees (Form LM-30), and surety companies (Form S-1), are also required to file reports under specified circumstances. Reports are available for public disclosure on the OLMS [Online Public Disclosure Room website](#). OLMS also collects and maintains collective bargaining agreements (CBAs) filed by CBA signatories on a voluntary basis. These CBAs also are located on the [OLMS website](#).

During FY 2024, OLMS continued its “persuader” [initiative](#) to improve the filing and disclosure of persuader arrangements made between employers and labor consultants, as required under the LMRDA. In 2024, OLMS obtained a combined 1,384 Form LM-10 employer persuader reports (checking Items 8.e. and 8.f) and Form LM-20 consultant reports disclosing employer-consultant agreements or arrangements to persuade employees to exercise or not to exercise their rights to organize and engage in collective bargaining or obtain information from employees or labor organizations involved in a labor dispute with the employer.

As with other sections of the LMRDA, OLMS has investigative authority to determine whether a Form LM-10 and Form LM-20 should be filed. In instances when people or entities fail to comply with agency requests, OLMS has the authority to issue subpoenas. In FY 2023, OLMS used its subpoena authority in connection with an investigation to seek documents needed to determine if money spent by Starbucks Corporation, the Seattle-based multinational operator of coffeehouses and roasteries, was related to worker organizing campaigns and would require the company to file an LM-10 report. Since the company did not comply with the subpoena, the Acting Secretary of the Department of Labor filed suit in the U.S. District Court for the Western District of Washington and asked that the subpoena be enforced. On October 4, 2023, the court directed Starbucks to provide requested documents from fiscal years 2021 and 2022 to determine compliance with the LMRDA. In its ruling, the court rejected Starbucks’ attempts to challenge the department’s subpoena power.

OLMS received, processed, and made the following reports publicly available in FY 2024.

<b>OLMS LMRDA Reports Administration</b>	<b>FY 2024</b>
Form LM-1 Labor Organization Information Reports	234
Form LM-2 Labor Organization Annual Reports	4,920
Form LM-3 Labor Organization Annual Reports	9,538
Form LM-4 Labor Organization Annual Reports	6,089
Simplified Labor Organization Annual Reports	974
Form LM-10 Employer Reports	595
Form LM-15 Trusteeship Reports (initial, semiannual, and 15A)	417
Form LM-16 Terminal Trusteeship Reports	44

<b>OLMS LMRDA Reports Administration</b>	<b>FY 2024</b>
Form LM-20 Labor Relations Consultant Agreement and Activities Reports	1,092
Form LM-21 Labor Relations Consultant Receipts and Disbursements Reports	134
Form LM-30 Labor Organization Officer and Employee Reports	440
Form S-1 Surety Company Annual Reports	65
<b>Total Reports</b>	<b>24,542</b>

OLMS utilizes a web-based Electronic Forms System (EFS) that filers must use to complete and submit LM reports. The system allows any of these filers to complete and electronically submit an LM report without any special software or a digital signature. When filing a report, EFS performs calculations for the LM report and completes a form error check prior to submission to OLMS. EFS also allows unions that maintain electronic accounting records to import financial data from their accounting programs directly into their LM forms.

When labor organization annual reports are not filed in a timely manner or the reports filed are deficient, OLMS can open an investigation to obtain compliance. When reports due from employers, labor relations consultants, and union officers and employees are not timely or properly completed, OLMS also may pursue delinquent and deficient reports. These investigations are known as “Special Reports” cases. Consistent with our renewed focus on timely and accurate filing of employer and consultant reports, OLMS obtained more persuader reports this year than it has in a decade.

OLMS tracks the numbers of delinquent and deficient reports and special reports cases completed.

During FY 2024, OLMS had success reducing the number of labor organizations on a “chronic delinquency” watch list. A union is chronically delinquent if it is late filing its report three years in a row. To prevent chronic delinquency, OLMS reaches out to unions who have filed late in the previous two years. These are the unions most in danger of becoming chronically delinquent. The goal was to remove 360 unions from the list by assisting them to file on time. By year’s end, OLMS had exceeded this goal and removed 501 filers from the chronic delinquency watch list.

<b>OLMS Performance Goal – Reporting and Disclosure</b>	<b>FY 2024 Target</b>	<b>FY 2024 Results</b>
Reduce the Chronically Delinquent Watch List of 1,199 unions by 30% (Target 839 or fewer)	≤ 839	698

<b>OLMS Enforcement Statistics – Reporting and Disclosure</b>	<b>FY 2024 Plan</b>	<b>FY 2024 Results</b>
LM-2/3/4 Delinquent Reports Cases Completed	1,449	1,192
LM-2/3/4 Deficient Reports Cases Completed	226	214
Special Reports Cases Completed	119	105

## 4. Employee Protections

OLMS also administers responsibilities under federal transit law by ensuring that fair and equitable arrangements protecting mass transit employees are in place before the Federal Transit Authority releases federal transit assistance to state and local transit authorities. See, e.g., 49 U.S.C. § 5333(b). When federal funds are used to acquire, improve, or operate a transit system, federal law requires that arrangements must be made to protect the rights of affected mass transit employees. These arrangements must be approved by OLMS before the U.S. Department of Transportation's Federal Transit Administration can release funds to mass transit employers.

In FY 2024, OLMS certified employee protections for 1,770 federal transit grants. OLMS certified 99 percent of grants within a 45-day timeframe, well under the 60 days permitted by OLMS guidelines (29 CFR § 215). Pursuant to 29 CFR § 215.7, OLMS notified unions and the public of 314 rural grants, to which the FTA applied the Special Warranty Arrangement that meets the Act's requirements. More information about employee protections under federal transit law can be found on the [OLMS website](#).

## 5. Compliance Assistance

In FY 2024, OLMS undertook the following initiatives as part of a comprehensive compliance assistance program to educate unions, union officials, employers, and consultants about the LMRDA:

OLMS continued its program of structured, nationwide compliance assistance seminars, but sought to reduce the number of sessions while increasing attendance through enhanced recruitment. The goal of this program is to provide an opportunity each year for the officers of every labor organization to attend a compliance assistance seminar. The content of the compliance assistance seminar is similar throughout the country so that every officer in attendance benefits from the same material. In 2024, OLMS conducted 113 compliance assistance seminars. OLMS had a greater reach in FY 2024 than in FY 2023; OLMS provided formal compliance assistance events to 4,871 participants and recorded 14,483 contact hours (i.e., the number of participants multiplied by the number of hours of instruction).

- OLMS responded to all requests for compliance assistance seminars. OLMS also received and responded to hundreds of requests for information and policy interpretations.
- In FY 2010, OLMS began working with the nation's most prominent international and national unions through the Voluntary Compliance Partnership (VCP) initiative, leveraging their resources to improve the compliance performance of their over 16,000 affiliates. During FY 2024, the VCP program included 50 partner national or international unions. VCP added three new union partners at the end of FY 2023 and officially welcomed them to the program in FY 2024. VCP continued to solidify its platform as a national compliance assistance effort focused on improving timely reporting, bonding coverage, accurate and complete reporting including the submission of union constitutions and bylaws, and the implementation of financial safeguards to prevent unions from becoming victims of financial fraud. VCP is a strategic leadership effort that requires executive level involvement from OLMS and officer level involvement from the union, which helps to drive compliance throughout the labor-management community by providing tools, information, and assistance. The overall on-time filing rate for unions under the VCP initiative is significantly higher than that of non-VCP unions, with on-time filing rate increasing again in FY 2023 (the latest

available union fiscal year) at 83% overall (85% for VCP unions and 70% for non-VCP unions). OLMS leadership met directly with the presidents and secretary-treasurers of 31 VCP member unions in FY 2024. In total, OLMS distributed 48 comprehensive annual VCP informational reports, specifically tailored for the different VCP international and national unions.

- OLMS continued to advance its Persuader Reporting Orientation Program (PROP), a compliance assistance initiative to inform employers and their representatives about potential reporting obligations under the LMRDA. PROP enables OLMS to contact employers involved in representation elections – and any parties that have notified the National Labor Relations Board (NLRB) of their status as representatives for such employers – to inform them of potential LMRDA reporting requirements. OLMS provides information on where to locate reporting forms and instructions and how to contact OLMS to ask questions or obtain additional information. OLMS also provides a [fact sheet](#) on reporting employer-consultant agreements.
- In FY 2024, OLMS continuing sending a PROP-type letter to labor unions who were petitioners seeking an NLRB representation election, notifying them of the employer and consultant reporting requirements on the employers whose employees they were seeking to represent. The letter also encourages them to submit tips to OLMS concerning potentially delinquent or deficient reports.
- OLMS managed a public email address, enabling it to respond to over 2,000 inquiries and requests from the public in the year.
- OLMS continued its Labor Organization Orientation Program (LOOP), which distributes information letters to newly registered labor organizations. In FY 2024, OLMS continued sending LOOP letters to non-filing organizations that submitted union representation election petitions with the NLRB, notifying them of the LMRDA’s union reporting and other requirements.

## 6. Outreach

In FY 2024, OLMS continued its initiative to educate workers, unions, policy makers and the public more broadly about OLMS’ work and the important role labor unions play in the modern American economy. These efforts include:

- A series of blog posts by the OLMS Director under the website heading “[From the Director’s Desk](#)” discussing in a narrative form OLMS’ work and the role of the labor movement in the modern American economy.
- Presentations on varied labor topics (in person and virtually) by the Director to the regulated community.
- Continuing the Labor-Management Partnership Program (LMPP), originally developed in the 1980s to explore and promote the benefits of labor-management collaboration. The program spearheads agency-wide and national initiatives to foster cooperative relationships that bring workers, unions, and employers together to collaboratively address challenges, enhance decision-making, and improve workplaces. Serving as a resource hub for building and sustaining labor-management partnerships, the LMPP also offers guidance and tools for interested stakeholders. In FY 2024, OLMS launched a dedicated Labor-Management Partnerships (LMP) website, featuring resources,



inspiring examples of successful partnerships, and a platform for the public to share their personal LMP stories. This year, the OLMS attended and presented at 15 events and conferences to build relationships with external stakeholders in myriad industries across the nation.