

September 9, 2020

Andrew Auerbach
U.S. Department of Labor
Office of Labor-Management Standards
N-1519
200 Constitution Ave NW
Washington, DC 20210



Violation of the LMRDA by UFCW Locals

Dear Mr. Auerbach,

I am writing to bring to your attention a violation of the Labor-Management Reporting and Disclosure Act of 1959 (“LMRDA”). The violation concerns 59 locals of the United Food and Commercial Workers International Union (“the locals”), which have apparently failed to file a copy of their bylaws with the Office of Labor-Management Standards.

The LMRDA was created with the intent of holding private-sector labor organizations accountable by establishing a system of periodic reporting requirements. The relevant section of the LMRDA, 29 U.S.C. § 431(a), states (emphasis added):

*“Every labor organization shall adopt a constitution and bylaws **and shall file a copy thereof with the Secretary**, together with a report, signed by its president and secretary or corresponding principal officers...”*

The Online Public Disclosure Room (OPDR) is a tool created by OLMS [for the purpose of making widely available copies of bylaws and other documents](#). After an exhaustive OPDR search, it was determined that 59 UFCW locals are missing bylaws as required by the LMRDA. A copy of the OPDR search results is included as an appendix to this complaint.

The transparency provided by the public disclosure of these locals’ bylaws ensures union members understand their rights and responsibilities. We respectfully request that OLMS investigate the matter as necessary and proceed with such enforcement action as may be appropriate.

Sincerely,

Michael Saltsman
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