

**U.S. Department of Labor**

Office of Labor-Management Standards  
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September 25, 2025

Mr. Daniel Bellino, President  
Major League Baseball Umpires Association  
c/o Zoe Palitz, Esquire  
Altshuler Berzon, LLP  
177 Post Street, Suite 300  
San Francisco, CA 94102

Case Number: 320-6030829( )  
LM Number: 541736

Dear President Bellino:

This office has recently completed an audit of Major League Baseball Umpires Association (MLBUA) under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). As discussed during the exit interview with Secretary Treasurer Will Little, Administrator Phil Janssen and Attorney Zoe Palitz on September 24, 2025, the following problems were disclosed during the CAP. The matters listed below are not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

Recordkeeping Violations

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records for at least five years by which each receipt and disbursement of funds, as well as all account balances, can be verified, explained, and clarified. As a general rule, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers, and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing additional information. For money it receives, the labor organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of MLBUA's 2024 records revealed the following recordkeeping violations:

### 1. Reimbursed Expenses to Officers and Employees

The union failed to retain adequate documentation for reimbursed expenses incurred by you, Mr. Janssen, and several officers totaling at least \$7,500. For example, the documentation retained for the business use of personal cell phones was not sufficient because the way the reimbursement was calculated was unclear and varied greatly.

As noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

### 2. Meal Expenses

MLBUA did not require officers and employees to submit itemized receipts for meal expenses totaling at least \$2,100. The union must maintain itemized receipts provided by restaurants to officers and employees. These itemized receipts are necessary to determine if such disbursements are for union business purposes and to sufficiently fulfill the recordkeeping requirement of LMRDA Section 206.

### 3. Reimbursed Auto Expenses

Union officers and employees who received reimbursement for business use of their personal vehicles did not retain adequate documentation to support payments to them totaling at least \$1,200 during 2024. The union must maintain records which identify the dates of travel, locations traveled to and from, and number of miles driven. The record must also show the business purpose of each use of a personal vehicle for business travel by an officer or employee who was reimbursed for mileage expenses.

### 4. Lack of Salary Authorization

MLBUA did not maintain records to verify that the salaries reported in Schedule 12 (Disbursements to Employees) of the LM-2 was the authorized amount and therefore was correctly reported. The union must keep a record, such as meeting minutes, to show the current salary authorized by the entity or individual in the union with the authority to establish salaries.

Based on your assurance that MBLUA will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

### Reporting Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The

Labor Organization Annual Report Form LM-2) filed by MLBUA for the fiscal year ended December 31, 2024, was deficient in the following areas:

1. Acquire/Dispose of Property

Item 15 (During the reporting period did your organization acquire or dispose of any assets in any manner other than by purchase or sale?) should have been answered, "Yes," because the union gave away engraved crystal plates and Yeti coolers totaling least \$8,000 to retired members during the year. The union must identify the type and value of any property received or given away in the additional information section of the LM report along with the identity of the recipient(s) or donor(s) of such property. The union does not have to itemize every recipient of such giveaways by name. The union can describe the recipients by broad categories if appropriate such as "members" or "new retirees."

2. Failure to Itemize Disbursements

MLBUA did not properly report some "major" disbursement transactions in Schedules 15-19. A "major" transaction includes any individual transaction of \$5,000 or more or total transactions to any single entity or individual that aggregate to \$5,000 or more during the reporting period and which the local cannot properly report elsewhere in Statement B (Receipts and Disbursements). The audit found that the union incurred charges on the union credit card totaling more than \$9,000 (in the aggregate) at Omni Montelucia in Arizona for purposes of the annual retreat and incurred lodging charges totaling more than \$7,300 (in the aggregate) at the Hyatt Grand Central in New York for contract negotiations. However, neither of these vendors were separately identified in Schedules 15-19. It appears these disbursements were erroneously included in the "all other disbursements" figures reported in Schedules 15 (Representational Activities) and 18 (General Overhead) on the detailed summary page.

3. Disbursements to Officers

The union did not include meal expenses charged to the union credit card on behalf of officers totaling at least \$2,300 in the amounts reported in Schedule 11 (All Officers and Disbursements to Officers), Column F (Disbursements for Official Business). It appears that the MLBUA erroneously reported these amounts in Schedules 15 through 19.

Additionally, the union disbursed payments to several officers totaling at least \$2,500 for missed "crew chief" pay for games that officers were unable to work due to contract negotiations. These payments are a form of compensation that must be reported as salary in Column D (Gross Salary) of Schedule 11. It appears the union erroneously reported these payments in Column F of Schedule 11.

The union must report in Column F of Schedules 11 and 12 direct disbursements to officers and employees for reimbursement of expenses they incurred while conducting

union business. In addition, the union must report in Column F of Schedules 11 and 12 indirect disbursements made to another party (such as a credit card company) for business expenses union personnel incur. However, the union must report in Schedules 15 through 19 indirect disbursements for business expenses union personnel incur for transportation by public carrier (such as an airline) and for temporary lodging expenses while traveling on union business. The union must report in Column G (Other Disbursements) of Schedules 11 and 12 any direct or indirect disbursements to union personnel for expenses not necessary for conducting union business.

Additionally, all gross compensation paid to officers must be reported in Column D of Schedule 11, including disbursements for “lost time” or time devoted to union activities.

I am not requiring that MLBUA file an amended LM report for 2024 to correct the deficient items, but the union has agreed to properly report the deficient items on all future reports it files with OLMS.

#### Other Violation

##### Inadequate Bonding

The audit revealed a violation of LMRDA Section 502 (Bonding), which requires that union officers and employees be bonded for no less than 10 percent of the total funds those individuals or their predecessors handled during the preceding fiscal year. Although the amount of the bond amount is sufficient, it appears the current bonding coverage is deficient because the coverage is based on a “per occurrence” basis rather than a “per person” basis. Section 502 requires that “Every officer....of any labor organization...who handles funds or other property thereof shall be bonded to provide protection against loss by reason of acts of fraud or dishonesty *or through connivance with others.*” Thus, regardless of whether acting individually or with others, a union must be protected against the loss as to every officer involved. A bond that only protects the union from loss “per occurrence” (i.e. as to one officer in situations in which multiple bonded officers are involved) would not be compliant. The bond must be amended to ensure that coverage is on a “per person” basis, or alternatively, receive written assurance from the bonding company that the definition of a single loss will be treated on a per person basis.

MLBUA must obtain adequate bonding coverage for its officers and employees immediately. Please provide proof of bonding coverage to this office as soon as possible, but not later than October 16, 2025.

#### Other Issue

##### Written Policies

As I discussed during the exit interview, the audit revealed that MLBUA does not have clear written policies in areas of key disbursements, including the types of expenses personnel may claim for reimbursement (e.g. cell phone reimbursement, home office expenses, etc.) and the

types of expenses that may be charged to union credit cards. The audit also revealed that the union compensates officers for lost pay during contract negotiations; however, this is an area where the union also lacks a clear policy. OLMS recommends that unions adopt written guidelines concerning such matters.

I want to extend my personal appreciation to Major League Baseball Umpires Association for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,



Senior Investigator

cc: Will Little, Secretary Treasurer  
Quinn Wolcott, Vice President  
Zoe Palitz, Esquire