



August 15, 2025

LABORLAB LMRDA NON-COMPLIANCE COMPLAINT REGARDING WESTINGHOUSE  
ELECTRIC CORPORATION'S USE OF PERSUADERS.

Please direct all correspondence to:

Bob Funk, Executive Director

To whom it may concern,

We are writing to call attention to what appears to be an exceptionally large number of violations of the LMRDA centered around Westinghouse Electric Corporation's hiring of persuaders in its [2024 anti-union campaign](#). Notably, Westinghouse – which is [majority-owned by Brookfield Renewable Partners](#) – [has been charged by IBEW](#) for engaging in a wide range of unfair labor practices in 2023 and 2024, including some directly involving these persuaders (see the attached unfair labor practice charges). We believe the scope and magnitude of these probable disclosure violations are emblematic of the flagrant disregard employers and persuader consultants have for their legal reporting requirements. As our complaint will demonstrate, the widespread non-compliance with reporting requirements during Westinghouse's counter-organizing campaign denied IBEW members the ability to learn [before a union election at Westinghouse began](#) about the hiring, contracted activities and pay rates of *any* of the 12 individual persuaders who were hired to counter IBEW's organizing drive – **thereby completely undermining the purpose of the LM-20 filing requirement.**

We hope that OLMS will take swift action to correct and remediate any reporting misconduct in this case, especially given the potential contextual relevance of the missing or deficient disclosures to the aforementioned [unfair labor practice charges](#). We further hope that OLMS will endeavor to address the much larger pattern of non-compliance documented in a recent [LaborLab report](#). There is a dire need to begin closing the gaping reporting compliance gap between unions on the one hand and employers and persuader consultants on the other. Correcting and remediating the many instances of LMRDA non-compliance surrounding Westinghouse's anti-union campaign is a promising place to start.

The potential violations we report here include:



- **The failure of Westinghouse Electric Corporation to file their 2024 LM-10.** This LM-10 should report payments to all persuaders who interacted with workers during its counter-organizing campaign.
- The failure of 5 of 12 individual **consultants to ever file LM-20s for the persuader activities they engaged in on behalf of Westinghouse Electric Company.**
- The delinquent filing (more than 30 days after the date of a persuader agreement) of nine of the 10 LM-20s that were filed.
- **The failure of 12 *persuader individuals or organizations* used by Westinghouse Electric Company to file 2024 LM-21s**, with eight of the non-filers having never filed an LM-21 ever.
- **The failure of KV Information to provide on [its LM-21](#)** the names of its employer clients or the EIN numbers for both its employer clients and the individual persuaders that it used.

These widespread deficiencies and delinquencies are detailed below:

### ***LM-10 non-filing complaint against Westinghouse Electric Corporation***

- Westinghouse Electric Corporation has been identified on nine LM-20s (see examples of filings [by KV Information](#) and [Bridge Labor Solutions](#)) as having hired persuader consultancies (who in turn subcontracted some persuader activities to other consultancies and individuals) to counter a union drive at its Columbia Fuel Fabrication Facility.
- These LM-20 filings trigger the requirement for Westinghouse to file an annual LM-10 report that discloses the use of these persuaders, the nature of their reportable activities and the payments made to them for those activities. However, to date, no LM-10 report has been filed with the OLMS disclosing this information. The permissible filing window of 90 days following the end of the 2024 fiscal year without a disclosure has elapsed. We are concerned that Westinghouse Electric Company may not file the report at all.
- Despite this non-filing, annual LM-21 reports filed by KV Information and Bridge Labor Solutions indicate that Westinghouse paid at least a combined \$836,186 to those consultancies alone, including [\\$574,602](#) to KV Information and [\\$261,584 to Labor Management Associates](#). Westinghouse's filing of an LM-21 will clarify whether the employer spent any more than \$886,186 on persuader activities, the number and names of the consulting firms used, and the nature of the contracted persuader activities.
- The need for Westinghouse Electric Company to make these disclosures is all the more imperative given that they concern a period during which the employer is alleged to have engaged in a wide range of unfair labor practices, including when one of the consultants retained by Westinghouse, Wildine Barrett, allegedly made coercive statements and



threats to employees, and also when other consultants allegedly solicited grievances and made implied promises to fix them.

- Workers, NLRB officials and the public are legally entitled to know the full magnitude, scope and nature of the persuader activities that Westinghouse paid for as these unfair labor practices charges against Westinghouse are litigated.

### **LM-20 non-filing complaints against 5 of 12 individual consultants that engaged in or provided persuader activity for Westinghouse in its anti-union campaign**

- **Any persuader individual who contracts or engages in reportable persuader activity** must file an LM-20 for each persuader arrangement or agreement under which they contracted or engaged in the reportable activity for an employer. This requirement applies regardless of whether the individual is self-employed, is an officer of the persuader organization and/or is an employee of the persuader organization.
- The following persuader individuals who contracted or engaged in persuader activity on behalf of Westinghouse have not filed LM-20s.
  - [Daniel Barrett](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Barret as a subcontractor affiliated with Bridge Labor Solutions)
  - [Ichana Destin](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Destin as a subcontractor affiliated with Bridge Labor Solutions)
  - [Webs Pierre](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Webs Pierre as a subcontractor affiliated with Bridge Labor Solutions)
  - [Luis Camarena](#) (LM-20 filed by KV Information CEO Karen Velasco names Camarena as a subcontractor affiliated with LKLS Consulting in an)
  - [Eduardo Padilla](#) (LM-20 filed by Alejandro Rique-Gamboa as a self-employed individual names Padilla as a subcontractor affiliated with Libra Management Consulting)
- The permissible filing window of 30 days after which these individuals entered into an agreement to provide or engage in reportable persuader activity has elapsed. They are therefore in violation of their reporting requirements.
- We are concerned that these persuader organizations may not ever file their required LM-20 for the persuader activity they provided or engaged in at Westinghouse.

### **LM-20 delinquency complaints for nine of 10 LM-20s that were filed in connection with Westinghouse's counter-organizing campaign**



- Moreover, nine of the 10 LM-20s that were filed in connection with Westinghouse's counter-organizing campaign were filed past the permissible filing window of 30 days, with five of these filed *more than 60 days* past deadline.
  - The nine delinquent LM-20s were filed by [Daniel Block](#), Alejandro Rique-Gamboa ([1](#) and [2](#)), [Wildine Pierre](#), [Luis A Alvarez](#), [Douglas R Grima](#), Sean Lyles ([1](#) and [2](#)) and [Karen Velasco](#).
- The 30-day window is meant to ensure that workers can discover information on persuaders hired to influence their voting decision *before* they have already voted.
- But the delinquent filing of these forms denied workers that opportunity. Even the most timely of the mandatory disclosures related to the Westinghouse counter-organizing campaign were made *after the union election had already started*. Thus, by filing their required LM-20s just before the deadline, past deadline or not at all, **all 12 of the individual persuaders involved in the campaign completely undermined the purpose of the LM-20 requirement by denying workers the ability to learn about their hiring, activities and pay rates before the workers could begin voting.**
- In order to deter such circumvention of reporting requirements in the future, we believe the persuaders who filed their forms after the required deadline should be held accountable.

### **LM-21 non-filing complaints against 12 persuader individuals or organizations used by Westinghouse in its anti-union campaign**

Any self-employed *individual* or *organization* that (through an officer or employee) contracts to provide or engage in reportable persuader activity must file an LM-21 for the fiscal year in which they engaged in reportable persuader activity within 90 days of the end of the fiscal year. This requirement applies if the self-employed individual or organization is the primary contractor (hired directly by the employer), if the self-employed individual or organization is the "first-tier subcontractor" (the subcontractor contracted by the primary persuader organization or self-employed individual) or even if the organization is the "second-tier subcontractor" of the "first-tier subcontractor" (the subcontractor contracted by the first-tier subcontractor).

- The following individuals or organizations named on LM-20s associated with the Westinghouse anti-union campaign have not filed 2024 LM-21s as or through organizations or as self-employed individuals:
  - [Unboxed LLC](#) (LM-20 filed by President Sean Lyles)
  - [DG&Associates](#) (LM-20 filed by CEO Douglas R Grima)
  - [Libra Management Consulting Inc](#) (LM-20 filed by Officer Alejandro Rique-Gamboa)

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- [Alejandro Rique-Gamboa](#) (LM-20 filed by Alejandro Rique-Gamboa as a self-employed individual)
    - Two separate LM-20 filings indicate that Rique-Gamboa evidently contracted both as an officer of Libra Management Consulting Inc. and as a self-employed individual
  - [Bridge Labor Solutions, LLC](#) (LM-20 filed by President Wildine Pierre)
  - [Culture Built LLC](#) (LM-20 filed by President Luis A Alvarez)
  - [LKLS Consulting](#) (LM-20 filed by KV Information CEO Karen Velasco with LKLS Consulting listed the organizational affiliation of subcontractor Luis Camarena)
  - [Daniel Barrett](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Barret as a subcontractor affiliated with Bridge Labor Solutions)
  - [Ichana Destin](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Destin as a subcontractor affiliated with Bridge Labor Solutions in an)
  - [Webs Pierre](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Webs Pierre as a subcontractor affiliated with Bridge Labor Solutions in an)
  - [Luis Camarena](#) (LM-20 filed by KV Information CEO Karen Velasco names Camarena as a subcontractor affiliated with LKLS Consulting in an)
  - [Eduardo Padilla](#) (LM-20 filed by Alejandro Rique-Gamboa as a self-employed individual names Padilla as a subcontractor affiliated with Libra Management Consulting)
- The permissible filing window of 90 days following the end of the 2024 fiscal year without a disclosure has elapsed. They are therefore delinquent on filing their required LM-21s for 2024. We are concerned that these persuader organizations and individuals may not file their required 2024 LM-21 reports at all.
  - Furthermore, the eight following organizations or individuals in this group have *never* filed an LM-21 *ever*, even though they've been demonstrably active.
    - [DG&Associates](#) (LM-20 filed by CEO Douglas R Grima)
    - [Libra Management Consulting Inc](#) (LM-20 filed by Officer Alejandro Rique-Gamboa)
    - [Alejandro Rique-Gamboa](#) (LM-20 filed by Alejandro Rique-Gamboa as a self-employed individual)
    - [Culture Built LLC](#) (LM-20 filed by President Luis A Alvarez)
    - [LKLS Consulting](#) (LM-20 filed by KV Information CEO Karen Velasco names LKLS Consulting as the organizational affiliate of subcontractor Luis Camarena)
    - [Daniel Barrett](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Barret as a subcontractor affiliated with Bridge Labor Solutions)



- [Ichana Destin](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Destin as a subcontractor affiliated with Bridge Labor Solutions in an)
- [Webs Pierre](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Webs Pierre as a subcontractor affiliated with Bridge Labor Solutions in an)
- The history of chronic non-filing among these nine organizations or individuals is all the more reason to engage in enforcement. We have no reason to believe that these nine will break from their record of non-compliance.
- As Westinghouse faces unfair labor practice charges related to the counter-organizing campaign that these persuaders were involved in, these organizations or individuals must file their 2024 LM-21s in order for workers, NLRB officials and the public to exercise their legal right to learn about the nature of their contracted persuader work at Westinghouse, as well as how much each of these organizations and individuals both received and paid out for persuader activities in 2024.

### **LM-21 deficiency complaint against KV Information**

- LM-21s filed by persuader firms or individuals are supposed to disclose payments that they made to individual persuaders for their services *and also* disclose the specific employer that those persuaders worked on behalf of.
- However, KV Information has not provided [in the 15\(a\)](#) boxes of Section D the names of the employers for whom its individual persuaders conducted persuader activities. (It appears to have instead provided the names of the persuader organizations that the persuaders were affiliated with.) We therefore can see how much KV Information paid these persuaders, *but we can't* see – as the public is entitled to see – which employers these persuaders worked on behalf of. This defeats a major purpose of the LM-21 disclosure.
- In addition, under a new OLMS requirement that applies to LM-21 filings, LM-21s are supposed to include the [Employer Identification Numbers \(EINs\)](#) of the filing persuading firm or individual, the employers from whom they received payments, and the persuader firms or individuals to which they made payments. This is because cross-matching LM-20s to annual LM-21 persuader reports and LM-10 employer reports to verify employer and persuader reporting compliance has traditionally been difficult because persuaders and employers may provide different names (e.g. a trade name or nickname, rather than a formal name) on different forms. The EIN requirement is meant to solve this problem.



- However, KV Information also has failed to provide Employer Identification Numbers (EINs) for all the employers and individual persuaders listed on its LM-21. Four employer EINs are missing, and 9 persuader EINs are missing.
- KV Information is therefore required to amend its LM-21 to **include the employer names and EIN numbers**.
- We are concerned that KV information, a primary persuader contractor in Westinghouse's anti-union campaign that subcontracted persuader work to several other consultancies and individuals, may not ever correct these deficiencies or may not correct them quickly enough for such information to remain relevant.
- This is especially the case given the pending unfair labor practice charges against Westinghouse concern a period in which KV Information persuaders were operating and were allegedly involved in some of the alleged unfair labor practices. Workers, NLRB officials and the public deserve to know how much each consultant who "persuaded" Westinghouse employees to vote against unionization received for this work, *as they are entitled to by law*. Until these deficiencies are corrected, this information will remain concealed in apparent violation of the LMRDA.

#### **Request for Action:**

LaborLab urges the OLMS to investigate this matter promptly. To summarize, we request that the OLMS:

- Ensure that Westinghouse file its delinquent LM-10 disclosing all relevant details.
- Ensure that the following organizations or individuals file their LM-20s for their persuader work for Westinghouse.
  - [Daniel Barrett](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Barret as a subcontractor affiliated with Bridge Labor Solutions)
  - [Ichana Destin](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Destin as a subcontractor affiliated with Bridge Labor Solutions in an)
  - [Webs Pierre](#) (LM-20 filed by Bridge Labor Solutions President Wildine Pierre names Webs Pierre as a subcontractor affiliated with Bridge Labor Solutions in an)
  - [Luis Camarena](#) (LM-20 filed by KV Information CEO Karen Velasco names Camarena as a subcontractor affiliated with LKLS Consulting in an)



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- [Eduardo Padilla](#) (LM-20 filed by Alejandro Rique-Gamboa as a self-employed individual names Padilla as a subcontractor affiliated with Libra Management Consulting)
- Hold accountable the persuaders who filed delinquent LM-20 forms for their work on Westinghouse's counter-organizing campaign: Alejandro Rique-Gamboa ([1](#) and [2](#)), [Wildine Pierre](#), [Luis A Alvarez](#), [Douglas R Grima](#), Sean Lyles ([1](#) and [2](#)), [Daniel Block](#) and [Karen Velasco](#).
- Ensure that the following 12 persuader individuals or organizations file their LM-21s for 2024 (as or through organizations or as self-employed individuals), and for those who have *never* filed an LM-21, to do so for previous years in which they were active as well:
  - [Unboxed LLC](#)
  - [DG&Associates](#)
  - [Libra Management Consulting Inc](#)
  - [Alejandro Rique-Gamboa](#)
  - [Bridge Labor Solutions, LLC](#)
  - [Culture Built LLC](#)
  - [LKLS Consulting](#)
  - [Daniel Barrett](#)
  - [Ichana Destin](#)
  - [Webs Pierre](#)
  - [Luis Camarena](#)
  - [Eduardo Padilla](#)
- Ensure that KV Information amend its LM-21 for 2024 to provide the missing names of employer clients and the missing employer and persuader EINs.

We believe that ensuring transparency and protecting workers' rights are paramount. The lack of disclosure compliance around Westinghouse's anti-union campaign marks an exceptionally egregious denial of those rights and demands immediate corrective action. This is especially the case given the bevy of unfair labor practice charges that Westinghouse faces for engaging in certain alleged activities while using, or through using, the persuader organizations and individuals in question – whose hiring, pay rates and contracted activities remained concealed from workers until after their union election began. We appreciate your time and attention to this matter.

Sincerely,

Bob Funk  
Executive Director of Labor Lab