

2025 Annual Report

Office of Labor-Management Standards

U.S. Department of Labor

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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 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 and their officials, employers, labor relations consultants, and surety companies.

The Office of Labor-Management Standards (OLMS) pursues this important mission through criminal and civil enforcement of the LMRDA. OLMS is the lead agency responsible for safeguarding labor union assets and promoting democracy by enforcing the LMRDA through its criminal and civil investigations and creating transparency through public disclosure of various required forms. OLMS conducts criminal investigations into potential offenses such as embezzlement, deprivation of rights through violence, extortionate picketing, willful failure to file required reports, destruction of records, filing false reports, and election fraud within unions. Additionally, the LMRDA prohibits individuals convicted of certain crimes from holding union office or employment, or from occupying positions with employers or employer associations where they possess “specific collective bargaining authority or direct responsibility in the area of labor-management relations.” Civil investigations encompass violations of the LMRDA, including those related to union elections, financial disclosures by unions, union officers, employees, employers, and consultants, and the imposition of trusteeships on labor unions. OLMS also conducts audits of the financial conditions and operations of unions.

The Law

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 unions in 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. 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) 2025 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) [2025](#) criminal actions is located on the OLMS website along with those for [previous](#) calendar years.
- Section 2 presents key FY 2025 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 2025. A listing of all CY [2025](#) voluntary agreements for OLMS-supervised union officer elections is located on the OLMS website along with those for previous [years](#). Calendar year [2025](#) 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](#).
- Section 3 presents reporting and disclosure data and related program activity pursuant to LMRDA Title II (reporting requirements). Section 3 also presents key FY 2025 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 presents regulatory actions conducted in FY 2025.
- Section 6 describes compliance assistance activities and outreach conducted in FY 2025.

OLMS [Annual Reports for 2004–2024](#) are located on the OLMS website.

Program Activities

1. Safeguarding Union Assets

As part of the effort to protect and safeguard union funds and assets, OLMS investigates possible embezzlements from unions and other violations of criminal laws. OLMS also conducts audits of labor unions through the Compliance Audit Program (CAP) 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 civil violation during an audit, it attempts to enable the labor union to remedy the problem by providing 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 assist 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 union has not remedied violations by the conclusion of the audit, OLMS will open a “fall-out” case to obtain compliance. In FY 2025, OLMS exceeded its performance goal of successfully assisting unions to resolve 74% of violations found during the audits before closing the audit by resolving 84.71% of violations through voluntary compliance.

OLMS Performance Goal – Financial Integrity	FY 2025 Target	FY 2025 Results
Increase the percentage of violations resolved through voluntary compliance	74%	84.71%

OLMS Enforcement Statistics – Financial Integrity	FY 2025 Projection	FY 2025 Results
Investigations Criminal Completed	196	198
Indictments	60	39
Convictions	60	40
Compliance Audits Conducted	327	327

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. 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 the willful failure to file complete and accurate financial and other reports with OLMS or to maintain records. Significant criminal enforcement actions from FY 2025 are summarized below:

Former Union Officer Sentenced to Home Detention for Embezzling Over \$167,000

In February 2025, in the United States District Court for the Northern District of Ohio, Eastern Division, Kenneth Kleinhenz, former Treasurer of United Steelworkers (USW) Local 673, located in Olmsted Falls, Ohio, was sentenced to four years of probation, with the first eight months to be served on home detention, and ordered to pay an additional \$89,457 in restitution. Kleinhenz previously paid \$78,034 in restitution. In October 2024, Kleinhenz had pleaded guilty to embezzlement, in violation of

29 U.S.C. 501(c). The OLMS investigation found that Kleinhenz fraudulently initiated the following transactions from the union bank account to convert union funds to his own personal use: 120 cash withdrawals totaling \$62,492; 28 transfers to his personal bank account totaling \$58,309; 78 checks written to himself totaling \$45,379; and \$1,310 in bank fees incurred directly related to the embezzlement transactions. He then falsely omitted these fraudulent payments to himself from the union's annual reports filed with OLMS.

Former Union Official Sentenced for Embezzling Over \$55,000

In March 2025, in the United States District Court for the District of Massachusetts, Thomas J. Erickson, former Business Manager of Laborers' International Union of North America (LIUNA) Local 429, located in Lowell, Massachusetts, was sentenced to two years of probation. Erickson previously made restitution in the amount of \$56,725. In August 2024, Erickson had pleaded guilty to one count of embezzlement from a labor organization, in violation of 29 U.S.C. 501(c). The investigation found that Erickson collected cash dues in the field, which was prohibited, and failed to turn in all the money he had collected. Additionally, he used travel stipends without a clear record of approval by the executive board and used the union's credit card for personal expenses. The joint investigation was conducted with the Department of Labor's Office of Inspector General.

Former Union Officer Sentenced to Home Detention for Embezzling Over \$68,000

In March 2025, in the United States Court for the Southern District of New York, John Seid, former Secretary-Treasurer of International Alliance of Theatrical Stage Employees (IATSE) Local 306, located in New York, New York, was sentenced to three years of probation, to include six months of home detention. Seid was also ordered to pay restitution in the amount of \$65,843. In September 2024, Seid had pleaded guilty to one count of embezzlement of union funds, in violation of 29 U.S.C. 501(c). The OLMS investigation found that Seid used the union's credit card repeatedly to pay for his personal life expenses without any legitimate union purpose or authorization including entertainment, restaurants, shopping at Amazon and other retailers, as well as other expenses.

Former Union Officer Sentenced for Embezzling Over \$63,000

In March 2025, in the United States District Court for the Southern District of Texas, Houston Division, Israel Valdivia, former Secretary-Treasurer of International Association of Machinists and Aerospace Workers (IAMAW) Local Lodge 2198, located in Houston, Texas, was sentenced to three years of probation. He was also ordered to pay restitution in the amount of \$63,508 and a \$10,000 fine. In November 2024, Valdivia had pleaded guilty to one count of embezzlement of union funds, in violation of 29 U.S.C. 501(c). The OLMS investigation found Valdivia embezzled from the union in several ways including: 1) lost time payments and union salary payments reimbursing himself and others for unearned or excessive wages; 2) payment of Valdivia's and others' personal phone and internet bills, personal meal charges, and personal payments for cleaning services; and 3) payments in excess of the authorized per diem amount for union travel by Valdivia.

Former Labor Alliance Officials Sentenced to Prison for Multimillion-Dollar Fraud Scheme

In April 2025, in the United States District Court for the Eastern District of California, Marcus Asay, the founder and chairman of American Labor Alliance (ALA), located in Fresno, California, and Antonio Gastelum, Chief Operating Officer, Chief Financial Officer, and Compliance Officer of ALA, were both sentenced to prison for committing a pension fraud scheme through their company, Agricultural Contracting Services Association, doing business as ALA. Asay and ALA were also

convicted of running workers' compensation fraud and hardship exemption fraud schemes. Asay was sentenced to 60 months of imprisonment, followed by three years of probation. He was ordered to pay \$66,575 in restitution and a special assessment of \$1,900. Gastelum was sentenced to 24 months of imprisonment, followed by two years of probation. Asay and Gastelum received enhanced sentences because they both testified in their own defense at trial and were found to have perjured themselves. ALA received a corporate fine of \$2.5 million.

The sentences follow a June 2024, 19-day jury trial, at which both Asay and Gastelum were found guilty of mail fraud and conspiracy to commit mail fraud, in violation of 18 U.S.C. 1341 and 1349, respectively. Asay was also found guilty of wire fraud and money laundering, in violation of 18 U.S.C. 1343 and 18 U.S.C. 1956(a)(1)(B)(i), and 1957, respectively. As part of the pension fraud scheme, Asay, Gastelum, and ALA falsely represented to more than 3,000 people that they would protect and invest their retirement money through a 401(k) plan when, in fact, they used the money for improper business and personal expenses including restaurants, travel, credit cards, rare coins, transfers to Asay's personal retirement account, online companion websites, and rent for Asay's lakefront mansion. Asay, Gastelum, and ALA then covered up the fact that the retirement money was gone by taking money the company received from the workers' compensation fraud scheme and holding those funds out as pension funds. The loss caused by the pension fraud scheme was more than \$620,000. Asay laundered money when he moved pension funds through multiple bank accounts to conceal the source of the funds before using them for improper expenses. The joint investigation was conducted with the Department of Labor's Employee Benefits Security Administration, the Federal Bureau of Investigation, the Internal Revenue Service Criminal Investigation, and the Social Security Administration Inspector General.

Former Union Officer Sentenced to Prison for Bank Fraud Tied to Over \$56,000 Embezzlement

In April 2025, in the United States District Court for the Eastern District of Michigan, Dilanjan Miller, former President of United Steelworkers (USW) Local 513, located in Ypsilanti, Michigan, was sentenced to six months of imprisonment, followed by two years of probation. He was also ordered to pay restitution in the amount of \$56,014. In October 2024, Miller had pleaded guilty to one count of bank fraud, in violation of 18 U.S.C. 1344(2). The OLMS investigation found that in October 2018, Miller obtained a debit card attached to the union's bank account without the knowledge and approval of other union officers. From June 2018 through May 2021, Miller used the debit card to make at least 184 unauthorized personal purchases totaling \$11,259 for flights, hotel rooms, rental cars, and at retail stores, and to withdraw \$700 from the union's bank account. Miller also issued approximately 38 unauthorized checks to himself and a family member totaling \$46,737. To conceal his theft, Miller forged another officer's signature on at least 20 of the unauthorized checks.

Former Union Official Sentenced for Wire Fraud with Over \$150,000 Union Loss

In July 2025, in the United States District Court for New Jersey, Raymond Woodall Sr., former Business Manager of Iron Workers Local 11, located in Bloomfield, New Jersey, was sentenced to one year of probation and 50 hours of community service. He was also ordered to pay restitution of \$150,000. In January 2025, Woodall had pleaded guilty to one count of wire fraud and one count of making or subscribing to a false tax return, in violation of 18 U.S.C. 1343 and 26 U.S.C. 7206(1), respectively. The investigation found that Woodall enriched himself and others by fraudulently receiving hundreds of thousands of dollars in personal benefits for himself, his friends, and others at dozens of sporting events, music concerts, and other entertainment venues, through his employment at

the union, based on millions of dollars that Woodall caused the union to spend on advertising. Woodall concealed his personal receipt and use of these benefits belonging to Local 11 from both the union membership and executive board. The joint investigation was conducted with the Department of Labor's Office of Inspector General and the Internal Revenue Service - Criminal Investigations.

Former Union Officer Sentenced for Embezzlement of Over \$74,000

In September 2025, in the United States District Court for the Eastern District of Pennsylvania, Susan E. Miller, former Treasurer of American Postal Workers Union (APWU) Local 95, located in Lancaster, Pennsylvania, was sentenced to four years of probation and 100 hours of community service. Miller was also ordered to attend Gamblers Anonymous or a similar treatment program. Miller was ordered to pay \$40,100 in remaining restitution and a \$1,000 fine. Miller previously paid \$34,159 in restitution. In March 2025, Miller had pleaded guilty to one count of embezzling \$74,259 in union funds, one count of false reporting, and one count of false records, in violation of 29 U.S.C. 501(c), 29 U.S.C. 439(b), and 29 U.S.C. 439(c), respectively. The OLMS investigation found that Miller wrote at least 137 unauthorized union checks to herself worth \$68,818 and made at least 128 unauthorized charges on the union credit card totaling \$5,441, all of which were for her own personal benefit.

2. Protecting Union Democracy

Title IV of the LMRDA establishes standards for conducting democratic 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. 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 the timely resolution of union officer election complaints, which is measured by the average number of days between the agency's receipt of a complaint and its resolution. OLMS started with an original baseline of 92 days. In FY 2025, OLMS narrowly missed the decreased target of 65 elapsed days with an average resolution time of 68.87 days. OLMS projects and tracks the number of election investigations and supervised elections, although both are dependent on the volume of election complaints received and are therefore outside of OLMS' direct control. For this reason, OLMS does not project the number of lawsuits filed or voluntary compliance agreements to be filed or executed each year.

Under Title III of the LMRDA, OLMS 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.

OLMS Performance Goal – Union Democracy	FY 2025 Target	FY 2025 Results
Number of Days to Resolve Election Complaints	65	68.87

OLMS Enforcement Statistics – Union Democracy	FY 2025 Projection	FY 2025 Results
Election Investigations Conducted	98	95
Lawsuits Filed	N/A	3
Voluntary Compliance Agreements Obtained	N/A	14
Supervised Elections Completed	27	16
Trusteeship Investigations	22	30

The following summaries highlight some of the most significant OLMS election investigations completed during FY 2025:

Department Supervised New Election After Filing Suit Against TWU Local 568

In May 2022, in the United States District Court for the Southern District of Florida, the Department filed suit against Transport Workers Union (TWU) Local 568, located in Miami, Florida, seeking to nullify the union’s 2021 election of officers. The complaint alleged that the union violated Section 401(e) of the LMRDA by improperly disqualifying a member in good standing from running for president without first providing the Title I due-process protections required before imposing such discipline. In March 2024, a settlement order was signed by the court for OLMS to supervise the next regularly scheduled union election. The supervised election was conducted in December 2024.

RWDSU Local 3 Agreed to Hold a New Election Under OLMS Supervision

In November 2024, OLMS entered into a voluntary compliance agreement with Retail, Wholesale and Department Store Union (RWDSU) Local 3, located in New York, New York. The union agreed to conduct a new election and installation for the offices of secretary-treasurer and seven vice presidents under OLMS supervision. The investigation determined that Local 3 failed to elect its officers by secret ballot. The union also failed to provide adequate safeguards to ensure a fair election when a campaign flyer was left visible on a polling site voting table. The investigation also found that the union distributed a Spanish ballot with significant translation issues, potentially causing confusion among members. Finally, the investigation uncovered several issues with election safeguards, including the union’s failure to maintain all election records for the required year and a lack of effort to resolve challenged ballots. The supervised election was conducted in March 2025.

Department Filed Suit Against UAW Local 140

In November 2024, in the United States District Court for the Eastern District of Michigan, the Department filed suit against United Automobile Workers (UAW) Local 140, located in Warren, Michigan, seeking to nullify the union’s May 2024 election for the offices of president, trustee, and executive board member at large. The complaint alleged that the union failed to ensure that only eligible voters were allowed to vote and that voters only voted once, in violation of Section 401(c) of the LMRDA. The complaint further alleged that the union prevented observers from witnessing the opening and counting of the absentee ballots and from observing the initial stages of the ballot tally, also in violation of Section 401(c). Finally, the complaint alleged that the union failed to preserve the

envelopes used by absentee voters and all the ballot request slips completed by voters, in violation of Section 401(e) of the LMRDA. Taken together, these violations brought into question the integrity of the election. In May 2025, a settlement order was signed by the court for OLMS to supervise the next regularly scheduled union election. The supervised election is scheduled for May 2026.

Department Filed Suit Against SIA

In December 2024, in the United States District Court for the District of Utah, the Department filed a second suit against SkyWest InFlight Association (SIA), located in Salt Lake City, Utah. The first suit was filed in July 2024. This second suit seeks to nullify the union's September 2024 election of representatives. The complaint asserts SIA improperly disqualified a member in good standing for an alleged breach of loyalty without the due-process safeguards Title I requires before such discipline, violating Section 401(e) of the LMRDA.

In August 2025, in the United States District Court for the District of Utah, the Department filed a third suit against SIA, this time seeking to nullify the January 2025 election for the officer positions of president and secretary. The complaint alleged that SIA failed to provide a reasonable opportunity to nominate when it did not notify members of nominations and only permitted incumbent officers to nominate executive officer candidates, in violation of Section 401(e) of the LMRDA. The complaint also alleged that the union imposed an unreasonable candidate qualification requiring members to have prior experience to be eligible for executive leader positions, resulting in 99% of SIA's members being ineligible to run for either national president or national secretary, in violation of Section 401(e) of the LMRDA. Finally, the complaint raises the same issue as asserted in the second suit: that SIA improperly disqualified a member in good standing for an alleged breach of loyalty without due process. Litigation is pending on all three lawsuits.

CJA Local 503 Agreed to Hold a New Election Under OLMS Supervision

In January 2025, OLMS entered into a voluntary compliance agreement with Carpenters Local 503, located in Oregon City, Oregon. The union agreed to conduct new nominations, a new election, and installation for all officer positions under OLMS supervision. The investigation determined that Local 503 failed to provide a reasonable nomination opportunity and proper election notice by mailing the combined nomination-and-election notice to members at known bad addresses. The union also denied members the opportunity to vote by limiting polling hours, locating polling sites too far away, and failing to offer absentee ballots. The supervised election was conducted in June 2025.

UAW Local 2209 Agreed to Hold a New Election Under OLMS Supervision

In February 2025, OLMS entered into a voluntary compliance agreement with the United Auto Workers (UAW) Local 2209, located in Roanoke, Indiana. The union agreed to conduct new nominations, a new election, and installation for the Unit I Chairperson under OLMS supervision. The investigation determined that employer funds were improperly used to support the candidacy of an incumbent officer, including the filming of a campaign video inside the General Motors Fort Wayne Assembly Plant. Additionally, the investigation uncovered the misuse of both union and employer funds during campaign activities, such as campaigning during orientation classes and distributing campaign stickers for the incumbent officer along with Local Agreements at the General Motors Fort Wayne Assembly Plant. The supervised election was conducted in April 2025.

SLTA Agreed to Hold a New Election Under OLMS Supervision

In February 2025, OLMS entered into a voluntary compliance agreement with the Secondary Lay Teachers Association (SLTA), located in West Seneca, New York. The union agreed to conduct new nominations, a new election, and installation of officers under OLMS supervision. The investigation determined SLTA failed to provide ballot secrecy when each ballot contained the voter's name. Additionally, the union improperly applied a candidate qualification requirement when it amended its constitution, after nominations, to allow a retired former officer to seek office. Finally, the union denied members a reasonable opportunity to nominate when its building representatives canvassed members at work locations for nominees rather than hold a nomination meeting. The supervised election was conducted in April 2025.

AFGE Local 2145 Agreed to Hold a New Election Under OLMS Supervision

In February 2025, OLMS entered into a voluntary compliance agreement with American Federation of Government Employees (AFGE) Local 2145, located in Richmond, Virginia. The union agreed to conduct nominations and an election for the offices of president, executive vice president, and trustee chairman under OLMS supervision. The investigation determined that Local 2145 had not held an election for these positions in more than three years. The supervised election was conducted in May 2025.

APWU Local 7043 Agreed to Hold a New Election Under OLMS Supervision

In April 2025, OLMS entered into a voluntary compliance agreement with American Postal Workers Union (APWU) Local 7043, located in Florissant, Missouri. The union agreed to conduct new nominations, if necessary, and a new election for the offices of president, vice president, secretary treasurer, and clerk craft director under OLMS supervision. The investigation determined that Local 7043 failed to mail out a proper notice of election, denied members the opportunity to vote, failed to provide adequate election safeguards, failed to follow the constitution and bylaws, and failed to maintain election records. The supervised election was conducted in July 2025.

APWU Local 295 Agreed to Hold a New Election Under OLMS Supervision

In May 2025, OLMS entered into a voluntary compliance agreement with American Postal Workers Union (APWU) Local 295, located in Detroit, Michigan. The union agreed to conduct a new election of officers under OLMS supervision. The investigation determined that Local 295 failed to conduct the new election that was ordered by the Local 295 Election Committee and affirmed by the APWU National Election Appeals Committee following an internal finding that the local election committee counted mail ballots that were sent without a means to identify the voter and determine eligibility prior to the tally. The investigation confirmed that Local 295 counted ballots without confirming the eligibility of voters. The investigation also determined that the union failed to make reasonable efforts to update its mailing list for ballot packages from eligible voters that were returned as undeliverable. The supervised election was conducted in September 2025.

Department Supervised New Election After Filing Suit Against PSO's United

In March 2023, in the United States District Court for the District of Maryland, the Department filed suit against Protective Service Officers United (PSO's United), located in Fort Washington, Maryland, seeking to nullify the union's September 2022 election of officers. The complaint alleged that the union failed to mail its members notice of new voting times at all locations, and new voting procedures and location at one worksite, in violation of Section 401(e) of the LMRDA. The complaint also alleged the union failed to provide adequate safeguards to ensure a fair election when it permitted two members to

walk the ballot box around a worksite during the first and second shifts, in violation of Section 401(c) of the LMRDA. In May 2025 the court granted the Secretary's motion for summary judgment calling for a remedial election for the offices of president and three trustees under OLMS supervision. The supervised election was conducted in September 2025.

AFGE Local 1006 Agreed to Hold a New Election Under OLMS Supervision

In June 2025, OLMS entered into a voluntary compliance agreement with American Federation of Government Employees (AFGE) Local 1006, located in Fort Worth, Texas. The union agreed to conduct a new election of officers under OLMS supervision. The investigation determined that Local 1006 failed to take reasonable steps to update its membership mailing list prior to sending the election notice despite knowing that they did not have any contact information for at least 47 members. The investigation also determined that Local 1006 failed to find updated addresses for returned undeliverable election notices and did not mail election notices to members who recently joined. Finally, the investigation determined that the employer-owned email system was used to obtain contact information for members, which was then used to send campaign materials to members. The supervised election was conducted in October 2025.

ILA Local 1694 Agreed to Hold a New Election Under OLMS Supervision

In August 2025, OLMS entered into a voluntary compliance agreement with International Longshoremen's Association (ILA) Local 1694, located in Wilmington, Delaware. The union agreed to conduct a new election and installation for two business agent positions under OLMS supervision. The investigation determined that Local 1694 improperly applied a candidate eligibility requirement and denied a member in good standing the right to be a candidate. The supervised election was conducted in October 2025.

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 their employees, employers, labor relations consultants, and surety companies. To this end, OLMS administers a comprehensive reporting and disclosure program. OLMS 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](#).

In FY 2025, OLMS maintained its [initiative](#) to increase the disclosure of arrangements between employers and labor consultants. "Persuader activity" refers to efforts by a consultant, working under an arrangement with an employer, to influence employees to exercise or not to exercise their rights to

organize and engage in collective bargaining. The initiative also encompasses employers that obtain information from employees or labor unions involved in a labor dispute. In 2025, OLMS collected a combined 1,364ⁱ Form LM-10 employer persuader reports (checking Items 8.e. and 8.f) and Form LM-20 consultant reports disclosing such employer-consultant agreements or arrangements.

OLMS received, processed, and made the following reports publicly available in FY 2025:

OLMS LMRDA Reports Administration	FY 2025
Form LM-1 Labor Organization Information Reports	204
Form LM-2 Labor Organization Annual Reports	5,014
Form LM-3 Labor Organization Annual Reports	9,429
Form LM-4 Labor Organization Annual Reports	5,887
Simplified Labor Organization Annual Reports	878
Form LM-10 Employer Reports	587
Form LM-15 Trusteeship Reports (initial, semiannual, and 15A)	422
Form LM-16 Terminal Trusteeship Reports	74
Form LM-20 Labor Relations Consultant Agreement and Activities Reports	1,046
Form LM-21 Labor Relations Consultant Receipts and Disbursements Reports	81
Form LM-30 Labor Organization Officer and Employee Reports	382
Form S-1 Surety Company Annual Reports	129
Total Reports	24,133

OLMS utilizes a web-based Electronic Forms System (EFS) that filers use to complete and submit LM reports. The system allows any of these filers to complete and electronically submit an LM report without 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 opens an investigation to obtain compliance. The same procedures apply when reports due from employers, labor relations consultants, and union officers and employees, are not timely or properly completed: OLMS also will pursue delinquent and deficient reports. The latter investigations are known as “Special Reports” cases. OLMS tracks the numbers of delinquent and deficient reports and special reports cases completed.

ⁱ July 8, 2026 (a revision on page 11 to adjust the calculation of the combined number of LM-10 employer persuader reports received for FY 2025.)

During FY 2025, 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 or more years in a row. To prevent chronic delinquency, OLMS reaches out to unions who have filed late in the previous two or more years. These are the unions most in danger of becoming and remaining chronically delinquent. The goal was to remove 347 unions from the list by assisting them to file on time. By year’s end, OLMS had exceeded this goal and removed 543 filers from the chronic delinquency watch list.

OLMS Performance Goal – Reporting and Disclosure	FY 2025 Target	FY 2025 Results
Reduce the Chronically Delinquent Watch List of 1,157 unions by 30% (Target 810 or fewer)	≤ 810	614

OLMS Enforcement Statistics – Reporting and Disclosure	FY 2025 Plan	FY 2025 Results
LM-2/3/4 Delinquent Reports Cases Completed	1,323	1,132
LM-2/3/4 Deficient Reports Cases Completed	234	219
Special Reports Cases Completed	112	137

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 2025, OLMS certified employee protections for 1,881 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 229 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. Regulatory Initiatives

On January 13, 2025, OLMS finalized revisions to the Form LM-10 Employer Report, the Form LM-20 Agreement and Activities Report, and the Form LM-21 Receipts and Disbursements Report, as well as their corresponding instructions. These forms, among other things, collect information from employers and labor relations consultants who obtain information about workers or unions in connection with a labor dispute or persuade workers concerning their union organizing rights. The revisions enhance OLMS’ ability to identify individuals or entities that owe a report but have not filed it. By cross-matching the three sets of reports (Forms LM-10, LM-20, and LM-21), OLMS ensures that each report is accompanied by all required companion filings. This process relies on the identification

of responsible parties within the reports. However, because names can be ambiguous, abbreviated, misspelled, or inconsistently reported, incorporating Employer Identification Numbers (EINs) enables OLMS to more accurately determine whether a specific entity has failed to submit a required report. Employers and their labor relations consultants provide the EIN of the filer and other parties to the agreement. The revisions require: (1) Employers and their labor relations consultants to provide the EIN of the filer and other parties to the agreement, (2) Employers and their labor relations consultants to provide the email addresses of other parties to the agreement, which will not be made public on the submitted forms, (3) Primary consultants to specify the independent contractors/sub-consultants who performed the reportable activity, and (4) Sub-consultants to specify the primary consultants through which they entered into a reportable agreement.

On July 1, 2025, OLMS proposed a revision to the Form LM-2, Form LM-3, and Form LM-4 Labor Organization Annual Reports. The LMRDA requires certain reporting and disclosure requirements for labor organizations, their officers and employees, employers, labor relations consultants, and surety companies. Under the LMRDA, every labor organization must file with OLMS an annual financial report showing total annual receipts, disbursements, assets, and liabilities of the union. There are currently three forms for this purpose—Forms LM-2, LM-3, and LM-4—with the form required determined by total annual receipts. Under current regulations, labor organizations (not in trusteeship) with \$250,000 or more in annual receipts must file Form LM-2; those with less than \$250,000 may choose to file Form LM-3; and those with less than \$10,000 may choose to file Form LM-4. These thresholds have remained unchanged for over 20 years.

OLMS proposed to increase each filing threshold to higher values: labor organizations with \$450,000 or more in annual receipts must file Form LM-2; those with less than \$450,000 may choose to file Form LM-3; and those with less than \$25,000 may choose to file Form LM-4. These increases are necessary to reflect economic changes and reduce unnecessary reporting burdens on labor organizations whose total receipts, prior to adjusting for inflation, should not necessitate greater filing requirements. By increasing the filing thresholds in a manner proportionate to inflation, this proposed rule ensures that only those unions whose total receipts have kept pace with inflation remain subject to the most detailed reporting requirements.

Additionally on July 1, 2025, OLMS proposed a revision to the Form LM-30 Labor Organization Officer and Employee Report (Form LM-30). The Form LM-30 requires every labor union officer and employee to report actual or potential conflicts of interest involving their own personal financial interests, as well as that of their spouse or “minor child,” and that of their labor organization. These conflicts of interest include any directly or indirectly held interest or derived income or benefit from an employer whose employees the labor organization represents, or from a business that deals with the labor organization or its trust or a business that deals in substantial part with a represented employer of the union, or has received payments from certain other employers or a labor relations consultant to an employer. Currently, “minor child” is defined as a “son, daughter, stepson, or stepdaughter under 21 years of age.” OLMS proposed to amend its regulations to redefine “minor child” as a “son, daughter, stepson, or stepdaughter under the age of 18.” OLMS considers requiring union officers and employees to disclose financial interests or transactions involving their children or stepchildren aged 18 to 20 may impose unnecessary administrative burdens without meaningfully advancing transparency or detection of conflicts of interest.

6. Compliance Assistance & Outreach

In FY 2025, 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 maintained 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 2025, OLMS conducted 84 compliance assistance seminars and recorded 11,327.25 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, working with them to improve the compliance performance of their over 16,000 affiliates. During FY 2025, the VCP program included 50 partner national or international unions. 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 2024 (the latest available union fiscal year) at 83% overall (86% for VCP unions and 69% for non-VCP unions). OLMS leadership met directly with the presidents and secretary-treasurers of 23 VCP member unions in FY 2025. In total, OLMS distributed 42 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 2025, OLMS continued sending a letter to labor unions who were petitioners seeking an NLRB representation election, notifying them of the employer and consultant reporting requirements for 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 2025, 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.
- OLMS advanced 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, employers and/or unions together to collaboratively address workplace 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 2025, OLMS attended and presented at 15 events and conferences to build relationships with external stakeholders in multifarious industries across the nation.

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