



July 29, 2019

The Honorable Patrick Pizzella
Acting Secretary of Labor
Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for DOL-OLMS
Office of Management and Budget
725 17th Street NW, Rm 10235
Washington, DC 20503

Re: Comments in Response to Department of Labor Notice of Proposed Rulemaking titled "Labor Organization Annual Financial Reports for Trusts in which a Labor Organization is Interested, Form T-1," RIN 1245-AA09, 29 CFR Parts 403 (May 30, 2019)

Dear Acting Secretary Pizzella:

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 is interested in the Department of Labor's proposed rule on reintroducing Form T-1 because the rule would help American workers. Because the T-1 form provides transparency for American workers, CWF strongly supports the Labor Department's rule.

Requiring labor unions with over \$250,000 in total annual receipts to file a Form T-1 (if they contribute greater than 50% of a trust's receipts or select most of the trust's governing board) would help workers. This proposed rule would allow workers to see where their dues are spent.

All union members should know how their union dues are spent.

Currently, labor unions can circumvent the LMRDA's reporting requirements by transferring money from a union to a trust. The proposed rule mentions several instances where large sums of money were transferred from locals to trusts. Because the money was transferred to trusts, union members do not know where the funds were spent.

One example of a trust is a strike fund to support workers while they strike. However, the United Auto Workers (UAW) has used their strike fund of \$721 million dollars to build a luxury cabin for former UAW President Dennis Williams. Worker dues funded this cabin.

Because this proposed rule would provide transparency to American union members, the Center for Worker Freedom strongly supports the Labor Department's proposed rule on Form T-1.

Sincerely,

Olivia Grady
Senior Fellow