

NATIONAL RIGHT TO WORK LEGAL DEFENSE FOUNDATION, INC. 8001 BRADDOCK ROAD • SPRINGFIELD, VIRGINIA 22160

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Monday, April 06, 2009

Secretary of Labor Hilda Solis C/O FOIA Coordinator U.S. Department of Labor - OASAM Room S-3317 200 Constitution Avenue, N.W. Washington, D.C. 20210

Dear FOIA Coordinator:

This is a request for information filed under the Freedom of Information Act.

I request that the Department of Labor provide the following:

- 1. Any (a) correspondence, (b) transcriptions and notes from meetings, (c) reports and handouts, (d) proposals, or (e) speeches involving Hilda Solis or any DOL personnel and any AFL-CIO officer, any SEIU officer, any Teamsters officer, any Carpenters officer, NEA officer, or any other officer of any covered Labor-Management Reporting Act of 1959 (LMRDA) or any non-LMRDA labor organization since January 20, 2009.
- Any (a) correspondence, (b) transcriptions, (c) reports, (d)
 proposals, (e) speeches, or (f) notes of meetings related to
 LMRDA reporting requirements since the nomination of Solis as
 Labor Secretary.
- 3. From the time that Hilda Solis had knowledge of her nomination as Labor Secretary, please provide any (a) photographs, (b) videotapes, or (c) other digital images and/or sounds captured by DOL staff or contractors related to Solis and officers or representatives of any LMRDA covered labor organizations this

- list should include any state AFT or NEA officers and AFSCME regional officers.
- 4. List of any gifts received by Solis in the past 5 years from any LMRDA covered labor organizations or representatives including campaign contributions of any kind.
- 5. Any notes from any meetings related to the (a) Form LM-2 labor organization financial reports, (b) Form LM-3 labor organization financial reports, (c) Form LM-30 labor officer and employee conflict of interest reports and any DOL employees since 15 January 2009. Completely identify each attendee or participants by full name, title, employer, and any organization(s) that they represent.
- 6. Please provide any Department (a) notes, (b) minutes, or (c) documents created from November 4, 2008 through April 1, 2009 related to Deborah Greenfield's activities while Greenfield was a member of Obama Transition Team and while she was a member of the Obama Administration. Include notes taken by Department staff of any meetings with Greenfield that discussed policy, legal strategy, criminal enforcement, civil enforcement. Please provide copies of all requests made by Greenfield to any Department employee regarding any matters of (d) law, (e) policy, (f) strategy, (g) budget, or (h) enforcement. Provide all (i) documentation of all meetings during the requested time period with Greenfield and any labor organization representative. Provide all of Greenfield's sources of (i) income while appointed on the Obama Transition Team and while (k) working at the Department of Labor. Please include (1) Greenfield's title, (m) job description, (n) pay, benefits, and reimbursement, and any available (o) SF-278 filed by Greenfield.

- 7. Please provide a list of lawsuits involving the Department of Labor and Deborah Greenfield within the past eight years.
- 8. Please provide all (a) phone logs for Secretary Solis' DOL cell phone and office phone. Please provide all (b) phone logs for Deborah Greenfield's DOL cell phone and office phone. Please provide any (c) calendars for the Secretary and any (d) calendars for Deborah Greenfield inclusive of her time on the Transition team through date of receipt of this request.
- 9. Specifically provide in detail (a) notes, (b) agreements, (c) communications, and (d) agendas related to the regulations related to the LMRDA.
- 10. Please provide any notes or documents related to any enforcement of any labor laws and any outside groups such as labor unions, American Rights at Work, or ACORN.

Because Secretary Solis has been Secretary for a brief time, we expect that the requested information will be readily available. I request that the information that is currently in electronic format be provided in electronic format on an unencrypted DVD disc(s).

Among the many concerns that motivated these requests is the appointment of Greenfield, who is counsel in a lawsuit against the Department regarding conflict-of-interest reporting – the same conflict-of-interest reporting that the Department now intends to weaken.

I request a waiver of all fees for this request since the disclosure of the information that I seek is not in my commercial interest, and the requests, if provided, will obviously contribute significantly to public understanding of the operations or activities of the Federal government, making the disclosure a matter of public interest. If you choose to

assign any fees for searching or copying these records, please inform me before filling my request.

The National Right to Work Legal Defense Foundation is a nonprofit, charitable legal aid organization that funds litigation to "insur[e] that compulsory union arrangements do not unnecessarily impinge upon each worker's freedom of thought, association or speech." National Right to Work Found. v. United States, 487 F. Supp. 801, 807-08 (E.D.N.C. 1979). "The public has a paramount interest" in that goal. Id. at 807. See also UAW v. National Right to Work Found., 781 F.2d 928, 929, 933-35 (D.C. Cir. 1986) (the Foundation is "a bona fide, independent legal aid organization" whose "primary purpose is to render 'free legal aid to workers who are suffering injustices from employment discrimination arising from compulsory unionism arrangements between their employer and a labor organization, and assisting such workers in protecting [their] rights'").

If you deny any or this entire request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

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Mark A. Mix

President