



July 31, 2025

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**Submitted Electronically via <http://www.regulations.gov>**

Andrew Davis, Director of the Office of Program Operations  
Office of Labor Management Standards  
U.S. Department of Labor  
200 Constitution Ave. NW, Room N-5609  
Washington, DC 20210

Re: Proposed Rule: Filing Thresholds for Forms LM-2, LM-3, and LM-4 Labor Organization Annual Reports, RIN 1245-AA15

Dear Mr. Davis:

The American Federation of State, County & Municipal Employees (AFSCME) is pleased to submit these comments in response to the above-referenced notice of proposed rulemaking from the Office of Labor-Management Standards (OLMS) raising the filing threshold for Forms LM-2 and LM-3 that labor organizations use to meet their financial reporting requirements under Title II of the Labor Management Reporting and Disclosure Act (LMRDA). 90 Fed. Reg. 28251 (July 1, 2025) (“the NPRM” and “proposed rule,” respectively).

AFSCME supports the proposed rule, as an increase in the LM-2 and LM-3 annual receipts filing threshold is long overdue. However, AFSCME believes that the proposed rule does not go far enough, and that a more substantial increase to the filing thresholds is required to fulfill the LMRDA’s promise of ensuring financial integrity for labor organizations, as described below.

AFSCME is an international labor organization representing around 1.4 million members across more than 3,000 affiliated local unions and councils, in both the public and private sectors. Councils and local unions are autonomous labor organizations, each with their own constitution, offices, employees, and bank accounts. Each is responsible for filing their own financial reports. AFSCME’s affiliates range in size from large councils and locals with thousands, tens of thousands, or over one hundred thousand members, to small local unions representing less than a dozen workers.

To reduce the regulatory burden on small and medium-sized unions, AFSCME strongly supports raising the filing thresholds. The threshold for Form LM-2 has not been raised since 2003, and the threshold for Form LM-3 has not been raised since 1992. Due to substantial

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inflation since then, today even unions with relatively modest annual receipts must file the lengthy Form LM-2 intended for large labor organizations, at significant cost. Moreover, as detailed further below, the filing of an LM-2, which OLMS currently makes available to anyone in the world with internet access, raises significant added costs related to cybersecurity protocols.

Currently, smaller unions with hardly enough annual receipts to cover even a part-time employee are required to file the intermediate LM-3, expending valuable resources that could otherwise support the representation of members. Raising the filing thresholds would alleviate this burden without meaningfully reducing access to unions' financial reports or otherwise undermining the goals of the LMRDA.

While strongly in support of raising the thresholds, AFSCME also urges OLMS to increase the threshold for Form LM-2 beyond the current proposed level so that only labor organizations with more than \$600,000 in annual receipts would be required to file the LM-2 form, which is a vastly more burdensome and complex submission than the LM-3 form. AFSCME believes that this higher threshold is necessary to keep pace with continued inflation in what, based on past experience, will likely be a long interval until the threshold is reevaluated and increased again. AFSCME's proposed threshold would also more closely align with the amount of union resources needed to prepare the detailed LM-2 form in relation to the union's annual receipts, and also account for the additional cost of establishing cybersecurity to protect against cyberattacks to which unions that file LM-2 forms are particularly exposed given the amount and detail of information that OLMS places on the world wide web.

In addition, AFSCME urges OLMS to raise the disaggregation threshold at which LM-2 filers must report itemized payments to vendors. This threshold has been affected by inflation just as the filing thresholds have and is also overdue for an increase. Raising the disaggregation threshold would reduce unions' reporting burden and reduce cybercrime vulnerability for labor organizations and payees.

Finally, and relatedly, AFSCME encourages OLMS to further update its practices regarding the public display of LM-2 forms on its website by ensuring that specific employee names and titles, and specific vendor and payee names, are redacted before publication online. Cybercrime is a threat to everyone, and LM-2 filers are made uniquely vulnerable to phishing, spear phishing, and various other fraudulent cyberattacks because of the availability of this detailed information to domestic and international cybercrime syndicates. Indeed, LM-2 filers must divert substantial resources which are often not available to unions whose receipts are below the LM-2 filing threshold, for protections including cyber-liability insurance, adequate information technology and email systems, and regular retraining for employees to recognize cyberattacks.

**1. Adjustment of the filing thresholds is already overdue, and the threshold should be raised further than currently proposed to keep pace with future inflation.**

An increase in the filing thresholds is long overdue. OLMS has previously indicated that it "will continue its past practice of periodically assessing the appropriateness of the filing threshold to ensure



that it is relevant in terms of the current economy.” 68 Fed. Reg. 58383, 58383 (Oct. 9, 2003). Yet, the filing threshold for Form LM-2 has not been revised since 2003. *Id.* In the 22 years since the LM-2 threshold was last adjusted, inflation has eroded the value of unions’ annual receipts and substantially lowered the effective filing threshold. Today, even relatively modestly sized unions have \$250,000 in annual receipts. OLMS set the threshold for filing the LM-2 at \$250,000 in 2003, which was a \$50,000 increase from the prior level of \$200,000. But a labor organization with \$250,000 in annual receipts in 2025 is the equivalent of a labor organization with only \$145,000 in annual receipts in 2003.<sup>1</sup> This means that the threshold today is effectively only about 60 percent of what it was when last updated. AFSCME agrees that the filing threshold should be increased but also urges OLMS to increase the threshold beyond the proposed \$450,000 to keep pace with inflation going forward, in light of the lengthy periods of time that have historically preceded increases.

The example of the prior 2003 increase is illustrative. Before that increase, LM-2 forms were required of unions with annual receipts of \$200,000. OLMS increased the threshold by \$50,000, to \$250,000, in 2003. By February 2012, inflation had essentially eliminated that increase, and in each year up to the present that increase has fallen further behind.

AFSCME strongly supports raising the threshold to keep pace with inflation, but we urge OLMS to raise the LM-2 threshold to \$600,000, beyond the level currently proposed, in anticipation of future inflation. The NPRM states that matching inflation since 2003 would put the 2025 threshold at \$430,000—but within just a few years inflation will have eroded the threshold again. If the threshold is not raised for another 22 years, the length of the previous interval, it will need to be set to \$750,000 in 2047.<sup>2</sup> Therefore, AFSCME believes it is appropriate to split the difference and set the threshold at \$600,000 now to account for projected inflation through at least the next 11 years.<sup>3</sup> The current proposal includes \$20,000 to account for future inflation, but this allowance will be surpassed within just two years at the current inflation rate. Setting the threshold at \$600,000 now would allow OLMS to take a proactive approach rather than continuing to act well behind inflation. As explained in further detail below, other factors, including the cost of compiling LM-2 forms and the cost of addressing the cybersecurity threats that come with filing LM-2 forms, further support this greater increase in the threshold than a simple inflation adjustment.

Alternatively, AFSCME urges OLMS to adopt an automatic adjustment mechanism that increases the filing thresholds every year to keep pace with inflation. Other government agencies, such as the Social Security Administration and the IRS, use the Consumer Price Index (CPI) from the Bureau of Labor Statistics to estimate inflation rates and annually update payouts or thresholds that they administer. OLMS could adopt a similar approach, automatically adjusting the thresholds for LM reports based on the CPI-U or a similar metric every year. Keeping the threshold on pace with inflation, rather

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<sup>1</sup> This comparison relies on the Bureau of Labor Statistic’s Consumer Price Index Calculator at [https://www.bls.gov/data/inflation\\_calculator.htm](https://www.bls.gov/data/inflation_calculator.htm) to estimate the relative value of \$250,000 in 2025 versus in 2003.

<sup>2</sup> This assumes a future inflation rate of 2.57% (the average inflation rate from 2003-2025) and is calculated using Forbes’ Inflation Calculator for Historical & Future Value, at <https://www.forbes.com/advisor/investing/inflation-calculator/>.

<sup>3</sup> Assuming a future inflation rate of 2.57%, \$250,000 in 2003 will be equivalent to roughly \$565,000 in 2036. *Id.*



than jumping forward in huge strides every few decades, would provide unions with stability and ensure the appropriateness of the filing thresholds going forward. When a union’s receipts rise, going from an LM-3 to an LM-2 filer, their computer systems must be retooled and employees must be retrained to account for the new reporting requirement and new cybersecurity risks. Yet, unions saddled with these new costs often do not see a relative increase in their annual receipts’ buying power, leaving their net revenues lower than before.

AFSCME supports raising the threshold between the LM-3 and the LM-4 for the same reasons. OLMS has not raised the current threshold level of \$10,000 since the LM-4 was created in 1992. This means that today many unions are required to file LM-3 forms if they have annual receipts of as low as or even less than \$12,000—hardly enough to cover the costs of a part-time employee to prepare the form. At OLMS’s estimated cost of \$4,028.33,<sup>4</sup> filing an LM-3 currently consumes over one third of these unions’ annual receipts, which is an unreasonable regulatory burden. OLMS must substantially increase the threshold to account for this.

Raising the threshold for the LM-3 to \$25,000 would ease the regulatory burden of many of these smaller unions. However, the increase does not go far enough, as inflation will overtake even the \$25,000 threshold within five years.<sup>5</sup> OLMS should raise the LM-3 filing threshold to \$50,000, not only to proactively address inflationary pressures going forward, but as a reflection of the administrative burden and cost as a percentage of their receipts of smaller labor organizations.

**2. The proposed increases are still administratively burdensome on unions and the final rule should set higher LM-2 and LM-3 thresholds than the proposed rule provides.**

Section 208 of the LMRDA empowers the Secretary of Labor to accept “simplified reports” from small labor organizations for whom “a detailed report would be unduly burdensome.” 29 U.S.C. § 438. AFSCME asserts that the filing thresholds set forth in the proposed rule are administratively burdensome for many unions. The NPRM, and an Information Collection Request (“ICR”) it cites, provide the following estimates for compliance costs:<sup>6</sup>

**Table 1  
Individual Cost Burden of LM Forms**

Form	Hours to Complete	Cost per hour	Total Cost to Complete
LM-2	530 hours	\$52.98	\$28,079.40
LM-3	103 hours	\$39.11	\$4,028.33
LM-4	9 hours	\$37.38	\$336.42

<sup>4</sup> This is calculated from OLMS’s estimated cost for the LM-3 of 103 hours at \$39.11 per hour, given in the NPRM.

<sup>5</sup> Assuming a future inflation rate of 2.57%, \$10,000 in 1992 will be equivalent to just over \$25,000 by 2030.

<sup>6</sup> This table is compiled from estimates given in the discussion of the NPRM and in Table 2 of the ICR cited at footnote 6 of the NPRM. See 90 Fed. Reg. 28251, 28253 (July 1, 2025); OFF. OF LAB.-MGMT. STANDARDS, DEP’T OF LAB., OMB CONTROL NO.: 1245-0003, SUPPORTING STATEMENT FOR THE INFORMATION COLLECTIONS: LABOR ORGANIZATION AND AUXILIARY REPORTS 19 (2024), [https://www.reginfo.gov/public/do/PRAViewDocument?ref\\_nbr=202407-1245-001](https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202407-1245-001) (estimating the cost burden of completing various LM forms). The total cost to complete each form was determined by multiplying OLMS’ estimates for hours and costs per hour.



OLMS gives no explanation, in either the NPRM or the cited ICR document, for how it reached these estimates. AFSCME believes that the NPRM underestimates the actual costs per hour of compiling LM reports. The union employees needed to prepare and file LM forms are professionals—auditors, accountants, lawyers, etc.—and the cost of their time is much higher than that of more general administrative staff with less expertise for completing the forms on which the NPRM relies. Therefore, the costs incurred by unions to prepare their LM forms in fact substantially exceed the estimates generated by OLMS in the table above.

Additionally, these estimates differ from prior OLMS calculations. See RIN 1245-AA08, 84 Fed. Reg. 68842, 68848 (Dec. 17, 2019) (“Therefore, the total cost for the 115 new filers to complete the Form LM-2 is estimated to be... **\$35,902.20 per filer.**”). In RIN 1245-AA08, OLMS calculated the cost per hour for filing LM forms by *doubling* the average salary of union employees in order to account for overhead costs and fringe benefits. See *id.* Applying that same methodology to OLMS’ estimates here would yield a total cost for each LM filing that is twice as high as the estimates in the above table.

Although AFSCME believes OLMS’ estimates fall below the actual total compliance costs, as explained below, even the estimates relied upon by OLMS indicate that compliance is unduly burdensome. The following table expresses the estimated costs as a percentage of receipts for LM filers:

**Table 2**  
**Cost Burden of LM Forms as a Percent of Annual Receipts**

<b>Form</b>	<b>Minimum Receipts</b>	<b>Cost Estimate</b>	<b>Percent of Receipts</b>
LM-2	\$450,000	\$28,076	6.2%
LM-3	\$25,000	\$4,028	16.1%

AFSCME is unaware of any other regulated entities that are required to expend six percent to sixteen percent of their annual receipts on federal financial reporting. Expressed as a percentage of receipts, it is clear that the proposed threshold is out of keeping with federal policy that reporting burdens must be kept to a minimum. For example, Executive Order 14192 (“Unleashing Prosperity Through Deregulation”) declares it executive policy to “significantly reduce the private expenditures required to comply with Federal regulations.” 90 Fed. Reg. 9065 (Jan. 31, 2025). The Paperwork Reduction Act requires agencies to “minimize the paperwork burden... resulting from the collection of information.” 44 U.S.C. § 3501(1). And the Regulatory Flexibility Act mandates that agencies consider the impact of reporting requirements on small entities, such as the labor organizations affected by this proposed rule, and consider alternatives that ease their regulatory burden. 5 U.S.C. §§ 601–604. AFSCME believes that larger threshold increases and redaction of public LM-2 forms, discussed further below, are alternatives that minimize the regulatory burden on small unions.

Similarly, in section 208 of the LMRDA, Congress intended to relieve small labor organizations of the burden of filing disproportionately onerous forms. 29 U.S.C. § 438. Yet, the current proposed rule fails to provide small unions with this relief.



Raising the LM-2 threshold from \$250,000 to \$600,000 and the LM-3 threshold from \$25,000 to \$50,000 would substantially alleviate the costs and burdens for labor organizations. In the NPRM's discussion, OLMS estimates that unions that become eligible to file the LM-3 rather than the LM-2 will spend 427 fewer hours on administrative paperwork. These unions will also save over \$24,000, the difference between the total cost of filing an LM-2 and the total cost of filing an LM-3, as calculated in Table 1 above. Unions that become eligible to file the LM-4 rather than the LM-3 would see their reporting burden drop by 94 hours and save nearly \$3,700, the cost difference of filing an LM-4 versus filing an LM-3, as calculated in Table 1. Though AFSCME believes that this is an underestimation, as discussed above, it still amounts to significant easing of the regulatory burden, nonetheless.

AFSCME supports meaningful disclosure of financial information to union members, and AFSCME does not believe that raising the filing threshold will impede member access to financial records. AFSCME members have the right to a full accounting of all union funds, including the documentation that is relied upon and supports the information provided on LM forms. Financial reports required by other government agencies, such as the IRS Form 990, also provide the public and union members with transparency and accountability.

### **3. Inflation has also impacted the disaggregation threshold for vendor payments and OLMS should raise this threshold in the final rule.**

AFSCME urges OLMS to raise not only the filing thresholds for Forms LM-2 and LM-3, but all thresholds associated with LM reports. In particular, OLMS should raise the disaggregation threshold at which LM-2 filers are required to list itemized payments to vendors. Like the LM-2 filing threshold, the threshold for reporting itemized payments to vendors has not been adjusted since 2003. *See* 68 Fed. Reg. 58383 (Oct. 9, 2003). The relative value of this threshold has been eroded by substantial inflation, and relatively minor payments are now required to be reported. For the same reason that the NPRM seeks to raise the LM filing thresholds, AFSCME believes the final rule should raise the disaggregation threshold as well.

To account for past and future inflation, the disaggregation threshold should be raised to \$10,000. The disaggregation threshold has remained at \$5,000 since 2003, but disbursements of at least \$5,000 are much more common now than they were 22 years ago. Indeed, \$5,000 today has the buying power of only \$2,800 in 2003 dollars.<sup>7</sup> This means that payments half the size of those required to be itemized when the threshold was last raised must now be listed individually. Raising the threshold would help to ease the already heavy reporting burden faced by LM-2 filers.

Additionally, OLMS should raise this threshold to protect the financial integrity of the vendors receiving payments. As explained in further detail below, the public availability of detailed information in LM-2 reports exposes unions to substantial cybersecurity threats. Vendors are opened to similar risks of cyberattack when specific financial information about the payments they have received is freely

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<sup>7</sup> This is calculated by using the Bureau of Labor Statistic's Consumer Price Index Calculator at [https://www.bls.gov/data/inflation\\_calculator.htm](https://www.bls.gov/data/inflation_calculator.htm) to estimate the relative value of \$5,000 in 2025 versus in 2003.



available online. Sophisticated cybercrime syndicates, both domestic and international, can use this information to launch targeted cyberattacks against these recipients. For example, a bad actor could pose as a union in a phishing attack against a payee, using detailed information about the payments that pass from union to vendor to make the phishing attack more effective. Vendors who work with unions are not the parties intended to be regulated by the LMRDA and should not bear outsized costs of union reporting requirements. Further, LM-30 reports are required to ensure vendors are not favored based on personal or familial relationships. Raising the threshold at which the details of payments are made public minimizes cybersecurity costs for all parties while still allowing for financial transparency.

**4. LM-2 filers are uniquely vulnerable to cyberattacks by sophisticated crime syndicates because OLMS makes LM-2 reports available in unredacted form to anyone with access to the world wide web, a cost the NPRM fails to consider or incorporate.**

OLMS invites public comment on any general aspect of this proposed rule, and AFSCME believes that the updates to the LM-2 should also include redaction of employee names and titles, vendor names, and payee names when the form is published online. Unions that are required to file LM-2 forms must divert significant resources towards enhanced cybersecurity measures because their internal information is available to cybercrime syndicates and other bad actors around the world. This exposure generates substantial costs that the NPRM fails to consider or incorporate.

Like all organizations, unions can fall victim to phishing, spear phishing, and other cyberattacks, incidents of which have increased dramatically. Phishing, a type of cyberattack where bad actors pose as trusted individuals or organizations to trick victims into revealing sensitive information, has increased substantially since 2022.<sup>8</sup> Many labor organizations have experienced these exact kinds of attacks, in which phishers include an acute level of detail that makes it difficult to identify as fraud.

The cybercrime syndicates behind phishing attacks are often highly sophisticated actors, targeting their attacks at specific employees using information gleaned from LM-2 forms. Because phishing relies on the attacker successfully mimicking a trusted entity, the availability of employee names and titles, vendor names, and payee names on public LM-2 filings makes unions an easy target for cybercriminals. Attackers only need to search the LM-2 for the name of an employee's supervisor, or which vendors do the most business with the union, to learn who they should spoof to set the most effective trap.

Moreover, the exposure of so much sensitive information online also limits unions' effectiveness in protecting themselves. Among the vendors listed in the LM-2 are information services providers including the very cybersecurity tech companies that unions hire to help protect themselves against cyberattacks. Making the names of IT vendors publicly available allows cybercrime syndicates to exploit known infirmities in IT software and can help bad actors to infiltrate union computer systems even further, as these companies have access to important systems and work closely with union staff on matters concerning information technology.

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<sup>8</sup> CECOM CIO G6 Cybersecurity, *Secure our world—CECOM raises awareness about phishing*, U.S. Army (Oct. 21, 2024), [https://www.army.mil/article/280696/secure\\_our\\_world\\_cecom\\_raises\\_awareness\\_about\\_phishing](https://www.army.mil/article/280696/secure_our_world_cecom_raises_awareness_about_phishing) (reporting a 40% increase in phishing incidents since 2022).



Unions incur significant costs because so much of their information is made public. For one, they must train their employees to be knowledgeable and vigilant against phishing and other fraudulent online activity. Additionally, many unions carry cyber-liability insurance, which requires the organization to invest in extensive cybersecurity measures, such as multi-factor authentication, endpoint detection and response software, and regular computer software updates, in order to obtain coverage. Many unions are also increasing their crime insurance policies to include protection from cybercrime.

Unions that file LM-2 forms generally must have higher coverage limits to guard against the risks that come with the publication of so much sensitive information. All of these protective measures impose significant costs on labor organizations that have not been incorporated into OLMS' assessment of the regulatory cost and burden of filing LM-2 forms that are made publicly available. Yet, when cybercriminals are able to access employee and vendor names easily online, these investments are rendered less effective.

The rise in phishing and other cybercrime has burdened unions with costs that are not likely to shrink in the foreseeable future. As phishing attacks become more sophisticated, unions that are targeted and forced to make insurance claims will see their premiums rise significantly. Cybersecurity costs have increased dramatically in just the last few years, and there is no reason to believe this trend will not continue.

**5. LM-2 reports should redact employee names, employee titles, vendor names, and payee names to ensure financial integrity.**

OLMS has the statutory authority to apply reasonable restrictions to the publication of completed LM-2 reports, and the redaction of this sensitive information is a reasonable restriction. The LMRDA requires that the Secretary “make reasonable provision” for public inspection of the information contained in LM-2 filings. 29 U.S.C. § 435(b). Free public access to a redacted LM-2 filing constitutes “reasonable provision” of the report, while also implementing vital safeguards for the digital age.

When the LMRDA was enacted in 1959, policymakers could not have imagined the world wide web or the ubiquitous personal computers and devices as they exist today. The statutory provision that LM reports are “public information, and the Secretary may publish any information and data which he obtains” was adopted in the context of paper documents and far more limited information systems. 29 U.S.C. § 435(a). OLMS should consider the changes brought by modern technology when effectuating this provision. Unlike in 1959, today sophisticated criminal syndicates both inside and outside of the country can easily access LM-2 filings online and use the information to attack labor organizations, potentially undermining union financial integrity and members' trust.

Redacting this limited set of information would not meaningfully impact member or public access to union financial information. Labor organizations remain under a statutory duty to “permit [any] member for just cause to examine” any records necessary to verify the LM-2 filing. 29 U.S.C. § 431(c). Moreover, AFSCME does not propose that the LM-2 be completely removed from public



inspection or made more difficult to find—only that sensitive details be redacted from public view. The amounts paid out to each employee, vendor, and payee would remain visible online, ensuring that union members could still easily assess the financial viability of their unions and inspect the revenue flows coming in and out. Reports required by other government entities, such as the IRS Form 990, also provide relevant financial information to the public and allow for transparency into union finances.

### ***Conclusion***

AFSCME strongly supports OLMS’s proposal to raise the thresholds for Form LM-2 and LM-3. These thresholds have not been raised in decades, and in the meantime, inflation has significantly eroded the relative value of unions’ annual receipts so that today even modest-sized unions are required to file overly burdensome reports. However, AFSCME urges OLMS to raise the threshold for Form LM-2 to \$600,000 and the threshold for Form LM-3 to \$50,000. Congress intended that small and medium-sized labor organizations should not have to report the same level of financial detail as large labor organizations, and raising these thresholds will generate substantial cost savings that will be better put towards representing members. AFSCME also urges OLMS to raise the thresholds for itemized reporting of vendor payments, to account for inflation and protect against cyber-risks. Finally, AFSCME further encourages OLMS to allow for redaction of employee names, employee titles, vendor names, and payee names from LM-2s in the final rule, in order to lower the cybersecurity costs currently burdening LM-2 filers. Doing so would promote the financial integrity of labor organizations by lessening the potency of cyberattacks, while retaining most of the financial transparency from the public availability of LM-2 reports. AFSCME appreciates your consideration of its comments.

In solidarity,



Teague Paterson  
General Counsel



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TP/NS:rm

