



February 18, 2020

Andrew Davis  
Chief of the Division of Interpretations and Standards  
Office of Labor-Management Standards  
U.S. Department of Labor  
200 Constitution Avenue NW, Room N-5609  
Washington, DC 20210

Re: Comments in Response to the Department of Labor's Notice of Proposed Rulemaking Titled "Labor Organization Annual Financial Reports: Coverage of Intermediate Bodies," RIN 1245-AA08, 29 CFR Part 401 (December 17, 2019)

Dear Mr. Davis:

The Center for Worker Freedom (CWF) is a nonprofit, educational organization that is dedicated to warning the public about the causes and consequences of unionization. CWF supports freedom of association and believes all workers should have the right to decide for themselves whether or not they would like to belong to a labor organization.

**The Center for Worker Freedom strongly supports the Department of Labor's proposed rule requiring intermediate bodies to file LM-2 reports if they are subordinate to national or international unions that "represent" private sector workers. This rule would help American workers by promoting transparency and preventing union corruption, as well as giving some workers additional rights.**

Currently, American private sector workers can trace their dues by researching their union's LM-2 reports. However, sometimes the dues are transferred to public sector intermediate bodies that are currently not required to report their finances. This rule would require many of these intermediate bodies to complete LM-2 reports, allowing workers to more fully trace how their dues are spent. Given the serious corruption in some unions today and the amount of influence unions have over politics, it is very important that workers can track their dues.

In addition, this rule would also protect additional workers by giving them rights, such as the right to participate in elections. Another right would allow them to sue the unions to enforce these rights. This rule would also protect workers by limiting how and when unions can punish their members and ensure that the elections are legitimate, i.e. require secret ballot elections. Third, workers would be protected from bad actors in the labor union because union officials must have surety bonds.

**Because this proposed rule would protect workers by requiring labor unions to submit financial reports and become transparent, the Center for Worker Freedom strongly supports the Labor Department's proposed intermediate bodies rule.**

Sincerely,

Olivia Grady  
Senior Fellow