ONE-SIDED TRANSPARENCY

The Growing Reporting Gap Between Required
Annual Union Versus Employer and Persuader Filings
and OLMS Compliance Efforts Continues to Widen:
An Examination of Recent Data and Reports

July 2025 Year-to-Date Report of 2024 LM-10 and LM-21 Non-Filers Report

LaborLab

July 2025 Year-to-Date Report of 2024 LM-10 and LM-21 Non-Filers

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Introduction

Since 2022, LaborLab, a non-profit LMRDA watchdog, has monitored and reported on employers and persuader consultants who have failed to file their required annual reports which, by law, are due ninety (90) days after the close of their fiscal year. In this report, we summarize employer (Form LM–10) and persuader consultant (Form LM–21) reports non-filing for a third year, 2024, as of June 30, 2025. It's worth noting that unions covered by the LMRDA are also required to file annual reports, also due ninety days after their fiscal year ends.

This year, we've both lengthened and broadened the perspective of our report. First, we include data from three government-conducted studies which reviewed on-time filing of required annual reports: (a) the just released (2025) Government Accountability Office (GAO) summarizing delinquent union filings for fiscal years 2019 through 2023 (Government Accountability Office, GAO-25-107297, "Labor Organization Oversight: DOL Should Enhance Enforcement and Assistance Processes," published June 17, 2025); (b) the 2024 Department of Labor's Inspector General Report; and (c) the 1984 Subcommittee Report of the US House of Representatives Education and Labor Committee. While the GAO report provides data regarding on-time filing by labor organizations, the latter two reports provide "bookends" on non-filing by employers

and persuaders in 1984 and 2024. Comparing these three data sets with our 2024 analysis allows for the first-ever triangulation of the full extent of the reporting gap between employers and persuader consultants on one hand, and unions on the other.

This report is organized into several distinct but interrelated sections.

(1) Union Delinquency Rates and OLMS Progress

First, we summarize the recent data (FY 2019–2023)on union LM-2, -3, and -4 delinquency rates reported by the GAO and the successful efforts by OLMS to significantly reduce these rates. For Fiscal Year 2023, the union on-time filing rate was 83% and is likely to continue improving.

(2) Historical and Recent Findings on Employer/Consultant Delinquency

The second section briefly summarizes the salient findings of both the 1984 U.S. House of Representatives Education and Labor Committee report on delinquent LM–10 and LM–21 filings, as well as the results of the 2024 DOL Inspector General report on the same subject. This section also includes their findings regarding the lack of enforcement devoted to improving filing rates for these key reports.

(3) LaborLab's 2024 Monitoring Methodology

In our third section, we briefly describe our own methodology for monitoring delinquent filing rates for both Forms LM-10 and LM-21 for filing year 2024 (most of these are filed in 2025) as of June 30, 2025. Note that since most employers and persuader consultants mirror the calendar year for their fiscal year (unlike unions, where approximately two-thirds use a calendar-based fiscal year and about one-third use a July 1 to June 30 fiscal year), these reports would have been due by March 31, 2025. To date, less than half of these required reports have been filed at all; and a significant number of those which <u>have</u> been filed are both delinquent and deficient

(4) Conclusions and Recommendations

The final section of this report offers our conclusions and brief recommendations for follow-up action by OLMS, DOL, and others.

<u>Union annual report filing delinquency status—findings of the 2025 GAO study</u>

In a report released June 17, 2025, the GAO presented a data series of union annual report (Forms LM-2, -3 and -4) filings over the most recently available past five years.

According to the GAO report:

OLMS is also working to reduce the number of labor organizations that miss the deadline for required reports, including financial disclosures. Financial disclosure reports are due 90 days after the end of the labor organization's fiscal year, and according to officials, *OLMS follows up with the labor organization if the report is not filed within 15 days of the due date. If a labor organization files its financial disclosure report 15 or more days late for 3 consecutive years, OLMS deems it chronically delinquent.* OLMS officials stated that it could be a challenge to get labor organizations to prioritize timely filing given a lack of monetary penalties in the LMRDA for late filing (emphasis added)

The GAO report also noted that OLMS opens delinquency case investigations when a labor organization's financial disclosure report is 15 or more days late. Citing OLMS officials, an LM-2, -3, or -4 report that is fifteen or more days late will trigger a field office investigation to gain compliance. This includes written inquiries, follow-up phone calls, and offers of compliance assistance.

Secondly, OLMS identifies "chronically delinquent" union filers by maintaining a watch list

of organizations that were late in filing its financial disclosure report by 15 or more days the previous 2 years and sets a goal for the number of these that file on time in the current year. *The number of chronically delinquent organizations* fluctuated between fiscal years 2019 through 2024, from a high of 1,576 in fiscal year 2021 to a low of 1,128 in fiscal year 2023 (emphasis added).

Finally, OLMS relies on a "Voluntary Compliance Partnership Program" (established in 2010) with parent labor organizations (which includes approximately 40 national and international unions) through which

Each national or international labor organization participating in the Voluntary Compliance Partnership program regularly receives a list of affiliates that filed late at least once in the last 2 years and the number of days late. Citing OLMS officials, GAO notes the program includes partnerships with some of the largest labor organizations, and they cover around 80 percent of labor organization affiliates. The reported overall on-time filing rate for labor organizations under the Voluntary Compliance Partnership was higher than those outside the partnership in fiscal year 2023 (85 percent for Partnership participants and 70 percent for others).

We note here we are unaware of any similar programs for tracking LM-10 and LM-21 reports for persuader activity and that there is no corresponding voluntary compliance program for some 100 or so persuader consultants who regularly file LM-20 reports, even though LaborLab has repeatedly recommended that OLMS establish one, particularly given the successful track record of the VCA program with union on-time filing.

The table below, copied directly from Table 3 of the GAO report, shows considerable improvement in on-time filing and reduction in several different categories of delinquent filers, including all delinquent filers, those who are 6-12 months late and those who are more than 12 months late.

From Table 3, GAO Report	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	% Change
Total labor organization						
financial disclosures						
received	21,341	21,318	21,342	20,900	20,738	-2.8%
Late filing, 6 - 12 months						
after filing deadline	377	252	270	187	168	-55.4%
Late filing, more than 12						
months after filing						
deadline	296	278	274	329	24	-91.9%
Total that did not file a						
report by the filing						
deadline	5,951	4,904	4,950	3,482	3,518	-40.9%
Percent delinquent filings	27.9%	23.0%	23.2%	16.7%	17.0%	-39.2%
Percent on-time filers	72.1%	77.0%	76.8%	83.3%	83.0%	

Over this five-year period, the overall on-time filing rate has increased from 72.1% to 83%, with a nearly forty percent drop in total delinquent filings. Particularly noteworthy is the drop in filings that are a year or more late (a 92% decrease) and those that are six to twelve months late (a 55% drop). Clearly, OLMS's efforts to improve on-time filing by union filers, at least in the past five years, are working and working well.

Sadly, we are unaware of any equivalent systematic approaches by OLMS to improve on-time filing by employers (Form LM-10) and persuader consultants (Form LM-21). Because the number of filers is very significantly less than union annual report filers, the number of resources required would likely be considerably less to make significant improvements in filing behavior by employers and the persuaders they engage.

Employer and persuader consultant delinquent filings from the 1984 U.S. House of Representatives Education and Labor Subcommittee

A subcommittee of the US House of Representatives Education and Labor Committee in 1984 sampled LM-10, -20 and -21s filed since 1960 and noted

a failure to cross-check employer and consultant reports received and its inadequate efforts to require filers to cure serious deficiencies in their reports. According to the Subcommittee report, the filing of an LM-20 report by a consultant should always result in the filing of a corresponding employer LM-10 report. (The reverse is not always true since an employer could be required to file an LM- 10 report in some instances which did not involve consultant activity) (emphasis added).

The committee staff drew a random sample of 84 LM-10 forms from all filings since 1960. They discovered that thirty-one percent (31%) of the consultants identified in these LM-10s failed to file the **required LM-20s**. The staff did not make any findings regarding employers who engaged a persuader consultant but, in turn, did not file an LM-10.

More importantly, for our purposes, from the same sample, the House Subcommittee discovered that only **sixty-two** percent (62%) of consultants who filed an LM-20 also bothered to file the Form LM-21 for that year (a non-filing rate of 38%!). Note that this doesn't equate to a delinquency rate, but a **non-filing** rate; the two are not

synonymous! To be counted as delinquent requires the actual filing of a required report. But not filing it at all means it can't be counted as delinquent!

Perhaps even more importantly, the House Subcommittee noted that this non-filing behavior could have been "easily discoverable" **had the agency cross-matched "the forms in its possession**."

The House Subcommittee pointedly noted that the agency director himself testified to the subcommittee that his agency routinely cross-matched LM-20s with LM-21s; however, in response to a direct question from the House Subcommittee, the agency head admitted on the record that this practice had begun only two days before the hearing.

Besides the obvious delinquency problem, the subcommittee also noted significant deficiencies in the LM-21 reports received by the agency:

Further, in our sample we noted that a substantial number of reports LMSE (OLMS's predecessor) had acknowledged by letter as satisfactory contained significant omissions of required information. These omissions included names, dollars amount, and legally required signatures of principals. In such instances there was no indication that LMSE had attempted to secure proper data. Again, LMSE enforcement policy here sharply contrasts with LMSE review of union reports, which are subjected to computerized review, with deficiencies and contradictory entries flagged and assigned for audits and investigations. This unequal enforcement is all the more difficult to justify in light of the fact that union filings vastly out number employer and consultant filings-in FY 1983, for instance, LMSA received over 71,000 union and union officer reports, and just 198 employer and consultant reports (emphasis added).

The above finding is highly significant in light of LaborLab's analysis (below) of 2024 LM-10 and -21 filings. First of all, the House Subcommittee report painstakingly documents a "deficiency gap" between union reports on the one hand, which are both subjected to more intensive analysis and follow-up audits or investigations, and on the other hand, glaring deficiencies in the LM-10 and LM-21s, with little or no analysis and no follow-up. In addition, the House Subcommittee report points out the obvious fact that there are orders of magnitudes of difference between the number of union filings, on the one hand, and the number of persuader and employer filings.

After reporting a marked decrease in LM-10, -20, and -21 filings for the FY 1979 – FY 1983 period (from 398 total filings in FY 1979 to 198 total filings in FY 1983), a dramatic decrease in cases opened against employers and persuader consultants (from 350 in FY 1979 to 28 in FY 1983), and a drop in meritorious complaint cases (from 42 in FY 1980 to 19 in FY 1983), the subcommittee concluded:

The Department of Labor has abdicated its responsibility to enforce the employer and consultant reporting law. The Department has abandoned an even-handed approach to enforcing the law against unions, employers, and labor relations consultants. As a result, non-compliance by employers and consultants is widespread, and the Department has frustrated Congress' intent that labor-management relations be conducted in the open.

There is little that can be added to the conclusions reached above by the 1984 House Subcommittee report, except to say the same problems continue to characterize annual reporting and disclosure by persuaders and the employers who hire them, while union filings continue to receive at least the same and likely even greater scrutiny and follow-up by the agency.

Employer and persuader consultant delinquent filings redux: findings of the Department of Labor Inspector General, 2024

On May 3, 2024, the Department of Labor's Office of Inspector General released its report <u>09-24-002-16-001</u>, titled "OLMS Can Do More To Protect Workers' Rights To Unionize Through Enforcing Persuader Activity Disclosure." The Inspector General's report identified several distinct but related reporting enforcement issues:

- (1) Many employers and persuader consultants who were required to file annual reports (Form LM-10 for employers, Form LM-21 for persuader consultants) during the three-year period studied did not file the reports at all (non-filing).
- (2) In many cases, an employer filed the required LM-10 report, but the persuader consultant did not file the required corresponding LM-21 report, or vice versa.
- (3) For those employers and persuader consultants who did file the required reports, a significant number of them were late, far more so than the union annual report delinquency data reviewed above.

The DOL Inspector General has succinctly and convincingly identified several distinct but interrelated problems regarding LM-10 and LM-21 report filing: non-filing by

those obligated to submit reports (LM-10 or LM-21), delinquent filing by those who <u>did submit</u> reports, and instances where an employer filed an LM-10 without a corresponding LM-21, or vice versa.

A deeper dive into these three problems is warranted and now follows:

1. Non-filing of LM-10 and LM-21 reports by employers and persuader consultants: With regards to non-filing of Forms LM-10 and -21, the Inspector General noted that

While OLMS has increased the number of persuader reports filed within the last year, the numbers are still low. In the 3-year period we reviewed, January 1, 2021, through August 22, 2023, we found only 428 employers and 211 consultants reported persuader activities to OLMS. According to the Bureau of Labor Statistics, as of June 2023, there were approximately 12 million employers in the United States. While the total number of employers engaging in persuader activities each year is unknown, the low number of reporting businesses raises concerns that persuader activities are significantly underreported (emphasis added).

Note that the Inspector General **did not attempt to estimate the number of non-filers**, which LaborLab does in the next section of this report. LaborLab carefully crossmatched all Forms LM–20 for 2024 with Forms LM–10 and LM–21, because the filing of just one LM–20 report "triggers" the filing of a Form LM–21 by the same persuader and the filing for a Form LM–10 by the employer who hires that persuader; note that this same assertion was made in the 1984 Congressional Subcommittee report above.In effect, the LM–20s filed becomes a "denominator", denoting the number of LM–21s "owed" by persuaders and LM–10s by the employers who engage them. Unfortunately, neither the DOL IG nor the 1984 Congressional subcommittee made any attempt to estimate the number of LM–21s and LM–10s "owed" so they were unable to estimate the non-filing rate. LaborLab does so below. 2. *LM–10 filed but no LM–21, or vice versa*: Here is what the DOL Inspector General found in this regard:

We found examples where either the employer or the consultant had filed a report, but the corresponding report was not filed, contributing to the underreporting. Our analysis identified the following missing reports:

• 605 employers were named in consultant reports but did not file a corresponding employer report with that exact name;

- 1,478 consultants were named in employer reports but did not file a corresponding consultant report with that exact name; and
- 142 consultants were named in consultant reports but did not file a corresponding consultant financial report with that exact name.

One of the problems highlighted here is the difficulty in cross-matching LM-10 with LM-21 reports. This difficulty arises because there is no required unique identifier that would facilitate a definitive match between the two. One of OLMS's responses to this was to require, beginning in 2025, that employers and persuader consultants provide the unique Employer Identification Number (EIN) for employers, persuader consultants, and subcontractors. However, as we note in the next section, our review of post-January 2025 filings indicates that very few employers or persuader consultants are bothering to provide the required EIN.

3. Delinquent LM-10 and LM-21 filings during the three-year period: Regarding delinquent Form LM-10s, the Inspector General reported:

428 employers submitted 537 employer reports from January 1, 2021, through August 22, 2023. Of those, 265 (or 49 percent) were submitted more than 90 days after the employer's fiscal year end." This means that barely half of the submitted LM-10s were filed on time, a stark contrast to the 83% on-time filing rate for unions during the same period. Figure 1 of this report shows that approximately 14% of the LM-10s filed in this period were 6 to 12 months late, and over 18% were more than a year late. The corresponding data for union delinquencies, presented above for FY 2023, shows only 0.8% of total filings were 6-12 months late and 0.1% were 12 or more months late.

Regarding delinquent filings of Form LM-21s, the Inspector General found that forty-seven percent (47%, or 118) of those filed were delinquent. Ten percent of the LM-21s filed during the three-year period were 6 to 12 months late, and nearly 20% were one year or more late. In absolute terms, there are more delinquent LM-10 and LM-21 filings in the 6-12 month and greater than 12-month periods than the total number of union filings in those same categories for FY 2023.

LaborLab analysis of 2024 LM-10 and LM-21 filings

Just as we have done in 2022 and 2023, we "skimmed" a database of all LM-20s filed for reportable persuader activity in calendar year 2024 and identified the primary persuader and subcontractors by employer in order to determine both which 2024 employers "owed" Form LM-10s by dint of the LM-20 filed and which 2024 persuader consultant (primary and subcontractor) who owed an LM-21 by virtue of the 2024 LM-20 being filed.

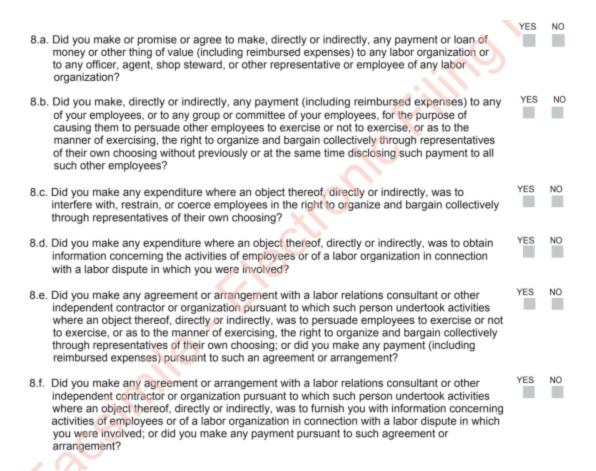
For both the LM-10 and the LM-21 annual reports, the "triggering event" is the filing of an LM-20 which simultaneously requires the employer to file a Form LM-10 and the persuader consultant or subcontractor to file a Form LM-21. This is analogous to the filing of an LM-2, -3 or -4 union annual financial report being "triggered" by the filing of a Form LM-1:

Every labor organization subject to the Labor-Management Reporting and Disclosure Act, as amended (LMRDA), the Civil Service Reform Act (CSRA) standards of conduct regulations, or the Foreign Service Act (FSA) must file an initial Form LM-1 Information Report, along with its constitution and bylaws, and an annual financial report, Forms LM-2, LM-3, or LM-4 Labor Organization Annual

https://www.dol.gov/agencies/olms/reports/forms/lm-1-lm-2-lm-3-lm-4.

Unless and until the union files a terminal LM report, this annual filing obligation is triggered.

In the case of the LM-10 and the LM-21, this filing obligation is triggered by the filing of a Form LM-20, although in the case of the LM-10, there are additional triggers, such as payments to the employers own employees for persuader activity and more commonly, certain reportable payments to unions and union officials. The <u>Form LM-10</u>, shown below, has six different types of reporting obligations, of which the last two 8(e) and 8(f), are triggered directly by the filing of a Form LM-20.



According to the OLMS Fact Sheet on Persuader Reporting,

Any person required to file a Form LM-20 also must file a Form LM-21 Receipts and Disbursements Report for any year in which payments were made or received as a result of arrangements of the kind requiring the Form LM-20 report (emphasis added)

Section 203(a) of the LMRDA requires employers to file a report, Form LM-10, with OLMS if they make certain expenditures or engage in certain activities, including entering into agreements or arrangements with any third party consultant, to persuade employees concerning their collective bargaining or organizing rights or to obtain certain information, as detailed above... A Form LM-10 report is required within 90 days after the end of the employer's fiscal year. Employers are required to file only one Form LM10 each fiscal year that covers all instances of reportable activity even if, for example, activity occurs at

multiple locations, or the employer enters into more than one consultant agreement

Because many persuader consultants file multiple LM-20s for the same employer (typically when they retain new subcontractors or when the terms of the arrangement or agreement change, such as the expiration date), it was necessary to filter out duplicate LM-20 filings for the same employer. This ensured that each unique employer was listed only once in the spreadsheet we constructed.

We also had to determine whether the LM-20 filer was the primary contractor or a subcontractor. We did this by using Part 11(d) of the LM-20 form, where subcontractors are to be listed, as shown below. Note that any subcontractors or employees used by the primary persuader contractor (and their EINs, effective January 1, 2025) must be listed here. This information was used to designate subcontractors who additionally owed LM-21s.

11.c. Extent performed:
Additional name and address through whom performed, if any:
Name
Title
Type of Person ☐ Employee of Consultant ☐ Sub-consultant
Organization Name
Employer Identification Number
P.O. Box, Bldg., Room No., if any
Street
City
StateZIP Code + 4

12.b. Identify subject labor organizations:

The cross-matching of employer LM-10 annual reports and persuader LM-21 annual reports from this unique list of LM-20s is a painstaking process. This is due to the

frequent use of employer trade names in the LM-20 and registered business names in Form LM-10, or vice versa. There are often spelling errors or incomplete business names used in Form LM-20. This requires us to use additional points of identification, including the agreement date (the date the persuader agreement was reached) as well as the employer's address provided on the LM-10, -20, and -21 forms. Additionally, since the LM-10 itemizes payments by date, we check that the payment dates occur within the timeframe outlined in the LM-20. In some cases, we encounter agreement dates in 2024, but the LM-10 shows the last payment occurred in the previous year; in such instances, we do not count this as a crossmatch.

The cross-matching process was supposed to be simplified somewhat by OLMS requiring all 2025 filers (for 2024 LM-10 and LM-21 annual reports) to provide Employer Identification Numbers (EINs) throughout the LM-20, -10, and -21 forms. However, as we have reported separately (and shared with OLMS), very few of the reports filed in 2025 actually provide EINs for all (or even some) of the consultants, subcontractors, or employers listed.

Our list of LM-10s and LM-21s "owed" for 2024 is compiled in a spreadsheet with hyperlinks to the "triggering" LM-20. The list is sorted alphabetically by employer in the case of the LM-10 and by persuader consultant or subcontractor in the case of the LM-21 spreadsheet. We then verify that each unique employer and each persuader consultant or subcontractor is listed only once, thereby avoiding any duplicate counting.

Our next step is to query the online OLMS Public Disclosure Room database to track those "owed" LM-10 and LM-21 reports **that have been filed**, using the cross-matching technique described above. Where a crossmatch is found, we include a hyperlink to the corresponding LM-10 or LM-21 report and record the filing date and fiscal year ending date. This allows us to track whether those reports filed were timely. In the case of the LM-10s, we record total payments to all persuaders listed. In some cases, notably Amazon, the LM-10 listed detailed payments to multiple consultants, so we consolidated those payments into a single number and reported this as one LM-10 owed (and filed). There were several other employers who reported payments to multiple consultants on their LM-10, and we did the same thing, reporting a single total payment for all consultants, and one reported as owed and filed.

It should be noted that we shared our 2022 and 2023 LM-10 and LM-21 crossmatch spreadsheet with OLMS, including several quarterly updates, and we will do so with this analysis and report. We continue to hope that OLMS may use our analysis to confirm their own crossmatch analysis and to pursue those employers and consultants who either file delinquent reports or, more importantly, those who do not bother to file at all.

<u>LM-10 analysis</u>: The results of our June 30, 2025, analysis of 2024 LM-10 reports owed, filed, and delinquent are summarized in the table below. Note that as of June 30, 2025, only 43% of those 2024 LM-10s "owed" have been filed. As of June 30, 2025, one hundred sixteen have not been filed.

Item	Detail
Total unique LM-10s owed	269
Total unique LM-10s filed	153
Total unique LM-10 NOT FILED	116
Non-filing rate as of 6/30/25	43.1%
Total unique LM-10s filed with \$0	9
Total unique LM-10s filed timely	93
Total unique LM-10s filed late	60
Of those LM-10s filed, percent on-time	60.8%
Total reported expenditures	\$35,156,209

Nine of the 2024 LM-10 reports filed reported zero payments to consultants. Of those employers who did report payments, the total for the year to date is slightly more than \$35 million. Twelve million dollars of this total was accounted for by a single employer, Amazon.

The LM-10 report is due ninety days from the close of the employer's fiscal year. Not all employers use a January 1 to December 31 fiscal year, so we recorded the reported fiscal year ending date in our spreadsheet, along with the filing date, to determine whether the report was timely filed. Of the 153 LM-10s filed to date for 2024, 93 of them (60.8%) were timely filed, and sixty were not.

If we focus just on those filed to date, a 60.8% on-time filing rate does not compare favorably with the 83% on-time filing rate for union annual reports for the same

period. However, this fact is completely overshadowed by the 116 employers who haven't filed at all!

Perhaps a truer way to report on-time filing is to divide the number of timely filed reports (93) by the total LM-10s owed for 2024 (269), which yields an on-time filing rate of thirty-four percent (34%). Those which haven't been filed at all must be considered delinquent along with those filed late.

<u>LM-21 analysis</u>: Our analysis of 2024 LM-21s showed a total of 159 LM-21s owed. However, as of June 30, 2025, only 68 were filed, meaning forty-three percent (43%) of those owed were filed. Ninety-one, or 57%, have not yet been filed.

Of the sixty-eight that were filed, only 55 were submitted within the ninety-day time limit, and 13 were filed late. The "true" on-time filing rate, therefore, is 55 divided by 159, or 34.6%, which is almost identical to the true LM-10 on-time filing rate for 2024.

It should be noted that this delinquency filing rate for both the LM-10 and LM-21 cannot improve, because any of the 91 reports that have not yet been filed will be considered delinquent.

Summary

To quote former OLMS Director Jeff Freund, it is indeed time to put the "M" (Management) back in the Labor-Management Reporting and Disclosure Act. At least when it comes to enforcing the reporting requirements of Title II of the Act, a disproportionate share of resources has been devoted to improving union compliance with reporting, while efforts to improve employer and persuader reporting have been largely neglected. The results clearly show that it is not getting any better; in fact, it may be getting worse.

Recall that the 1984 U.S. House of Representatives Education and Labor Subcommittee report, based on a random sample of 84 LM-10s filed during FY 1979-FY 1983, found that thirty-one percent (31%) of the consultants identified in employer LM-10s failed to file their required LM-20 report. More importantly, of that subset of persuaders who did file their required LM-20 report, only 62% bothered to file the required Form LM-21 annual report! This suggests a huge "reporting gap" where we can categorize persuader consultants into four groups: (1) those who filed an LM-20 and an LM-21; (2) those who filed an LM-20 but not an LM-21; (3) those who filed an LM-21 but no LM-20 (unlikely); and (4) those who filed neither an LM-20 nor an LM-21.

The House Subcommittee report made no findings on LM-10s owed but not filed, but they did note a number of easily observed and corrected deficiencies in the reports they reviewed.

LaborLab's review of 2024 LM-21 reports filed to date reveals that only 43% of those who owed an LM-21 report based on 2024 LM-20 filings have bothered to file an LM-21 to date. Unlike the 1984 report, we based our assessment of LM-21 reports owed not on the LM-10 (which many employers do not bother to file), but on the LM-20 reports; we based ours on a single year. Also, unlike the 1984 report, we based our findings on a 100% sample of 2024 LM-20 reports filed to date, whereas the 1984 report used a random sample of LM-10 reports filed between FY 1979 and 1984.

The 2024 DOL Inspector General report made no attempt to identify non-filers of both Forms LM-10 and LM-21 using their three-year data sample. However, they did report that 605 employers were named in LM-20 reports without a corresponding LM-10 being filed; 1,478 consultants were named in LM-10s with no corresponding LM-20 report being filed; and 142 consultants were named in LM-20s with no LM-21 report being filed under that exact name.

Since the 2024 Inspector General report did not attempt to quantify the number of LM-10s and LM-21 reports "owed" for this three-year period, there is no "denominator" and therefore no way to quantify a percentage of non-filers as LaborLab has done. However, the Inspector General did quantify the delinquency rate among those LM-10s and LM-21s actually filed. For the January 1, 2021, to August 22, 2023, period, DOL's IG found 49% were delinquent ("submitted more than 90 days after the employer's fiscal year end"). Of the 265 delinquent LM-10 reports filed, 14% were between six to 12 months late, and 18% were more than a year late. The DOL IG found that 47% of the LM-21s actually filed during this period were also delinquent, with 10% being 6 to 12 months late and 20% being one or more year late.

Comparing this to LaborLab's findings for a different time period (CY 2024), nearly 40% of those LM-10s actually filed were late, and of those LM-21s actually filed, 13 out of 68 (about 20%) were late. But the IG, unlike LaborLab, failed to calculate the "true" delinquency rate, which must include those reports that were owed but not filed, not just those actually filed.

Finally, the delinquency rate—regardless of when or how calculated—of employer and persuader consultant annual reports does not compare favorably with the 83% on-time filing rate for union annual financial reports. The union rate has improved significantly over the last five years and will likely continue to do so.

Conclusions and Recommendations

The analysis presented in this report unequivocally demonstrates OLMS's capability to enhance on-time reporting when focused efforts are consistently applied over time. The Government Accountability Office (GAO) study provides compelling evidence of this capacity, illustrating a 10% improvement in on-time union report filings over a five-year period and a significant reduction in chronically delinquent reports.

Conversely, documentation from the Department of Labor's own Inspector General reveals a consistently abysmal on-time filing rate (and non-filing rate) for persuader consultants and their engaging employers during the same period. This disparity is particularly notable given that the number of persuaders is approximately 100 times smaller than the number of union filers. While OLMS has successfully developed and implemented effective voluntary compliance programs to improve union on-time filing, comparable initiatives to address employer and persuader reporting deficiencies have been conspicuously absent, despite the significantly smaller population size and corresponding reduction in required resources.

It is therefore imperative that OLMS initiates a systematic and consistent effort to identify persuaders and their engaging employers who fail to file required reports. This can be achieved through robust crossmatching of existing data, a methodology first recommended in 1984 by the U.S. House of Representatives Subcommittee and reiterated forty years later by the Department's own Inspector General. Since 2022, LaborLab has routinely provided OLMS with comprehensive spreadsheets, compiled from LM filings on the OLMS Public Disclosure webpage, that specifically identify unfiled LM–10s and LM–21s, in addition to detailing the delinquency rates for filed reports. Furthermore, LaborLab has submitted numerous complaints over the past three years concerning deficient reports from employers and persuaders, most recently (June 2, 2025) highlighting the widespread failure to provide the Employer Identification Number (EIN) for employers, persuaders, and subcontractors. The issue

of deficient filings is not a new phenomenon, as evidenced by its mention in the 1984 House Subcommittee report.

Substantial improvement in employer and persuader reporting compliance is unlikely to occur without the dedicated allocation of several individuals within OLMS to specifically ensure the timely filing of these owed reports. Historical experience consistently demonstrates that voluntary compliance programs serve as effective tools for enhancing on-time filing. Consequently, the same types of resources that successfully improved union on-time filing should be strategically directed towards LM-10s and LM-21s, given their considerably lower volume compared to LM-2s, LM-3s, and LM-4s. OLMS should therefore establish a voluntary compliance program for persuaders and employers and integrate benchmark data pertaining to these efforts into the annual OLMS report.

LaborLab has consistently shared its crossmatching spreadsheets, methodology, deficiency complaints and its expertise with OLMS and will continue to do so in earnest hope that OLMS will devote the sustained and required resources to correct this glaring discrepancy.

2024 LM-10 Data

Methodology: LM-20s with date entered into in 2024, filed in either 2024 or 2025; for LM-20s with multi-year payment dates (2023 or 2025 in addition to 2024), only 2024 payment dates were counted Green highlights = unique companies (some companies have multiple prime contractors which this accounts for)

Comments	Year LM-20 Filed	LM-20 Link	Employer	Persuader Firm	Prime/Sub	LM-10 Amount	Date Entered Into	FYE End	File Date	Days Elapsed	Timely
	2024	https://olmsapps.dol.gov/query/orgReport.do? rptid=891246&rptForm=LM20Form	3M NEVADA	Government Resources Consultants of America Inc	Prime	\$ 246,945	2024-03-11	12/31/2024	3/31/2025	90	Timely
		https://olmsapps.dol.gov/query/orgReport.do?									
	2024	rptId=892619&rptForm=LM20Form	Accel Entertainment Gaming LLC	LRI CONSULTING SERVICES, INC.	Prime	\$11,192	2024-04-10	12/31/2024	3/31/2025	90	Timely
		https://olmsapps.dol.gov/query/orgReport.do?				40.170		10/01/0004	1/00/0005		
	2024	rptid=893559&rptForm=LM20Form https://olmsapps.dol.gov/query/orgReport.do2	Addus Homecare Corporation	LRI CONSULTING SERVICES, INC.	Prime	\$8,170	2024-05-20	12/31/2024	1/22/2025	22	Timely
	2024		Adusa Transportation	THE LABOR PROS	Prime	\$45,754	2024-09-17	12/31/2024	4/7/2025	97	Delinquent
		https://olmsapps.dol.gov/query/orgReport.do?						,,	.,.,====		
	2024		Aguila Food Distribution	SOLUTIONS LABOR RELATIONS CONSULTING LLC	Prime	\$136,500	2024-09-23	12/31/2024	3/31/2025	90	Timely
		https://olmsapps.dol.gov/query/orgReport.do?									
	2024	rptId=892942&rptForm=LM20Form	Albert Einstein College of Medicine	LRI CONSULTING SERVICES, INC.	Prime	\$37,134	2024-05-02	9/30/2024	5/7/2025	219	-
	2023		Amazon	The Rayla Group	Prime	\$12,661,042		12/31/2024	3/31/2025	90	
	2024		AMC Theaters	ACTION RESOURCES	Prime	\$15,619	0004.01.04	12/31/2024	3/21/2025	80	
	2024	The state of the s	American Bottling Company	RoadWarrior Productions, LLC	Prime	\$476,092	2024-01-24	12/31/2024	2/19/2025	50	
	2024		American Heavy Plates Aquarium of the Pacific	LRI CONSULTING SERVICES, INC. Permanent Solutions Labor Consultants	Prime Prime	\$70,698 \$207,969	2024-09-24 2024-10-03	12/31/2024	2/20/2025 3/28/2025	51 87	
	2024		Alro Steel	Labor Management Associates, LLC	Prime	\$ 13,305	4/28/2024	5/31/2024	11/15/2024	168	· ·
	2024		Aztech Plastering, LLC	RoadWarrior Productions, LLC	Prime	\$21,222	2024-05-24	12/31/2024	3/28/2025	87	
	2024		Basin Disposal	The Vindex Group	Prime	\$193,913	2024-04-01	12/31/2024	3/20/2025	79	
	2024		Behrens & Associates dba	Labor Management Associates, LLC.	Prime	\$26,061		12/31/2024	3/31/2025	90	
	2024		BLOODWORKS NORTHWEST	DAVIS GRIMM PAYNE & MARRA	Prime	\$1,394	2024-01-30	12/31/2024	5/8/2025	128	
	2024		Bob's Heating & Air Conditioning	Davis Grimm Payne & Marra	Prime	\$10,313		12/31/2024	3/24/2025	83	Timely
	2024		Box Partners	THE LABOR PROS	Prime	\$197,916	2024-09-09	12/31/2024	6/2/2025	153	Delinquent
	2024	https://olmsapps.dol.gov/query/orgReport.do?	Breakthru Beverage California, LLC	ACTION RESOURCES	Prime	\$375,765	2024-07-15	12/31/2024	3/19/2025	78	Timely
	2024	https://olmsapps.dol.gov/query/orgReport.do?	Breakthru Beverage Florida	ACTION RESOURCES	Prime	\$762,473	2024-08-20	12/31/2024	3/24/2025	83	
	2024	https://olmsapps.dol.gov/query/orgReport.do?	Builders First Source Inc.	Government Resources Consultants of	Prime	\$80,688	2024-08-12	12/31/2024	3/26/2025	85	Timely
	2025	https://olmsapps.dol.gov/query/orgReport.do?	Burke Rehabilitation Hospital	THE CROSSROADS GROUP LABOR RELATION	Prime	\$168,967	2024-08-20	12/31/2024	3/28/2025	87	
o LM-20 filed	2024		Burke Rehabilitation Hospital	Crossroads	Prime	\$168,967		12/31/2024	3/28/2025	87	
	2025		C & R Restaurant Group, L.P.	ACTION RESOURCES	Prime	\$25,710	2024-08-19	12/31/2024	5/30/2025	150	
	2024		Cabeno Environmental	Labor Management Consultants, LLC	Prime	\$3,993		2/4/2025	5/20/2025	105	
	2024		California Pacific Medical Center	Healthcare Labor Solutions	Prime	\$226,980	2024 27 27	12/31/2024	4/11/2025	101	
	2024 2025		Calpine Operating Servs Co, inc	The AZ Alignment Group Association LRI CONSULTING SERVICES, INC.	Prime Prime	\$3,825 \$157,148	2024-07-07 2024-08-23	12/31/2024 12/31/2024	3/31/2025 5/29/2025	90	- '
	2025		Canadian Solar CANPACK	LRI CONSULTING SERVICES, INC.	Prime	\$105,772	2024-06-23	12/31/2024	1/31/2025	31	
	2024		Capstone Logistics	THE CROSSROADS GROUP LABOR RELATION	Prime	\$16,822	2024-09-06	12/31/2024	5/13/2025	133	
	2025		Carroll Electric Cooperative, Inc.	Labor Management Consultants, LLC	Prime	\$8,808	2024 00 00	12/31/2024	6/2/2025	153	
	2024		CASTLE ENERGY GROUP	Government Resources Consultants of	Prime	\$67,400		12/31/2024	3/11/2025	70	
	2024		Centura Health	Positive Employee Relations	Prime	\$1,793,049		6/30/2024	7/18/2024	18	
	2024		CertaSite	Labor Consulting Group, LLC	Prime	\$65,400	2024-06-26	12/31/2024	5/21/2025	141	Delinquent
	2024		Church World Services	DBA Alliance LRC	Prime	\$50,645	2024-07-26	12/31/2024	6/2/2025	153	Delinquent
	2024	https://olmsapps.dol.gov/query/orgReport.do?	Clarion Home Services /Mr. Holland	EAST COAST LABOR RELATIONS, LLC	Prime	\$54,082	2024-04-30	12/31/2024	2/25/2025	56	Timely
	2024	https://olmsapps.dol.gov/query/orgReport.do?	Claw Freight	LRI CONSULTING SERVICES, INC.	Prime	\$38,307	2024-02-05	12/31/2024	5/20/2025	140	Delinquent
	2024		Columbia Distributing	Davis Grimm Payne & Marra	Prime	\$3,734		6/30/2024	5/20/2025	324	
	2024		Continental Disc Corporation	THE CROSSROADS GROUP LABOR RELATION	Prime	\$15,286	2024-04-14	12/31/2024	3/31/2025	90	- '
	2024		Corwell Health	Healthcare Labor Solutions	Prime	\$1,764,400		12/31/2024	3/27/2025	86	
	2024		Curio Wellness	Peak Employee & Labor Relations	Prime	\$7,864	2024-10-21	12/31/2024	1/31/2025	31	· · · ·
	2024		Darling Ingredients Inc.	Labor Advisors THE CROSSROADS GROUP LABOR RELATION	Prime Prime	\$615,725	2024-02-27	12/31/2024 6/30/2024	3/27/2025 9/27/2024	86 89	'
	2024		Dartmouth-Hitchcock Health		Prime Prime	\$219,917	2024-04-11	12/31/2024	9/27/2024 3/5/2025	64	
	2024		Dick Blick Art Supplies Inc Dolomite Products Company Inc	Greer Consulting, Inc Labor Consulting Group LLC	Prime	\$116,491 \$145,141		12/31/2024	3/5/2025	84	,
	2024		Downtown Dog Lounge	Labor Advisors	Prime	\$ 56,850	2023-03-10	12/31/2024	3/28/2024	88	
	2024		EHS Inc c/o Barclay Damon	LRI CONSULTING SERVICES, INC.	Prime	\$83,482	2024-04-11	12/31/2023	3/31/2025	90	
	2024		Escalante Concrete	EAST COAST LABOR RELATIONS, LLC	Prime	\$ 38,910	2024-07-18	12/31/2024	6/18/2025	169	
	2025		ESCNC, LLC d/b/a Surgery Center of	· · · · · · · · · · · · · · · · · · ·	Prime	\$0		12/31/2024	3/31/2025	90	
	2024		Evergreen Shipping Agency	LRI CONSULTING SERVICES, INC.	Prime	\$45,228	2024-11-11	12/31/2024	3/7/2025	66	
	2025		Farmer Companies	Labor Consulting Group LLC	Prime	\$191,764		1/30/2025	1/30/2025	0	Timely
	2024		FCC Environmental Services of	Quest Consulting	Prime	\$115,403	2024-06-30	12/31/2024	3/18/2025	77	Timely
	2024		Ferguson Fire and Fabrication, Inc	Galilea Corp LLC	Prime	\$50,499	2024-03-26	7/31/2024	11/1/2024	93	
	2024	The state of the s	First Hospitality/dba/Hampton Inn	Quest Consulting	Prime	\$42,823		12/31/2024	5/29/2025	149	
	2024		Flowers Bakeries Sales of NorCal,	Logic Labor Relations, LLC	Prime	\$195,147	2024-06-10	12/28/2024	3/10/2025	72	
	2024		Forward Landfill	Pinnacle Labor Relations	Prime	\$68,222	2024-06-18	12/31/2024	3/28/2025	87	· · ·
	2024		Fuyao Glass America Inc	LRI CONSULTING SERVICES, INC.	Prime	\$17,852	2024-12-02	12/31/2024	5/23/2025	143	
	2024	https://olmsapps.dol.gov/query/orgReport.do?	Goldstar Foods	Quest Consulting	Prime	\$349,826	2024-03-04	6/30/2024	11/5/2024	128	Delinquent

2024	https://olmsapps.dol.gov/auery/oraReport.do?	Goodwill Colorado	THE LABOR PROS	Prime	\$ 165,763	2024-08-28	12/31/2024	5/30/2025	150	Delinquent
2024			+			2024-08-28			_	
		Graham Tire Company of Kearney,	National Labor Relations Advocates, LLC	Prime	\$17,017	0004 05 10	12/31/2024	2/19/2025	50	Timely
2024		Grocery Delivery E-Services USA Inc		Prime	\$162,673	2024-05-12	12/31/2024	3/25/2025	84	Timely
2024		Gruma Corporation	Logic Labor Relations, LLC	Prime	\$10,498	2024-12-04	12/31/2024	6/5/2025		Delinquent
2024		Gunderson Marine and Iron	Employer Labor Solutions	Prime	\$ 29,710	2024-09-27	1/16/2025	1/16/2025	0	Timely
2024		Henry Ford Hospital	HEALTHCARE LABOR SOLUTIONS	Prime	<u>\$0</u>	2024-12-07	12/31/2024	1/28/2025	28	Timely
2024		HILLER, LLC	Government Resources Consultants of	Prime	\$23,141	2024-07-26	12/31/2024	4/1/2025	91	Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	Hilton Domestic Operating	THE LABOR PROS	Prime	<u>\$100,452</u>	2024-09-21	12/31/2024	3/31/2025	90	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	Holaday Parks,Inc	LRI CONSULTING SERVICES, INC.	Prime	\$7,764	2024-08-08	10/31/2024	1/20/2025	81	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	Honeybee Food Corporation	THE LABOR PROS	Prime	\$ 193,645	2024-07-13	12/31/2024	6/10/2025	161	Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	Horizon Health Alliance	LRI CONSULTING SERVICES, INC.	Prime	\$34,460	2024-07-22	12/31/2024	1/23/2025	23	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	HOWMET AEROSPACE	Government Resources Consultants of	Prime	\$119,547	2024-10-28	12/31/2024	3/6/2025	65	Timely
2024		ImageCare	HEALTHCARE LABOR SOLUTIONS	Prime	\$46,307	2024-09-25	12/31/2024	3/24/2025	83	Timely
2024		Imperial Company	LRI CONSULTING SERVICES, INC.	Prime	\$91,897	2024-03-29	12/30/2024	3/7/2025	67	Timely
2024		InnerCare	EAST COAST LABOR RELATIONS, LLC	Prime	\$577.145	2024-06-05	12/30/2024	12/31/2024	1	Timely
2024		Insituform Technologies, LLC	Employer Labor Solutions	Prime	\$84,488		12/31/2024	2/24/2025	55	Timely
2024		Integrity Painting & Decorating	LRI CONSULTING SERVICES, INC.	Prime	\$58,376	2024-05-02	12/31/2024	1/16/2025	16	Timely
2024		J&J Snack Foods Corp	LRI CONSULTING SERVICES, INC.	Prime	\$106,400	2024-03-14	9/30/2024	12/10/2024	71	Timely
2024		Jersey Elevator	Logic Labor Relations, LLC	Prime	\$ 11.977	2024-05-14	5/27/2025	5/30/2025	3	Timely
2024		,		Prime	\$97,535	2024-11-06	12/31/2024			
		Jet Services	Greer Consulting, Inc			2024 24 12		5/20/2025		Delinquent
2024		Knott's Berry Farm	LRI CONSULTING SERVICES, INC.	Prime	\$105,079	2024-04-16	12/31/2024	5/6/2025		Delinquent
2024		Labcorp/Oregon	EAST COAST LABOR RELATIONS, LLC	Prime	\$393,828	2024-03-25	12/31/2024	3/28/2025	87	Timely
2024		Landis Mechanical, Inc	EAST COAST LABOR RELATIONS, LLC	Prime	<u>\$7,176</u>	2024-08-21	12/31/2024	5/29/2025		Delinquent
2024		LINEAGE LOGISTICS	Government Resources Consultants of	Prime	\$0	2024-09-30	12/31/2024	1/17/2025	17	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	LIPARI FOODS	Government Resources Consultants of	Prime	\$65,083	2024-09-23	12/31/2024	3/26/2025	85	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	louis Padnos Iron and Metal	Labor Consulting Group LLC	Prime	\$72,297		12/31/2024	3/17/2025	76	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	LUFKIN Industries	Quest Consulting	Prime	<u>\$142,585</u>		12/31/2024	3/31/2025	90	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	Magic of David Copperfield	RoadWarrior Productions, LLC	Prime	\$8,176	2024-09-02	12/31/2024	3/31/2025	90	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	Mahoney Environmental	Labor Management Consultants, LLC	Prime	\$4,710	2024-07-22	12/31/2024	5/30/2025	150	Delinquent
2024		Mascoma LLC	LRI CONSULTING SERVICES, INC.	Prime	\$53,630		12/31/2024	2/6/2025	37	Timely
2024		Masonite	LRI CONSULTING SERVICES, INC.	Prime	\$42,459		12/31/2024	3/27/2025	86	Timely
2024		MBM Logistics LLC	ACTION RESOURCES	Prime	\$243,746	2024-07-19	12/31/2024	3/27/2025	86	Timely
2024		McLaren Bay Special Care	Employer Labor Solutions	Prime	\$43,898		9/30/2024	12/31/2024		Delinquent
2024		Mercedes-Benz U.S. International,	RoadWarrior Productions, LLC	Prime	\$659,116	2024-04-26	12/31/2024	2/14/2025	45	Timely
2024		Merit Logistics	LABOR INFORMATION SERVICES INC	Prime	\$30,031	2024-09-23	3/19/2025	3/24/2025	- 5	Timely
2024		· · · · · · · · · · · · · · · · · · ·			\$59.346	2024-03-23	12/31/2024	5/12/2025	132	
2024		National DCP	LRI CONSULTING SERVICES, INC. LABOR INFORMATION SERVICES INC	Prime Prime	\$7,981	2024-07-19	12/31/2024	5/26/2025		Delinquent Delinquent
		Neuro Psychiatric Hospitals								
2024		New Era, Inc d/b/a Heritage Steel	Mitchell, Ross, Rocconi and McMillan	Prime	\$5,000		12/31/2024	5/19/2025		Delinquent
2024		Newport Healthcare	LRI CONSULTING SERVICES, INC.	Prime	\$130,954		12/31/2024	2/3/2025	34	Timely
2024		NFI Industries	Quest Consulting	Prime	\$ 93,256	2024-08-12	12/31/2024	6/2/2025		Delinquent
2024		Nixon Medical Center	BJC & Associates, INC	Prime	\$ 70,413	2024-06-07	12/31/2024	5/30/2025		Delinquent
2024		Northeastern Center Inc	LRI CONSULTING SERVICES, INC.	Prime	\$19,426	2024-01-04	6/30/2024	5/22/2025		Delinquent
2024		Open Kitchens	LRI CONSULTING SERVICES, INC.	Prime	\$81,741		12/31/2024	5/27/2025		Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	ORCHID ORTHOPEDIC SOLUTIONS	National Labor Relations Advocates, LLC	Prime	\$169,087	2024-04-25	12/31/2024	5/29/2025	149	Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	Pediatric Specialty Care Medical	LABOR INFORMATION SERVICES INC	Prime	\$0		12/31/2024	6/2/2025	153	Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	PetSmart, Inc.	LRI CONSULTING SERVICES, INC.	Prime	<u>\$0</u>	2024-12-05	2/2/2025	5/2/2025	89	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	Planned Parenthood of Greater	LRI CONSULTING SERVICES, INC.	Prime	\$15,570	2024-11-08	12/31/2024	5/8/2025	128	Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	Plant Site Logistics Inc	LRI CONSULTING SERVICES, INC.	Prime	\$14,087	2024-03-08	12/31/2024	1/8/2025	8	Timely
2024		PowerPak Civil & Safety LLC	LRI CONSULTING SERVICES, INC.	Prime	\$425	2024-09-05	12/31/2024	3/25/2025	84	Timely
2024		Premier Brands of America Inc	LRI CONSULTING SERVICES, INC.	Prime	\$30,881	2024-11-04	12/31/2024	5/28/2025	148	Delinquent
2024		Premier Health	Labor Educators LLC	Prime	\$122,155	2024-01-25	12/31/2024	3/23/2025	82	Timely
2024		Pye-Barker Fire & Safety	THE CROSSROADS GROUP LABOR RELATION	Prime	\$ 67,168	2024-08-29	12/31/2024	3/21/2025	80	Timely
2024		R.W. Warner Inc.	National Labor Relations Advocates, LLC	Prime	\$116,583	2024-01-19	5/7/2024	5/7/2024	0	Timely
2024		RCI Mechanical	National Labor Relations Advocates, LLC	Prime	\$48,402	2024-01-19	12/31/2024	3/13/2025	72	Timely
2024										
		Rivers Portsmouth Gaming, LLC	THE LABOR PROS	Prime	\$0	2024-09-11	12/31/2024	5/30/2025		Delinquent
2024		S&S Activewear	LR Consultants LLC	Prime	\$9,300		12/31/2024	3/13/2025	72	Timely
2024		Satellite Fulfillment	EAST COAST LABOR RELATIONS, LLC	Prime	\$34,226	2024-07-29	12/31/2024	3/24/2025	83	Timely
2024		Sam-Will, Inc	RoadWarrior Productions, LLC	Prime	\$401,982	2024-02-24	12/31/2024	3/31/2025	90	Timely
2024		San Diego Humane Society	ACTION RESOURCES	Prime	\$0		6/30/2024	9/6/2024	68	Timely
2025		Sapporo-Stone Brewing	Government Resources Consultants of	Prime	\$114,124		12/31/2024	3/6/2025	65	Timely
2024		Silvi Materials	EAST COAST LABOR RELATIONS, LLC	Prime	\$31,450		12/31/2024	6/5/2025		Delinquent
2024	https://olmsapps.dol.gov/query/orgReport.do?	Sixt Rent A Car, LLC	THE LABOR PROS	Prime	\$385,965	2024-06-16	12/31/2024	3/31/2025	90	Timely
2024		Southwest Gas Corporation	Quest Consulting	Prime	\$222,213	2024-03-14	12/31/2024	3/21/2025	80	Timely
2024	https://olmsapps.dol.gov/query/orgReport.do?	Southwest Traders Inc	LRI CONSULTING SERVICES, INC.	Prime	\$ 26,089	2024-01-07	12/31/2023	5/10/2024	131	Delinquent
2024		Specs Family Partners LTD	Logic Labor Relations, LLC	Prime	\$545,139	2024-07-22	12/31/2024	2/21/2025	52	Timely
2024		Staenberg-Loup Jewish	THE CROSSROADS GROUP LABOR RELATION	Prime	\$16,681	2024-03-08	12/31/2024	3/21/2025	80	Timely
2024		Summer Garden Food	Labor Consulting Group, LLC	Prime	\$123.643	2024-02-07	12/31/2024	5/28/2025		Delinquent
	https://olmsapps.dol.gov/query/orgReport.do?	Sun Chemical Corporation	LRI CONSULTING SERVICES, INC.	Prime	\$86,544	2024-02-20	12/31/2024	5/15/2025	135	Delinquent

2024 https://ol										
	lmsapps.dol.gov/query/orgReport.do?	Sunshine Disposal	Labor Advisors	Prime	\$8,280		12/31/2024	3/25/2025	84	Timely
	lmsapps.dol.gov/query/orgReport.do?	Sutter Roseville Medical Center	HEALTHCARE LABOR SOLUTIONS	Prime	\$69,483	2024-02-21	12/31/2024	4/11/2025	101	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Sygma Corporation	Government Resources Consultants of	Prime	\$341,340		6/30/2024	10/23/2024	115	Delinquent
LM-20 was filed in 2023 2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Sysco Corporation - Knoxville	Logic Labor Relations, LLC	Prime	\$520,710		6/30/2024	11/6/2024	129	Delinquent
LM-20 was filed in 2023 2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Sysco Corporation - Louisville	Logic Labor Relations, LLC	Prime	\$86,196		6/30/2024	11/6/2024	129	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Sysco Corporation - Portland	Government Resources Consultants of	Prime	<u>\$0</u>		6/30/2024	11/6/2024	129	Delinquent
2024 https://ol	Imsapps.dol.gov/query/orgReport.do?	Thermoflex	RoadWarrior Productions, LLC	Prime	\$785,800	2024-03-22	12/31/2024	5/27/2025	147	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Torre Refuse & Recycling LLC	Davis Grimm Payne & Marra	Prime	<u>\$1,741</u>		12/31/2024	3/25/2025	84	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Total Management Inc and I & S LLC	LRI CONSULTING SERVICES, INC.	Prime	\$10,366	2024-03-12	12/31/2024	3/10/2025	69	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Tower Health/Pottstown	EAST COAST LABOR RELATIONS, LLC	Prime	\$102,284	2024-07-22	6/30/2024	1/10/2025	194	Delinquent
2025 https://ol	lmsapps.dol.gov/query/orgReport.do?	Trap Rock & Granite Quarries LLC	Labor Consulting Group LLC	Prime	\$68,671		12/31/2024	3/31/2025	90	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	TWCA Inc.	THE CROSSROADS GROUP LABOR RELATION	Prime	\$8,434	2024-06-06	12/31/2024	3/12/2025	71	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	U.S. SUGAR SAVANNAH REFINERY	Government Resources Consultants of	Prime	\$468,370	2024-01-22	10/31/2024	12/13/2024	43	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	ULC TECHNOLOGIES	Government Resources Consultants of	Prime	<u>\$0</u>	2024-11-11	12/11/2024	12/19/2024	8	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Ultra Maritime	Labor Consulting Group LLC	Prime	\$747,578		12/31/2024	3/26/2025	85	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	UNITED PLUMBING CO.	Government Resources Consultants of	Prime	\$40,365	2024-10-14	12/31/2024	5/5/2025	125	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Upper Cumberland Electric	LRI CONSULTING SERVICES, INC.	Prime	\$71,926		12/31/2024	5/29/2025	149	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	USIC LLC	LRI CONSULTING SERVICES, INC.	Prime	\$514,603		12/31/2024	5/21/2025	141	Delinquent
2025 https://ol	lmsapps.dol.gov/query/orgReport.do?	Vacuum Truck Rentals	LRI CONSULTING SERVICES, INC.	Prime	\$23,145		12/31/2024	5/5/2025	125	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Valley Regional Medical Center	HMD CONSULTING SERVICES INC	Prime	\$111,045	2024-04-01	12/31/2024	6/3/2025	154	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Ventura Foods	Government Resources Consultants of	Prime	\$174,754		3/31/2025	5/28/2025	58	Timely
2024 https://ol	Imsapps.dol.gov/query/orgReport.do?	Vin Lux Wine Transport Co.	Logic Labor Relations, LLC	Prime	\$28,548	2024-05-17	12/31/2024	2/21/2025	52	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Walgreen Co	LRI CONSULTING SERVICES, INC.	Prime	\$ -	8/29/2024	8/31/2024	6/25/2025	298	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	Webasto Roof Systems inc	Labor Consulting Group LLC	Prime	\$1,329,918		12/31/2024	2/27/2025	58	Timely
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	White Plains Hospital	THE CROSSROADS GROUP LABOR RELATION	Prime	<u>\$</u> 22,590	2024-02-19	12/31/2023	8/1/2024	214	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	XL Concrete and Masonry	RoadWarrior Productions, LLC	Prime	\$ 18,877	2024-10-27	12/31/2024	6/10/2025	161	Delinquent
2024 https://ol	lmsapps.dol.gov/query/orgReport.do?	ZF Group	LRI CONSULTING SERVICES, INC.	Prime	\$40,141	2024-03-22	12/31/2024	3/10/2025	69	Timely

2024 LM-21 Data

NF = not filed							
	Persuader	Date 2024 LM-21 Filed	Complete (Itemized)?	Total Receipts (Part B)	Total Sub- Contractor Payments (Part D)	Deficient?	Deficiencies
	A TO Z LABOR CONSULTING	NF					
	A&S Consulting Services Inc.	<u>4/6/25</u>	No	\$0	\$0	Yes	Part D Incomplete
	About Business, Inc.	NF					
	ACTION RESOURCES	3/26/25	No	\$0	\$0	Yes	Part D Incomplete
	Alai Olivarria	NF					
	Alan Ashe	NF					
	Aleaha Zeller	NF					
	Alejandro Rique-Gamboa	NF					
	Alfred R Lacy	<u>3/31/25</u>	Yes	\$132,564	\$0	No	
	ALG HR Solutions	NF					
	Angela Perez	NF					
	Armor and Royalty Consultant LLC	NF					
	Avery Consultant LLC	NF					
	Bardi Education Services	3/28/25	No	\$0	\$0	Yes	Part D Incomplete
	BJC & Associates, INC	<u>2/19/25</u>	No	\$0	\$0	Yes	Part D Incomplete
	Bradley K Rechel, LLC	<u>2/19/25</u>	No	\$0	\$0	Yes	Part D Incomplete
	Bridge Labor Solutions, LLC.	NF					
rror in Part D	C HUNT MANAGEMENT CONSULTING INC	3/29/25	Yes	\$163,474	\$23,815	No	
	CANNON LABORS RELATIONS, LLC	<u>2/8/25</u>	Yes	\$0	\$0	Yes	Part D Incomplete
	Cesar Lopez	NF					
	Chuck Ahern	NF					
	CME HR Consulting LLC	NF					
	Cold Mountain Enterprises LLC	NF					
	Concordia Resolve Consulting, Inc.	3/31/25	No	\$0	\$0	Yes	Part D Incomplete
	Corsair Ventures, LLC	NF					
	Courage to Elevate LLC	NF					
	CRS Labor Relations Solutions, LLC	NF					
	Culture Built LLC	NF					
	Cummings Group, LLC	<u>3/31/25</u>	No	\$0	\$0	Yes	Part D Incomplete
	D&G Creative Consulting LLC	NF					
	Danielle Burke	NF					
	Davis Grimm Payne & Marra	3/27/25	Yes	\$3,734	\$0	Yes	Part D Incorrectly Completed
	DBA Alliance LRC	NF					
	Devon E Hannagan	<u>3/31/25</u>	Yes	\$93,863	\$0	No	
	DG&Associates	NF					
	DMC LLC	NF					
	E&E Partners, LLC	NF					

EAST COA	AST LABOR RELATIONS, LLC	2/13/25 Yes	\$0	\$0 Yes	Part D Incomplete
Edward H	linkle	3/28/25 Yes	\$343,749	\$0 No	·
EDWARD	M ECHANIQUE	NF			
Edward S	mith/ESMITH	NF			
EHernand	dez Consulting	NF			
Elizabeth	•	NF			
Employer	Labor Solutions	3/29/25 Yes	\$273,950	\$168,604 No	
ERCOGO	LLC	3/26/25 Yes	\$0	\$0 Yes	Part D Incomplete
ERIC J VA	NETTI	3/29/25 Yes	\$0	\$0 No	
Espo Emp	ployee Relations LLC	2/21/25 No	\$0	\$0 Yes	Part D Incomplete
Eternity S	ouls DBA Labor Advisors	NF			·
EVGV, LLC		3/29/25 No	\$0	\$0 Yes	Part D Incomplete
Fernando	o A Rivera	3/25/25 Yes	\$0	\$0 Yes	Part D Incomplete
Finance S	Sensei, LLC	NF			-
	por Consulting	4/16/25 No	\$0	\$0 Yes	Part D Incomplete
dded - 2024 LM-20 ac Flores Lak	ū	4/16/25 No	\$0	\$0 Yes	Part D Incomplete
	onsulting LLC	NF NF			- F
	Labor Relations, Inc.	NF			
	Mattes and Associates Inc	NF			
Galilea C	orp LLC	11/10/24 Yes	\$50,499	\$0 Yes	Part D Incorrectly Completed
	Brien & Associates	NF			, , ,
Glesener	Labor LLC	NF			
GNE Cons	sulting Services, Inc.	3/15/25 No	\$0	\$0 Yes	Part D Incomplete
	ent Resources Consultants of Americ	3/27/25 Yes	\$5,641,666	\$3,116,612 No	'
	nsulting, Inc	NF			
	ARE LABOR SOLUTIONS	3/29/25 Yes	\$3,192,981	\$1,871,932 No	
	ed Solutions	3/28/25 No	\$0	\$0 Yes	Part D Incomplete
	ISULTING SERVICES INC	3/31/25 No	\$0	\$567,599 No	
Huis Grou		NF			
	esources Advisory Practice	NF			
	dent Center for Worker Education	2/10/25 Yes	\$0	\$0 Yes	Part D Incomplete
dded - 2024 LM-20 a IvyLink Co		4/1/25 No	\$0	\$0 Yes	Part D Incomplete
	r Consultants	NF			
JBL & Ass		NF			
JF Manac	gement & Consulting LLC	NF			
Jose Agro		4/14/25 Yes	\$0	\$0 Yes	Part D Incomplete
	embrano	NF NF	7-	7 30	
Justin She		3/31/25 No	\$0	\$0 Yes	Part D Incomplete
Kamilyn \		NF	*-	Ţ- : 3 0	
,	cell Consulting	3/24/25 Yes	\$24,341	\$0 Yes	Part D Incomplete
Keith Willi	•	4/9/25 Yes	\$112,517	\$0 Yes	Part D Incomplete
-	STRIAL RELATIONS LLC	NF	ψ=,517	Ç2 100	
Kulture Ko		NF			

KV Information	4/2/25 Yes	\$1,636,686	\$1,125,343	No	
L & L Management Inc	NF				
LAAHR Human Resources Management	NF				
Labor Advisors	NF				
Labor Consulting Group, LLC	NF				
Labor Educators LLC	NF				
LABOR INFORMATION SERVICES INC	3/27/25 Yes	\$585,000	\$402,213	No	
Labor Management Associates, LLC	<u>3/17/25</u> Yes	\$563,632	\$205,250	No	
Labor Management Consultants, LLC	3/31/25 Yes	\$19,915	\$0	Yes	Part D Incomplete
LABOR RELATIONS LMP INC/Luisa Perez	<u>3/31/25</u> No	\$0	\$0	Yes	Part D Incomplete
Labor Relations Specialists LLC	NF				
Larry Wold	NF				
LEV LABOR LLC	<u>4/1/25</u> No	\$0	\$1,728,648	No	
Lewis Labor Relations	NF				
Libra Management Consulting Inc	NF				
Lighto Labor Inc.	3/25/25 Yes	\$0	\$0	Yes	Part D Incomplete
LKLS Consulting	NF				·
Added - 2024 LM-20 a LNM Services IIc	5/15/25 Yes	\$132,288	\$0	Yes	Part D Incomplete
Logic Labor Relations, LLC	3/25/25 No	\$0	\$1,454,237	No	'
LR Consultants LLC	NF				
LRI CONSULTING SERVICES, INC.	4/9/25 No	\$0	\$3,400,957	No	
Luis Amaya	NF				
M. Rosado Consultants, LLC	NF				
MAJ Consulting Services LLC	NF				
Marielys Betancourt	NF				
MCM Labor Advisors	NF				
Michael Caserta	NF				
Millennium Labor Consulting Solutions, LLC.	NF				
Mitchell, Ross, Rocconi and McMillan	2/23/2024 Yes	\$5,000	\$0	Yes	Incomplete Year; Part D Incomplete
National Labor Relations Advocates, LLC	NF				
National Labor Strategies	NF				
Niles Commer	NF				
O'Mara & Associates, LLC	3/28/25 No	\$0	\$0	Yes	Part D Incomplete
Octavio Perez	NF				
Omar Cuadra	3/30/25 Yes	\$151,396	\$0	Yes	Part D Incomplete
Oscar Wilmington	4/1/25 No	\$0	\$0	Yes	Pard D Incomplete
P.A.S Labor	NF				•
Pantera Consulting Inc	3/31/25 Yes	\$1,214,618	\$425,737	No	
Peak Employee & Labor Relations	NF				
People Optimum Consulting	NF				
People Solution Consultants	3/25/25 Yes	\$106,027	\$0	Yes	Part D Incomplete
Perceptive Consulting	NF				
Permanent Solutions Labor Consultants	NF				

Pinnacle Labor Relations	NF				
Pinnacle Labor Solutions, Inc.	NF				
Positive Employee Relations	3/29/25 Yes	\$2,845,725	\$1,637,993	No	
PROGRESSIVE LABOR SOLUTIONS	3/31/25 Yes	\$130,913	\$0	Yes	Part D Incomplete
Quality Labor Solutions	3/21/25 Yes	\$0	\$0	Yes	Part D Incomplete
Quest Consulting	<u>4/1/25</u> Yes	\$2,389,487	\$1,622,272	No	
RallainConsultingLLC	NF				
Reconnect Labor Relations Consultants, Inc	NF				
Richard Scott Michel	<u>3/7/25</u> Yes	\$123,100	\$0	Yes	Part D Incomplete
Ride Muro LLC	NF				
RoadWarrior Productions, LLC	3/31/25 Yes	\$4,868,981	\$2,619,180	No	
Santana International, Inc	NF				
SAPENOFF CONSULTING	<u>3/3/25</u> No	\$0	\$0	Yes	Part D Incomplete
Lucy Jenkins Management and Consulting LLC	NF				
Smith & Downey, P.A	3/29/25 Yes	\$14,237	\$0	Yes	Part D Incomplete
SOLUTIONS LABOR RELATIONS CONSULTANTS/SO	NF				
dded - 2024 LM-20 a Stephen Whitehead	<u>4/11/25</u> Yes	\$40,534	\$0	Yes	Part D Incomplete
Strategic Labor Consulting Group	3/31/25 No	\$0	\$0	Yes	Part D Incomplete
Tandem, LLC	NF				
Taylor Lee	NF				
The AZ Alignment Group Association	3/31/25 Yes	\$3,825	\$0	No	
THE BENNETT LAW FIRM, P.A.	3/25/25 Yes	\$21,090	\$0	No	
THE CROSSROADS GROUP LABOR RELATION CON	3/27/25 Yes	\$352,739	\$153,441	No	
The Golden Rule LLC	NF				
THE LABOR PROS	NF				
The Rayla Group	3/31/25 No	\$0	\$1,312,470	No	
The TAG Group	NF				
The Tally Consultancy	3/31/25 No	\$0	\$0	Yes	Part D Incomplete
The Vindex Group	3/31/25 No	\$0	\$318,789	No	
Tindall Consulting, LLC	NF				
Todd Turner/Innovative Employee Solutions	<u>5/11/25</u> No	\$0	\$0	Yes	Part D Incomplete
Unboxted, LLC	NF				
VIF Estates	NF				
William G Monroe	NF				
Wolfe HR Consulting LLC	3/10/25 No	\$0	\$0	Yes	Part D Incomplete
Zoila Garcia	NF				