



May 22, 2026

[Redacted]

Dear [Redacted]:

This is to advise you of the disposition of your complaint filed with the Secretary of Labor alleging that violations of Title III of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA) occurred with respect to the imposition of a trusteeship by International Association of Heat & Frost Insulators and Allied Workers (HFIAW) over HFIAW Local 30 in Syracuse, New York.

Pursuant to Sections 340 and 601 of the LMRDA, an investigation was conducted by the Office of Labor-Management Standards. After carefully reviewing the investigative findings, and after consulting with the Solicitor of Labor, we have determined that legal action is not warranted in this case. We are, therefore, closing our file as of this date.

The basis for this decision is set forth in the enclosed Statement of Reasons.

Sincerely,

[Redacted Signature]

Chief, Division of Enforcement

Enclosure

cc: [Redacted], Associate Solicitor
Civil Rights and Labor-Management Division

U.S. Department of Labor

Office of Labor-Management Standards
Suite N-5119
200 Constitution Ave., NW
Washington, D.C. 20210
(202) 693-0143



May 22, 2026

Terrence Larkin, General President
International Association of Heat & Frost Insulators and Allied Workers
9602 Martin Luther King Highway
Lanham, MD 20706

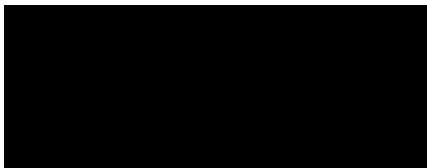
Dear President Larkin:

This is to advise you of the disposition of a complaint filed with the Secretary of Labor alleging that violations of Title III of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA) occurred with respect to the imposition of a trusteeship by International Association of Heat & Frost Insulators and Allied Workers (HFIAW) over HFIAW Local 30 in Syracuse, New York.

Pursuant to Sections 340 and 601 of the LMRDA, an investigation was conducted by the Office of Labor-Management Standards. After carefully reviewing the investigative findings, and after consulting with the Solicitor of Labor, we have determined that legal action is not warranted in this case. We are, therefore, closing our file as of this date.

The basis for this decision is set forth in the enclosed Statement of Reasons.

Sincerely,



Chief, Division of Enforcement

Enclosure

cc: [Redacted], Associate Solicitor
Civil Rights and Labor-Management Division

Statement of Reasons for Dismissing the Complaint

Alleging the International Association of Heat and Frost Insulators and Allied Workers Improperly Imposed a Trusteeship over its Subordinate Body, Local 30 on June 14, 2024

This Statement of Reasons is in response to a complaint filed with the United States Department of Labor (Department) on July 12, 2024, by a member of the International Association of Heat and Frost Insulators and Allied Workers (HFIAW or International) alleging that the union imposed a trusteeship over Local 30 (Union) for a purpose not allowable under Section 302 of the Labor-Management Reporting and Disclosure Act of 1959 (the Act or LMRDA), 29 U.S.C. § 462.

Specifically, the complainant alleged that the International imposed a trusteeship over Local 30 as a retaliatory measure for the complainant filing and refusing to withdraw an election complaint filed on the local's December 3, 2023 election of officers. The complainant claimed that the International executed the trusteeship over Local 30 because of the election complaint, and that the trusteeship did not serve a lawful purpose as required by Section 302 of the LMRDA. For the following reasons, the complaint is dismissed.

Section 302 of the LMRDA permits a parent labor organization to impose a trusteeship on subordinate bodies for the following purposes: (1) correcting corruption or financial malpractice; (2) assuring the performance of collective bargaining agreements or other duties of a bargaining representative; (3) restoring democratic procedures; or (4) otherwise carrying out the legitimate objects of such labor organization. 29 U.S.C. § 462. A trusteeship established by a parent body for a valid purpose, in conformity with the procedural requirements of its constitution and bylaws, is presumed valid for eighteen months from the date of its establishment and is not subject to attack during such period except by clear and convincing proof that the trusteeship was not established or maintained in good faith for a purpose allowable under Section 302 of the LMRDA. 29 U.S.C. § 464(c).

The Department's investigation determined that multiple witnesses and monthly membership meeting minutes for Local 30 corroborated that on June 20, 2024, an international officer advised members that the election protest was a reason for the trusteeship. In addition, the Department's investigation disclosed that, to the extent the International might have had mixed motives in establishing the trusteeship over the Union, it also had an allowable purpose for the imposition. In his June 14, 2024 letter to the Union's Business Manager, Kenneth Williams, General President Terrence Larkin stated that he was placing the Union into trusteeship because the Union's "officers [were] failing to work together . . . to perform Local 30's duties as a bargaining representative," which "negatively impacted the operation of the union and the union's apprenticeship program." For example, the Union had to suspend meetings and apprenticeship training for a couple months in 2024 because the officers were unable to

timely agree on a new office building lease. A trusteeship is lawfully imposed so long as a labor organization has at least one allowable purpose for the imposition. *See, e.g., Boardman v. Serv. Emps. Int'l Union Local 73*, No. 18 C 2728, 2022 WL 4602115 at *18 (N.D. Ill. Sept. 30, 2022) (“a claim that a trusteeship was retaliatory fails if ‘there was at least one proper purpose for imposing the trusteeship’”); *Nat'l Ass'n of Letter Carriers v. Sombrotto*, 449 F.2d 915, 923 (2d Cir. 1971) (“[O]ne proper purpose for imposing a trusteeship would suffice”).

To the extent that the Department determined that the trusteeship may have been imposed for an unlawful purpose, this issue is moot because Local 30 agreed to lift the trusteeship and hold a new election of officers under the supervision of the Secretary of Labor within the eighteen-month presumption of validity period for trusteeships in section 304(c) of the LMRDA. New officers were elected and installed on February 6, 2025.

Accordingly, this matter does not require further action on the part of the Department, and we are closing our file.