



August 5, 2025

LABORLAB DEFICIENCY/DELINQUENCY COMPLAINT #556

To whom it may concern,

We are writing to file a complaint regarding potential violations of the Labor-Management Reporting and Disclosure Act (LMRDA) by David Bax and his firm, Labor Strategy Partners. Bax has been working on behalf of UnityPoint Health to persuade workers against unionizing.

David Bax has seemingly been hired by UnityPoint Health as a "labor relations consultant," but has not filed any of the required LM-20 disclosures. In fact, it appears that Mr. Bax and Labor Strategy Partners have never filed an LM-20 or an LM-21. As such we are concerned that Mr. Bax will continue this pattern of noncompliance and nondisclosure.

Nature of Complaint:

1. **Failure to File LM-20s:** According to our information, Bax has been meeting with workers at UnityPoint Health. However, to date, no LM-20 report has been filed with the OLMS disclosing the consultant's activities and financial arrangements. In fact, no LM-20 has ever been filed by Bax or Labor Strategy Partners. We are concerned that Bax may not file the report at all.
2. **Failure to File LM-21:** According to our information, neither Mr. Bax nor Labor Strategy Partners have ever filed an LM-21, despite engaging in reportable activity.

Request for Action:

LaborLab urges the OLMS to investigate this matter promptly. We request that the OLMS:

- Ensure that the LM-20 report is filed disclosing all relevant details.
- Ensure that all LM-21 reports are filed disclosing all relevant details.

We believe that ensuring transparency and protecting workers' rights are paramount. We appreciate your time and attention to this matter.