

*OLMS Must Devote More Resources
To Addressing Employer and
“Persuader” Non-Compliance with
Disclosure Laws*

August 2024 Year-to-Date Report of 2023 LM-10 and LM-21 Non-Filers

LaborLab

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Introduction

One of the key difficulties in tracking and understanding both prevalence and significance of union-busting, past and current, in the United States is the lack of filing by employers and persuader consultants who are required to do so by law. But this problem goes back at least forty years, as substantially documented by a 1984 House of Representatives Labor Subcommittee report, and reconfirmed by a recently released US Department of Labor Inspector General investigation.

[The Office of the Inspector General](#)¹ replicated the [findings² of a 1984 Congressional Subcommittee on Labor-Management Relations](#) which documented the existence of chronic underreporting of annual employer expenditures on persuader hiring (Form LM-10) and persuader annual reporting (Form LM-21). Significantly, both reached substantially identical conclusions regarding the primary cause of such underreporting: a severe lack of follow-through by the agency charged with the enforcement of such reporting, the (now) Office of Labor-Management Standards. Notwithstanding that such reporting may not be popular among employers and persuaders, it is still required by law, and unions are subject to similar annual reporting requirements which have changed significantly over the years, most recently in 2005, whereas the actual form of reporting for employers and persuaders has hardly changed at all.

Moreover, the 1984 Congressional Report documented a worsening imbalance between resources devoted by what is now OLMS to securing union reports in comparison with

¹ U.S. Department of Labor, Office of Inspector General, *OLMS Can Do More to Protect Workers' Rights to Unionize Through Enforcing Persuader Activity Disclosure*, Report No. 09-24-002-16-001 (May 3, 2024).

² House Committee on Education and Labor, Subcommittee on Labor-Management Relations, *The Forgotten Under the LMRDA: Report of the Subcommittee on Labor-Management Relations of the Committee on Education and Labor, House of Representatives, Together with Minority Views* (December 1984)

resources devoted to employer and persuader reports. That imbalance is still operative today. While there are over 20,000 unions who must file annual financial reports and around 200 employers who must report persuader payments and a somewhat lower number of persuaders who must file the annual report, it is clear from current OLMS publications that the agency devotes considerable resources to ensure reporting compliance with unions. According to OLMS's [2023 annual report](#), OLMS completed 1,329 delinquency investigations of unions and boasted that they removed 652 unions from the "chronic delinquency watch list" (unions that file late for three or more consecutive years). OLMS does not disaggregate their data on "Special Reports", of which 100 were completed in FY 2023 because these include reports such as the LM-30, so we do not know the exact number of delinquency or deficiency investigations completed by OLMS on employers hiring persuaders or the persuaders themselves.

The recent Inspector General investigation recommended OLMS make a significant improvement in securing reports from non-filers, as well as improve its own internal complaint handling system about non-reporting.

Annual reports Forms LM-10 and -21, like their union annual report counterparts, are due ninety (90) days from the close of the reporting year. In 2022, LaborLab, a non-profit watchdog organization, created a quarterly spreadsheet of all LM-10's and LM-21's owed by a triggering LM-20 had been filed (our methodology section below describes this in substantial detail). These quarterly reports not only counted the number of LM-10s and LM-21s *owed but not* filed for 2022 but listed them and included hyperlinks to the triggering reports. These reports were shared with OLMS and sadly, we did not notice much improvement in the number of non-filers who finally did file their 2022 reports. It should also be noted that LaborLab routinely files complaints with OLMS of LM-10s and LM-21s that are not filed, delinquent, or deficient, and to improve our own ability to follow-up, we have now started numbering each complaint filed.

Because of the lack of progress in 2022, we decided to repeat the process again in 2023 and each May, August, November, and February, we repeat this analysis and will continue to supply it to OLMS. We should note several caveats here regarding annual reporting: first, we only include those reports for 2022 and 2023 that are filed for that particular year. On the other hand, OLMS, from what we can tell, reports total reports

filed each year regardless of which year they are filed for. Additionally, OLMS uses a fiscal not a calendar year; we use a calendar year. Finally, Form LM-10 can be used for multiple purposes, most notably to report employer payments to unions and union officials. For this reason, the total number of LM-10s filed in one year will not include just persuader reporting, but also reports of payments to union officials as well as payments for employee surveillance, persuasion, and employer unfair labor practices.

Organization of this report

In the following report, we briefly summarize our methodology and our findings for those employers and persuaders who owe but have not yet filed 2023 LM-10 and LM-21 annual reports. We then present our results in two attached spreadsheets, discuss these findings briefly, and conclude with a simple call to action from OLMS to fulfill its obligations under the law.

Methodology used

A key part of our methodology is the “triggering” device that requires a persuader to file an LM-21 and an employer to file an LM-10. All our data comes directly from the OLMS Public Disclosure online database.

What triggers the filing of a Form LM-21? There is little ambiguity regarding which employers and persuaders owe annual reports. As the instructions for these forms, the applicable regulations, the LMRDA, and compliance assistance materials published by the agency make abundantly clear, the mere filing of a single LM-20 by a persuader in their fiscal year triggers the filing of an LM-21 annual report for that fiscal year. Even under the 2016 OLMS Special Enforcement Policy, an LM-21 without any reporting of Part B receipts and Part C disbursements is considered an acceptable, although incomplete filing. *Regardless of whether the persuader itemizes such receipts and disbursements, the LM-21 is still owed.* As the attached spreadsheet illustrates, many of those LM-21s owed but not yet filed are from new consultants who have filed only one LM-20 for 2023. *That does not absolve them of the requirement to file and for OLMS to secure copies of those filings. Nor does it remove the obligation for OLMS to contact those persuaders and secure their 2023 LM-21 filing.*

Here, the LM-20 acts as a trigger, much the same way the filing of a Form LM-1 by a labor union triggers annual reporting by way of Form LM-2, -3 or -4. Unions must continue to file these annual reports after an LM-1 filing until they file a terminal

report. For the same reason, a persuader must file an LM-21 if they file just one LM-20 in any single fiscal year. It is just that simple: securing the filing of an LM-21 all persuaders should be a straightforward process for OLMS: find an LM-20, pull the name of the filer and all subcontractors listed in item 11, and make sure they all have filed an LM-21 for that year.

What triggers the filing of an LM-10? Likewise, the mere filing of an LM-20 within a given fiscal year also triggers the filing of an annual Form LM-10 by an employer. In practice, it may be more difficult to crossmatch LM-20s with LM-10s for a variety of reasons and having done it extensively for more than two years, we can speak from experience. The persuader may not have used the correct business name, and this is particularly true for the subcontractors listed on the LM-20. Secondly, a different business address may be used on the LM-10 than the LM-20. Nevertheless, with less than 200 LM-10s for persuader activity filed per year, in our experience, the vast majority can be easily crossmatched with the LM-20 and the remainder require some additional work which is doable. It should be noted that OLMS did earlier try to require Form LM-10 to provide an Employer Identification Number for easier identification and even the recent change in the Form LM-10 requiring the reporting of federal contracts requires the inclusion of the Unique Entity Identifier, which facilitates crossmatching.

How do we construct our database? Each week, LaborLab collects and examines every Form LM-20 filed with OLMS. This information is stored in a spreadsheet. Over the year, we accumulated a database of LM-20s. It should be noted that unlike union data, which can be downloaded easily on an annual basis, the same utility is not available on the OLMS Public Disclosure website, but we must stress that we are using the same publicly available information that OLMS has access to in all our following analysis.

How do we construct the spreadsheet of LM-10s owed? To generate a spreadsheet of LM-10 forms owed, we sort that database by employer name and secondarily by address; sometimes it is possible to do this by the OLMS-assigned report number, except that in many cases a second or even third LM-10 is filed, which will have a different reporting ID. From this listing, with comparison back to the triggering LM-20, we can determine who the prime contractor is so that there is only one record for each employer; the only exception are those employers who, contrary to the instructions, file a second LM-10 for the second prime contractor (they should all be

consolidated on the same form, with separate pages for different primary persuaders). This process ends in a filter list of unique reporting obligations which represents all LM-10 reports owed. Our next step is to identify those who have actually filed.

To do this, we use the Public Disclosure database and one-by-one search for 2023 filings by the specific employer. Note that by using the Public Disclosure database, we are getting the most recent filing data. Each quarter, we use the spreadsheet from the previous quarter and note any new filings that have come in since the previous report.

How do we crossmatch employers listed in LM-20s with LM-10s? In running this crossmatch, we use both the name and trade names given in the LM-20, and we often must work through spelling errors or incomplete listings. If we are not sure we have a valid crossmatch, we do not show the report as having been filed.

Where there is a crossmatch, we record the filing date of that 2023 report and insert into this date a hyperlink to the filing, so that OLMS (or any user) may simply click the hyperlink and pull up that report for verification. We also include a hyperlink to the triggering LM-20 so OLMS may verify the existence of the trigger.

How do we construct a spreadsheet of LM-21s owed? The process for extracting the LM-21s owed is similar but different in several regards. First, the LM-20 will record not only the entity filing the LM-20, but a list of all subcontractors hired in item 11. Since those subcontractors will have an obligation to file an LM-21, it is important to capture this information, and to do so, we must first clean up the data. We frequently find that subcontractors names and organizational affiliations, if any, are inconsistently spelled, which requires additional research and crossmatching. In some cases, no information about the subcontractors' organizational affiliation is not provided; some are sole proprietors, some have business names and at least one large persuader uses code numbers instead of organizational names (which is a violation of the instructions and has been brought to OLMS's attention several times). After cleaning up the data in this fashion, we then query the database to determine how many times each subcontractor is referred to in an LM-20, either as a contractor or subcontractor. After sorting the revised list alphabetically, we then go to the OLMS Public Disclosure web page and individually crossmatch to see if there is a 2023 LM-21 filing. If there is, then the filing date is recorded in the spreadsheet and a hyperlink to that filing is embedded in the filing date. This provides us with the most current and comprehensive reporting possible under the circumstances. The data in attachments 1

and 2 are current as of July 31, 2024. It is possible that between the time this report is read and then there will be new crossmatches, but we will repeat this analysis in November 2024 and February 2025.

We have offered to share our methodology and spreadsheets for performing the non-filing analysis with OLMS and we renew that offer, including our willingness to train OLMS staff in how to apply the methodology.

Results

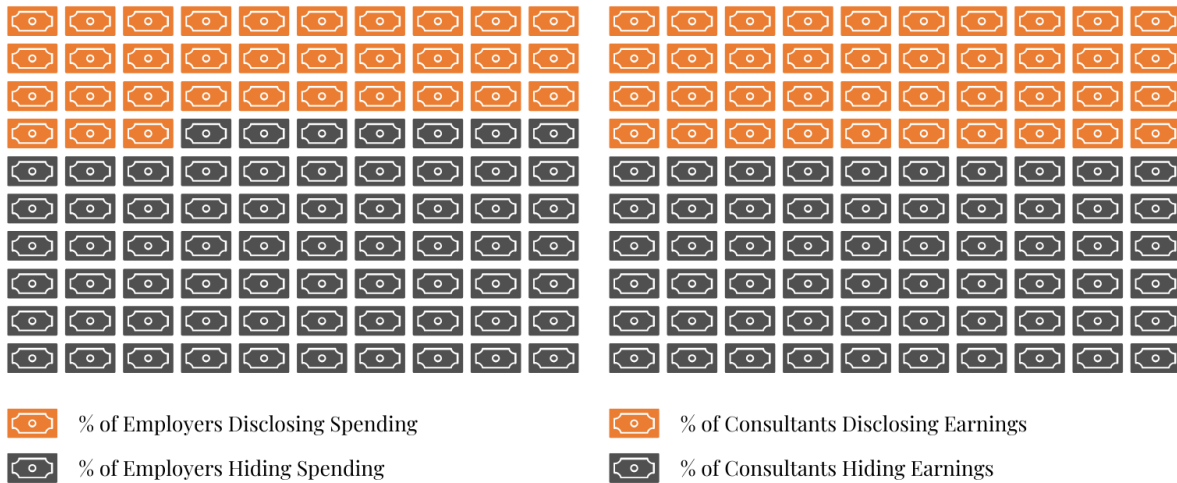
Attachment 1 presents a spreadsheet on 2023 LM-10 non-filers and Attachment 2 presents a spreadsheet examining 2023 LM-21 non-filers. For 2023, there should have been 149 employers filing LM-10s for persuader activity (there may be more filed for reporting payments to unions and union officials, but these are not reported here). **As of 7/31/24, only 54 or slightly more than one third have filed their LM-10s, and the total expenditures are slightly over six million dollars**, which falls well below the estimates of 25-30 million dollars spent by employers for persuader activity each year. Ninety-five (95) employers have failed to file their LM-10s for 2023. There is a non-filing rate of 66% six months after the LM-10 forms are due (they are due 90 days from the close of the employer's fiscal year, but most fiscal years correspond to the standard 1/1 - 12/31 fiscal year).

As indicated earlier, the triggering LM-20 hyperlink is provided in column D of this spreadsheet so OLMS can easily confirm that an LM-10 is owed. It should also be noted that LaborLab has already filed delinquency complaints with OLMS on many, if not most, of these employers.

Regarding non-filed 2023 LM-21 reports, Attachment 2 reveals that as of the end of July 2024, **barely 40% of persuaders have filed their required report**. Many of the filings that have been submitted are also deficient, for reasons including being a partial year report (some persuaders file annual reports for several weeks or several months, not for the entire year as the instructions require) or incomplete information provided on subcontractors in Part D. As with LM-10s, we have already filed complaints with OLMS for many, if not most, of these deficiencies. We have also tallied the number of times each consultant shows up in an LM-20 in 2023, and from this many have low persuader activity, but *that does not excuse them from filing*. Additionally, many are sole proprietors with little business experience, but *that does not excuse them from filing*.

EMPLOYER REPORTING

CONSULTANT REPORTING



Disclosures for 2023 as of 7/31/2024

In conclusion, we ask OLMS to simply fulfill its obligations under the law. OLMS needs to devote at least the same effort and resources to securing non-filers from employers and persuaders that they do with unions.

We will continue to provide these quarterly reports to OLMS, so they may secure the required reporting from these employers and persuaders. The disappointing lack of OLMS response from 2022 and our first quarterly report for May 2024 requires we engage our stakeholders to increase scrutiny of this process. Our largest single stakeholder group, labor organizations, are already asking why OLMS focuses so much on union annual report filing and so little on required employers and persuaders reporting.

2023 LM-10 Data

LaborLab

Employer	Hyperlink to Triggering LM-20	Street	City	State	Zip Code
A. Stucki Company	https://olmsapps.dol.gov/query/orgReport.do?rptId=872099&rptForm=LM20Form	360 Wright Brothers Dr	Moon Township	PA	15108
ACM Global Laboratories	https://olmsapps.dol.gov/query/orgReport.do?rptId=867853&rptForm=LM20Form	160 Elmgrove Park	Rochester	NY	14624
Advanced Personal Care Solutions, INC	https://olmsapps.dol.gov/query/orgReport.do?rptId=868508&rptForm=LM20Form	8290 W Sahara Ave	Las Vegas	NV	89117
Aegis Living Ravenna	https://olmsapps.dol.gov/query/orgReport.do?rptId=854378&rptForm=LM20Form	415 118th Avenue SE	Bellevue	WA	98005
AFP Management Corp.	https://olmsapps.dol.gov/query/orgReport.do?rptId=866392&rptForm=LM20Form	Park Place-4th Floor	Great Neck	NY	11021
Aggregate Industries PNW, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptId=875010&rptForm=LM20Form	3463 Cedarville Road	Bellingham	WA	98226
Allegiance Crane	https://olmsapps.dol.gov/query/orgReport.do?rptId=875764&rptForm=LM20Form	Eastlake Avenue	Beaumont	TX	77705
Alro Steel Corporation	https://olmsapps.dol.gov/query/orgReport.do?rptId=870440&rptForm=LM20Form	3100 E High St	Jackson	MI	49203
Amara Resort and Spa	https://olmsapps.dol.gov/query/orgReport.do?rptId=871445&rptForm=LM20Form	100 Amara Ln	Sedona	AZ	86336
American Bottling Company	https://olmsapps.dol.gov/query/orgReport.do?rptId=875445&rptForm=LM20Form	2425 Hall of Fame Lane	Frisco	TX	75043
AMIGOS MEAT	https://olmsapps.dol.gov/query/orgReport.do?rptId=871063&rptForm=LM20Form	7025 NW 37th AVENUE	MIAMI	FL	33147
AMIGOS MEAT	https://olmsapps.dol.gov/query/orgReport.do?rptId=871063&rptForm=LM20Form	7025 NW 37th AVENUE	MIAMI	FL	33147
Arcosa Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptId=855289&rptForm=LM20Form	500 N Akard Street	Dallas	TX	75201
ASANTE ROGUE REGIONAL MEDICAL CENTER	https://olmsapps.dol.gov/query/orgReport.do?rptId=867249&rptForm=LM20Form	SISKIYOU BLVD	MEDFORD	OR	97504
Ascension at Home Together with Compassus	https://olmsapps.dol.gov/query/orgReport.do?rptId=871997&rptForm=LM20Form	10 Cadillac Drive	Brentwood	TN	37027
Ascension Seton Hays	https://olmsapps.dol.gov/query/orgReport.do?rptId=875421&rptForm=LM20Form	Kyle Prkwy	Kyle	TX	78640
Ascention	https://olmsapps.dol.gov/query/orgReport.do?rptId=855971&rptForm=LM20Form	4600 Edmundson Road	St Louis	MO	63134
Ashkara	https://olmsapps.dol.gov/query/orgReport.do?rptId=853885&rptForm=LM20Form	1043 Pearl St	Boulder	CO	80302
Assa Ablay Company	https://olmsapps.dol.gov/query/orgReport.do?rptId=875913&rptForm=LM20Form	1885 Kinser Road	ceres	CA	95307
Atlantic American Fire Protection Company	https://olmsapps.dol.gov/query/orgReport.do?rptId=856038&rptForm=LM20Form	18 N State Street	Elgin	IL	60123
Ayr Wellness	https://olmsapps.dol.gov/query/orgReport.do?rptId=851227&rptForm=LM20Form	50 N Gibson Road	Henderson	NV	89014
Barnes & Noble College Books Stores	https://olmsapps.dol.gov/query/orgReport.do?rptId=870493&rptForm=LM20Form	120 Mountain View Blvd	Basking Ridge	NJ	7920
Barnes and Thomburg	https://olmsapps.dol.gov/query/orgReport.do?rptId=850922&rptForm=LM20Form	11 South Meridian Street	Indianapolis	IN	46204
Bauman Crane Company, Inc	https://olmsapps.dol.gov/query/orgReport.do?rptId=854680&rptForm=LM20Form	85 Bristol Rd	Chalfont	PA	18914
Behavioral Health & Dev Serv of Strafford Cty	https://olmsapps.dol.gov/query/orgReport.do?rptId=854620&rptForm=LM20Form	113 Crosby Road #1	Dover	NH	3820
BENCHMARK ELECTRONICS LLC	https://olmsapps.dol.gov/query/orgReport.do?rptId=875210&rptForm=LM20Form		Tempe	AZ	85288
Betz & Associates	https://olmsapps.dol.gov/query/orgReport.do?rptId=870705&rptForm=LM20Form	3748 West Chester Pike	Newtown Square	PA	19073
Blox, LLC	https://olmsapps.dol.gov/query/orgReport.do?rptId=860418&rptForm=LM20Form	1827 1st Ave, Suite #100	Birmingham	AL	35203
Bluegrass Restaurant Holdings	https://olmsapps.dol.gov/query/orgReport.do?rptId=866579&rptForm=LM20Form	3309 Collins Lane	Louisville	KY	40245
Bodega Latina	https://olmsapps.dol.gov/query/orgReport.do?rptId=850694&rptForm=LM20Form	14601b Lakewood Blvd	Paramount	CA	90723
Bowa Construction	https://olmsapps.dol.gov/query/orgReport.do?rptId=874735&rptForm=LM20Form	7050 S Stony Is Avenue	Chicago	IL	60649
Brockton Community Access TV	https://olmsapps.dol.gov/query/orgReport.do?rptId=874235&rptForm=LM20Form	1 North Main Street	Brockton	MA	2301
Centers for Family Medicine	https://olmsapps.dol.gov/query/orgReport.do?rptId=876162&rptForm=LM20Form	3460 Katella Avenue	Los Alamitos	CA	90720
Challenge Unlimited, Inc	https://olmsapps.dol.gov/query/orgReport.do?rptId=851408&rptForm=LM20Form	4 Emme L Kaus Lane	Alton	IL	62002
Clayton Homes	https://olmsapps.dol.gov/query/orgReport.do?rptId=874537&rptForm=LM20Form	5000 Clayton Rd	Maryville	TN	37804
Cooper University Health Care	https://olmsapps.dol.gov/query/orgReport.do?rptId=869909&rptForm=LM20Form	1 Cooper Plaza	Camden	NJ	8103
Corsair	https://olmsapps.dol.gov/query/orgReport.do?rptId=873771&rptForm=LM20Form	115 N McCarthy Boulevard	Milpitas	CA	95035
Corsair	https://olmsapps.dol.gov/query/orgReport.do?rptId=871163&rptForm=LM20Form	115 North McCarthy Blvd	Milpitas	CA	95035
Coyne Chemical	https://olmsapps.dol.gov/query/orgReport.do?rptId=875759&rptForm=LM20Form	56 Canal Street	Patterson	NJ	7503
Curio Wellness	https://olmsapps.dol.gov/query/orgReport.do?rptId=876106&rptForm=LM20Form		Towson	MD	21285
D B Schenker	https://olmsapps.dol.gov/query/orgReport.do?rptId=875454&rptForm=LM20Form	1305 Executive Blvd,STE 200	Chesapeake	VA	23320
Daniel Arsham Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptId=874986&rptForm=LM20Form	4-40 44th Drive	Long Island City	NY	11101
DARIGOLD, INC.	https://olmsapps.dol.gov/query/orgReport.do?rptId=874217&rptForm=LM20Form		SEATTLE	WA	98108
DCT Pizza	https://olmsapps.dol.gov/query/orgReport.do?rptId=871879&rptForm=LM20Form	3710 N FM 2148	TEARKANA	TX	75503
Desert View Wellness & Healing Solutions	https://olmsapps.dol.gov/query/orgReport.do?rptId=868440&rptForm=LM20Form	3820 W Happy Road	Glendale	AZ	85310
Diversified Healthcare	https://olmsapps.dol.gov/query/orgReport.do?rptId=872640&rptForm=LM20Form	136 Washington Avenue	Point Richmond	CA	94801

Dolsen Coke	https://olmsapps.dol.gov/query/orgReport.do?rptId=875086&rptForm=LM20Form	607 E R Street	Yakima	WA	98901
Ecovyst- Eco Services Operations	https://olmsapps.dol.gov/query/orgReport.do?rptId=867973&rptForm=LM20Form	8615 Manchester Street	Houston	TX	77012
El Milagro	https://olmsapps.dol.gov/query/orgReport.do?rptId=854380&rptForm=LM20Form	3050 W 26th Street	Chicago	IL	60623
Encore Boston Harbor	https://olmsapps.dol.gov/query/orgReport.do?rptId=874598&rptForm=LM20Form	1 Broadway	Everett	MA	2149
Fairmont	https://olmsapps.dol.gov/query/orgReport.do?rptId=866869&rptForm=LM20Form	100 Boyes Blvd	Sonoma	CA	91342
FCC Environmental Services	https://olmsapps.dol.gov/query/orgReport.do?rptId=853949&rptForm=LM20Form	460 Wildwood Forest	Spring	TX	77380
Findhelp	https://olmsapps.dol.gov/query/orgReport.do?rptId=854777&rptForm=LM20Form	3429 Executive Center Dr	Austin	TX	78731
Flowers Baking Company of Oxford	https://olmsapps.dol.gov/query/orgReport.do?rptId=875943&rptForm=LM20Form	700 Lincoln Street	Oxford	PA	19363
Galleria Market Vermont	https://olmsapps.dol.gov/query/orgReport.do?rptId=863555&rptForm=LM20Form	3250 W Olympic #100	Los Angeles	CA	90006
GE Aviation	https://olmsapps.dol.gov/query/orgReport.do?rptId=864943&rptForm=LM20Form	2400 Innovation Dr	Auburn	AL	35832
GE Gas & Power	https://olmsapps.dol.gov/query/orgReport.do?rptId=851725&rptForm=LM20Form	1 River Road	Schenectady	NY	12306
Giorgio Global Holdings, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptId=874538&rptForm=LM20Form	108 Plaza Drive	Blandon	PA	19510
GLOVIS AMERICA INC	https://olmsapps.dol.gov/query/orgReport.do?rptId=875999&rptForm=LM20Form		IRVINE	CA	92614
Gold Star Foods, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptId=852378&rptForm=LM20Form	10320 Fairgrounds Road	Huntingdon	PA	16652
Green Revolution	https://olmsapps.dol.gov/query/orgReport.do?rptId=874642&rptForm=LM20Form	Stottlemeyer Rd NE	Poulsbo	WA	98370
Green Waist	https://olmsapps.dol.gov/query/orgReport.do?rptId=868643&rptForm=LM20Form	610 Gish Rd	San Jose	CA	95112
GrowOp Farms	https://olmsapps.dol.gov/query/orgReport.do?rptId=866368&rptForm=LM20Form	2611 N Woodruff Rd Suite A	Spokane	WA	99206
Hannam Chain, USA	https://olmsapps.dol.gov/query/orgReport.do?rptId=870788&rptForm=LM20Form	2740 Olympic Blvd	Los Angeles	CA	90006
Hearn Industrial Solutions	https://olmsapps.dol.gov/query/orgReport.do?rptId=868243&rptForm=LM20Form	Huron Street	Taylor	MI	48180
Hello Fresh (DBA Grocery Delivery E-Services USA, Inc.)	https://olmsapps.dol.gov/query/orgReport.do?rptId=866264&rptForm=LM20Form	28 Liberty St	New York	NY	10005
Hershey Chocolate Of Virginia	https://olmsapps.dol.gov/query/orgReport.do?rptId=876119&rptForm=LM20Form		Stuarts Draft	VA	24477
Hyatt Centric French Quarter	https://olmsapps.dol.gov/query/orgReport.do?rptId=868451&rptForm=LM20Form	800 Iberville Street	New Orleans	LA	70112
Hygrade Components	https://olmsapps.dol.gov/query/orgReport.do?rptId=875271&rptForm=LM20Form	Highland Ave	Bethlehem	PA	18020
ImageFIRST	https://olmsapps.dol.gov/query/orgReport.do?rptId=873155&rptForm=LM20Form	900 E. Eighth Avenue	King of Prussia	PA	19406
Insight Pest Solutions WA, LLC	https://olmsapps.dol.gov/query/orgReport.do?rptId=871881&rptForm=LM20Form	1900 North 6000 West	Rexburg	ID	83440
Inspira Health Network In	https://olmsapps.dol.gov/query/orgReport.do?rptId=872051&rptForm=LM20Form	1430 W Sherman Avenue	Vineland	NJ	8360
Jack B. Parson Ready Mix Concrete	https://olmsapps.dol.gov/query/orgReport.do?rptId=870509&rptForm=LM20Form	89 West 13490 South	Draper	UT	84020
Jackson Lewis PC/Massachusetts General B. righam In	https://olmsapps.dol.gov/query/orgReport.do?rptId=866335&rptForm=LM20Form	2800 Quarry Lake Drive Suite 200	Baltimore,	MD	21209
Johansen Construction Company, LLC	https://olmsapps.dol.gov/query/orgReport.do?rptId=866087&rptForm=LM20Form	2003 136th Ave. E.	Sumner	WA	98390
Johns Hopkins Hospital	https://olmsapps.dol.gov/query/orgReport.do?rptId=859275&rptForm=LM20Form	600 North Wolfe Stree	Baltimore	MD	21287
Julius Silvert	https://olmsapps.dol.gov/query/orgReport.do?rptId=874687&rptForm=LM20Form	231 East Luzerne Street	Philadelphia	PA	19124
KAG MERCHANT GAS GROUP LLC	https://olmsapps.dol.gov/query/orgReport.do?rptId=868267&rptForm=LM20Form	3006 N Raceway Road	Indianapolis	IN	46234
Kia of Duluth	https://olmsapps.dol.gov/query/orgReport.do?rptId=865239&rptForm=LM20Form	W. Michigan St.	Duluth	MN	55806
Labcorp	https://olmsapps.dol.gov/query/orgReport.do?rptId=850502&rptForm=LM20Form	1957 Lakeside Pkwy Suite #542,	Tucker	GA	30084
Lake Orion Nursing and Rehabilitation Center	https://olmsapps.dol.gov/query/orgReport.do?rptId=875622&rptForm=LM20Form	585 East Flint Street	Lake Orion	MI	48362
Lammers Heating and Air Conditioning	https://olmsapps.dol.gov/query/orgReport.do?rptId=870808&rptForm=LM20Form		Jackson	MI	49202
Legoland SD	https://olmsapps.dol.gov/query/orgReport.do?rptId=875207&rptForm=LM20Form	One Legoland Drive	Carlsbad	CA	92008
Lettuce Entertain You Restaurants	https://olmsapps.dol.gov/query/orgReport.do?rptId=874483&rptForm=LM20Form	5419 N. Sheridan Road	Chicago	IL	60640
LRS Recycles	https://olmsapps.dol.gov/query/orgReport.do?rptId=875322&rptForm=LM20Form	5500 Pearl Street	Rosemont	IL	60018
Marin Community Clinics	https://olmsapps.dol.gov/query/orgReport.do?rptId=859052&rptForm=LM20Form		Novato	CA	94949
MERIT ALUMINUM FOUNDRY INC	https://olmsapps.dol.gov/query/orgReport.do?rptId=853196&rptForm=LM20Form	Primrose Road	Adelanto	CA	92301
Micross Components, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptId=873256&rptForm=LM20Form	225 Broadhollow Road, Suite 305	Melville	NY	11747
NEWPORT MEAT COMPANY	https://olmsapps.dol.gov/query/orgReport.do?rptId=866761&rptForm=LM20Form	16691 Hale Avenue	IRVINE	CA	92606
Night Owls Printshop	https://olmsapps.dol.gov/query/orgReport.do?rptId=875496&rptForm=LM20Form	4303 Southerland Road	Houston	TX	77092
Northgate San Diego	https://olmsapps.dol.gov/query/orgReport.do?rptId=866868&rptForm=LM20Form	2909 Coronado Ave	San Diego	CA	92154

NRT Bus	https://olmsapps.dol.gov/query/orgReport.do?rptid=874175&rptForm=LM20Form	2 Fox Rd	Hudson	MA	1749
Nutra Blend, LLC	https://olmsapps.dol.gov/query/orgReport.do?rptid=876017&rptForm=LM20Form	4001 Lexington Ave North	Arden Hills	MN	55126
One World Ventures, LLC	https://olmsapps.dol.gov/query/orgReport.do?rptid=875070&rptForm=LM20Form	57 Shank Rd	Brawley	CA	92227
PCC - Permasage	https://olmsapps.dol.gov/query/orgReport.do?rptid=874439&rptForm=LM20Form	14800 S Fiqueroa	Gardena	CA	90248
PERDUE AGRIBUSINESS EDIBLE OIL REFINERY	https://olmsapps.dol.gov/query/orgReport.do?rptid=874119&rptForm=LM20Form	6909 Zion Church Road	Salisbury	MD	21804
PetVet Care Centers Inc	https://olmsapps.dol.gov/query/orgReport.do?rptid=855257&rptForm=LM20Form	One Gorham Island Road, Suite 30	Westport	CT	6880
Playtech	https://olmsapps.dol.gov/query/orgReport.do?rptid=870607&rptForm=LM20Form	Northwestern HWY	Southfield	MI	48075
Polsinelli PC	https://olmsapps.dol.gov/query/orgReport.do?rptid=868613&rptForm=LM20Form	100 S. Fourth Street, Suite 1000	St. Louis	MO	63102
Premiere Staffing	https://olmsapps.dol.gov/query/orgReport.do?rptid=875345&rptForm=LM20Form	250 Parkway Drive, Suite120	Lincolnshire	IL	60069
Priority Life Care	https://olmsapps.dol.gov/query/orgReport.do?rptid=850797&rptForm=LM20Form	Chestnut Hills Pkwy	Fort Wayne	IN	46814
Resorts World Las Vegas	https://olmsapps.dol.gov/query/orgReport.do?rptid=866656&rptForm=LM20Form	3000 Las Vegas Blvd South	Las Vegas	NV	89109
Restore Integrated Wellness	https://olmsapps.dol.gov/query/orgReport.do?rptid=868110&rptForm=LM20Form	8003 Old York Rd	Elkins Park	PA	19027
RWJ Barnabas Health	https://olmsapps.dol.gov/query/orgReport.do?rptid=858898&rptForm=LM20Form	379 Campus Drive	Somerset	NJ	8873
RXO Inc	https://olmsapps.dol.gov/query/orgReport.do?rptid=862880&rptForm=LM20Form	11215 North Community House Rd	Charlotte	NC	28277
SAGE Services	https://olmsapps.dol.gov/query/orgReport.do?rptid=854580&rptForm=LM20Form	1305 Del Norte Road	Camarillo	CA	93010
Schoolhouse Electric	https://olmsapps.dol.gov/query/orgReport.do?rptid=866978&rptForm=LM20Form	2181 NW nicolai St	Portland	OR	97210
Schuld Bushnell	https://olmsapps.dol.gov/query/orgReport.do?rptid=852237&rptForm=LM20Form	380 E Main Street	Bushnell	IL	61422
Schuster Concrete Construction	https://olmsapps.dol.gov/query/orgReport.do?rptid=850616&rptForm=LM20Form	3717 Cromdall Lane	Owings Mills	MD	21117
SCR Medical Transportation	https://olmsapps.dol.gov/query/orgReport.do?rptid=876427&rptForm=LM20Form	8835 S. Greenwood Ave.	Chicago	IL	60619
Seasons 4 Inc	https://olmsapps.dol.gov/query/orgReport.do?rptid=854641&rptForm=LM20Form	4500 Industrial Access Rd	Douglasville	GA	30134
Shasta Beverage	https://olmsapps.dol.gov/query/orgReport.do?rptid=856626&rptForm=LM20Form	14405 E Artesia Blvd	La Mirada	CA	90638
St. Christopher Hospital/Tower Health	https://olmsapps.dol.gov/query/orgReport.do?rptid=875392&rptForm=LM20Form	PO Box 16052	Reading	PA	19612 - 6052
St. Peters Health	https://olmsapps.dol.gov/query/orgReport.do?rptid=874182&rptForm=LM20Form	3330 Ptarmigan Lane	Helena	MT	59602
Starr Tent	https://olmsapps.dol.gov/query/orgReport.do?rptid=873654&rptForm=LM20Form	75 Beechwood Avenue	New Rochelle	NY	10801
Summit Health	https://olmsapps.dol.gov/query/orgReport.do?rptid=875402&rptForm=LM20Form	150 Floral Ave	New Providence	NJ	7974
Swinks Welding, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=866827&rptForm=LM20Form	2054 Tapo Street	Simi Valley	CA	93063
Swissport	https://olmsapps.dol.gov/query/orgReport.do?rptid=874858&rptForm=LM20Form	1850 West Gowen Road	Boise	ID	83716
SYGMA NETWORK	https://olmsapps.dol.gov/query/orgReport.do?rptid=871263&rptForm=LM20Form	2689 OK-69A	PRYOR	OK	74361
Sysco Corporation	https://olmsapps.dol.gov/query/orgReport.do?rptid=875400&rptForm=LM20Form	1390 Enclave Parkway	Houston	TX	77077
SYSCO KNOXVILLE	https://olmsapps.dol.gov/query/orgReport.do?rptid=867718&rptForm=LM20Form	900 Tennesse Avenue	KNOXVILLE	TN	37921 - 2630
Thompson Chicago	https://olmsapps.dol.gov/query/orgReport.do?rptid=868576&rptForm=LM20Form	21 East Bellevue Place	Chicago	IL	60611
Titan Steel Fabricators, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=865098&rptForm=LM20Form		El Cajon	CA	92021
Tower Health	https://olmsapps.dol.gov/query/orgReport.do?rptid=875550&rptForm=LM20Form		West Reading	PA	19611
Tree House Humane Society	https://olmsapps.dol.gov/query/orgReport.do?rptid=874210&rptForm=LM20Form	7225 N Western Ave	Chicago	IL	60645
Tri Family LLC DBA Hand and Stone Massage	https://olmsapps.dol.gov/query/orgReport.do?rptid=868531&rptForm=LM20Form	4122 NW 16th Blvd	Gainesville	FL	32605
United Natural Foods, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=869932&rptForm=LM20Form	Lake Rd	Dayville	CT	6241
United Natural Foods, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=869932&rptForm=LM20Form	Lake Rd	Dayville	CT	6241
Universal Intermodal Services, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=868304&rptForm=LM20Form	12755 E Nine Mile Rd	Warren	MI	48089
University Medical Center Management Corporation	https://olmsapps.dol.gov/query/orgReport.do?rptid=875790&rptForm=LM20Form	2000 Canal Street	New Orleans	LA	70112
University Medical Center Management Corporation	https://olmsapps.dol.gov/query/orgReport.do?rptid=875790&rptForm=LM20Form	2000 Canal Street	New Orleans	LA	70112
UPS Cartage Services, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=875660&rptForm=LM20Form	10725 Harrison Road	Romulus	MI	48174
UPS Worldport	https://olmsapps.dol.gov/query/orgReport.do?rptid=861737&rptForm=LM20Form	911 Grade Lane	Louisville	KY	40213
US Facilities	https://olmsapps.dol.gov/query/orgReport.do?rptid=875763&rptForm=LM20Form	30 N 41st Street	Philadelphia	PA	19104
Vaderstad	https://olmsapps.dol.gov/query/orgReport.do?rptid=871590&rptForm=LM20Form	State Rte 13	Wahpeton	ND	58075
Ventura Coastal	https://olmsapps.dol.gov/query/orgReport.do?rptid=857713&rptForm=LM20Form	12310 Avenue unit 368	Visalia	CA	93291

Verano	https://olmsapps.dol.gov/query/orgReport.do?rptid=875873&rptForm=LM20Form	415 N Dearborn Street, Fl 4	Chicago	IL	60654
Volkswagen of Highland	https://olmsapps.dol.gov/query/orgReport.do?rptid=870677&rptForm=LM20Form	9601 Indianapolis Blvd	Highland	IN	46322
Vorys, Sater, Seymour and Pease LLP	https://olmsapps.dol.gov/query/orgReport.do?rptid=852809&rptForm=LM20Form	52 East Gay Street	Columbus	OH	43216
Washington Center for the Performing Arts	https://olmsapps.dol.gov/query/orgReport.do?rptid=868392&rptForm=LM20Form	512 Washington St. S.E.	Olympia	WA	98501
Webasto Convertibles USA Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=868211&rptForm=LM20Form		Plymouth	MI	48170
Webasto Group	https://olmsapps.dol.gov/query/orgReport.do?rptid=874677&rptForm=LM20Form	2200 Innovation Drive	Lexington	KY	40511
Werner Enterprises	https://olmsapps.dol.gov/query/orgReport.do?rptid=871193&rptForm=LM20Form	14507 Frontier Road	Omaha	NE	68138
Westlake Management Services, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=875916&rptForm=LM20Form	2801 Post Oak Blvd.	Houston	TX	77056
Willowbrook Manor	https://olmsapps.dol.gov/query/orgReport.do?rptid=874976&rptForm=LM20Form	Beecher Rd	Flint	MI	48532
WIN Waste Innovations Holdings Inc	https://olmsapps.dol.gov/query/orgReport.do?rptid=851207&rptForm=LM20Form	100 Arboretum Drive, Suite 310	Portsmouth	NH	3801
Woodward, Inc.	https://olmsapps.dol.gov/query/orgReport.do?rptid=874948&rptForm=LM20Form	3100 Cumberland Blvd.	Atlanta	GA	30339
Xpirit Restaurant Group	https://olmsapps.dol.gov/query/orgReport.do?rptid=854995&rptForm=LM20Form	555 Kauahi Street	Wailea	HI	96753
YAPP-USA AUTOMOTIVE SYSTEMS, INC.	https://olmsapps.dol.gov/query/orgReport.do?rptid=854620&rptForm=LM20Form	300 ABC Blvd.	Gallatin	TN	37066

2023 LM-21 Data

LaborLab

Persuader	Number of 2023 LM-20 Mentions
Aaron Butler (sole proprietor)	1
Abram Moore (sole proprietor)	3
AFRS	3
ALG HR Solutions (including Jason Blain)	4
Alpha Omega A Plus	1
Arringtons All In One Services	1
Bridge Labor Solutions LLC	11
CBC Consulting	2
Chris Catam (sole proprietor)	2
Culture Built LLC	5
Cummings Group, LLC	7
Danny Bryan (sole proprietor)	2
DBA Alliance LRC	1
Edward Echanique (sole proprietor)	7
Elizabeth Gill (sole proprietor)	1
Emidgio Arias (sole proprietor)	14
Employment Practice Counsel LLC	2
EPC	4
Eric Vanetti (sole proprietor)	6
Flores Labor Relations	5
Gabrielle Mattes	4
Galilea Corp, LLC	1
Greer Consulting, Inc.	16
Hidden Pearl Consulting (dba Progressive Labor Solutions)	1
Hyperion HR LLC	4
IDI Management Consulting	4
Ignacio Fresan (sole proprietor)	1
J&H Labor Consultants	4
James Misercola (sole proprietor)	1
Jessica Salas (sole proprietor)	1
Johan Pena (sole proprietor)	4

Item	Count	Percent
Not Filed	82	60.3%
Complete	29	53.7%

Jonathan Sutton (sole proprietor)	1
Jose Agraz (sole proprietor)	2
Josue Figueroa (sole proprietor)	1
Juan Carlos Cervantes (sole proprietor)	1
Justin Shoemaker (sole proprietor)	2
KJM Consultants	1
LABOR RELATIONS LMP INC	1
Laura Garcia (sole proprietor)	1
Law Offices of Stanley E. Niew, P.C.	1
LEWIS LABOR RELATIONS	3
Libra Management Consulting Inc	11
Lighto Labor Inc	3
Lisa Strobridge (sole proprietor)	2
LKLS Consulting	15
LRH Consulting	1
Luisa Perez	3
M Rosado MGMT. Consultants, LLC	3
Marcia Carter (sole proprietor)	3
Michael Cheney (sole proprietor)	2
Millennium Labo Consulting LLC	1
Miriam Morino (sole proprietor)	1
MSC Labor Relations	1
National Labor Relations Advocates	8
Nolsen & Assoc	1
Oscar Wilmington (sole proprietor)	3
P.A.S. Labor	1
Peacock HR Services	2
Permanent Solutions Labor Consultants	3
Phil McMann (sole proprietor)	1
Pinnacle Labor Relations LLC (including Simon Jara)	7
Proficient Labor Solutions, LLC	3
Progressive Labor Solutions (dba Hidden Pearl)	2
Quality Labor Solutions Inc.	6

Raphael Sebastian (sole proprietor)	1
Reliant Labor Consultants LLC	1
Robin Bueshing (sole proprietor)	1
Santana International Inc	6
Solutions Labor Relations Consultants	5
SSS Consulting	1
Tandem, LLC (including Lisa Strobridge)	3
The Golden Rule	3
The Smith Group	1
The TAG Group	6
The Tally Consultancy, LLC	2
Thorbin Consulting	1
Todd Turner (sole proprietor)	1
Towanna Tindall (sole proprietor)	1
Trinh Van Ngo (sole proprietor)	1
VIF Estates Inc (including Viviana Flores)	3
Webster Group Consulting	1
Zoraya Atayde (sole proprietor)	1