

Dear Director Rosenfield ,

The Pelican Institute for Public Policy is a 501(c)(3) non-profit, nonpartisan research and educational organization and also currently serves as the leading voice for free markets in the state of Louisiana. We have long worked to create transparency and empower workers in Louisiana. It is with these principles in mind that we write to you in support of the proposal to promulgate a rule governing intermediate bodies and their reporting requirements under the Labor-Management Reporting and Disclosure Act (LMRDA) of 1959.

The Pelican Institute is committed to transparency for the Louisiana government. Apart from operating a website named Louisiana Sunshine, which contained information on government salaries, the Pelican Institute has pushed to increase transparency on everything from education spending to spending on capital construction. This has resulted in the creation of both the Louisiana Checkbook and Inside the Vault online portals, which provide important information to everyday citizens. We believe that this government transparency is crucial to preventing corruption and making sure citizens are getting the government their hard-earned money is funding.

The Pelican Institute believes this principle of transparency for those funding governments also applies to intermediate bodies of public employees.

In the state of Louisiana, the Louisiana Association of Educators represents thousands of teachers who pay millions of dollars in union dues. Often, these teachers are aware that some portion of these dues go to support their local union but have little knowledge of the other unknown causes their money is being used to support. As the Pelican Institute has worked with teachers to exercise their First Amendment rights in light of the *Janus v AFSCME* decision, many teachers have expressed concerns over where their union dues are going and how they are being spent.

By applying the LMRDA reporting standards to intermediate bodies, such as the Louisiana Association of Educators who would be covered by this proposed rule change, teachers will now have more information on how their dues are being spent. This will empower them to make a better and more informed choice on whether they want to continue to allow the union to speak for them.

This transparency will not only provide more choice to union members, but will also force unions to be more accountable to their members.

The Pelican Institute strongly supports the U.S. Department of Labor's adoption of the proposed rule changes RIN 1245-AA08 regarding "Labor Organization Annual Financial Reports: Coverage of Intermediate Bodies."

Sincerely,

Daniel Erspamer

CEO

Pelican Institute