

2009 Annual Report

Office of Labor-Management Standards

U.S. Department of Labor
John Lund, Director



January 2010
Revised Dec. 2010

Introduction

When the Labor-Management Reporting and Disclosure Act (LMRDA) was enacted in 1959, Congress declared, "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 establishes standards for union officer elections, safeguards for protecting financial integrity, and requirements for financial reporting. The Office of Labor-Management Standards (OLMS) continues today to pursue this important mission through criminal and civil enforcement of the LMRDA.

OLMS ensures union democracy and financial integrity and advances labor-management transparency so that workers can have a more effective voice in the governance of their unions and a collective voice in their workplaces. Through these efforts, OLMS supports the Secretary's vision of "*good jobs for everyone*" by advancing the goal to ensure that workers and union members have a *voice in the workplace*.

The major provisions of the LMRDA, by title, are:

- 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

OLMS also administers provisions of the Civil Service Reform Act of 1978 and the Foreign Service Act of 1980, which extend comparable protections to Federal labor unions. In addition, OLMS' Division of Statutory Programs administers the Department's responsibilities under the Federal Transit Act by ensuring that fair and equitable arrangements protecting mass transit employees are in place before the release of Federal transit grant funds.

OLMS is the front line agency responsible for enforcing the LMRDA through its criminal and civil investigations. Criminal investigations include embezzlement, deprivation of rights by violence, extortionate picketing, willful failure to file reports, filing false reports, prohibited union office holding or employment of convicted persons, and fraud related to union elections. Civil investigations include violations of the LMRDA in union election procedures, financial disclosure requirements, and trusteeship standards.

OLMS conducts audits of union finances, administers a comprehensive compliance assistance program, and offers information and technical support to union officers and members to further the goals of financial integrity, union democracy, and transparency.

Compliance assistance also plays a central role in the OLMS enforcement strategy. OLMS has an active compliance assistance program to promote voluntary compliance with the LMRDA by informing union officers of their responsibilities and informing members of their legal rights.

Summary

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

- Section 1 presents key criminal enforcement results pursuant to LMRDA Title V, for FY 2009 and the preceding four-year average, together with several noteworthy criminal enforcement actions in FY 2009. A complete listing of these actions can be located at http://www.dol.gov/olms/regs/compliance/enforcement_1.htm on the OLMS website.
- Section 2 presents key civil enforcement results pursuant to LMRDA Title III (trusteeships) and Title IV (union officer elections), together with noteworthy union officer election case summaries for FY 2009. A listing of union officer election voluntary settlement agreements can be located at http://www.dol.gov/olms/regs/compliance/civil_actions.htm. Final decision letters in election and trusteeship cases can be located on the OLMS website at http://www.dol.gov/olms/regs/compliance/OLMS_FOIA.htm.
- Section 3 presents reporting and disclosure data and related program activity pursuant to LMRDA Title II. Reports are available for public disclosure on the OLMS Internet reporting page, www.unionreports.gov.
- Section 4 presents grant certification data pursuant to Section 13(c) of the Federal Transit Act ensuring fair and equitable arrangements protecting mass transit employees.
- Section 5 presents major regulatory activities conducted in FY 2009.
- Finally, Section 6 briefly describes compliance assistance activities conducted in FY 2009.

Program Activities

1. Safeguarding Union Assets

As part of its effort to protect and safeguard union funds and assets, OLMS investigates possible embezzlement from unions and other violations of criminal laws. Over the past 10 years, restitution of \$102,615,236 has been paid or ordered to be paid to defrauded unions and other parties. OLMS also conducts audits of local, intermediate, and international unions to ensure and promote their compliance with the LMRDA. Compliance audit closing letters can be located at http://www.dol.gov/olms/regs/compliance/CA_closing_letters.htm on the OLMS website.

OLMS Enforcement Statistics – Financial Integrity	FY 2009	FY 2005 – FY 2008 Yearly Average
Criminal Cases Processed	405	368
Indictments	123	117
Convictions	121	113
Compliance Audits Conducted	754	736

Union officers, employees, and representatives have a duty to manage the funds and property of the union solely for the benefit of the union in accordance with its constitution. A union officer or employee who embezzles or misappropriates union funds or assets commits a federal crime punishable by fine and/or imprisonment. OLMS is responsible for investigating these crimes. Following are some of the most significant criminal enforcement actions from FY 2009.

Two Former ATU Local 1181 Officials Sentenced to Prison in Extortion Scheme

In December 2009, members Nick Maddalone and Paul Maddalone, who served as delegates, executive board members, and assistant trustees for Amalgamated Transit Union (ATU) Local 1181, located in New York, New York, were sentenced to 10 months in prison for their roles in a decades-long scheme to extort cash from New York City school bus company owners. ATU Local 1181 is a union consisting of about 14,500 members employed as bus drivers and escorts by companies that contract with the New York City Department of Education. The scheme involved shakedowns of both union and nonunion school bus company operators. The brothers pled guilty to one count of extortion conspiracy in September 2009. In addition to the prison sentence, Nick Maddalone was ordered to pay \$40,000 in restitution and Paul Maddalone was ordered to pay \$31,000 in restitution. The two were the fourth and fifth Local 1181 officials to be convicted in a series of cases involving corruption in the local.

OLMS began this investigation in 2006. The investigation has resulted in five union officers and seven employees of the New York City Department of Education charged with racketeering and other charges. In addition, the local was placed under trusteeship. This investigation was conducted jointly with the DOL Office of Inspector General and the Federal Bureau of Investigation.

Former Secretary-Treasurer Pled Guilty to Embezzling \$163,222 from Organizers Union

An OLMS investigation resulted in Larry Ramsey, former secretary-treasurer of the Representatives and Organizers Union, located in St. Louisville, Ohio, pleading guilty to embezzling \$163,222. Ramsey used the local’s debit card to deplete the union’s coffers by making 440 cash withdrawals. He also wrote more than 100 unauthorized checks to himself. Ramsey was sentenced to 3 years probation, including 6 months home confinement, and was ordered to pay remaining restitution of \$131,003 and a special assessment of \$100.

Former ILWU Bookkeeper Jailed after being Found Guilty of Embezzling \$121,000

After a three-year investigation culminating in a six-day trial, former bookkeeper/office manager Rosa de la Porta was found guilty of embezzling union funds from the International Longshore and Warehouse Union (ILWU) Local 26 located in Los Angeles, California. Evidence presented at the trial established that de la Porta embezzled \$121,475 from members’ cash dues payments from 2002 through 2006 and then created a highly refined double set of receipt records to conceal her theft. She was sentenced to 21 months in prison, 3 years supervised release, and was ordered to pay full restitution.

Federal Corrections Officer Pled Guilty to Fraud of More than \$186,000

Don Padgett, former secretary treasurer for the American Federation of Government Employees Local 1304 in Wayne County, Illinois, misappropriated approximately \$186,997 in union funds. Padgett admitted to Department of Labor investigators that he converted union funds to his personal use by writing checks to himself and making unauthorized charges on the union's credit card. Padgett attempted to conceal his embezzlement by filing false union reports and a false financial disclosure report with the Department of Labor. A federal grand jury indicted Padgett in a two-count indictment charging him with mail fraud and one count of criminal forfeiture. Padgett was convicted of mail fraud and ordered to make full restitution to the union, serve 3 years in prison and 3 years of supervised release following his prison term.

Former Pennsylvania Steelworkers Field Secretary Incarcerated

Donna Simpson, former field secretary for District 10 office of the United Steelworkers located in North Versailles, Pennsylvania, embezzled \$87,823 by writing 82 unauthorized checks to herself, and falsifying union records to hide her embezzlement. Simpson pled guilty to one count of embezzlement of \$87,823 and was sentenced to 6 months incarceration and 6 months home detention to be followed by 2 years supervised release and was ordered to make full restitution to the union. She reported to the Bureau of Prisons on September 21, 2009.

Former AFGE Treasurer Embezzled \$77,857 and Filed False LM Report

From April 2006 through June 2007, Edna Latimore, former treasurer of the American Federation of Government Employees (AFGE) Local 900 located in St. Louis, Missouri made unauthorized electronic withdrawals from the local's bank account totaling \$77,857. To conceal her embezzlement, Latimore presented false treasurer's reports to the local's executive board and filed false Form LM-3 reports with the Department of Labor. Latimore pled guilty to making a false statement and misrepresentation of a material fact. On October 30, 2008, Latimore was sentenced to 6 months home confinement, 3 years probation, and was ordered to pay full restitution to the union.

Steelworkers Local and AFL-CIO Central Body Defrauded by Top Official

While serving as rapid response coordinator for Steelworkers Local 08-9443 and president of the Tri-County Council of Labor in Henderson, Kentucky, Ray Horton filed lost time claims for work he never performed and expense claims for funds he was not owed. Horton also used the U.S. mail to solicit and collect more than \$20,000 in donations for a workers' memorial. Horton then stole that money from the Council by writing unauthorized checks to himself. Horton was convicted of mail fraud and embezzlement, sentenced to 3 years probation, including 4 months community confinement, and ordered to pay \$43,816 in restitution as well as \$200 in court costs.

Former Boilermakers Secretary-Treasurer Sentenced for Stealing \$52,037 in Iowa

An OLMS investigation of Thomas Jon Witham led to a one-count indictment of embezzlement totaling \$52,037. Witham, former secretary-treasurer of Boilermakers Lodge D-106 in Mason City, Iowa, used the lodge's debit card to make cash withdrawals and pay for personal expenses, including living room furniture, a subscription to an Internet-dating site, and a trip to Albuquerque, New Mexico, to participate in a bowling tournament. Witham, who originally pled not guilty to the charge, later changed his plea to guilty. He was sentenced to 21 months in federal prison and ordered to pay Lodge D-106 \$52,037 in restitution. Following his release from prison, Witham will be placed on 3 years supervised release.

Former Machinists Lodge 2460 Secretary-Treasurer Embezzled \$90,000

Glen Gard, former secretary-treasurer for Machinists Lodge 2460 located in Pensacola, Florida, embezzled \$90,349 between April 2006 and October 2007. Gard forged the president's signature on 126 checks and was the sole signatory on two checks. Gard admitted to the forgery and embezzlement. OLMS investigation also found that Gard falsified vouchers during the same period and failed to report the unauthorized checks to himself in an attempt to conceal the embezzlement. On March 27, 2009, Gard pled guilty. He was sentenced to 90 days imprisonment, 3 years supervised release with 6 months of home detention, and was ordered to pay restitution of \$90,349.

Former Local Union Treasurer Convicted of Embezzlement

From January 2000 through November 2007, Joseph Stefanik former treasurer of Steelworkers Local 1450 in Watertown, New York, wrote unauthorized checks to himself and to cash totaling more than \$47,000. A grand jury indicted Stefanik for embezzling union funds from February 2004 through November 2007. Stefanik pled guilty to the embezzlement charge and agreed to make restitution. He was sentenced to 1 year and 1 day in federal prison, 3 years of supervised release when his prison term ends, and is required to enter a substance abuse program. The judge also ordered Stefanik to make restitution of \$46,012 and pay a \$100 special assessment fee.

Former Secretary-Treasurer of IATSE Local Sentenced to Prison Term

Stephen Pfeiffer, former secretary-treasurer of Stage and Picture Operators Local 60 in Pensacola, Florida confessed that, sometime in 2000, he began paying himself for work performed by union and non-union members on contracted union jobs. Pfeiffer received calls from companies and contractors seeking union contracts and requesting referrals for positions they needed to fill. Pfeiffer passed this information to former local president, Michael Kyser, who would contact union and non-union members to fill the positions. When Pfeiffer received the payments from the contractors, he deposited the money into the union's account and wrote checks to the members and non-union members for the work performed, but left 5% of the total value of the check in the union's checking account to be split evenly between himself and Kyser. Pfeiffer admitted that he did not obtain executive board or membership approval for the compensation he paid himself. Pfeiffer pled guilty to embezzlement and was sentenced to 13 months imprisonment, 3 years probation, and was ordered to pay restitution of \$6,824 and a special assessment of \$100. This investigation was conducted jointly with the DOL Office of Inspector General.

Embezzlement from Local's Strike Fund Leads to Incarceration

An investigation of Stephen Snyder, the former financial secretary for Steelworkers Local 5724 in Clarington, Ohio, revealed that Snyder took advantage of his position as financial secretary and his access to members' strike fund records to cause 177 unauthorized strike fund checks to be issued on behalf of other members. Snyder deposited these checks into his personal bank accounts and used the funds to pay his personal creditors. This scheme resulted in Snyder embezzling \$78,893 from the local over an eighteen-month period. Snyder was sentenced to 5 months incarceration, 5 months home confinement, and was ordered to make full restitution to the union. This investigation was conducted jointly with the Federal Bureau of Investigation.

Former Officer of Longshoremen's Local Denied Section 504 Exemption

George Spencer, former president of International Longshoremen's Association (ILA) Local 1408 in Jacksonville, Florida, filed a petition in federal district court for an exemption from Section 504 of the LMRDA, which prohibits him from holding union office or employment based on a conviction in January 2004 in Florida State court for witness tampering. He

undermined his chance of receiving an exemption when, during the OLMS investigation, he approached a witness and asked the witness to change a statement the witness had made to OLMS investigators. The witness, who felt intimidated by Spencer, contacted OLMS and reported the contact. OLMS included the details related to this incident in its report of investigation to the United States Attorney along with statements from other union employees and officers substantiating the OLMS position that Spencer had not demonstrated that he had been rehabilitated. Spencer remains barred from union office and employment until 2017.

2. Protecting Union Democracy

The LMRDA establishes democratic standards for conducting 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 voting rights of members. When a union member files a timely complaint protesting a regularly scheduled election of union officers, OLMS conducts an investigation. If the investigation reveals a violation of the union-democracy provisions of the LMRDA that may have affected the outcome of the election, OLMS asks the union to agree to allow OLMS to supervise a new election. If the union agrees, a voluntary compliance agreement is signed. If the union does not voluntarily agree to remedy the violation, OLMS may take legal action seeking a new election supervised by OLMS. The agency also conducts investigations to determine the validity of the imposition or continuation of trusteeships imposed by national unions on subordinate bodies. Trusteeship investigations are conducted upon receipt of a complaint from a member or subordinate body.

OLMS Enforcement Statistics – Union Democracy	FY 2009	FY 2005 – FY 2008 Yearly Average
Election Investigations Conducted	128	126
Lawsuits Filed	9	9
Voluntary Compliance Agreements Obtained	23	24
Supervised Elections Completed	32	32
Trusteeship Investigations	14	11

Following are highlights of some of the most significant OLMS election cases during FY 2009.

Chicago Teamsters Officials Convicted and Sentenced for Election Fraud

The International Brotherhood of Teamsters (IBT) Local 743 saw six union representatives convicted and sentenced for their role in the conspiracy to rig two 2004 union officer elections in the 12,000+ member union in the Chicago metropolitan area. Between August and December 2004, former president Robert Walston, former recording secretary Richard Lopez, former comptroller Thaddeus Bania, former organizer David Rodriguez, former business agent Cassandra Mosley, and former head organizer Mark Jones caused addresses of union members to be changed in the union’s computer database so that official ballot packages were diverted to the homes of their friends, family, and associates who were not members of Local 743 and therefore not eligible to vote in the two closely contested 2004 union officer elections. The six conspirators collected the fraudulently delivered ballot packages and cast them or caused them to be cast in favor of the incumbent officers to ensure their victory. On September 3, 2009, Walston was sentenced to 57 months imprisonment and 3 years supervised release; on August 27, 2009, Lopez was sentenced to 24 months in prison and 2 years supervised release; on August 27, 2009, Bania, was sentenced to 40 months in prison and 2 years supervised release; on August

27, 2009, Rodriguez was sentenced to 18 months in prison and 2 years supervised release; on September 1, 2009, Mosley was sentenced to 1 day served in prison followed by 6 months home confinement; and on September 29, 2009, Jones was sentenced to 6 months probation and fined \$2000. In addition, Walston, Bania, and Mosley were ordered to pay restitution totaling \$900,936 while Lopez and Rodriguez were ordered to pay restitution totaling \$864,924. This investigation was conducted jointly with the DOL Office of Inspector General and the U.S. Postal Inspection Service.

Communications Workers Local 6215 Held New Supervised Election

On April 1, 2009, OLMS negotiated a voluntary settlement agreement with Communications Workers of America (CWA) Local 6215, a local located in Dallas, Texas with approximately 5,000 members, to conduct a new election under the Department's supervision. During its investigation of the local's October 10, 2008 election, OLMS found that at least 191 votes were not counted when the union mailed an election notice with two different deadlines for returning voted ballots, 199 members were denied the right to vote when the local did not attempt to update their addresses and re-mail their ballot packages that had been returned undelivered, and four members were not mailed ballots due to a computer code error. In addition, the local failed to provide adequate safeguards during the preparation of the ballots and candidates' observers were not allowed to observe the entire ballot tally. Finally, the local failed to follow its constitution and bylaws when the candidates who received the most votes were not installed. The remedial election supervised by OLMS was completed on July 16, 2009.

Voluntary Settlement Agreement with National American Postal Workers Union

OLMS and the American Postal Workers Union (APWU) entered into a voluntary settlement agreement in which OLMS supervised the election of two national business agent positions. During its investigation of the APWU's 2007 election, OLMS found that motor vehicle division members in certain states were sent incorrect ballots and union funds were used to promote candidates through improper local endorsements. OLMS supervised new elections for both of these positions. OLMS had to overcome several obstacles to complete this election in accordance with the LMRDA and the union's constitution and bylaws, including a hurricane that displaced many members from their homes in the middle of the balloting period. The OLMS-supervised remedial election was successfully completed in November 2008.

Auto Workers Local Voluntarily Agreed to Remedial Election

OLMS' investigation of the April 16, 2008 officer election conducted by Auto Workers Local 400 disclosed that candidates were denied the opportunity to mail their campaign literature to a portion of the membership; improper restrictions were placed upon a candidate's observer; and the union did not properly secure the ballots prior to voting. Local 400 agreed to conduct a new election under OLMS supervision for the positions of president and vice president. The supervision of the 8,200-member local union required 18 OLMS personnel from five district offices to oversee the voting at eight polling sites in the metro-Detroit area. The OLMS-supervised remedial election was completed on December 2, 2008.

Voluntary Agreement to Rerun 8,000-Member International Longshore and Warehouse Local Election

International Longshore and Warehouse Union (ILWU) Local 13 entered into a voluntary settlement agreement with OLMS on March 13, 2009, concerning the 2008 caucus delegate

election. Investigation determined that the union’s eligibility requirement that a candidate be a member for five years was not reasonable. The settlement agreement provided that ILWU Local 13 would conduct new nominations and a new election under the supervision of OLMS. The supervised election was completed May 14, 2009.

3. Reporting and Disclosure

The LMRDA is predicated on the principle that union members, officers, and the general public benefit by having access to information about labor unions, their 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 on the financial reporting obligations under the LMRDA. Unions must file annual financial reports (LM-2, LM-3, LM-4, or simplified filings) with OLMS. Unions must also file trusteeship reports (LM-15, LM-16) when supervision or control is established over a subordinate body. Other entities – employers (LM-10), labor relations consultants (LM-20, LM-21), union officers and employees (LM-30), and surety companies (S-1) – are also required to file reports under certain circumstances. Reports are available for public disclosure on the OLMS Internet reporting page, www.unionreports.gov. OLMS also collects and maintains collective bargaining agreements (CBAs) filed by CBA signatories on a voluntary basis. CBAs covering 1,000 or more workers are maintained by OLMS and can be located at <http://www.dol.gov/olms/regs/compliance/cba/index.htm>.

OLMS processed the following public disclosure reports in FY 2009.

OLMS Processing and Public Disclosure of LMRDA Reports	FY 2009
LM-2 Labor Organization Annual Reports Processed	5,416
LM-3 Labor Organization Annual Reports Processed	11,873
LM-4 Labor Organization Annual Reports Processed	9,063
Simplified Labor Organization Annual Reports Processed	1,697
LM-10 Employer Reports Processed	862
LM-15 Trusteeship Reports Processed (initial, semiannual, and 15A)	338
LM-16 Terminal Trusteeship Reports Processed	89
LM-20 Labor Relations Consultant Agreement and Activities Reports Processed	183
LM-21 Labor Relations Consultant Receipts and Disbursements Reports Processed	31
LM-30 Labor Organization Officer and Employee Reports Processed	1,839
S-1 Surety Company Annual Reports Processed	70
Total Reports Processed	31,461

When labor organization annual reports are not timely filed or the reports filed are not acceptable, OLMS opens delinquent or deficient reporting cases to obtain compliance. Additionally, when reports due from employers, labor relations consultants, union officers and employees are not timely or properly filed, OLMS pursues delinquent and deficient reports from these entities, as “Special Reports” cases.

OLMS Enforcement Statistics – Reporting and Disclosure	FY 2009	FY 2005 – FY 2008 Yearly Average
LM-2/3/4 Delinquent Reports Cases Completed	2,596	2,026
LM-2/3/4 Deficient Reports Cases Completed	749	740
Special Reports Cases Completed	61	59

4. Employee Protections

OLMS' Division of Statutory Programs (DSP) administers DOL responsibilities under Federal transit law by ensuring that fair and equitable arrangements protecting mass transit employees are in place before the release of Federal transit assistance. When Federal funds are used to acquire, improve, or operate a transit system, Federal law requires arrangements to protect the rights of affected mass transit employees. These arrangements must be approved by DOL before the U.S. Department of Transportation's Federal Transit Administration (FTA) can release funds to mass transit employers. More information about employee protections under Federal transit law, including compliance assistance materials, can be located on the OLMS website at <http://www.dol.gov/olms/regs/compliance/compltransit.htm>.

The American Recovery and Reinvestment Act of 2009 ("ARRA") invested \$8.4 billion in transportation infrastructure, facilities and equipment. Transit projects funded under ARRA included transit employee protection requirements. The funds appropriated for transit expenditures under ARRA included a "use-it-lose-it" condition making it imperative that OLMS' DSP process all grants well under the 45-day deadline normally instituted in DSP.

OLMS-DSP Transit Grant Certifications	FY 2009
ARRA Transit Grant Certifications	777
Traditional (Non-ARRA) Transit Grant Certifications	1,973
Total Transit Grant Certifications	2,750

5. Regulatory Activities

Form LM-2 and Form LM-3 Rulemaking

On October 13, 2009, OLMS published in the *Federal Register* a final rule that rescinded regulations published in the *Federal Register* on January 21, 2009. The January 21, 2009 regulations (74 FR 3677) had revised Labor Organization Annual Report Form LM-2, used by the largest labor organizations to file their annual financial reports under the Labor-Management Reporting and Disclosure Act of 1959, and established a procedure by which the Secretary of Labor may revoke, under certain circumstances, a particular labor organization's authorization to file a simplified Form LM-3 annual report.

Executive Order 13496: Notification of Employee Rights Under Federal Labor Laws

On August 3, 2009, OLMS published a notice of proposed rulemaking (NPRM) seeking comments on proposed 29 CFR Part 471. Proposed Part 471 implements provisions of Executive Order (E.O.) 13496, signed by President Barack Obama on January 30, 2009 (74 FR 6107, February 4, 2009). E.O.13496 requires Federal contractors and subcontractors to post a notice in their workplaces informing employees of their rights under Federal labor laws, and provides that the requirement to post the employee notice be included in Federal contracts and subcontracts.

The proposed regulation would implement E.O. 13496 by prescribing the form and content of the required notice. The notice in the proposed regulation outlines the fundamental rights regarding union activity and collective bargaining that employees have under the National Labor Relations Act (NLRA); provides examples of conduct that is illegal under the NLRA; and

provides contact information in the event that an employee suspects that the law has been violated. The proposed regulation also includes enforcement procedures and provisions regarding sanctions, penalties, and remedies that may be imposed for violations.¹

E.O. 13496 also revoked E.O. 13201, which required Federal contractors and subcontractors to post a notice (the “*Beck* poster”) informing their employees of rights concerning payment of union dues or fees. See E.O. 13496, Section 13. OLMS published a final rule on March 30, 2009, rescinding the regulations at 29 CFR Part 470, which had implemented the *Beck* poster provisions (74 FR 14045).

Form T-1 Trust Annual Report

On October 2, 2008, OLMS published a Final Rule implementing the Form T-1 Trust Annual Report. The Form T-1 is an annual financial disclosure report to be filed by labor unions with total annual receipts of \$250,000 or more about certain “trusts” in which they are interested. These trusts include, for example, building and redevelopment corporations, educational institutes, credit unions, labor union and employer joint funds, and job targeting funds. Labor unions will use the Form T-1 to disclose financial information about the trust, such as assets, liabilities, receipts and disbursements.²

6. Compliance Assistance

In FY 2009, OLMS undertook a comprehensive compliance assistance program to educate unions about the LMRDA:

- OLMS continued its program of structured, nationwide compliance assistance seminars. 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 is exposed to the same material. OLMS conducted 130 seminars in FY 2009.
- OLMS continued to be responsive to all specific requests for compliance assistance seminars.
- OLMS continued to promote and use an electronic mailing list system to send email messages to unions, accountants, union members, and other interested individuals. The electronic mailing list currently has 2196 subscribers, and OLMS sent 11 such messages in FY 2009.
- OLMS updated web pages for electronic annual financial disclosure forms for clarity and ease of use.

¹ OLMS published a final rule implementing the E.O. 13496 employee notice provisions on May 20, 2010 (75 FR 28368).

² OLMS published for notice and comment a proposal to rescind the Form T-1 Annual Report (75 FR 5456) on February 2, 2010. OLMS published a final rule rescinding the Form T-1 Annual Report (75 FR 5456) on December 1, 2010.