



The Price of Repression:
Estimating the Costs of Five
Union-Busting Campaigns in
Minnesota's Nursing Home Sector

April, 2026

LaborLab

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About this Report

When healthcare workers try to unionize, they rarely see the full picture of the forces mobilized against them. Behind the scenes, an interlocking network of management, consultants, and law firms often coordinates to stop them. LaborLab has calculated the estimated costs of five anti-union campaigns at four nursing homes that recently hired outside firms.

These campaigns, spanning 2022 to 2025, illustrate how employers use varying combinations of different professionals and tactics to counter organizing drives. Some rely exclusively on attorneys, with one facility investing heavily in an expensive legal strategy to challenge the bargaining unit. Others use a mix of attorneys (often acting as both legal representatives and campaign consultants) and non-attorney consultants. Within this group, some consultants engaged in direct persuasion (activity requiring LM-20 filings), while others engaged exclusively in “indirect” persuasion and behind-the-scenes coordination that is currently interpreted as exempt from reporting. In one instance, a consultant was hired following a campaign to prevent a subsequent organizing drive from gaining enough momentum to file for an election.

All five campaigns reveal that government-funded employers often resist union organizing at great expense rather than choosing the high-road approach: voluntarily recognizing a union upon proof of majority support.

Our analysis suggests that the cost of these anti-union campaigns was equivalent to anywhere between a **3.8% and 20% wage increase (\$1,400 to \$7,300 per worker)** for targeted workers, depending on the campaign (based on an average wage of \$20/hour and a 35-hour work week). This indicates that several employers might have actually saved money, at least in the medium term, by choosing to negotiate a first contract rather than fighting the union's formation.

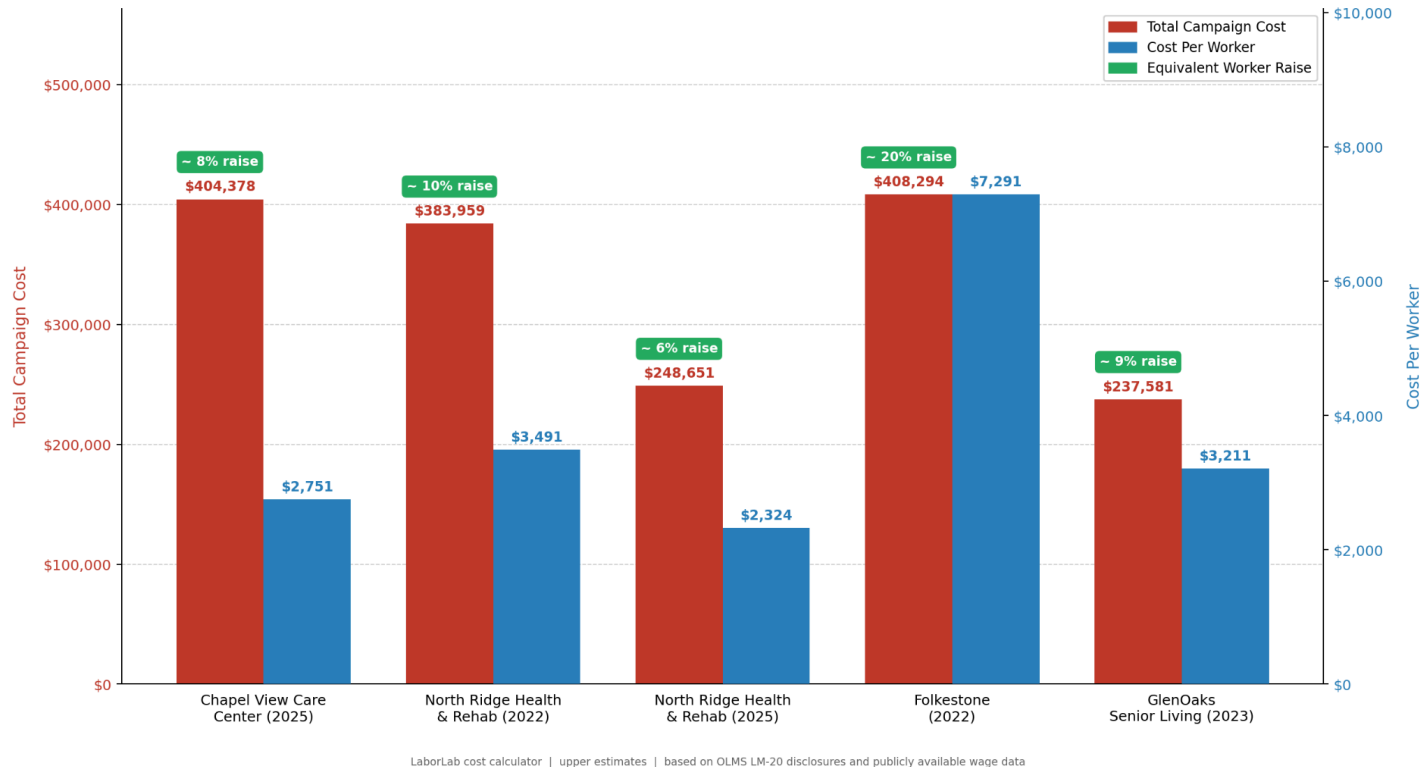
Instead, they chose to expend considerable resources seeking to prevent their workers from organizing for better working conditions, using tactics that are mostly illegal in all other wealthy countries – sometimes even in alleged violation of U.S. law, and always at the risk of doing damage to employee relations, morale and patient care.

LaborLab’s estimates are broken into external costs and internal costs. External costs include spending on consultants, attorneys and materials and administrative fees, with hourly rates based on LM-20, LM-10s reports or typical rates. Internal costs include the cost of paid time spent on anti-union activities by managers leading the employer’s campaign, the cost of paid time spent by other supervisors on anti-union activities, the cost of the paid time of workers lost to anti-union activities (e.g. group meetings and one-on-ones) and the cost of productivity losses.

Hourly rates, hours billed by consultants and attorneys and assumptions about time lost to anti-union activities are based on typical rates, anti-union campaign manuals, methods used by past researchers to estimate the cost of anti-union

campaigns, LaborLab’s domain knowledge and information provided by SEIU Healthcare Minnesota and Iowa.

Anti-Union Campaign Cost Summary



Chapel View Homes (2025)

Campaign background and cost

Chapel View Homes hired [two anti-union consultants](#) on [October 25, 2025](#) to counter an organizing drive by SEIU Healthcare Minnesota & Iowa.¹ It reported paying [\\$125,342](#) for this work.² The employer also hired at least two outside attorneys to provide legal

¹ LM-20s filed by Government Resources Consultants of America (GRCA) indicate Dawn Chapman (D&G Creative Consulting) and Michael McNally, senior consultant at Modern Management (a sister organization of GRCA), union-busted at Chapel View as subcontractors

<https://olmsapps.dol.gov/query/orgReport.do?rptId=925379&rptForm=LM20Form>

² LM-10 filed by Augustana Chapel View Homes

<https://olmsapps.dol.gov/query/orgReport.do?rptId=940032&rptForm=LM10Form>

representation (and, potentially, campaign advice as well). The union [filed an election petition](#) on November 13, 2025 and workers voted 59–50 (out of 147 eligible voters) in favor of unionization on December 12, 2025. The union was certified on December 30, 2025.³

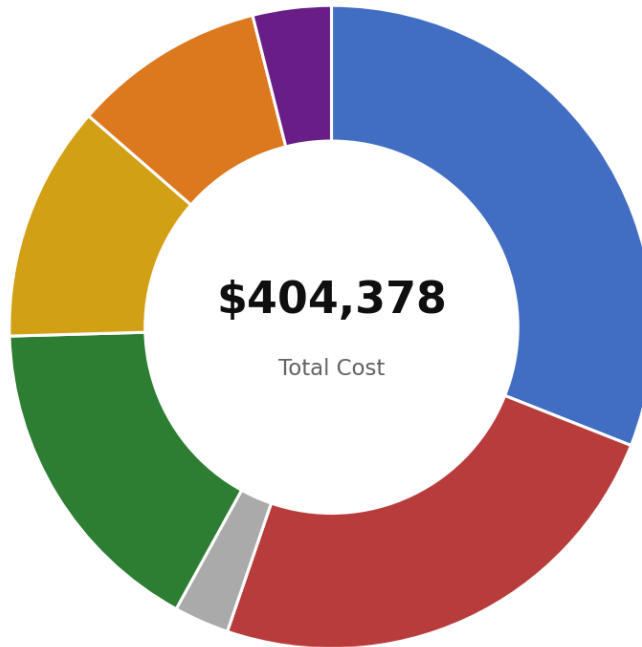
LaborLab’s upper estimate for the cost of Chapel View Homes’s anti-union campaign is about **\$404,000**, split between about \$235,000 in external costs (consultants and attorneys) and \$170,000 in internal costs (paid time of supervisors and workers eaten up by anti-union activities and productivity losses).

The total cost per worker for the upper estimate was about **\$2,800**. That is equivalent to an average wage increase of **7.7 percent** for workers in the bargaining unit if they earned an average wage of \$36,400 per year (\$20 an hour) – a decent outcome for a first contract.

LaborLab’s lower estimate is \$280,000, split between \$162,000 in external costs and \$118,000 in internal costs, at a cost of about \$1,900 per worker. That’s equivalent to a 5.2 percent wage increase for the average worker if they earned \$20 an hour and worked 35 hours per week.

³ NLRB case docket indicates Christopher Chantry (Larkin Hoffman) and Joseph Nierenberg (Nierenberg Employment Law) provided legal representation to Chapel View (and may have provided campaign consulting as well) <https://www.nlr.gov/case/18-RC-374773>

Chapel View



- Non-Attorney Consultants \$125,342 (31.0%)
- Attorneys \$98,057 (24.2%)
- Fees & Materials \$11,170 (2.8%)
- Campaign Team \$66,924 (16.5%)
- Productivity Loss \$47,912 (11.8%)
- Worker Time Lost \$39,039 (9.7%)
- Supervisor Time Lost \$15,934 (3.9%)

COST PER WORKER
\$2,751

LaborLab cost calculator · based on OLMS LM-20 disclosures and publicly available wage data

Consultant and attorney backgrounds

Consultants. Dawn Chapman is a co-owner of the Florida-based D&G Creative Solutions. A veteran of anti-union campaigns for Amazon, 3M, and Becton Dickinson, Chapman frequently operates as a subcontractor for Government Resources of America (GRCA). Her firm appears to be in ongoing violation of the Labor-Management Reporting and Disclosure Act (LMRDA): D&G has habitually failed to disclose pay rates on LM-20 forms and has not filed a required annual LM-21 report since 2022.

Michael McNally, a senior consultant at Modern Management, also worked on the Chapel View campaign. McNally – who has also union-busted at Amazon via GRCA – has yet to file an LM-20 for his work at Chapel View and has never filed an annual LM-21. These omissions appear to constitute violations of the LMRDA.

Notably, Modern Management appears to be a sister company of GRCA, the primary consultancy that subcontracted both Chapman and McNally for the Chapel View Homes campaign.

Attorneys. [Christopher Chantry](#), the former general counsel of a construction union, is an attorney with Minneapolis-based Larkin Hoffman – whose services include [advising](#) employers on “how to remain non-union.” Larkin Hoffman has recently represented employers in NLRB representation cases including Cemstone Ready-Mix, The First District Association, Little Joy Coffee and Walker Methodist Healthcare.

Joseph Nierenberg is an attorney at Minneapolis-based Nierenberg Employment Law who [touts a network of partner consultants](#) “who have expertise other than law,” including industrial psychology and employee coaching. He works “[with management on union organizing campaigns](#).” In recent NLRB representation and unfair labor practice cases, he has also represented Park View Care Center, Stilheart Distillery & Cocktail Lounge, Lawless Distilling Company, Northstar Fire Protection and Pro Vision Staffing Group.⁴

⁴ Contact LaborLab for records of past attorney and consultant clients. Records were obtained through LaborLab’s Early Warning System (EWS) and a custom-designed search query of NLRB filings. These records were originally sourced through the Department of Labor’s Office of Labor Management Standards’ [Online Public Disclosure Room](#) and [NLRB.gov](#).

North Ridge Health and Rehab (2022)

Campaign background and cost

North Ridge Health and Rehab [hired two consultants](#) through LRI Consulting at a [reported cost](#) of \$188,759 with an agreement start date of August 29, 2022 to counter an organizing drive by SEIU Healthcare Minnesota & Iowa.⁵ The employer also hired at least one outside attorney to provide legal representation (and, potentially, campaign advice as well).⁶ The union filed an [election petition](#) on September 9, 2026 (nearly two weeks after the consultants had been hired). An election was scheduled for October 13 (with 110 workers eligible to vote), but the union withdrew the election petition on October 11, potentially indicating a loss of support. Before the petition withdrawal, the union [filed an unfair labor practice](#) complaint alleging that the employer had engaged in illegal coercive activities.⁷

LaborLab's upper estimate for the cost of North Ridge Health and Rehab's anti-union campaign is about **\$384,000** split between about \$264,000 in external costs and about \$120,000 in internal costs (paid time of supervisors and workers eaten up by anti-union activities and productivity loss).

The average cost per worker for the upper estimate was about **\$3,500**. That's equal to a **9.6 percent raise** if the average bargaining unit member earned \$20 an hour and worked 35 hours per week – a good outcome for a first contract.

LaborLab's lower estimate is about \$306,000, split between \$225,000 in external costs and \$81,000 in internal costs.⁸

The average cost per worker for the lower estimate was about \$2,800 – equal to a 7.7 percent wage increase if the average bargaining unit member earned \$20 an hour and worked 35 hours per week – a decent outcome for a first contract.

⁵LM-10 filed by North Ridge Health and Rehab:

<https://olmsapps.dol.gov/query/orgReport.do?rptId=870709&rptForm=LM10Form>

LM-20 filed by LRI Consulting

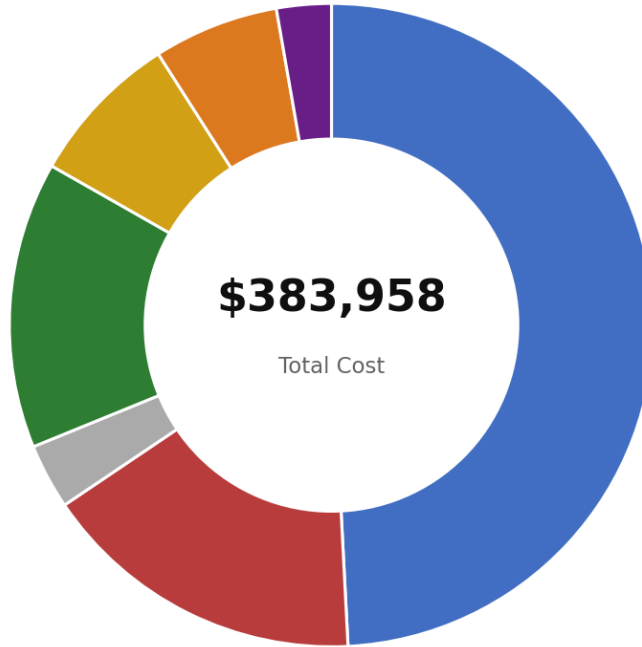
<https://olmsapps.dol.gov/query/orgReport.do?rptId=845278&rptForm=LM20Form>

⁶ NLRB Case docket indicates Ross Gardner provided legal representation to North Ridge Health and Rehab <https://www.nlr.gov/case/18-RC-302842>

⁷ NLRB case docket indicates Ross Gardner (Jackson Lewis) was a legal representative for North Ridge Health in an unfair labor practice case brought during the campaign, in addition to handling North Ridge's representation case <https://www.nlr.gov/case/18-CA-303561>

⁸ See LaborLab's adjusted assumptions for this case

North Ridge Health (2022)



- Non-Attorney Consultants \$188,839 (49.2%)
- Attorneys \$62,849 (16.4%)
- Fees & Materials \$12,584 (3.3%)
- Campaign Team \$55,341 (14.4%)
- Productivity Loss \$29,647 (7.7%)
- Worker Time Lost \$24,157 (6.3%)
- Supervisor Time Lost \$10,541 (2.7%)

COST PER WORKER
\$3,491

LaborLab cost calculator · based on OLMS LM-20 disclosures and publicly available wage data

Consultant and attorney backgrounds

Consultants. Byron Clay and A. Danine Clay are affiliated with BJC & Associates, which was founded by Byron in 2006. The firm has recently worked on anti-union campaigns that have resulted in unfair labor practice charges and high-profile allegations of aggressive union-busting at [Cayuga Health System](#), [BlueOval SK](#) (a joint venture between Ford and SK On) and [Mercedes-Benz](#) facilities. The two union-busted at North Ridge Health as subcontractors for LRI Consulting, perhaps the most notorious anti-union consulting firm. LRI Consulting was named in a number of NLRB cases when Clay previously worked directly for LRI (from 2007 to 2017).

Attorneys. Ross Gardner is an attorney at the Omaha, Nebraska-based office of Jackson Lewis, one of the largest and most notorious anti-union law firms. He has purportedly worked on “[more than 100 union organizing campaigns](#).” Gardner represented Cemex Construction in an NLRB case in which the employer was found to have committed over 20 unfair labor practices. Another Jackson Lewis attorney was a member of the “steering committee” that oversaw the anti-union campaign at Cemex. The case led the NLRB to overturn precedent and make it easier for workers to unionize by providing proof of majority support. Gardner has recently represented employers from around the country including Rocky Mountain Gas, Performance Food Services, United Road Services, Core-Mark International and Zenith Logistics.

North Ridge Health and Rehab (2025)

Campaign background and cost

No LM-20 filings indicate that North Ridge Health and Rehab hired non-attorney consultants to counter a second unionization attempt in 2025 after a previous failed effort (see above). But the employer did hire at least two attorneys with the same law firm, Jackson Lewis (and the use of non-attorney consultants could potentially have gone unreported, such as if they worked exclusively behind the scenes). SEIU Healthcare Minnesota and Iowa [filed an election petition](#) February 12, 2025, and an election was ultimately scheduled for March 20, 2026, with 107 workers eligible to vote. The union filed a blocking charge amid an aggressive anti-union campaign and the election was postponed indefinitely. The union also filed an [unfair labor practice complaint](#) alleging illegal discharge, interrogation and other coercive activities. The case remains open.

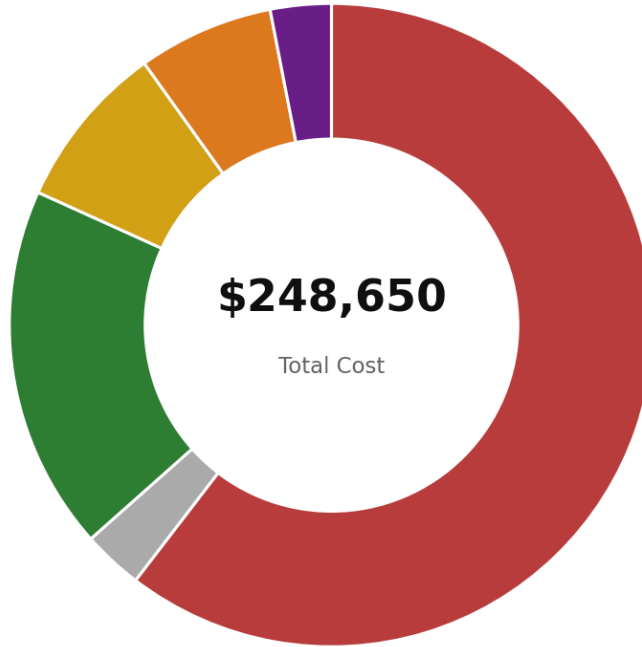
Assuming North Ridge relied exclusively on Jackson Lewis attorneys to assist with its anti-union campaign, LaborLab's upper estimate of the cost of North Ridge Health and Rehab's anti-union campaign is about **\$249,000** in total costs, split between \$158,000 on external costs and \$91,000 in internal costs.

The average cost per worker for the upper estimate is about **\$2,300**. That's equivalent to a **6.3 percent wage increase** (based on our previous assumptions) – a decent outcome for a first contract.

LaborLab's lower estimate of total costs was \$154,000, or about \$1,400 per worker. That's equivalent to a 3.8 percent wage increase (based on our assumptions).

These estimates are rougher than our others because it is more difficult to estimate the number of hours the Jackson Lewis attorneys spent on the campaign. LaborLab will also note that the cost of the campaign could easily have doubled if North Ridge Health used non-attorney consultants – as it did during the first unionization attempt. Consultants frequently fail to meet their reporting requirements or engage exclusively in behind-the-scenes consulting that is [exempt from reporting](#) under the controversial "advice" loophole. Furthermore, because this case is still being litigated, the attorneys may have billed many more hours since the initial campaign ended. This would have significantly raised total spending related to the campaign.

North Ridge Health (2025)



LaborLab cost calculator · based on OLMS LM-20 disclosures and publicly available wage data

Consultant and attorney backgrounds

Consultants. None

Attorneys. [Chad Richter](#) is a member of Jackson Lewis’s board of directors and is based out of the firm’s office in Omaha, Nebraska. He provides “preventive counseling and training” and “assists organizations during labor organizing campaigns.” He has also provided hundreds of management seminars educating supervisors and executives. He has recently represented employers in NLRB representation cases including AZZ Precoat Metals, Tann Electric, ECM Transport, GCC Concrete, H&S Enterprises and Ardent Mills.

[Eryn Perry](#) is a Jackson Lewis associate attorney, also based in the firm’s Omaha, Nebraska office. He provides “preventive day-to-day advice and counseling to management on labor and employment matters.” He has recently represented employers in NLRB representation cases including Charleston Healthcare Center, Zenith Logistics, Phaze One Electric, Tann Electric, Performance Food Group, Bruegger’s Enterprises and ECM Transport.

Note: Attorneys often act as campaign consultants, not just legal representatives, and presumably did so extensively in this case.

Folkestone/Wayzata Bay Senior Housing, Presbyterian Homes and Services (2022)

Campaign background and cost

No LM-20 filings indicate that Folkestone/Wayzata Bay Senior Housing, Presbyterian Homes and Services hired non-attorney consultants to counter a union drive in which SEIU Healthcare Minnesota and Iowa [filed an election petition on March 31, 2022](#). But the firm spent heavily on three attorneys with Felhaber Larson. Further, an [LM-20 filing indicates](#) Presbyterian Homes and Services hired two anti-union consultants with The Labor Pros at a [cost of \\$211,485](#) to supply “information concerning the activities of employees or a labor organization in connection with a labor dispute” from September 25 to October 31.⁹ This raises the question of whether Presbyterian Homes and Services used The Labor Pros earlier in the year to counter the Folkestone organizing drive. Such work may have gone unreported either due to

⁹ LM-20 filed by The Labor Pros.

<https://olmsapps.dol.gov/query/orgReport.do?rptId=849522&rptForm=LM20Form>

LM-21 filed by The Labor Pros.

<https://olmsapps.dol.gov/query/orgReport.do?rptId=866317&rptForm=LM21Form>

non-compliance or because it involved behind-the-scenes activities – such as strategic coordination – that current LMRDA interpretations do not require consultants to disclose.

Alongside its anti-union campaign, the employer delayed the scheduling of an election by two and a half months by using the three attorneys to challenge the bargaining unit – a very expensive legal tactic.¹⁰ Following an NLRB decision that rejected Folkestone’s challenge to the bargaining unit, an election was scheduled on June 8, 2022 for June 28, 2022. With 56 workers eligible to vote, 46 workers voted 36-10 against unionization, with 2 ballots challenged.

Assuming Folkestone relied exclusively on Felhaber Larson attorneys, LaborLab’s upper estimate for the total campaign cost is approximately **\$408,000**. This figure, driven by a campaign that lasted significantly longer than others in this report, breaks down into \$264,000 in external legal fees and \$144,000 in internal costs.

The total cost per worker for the upper estimate was about **\$7,300**. That’s equivalent to a **20 percent raise** (based on our previous assumptions) – a very good contract outcome.

LaborLab’s lower estimate for the campaign was about \$208,000, or \$3,700 per worker. That’s equivalent to a 10 percent wage increase (based on our previous assumptions) – a good contract outcome.

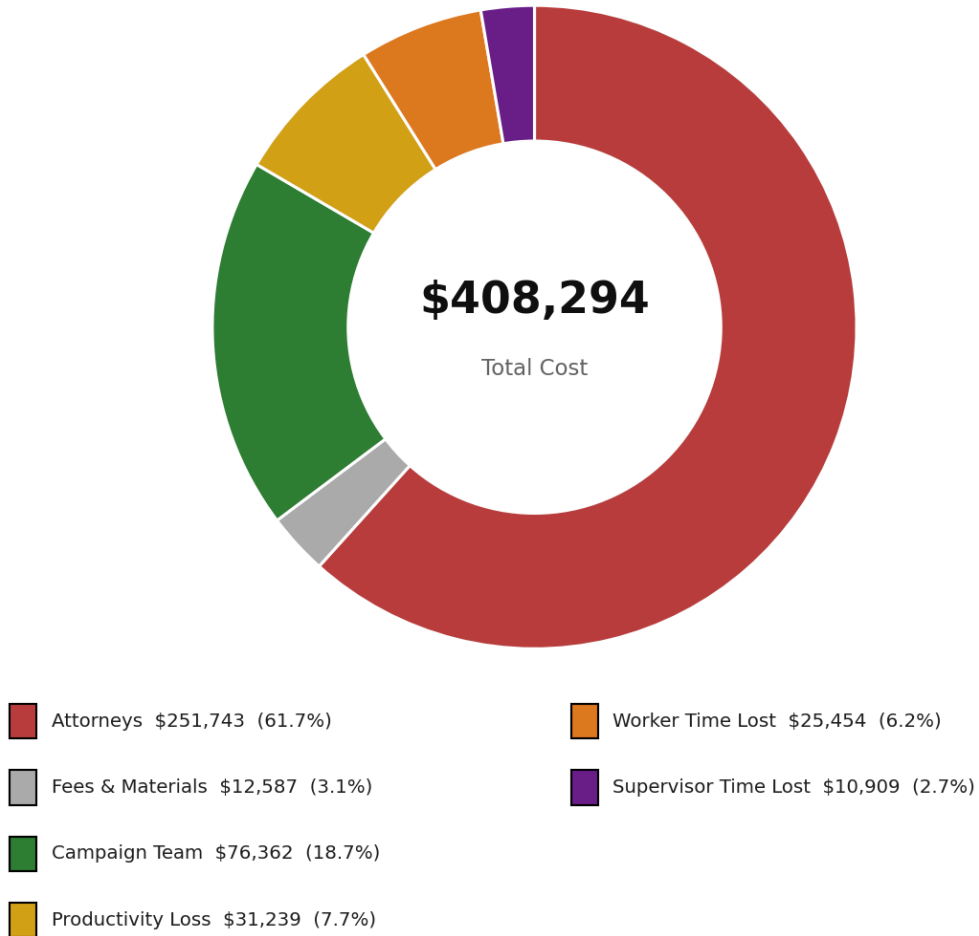
These estimates are rougher than some others because it is more difficult to estimate the number of hours that the Felhaber Larson attorneys spent on the campaign. But the fact that they challenged SEIU Minnesota and Iowa’s proposed bargaining unit and that they appear to have assisted the campaign without non-attorney consultants (assuming no consultant activity went unreported) suggests they billed a high number of hours.¹¹

If Presbyterian Homes and Services’ spending of [\\$211,485](#) on The Labor Pros later in the year is taken into account, then the employer may have spent well over \$600,000 on union-busting in 2022.

¹⁰ One non-attorney consultant has cautioned against challenging a bargaining unit because it “can be extremely expensive.” Codd, Mark. 2020. *Voice of the Employer: A Mixed-Methods Study of Winning Messages for NLRB Elections*. PhD. dissertation, Nova Southeastern University. Davie/Ford Lauderdale, FL, p.

¹¹ See LaborLab’s adjusted assumptions for this case in the appendix.

Folkestone (2022)



COST PER WORKER
\$7,291

LaborLab cost calculator · based on OLMS LM-20 disclosures and publicly available wage data

Consultants and attorney backgrounds

Attorneys. David Richie, and Grant Collins and Paul Zech are attorneys at Minneapolis-based Felhaber Larson. [Larson's labor practice](#) has purportedly expanded nationwide because of its deep expertise in the field. It claims to guide clients and respond to representation campaigns and "litigated representation proceedings," as well as advise them on communication strategies with employees and the public. Felhaber Larson has recently represented employers in representation cases including Pan-O-Gold Baking Co, Essentia Health, Ever-Green Energy, St. Luke's Hospital of Duluth, Range Regional Health Services and Face to Face Health and Counseling Services.

[Grant Collins](#) has purportedly defended Amazon against a charge of illegal discrimination against a union activist and "defeat[ed]" a representation petition by challenging the proposed bargaining unit at a healthcare employer. He did so by successfully arguing that the unit would need to be expanded to include all technical employees. He has also represented a plumbing company that was found to have threatened workers "with unspecified reprisals," compared unionizing to "stabbing [the owner] in the back," and discriminated against a union-supporter in hiring.

[Paul Zech is a former president](#) of Felhaber Larson and claims 35 years of experience in labor law representation. His profile states that he's negotiated dozens of union contracts over the past three years. In 2004, [Zech represented several Minnesota hospitals](#) that were found to have discriminated against striking nurses who sought temporary employment while they were striking a separate hospital system.

[David Richie](#) touts a "proactive approach" to his labor practice and claims particularly strong experience with residential care facilities and hospitals.

Consultants (used after the Folkestone campaign ended).

Yashira Ramos was a subcontractor for The Labor Pros, the anti-union consultancy that Presbyterian Healthcare Services contracted to provide persuader services a few months after the Folkestone campaign ended. Based in Inverness, FL as of 2024, she has also union-busted for Tri Family DBA Hand, Stone Massage, HamHed and a range of other employers.

Luis Alveraz is president of Culture Built and was based in Hollywood, FL as of spring 2025. He union-busted at [Westinghouse Energy](#) in an exceptionally aggressive counter-organizing campaign that was rife with alleged unfair labor practices and

suggests a wide range of violations of the LMRDA. He also union-busted at the Rockefeller Center with his real name misrepresented to workers. He reportedly claimed he was a neutral educator but allegedly targeted workers “based upon their real or perceived immigration status,” with the union [charging the employer with a range of unfair labor practices](#). Alveraz has also union-busted at employers including Parasec and Sixt Rent A Car. He appears to have failed to file his required LM-21 report for 2024.

The Labor Pros, the firm that used the two subcontractors mentioned above, is headed by Nekeya Nunn, an internet personality who calls herself [The Savage Spiritualist](#). The Labor Pros [reportedly](#) “conducts diversity training adjacent to interventions to remove the ‘union threat.’” Nunn reportedly uses “terminology from left-wing, activist spaces” and has said that if DEI initiatives are an anti-union tactic, “then so be it.”

GlenOaks Senior Living (2023)

Campaign background and cost

No LM-20 filings indicate that GlenOaks Senior Living hired consultants to engage in *reportable persuader activities* to counter a union drive in which SEIU Healthcare Minnesota and Iowa filed an [election petition on July 24, 2023](#). But the NLRB case docket suggests the employer did hire two consultants as *non-attorney* legal representatives whose firm also provides the full range of anti-union campaign services, including persuader services (suggesting that these two individuals played a robust consulting role).¹² In addition to using these non-attorney consultants as legal representatives, the employer also hired at least one licensed attorney for representation. Three weeks elapsed between when the election petition was filed and when the bargaining unit was agreed to on August 14 – a possible indication that the employer expended above-average effort trying to negotiate a different bargaining unit than what GlenOaks had proposed (while stopping short of formally challenging the unit). An election was then scheduled for August 31. With 74 workers eligible to vote, 49 voted 29-20 against unionization.

¹² Bud Burdzinski and Cyndi Sauter run Burdzinski & Partners, an anti-union consultancy based in Midland, Michigan. The NLRB case docket for this case indicates that GlenOaks hired the two as legal representatives. <https://www.nlr.gov/case/18-RC-322414>

LaborLab's upper estimate of the cost of GlenOaks' anti-union campaign is about **\$238,000**, split between \$168,000 in external costs and about \$70,000 in internal costs.¹³

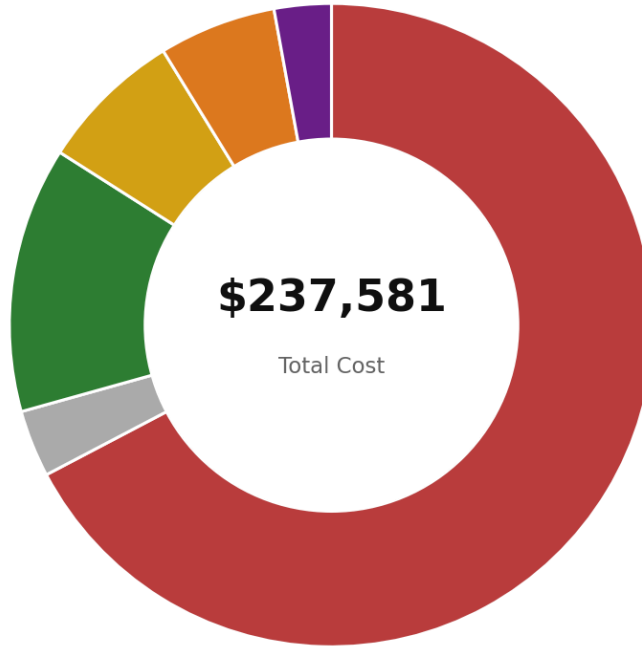
The total cost per worker for the upper estimate is about **\$3,200**. That's equivalent to an **8.8 percent** average raise for the workers in the bargaining unit (based on our previous assumptions) – a good outcome for a first contract.

LaborLab's lower estimate for the total cost of the anti-union campaign was \$139,000, split between \$97,000 in external costs and \$42,000 in internal costs.

The total cost per worker for the lower estimate is about \$1,900. That's equivalent to a 5.2 percent wage increase per worker.

¹³ See LaborLab's adjusted assumptions for this case in the appendix.

GlenOaks Senior Living



LaborLab cost calculator - based on OLMS LM-20 disclosures and publicly available wage data

Consultant and attorney backgrounds

Consultants. Bud Burdzinski and Cyndi Sauter run Burdzinski & Partners, an anti-union consultancy based in Midland, Michigan. As part of its elections service offering, Burdzinski & Partners [promises](#) to provide “employee education” that “cuts through the [union] organizer’s attempt to manipulate voters.” In 2006, the Ohio State Supreme Court ruled that Burdzinski had engaged in the unauthorized practice of law and prohibited him from drafting contractual agreements in the state. Burdzinski’s election-related services include information gathering on workers, strategy development, coaching, elimination of problems, information dissemination and election arrangements.¹⁴

Attorneys. John “Jack” Sullivan is a partner at Dorsey & Whitney LP, a Minneapolis-based global law firm, and leader of its Labor and Employment practice, which advertises “union avoidance” as a service. Sullivan advises employers on [“responding to unionization,”](#) and [claims](#) experience including defending employers against discrimination and retaliation accusations, a Family and Medical Leave Act (FMLA) claim and whistleblower claims. Sullivan has recently represented employers in representation cases spread across California, Washington and Minnesota, including Yakama Power, Faick Salem, Northwest Center, Deep Roots Piercing and Fine Jewelry and Care Ambulance.

Appendix A: Default Assumptions For Estimates

Default Assumptions for Upper Estimate When Consultants And Attorneys Are Used

Duration of campaign

- Duration of time occupied with (or lost to) campaign of non-attorney consultants, attorneys, in-house campaign team, other supervisors and targeted workers runs from reported LM-20 start date (if a consultant is hired and files an LM-20) or the day an election petition is filed (if no LM-20 has been filed) to the day of the union election. Discretion is reserved for selection of the end date if the petition is withdrawn

Cost of non-attorney consultants

- Spending reported in LM-10s (by employers) or LM-21s (by consultants) are used

¹⁴ Contact LaborLab for relevant court records.

Cost of third-party attorneys (who often also serve as campaign consultants, not just legal representatives)

- In cases with one attorney, the attorney charged \$600 an hour, worked 15 hours a week, made one \$500 roundtrip to the employer for a five-day on-site visit, and during that time, expensed \$270 per day in travel costs (\$70 per diem plus \$200 for lodging and rental car), unless they were based locally, in which case no travel expenses are assumed.¹⁵
- In cases with two or more attorneys, the same assumptions hold, except each attorney is assumed to bill 10 hours a week (rather than 15).

Cost of administrative fees and materials

- Administrative fees and materials (e.g. anti-union flyers, websites, letters, videos, etc.) are equal to five percent of the total cost of third-party consultants and attorneys

Cost of Paid Time of In-House Campaign Team

- In-house campaign team leaders – which often include HR managers – earned \$78 per hour in compensation (\$60 an hour plus a 30 percent fringe rate for benefits) and worked seven hours a day on the campaign for five days a week¹⁶
- The number of assumed campaign team members is: campaign team leader for up to 50 workers; 2 for between 51 and 100 workers; and 3 for 101 or more.

Cost of paid supervisor time

¹⁵ This is conservative for an upper estimate. Court records in possession of LaborLab show two attorneys at Jackson Lewis – the firm used in two anti-union campaigns covered here – billed \$730 and \$609 per hour in 2022. Meanwhile, Littler Mendelson, perhaps Jackson Lewis' biggest competitor, claimed its partners billed as much as \$1,750 an hour in a 2025 engagement letter with a city where the firm agreed to charge "discounted rates" of \$550 an hour. Source: Dayen, David. 2025. "Anti-Union Law Firm Tells Clients To Go Ahead With Illegal Union-Busting Tactic." The American Prospect. Last accessed March 2, 2026:

<https://prospect.org/2025/09/01/2025-09-01-anti-union-law-firm-illegal-captive-audience-littler-mendelson-rhode-island/>

¹⁶ Imberman 1975 found in a survey that the typical supervisor spent an average of 10 hours a week (equal to two hours per weekday) on anti-union campaigns, while human resources specialists spent "at least" twice as much, and in some cases, full time. Wilson 1997 stated "... the campaign will be a full-time job for the entire campaign period [for the campaign team]" Sources: Imberman, Woodruff. 1975. "How expensive is an NLRB Election?" MSU Business Topics. 23(3):13-18

<https://laborlab.us/wp-content/uploads/2025/08/Lewis-et-al.-of-Business-Administration.pdf>; Wilson, Donald. 1997. *Total Victory: The Complete Management Guide to a Successful NLRB Representation Election*. Labor Relations Institute: Broken Arrow, OK

- Supervisors spent 1.5 hours a day on the campaign, working five days a week earning average compensation of \$52 an hour (\$40 an hour plus 30 percent fringe rate for benefits)
- The number of assumed supervisors was based on a ratio of one supervisor for every 30 employees.

Cost of paid employee time

- Number of workers targeted by campaign is equal to the number of workers in the bargaining unit
- Workers spent 15 minutes a day preoccupied by anti-union campaign activities (e.g. paid time spent in anti-union group meetings or one-on-one conversations) earning total compensation of \$26 an hour (\$20 an hour plus 30 percent fringe rate for benefits)¹⁷

Cost of productivity loss

- Workers are assumed to spend 6.75 hours a day working (7 hours of paid time minus 15 minutes of time lost entirely to anti-union activities) earning average compensation of \$26 an hour.
- Calculated by multiplying average productivity loss of 5 percent by 6.75 hours a day by \$26 an hour by five days a week.¹⁸

Some costs inflated by 10 percent

¹⁷ Anti-union manuals often recommend holding at least one group meeting per week and stress the importance of having supervisors express union opposition directly to workers and to regularly rate and report back on their union support. Imberman 1975 found the average campaign had at least three anti-union speeches, but the intensity of campaigns is widely understood to have increased since then. See, for example, Wilson 1997, Lafer 2007, Bronfenbrenner 2011 and Moody 2014. Furthermore, anti-union workers are often allowed paid time to campaign against the union on working time, with one-third to one-half of employers reported to help support “Vote No” committees and offered perks or bribes (Lafer 2007:38). Sources:; Imberman, Woodruff. 1975. “How expensive is an NLRB Election?” *MSU Business Topics*. 23(3):13-18; Lafer, Gordon. 2007. “Neither Free Nor Fair: The Subversion of Democracy Under National Labor Relations Board Elections.” *An American Rights at Work Report*; Wilson, Donald. 1997. *Total Victory: The Complete Management Guide to a Successful NLRB Representation Election*. Labor Relations Institute: Broken Arrow, OK; Moody, Kim. 2014. “Beating the Union: Union Avoidance in the United States 1945 to the Present” in *In Solidarity: Essays on Working-Class Organization in the United States*. Haymarket Books: Chicago, IL. Bronfenbrenner, Kate. 2009. “No Holds Barred: The Intensification of Employer Resistance. Economic Policy Institute and American Rights at Work Education Fund.

¹⁸ This assumed productivity loss rate is conservative for a high-end estimate. Imberman 1975 found an average productivity loss of 8 percent. Furthermore, the productivity due to an anti-union campaign could be as high as 15 percent in occupations that involved a “great deal of hand labor.” This would seem to typically be the case for nursing home workers.

- For its upper estimate, LaborLab inflated by 10 percent the estimated attorney costs, consultant and attorney travel costs, and the cost of the lost paid time of the campaign team, other supervisors and workers.

Default Assumptions For Lower Estimate When Consultants And Attorneys Are Used

Same assumptions as upper estimate except

- The average hourly rate charged by attorneys was lowered to \$500 an hour from \$600 an hour, and the attorney site visit was lowered to three days from five
- The average number of weekly hours billed by attorneys was lowered to 10 hours a week in cases involving one attorney and to 5 hours a week in cases involving two or more attorneys.
- The fringe rate for materials and administrative fees for consultants and attorneys was lowered to 2 percent from 5 percent
- 1 campaign leader is assumed for between 0 and 100 workers and only 2 for over 100 workers, and their hours worked per day on the campaign was lowered to six from seven.
- 1 supervisor was assumed for every 40 workers, rather than every 30
- Other supervisors spent 1 hour per day on anti-union activities, rather than 1.5
- Travel costs and hourly compensation for in-house campaign team members, other supervisors and workers were all deflated by 10 percent

Default Assumptions For When Only Attorneys Are Used

Same assumptions as above, except:

- For the upper estimate, attorneys are assumed to bill 25 hours per week (rather than our default of 15 for cases with one attorney and 10 for cases with 2 or more when a consultant is also used), in recognition that attorneys likely spend significantly more time providing campaign consulting services (in addition to representation services) than they would if a non-attorney consultant is also being used. (Campaign consultants can sometimes work 40 hours a week or more.)
- For the lower estimate, attorneys are assumed to bill 20 hours per week (rather than our default of 5 when a consultant is also used)

- For the upper estimate, campaign team members are assumed to spend 8 hours a day on the campaign (rather than our default of 7), and for the lower estimate, they are assumed to spend 7 hours a day on the campaign (rather than our default of 6). This is because campaigns that are only coordinated by attorneys are more reliant on in-house supervisors
- For our lower estimate, one in-house campaign leader is assumed for campaigns involving up to 50 workers, two are assumed for campaigns involving up to 100 and three are assumed for those involving 101 or more, also because of the greater reliance on supervisors.

Case-Specific Adjustments To Assumptions

Folkestone (2022)

- The upper estimate assumed the attorneys billed 10 hours a week each (rather than our default assumption of 25 each for campaigns where only attorneys are used), because three attorneys – rather than one or two – were used, and over a much longer time period.

GlenOaks (2023)

- The two legal representatives who are not licensed attorneys and who also provide the full range of consulting services, including persuader services, were assumed to charge \$250 an hour (a discount rate by industry standards), per their past agreements with employers.¹⁹

¹⁹ Engagement letters obtained through the OLMS Online Public Disclosure Room suggest that Burdzinski & Partners was charging \$250 an hour.

See cost calculations on following page

Appendix B: Chapel View Care Center (2025) Estimated Cost Calculations

Anti-Union Campaign Cost Breakdown | Upper Estimate

| EXTERNAL COSTS | | | \$234,569 total |
|--|--|-------|------------------------|
| THIRD-PARTY CONSULTANTS | | | |
| Name | Weekly Cost | Weeks | Total |
| Dawn Chapman and Michael McNally (Government Resources of America) | | 7.43 | \$125,342 |
| TOTAL CONSULTANT COST | | | \$125,342 |
| THIRD-PARTY ATTORNEYS | | | |
| Name | Weekly Cost | Weeks | Total |
| Christopher Chantry (Larkin Hoffman) | \$6,600 <small>\$600/hr × 10 hrs × 1.1 (no travel costs)</small> | 7.43 | \$49,029 |
| Joseph Nierenberg (Nierenberg Employment Law) | \$6,600 <small>\$600/hr × 10 hrs × 1.1 (no travel costs)</small> | 7.43 | \$49,029 |
| TOTAL ATTORNEY COST | | | \$98,057 |
| FEES & MATERIALS — 5% FRINGE | | | |
| Consultant + Attorney Base | | | \$223,399 |
| Materials Cost (5%) | | | \$11,170 |
| INTERNAL COSTS | | | \$169,809 total |
| IN-HOUSE CAMPAIGN TEAM | | | |
| Name | Weekly Cost | Weeks | Total |
| Manager #1 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 7.43 | \$22,308 |
| Manager #2 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 7.43 | \$22,308 |
| Manager #3 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 7.43 | \$22,308 |
| TOTAL CAMPAIGN TEAM COST | | | \$66,924 |
| OTHER SUPERVISORS (5 TOTAL) | | | |
| Name | Weekly Cost | Weeks | Total |
| 5 Supervisors | \$2,145 <small>\$40/hr × 1.5 hrs/day × 1.3 fringe × 5 × 5 days × 1.1</small> | 7.43 | \$15,934 |
| TOTAL SUPERVISOR TIME LOST | | | \$15,934 |
| WORKER TIME LOST — 147 ELIGIBLE VOTERS | | | |
| Name | Weekly Cost | Weeks | Total |
| 147 Workers | \$5,255 <small>\$20/hr × 0.25 hrs/day × 1.3 fringe × 147 workers × 5 days × 1.1</small> | 7.43 | \$39,039 |
| TOTAL WORKER TIME LOST | | | \$39,039 |
| PRODUCTIVITY LOSS — 5% RATE | | | |
| Name | Weekly Cost | Weeks | Total |
| 5% Loss | \$6,450 <small>(7 - 0.25 hrs) × \$20 × 1.3 × 5% × 147 workers × 5 days</small> | 7.43 | \$47,912 |
| TOTAL PRODUCTIVITY LOSS | | | \$47,912 |
| TOTAL ANTI-UNION CAMPAIGN COST (External: \$234,569 Internal: \$169,809 Workers: 147) | | | \$404,378 |

Upper estimate. Figures from LaborLab cost calculator. Based on OLMS LM-20 disclosures and publicly available wage data.

Appendix C: North Ridge Health and Rehab (2022) Estimated Cost Calculations

Anti-Union Campaign Cost Breakdown | Upper Estimate · 2022

| EXTERNAL COSTS | | | \$264,273 total |
|--|--|-------|------------------------|
| THIRD-PARTY CONSULTANTS | | | |
| Name | Weekly Cost | Weeks | Total |
| Byron Clay and (A. Danine Clay(per LM-20 reported total) | | 6.14 | \$188,839 |
| TOTAL CONSULTANT COST | | | \$188,839 |
| THIRD-PARTY ATTORNEYS | | | |
| Name | Weekly Cost | Weeks | Total |
| Ross Gardner (Jackson Lewis) | \$9,900 <small>\$600/hr × 15 hrs × 1.1 + travel costs × 1.1</small> | 6.14 | \$62,849 |
| TOTAL ATTORNEY COST | | | \$62,849 |
| FEES & MATERIALS — 5% FRINGE | | | |
| Consultant + Attorney Base | | | \$251,688 |
| Materials Cost (5%) | | | \$12,584 |
| INTERNAL COSTS | | | \$119,686 total |
| IN-HOUSE CAMPAIGN TEAM | | | |
| Name | Weekly Cost | Weeks | Total |
| Manager #1 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 6.14 | \$18,447 |
| Manager #2 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 6.14 | \$18,447 |
| Manager #3 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 6.14 | \$18,447 |
| TOTAL CAMPAIGN TEAM COST | | | \$55,341 |
| OTHER SUPERVISORS (4 TOTAL) | | | |
| Name | Weekly Cost | Weeks | Total |
| 4 Supervisors | \$1,716 <small>\$40/hr × 1.5 hrs/day × 1.3 fringe × 4 × 5 days × 1.1</small> | 6.14 | \$10,541 |
| TOTAL SUPERVISOR TIME LOST | | | \$10,541 |
| WORKER TIME LOST — 110 ELIGIBLE VOTERS | | | |
| Name | Weekly Cost | Weeks | Total |
| 110 Workers | \$3,933 <small>\$20/hr × 0.25 hrs/day × 1.3 fringe × 110 workers × 5 days × 1.1</small> | 6.14 | \$24,157 |
| TOTAL WORKER TIME LOST | | | \$24,157 |
| PRODUCTIVITY LOSS — 5% RATE | | | |
| Name | Weekly Cost | Weeks | Total |
| 5% Loss | \$4,826 <small>(7 - 0.25 hrs) × \$20 × 1.3 × 5% × 110 workers × 5 days</small> | 6.14 | \$29,647 |
| TOTAL PRODUCTIVITY LOSS | | | \$29,647 |
| TOTAL ANTI-UNION CAMPAIGN COST (External: \$264,273 Internal: \$119,686 Workers: 110) | | | \$383,959 |

Upper estimate. Figures from LaborLab cost calculator. Based on OLMS LM-20 disclosures and publicly available wage data.

Appendix D: North Ridge Health and Rehab (2025) Estimated Cost Calculations

Anti-Union Campaign Cost Breakdown | Upper Estimate · 2025

| EXTERNAL COSTS | | | \$157,724 total |
|---|--|-------|------------------|
| THIRD-PARTY CONSULTANTS | | | |
| Name | Weekly Cost | Weeks | Total |
| No non-attorney consultants retained for this campaign. | | | |
| TOTAL CONSULTANT COST | | | \$0 |
| THIRD-PARTY ATTORNEYS | | | |
| Name | Weekly Cost | Weeks | Total |
| Chad Richter (Jackson Lewis) | \$16,500 <small>\$600/hr × 25 hrs × 1.1 + travel costs × 1.1</small> | 4.43 | \$75,106 |
| Evyn Perry (Jackson Lewis) | \$16,500 <small>\$600/hr × 25 hrs × 1.1 + travel costs × 1.1</small> | 4.43 | \$75,106 |
| TOTAL ATTORNEY COST | | | \$150,213 |
| FEES & MATERIALS — 5% FRINGE | | | |
| Consultant + Attorney Base | | | \$150,213 |
| Materials Cost (5%) | | | \$7,511 |
| INTERNAL COSTS | | | \$90,927 total |
| IN-HOUSE CAMPAIGN TEAM | | | |
| Name | Weekly Cost | Weeks | Total |
| Manager #1 | \$3,432 <small>\$60/hr × 8 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 4.43 | \$15,199 |
| Manager #2 | \$3,432 <small>\$60/hr × 8 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 4.43 | \$15,199 |
| Manager #3 | \$3,432 <small>\$60/hr × 8 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 4.43 | \$15,199 |
| TOTAL CAMPAIGN TEAM COST | | | \$45,597 |
| OTHER SUPERVISORS (4 TOTAL) | | | |
| Name | Weekly Cost | Weeks | Total |
| 4 Supervisors | \$1,716 <small>\$40/hr × 1.5 hrs/day × 1.3 fringe × 4 × 5 days × 1.1</small> | 4.43 | \$7,599 |
| TOTAL SUPERVISOR TIME LOST | | | \$7,599 |
| WORKER TIME LOST — 107 ELIGIBLE VOTERS | | | |
| Name | Weekly Cost | Weeks | Total |
| 107 Workers | \$3,825 <small>\$20/hr × 0.25 hrs/day × 1.3 fringe × 107 workers × 5 days × 1.1</small> | 4.43 | \$16,940 |
| TOTAL WORKER TIME LOST | | | \$16,940 |
| PRODUCTIVITY LOSS — 5% RATE | | | |
| Name | Weekly Cost | Weeks | Total |
| 5% Loss | \$4,695 <small>(7 - 0.25 hrs) × \$20 × 1.3 × 5% × 107 workers × 5 days</small> | 4.43 | \$20,790 |
| TOTAL PRODUCTIVITY LOSS | | | \$20,790 |
| TOTAL ANTI-UNION CAMPAIGN COST (External: \$157,724 Internal: \$90,927 Workers: 107) | | | \$248,651 |

Upper estimate. Figures from LaborLab cost calculator. Based on OLMS LM-20 disclosures and publicly available wage data.

Appendix E: Folkestone/Wayzata Bay Senior Housing, Presbyterian Homes and Services (2022) Estimated Cost Calculations

Anti-Union Campaign Cost Breakdown | Upper Estimate · 2022

| EXTERNAL COSTS | | | \$264,330 total |
|--|---|-------|-----------------|
| THIRD-PARTY CONSULTANTS | | | |
| Name | Weeks | Total | |
| No non-attorney consultants retained for this campaign. | | | |
| TOTAL CONSULTANT COST | | | \$0 |
| THIRD-PARTY ATTORNEYS | | | |
| Name | Weekly Cost | Weeks | Total |
| David Richie (Felhaber Larson) | \$6,600 <small>\$600/hr × 10 hrs × 1.1 (no travel costs)</small> | 12.71 | \$83,914 |
| Grant Collins (Felhaber Larson) | \$6,600 <small>\$600/hr × 10 hrs × 1.1 (no travel costs)</small> | 12.71 | \$83,914 |
| Paul Zech (Felhaber Larson) | \$6,600 <small>\$600/hr × 10 hrs × 1.1 (no travel costs)</small> | 12.71 | \$83,914 |
| TOTAL ATTORNEY COST | | | \$251,743 |
| FEES & MATERIALS — 5% FRINGE | | | |
| Consultant + Attorney Base | | | \$251,743 |
| Materials Cost (5%) | | | \$12,587 |
| INTERNAL COSTS | | | \$143,964 total |
| IN-HOUSE CAMPAIGN TEAM | | | |
| Name | Weekly Cost | Weeks | Total |
| Manager #1 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 12.71 | \$38,181 |
| Manager #2 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 12.71 | \$38,181 |
| TOTAL CAMPAIGN TEAM COST | | | \$76,362 |
| OTHER SUPERVISORS (2 TOTAL) | | | |
| Name | Weekly Cost | Weeks | Total |
| 2 Supervisors | \$858 <small>\$40/hr × 1.5 hrs/day × 1.3 fringe × 2 × 5 days × 1.1</small> | 12.71 | \$10,909 |
| TOTAL SUPERVISOR TIME LOST | | | \$10,909 |
| WORKER TIME LOST — 56 ELIGIBLE VOTERS | | | |
| Name | Weekly Cost | Weeks | Total |
| 56 Workers | \$2,002 <small>\$20/hr × 0.25 hrs/day × 1.3 fringe × 56 workers × 5 days × 1.1</small> | 12.71 | \$25,454 |
| TOTAL WORKER TIME LOST | | | \$25,454 |
| PRODUCTIVITY LOSS — 5% RATE | | | |
| Name | Weekly Cost | Weeks | Total |
| 5% Loss | \$2,457 <small>(7 - 0.25 hrs) × \$20 × 1.3 × 5% × 56 workers × 5 days</small> | 12.71 | \$31,239 |
| TOTAL PRODUCTIVITY LOSS | | | \$31,239 |
| TOTAL ANTI-UNION CAMPAIGN COST (External: \$264,330 Internal: \$143,964 Workers: 56) | | | \$408,294 |

Upper estimate. Figures from LaborLab cost calculator. Based on OLMS LM-20 disclosures and publicly available wage data.

Appendix F: GlenOaks Senior Living (2023) Estimated Cost Calculations

Anti-Union Campaign Cost Breakdown | Upper Estimate · 2023

| EXTERNAL COSTS | | | \$167,888 total |
|--|---|-------|------------------------|
| THIRD-PARTY CONSULTANTS | | | |
| Name | Weeks | Total | |
| No non-attorney consultants retained for this campaign. | | | |
| TOTAL CONSULTANT COST | | | \$0 |
| THIRD-PARTY ATTORNEYS | | | |
| Name | Weekly Cost | Weeks | Total |
| John SullivanDorsey & Whitney | \$16,500 <small>\$600/hr × 25 hrs × 1.1 (no travel costs)</small> | 5.29 | \$87,214 |
| Bud BurdzinskiBurdzinski & Partners | \$6,875 <small>\$250/hr × 25 hrs × 1.1 (no travel costs)</small> | 5.29 | \$36,339 |
| Cyndi SauterBurdzinski & Partners | \$6,875 <small>\$250/hr × 25 hrs × 1.1 (no travel costs)</small> | 5.29 | \$36,339 |
| TOTAL ATTORNEY COST | | | \$159,893 |
| FEES & MATERIALS — 5% FRINGE | | | |
| Consultant + Attorney Base | | | \$159,893 |
| Materials Cost (5%) | | | \$7,995 |
| INTERNAL COSTS | | | \$69,693 total |
| IN-HOUSE CAMPAIGN TEAM | | | |
| Name | Weekly Cost | Weeks | Total |
| Manager #1 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 5.29 | \$15,873 |
| Manager #2 | \$3,003 <small>\$60/hr × 7 hrs/day × 5 days × 1.3 fringe × 1.1</small> | 5.29 | \$15,873 |
| TOTAL CAMPAIGN TEAM COST | | | \$31,746 |
| OTHER SUPERVISORS (3 TOTAL) | | | |
| Name | Weekly Cost | Weeks | Total |
| 3 Supervisors | \$1,287 <small>\$40/hr × 1.5 hrs/day × 1.3 fringe × 3 × 5 days × 1.1</small> | 5.29 | \$6,803 |
| TOTAL SUPERVISOR TIME LOST | | | \$6,803 |
| WORKER TIME LOST — 74 ELIGIBLE VOTERS | | | |
| Name | Weekly Cost | Weeks | Total |
| 74 Workers | \$2,646 <small>\$20/hr × 0.25 hrs/day × 1.3 fringe × 74 workers × 5 days × 1.1</small> | 5.29 | \$13,983 |
| TOTAL WORKER TIME LOST | | | \$13,983 |
| PRODUCTIVITY LOSS — 5% RATE | | | |
| Name | Weekly Cost | Weeks | Total |
| 5% Loss | \$3,247 <small>(7 - 0.25 hrs) × \$20 × 1.3 × 5% × 74 workers × 5 days</small> | 5.29 | \$17,161 |
| TOTAL PRODUCTIVITY LOSS | | | \$17,161 |
| TOTAL ANTI-UNION CAMPAIGN COST External: \$167,888 Internal: \$69,693 Workers: 74 | | | \$237,581 |

Upper estimate. Figures from LaborLab cost calculator. Based on OLMS LM-20 disclosures and publicly available wage data.