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RE: Protest of UAW 2022 Officers Election by Will Lehman, Member in Good Standing of UAW Local 677

Dear Mr. Barofsky:

With this letter, I am formally protesting the 2022 UAW International Officer Election results in their entirety.

This election was characterized by a deliberate suppression of the vote of the rank and file by the entrenched UAW leadership. The union intentionally failed to provide adequate notice to the rank and file, who are not accustomed to direct elections and would not ordinarily expect to receive ballots. This fact is confirmed by the extremely low 9 percent turnout. Hundreds of thousands of members were simply unaware that an election was taking place and did not vote. In some locals representing tens of thousands of younger academic workers, turnout was less than one percent.

On top of the lack of adequate notice, what little “notice” that the union did provide was uneven and discriminatory, utilizing a Local Union Information System (“LUIS”) that a U.S. district judge noted “kind of cuts out the membership.” This ensured that union officials received notice while the rank-and-file workers who were more likely to vote for my campaign did not. As the court-appointed monitor, you were aware for months that the majority of locals were not uploading member information to LUIS and failed to take effective action. This discriminatory and unequal notice fails to realize the “one-person, one-vote” direct election that the rank-and-file voted to implement in the recent referendum.

The UAW had the resources and the means to provide effective notice of the election to all its members, as evidenced by the great lengths to which the union went to get out the vote for the Democratic Party in the recent national midterm elections. In its numerous mailings to its members regarding the national midterms, the union insisted, “Democracy is not a spectator sport.” But during the same period of time, the union deliberately kept its membership in the dark about its own election, slow-walking the required notice and limiting itself to cosmetic gestures such as putting up a few posters and updating a website now and then.

There is no innocent explanation for this contrast: if the union had put the same resources into its own elections that it put into its campaign in the national midterm elections, the turnout would indisputably have been far higher.

The entrenched UAW leadership's efforts to suppress the vote also included discrimination against locals more likely to vote for me, intimidation directed against me and my supporters, and spreading misinformation about voting deadlines and eligibility, as further explained below. Meanwhile, many members who wanted to vote were unable to receive ballots in time due to the union's deliberate failure to maintain accurate data regarding mailing addresses and membership status.

Under these conditions, which I describe in more detail below, the election results cannot be certified. Instead, ballots should be re-issued and a new election should be held. In the alternative, the names of all candidates should be added to the "runoff." In either case, this time adequate measures must be taken to prevent the union leadership from suppressing the vote and ensure that the entire membership is aware of the election and able to vote.

I am making this protest on my own behalf as a member and a candidate, as well as on behalf of one million of my union brothers and sisters who did not vote in this election. Whether they would have voted for me or for another candidate, we all had a right to participate in a meaningful democratic election—which this election was not.

This protest is being timely transmitted under Rule 9-3 of the Official Rules for the 2022 International Officer Election. I also stand by everything I have said in my previous letters, which I have attached as Exhibit 1. Under Rule 2-15, the election results may not be certified until the merits of this protest have been decided.

Regards,
Will Lehman

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A. BACKGROUND TO DIRECT ELECTIONS

1. Systemic Criminality and a “Culture of Corruption”

The elections that are the subject of this protest were forced upon the union by a consent decree imposed by the U.S. Department of Justice, which has described a “culture of corruption” within the UAW leadership. UAW leaders, including past presidents, were caught stealing millions of dollars of workers’ dues money to fund lavish personal lifestyles. Two recent UAW presidents and 10 other high ranking UAW officials were convicted and jailed, but local officials were also implicated in the scandal, including figures like Timothy Edmunds, Finance Secretary for Local 412, who embezzled millions of dollars.

On January 21, 2021, the UAW entered into the consent decree, in which the UAW “acknowledge[d] that there have been criminal convictions, allegations, sworn testimony, and judicial findings of past problems with fraud, corruption, and criminal conduct by certain officials within the UAW and certain of its related entities.”

The consent decree, which involved the appointment of a court-appointed monitor to oversee the UAW (the “Monitor”) stated: “UAW members [must] be able to democratically participate in their union’s affairs as guaranteed by the Labor Management Reporting and Disclosure Act of 1959.”

The consent decree stated that this entails the right to “honest and duly-elected officials” and mandated a referendum as to whether members wished to vote directly for international officers. The purpose of the referendum was to provide the entire membership with a fair opportunity to democratically challenge the entrenched leadership. A section of the present entrenched leadership of the UAW, which was left over from before the consent decree, campaigned against direct elections.

A referendum was conducted from October to December 2021. On December 2, 2021, the Monitor completed counting the ballots. The final results showed the membership was overwhelmingly supportive of direct elections, with 63.7 percent in favor. A total of 140,586 votes were tallied.

Following the referendum, the Monitor proposed and the U.S. District Court for the Eastern District of Michigan approved rules which note the following “important principle” which “will guide the 2022 Election:”

[C]onsistent with American democratic traditions, the right of every qualified member of the electorate to vote in this 2022 Election by secret ballot will be protected. This principle mandates the improvement of membership mailing information to ensure the enfranchisement of as many members as possible; the broad education of members on the

fact of the 2022 Election to facilitate as broadly as possible their participation in it; and the fair counting of ballots and certainty around the accuracy of the 2022 Election results. It further requires that to the extent that any participants in the 2022 Election engage in any anti-democratic efforts or policies, they will be swiftly addressed and eradicated.

At the UAW national convention, I was nominated as a candidate for the office of president. The Monitor deemed my candidacy “bona fide.”

This election that was just conducted failed to put these rules into effect. The membership was not “broadly educated” on the election, its “broad participation” was not “facilitated,” and the “anti-democratic efforts and policies” of the entrenched leadership were not swiftly “addressed” or “eradicated.”

2. The July 19, 2022 Status Report

In the July 19 status report, the Monitor’s office informed the District Court that, for much of 2022, the UAW leadership has stonewalled the monitor, denied it access to information to which it is legally entitled, and covered up for ongoing misuse of UAW funds, including by candidates for International office. The status report implicates incumbent UAW President Raymond Curry and Secretary-Treasurer Frank Stuglin personally in these actions. This raises considerable concerns about the fairness of the elections, because Curry also contested the race for presidency, and Stuglin was in charge of critical aspects of the election process.

The status report states, “the Union’s cooperativeness [with the Monitor] veered sharply in the wrong direction” earlier this year. It adds that “the UAW has slowed its production of other investigative materials to the Monitor and declined to timely share certain information about its efforts to implement compliance reforms.”

The status report explains that the UAW was systematically violating the consent decree:

Making matters worse, as the Monitor tried to carry on with his work, the Monitor uncovered evidence that the Union’s leadership and its then-lawyers were concealing from the Monitor an investigation by the Union into the mishandling of a sum of cash by a regional Assistant Director, a senior Union official. The Union withheld information about this misconduct and the related investigation even though, from early in the monitorship, the Monitor has had a standing request to the Union for prompt disclosure of information about all investigations into potential financial misconduct or corruption taking place in the Union. The Monitor had also specifically warned the Union’s President in writing about the need to comply with that demand, following a previous failure to do so. The Union compounded that violation of its obligation to cooperate with the Monitor by improperly excluding a representative of the Monitor from an “executive

session” of a meeting of the Union’s International Executive Board (“IEB”) in which factual information about this ongoing investigation was shared.

The status report notes that “these actions resulted in the apparent obstruction and interference with the investigative work of the Monitor in violation of Paragraph 18(d) of the Consent Decree.” The status report explains that US Attorney Dawn Ison convened a meeting with her staff and Curry at which she said the UAW and President Curry were engaged in “gamesmanship” and would “face action from the Department of Justice” as a result.

The status report also discloses that there are currently 19 open investigations against the UAW, including “five new matters that were opened since the filing of the Initial Status Report” in November 2021. The most recent report notes “it is still too soon to fully assess the Union’s progress in carrying out the reforms it must enact to sustain much needed cultural change” and that the UAW has a “great distance” to cover.

3. My Campaign and the Demands of the Rank-and-File

I am a member of UAW Local 677 in good standing. Prior to the elections, I had been active in rank-and-file committees of autoworkers. I had seen the “culture of corruption” described by the Department of Justice first-hand, and had watched the union apparatus that was supposed to represent members like me instead work relentlessly on behalf of management against the dues-paying membership.

I saw the 2022 direct elections as a historic opportunity to assert the interests of the rank and file against the corrupt bureaucracy, under conditions when the eight-hour day had been replaced by grueling “alternative work schedules,” stagnant wages were being eroded by soaring inflation, and the deadly COVID-19 virus had been allowed to spread unchecked through our workplaces.

My campaign called for the abolition of the UAW bureaucracy, which had been so thoroughly exposed by the corruption scandal. I called into question the entire corrupt apparatus, with its large salaries and perks, and insisted that it could not be patched up simply by indicting a relative handful of individuals.

My campaign also demanded full rank-and-file control over UAW assets, which had been built up with workers’ dues money, and the use of those funds to wage struggles for significant increases in workers’ pay and conditions of work. I also demanded an end to tiers, full funding for pensions and health care for retirees, a return to the eight-hour day, and an end to forced overtime.

I insisted that these demands were practically achievable by workers if they broke free of the repressive union apparatus that had been strangling and holding back their struggles for decades.

Despite the fact (or more likely because of the fact) that I had no experience in the UAW bureaucracy whatsoever, these ideas attracted wide support among autoworkers wherever my campaign volunteers and I went. My campaign was regularly active at dozens of different UAW workplaces, attracted active support among hundreds of rank-and-file UAW workers, and made contact with thousands of UAW workers. I ran openly as a socialist—the only candidate to do so.

My campaign represented an open challenge by the rank and file to the entrenched UAW leadership, which had campaigned against direct elections. These circumstances help explain why the efforts to suppress the vote for my campaign were so deliberate on the part of the entrenched apparatus.

B. NINE PERCENT TURNOUT: PRIMA FACIE EVIDENCE OF VOTER SUPPRESSION

1. Nine Percent Turnout—An Historic Low

One million out of the union’s 1.1 million eligible members did not vote in the election. A total of 104,776 ballots were counted in total, or the votes of roughly 9 percent of all eligible members. This extraordinarily low figure constitutes prima facie evidence of voter suppression.

Of these ballots, 4,777 were counted as voting for me (just under 5 percent). Curry and candidate Shawn Fain each received under 40 percent of the vote, winning less than 40,000 votes apiece. In other words, no candidate achieved a majority and no candidate was able to secure the votes of more than 4 percent of the electorate. On the basis of this count, a runoff is planned between Fain and Curry in which my name and the names of the other candidates will not appear.

In the course of the *Lehman v. UAW* lawsuit in November, summarized below, the UAW submitted an exhibit referencing Ray Curry’s October 12, 2022, opinion article in the *Detroit News*. The article, titled “Participation Key to Union Elections” constitutes a formal statement of admission that the election was illegitimate and meaningless. Curry wrote:

“The right to vote is only meaningful if ballots get to members...If turnout is at 14 percent, we must do better. No matter which candidate a member supports, we can all agree that the future of our great union is too important for just 20 percent of our membership to decide.” In other words, the real turnout was less than half of what the union president publicly acknowledged would be insufficient.

Also during litigation, the Monitor defended the low turnout by pointing to the turnout at the International Brotherhood of Teamsters’ latest presidential election. The Monitor noted that the 2021 Teamsters election had 14 percent turnout. A comparison to elections held by the Teamsters and other major trade unions that hold direct elections for national officers reveals that

the 2022 UAW election, if allowed to stand, will be one of the lowest turnouts—if not *the* lowest turnout—of any direct election for union president ever held in the history of the United States.

2. Lower Turnout by Order of Magnitude Compared with Other Unions

Comparing the 2022 UAW election to the 2021 Teamsters election is to compare the election with the lowest turnout in history to the election with the second lowest turnout in history. Even by this comparison, however, the 2022 UAW did far less to mobilize its membership to vote. There were 173,558 votes cast in the 2021 Teamsters election, or 66 percent more than in the UAW election, and the Teamster’s eligible voting membership is only 8 percent higher than the UAW’s (1.2 million versus 1.1 million).

Turnout in Teamsters elections throughout the 1990s were an order of magnitude higher than in the 2022 UAW election. In the Teamster’s 1991 election—the first direct election in its history—there were 420,000 votes cast out of 1.5 million members at the time, or 28 percent turnout. Turnout in the 1996 Teamsters’ election was 500,000 out of 1.4 million, or 36 percent turnout. The average turnout of all Teamsters direct elections is 23%—two-and-a-half times higher than the 2022 UAW election.

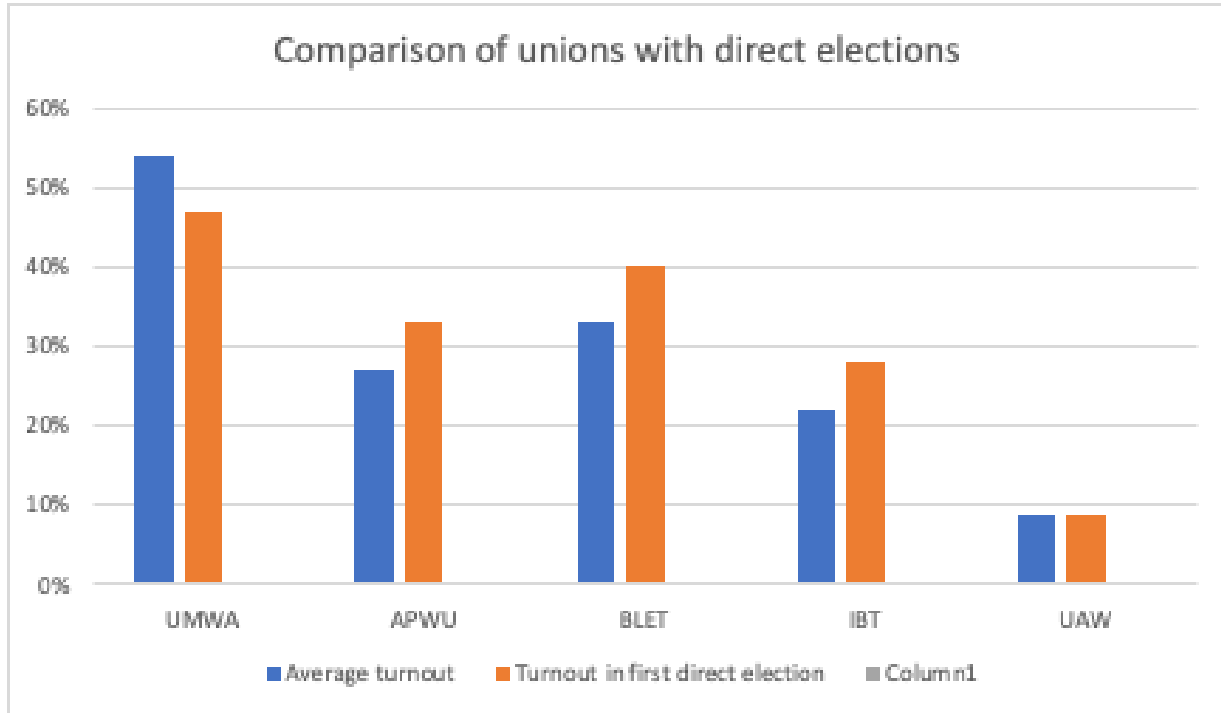
When compared to the direct elections of other trade unions, it becomes even clearer that the UAW leadership massively suppressed the vote. The following chart tracks turnout for the United Mine Workers of America (UMWA), the American Postal Workers Union (APWU), the Brotherhood of Locomotive Engineers and Trainmen (BLET) and the Teamsters (IBT).

In over half of contested direct elections, turnout has been at least three times higher than the 2022 UAW election. Turnout in the average UMWA direct election is six times higher than the 2022 UAW election. The BLET’s two contested direct elections had 40 and 26 percent turnout, in 2010 and 2022, respectively. The APWU’s turnout is on average three times higher than the 2022 UAW election.

When union memberships are given the chance to vote for national officers for the first time, turnout is typically relatively high. The Teamsters’ first direct election in 1991 had 28% turnout, or three times higher than the UAW’s 2022 election. The APWU’s first direct election in 1974 saw 33% turnout, three-and-a-half times higher than the UAW’s 2022 election. The UMWA’s first election in 1969 and the federally mandated re-vote in 1972 both saw roughly half of eligible voters turnout. In 2010, the BLET held its first-ever direct elections for international officers, with the union announcing in its official newspaper, “Nearly 40% of eligible BLET members cast a ballot in the first-ever membership election of National Division officers.”

Comparison of direct elections held by large US unions

	UMWA	APWU	BLET	IBT	UAW
First direct election	1969	1974	2010	1991	2022
Number of contested direct elections	3	17	2	6	1
Average turnout	54%	27%	33%	22%	9%
Turnout in first direct election	47%	33%	40%	28%	9%
Number of elections w/ turnout over 50%	2	0	0	0	0
Number of elections w/ turnout between 30 and 50%	1	9	1	1	0
Number of elections w/ turnout between 20 and 30%	0	5	1	2	0
Number of elections with turnout between 10 and 20%	0	3	0	3	0
Number of elections with turnout less than 10%	0	0	0	0	1
Average turnout compared to UAW 2022	Six times higher	Three times higher	Three times higher	Two-and-a-half times higher	x



3. Massive Decline in Turnout from Referendum

There were 36,000 fewer votes cast in the direct election than in the 2021 referendum on whether to hold direct elections, in which 140,586 votes were cast. This represents a 25 percent decline in turnout from the referendum to the direct election, under conditions where turnout should have *increased* because the UAW had more opportunities to update mailing lists and inform members. The decrease is objective evidence of the entrenched UAW leadership's efforts to keep its membership in the dark about the elections, which it tried to prevent.

4. Real (Rank-and-File) Turnout: Closer to 6%

Real turnout (votes of rank-and-file members, not officials or paid staff) is substantially lower than 9 percent.

At the beginning of the Monitorship, the LUIS system contained the names of 41,320 UAW members. The Monitor has stated that LUIS was used to communicate between international officials and local officials. Therefore, this group of 41,320 individuals represents the UAW apparatus. This number also corresponds with the number of votes cast against the 2021 Referendum *against* direct elections (50,971) pursuant to Curry and the leadership's express desire. According to LM-02 filings, the UAW has roughly 11,000 international and local officials, including 7,500 who receive remuneration.

Assuming that the roughly 41,000 current and former union officials and their close associates that were already in the LUIS system received notice and voted, and subtracting that number from the total votes cast in the 2022 direct elections, the real number of rank-and-file workers who voted in the election can be estimated at closer to 6 percent.

5. More Ballots Returned “Undeliverable” than Votes Cast

According to the Monitor, 110,571 ballots were returned as undeliverable or marked as returned to sender. This is higher than the total number of votes cast in the election. In other words, we know for certain that roughly 10% of the membership never received a ballot, that 80% did not vote, and that only 9% voted.

The figure also raises serious concerns about the global mailing list because the total number of undeliverable ballots is almost 20,000 *higher* in the direct election than the number of ballots that were returned to sender in the referendum, when the Monitor reported there were 91,402 such ballots.

C. “NOTICE” THROUGH THE LUIS SYSTEM: HOW THE LEADERSHIP “CUT OUT THE MEMBERSHIP” FROM THE ELECTION

1. Inadequate Measures to Inform Membership of Election

In its referendum report, the Monitor noted that “At the onset of the monitorship, the UAW did not have a sufficiently accurate or comprehensive centralized mailing list for its members.” The report also noted that “not all Local Unions routinely uploaded (or even had the technological capacity to routinely upload) that information to LUIS. The UAW’s mailing list therefore required significant attention.”

On November 21, 2022, Glen McGorty, who leads the Monitor’s “Election Team,” submitted an affidavit in the *Lehman v. UAW* lawsuit, which comprehensively described what the Monitor and UAW leadership did (and did not do) to notify the UAW membership that an election was taking place.

First, McGorty states in his declaration that “a substantial component of the Monitor’s elections work has been to oversee the Union’s improvement of the list of individuals to whom the Union would mail ballots in both the Referendum and the 2022 Election (the ‘Global Mailing List’), and to otherwise assist in updating the voter eligibility information stored by the Union.”

During the 2021 referendum, only two Local Unions out of over 500 contacted the Monitor to ask for help in uploading member data, according to the Monitor’s Referendum Report.

McGorty and the Monitor attached two exhibits which show the steps taken to develop this list before and after the referendum.

One exhibit was a “compilation of the Monitor’s above-referenced work to improve the UAW’s Global Mailing List prior to the Referendum.” This exhibit includes only two emails, one on July 12, 2021 and another on July 28, 2021. The July 12 letter is to “Local Union Officers” and it states: “As Local Union Officers, it is your responsibility...to prepare and forward an updated mailing list to the International Union via the Local Unions Information Systems (LUIS).”

The July 28 letter is to “All UAW Members” but it is unclear where or how this notice was distributed, if at all. Both letters are signed by Ray Curry, Frank Stuglin and Neil Barofsky.

The day after this letter was sent, the UAW’s former general counsel sent the Monitor an email dated July 29, 2021, with important information about the LUIS database. This email is referenced at page 162, footnote 689 of the Monitor’s November 11, 2021, status report. My attorney contacted the Monitor to ask that the content of this email be shared, but the Monitor has not replied.

After the referendum, McGorty’s declaration states that the Monitor and UAW conducted “an email initiative to Local Union leaders” encouraging them to “update contact information for members on LUIS, forward email notices of the election to members, disseminate such notices on social media, and physically post copies of them on official Union bulletin boards, at jobsites and in meeting halls.”

McGorty attached another exhibit, which he stated was a “compilation of the Monitor’s above-referenced work to improve the UAW’s Global Mailing List since the Referendum.”

However, this exhibit consists of just one letter, sent July 5, 2022, to “All UAW Local Union Officers” stating, “It is the responsibility of the Local Unions to make sure that its members’ addresses and eligibility status are updated and accurate on the LUIS system immediately.” It included an instruction to post a notice about the election at worksites, on social media, on Local Union websites, and “we also ask that you email the notice to all members of your Local Union with email addresses you have on file.”

Additionally, McGorty’s declaration states that the UAW also made “instructive postings on the LUIS system itself,” that it mailed a summer edition of *Solidarity* Magazine to “subscribing UAW members,” that a candidate forum for the office of president in September 2022 was held, and that the UAW mailed posters to Locals that included information about the election deadlines. The Monitor also set up a hotline to address concerns from workers who did not receive ballots.

All of these steps taken together fall far short of notifying the entire membership and taking real steps to boost voter turnout. Despite a history of systemic misconduct and a “culture of corruption” on the part of the entrenched leadership, this same leadership was allowed by the Monitor to remain on the equivalent of the “honor system” when it came to providing notice of the election to the membership. With no effective accountability or enforcement mechanisms in place, the union simply did the bare minimum or nothing at all in response to the Monitor’s requests. The failure of this toothless oversight framework is evidenced by the collapse in turnout.

2. Using the LUIS System to “Cut Out the Membership”

In a hearing held on November 22, 2022, in *Lehman v. UAW*, the attorney for the UAW, Richard Griffin, said that “ballots were mailed out to the LUIS system.” Judge Lawson acknowledged during the hearing that at the time of the referendum, “the Monitor indicated that there were problems with notice because of the deficits in the LUIS system.”

Later in the hearing, the attorney for the Monitor said, “With regard to the issues with the LUIS system...that system was not established as a mechanism originally for direct election, and so substantial work needed to be put in from the outset of the monitorship to improve that as a tool.” The Monitor’s attorney said of LUIS: “It’s a mechanism for communication between the local unions and the international.”

Judge Lawson asked, “It’s not primarily then to get information out to the individual members?” The Monitor’s attorney answered: “It was used in the referendum for the first time for that purpose.” The judge then asked, “And what was it used for before? You said—I thought you had mentioned something about improving communication or facilitating communication between the International Union and the locals, which kind of cut out the membership.”

Judge Lawson also asked, “Was the LUIS system ever used to either distribute ballots, notification or information in terms of ratification of votes?” The attorney for the Monitor answered, “I don’t believe so.” Judge Lawson required the Monitor to confer with the UAW and submit an additional filing explaining the origins of LUIS and to answer whether it has been used previously to hold contract ratification elections.

The UAW’s attorney submitted a sworn declaration stating: “member information in LUIS has not been used by the International in connection with ratification of collective bargaining agreements.” The declaration adds that LUIS “is an information portal and platform between the International Union and its Local Unions.” LUIS also consists of “a document library for Local Union officers containing internal UAW policies, administrative guidance, finance reports of the International Union and online documents prepared by the International Union to assist Local Union financial officers.”

In other words, the primary mechanism for giving notice in the election was a mechanism previously utilized by the union officialdom to communicate with itself. Relying on this system was discriminatory because it “cut out” the rank and file, in the words of Judge Lawson. That is, it “cut out” members more likely to vote against the entrenched leaders, and ensured a vote that was skewed in favor of supporters of the incumbents.

3. Less Than 15% of Members On Email List After Two Years of Oversight

In its Report on the Referendum, the Monitor made clear that before the Referendum, the UAW had no mechanism for communicating with its members via email. “At the outset of the Referendum, the Monitor learned that that LUIS contained email addresses for only 39,528 active members and 1,792 retired members (totaling 41,320).”

On July 16, Merriman River, the election vendor, informed me that its email list consisted of only 84,000 people. On July 21, I wrote the Monitor protesting the fact that this was less than 10 percent of the total membership. I pointed out in my email of July 21 that “Rule 4-7 states that I am entitled to ‘the entire list’” and that “there shall be no discrimination in favor or against any Candidate” regarding emailing the global list. Rule 4-7 also states that “all bona fide candidates” will have the opportunity to use “the list of the last known names, mailing addresses, and email addresses of all members.”

The Monitor replied on July 23 admitting that a substantial number of UAW Locals were refusing to update their email list. The Monitor’s email reads: “As to the availability of email addresses for members, both on the Global Mailing List generally and for Constitutional Convention delegates in particular: The International Union relies on Local Unions to provide members’ email addresses on the LUIS database. This is an imperfect process, in part because not all Local Unions collect email addresses for their members, nor upload them to the system” (emphasis added).

“Not all Locals” evidently meant locals representing 1 million UAW members whose email addresses were not on the list due to Local Unions refusing to upload them. In other words, the Monitor was aware that locals were in noncompliance with its requests, and took inadequate steps to enforce compliance, even though its own rules state that “all bona fide candidates” have access to the “email addresses of all members.”

Subsequently, Locals representing the vast majority of UAW members took no further action to update their lists. An email I sent on September 1, 2022, went out to only 81,121 people, according to Merriman River. At the end of the campaign, the global email list contained only 138,057 email addresses, and an email sent by my campaign in November reached less than 120,000 of these due to a high rate of invalid emails.

In other words, the UAW bureaucracy initiated LUIS as a list of 41,320 people who were current and former Local Union officers. At the beginning of the monitorship, 1.05 million UAW members were not on the mailing list. The Monitor knew that Locals were not updating their info, and took insufficient action to force them to update their lists, beyond one or two toothless requests co-signed by Ray Curry and Frank Stuglin.

The failure to update the email list in advance of the election was unfair and discriminatory, and affected the outcome of the election because it deliberately limited the pool of individuals who received notice of the election largely to a pool of officials more likely to vote for the entrenched leadership, “cutting out” rank and file workers like me and workers likely to support my campaign.

D. LOCAL UNIONS TOOK LITTLE TO NO ACTION TO INFORM MEMBERSHIP

1. Majority of Locals Gave Inadequate Notice to Membership

A substantial number of local unions did not take action to inform the membership of elections.

My campaign does not have the ability to audit the entire UAW, but I received information from over 100 workers at 55 Locals (over 10 percent of the total locals casting ballots) showing that the overwhelming majority of Locals intentionally refused to take action to notify the membership of the election and intentionally refused to update their email and mailing lists.

By its very nature, the survey I conducted vastly overstates the amount of notice workers received, since everyone filling out a survey about the election necessarily knew about it. If I could reach the one million members who did not vote, these figures would be even more telling. But as they stand, the data I gathered makes clear that many locals took no action to inform their membership that an election was taking place. The figures also show that the locals took no action to update LUIS or to instruct their members to update their information so they could receive a ballot and cast a vote.

At 35 of 55 locals, workers never received an email from any candidate for office, or 63.6% of all locals surveyed. At 38 out of 55 locals (69.1%), workers did not receive any physical mailing notifying them of an election or of their right to update their mailing address or email address, versus only 5 locals (9.1%) where workers did receive such notice.

At 41 of 55 locals (74.5%), the local did not send a single email informing members of the election or reminding them to update their contact information. At only 5 locals did locals send at least one such email. Fifty-one of 55 locals (92.7%) did not make any attempt to reach members via text message or phone call about the election or the need to update their information. Forty-nine of 55 locals (89.1%) did not hold any type of public event about the election. Thirty-four of 55 locals (61.8%) did not put up posters about the election or asking

members to update their information (this is likely an understatement because some workers reported only seeing posters for candidates). At 36 locals (65.5%) the locals provided no notice whatsoever of deadlines to request ballots or cast votes.

At 13 locals (23.6%), TPTs were unaware that they were eligible to vote, and at 9 (16.4%) retirees were similarly unaware.

2. Widespread Problems With Notice and Ballot Access

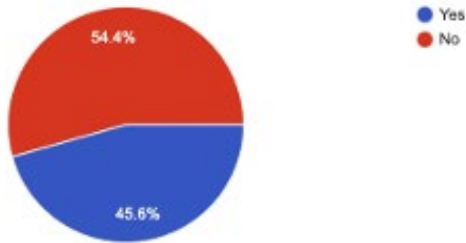
A majority of workers (54.4%) who completed a survey I circulated said they only learned about the election through my campaign. A majority of workers also said either they or someone they knew was unable to vote (55.1%). A third of workers did not receive a ballot, and of those who did receive one, 35.1% only did so after requesting a ballot.

57.7% of workers did not receive any email from any candidate running for UAW president. 80.6% never received a physical mailing from the International or their local informing them about either the election or their right to update their contact info in LUIS. 80.9% never received an email with such notice. 96.4% of workers never received *a single phone call or text message* telling them about the election or encouraging them to update their contact info for LUIS. 88.8% did not notice any posts on Facebook about the election, 96.3% say they never heard of any public events held by the Local to inform them about the election, and 75% percent said they never saw any posters about the election or their right to update their information in LUIS.

[See survey results on next page]

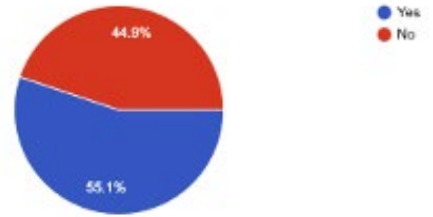
Did you know there was a UAW election before Will Lehman's campaign told you?

114 responses



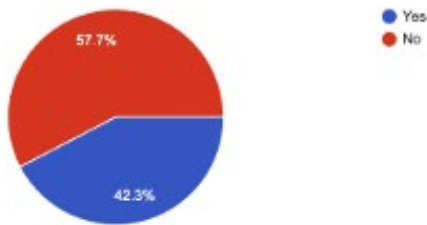
Were you or anyone you know unable to vote because you were unaware of the UAW election?

107 responses



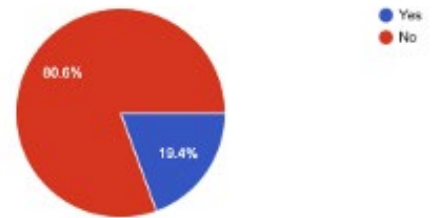
Did you ever receive an email from any of the candidates running for UAW president?

111 responses



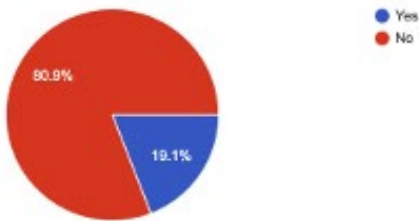
Did you ever receive any physical mailings from IUAW or your Local informing you about the UAW election or to update your contact info?

108 responses



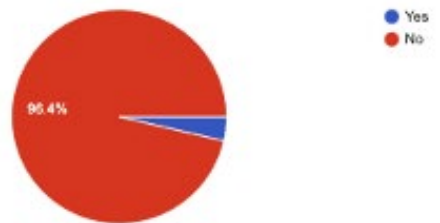
Did you ever receive any email from your Local informing you about the UAW election or to update your contact info?

110 responses



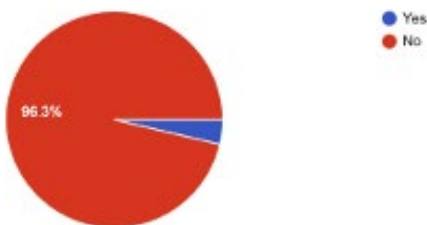
Did you ever receive any phone call or text message from your Local informing you about the UAW election or to update your contact info?

110 responses



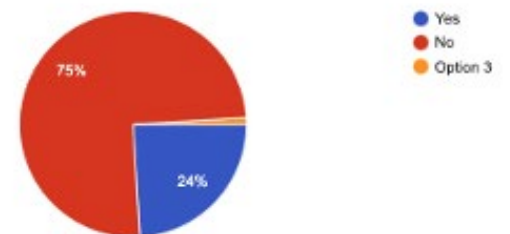
Do you know of any public events your Local held related to the UAW election?

109 responses



Did you see any posters at your workplace about the upcoming election?

104 responses



3. A Significant Fraction of Members, Possibly a Majority, Never Received Ballots

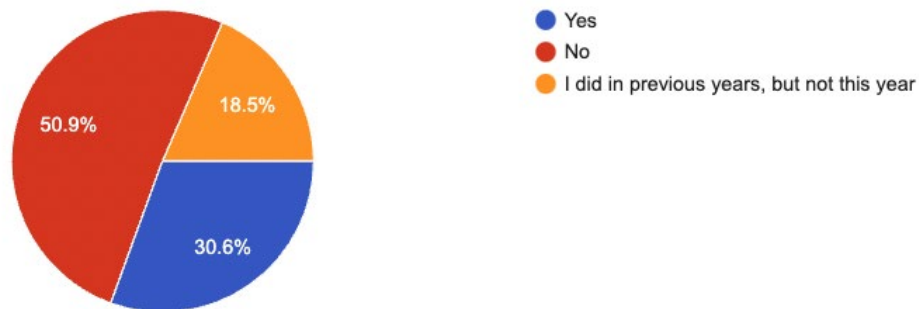
In addition to the 110,000 ballots marked as “undeliverable,” only 30.6% of survey respondents said they received a copy of Solidarity Magazine, which raises serious questions about the accuracy of the physical global mailing list. The UAW claims it sent over one million print copies of Solidarity Magazine, but the results of the survey indicate that up to 700,000 may not have received the magazine at all. If workers did not receive the magazine, that fact suggests that they did not receive a ballot either.

In federal court last month, the Monitor and UAW submitted a document saying LUIS is used to mail Solidarity Magazine. If that is the case, and if only 30.6% of workers received it, this would suggest that a similarly low number were ever mailed ballots. Furthermore, 18.5% of respondents said they did receive Solidarity Magazine in past years, but not this year.

Did you receive Solidarity Magazine this year?



108 responses



As recently as last year, only 3,609 members received the magazine. Its circulation is wildly inconsistent and there is no particular season which has a higher or lower circulation. Furthermore, the fact that the circulation did not change by a single person in Summer and Fall 2021 or in Winter and Spring 2022 makes clear that the union did not make any attempt to update the circulation figures during that period. The claim that notice was provided through this magazine is not credible.

I asked the Monitor for more information about the total number of magazines mailed to the membership this summer, and Mr. McGorty replied on December 16 to say that 1,013,911 print copies were physically mailed. This is roughly 32,000 less than the circulation that is stated on the July/August/September magazine itself, a figure amounting to 3 percent of the total.

Edition	Circulation
Fall 2019	3,635
Spring 2020	3,630
Summer 2020	500,249
Fall 2020	3,619
Winter 2020	3,635
Spring 2021	3,603
Summer 2021	512,532
Fall 2021	512,532
Winter 2021	3,609
Jan/Feb/Mar 2022	512,532
April/May/June 2022	512,532
July/August/September 2022	1,046,050

Mr. McGorty said in his December 16 email that “the first two issues” of Solidarity Magazine sent this year (Jan/Feb/March and April/May/June) “were sent to members who affirmatively opted-in and signed up to receive Solidarity Magazine.” It does not seem likely that 512,532 people affirmatively opted-in to receive Solidarity Magazine, but that is the circulation figure listed in those two issues of the magazine.

Even so, the figures reveal that some 500,000 members received Solidarity Magazine for the first time this summer, would not have expected to receive it and would not have known what the magazine is. Additionally, Mr. McGorty said in his email that the UAW did not keep track of the number of copies of Solidarity Magazine that were returned to sender or marked undeliverable.

4. Audit of Union Websites and Social Media Accounts

The Monitor claimed during the *Lehman v. UAW* litigation that by asking Locals to update their websites and social media accounts, notice was guaranteed to be provided to the entire UAW membership. An audit of the UAW Locals’ websites and social media accounts decisively disproves this claim.

Five hundred and twenty UAW Locals reported results in the 2022 election, according to statistics published by the Unite All Workers for Democracy (UAWD) group. Of these, only 43.7% have web pages. No notice was given via local websites to members in the majority (56.3%) of locals. Among the 227 locals with websites, 49 provided no notice whatsoever about any election between April 2022 and November 18, 2022.

An additional 137 Locals have pages designed based on a template from the Regions. For these pages, websites begin with regional URLs and evidently re-post documents, notices and information based on decisions made at the regional level. At almost all of these Locals, not a single post was made about the election, beyond a formulaic link to the most recent edition of Solidarity Magazine. This does not constitute genuine notice of an election.

In total, only 37 Locals out of 521 made at least one post about the election—or 7.2% of the total number of locals. A similar proportion—40 Locals out of 521—made at least one post encouraging members to change their address or update their email address to the LUIS system in order to obtain information about an election. Not a single Local website provided notice of deadlines to request or cast ballots, even though many local pages have calendars. There was not a single calendar maintained by any Local that incorporated deadlines to vote.

Based on audit of all local websites and posts from April to November 2022

	Total locals reporting votes	# without local websites	# with local websites	# with websites providing no notice of election whatsoever	# with websites linking to regional website with only generic post to solidarity magazine	# of local websites that made at least one post about election	Percentage of total locals in region that made any reference to election on local website beyond solidarity magazine	# of websites referencing address change /request to update email	# of websites referencing deadlines to request ballots/vote	Percentage of total locals in region that made any reference to address change/request to update email
Region 1	38	11	27	7	16	4	10%	0	0	0%
Region 1A	20	3	17	9	6	2	10%	2	0	10%
Region 1D	80	58	22	2	17	3	3.8%	2	0	3.8%
Region 2B	114	67	47	5	27	13	11.6%	10	0	8.9%
Region 4	84	49	35	9	19	6	7.3%	19	0	23%
Region 6	19	8	11	4	4	3	15.8%	3	0	15.8%
Region 8	89	50	39	4	32	2	2.2%	0	0	0%
Region 9	44	32	12	2	8	2	4.6%	3	0	7.0%
Region 9A	33	16	17	7	8	2	6.1%	1	0	3.0%
Total	521	293	227	49	137	37	7.2%	40	0	7.7%

The same is true for Local Facebook pages, where 11.5% of Locals made public posts about the election, and only 8% gave any notice to workers that they should update their email or physical addresses.

Based on audit of all local Facebook pages/groups and posts from April to November 2022

	Total locals reporting votes	# without local Facebook pages	# with local Facebook pages	# with Facebook pages providing no notice of election whatsoever	# of private FB pages	# of local public Facebook pages that made at least one post about election	Percentage of total locals in region that made any reference to election on public local Facebook page	# of public Facebook pages referencing address change /request to update email	Percentage of total locals in region that made any reference to address change/request to update email on public FB page
Region 1	38	14	24	7	9	6	15.8%	4	10.5%
Region 1A	20	3	17	3	7	7	35.0%	4	20.0%
Region 1D	80	38	42	20	12	9	11.2%	3	3.8%
Region 2B	114	74	40	17	11	12	10.5%	7	6.1%
Region 4	84	51	33	25	0	8	9.5%	10	11.9%
Region 6	19	9	10	7	0	3	15.8%	2	10.5%
Region 8	89	57	32	19	10	4	4.5%	2	2.3%
Region 9	44	32	12	6	1	6	13.6%	5	11.4
Region 9A	33	13	20	11	4	5	15.1%	5	15.1%
Total	521	291	230	115	54	60	11.5%	42	8.1%

The proportion of Locals that provided notice via Local websites or social media corresponds so closely to the turnout in the overall election as to leave no doubt that the refusal of these locals to take any action to inform their membership contributed to the 9 percent turnout.

This was a deliberate decision by the entrenched UAW leadership, using its networks in the Locals, to block the vast majority of rank-and-file workers from participating in the 2022 UAW election.

5. No Posters Put Up at Many Workplaces

Out of the 55 Locals surveyed, the results show that no posters about the election were put up at the following workplaces:

- Stellantis Detroit Assembly Complex (Jefferson)
- Stellantis Detroit Assembly Complex (Mack)
- Volvo Powertrain Hagerstown
- Ford Kansas City Assembly
- GM Arlington
- John Deere Des Moines Works

Beacon Health Options
Ford Chicago Assembly
Ford Dearborn Truck
GM Lansing Delta Township
Flint Metal Center
Delta Dental of Michigan
Ford Pilot Plant (NMPDC)
Kokomo Casting Plant
Ford Ohio Assembly
Heartland Human Care Services
New York Legal Assistance
University of Washington
Daimler Trucks Gastonia

This list is non-exhaustive and likely represents only a small minority of the plants where posters were not put up.

E. SUPPRESSION OF THE VOTE AMONG WEST COAST ACADEMIC WORKERS

1. Stopping the Students from Voting

The turnout among academic and student workers in the election does not have an innocent explanation. These workers comprise a large section of the union membership, they are newer members, and many are active in current labor struggles. These members voted in such small numbers that the low turnout can only be explained as deliberate and discriminatory voter turnout suppression.

[See chart on next page]

	Local 4123 (CSU)	Local 5810 (UC)	Local 2865 (UC)	Local 4121 (UW)
Total members according to Local	“Over 11,000”	48,000 (combined with 2865)	48,000 (combined with 5810)	“Over 6,000”
Ballots sent (according to Monitor)	2,296	6,074	30,138	9,195
Votes cast	29	328	921	72
Votes cast in 2021 referendum	58	707	1,918	675
Turnout decline from 2021 referendum	50%	54%	52%	89%
Turnout of total membership	0.26%	2.6% (combining both locals)	2.6% (combining both locals)	1.2%
Turnout of ballots sent	1.2%	5.4%	3.1%	0.78%

The UAW leadership had a clear reason for suppressing the vote at these Locals because the incumbent president had almost no support there. At Local 4123, my campaign won more votes than Ray Curry. At Local 2865, Curry won only 18%, at Local 5810 he won only 22% and at Local 4121 he won 32% (24 votes).

In other words, while very few of these members voted, when they did vote they voted for me in much larger percentages than in other workplaces. Suppressing the votes of academic and student workers, therefore, means discriminating against voters who were more likely to vote for me and less likely to vote for the entrenched leaders.

These members did not fail to vote due to “apathy.” The 48,000 members of the University of California system are engaged in a prolonged and bitter strike against the university, sacrificing their incomes and risking their careers in the struggle for their rights.

UAW Local 5810, which represents academic researchers and post-doctoral scholars, cast only 328 votes in the election for national officers, and then weeks later cast 4,756 votes on a contract ratification. Fourteen-and-a-half times more members voted on the contract than in the election. This is direct proof that the low turnout was not “apathy.” It was the product of a direct effort to suppress the vote.

Furthermore, only 2,296 ballots were sent to Local 4123. If this Local indeed has over 11,000 members as its website claims, there has yet to be an explanation of why the vast majority of members did not receive ballots or why 10,000 UC members who are on strike were never sent ballots. Even if this was because of local eligibility rules, it does not impact the abysmal turnout among those who were sent ballots.

I formally protest and demand an explanation for the low turnout among academic workers and for these numerical discrepancies.

2. Local 4121: More Notice to Officials Than to Rank-and-File

Nine members of Local 4121 (University of Washington) responded to the survey I circulated. Four are current or former officials of Local 4121: Two UAW stewards, one member of the UAW organizing committee, and one member of the UAW election committee. Five other respondents from Local 4121 do not hold positions in local leadership.

Comparing the responses of the four UAW officials to the five non-officials shows the officials had notice of the election but the rank-and-file members did not. All of the officials knew there was an election independently of my campaign, while less than half of the rank-and-file members were aware before I informed them. Two of the three officials answered that they received a physical mailing notifying them of the election or of the need to update their information in LUIS, versus one in five rank-and-file members who received such notice. All four of the UAW officials said they received an email from the local informing them of the election or their need to update their information, versus less than half of rank-and-file members who received the same notice. One of the officials reported receiving phone calls or texts informing them about the election, while none of the rank-and-file members did.

	Local 4121 Leadership	Local 4121 rank-and-file
Knew of election before Lehman informed them?	100%	40%
Couldn't vote or knew someone who couldn't?	25%	40%
Received candidate email?	100%	80%
Received Solidarity Magazine?	25%	0%
Received physical mailing notifying of election or need to change address/update email?	67%	20%
Received email from Local notifying of election or need to change address/update email?	100%	40%
Received call/text from Local notifying of election or need to change address/update email?	25%	0%

However, this is not the full picture, because even the answers submitted by the current and former Local 4121 officers show that the International attempted to disenfranchise not only the rank and file, but also a significant section of the Local leadership. Three Local officers left notes with their survey submission:

- “I made sure my contact information was up to date before this election, and I know it must have been correct because I was able to vote in the previous election (voting to have direct elections) and I hadn't moved since then. However, I did not receive my ballot until very late for this election. After waiting so long for one, I requested a ballot online on 11/8. I did not receive the ballot until 11/19. I still completed it and sent it in the next day, hoping it might be counted. No idea if it got counted or not, but I'm not hopeful, since my local was telling me that I needed to mail it back by 11/18 to make sure it would get counted. I'm frustrated that I was denied my right to vote.”
- “I requested a ballot but it didn't arrive until after the latest mail-by date for counting.”
- “I and others I know had to call the monitor and formally complain to get ballots. The ‘request a replacement ballot’ form wasn't enough.”

Two of the five Local 4121 members who are not local officers also submitted comments:

- “I did receive a ballot but didn’t even realize I had received it until it was too late to submit. It was a plain white envelope and it blended in with all of my mail.”
- “I was confused that I hadn't received a ballot yet despite confirming (and never needing to change) my address, so I requested a new ballot to be sent to me -- I forget exactly when that was, but I believe it was on the same day as the cut-off deadline of Nov 11. My original ballot AND the requested new ballot both showed up on the same day -- both after Nov 18, the UAW's recommended deadline for returning the ballot. They were both postmarked Nov 15. I returned one in hopes that my vote would be counted, but I've no clue whether it made it back in time.”

Moreover, zero University of Washington UAW members reported seeing posters for the UAW election anywhere. In the aggregate, this is evidence of voter suppression, and shows why only 72 members of Local 4121 voted. Turnout was 0.78% of the total ballots sent because the entrenched UAW international leadership did not want the graduate students at the University of Washington to have any say in the election.

3. Locals 5810 and 2865: Extremely Low Turnout Amid Mass Strike

A substantial section of UAW members employed by the UC system also filled out the survey I circulated, including members of Local 5810, 2865, as well as the SRU unit. These members are currently or were recently on strike, and so the low turnout obviously cannot be blamed on “apathy.”

	Local 5810	Local 2865	UC-SRU
Knew of election before Lehman informed them?	0%	50%	0%
Couldn't vote or knew someone who couldn't?	100%	80%	100%
Received Solidarity Magazine?	33%	0%	0%
Received physical mailing notifying of election or need to change	0%	0%	0%

address/update email?			
Received email from Local notifying of election or need to change address/update email?	0%	20%	0%
Received call/text from Local notifying of election or need to change address/update email?	0%	0%	0%
Received notice of deadlines from Local?	0%	10%	0%

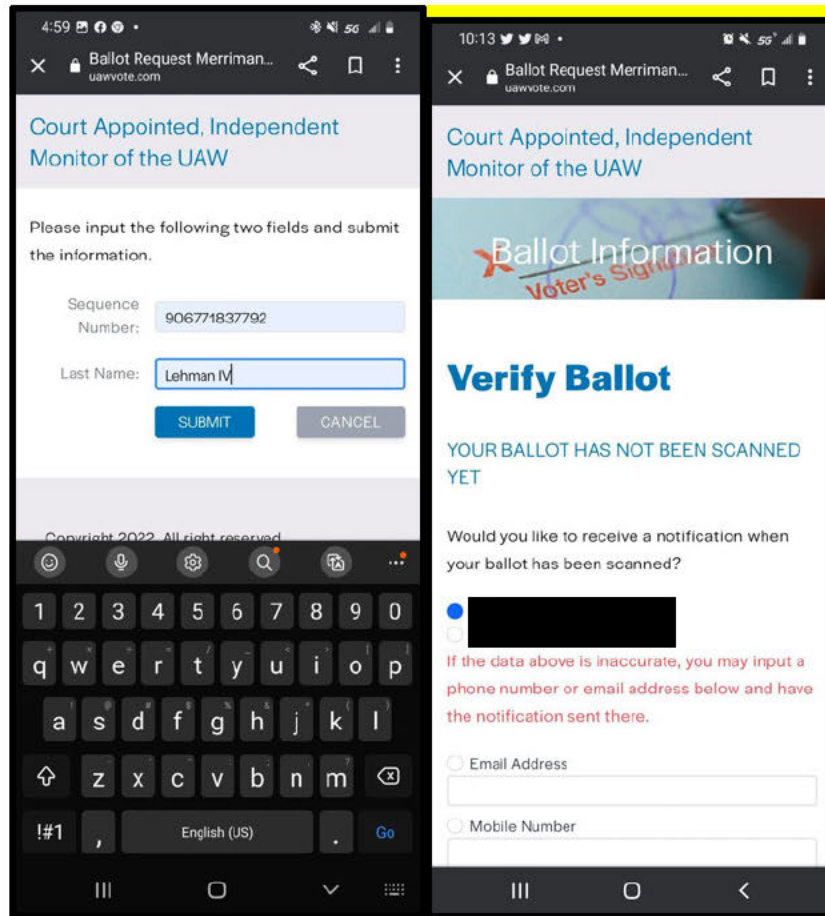
Like with the University of Washington, this is prima facie evidence of voter suppression. The figures above are particularly important because these UAW members were recently on strike. In other words, the UAW was capable of organizing a strike across more than 10 UC campuses but refused to inform the members that they had the right to vote in an election for UAW national officers. This was not due to incapacity, it was due to a deliberate decision to suppress the vote among these young members of the union who have little connection to the bureaucratic apparatus.

Furthermore, at the ballot counting in Dayton, my campaign was informed by a representative of Shawn Fain’s campaign team that the UAW at the University of California is run by Ray Curry supporters, and that the leadership of the UAW there deliberately did not send a text message out to its members encouraging them to vote, even though this was done during the referendum. The massive decline in turnout from the referendum to the direct election supports this inference.

F. MY OWN VOTE WAS NEVER COUNTED

I mailed my ballot well before the deadline but my vote was never counted. The screenshot on the right (see below) was taken on December 2 after the ballot counting had concluded in Dayton. My Local was counted in its entirety on November 29, as that is the day Region 9 was tabulated. (I have the metadata for the screenshot and can provide it upon request to show my ballot was not scanned well after my Local was counted).

Soon after I took this screenshot, the option to verify my ballot was removed from UAWvote.com. On this basis, it is evident that my vote was never counted. If this happened to one of the five candidates for president, who took great care to complete the documents accurately, it is overwhelmingly likely that it happened to countless other eligible members. If this did not happen to any of the other presidential candidates, this is prima facie evidence of an attempt to specifically discount votes for my campaign. A coworker of mine at my workplace also informed me in December that his ballot was never scanned, and that he had attempted to vote for me.



G. THE SUPPRESSION OF THE VOTE WAS DELIBERATE

1. The UAW Deliberately Selected Voting Procedures Calculated to Minimize Turnout

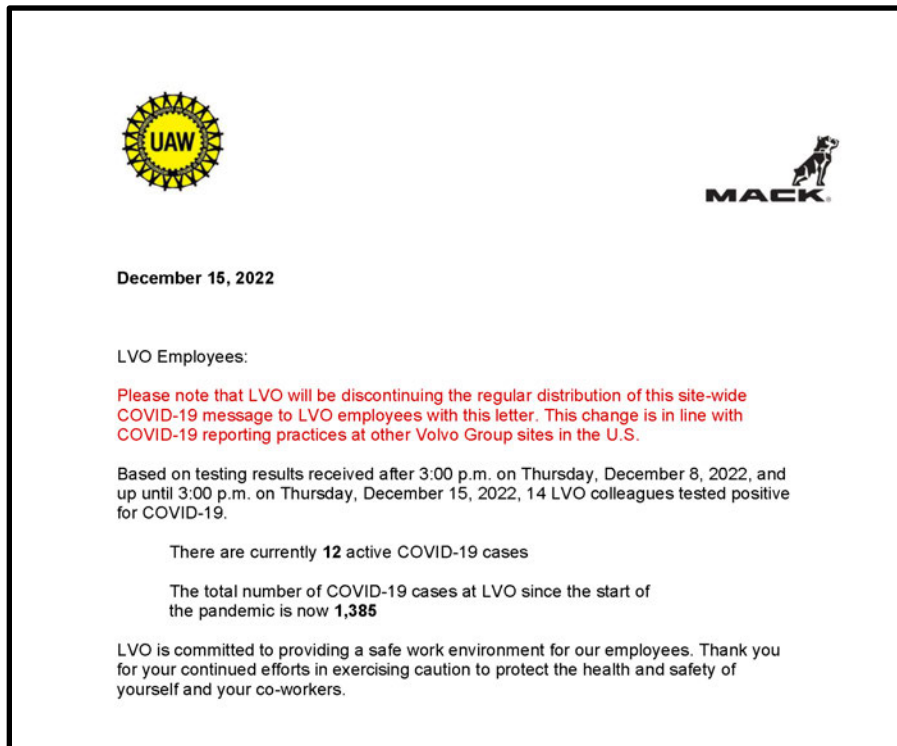
The UAW deliberately refused to take easy steps that would have guaranteed a higher turnout. In its first Status Report dated November 11, 2021, the Monitor and the UAW agreed that voting would take place by mail-in ballot. The report says, “Before reaching this conclusion, however,

the Monitor considered and discussed with various stakeholders a range of voting methods, including in-person voting and electronic voting.”

Citing “meeting with UAW” that took place in May and July 2021, the Monitor and UAW decided against in-person or electronic voting. The Monitor wrote:

“In person voting, which is the voting method traditionally used within the UAW, was rejected because of concerns that, among other things, it could have potentially depressed voter participation due to COVID-19, which could have discouraged the turnout of members to vote in an in-person election, particularly retired members or other members in high-risk demographics.”

This is simply not credible. The entire active membership of the UAW has been forced to work in workplaces in which COVID spread unchecked for more than two years. I very recently was sent a notice from the UAW that there are 12 active COVID cases at my own plant and that the total number of infections is 1,385, but that the UAW and management are not even going to count the number of positive cases anymore and we still have to come to work. Contract ratification votes have continued to be held across the UAW via in-person meetings despite the threat of COVID. For the UAW to claim that it could not hold in-person votes for national officer elections because it did not want to endanger the membership is plainly untrue. The UAW chose the mail voting method because it was calculated to minimize turnout.



The UAW and Monitor also agreed in 2021 that “Electronic voting would likely have posed further problems for the UAW given that the Union’s database initially only included email addresses for less than 5% of its membership.” This is an acknowledgment by the UAW and the Monitor that the database was totally insufficient to provide notice to the membership of an election, regardless of how voting was conducted. However, as a reason for conducting mail-in balloting as opposed to electronic balloting, it is illogical because the same database defects affected the outcome of mail-in balloting as well.

The UAW could have increased turnout if it wanted to. In the *Lehman v. UAW* lawsuit, by way of example, I outlined the following measures that would have increased turnout, but which the UAW refused to implement:

- Sending out daily communications via all Local UAW and International UAW email lists, social media accounts, and text lists.
- Making announcements and distributing written notice in the workplace, including during meal breaks and shift changes.
- Prominently posting written notices in the workplace, at local union halls, and on local union websites and social media spaces.
- Making replacement ballots available at Local Union halls for members to Pick-up.
- Setting up tables at workplaces during meal breaks and shift changes where UAW members can request and obtain replacement ballots.

The bottom line is that there were alternative ways of conducting the election that would have increased turnout, but the UAW (on false pretexts) deliberately chose the methods that would guarantee the lowest turnout. This intentional strategy contributed to the historically low turnout.

2. UAW Refused to Provide List of All Delegates in Violation of Rules

On July 25-28, the UAW held its convention in Detroit. In order to appear on the ballot, I had to obtain the nomination of at least one delegate at the convention. On July 13, the Monitor deemed my candidacy “bona fide.”

On Thursday, July 14, I called and emailed Mr. Stuglin to obtain from the UAW the full list of delegates, as is my right under Rule 4-11, so that I could contact them and ask for their nomination at the upcoming convention. The rule states that “all candidates have the right to request and receive from the Office of the UAW Secretary-Treasurer a list of the names and Local Union numbers of all Convention delegates.” (emphasis added)

Mr. Stuglin did not reply to my calls or emails. On Friday, July 15, at 4:30 PM, UAW Director of Information Systems Michael Lacour contacted me and said he had received a request for “some information” and would “provide direction on how to receive that information,” but that he was “heading out of the office for the weekend” and would not be back until Monday morning. He did not answer the phone when a volunteer for my campaign called him back at roughly 4:40 PM that same day.

On Saturday, July 16, I emailed Mr. Stuglin and Mr. Lacour to repeat my request that they release the full delegate list to me immediately. On the morning of Monday, July 18, I called Mr. Lacour back as he instructed me to do, and he told me he needed to ensure my candidacy had been deemed “bona fide.” I sent him the email from the Monitor’s office confirming I was *bona fide*, but he still did not provide me with any delegates list.

I only received a delegates list on the afternoon of July 18 after contacting the Vendor, Merriman River, whose representative informed me that this was only a “partial list.” This list contained only 841 names, which was roughly half the total delegates elected to attend the convention. Mr. Stuglin refused to provide me with the full list and did not respond to any of my communications. In other words, although the UAW was capable of organizing a convention at which nearly 100 percent of delegates attended and received credentials, it was unwilling to provide my campaign with a list of delegates. There is no way to interpret this other than a deliberate act to prevent me from securing the nomination.

Over the week of July 14, volunteers for my campaign called UAW locals to ask for delegate lists and identified themselves as representatives of my campaign. They were told on multiple occasions by local officials that the locals would not provide delegate lists to my campaign. Workers who support my campaign report that in multiple workplaces, lists of convention delegates that had previously been posted in a public location have been removed so that workers cannot learn who their delegates are.

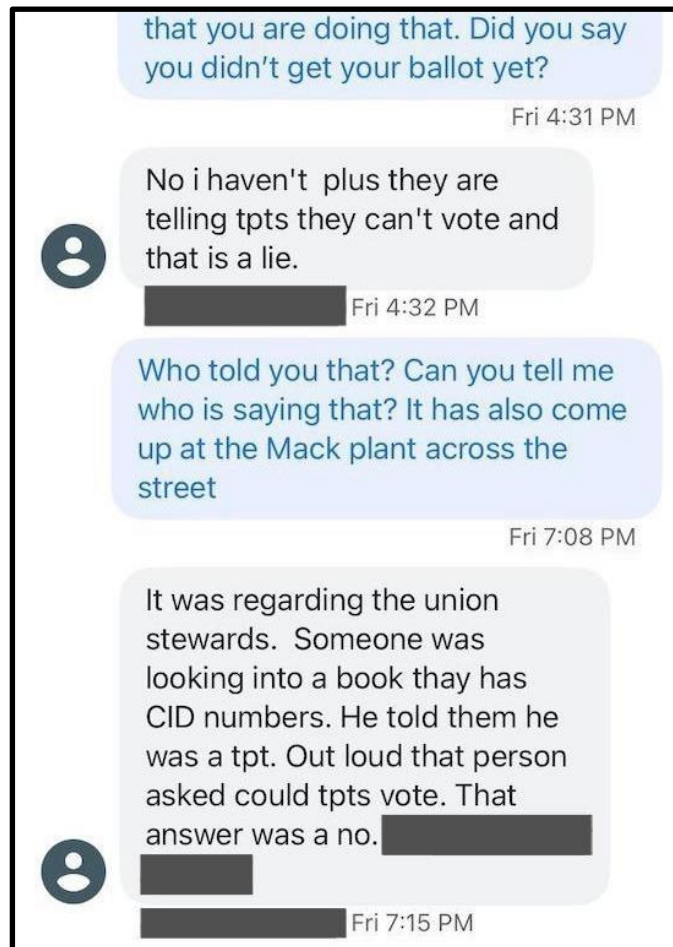
I was able to secure a nomination at the convention despite the efforts by Frank Stuglin and the UAW apparatus to stop me from communicating with delegates in an effort to prevent my name from appearing on the ballot. This history underscores the protracted and systemic character of the improper efforts by the UAW to obstruct my campaign, and is evidence that the subsequent failures to provide notice of the election to members was not accidental—it was deliberate.

3. The UAW Deliberately Misinformed Workers Regarding the Eligibility of Temporary and Supplemental Workers to Vote

On November 1, I made a formal protest after it was reported to my campaign that TPT (temporary part-time) and supplemental workers were being falsely told that they could not vote.

Workers at the Detroit Assembly Complex-Jefferson (formerly JNAP) in Detroit (UAW Local 7) and the Detroit Assembly Complex-Mack (UAW Local 51) reported to my campaign that UAW officials were telling TPTs that they do not have the right to vote in the election for International UAW officers. One worker reported to my campaign that a UAW official told TPTs that if they receive ballots in the mail, that they should not fill them out or mail them.

The fact that this misinformation was not confined to one UAW workplace strongly suggests that it was part of the deliberate efforts on the part of the UAW leadership to suppress the vote of TPTs.



[Statements by Local 7 worker at Detroit Assembly Complex-Jefferson]

Rule 5-1 of the Election Rules states: "Members who work only part time but pay the required dues may not be denied the right to vote."

The deliberate suppression of the votes of TPT workers has a clear motive. The TPT workers have been the subject of significant concessions by the UAW bureaucracy during the same period of time that the Justice Department described the UAW as having a "culture of

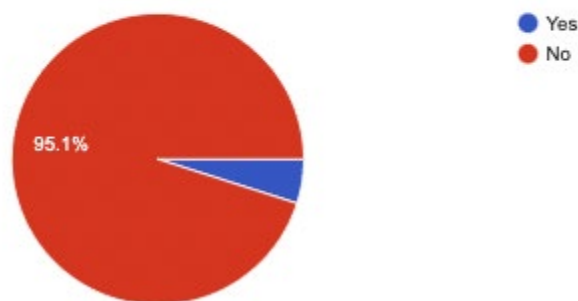
corruption.” TPT workers pay union dues but have no job security and make less for doing the same job as other workers.

Given their wages and working conditions, these workers were an important constituency for my campaign. They were objectively less likely to vote for the incumbents and more likely to support my campaign’s demands for an end to their second-class status. The suppression of these workers’ votes by means of deliberate misinformation, together with the failure to take decisive measures to remedy the damage following my formal complaint, further corrupted the election results and skewed the election results in favor of my opponents.

The Monitor and Ray Curry sent a note to UAW locals at one point reminding them that TPTs can vote. This note was merely cosmetic, and the locals ignored it. Approximately 95 percent of respondents to the survey I circulated said the UAW never informed them that TPTs were eligible to vote.

Did anyone from the UAW ever tell you that Temporary Part Time workers (TPTs) were eligible to vote?

102 responses



When I raised concerns over TPT eligibility to the Monitor, the Monitor told me they had made a post on LUIS notifying TPTs that they could vote. However, TPTs do not have access to LUIS, as this is an internal tool for the International and Local Unions. On November 8, I wrote the Monitor:

Hello Mr. Barofsky,

Thank you for acknowledging that there are issues with what the UAW is telling TPTs. You write that the UAW locals are each now required to "remind their members about ballot deadlines" and "confirm that members are aware TPTs are eligible to vote," but your email does not indicate how they will be required to do so and how workers can know it is being complied with. This is particularly concerning because the incidents I

reported were actions by local officials, so leaving it up to the UAW locals to fix is clearly not going to resolve the issue. ...

Please respond with the specific actions each UAW local is required to take to (1) remind members of deadlines and (2) inform TPTs they can vote, as your clarification says they must do. If you can respond today I would appreciate it as time is running out to correct these issues and workers are worried about their votes not being counted.

The Monitor failed to respond to this letter.

4. The UAW and Monitor Refused to Promote Candidate Forums and Debates

I participated in only one debate, streamed over the internet, with the other candidates on September 22, 2022. This debate was streamed by the Jenner & Block YouTube account and workers were not allowed to leave comments as they watched. The stream and subsequent views totaled only 20,000, inclusive of both members and non-members. In other words, at a maximum, this debate reached a tiny section of eligible voters (even assuming many if not most of the views were not by non-members). The union made no substantial efforts to distribute the video of the debate. I am not aware of a single local that promoted the debate.

I unsuccessfully petitioned the Monitor to take action to disseminate the debate more broadly. On September 26, I wrote the Monitor:

Dear Mr. Barofsky,

Rule 4-13 of the UAW monitor rules state that “The Monitor**shall distribute information about the forum and the recording of the forum to the Union membership.** The manner of distribution shall be determined by the Monitor, **after consultation with the Union and the nominated Candidates** or their Credentialed Representatives. In making this determination, the Monitor shall consider how best to use available resources and technology **to reach the broadest possible audience** of the Union electorate at a reasonable cost.”

So far, nothing seems to have been done to promote the video of the event. A video of the forum is not even on the UAW’s website. The UAW’s official Twitter account promoted a link for the debate for Secretary Treasurer, but did not make any posts about the debate for President.

A Google search for “UAW presidential forum” and similar terms does not yield a result in the first seven pages. The video has only 11,000 views, which is about 1 percent of the voting population. Given that the email list only includes about 10 percent of the voting membership, an email to the membership will clearly be insufficient. I have met many

workers who have told me they did not even know a debate or forum was happening.

Could you please outline what steps are being taken to ensure the recording of the debate reaches “the broadest possible audience” beyond the 1 percent who have seen it already? My campaign was never consulted about the manner of distribution pursuant to the rules.

The Monitor replied without listing a single step it had taken to publicize the event and did not explain its refusal to consult my campaign about the manner in which the forum would be distributed. Instead the Monitor wrote, “You are of course welcome to promote the Candidate Forums yourself.”

The debate itself was not neutral. While I was given an opportunity to speak, a false quote was attributed to me by the moderator, claiming that I had told the newspaper “Sasa Times” that I was in favor of the “complete abolition of trade unions.” The moderator repeated twice, falsely, that this was an “exact quote” and demanded that I explain it. In fact, I never said any such thing and there is no such newspaper at all. No such false quotations were attributed to any of the other candidates during the debate.

Following the debate, I protested the use of the fabricated quote to the moderator, former *New York Times* reporter Steven Greenhouse, but he refused to make any public statement correcting the fabrication.

This was the only debate between the candidates. While the rules contemplate candidate forums and debates—providing that if one candidate is invited, all the candidates must be invited—not a single local invited any candidate to speak. The refusal across the board to host debates in the first ever direct union election underscores the anti-democratic conspiracy of silence around the election, as well as the fear on the part of the established leadership that an informed electorate would vote them out.

5. Intimidation of UAW Members and Campaign Volunteers

The election was marked by numerous incidents of voter intimidation directed against my supporters.

On September 1, I formally reported an act of intimidation by the UAW, which violated my “Freedom to Advocate” pursuant to Rule 4-4 of the Official Rules and constituted discrimination by the UAW against my campaign under Rule 4-5.

During that incident, I was personally confronted by a UAW official who identified himself as Local 598 District Committeeman Sean Meachem while campaigning at the Flint GM Assembly plant. Meachem instructed me to leave, stated that he would inform management to call security, and took photos of any workers who spoke to me.

Rule 4-4 states, “All Union members shall have the right to participate in campaign activities, including the right to openly support or oppose any candidate ... Union members will be permitted to post or distribute leaflets, literature, or flyers; to solicit support, to conduct rallies; to hold fundraising events; or to engage in similar activities ...” This section of the rule explicitly states that “campaigning at the workplace” is allowed, as long as the members comply with employer rules.

Rule 4-5 states, “Retaliation or threat of retaliation by the UAW and/or its Local Unions; any officer, employee, or member of the UAW and/or its Local Unions...against a Union member ... for exercising any right guaranteed by this or any other sections of the rules is prohibited. This specifically includes each member’s freedom to advocate for or against any Candidate or Slate, to run for or seek to run for International Office ... and to vote for or against any Candidate or Slate. Any rules or practices ... that are contrary to this provision will be considered a violation of these Rules. Any and all appropriate disciplinary remedies may be imposed individually or collectively to groups ... on a case-by-case basis, for such violations.”

After I made this formal protest, a hearing was held but I was never notified of any remedial actions. Throughout the country, my campaign volunteers continued to speak with workers who stated they were afraid of retaliation from the union if they associated themselves publicly with my campaign. The failure to take decisive public action in response to my September 1 complaint allowed this repressive atmosphere to remain in place for the duration of the election.

UAW officials called security to remove campaign volunteers engaged in protected election activity at the Freightliner Truck Manufacturing Plant in Cleveland, North Carolina on October 14, the Ford Kansas City Assembly Plant on October 19, at the GM Fairfax Kansas City plant on October 20, at Dana Toledo on October 27, and at Metalsa in Elizabethtown, Kentucky on November 5.

Security removed volunteers engaged in protected election activity at many other workplaces, including GM Fort Wayne in Fort Wayne, Indiana; at Volvo NRV in Dublin, Virginia; at GM Arlington in Arlington, Texas; at Sterling Heights Assembly Plant in Sterling Heights, Michigan; at the Jefferson North Assembly Plant in Detroit, Michigan; and at Planters Peanuts in Suffolk, Virginia. In light of the context and the experiences at other plants, it is likely that there were UAW officials behind many if not all of these attacks on my rights and the rights of those members supporting my campaign.

At the incident at the Metalsa parts plant in Elizabethtown, it was UAW Local 3047 official Gary Parr who called company security and began taking photos of nearby license plates in an attempt to intimidate workers from learning about my campaign.

On Saturday, December 17, Region 4 Director Brandon Campbell threatened my campaign volunteers at a rally for striking CNH workers in Mount Pleasant, Wisconsin. Campbell began

taking photos of my volunteers. He then approached one volunteer, pointed to the masthead on our leaflet, “Will Lehman for UAW President,” and said, “Have you read the Monitor’s rules? I would read it for your safety.” I believe this was an implicit threat of physical violence from a leading member of the UAW.

The fact that these incidents were so widespread suggests that UAW officials deliberately coordinated these intimidation efforts among each other, in order to obstruct my campaign’s ability to reach rank-and-file members. In addition to intimidating my campaign volunteers and discouraging members from speaking with my campaign, these actions sent a message to workers that my campaign was somehow illegitimate or illegal, and that they could face discipline or retaliation if they were seen speaking to me or anyone associated with my campaign.

6. UAW Told Workers Wrong Deadline at GM Arlington (Local 276) in Texas

Workers at GM Arlington in Texas and Mopar in Centerline, Michigan, informed my campaign that UAW officials told eligible voters that the deadline to mail in their ballot was October 28, and that they need not send their ballots after that date because it was too late.

This was obviously not the correct deadline and represents a further effort to suppress the vote. On November 9, I wrote to the Monitor to demand this be investigated and that action be taken against the officials responsible if the reports were confirmed by the Monitor’s office. I never received a response.

7. UAW.org “Member News” Page Makes No Reference to Election Between July 29 and November 29

The section of the UAW website labeled “Member News” did not make a single post about the election between July 29, when the UAW published a blog post on the UAW convention, and November 29, when it reported results. This is a stark example of the deliberate conspiracy of silence around the election.

This is especially significant considering that a large portion of local union websites link directly to “Member News.” All local websites that have a URL beginning with the local’s region are updated directly through UAW.org/member-news.

Between July 29 and November 29, during the same period of time that the UAW intentionally refused to notify its membership of the election, UAW Member News published nine statements by Ray Curry.

H. UAW CONDUCTED SOPHISTICATED, PROFESSIONAL OPERATION TO INCREASE TURNOUT FOR DEMOCRATIC PARTY IN 2022 MIDTERM ELECTION

1. UAW Provided “Notice” of Federal Election But Not UAW Election

While the UAW and Monitor said the mailing of the ballot constituted “notice” in the UAW election, I received many physical mailers from the UAW instructing me to vote for the Democratic Party in the midterm elections. [See Appendix C]

The 2022 midterm elections coincided almost exactly with the UAW election. In one election, the UAW leadership wanted its members to vote. In the other, it did not. For the midterm elections, the UAW sent out countless mailers to members reminding us of our right to vote. It developed a complex text messaging campaign with regular updates about the election and the importance of voting. It organized events, supplied volunteers and spent substantial resources to pay advisors to develop a strategy aimed at most effectively convincing us to vote. In the UAW election, by contrast, the leadership was supposedly incapable of taking even the most basic steps like calling or texting its members.

On November 5, for example, the UAW published a blog entry titled “Why This Tuesday Matters to UAW members” which reads: “In our democracy, we, the American people, vote to elect our leaders. The people, not politicians, have the final say in deciding who will represent us. We cannot afford to take this fundamental right lightly...Democracy is not a spectator sport. If we do not use our power, we are in danger of losing it.” This is not the attitude the UAW took to the national officers election.

I received at least 6 mailers in the weeks before the midterm election with the UAW logo on it informing me to vote for Democrats in the election. These mailers say “paid for by the UAW” and have information about how to acquire ballots, where to mail ballots, what the deadlines are for voting, and who to vote for. The mailers include a text-for-info campaign, and instruct me to text “2022” to 99795 to receive further updates about voting. They say “Election day is November 8, Make Sure Your Voice Is Heard.” The UAW wanted me to know about the federal election because I live in Pennsylvania, but it did not want me to know about the UAW election.

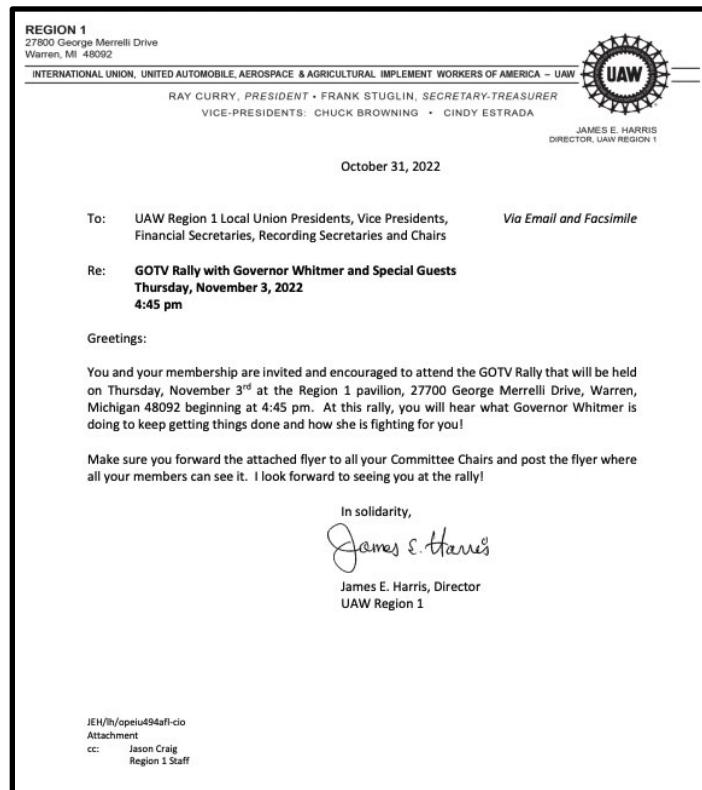
The UAW spent \$3,803,938 on the midterm elections, according to Opensecrets.org. There were many public events held by the UAW to “get out the vote for the Democrats.”

This did not just take place in Pennsylvania, but all over the country. For example, UAW Region 1, which did not hold a single event about the UAW election, held an event on November 3 to get out the vote for the Democratic Party. A large number of UAW officials gathered to give speeches about the importance of voting. Region 1 President James Harris said, “We have a

chance to take back the state house. We have a chance to take back the state senate, and we have an opportunity to retain the governorship... We can do those things if we get out and vote.”

Harris acknowledged that the UAW was mobilizing its apparatus to work hard to increase turnout...in the midterm. “We are going to be working on November 8 [election day], that’s not a day off for us. We are going to be out there grinding, pushing to get those last minute votes out, right?” The audience of UAW officials responds, “Right!” Harris responded, “I’m not concerned about you, I’m concerned about the people that don’t participate, that don’t get out and vote. I’m concerned about our families, our friends, our coworkers, our neighbors, our grandchildren. We need to make sure we talk to them and make sure they come out. Can I count on you to do that?” The crowd of UAW officials shouts: “Yes!”

The UAW also mobilized supporters for large scale “get out the vote” volunteer initiatives, held “meet the candidates” nights for Democratic Party candidates, organized a rally for Ohio Senate Democratic candidate Tim Ryan that was well attended by UAW officials who enthusiastically pledged to do their best to increase turnout for the Democrats. It held a GOTV rally at Region 1-D headquarters featuring Labor Secretary Marty Walsh and Democrat Dan Kildee. The UAW held a large Get Out The Vote rally in Oshkosh, Wisconsin with Senator Bernie Sanders to promote Democratic candidates as well. See Appendix D for screenshots and photographs from various UAW “GOTV” events held at the same time as the UAW officers’ direct election.



2. UAW Spends Substantial Amounts of Money On Public Relations Firms And Marketing Agencies to Notify Members of their Right to Vote in Federal Elections

According to the latest LM-02 filings from the UAW's National CAP program, the UAW spent \$700,000 in 2021 (non-election year) including large sums to public relations firms and marketing agencies to help the UAW notify its members of their right to vote for Democrats in federal elections.

To name a few, the UAW spent \$69,411 on "member communication" with Change Media Group, a firm which advertises itself as helping groups carry out "tailored strategy, high-impact creative, and ads delivered with maximum efficiency." Change Media Group promotes its work with the UAW on its website, which says: "Change Media Group is a data-driven advertising and creative agency that runs strategic, creative and targeted paid media campaigns to deliver impactful, movement wins for our clients. Our team is comprised of strategists, videographers, storytellers, digital experts, media buyers, data scientists, and designers... We use data and research to make informed decisions about message and strategy."

Its 2021 LM-02 shows the CAP spent \$1.6 million on political activities, including \$507,427 on "membership communication" to the political consulting firm "Superior Blue," a firm that specializes in direct mail and whose website says: "Campaigns are about offering an alternative to the status quo. Our communications strategies are designed to stand out, on the web or in the mailbox, and deliver alternatives to target audiences. We believe in simple: simple design and a simple message that cuts through the clutter. We provide compelling copy and innovative design to develop a clear message targeted to the right audience."

The UAW is also capable of sending mass text messages and did so regularly in 2021, according to the UAW National Headquarters' LM-02, which notes that the UAW spent \$95,974 sending "SMS Messages" and on "Mobile Communications" from February through December 2021 with the firm Upland IX LLC. Upland IX LLC's website advertises itself as helping clients "Build meaningful connections with your mobile audience via SMS texting service" and that its technology can "mobilize thousands of supporters at a moment's notice," that it helps clients "Grow your mobile audience using your website, social media, email and in-person opportunities," that clients can "boost get out the vote (GOTV) initiatives" and "help subscribers make a plan to vote."

In 2020, the UAW spent \$121,400 on "message polling" to determine the most effective way to convince members to vote for Democrats. During the general election cycle the UAW also spent hundreds of thousands of dollars reimbursing locals for "membership communication" regarding the 2020 midterm elections.

These are a limited number of examples. When it comes to informing the membership of its right to vote in midterm elections, it acts as a highly sophisticated, professional organization that expends significant sums of money and is capable of reaching out to its large membership and deploying its organizational capabilities to get out the vote for the Democratic Party.

3. UAW Used Up-to-Date Technology to Regularly Send Mass Mailers for Midterm but not UAW Election

The UAW used more up-to-date technology to determine my current address for federal election mailers, but did not use this technology to update the list to which it sent ballots in the UAW election.

I know this because last year I changed addresses. My ballot to vote in the UAW election was sent to my old address, which I luckily was still able to acquire. However, even though I did not inform the UAW that I had moved, I received UAW-purchased physical mailers promoting Democratic Party candidates for office in the 2022 midterm elections to my new address.

This means the UAW used a more sophisticated method for finding my address to send me mail about the Democratic Party and the federal election than it did in sending me my ballot in the UAW's own election. The UAW's refusal to use methods that it clearly had at its disposal to increase turnout in the UAW election (held at the same time as the federal election) is further evidence of a deliberate effort to suppress turnout.

I. THE MONITOR FAILED TO EFFECTIVELY SUPERVISE THE UAW

1. A Framework Designed to Fail

On Friday, December 2, during the vote tabulation in Dayton, Ohio I was physically present in the "independent election staff room" for a discussion with my attorney, Eric Lee, and Glen McGorty. Mr. Lee asked Mr. McGorty whether the Monitor had conducted an audit of the locals to see whether the locals had taken any action to inform their members that an election was taking place, or that members had to update their email and physical addresses in order to participate. Mr. McGorty said he had not undertaken any such audit.

Mr. Lee asked Mr. McGorty specifically whether he knew whether the academic workers locals in Washington and California had taken any specific action to inform their members of an election or of their obligation to update mailing and email addresses. I heard Mr. McGorty say that no, he was not aware of any specific action.

Mr. McGorty then told Mr. Lee "It is not my [i.e. the Monitor's] responsibility" to know whether the Locals had taken any action to inform their membership. Mr. Lee said it was Mr. McGorty's

responsibility, and the discussion concluded when Mr. McGorty said they “disagreed” about the Monitor’s responsibilities.

This exchange underscored the lack of accountability that characterized the entire election. The Monitor says: “Making sure notice is given is not my responsibility, that's the union's responsibility.” And the union says, “Making sure notice is given is not my responsibility, that's the locals’ responsibility.” Meanwhile, there was no mechanism in place to ensure that the locals actually gave notice to the rank and file. As a matter of empirical and demonstrable fact, as shown above, the locals did not give notice, and the result was a catastrophically low turnout.

This was a framework in which, as a practical matter, nobody was actually responsible for making sure the entire rank and file was notified of the election. It was a framework designed to fail and it failed.

2. Secret Ballot Guarantees Violated at Ballot Count Process in Dayton, Ohio

At the ballot counting in Dayton, Ohio, serious issues emerged about the ability of members of the IUAW to determine how members were casting their ballots on the count floor, in violation of the right to cast a secret ballot.

On the first day of the ballot count, during a walk through of the voting facility, Mr. McGorty informed those in attendance that the IUAW was allowed to have 5 officials present to “advise” the Monitor in a “neutral” manner about the conduct of the count.

One of these five officials, David Stalnaker, is a Top Administrative Assistant who publicly identified himself on Facebook as a member of the Curry Solidarity Team. On November 29, my attorney demanded that Mr. Stalnaker be removed from the counting process to minimize concern that he may engage in activity that threatens the right to a secret ballot, and that it is improper that a partisan of the entrenched leadership is “advising” the monitor in a “neutral” capacity. Mr. McGorty denied this request, and Mr. Stalnaker remained on the counting floor, observing the vote in close proximity to the ballots and to a computer located on the counting floor that was used by the five IUAW officials to cross-reference a list of members.

The observers representing Curry’s slate began using their cell phones on the counting floor in blatant violation of the rules. Between myself and another observer for my campaign, we personally witnessed three Curry observers on their phones, texting and talking, right on the counting floor in close proximity to open ballots. It is entirely possible that they were taking photographs of ballots, since representatives from the Monitor initially did nothing to stop them from using phones, though I did not personally witness the taking of photographs.

I also saw the same observers who were using their cell phones take part in hushed discussions with Mr. Stalnaker on the counting floor. I believe it is possible that these individuals were

engaged in efforts to use their access to the ballots to report on which workers had submitted ballots and which candidates they had voted for. It is particularly concerning because workers' names were on the return envelopes, which UAW officials would have been easily able to see at the station for opening ballots. The Monitor had officers on the counting floor and must have seen the Curry observers on their cell phones, because they were open about it. When I complained to the Monitor about this and demanded that the observers who had violated the rules be asked to leave the counting floor, the Monitor denied my request, refused to take action against those Curry observers who had violated the rules, and merely made a general announcement that phone use is prohibited.

The way that the Monitor handled this leaves open the possibility that the Curry team was determining how workers voted in violation of the right to a secret ballot.

3. Monitor ignores request to count late-received votes

On November 30, my attorney wrote the Monitor to demand that since thousands of phone calls had been made to the hotline complaining of problems receiving ballots, ballots received while vote counting was still ongoing should be counted and tabulated. My attorney wrote:

Dear Mr. Barofsky,

Will Lehman requests that all valid ballots cast by eligible members that are received by close of business on Friday, December 2 be processed and counted. This is necessary because a substantial number of UAW members either did not initially receive ballots or did not receive replacement ballots in time to vote.

Thank you,
Eric Lee

We did not receive a reply to this request, and I do not believe those votes were counted.

4. The Curry Slate Violated Election Rules By Abusing Union Resources

In an email dated November 9, the Monitor informed my campaign about "an Election Rules violation by the Curry Solidarity Team Slate."

The Monitor wrote that after an investigation, the Monitor ruled that the Curry team violated federal law by sending a campaign email to hundreds of workers on a list that was "obtained from a Union resource." The Monitor wrote that "The Curry Solidarity Team Slate violated Election Rule 4-6, which makes clear that federal law prohibits the use of Union resources, including contact lists that were created or compiled as part of official duties or functions, to promote the candidacy of any person in a Union election."

As a remedy, the Monitor merely gave my campaign the ability to send a 275-word email to the same list. On November 10, I wrote to the Monitor to ask for the email that was sent, who was on the list, what the list was for, and what the further consequences would be for Curry's violation of the rules. The Monitor never responded to this email.

5. The *Lehman v. UAW* Lawsuit

On November 9, I filed a formal protest raising "serious concerns" that many members had reported lack of access to ballots and the failures with the Monitor's ballot requesting mechanism. I demanded "serious action" due to lower turnout and widespread issues with voting.

On November 11, I forwarded to the Monitor a letter from the Vice President of Local 1302 stating that multiple managers had been sent a ballot, while UAW members in good standing had not yet.

Also on November 11, I again forwarded additional members' problems with receiving ballots and reiterated concerns over exceedingly low turnout in the election. I demanded a 30-day extension of the deadline to request a new ballot and to postmark and receive ballots. I also demanded that "serious, effective measures finally be taken to notify the entire membership of its right to vote."

On November 11 at 9:30 PM, hours before the deadline ended to request new ballots, the Monitor wrote to me and told me to encourage voters to go to the Monitor's website to request a ballot. I replied indicating that I had been doing so for weeks, and forwarded reports from many UAW members who were not able to acquire a new ballot through the Monitor's hotline or webpage.

The same day, on November 11, the Monitor took down the mechanism for requesting ballots roughly 10 hours before the deadline expired at midnight pacific time on Friday, November 11. This effectively locked out countless workers who believed that they still had time to request ballots. Members who called the telephone hotline well before 8 pm heard the number ring endlessly while no representative picked up to take their request for a new ballot.

As of 5 pm on November 16, 48 hours before the recommended November 18 deadline to postmark ballots, only 94,184 votes had been received by the Monitor. At that point, the catastrophically low turnout in the election—the intended result of the conscious policies outlined above—began to come into focus.

Not receiving any reply from the monitor to my request for a 30-day extension, and with the deadline to receive ballots expiring on November 28, I filed a lawsuit under Title 1 of the Labor Management Disclosure and Reporting Act (the "bill of rights for union members") on

November 17. I requested that the voting deadlines be extended by 30 days and for emergency measures to be taken to inform the membership of the election, so as to mitigate the extremely low turnout.

In the lawsuit, I requested a preliminary injunction and temporary restraining order so that the 30-day extension could be put into effect immediately. This request was opposed by counsel for the UAW, by the Monitor, and by the Secretary of Labor, who was requested by Judge Lawson to respond to my request.

In the lawsuit, I warned: “If ballots continue to be sent at this rate each day through the November 28 deadline, total turnout will be roughly 104,000.” My prediction was extremely precise: as it turned out, a total of 104,776 ballots were counted.

As part of the lawsuit, I submitted affidavits and statements from dozens of workers regarding the lack of notice and problems obtaining ballots.

Halle Minor, for example, an autoworker and UAW member in good standing from Pottsville, Pennsylvania, explained that she asked her UAW Local 644 representative for a ballot on November 2 or 3 but still had not received one despite repeated requests..”On the shop floor, no one seems to know that an election is even happening,” she wrote.

Another UAW member, Lesley Johnson of Michigan, wrote: “I have not gotten a ballot and I requested one from the Monitor's website around October 28.” Johnson continued: “I know personally of one worker ... in my department, who hasn't gotten a ballot and there are many others all over the plant. A lot [of] Temporary Part Time workers (TPTs) haven't gotten ballots, and the UAW is not telling them [they] can vote and they are not telling retirees they can vote.”

“There are no notices in the plant about the election,” Johnson wrote. “The UAW was not telling anyone they could vote. I didn't know about the election until I met the Will Lehman campaign. I didn't know about the debate. No one at Mack knew. The UAW wasn't telling us. This is the first time we have had direct elections in the UAW and nobody knew about it. Even if I had a ballot, how can I be expected to think my vote had a meaningful impact when nobody even knew about an election?” Mr. Johnson was ultimately prevented from voting despite attempting to obtain a ballot.

Jacquelyn Gargile, who works at Stellantis' Warren Truck Assembly Plant and lives in Redford, Michigan, explained: “It's crazy how this election is so hush-hush. If we didn't see it on your flier [that is, my campaign's leaflet] a lot of us wouldn't know there is an election going on. There are a couple of flyers of people running in the plant but there is nothing about the process, who's running and their credentials posted anywhere in the facility.”

She asked: “How can an election count if most people never even heard an election is happening?”

John Deere worker Melissa Sorrells of Local 79 wrote: “It is Wednesday, November 16, and I have still not received a ballot. I have requested a ballot two times online ... A lot of people I talk to don't even know about this election, that's the sad part. They don't want anybody to know because they want Curry to win.”

Ultimately, following a hearing on November 22, District Judge David M. Lawson denied my request for a 30-day extension on the grounds that I lacked standing because I had received a ballot and because a remedy that affects the election as a whole has to be sought by the Secretary of Labor through the procedures under Title 4 of the LMRDA.

I believe that if my request for a 30-day extension had been heeded that the catastrophically low turnout could have been substantially mitigated. Nevertheless, in light of this ruling, filing this formal protest is now the only option available to me to contest the election results and seek a rerun of the election.

6. Rights Violations for Members Referenced in Original *Lehman v. UAW* Complaint

The full names of 31 UAW members were submitted by my campaign in federal litigation and the Monitor provided partial responses to whether those members were sent ballots, whether their requests for new ballots were received, and if so, whether they were sent subsequent ballots.

A review of these 31 members' attempts to vote show significant problems in the Monitor's process, as shown in Appendix A.

First, of the 31 members who wanted to vote, nine (29%) were not sent ballots in the first mailing, according to the declaration submitted by Matthew Fitch in the *Lehman v. UAW* suit.

Second, of the 22 members who were *sent* ballots, 19 (81.8%) did not receive them. Of the three who were sent and did receive ballots in the first batch, one of those votes was never counted (my own) and I do not know if the other two were counted or not.

This constitutes a violation of each of these workers' rights to vote, since workers should not have to jump through this many administrative hoops in order to vote. This figure also raises serious concerns about how many of the ballots sent to members were actually *received* by members. Extrapolating from this sample of the membership, hundreds of thousands of members likely never received a ballot at all.

Third, of the 21 members who requested new ballots, the Monitor only has a record of 17 members requesting new ballots. This means that 4 of the members (19%) who made a request for a new ballot never had their requests lodged by the Monitor.

Fourth, of the 17 members whose requests for new ballots *were* lodged, two members (11.7%) confirmed that they still did not receive ballots.

In other words, of the 31 members whose full names I submitted to the Monitor in my federal lawsuit as evidence of lack of reasonable access to the vote, I can only confirm that 9 of those members actually cast ballots. Importantly, I do not know whether any of those ballots were scanned and counted, but I know that mine was not. But 7 of the 31 were prevented from voting (22.6%) despite their diligent efforts. This is reflective of the unacceptably poor condition of membership data and of the processes in place to ensure members were able to vote.

J. CONCLUSION

Section 101 of the LMRDA (the “bill of rights for union members”) guarantees the right of union members to vote in elections, which includes the right to vote on an equal basis and in a meaningful manner. Section 401 of the LMRDA includes additional democratic guarantees regarding the conduct of elections.

On the basis of everything I have written above, I allege a violation, at a minimum, of the following provisions of the LMRDA:

- LMRDA § 101(a)(1) (equal rights and privileges);
- LMRDA § 101(a)(2) (freedom of expression and assembly);
- LMRDA § 401(a) (manner of election, secret ballot);
- LMRDA § 401(c) (distribution of campaign literature; prohibition against discrimination; inspection of membership list; safeguards to insure fair election);
- LMRDA § 401(e) (reasonable opportunity to nominate; voting and campaigning without interference or reprisal; notice of election; right to vote)

As a result of the inadequate notice and the other problems discussed above, I contend that UAW membership did not have a “reasonable opportunity” to vote as defined by 29 C.F.R. § 452.94, which provides: “The statutory protection of the right to vote implies that there must be a reasonable opportunity to vote. Thus, there is an obligation on the labor organization to conduct its periodic election of officers in such a way as to afford all its members a reasonable opportunity to cast ballots.”

In addition, the court-approved Official Rules of the election were also repeatedly violated, beginning with one of the “important principles” that framed the entire set of rules, namely the

“the broad education of members on the fact of the 2022 Election to facilitate as broadly as possible their participation in it.” As an indisputable fact, this principle was not realized in the election that just took place.

Rules 1-1 and 2-4, which more particularly describe the Monitor’s “oversight” role with respect to ensuring the membership is notified of the election, were violated in both letter and spirit by the Monitor’s ineffective enforcement of the notice requirement and by its failure to effectively counteract the intentional efforts by the entrenched UAW leadership to suppress the vote.

Rules 2-3 through 2-7, which set forth the schedule and procedure for mailing and receiving ballots, were violated when substantial numbers of members did not timely receive notice of the election or ballots. Rules 2-5 and 2-10, which pertain to eligibility to vote, were violated when my valid ballot was not counted together with the ballots of an unknown number of other members.

Rule 2-13, which protects ballot secrecy, was invaded in the manner described above by UAW officials affiliated with the Curry faction and by the Monitor’s ineffective enforcement.

Rule 4-4, which guarantees freedom to advocate, was violated by acts of intimidation directed against me and members speaking with my campaign. Rule 4-5, which prohibits discrimination, was violated by the discriminatory manner of giving notice of the election, which favored the entrenched officialdom over the rank and file, and which excluded in particular academic workers.

Rule 4-7, the right to access the global mailing list, was violated in effect by the union’s failure to maintain an accurate list. Rule 4-10, the right to inspect that list, was violated in the same manner. Rule 4-11, which guarantees access to a list of delegates at the convention, was violated as described above when I was denied access to that list.

Rule 4-13 provides that the candidate forum will be “fair, honest, open.” This rule was violated when the moderator of the forum emphatically attributed a false quote to me and refused to correct it. This rule also contemplates that Monitor will “broadly publicize notice of the forum to the Union membership,” which did not happen.

Rule 5-1, as described above, was violated by the disenfranchisement of TPT workers, who were told they could not vote and that they should not cast ballots even if they received them in the mail.

To the extent that these violations occurred prior to the counting of ballots, I timely protested those violations to the Monitor in writing in each case after I became aware of them, and those protests are collected in the attached exhibit.

All the issues I have raised above, taken together, clearly affected the outcome of the election. The “winners” of this election each earned less than 4 percent of the vote. The participation of a mere additional 10 percent of the 90 percent of the membership that did not vote—let alone the entire million who did not vote—could have easily swung the result sufficiently to place my name in the top two. Any increase in the number of rank-and-file voters participating in the election would have decreased the relative weight of the vote of the officials, which are likely to have favored the incumbents, and increased the vote for me.

The fact that the UAW leadership worked so deliberately and systematically to minimize the turnout among rank-and-file members confirms, in the negative, that the outcome of the election was at stake. The entrenched UAW leadership, which feared and opposed a direct election, was worried that it would be voted out.

An election in which 1.1 million UAW members received genuine notice of the election and of the issues at stake—and in which rank-and-file members like me could freely reach my union brothers and sisters at the factory turnstiles, by email, and by mail without intimidation or interference—would have been a different election altogether. It would have been an election in which the real issues confronting workers could have been discussed openly and without retaliation, in which the “culture of corruption” that was exposed by the Justice Department investigation could have been fully confronted, and in which a new leadership could emerge that was genuinely reflective of the demands and aspirations of the members.

This was not the election that happened. But it is not too late to change course and conduct the election that the rank-and-file deserved. Nobody serious about union democracy can be happy with the 9 percent turnout.

If the UAW was a country, would it be called a democracy? At 9 percent, turnout is approximately half the turnout of the country with the lowest turnout for national elections in the world, Haiti (18%). It is lower than voter turnout in all of the countries that *The Economist's* Democracy Index classifies as “authoritarian regimes.”

Rule 9-4 provides that for the violation of the official rules or of any legal rights of members, “remedies” can include “certifying or refusing to certify the results of any election” and “ordering the rerun of any nomination or election, or any portion thereof.” On the basis of this provision, I am requesting that the election results not be certified and the election for the office of international president be “rerun.”

Rule 9-4 also provides, as a possible remedy, “placing a Candidate on the ballot or removing any Candidate from the ballot.” On the basis of this provision, in the alternative, I am requesting that my name and the names of the other candidates be placed on the “runoff” ballot.

In either case, I am requesting on behalf of the entire rank and file of the UAW—including the one million of my rank-and-file brothers and sisters who were left behind by this election, whether they would have voted for me or not—that this time the union and the Monitor must provide *actual* notice of the election to the *entire* membership, without favor or discrimination, so as to provide the entire membership with a meaningful opportunity to express its democratic will.

Thank you,

Will Lehman
Member, UAW Local 677



WillforUAWpresident@gmail.com

APPENDIX A: BREAKDOWN OF MEMBERS REFERENCED IN *LEHMAN V. UAW*

<p>Green: member cast ballot Red: member prevented from casting ballot Orange: unknown</p>	1. Was member sent ballot in original batch per Monitor?	2. Did member actually receive ballot in original mailing?	3. Did member request new ballot?	4. Did Monitor have a record of this request?	5. Did member receive ballot after requesting?
Melissa Sorrels	Yes	No	Yes	Yes	Unknown
Tom Bauer	Yes	No	Yes	No	No
Alexander Novokhodko	Yes	No	Yes	Yes	Yes (but unclear if in time to count)
Ebony Sewart	Yes	No	Unknown	No	n/a
Becky Sutherland	Yes	No	Unknown	No	n/a
Douglas Louthan	Yes	No	Yes	No	n/a
John Maser	Yes	No	Yes	Yes	No
Paul Rhoades	Yes	No	Yes	Yes	Yes
Grace Mangum	Yes	No	Yes	Yes	Unknown
Torin Perreyclear	Yes	No	Unknown	No	Unknown

Delores Goodson	Yes	No	Unknown	No	Unknown
Tina Hyland	Yes	No	Unknown	No	Unknown
Katheryn Quijada-Polanco	Yes	No	Unknown	No	Unknown
Nathan Marshall	Yes	No	No (heard about election after deadline)	No	n/a
William Decker	Yes	No	Yes	No	Yes
Craig Harvey	Yes	Yes	n/a	n/a	n/a
Frank T. Hensley	Yes	No	Yes	Yes	Unknown
Ed Baum	Yes	Yes	n/a	n/a	n/a
Halle Minor	Yes	No	Yes	Yes	Yes
Jacquelyn Cargile	Yes	No	Yes	Yes	Yes
Lesley Johnson	Yes	No	Yes	Yes	No
Will Lehman	Yes	Yes (but vote not scanned)	n/a	n/a	n/a
Lonny Acker	No	n/a	Yes	Yes	Unknown
Ted Bey	No	n/a	Yes	Yes	Unknown
Tiffiney Wiley	No	n/a	Yes	Yes	Unknown

John Brooks	No	n/a	Yes	Yes	Unknown
Jennifer Brown	No	n/a	Yes	Yes	Yes
Rory Dolan	No	n/a	Yes	Yes	Unknown
Dora Rodriguez	No	n/a	Yes	Yes	Unknown
John Meyers III	No	n/a	Yes	Yes	Unknown
Cory Plock	No	n/a	Yes	No	n/a
31 members	29.0% not sent ballot	81.8% who Monitor claims were sent ballot did not receive it		Monitor claims not to have received new ballot requests from 19% of members who requested new ballots	11.7% of members whose requests for new ballots were lodged never received ballots

APPENDIX B: COMMENTS BY MEMBERS IN DECEMBER 2022 SURVEY

<p>We were never informed about the election, I did not know about the election until I met Will's campaign. No one from the UAW said.</p>
<p>There just wasn't nearly as widespread conversation in regards to the election in my opinion</p>
<p>When I contacted the monitor via phone and online I was told that they were no longer issuing ballots.</p>
<p>I am a Supplemental. We were told that TPTs could not vote. Only learned we could from Will. We should have been educated by UAW. I think UAW at WTAP want Curry.</p>
<p>Never received a ballot, She recently changed her address but filled out a forwarding address form, but nonetheless didn't get a ballot. She just went to the local to make sure that her new address is on the local database.</p>
<p>I asked several times for ballot!</p>
<p>I never received my ballot, and I am not sure who was even supposed to inform me? I found out very late about the vote on Facebook, but what if I didn't have social media? And we don't have TPTs at my plant.</p>
<p>That nobody from the UAW was communicating anything to us about about the election, or about the jobs we're losing. We do not answers from the UAW, we look to social media for our information.</p>
<p>All I can see is the union should have done more to inform the workers about the election.</p>
<p>I feel that the change of the process for voting really caused a lot of confusion. It should have been left for the Delegates to vote. Depending on individuals to vote was an entire disaster. Just my personal opinion.</p>
<p>I received my ballot before I received any information from Local 653. I never received a ballot about the Referendum last year.</p>
<p>I was only informed of the election from a few coworkers who posted posters but was not told anything about the debate or anything about the election from the UAW.</p>
<p>From my perspective we were informed through a few candidates and local publications.</p>
<p>I know of several workers in my shop who never received a ballot. They heard about the election, but never received a ballot.</p>
<p>I want to make sure that all sections of the voting process are investigated of all UAW members regardless workplace or industry are investigated.</p>
<p>None of us knew about the election.</p>
<p>Got my ballot very late</p>

The only way I knew anything about the election was my boyfriend received his ballot, but did not know who to vote for because he didn't know anything about the people on the ballot!

I called my local and reached my former committee woman to ask if retirees were eligible to vote and she said she's not supposed to talk about it, and told me to call the Chairman. He told me he wasn't sure if retirees could vote, but he would check. I told him I am eligible. How and when will I get my ballot? I called the International who told me they didn't know, that I should ask the monitor. I knew that before I called any of them, but I wanted to see what they would say.

I called a local 659 union rep and asked about the ballots and whether retirees could vote and was told I would have to talk to the chairman. Then called chairman and was told he would have to get back to me.

You don't want to know what I think .

I am only aware that many I've spoken to DID NOT receive ballots.

What the UAW is doing is not substantive. They're (UAW and companies) using workers to get what they can out of them.

She is on the election committee and didn't hear anything about the election; possibly received a ballot but thought it was junk mail.

I agree with Will, there should have been more information on and how to watch the debate between the Candidates. Also, more information on why we are all able to vote in this election and why. The leadership just tries to hide the truth to stay in power. I know more UAW people would have voted if they had the information mailed and emailed to them. The UAW as a whole need to be more transparent about our elections from now on. I believe that Will has the right stuff to lead the UAW membership.

Only after verifying my info with my local fin sec was I able to request a ballot. Mind you my info has never changed since I started working here. After requesting a ballot I didn't receive one. I requested another one. After waiting for several weeks I finally received a ballot one day before the deadline. I filled it out and returned. Then, 3 days later I received another ballot which to me looked to be 2 separate ballots coming from 2 separate locations. Only one of the ballots had a tracking number which I could verify was received. I took pictures of said ballots for my personal record. Of course I only returned one which was the first one I received one day before the deadline. I still have the other in my possession. I'm happy to submit those pictures to you. You have my correct email address.

The union doesn't do enough to inform the membership.

I want a fair election just as anyone does. I find your survey incomplete as the multiple choice answers do not give the chance for answering with anything other than Yes or no.

It was already known that the number of people voting would be small. Retired people make a large portion of the non voters.

The antics of the top leaders has created this separation from involvement by the average member. If local union officers and appointees were not required to attend monthly meetings and the Labor Day parade, the union would find it difficult to operate.

Any new idea such as having a union goes through a cycle. Think of the cycle as a circle. The UAW is at low ebb. A new idea for the Union is the way national officers are elected. The question is how to keep the leadership connected to the average person.

I went to Labor Day parades in Detroit. One time I shook the hands of the top leaders just to tell myself that I had actually been that close to those people. Some of those people went on to kill their wife, spend money illegally gotten from the union and are in jail now. Was it worth it to them? To their families? The solidarity of the union is obviously not forever.

The Feds have never favored Union Democracy.

We need people who are willing to fight for us.

Stop using UAW 'picks' for Monitoring and UAW Hotline complaints. Go outside The Big 3 and UAW walls, so the public hears and knows about the decades of backroom deals and their 'secret', toxic, hostile, and domestic terrorism (in-plant) workplaces.

Local union didnt do anything to tell us about election...all we had was shop talk in the floor

Our local or stewards never mentioned the election

There was little to no discussion from the union or among union members about the election. The one mailing I received simply stated who our local was supporting for the election.

They always make sure to get my dues, but did not inform me of the election.

The only reason I knew about the election was from Facebook, the only avenue was through Facebook and the ballot coming through the mail, I voted. There are many Facebook groups for autoworkers and that is where I heard about the election.

I know 3 other UAW members and they all said that they received ballots, I don't know if they voted or not.

I've been told to deactivate my Facebook account by a UAW Local 1250 chairman, which I did, so I don't get any information. My termination was related to a Facebook post, so they told me to deactivate it.

I did not see any information on the International UAW internet page about the election.

I did not receive any emails with information about the election. I did not receive any emails from Will or any of the other candidates.

I did receive the Solidarity magazine in the past. The last one received was in 2020. I guess when you are terminated, they cut you off.

I do know about the Local Union Information System. I don't have access to it. I know it is in the constitution, and they keep everyone's names and contact information. I've made sure that my information is accurate and up to date.

I've even made sure that another sister's information is up to date because I've had problems with another sister whose information was not up to date. I have two union sisters who I've helped keep their information up to date.

Yes, they have a way to reach out to me. Other than the ballot from the union, that is the only thing about the union election that I received in the mail.

I never received emails, I get text messages from the UAW, I can't speak on 100% certainty, but I can't think of anything about the election of international office.

I've received absolutely nothing from the local. I used to receive information bulletins, but those are reserved for people who are workers.

I am a member in good standing. I feel as if I've been quarantined, people who have associated have stopped since I was terminated, I am not in loop.

I sent multiple emails requesting to receive my ballot starting in October! They went unanswered. Then I called the monitor hotline and left a voicemail. I stated I was part of 9A, my name and my address. I finally received a ballot just a few days before the deadline, and it didn't have anything about 9A, as I wanted to vote for Brandon Mancilla. I tried calling again but it was too late. I mailed the ballot I had and wrote in 9A. It didn't make it before that crazy deadline of Monday after Thanksgiving! (Who has time to go to the post office the week before Thanksgiving!) So I don't know if my vote was counted, I assume not. Luckily Brandon was elected, so I'm at least happy with that.

I did explicitly request a ballot before the deadline for requesting ballots had passed, I was told I would receive it within the next few days but never got one, hence I was not able to vote. I would have voted for Will Lehman if I could have.

I need to have a ballot mailed to my home address. Part-time music history faculty doesn't have mailboxes, as far as I know, or an email link to a ballot.

I believe, the UAW is political and corrupt. Our contract was voted on in June 2022. International according to our local officers, said we could not strike, even after a strike vote passed. The local had another vote on the contract, it passed this time just barely, went something like 397 for to 351 against, but was posted that 414 people did not cast a vote. Smells like a pile of BS to me. I think if you're not in their good ole boys club, you can not be heard, or have a chance.

If not for William me or no man me from my unit would have know about the Election.

I'm a retiree, I had to request a ballot twice before I did receive a ballot.

I only knew about the election because the leadership going to prison was in the news. I received a ballot but many people I know had no idea an election was happening.

I made sure my contact information was up to date before this election, and I know it must have been correct because I was able to vote in the previous election (voting to have direct elections) and I hadn't moved since then. However, I did not receive my ballot until very late for this election. After waiting so long for one, I requested a ballot online on 11/8. I did not receive the ballot until 11/19. I still completed it and sent it in the next day, hoping it might be counted. No idea if it got counted or not, but I'm not hopeful, since my local was telling me that I needed to mail it back by 11/18 to make sure it would get counted. I'm frustrated that I was denied my right to vote.

I did receive a ballot but didn't even realize I had received it until it was too late to submit. It was a plain white envelope and it blended in with all of my mail.

I was confused that I hadn't received a ballot yet despite confirming (and never needing to change) my address, so I requested a new ballot to be sent to me -- I forget exactly when that was, but I believe it was on the same day as the cut-off deadline of Nov 11. My original ballot AND the requested new ballot both showed up on the same day -- both after Nov 18, the UAW's recommended deadline for returning the ballot. They were both postmarked Nov 15. I returned one in hopes that my vote would be counted, but I've no clue whether it made it back in time.

I requested a ballot but it didn't arrive until after the latest mail-by date for counting.

I and others I know had to call the monitor and formally complain to get ballots. The "request a replacement ballot" form wasn't enough.

I have a lot more to say. Answering these questions upset me so much that my back hurts, and I will probably have to take my prescribed anxiety medication.

I did not find my mailed ballot until after the deadline passed, so I did not vote.

Nothing, I took it upon myself to do my own homework.

I actually approached two committeemen and asked them what they knew about the election in early November. Both of these people had extremely little information on it. They said they knew it was happening but didn't know more than that.

I received my ballot, I voted, and I voted for will. Everyone I asked, some said they received a ballot and throw it away, others voted and some said that they did not receive the ballot.

I asked one person today (Monday December 12), and he told me that he did not get ballots.

I would think that our local would post information about the election. I did not see any.

There are many way to contact: emails, texting, we have the OneCall that they can use to let us know about things. It will text or email us with updates.

I get a text and an email on everything. We have a union meeting on Thursday, we get notified of things going on in our local, it is called the one call, that is how the union notifies us. I can't guarantee that they have everyone's phone number and email, but we were asked to supply it. They should have notified everyone that an election was coming up. Why not know about the international election?

I never received a text message or an email about the election.

We have a union meeting on Thursday, I will ask at the meeting to see how many got ballot.

There are also union board in every break area. There are different boards, but there is one dedicated to the union. I don't go in every break area, but I do get around the plant and in my break area and in the other ones that I've been in I have not seen any sign anywhere reminding people to vote.

I've asked people did you get your ballot? Some say "I throw it away," One peoson today said they did not receive a ballot.

I talk with a lot of people in the fabrication area.

Facebook , I not a big Facebook person, I use it for our family. But I did not get any messages from about the elections.

I didn't get any emails from the international. The way I found out about Will was I looked at my ballot and I knew I didn't want to vote for the Curry team. I looked up all the other people and what Will was saying was closest to what I think.

We know that there is a lot of corruption at the International, but they didn't get them all.

I do receive the solidarity magazine,

I do not know what the Local Union Information System is unless that is the OneCall.

I did not receive any of the emails from Will, only way I found out about Will was when I got my ballot, and I started looking up the candidates.

Curry came through, about a month before the election, took a quick tour of the plant, his entourage and our local members didn't hear of any campaigning for the elections when he was here.

I didn't receive my ballot until I was already away for Thanksgiving, so I wasn't able to vote in time for the deadline.

they all belong in jail. they were all a bunch of low down crooks.wander what WALTER RUTHER WOULD DO.


Once I saw your email I made sure to register to get a ballot mailed to me before the deadline and I still never received one

Ballots were counted based on the date *received* via US mail, not the date postmarked. I live in Washington, a vote-by-mail state, where ballots for government elections are always counted based on the date *postmarked*. I don't have any control over how fast the mail is, but I can control when I take my ballot to the post office. The UAW election biases the outcome against late voters. I believe my UAW ballot might not have been counted because I sent it on the Friday before the deadline (11/25).

APPENDIX C: MAILERS THE UAW SENT ME IN THE WEEKS BEFORE THE NATIONAL MIDTERMS

**SUSAN WILD
FOR CONGRESS
RESULTS THAT WORK FOR US**


UAW members, retirees, and our families all want the same thing: the freedom to live our lives the way we want.



Not saddled by low wages,¹ held back because our health care has strings attached,² or worried about if our retirement will be there for us.³

Our union has done the research, spending hours looking at votes, statements, policy positions, and more.

How you vote on November 8th is your decision, but **the UAW believes that Susan Wild is the ally our families need in Washington to make sure we protect the freedom we have to shape our futures on our terms.**







**Election Day Is
November 8**

**Make Sure Your
Voice Is Heard**

AT&T CONTRACTS 1) Wildforcongress.com/jobs-economic-prosperity-and-labor-rights-0; 2) Wildforcongress.com/health-care; 3) Wildforcongress.com/leaders

YOUR VOTE IS YOUR VOICE. LEARN MORE:

 UAWEndorsements.org
 UAW International Union
 UAW.org/Action
 Text* "2022" to 99795

* By texting this number, you agree to receive periodic messages from the International Union, UAW. Message and data rates may apply. UAW2019_7901 © 2022 UAW

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**WE'RE
BUILDING OUR
FUTURE
TOGETHER.**



**How You Vote Is Your Decision,
But Your Vote Is Your Voice**

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THE ROADMAP FOR YOUR LIFE SHOULD BE UP TO YOU

UAW

On Nov. 8th, How You Vote Is Your Decision – Just Remember, Your Vote Is Your Voice.

SUSAN WILD FOR CONGRESS

VOTE "NO" ON LISA SCHELLER

HELPING US SET OUT FOR THE FUTURE WE WANT

Wild will work for us to hold CEOs accountable, lower inflation, expand affordable health care options and ensure that working families can afford to live on their own terms.

A BUMPY RIDE FOR UAW MEMBERS AND THEIR FAMILIES

doesn't support the Inflation Reduction Act,¹ sides with corporate profiteers,² and sides with anti-union extremists to take away our freedom to organize for better wages³ and make our own health care decisions.⁴

YOUR VOTE IS YOUR VOICE. LEARN MORE:

UAWEndorsements.org UAW International Union UAW.org/Action Text* "2022" to 99795

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UAW

Which Candidate HITS THE MARK?

Your union has done the research on the issues that matter - retirement, wages, inflation, and more. And only one candidate for U.S. House hits the bullseye for UAW members, retirees, and families...

Election Day Is November 8

UAW

UAW

THE UAW ENDORSES

On-Target Results For UAW Members, Retirees, and Families

SUSAN WILD For Congress

Wild knows that our families need results from Washington - not more hot air. **Wild** is helping protect our pensions, 401(k)s and retirement security, lowering the cost of prescription drugs for seniors on Medicare, and making sure big corporations pay their fair share.

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SHE'S DONE HER HOMEWORK SO HAS YOUR UNION

How you vote is your decision. However, the UAW has done the research on the candidates' positions, records, and statements on key issues, and brings you this non-partisan voter guide to inform you as you exercise your voice this November.

YOUR VOTE IS YOUR VOICE | ELECTION DAY IS NOV. 8TH

Messages from the International Union, UAW. Message and data rates may apply.

YOUR OFFICIAL 2022 UAW VOTER GUIDE

Offered as a service to UAW members, retirees, and their families.

THE ISSUES:	JOHN FETTERMAN For US SENATE	JOSH SHAPIRO For GOVERNOR	MEHMET OZ For US SENATE	DOUG MASTRIANO For GOVERNOR
Protecting the stable and secure retirement we've earned	✓	✓	✗ ¹	✗ ¹
Easing the pressure of health care and prescription costs	✓	✓	✗ ²	✗ ²
Defending our freedom to join a union	✓	✓	✗ ³	✗ ³
Preserving our freedom to make our own health care choices with our doctors	✓	✓	✗ ⁴	✗ ⁴

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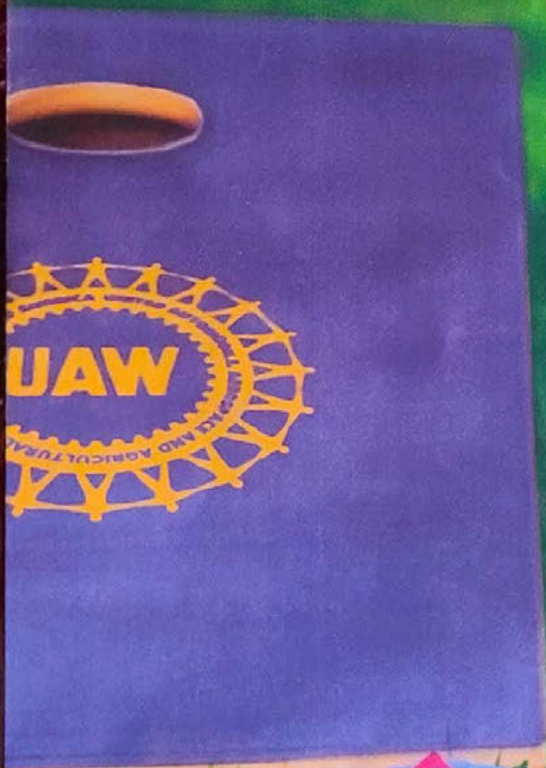
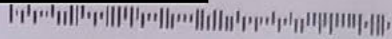
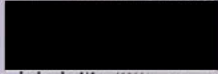


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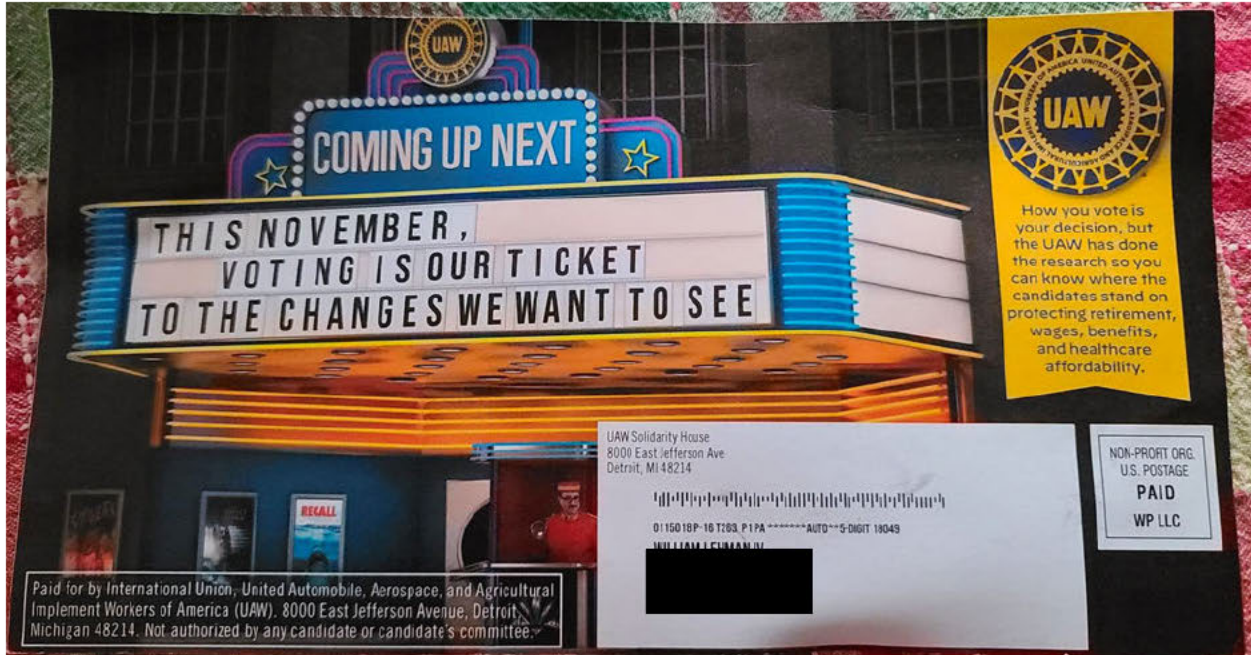


**UAW
FAMILIES
KNOW**
**FREEDOM MEANS
LIVING YOUR LIFE
ON YOUR TERMS**

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* By texting this number, you agree to receive periodic messages from the International Union, UAW. Message and data rates may apply.



COMING UP NEXT

**THIS NOVEMBER,
VOTING IS OUR TICKET
TO THE CHANGES WE WANT TO SEE**


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YOUR UNION ENDORSES...



**STARRING!
JOHN FETTERMAN
FOR US SENATE**

AND



**STARRING!
JOSH SHAPIRO
FOR GOVERNOR**

**FREEDOM
TO CHOOSE THE LIFE
THAT'S BEST FOR YOU
AND YOUR FAMILY**

Fetterman and Shapiro will work every day to help working families live their lives without being restrained by poor wages, rising costs, and threats to their way of life.¹

**KNOWING
THAT YOUR RETIREMENT
WON'T END UP ON THE
CUTTING ROOM FLOOR**

Fetterman and Shapiro will protect Social Security, 401(k)s, and pensions and make sure big corporations can't take away what UAW members have worked so hard to earn.²

**KEEPING
OUT-OF-CONTROL
HEALTHCARE COSTS
FROM SPOILING THE ENDING**

Fetterman and Shapiro will fight to lower prescription costs and health care premiums,³ so you can spend more time with your family and less time worrying about medical bills.

CO-STARRING
THE FACTS: 1) <https://thehill.com/policy/healthcare/539204-pa-senate-candidate-fetterman-on-backing-15-minimum-wage-thats-a-bit-lazy-would>; <https://joshshapiro.org/policy-jobs/>; 2) facebook.com/JohnFettermanPA/posts/2861975450737962/; umwa.org/news-media/news/state-ig-shapiro-hears-pension-concerns-retiree-minors-youth-unions-try/; 3) <https://johnfetterman.com/issue/respecting-our-seniors/>; <https://www.attorneygeneral.gov/taking-action-ig-shapiro-stops-price-gouging-at-perm-jersey-paper-company-in-philadelphia-gets-restitution-for-rppd-4f-consumers/7b6c1d-lwAR36v0T12uVgE8My2-Evnl70r/41HKZx6Je80zIqJf-af340ASq1aFQ>

YOUR VOTE IS YOUR VOICE. LEARN MORE:

UAWEndorsements.org UAW International Union UAW.org/Action Text* "2022" to 99795

* By texting this number, you agree to receive periodic messages from the International Union, UAW. Message and data rates may apply. UAW2015_PA © 2022 UAW

APPENDIX D: SAMPLE OF UAW “GET OUT THE VOTE” EFFORTS IN MIDTERM ELECTIONS



**Meet The
Candidates
Night**

Please Join the Toledo Area
UAW CAP Council
October 17, 2022 at 5:00 PM
UAW Local 12 Parlor A
Come meet with and hear from UAW
endorsed Candidates for the
November 8, 2022 General Election
FOOD AND REFRESHMENTS WILL BE PROVIDED



Region 1D Director Steve Daws explains importance of voting in the midterm



Midterm GOTV event at UAW Local 578 in Wisconsin



GOTV RALLY WITH BIG GRETCH!

AND SPECIAL GUESTS!!!

NOVEMBER 3, 2022

DOORS OPEN: 4:45PM

WARREN- UAW Region 1 HQ

MEET GOVERNOR GRETCHEN WHITMER & FRIENDS IN WARREN!



Join us as we hear from Governor Whitmer on her plans to keep getting things done and fighting for ALL Michiganders. Protecting fundamental rights, investing in education, growing our economy, fixing the damn roads—she's tackling the big challenges Michigan faces with bold solutions and decisive leadership. Tough times call for tough people: Gretchen knows that our best days are ahead of us, and will never stop fighting for you and your family.

****no large bags in this event****

2022 General Election Day Volunteers

Please fill out the information requested to volunteer on Election Day, November 8, 2022.

willforuawpresident@gmail.com [Switch account](#)

* Required

Email *

Your email

Name *

Your answer

Phone Number *

Your answer

What polling location would you prefer to volunteer at on Election Day? Please check boxes below. *

- ALDERSGATE UM CHURCH
- ALVA N SIDLE AMERICAN LEGION POST
- ANTHONY WAYNE HIGH SCHOOL
- ARBOR JR HIGH SCHOOL
- BELIEVE CENTER
- BEVERLY ELEMENTARY
- BOWSHER HIGH SCHOOL
- BYRNEDALE ELEMENTARY

Exhibit 1



William Lehman <willforuawpresident@gmail.com>

Fwd: UAW Monitor - Elections Question

4 messages

William Lehman IV [REDACTED]
To: "willforuawpresident@gmail.com" <willforuawpresident@gmail.com>

Tue, Jul 12, 2022 at 1:31 PM

----- Forwarded message -----

From: **UAWMonitor_Election** <uawmonitor_election@stoneturn.com>
Date: Tue, Jul 12, 2022, 2:24 PM
Subject: UAW Monitor - Elections Question
To: [REDACTED]
Cc: UAWMonitor_Election <uawmonitor_election@stoneturn.com>

Hello Mr. Lehman,

Thank you for reaching out to the Monitor. Upon receiving a Candidate Declaration Form, the Monitor promptly begins the vetting process described in Section 3-2 of the Rules, available on the Monitor's website at www.uawmonitor.com/elections. Because the length of this vetting process can vary considerably, the Monitor is unable to provide an estimate as to completion; nonetheless, the Monitor will communicate his determination to the candidate as soon as possible.

Please note that as soon as the Candidate Declaration Form is submitted, so long as on the face of the Form the Candidate appears to be eligible for International Office, the Candidate will be considered a Bona Fide Candidate. The Candidate will thus be permitted access to the Global Mailing List and other benefits of such status during the period of time that the Monitor, in conjunction with the UAW, conducts the full vetting process. A Bona Fide Candidate's status will only be revoked upon a determination by the Monitor that that individual is ineligible to run for office. Any questions or uncertainty regarding eligibility under the criteria described in Section 3-1 of the Rules and attested to on the Candidate Declaration Form may be directed to the Monitor at UAWMonitor-Election@jenner.com or 212-303-2529.

Best,

UAW Monitor Elections Team

Will for UAW President <willforuawpresident@gmail.com>
To: uawmonitor_election@stoneturn.com
Cc: [REDACTED]

Tue, Jul 12, 2022 at 1:38 PM

Thank you for this clarification.

Could you let me know:

1. How I can access the Global Mailing List
2. How I can get the full list of UAW locals and delegates to the convention?

Sincerely,
Will Lehman

[Quoted text hidden]

Will for UAW President <willforuawpresident@gmail.com>

Wed, Jul 13, 2022 at 2:50 PM

To: UAWMonitor-Election@jenner.com, uawmonitor_election@stoneturn.com

Cc: [REDACTED]

Thank you for your notice that I have been approved as a bona fide candidate. I just wanted to follow up on this email from yesterday. I am looking for the information on how to access the global mailing list and the list of delegates. Please let me know as soon as you can.

Thank you for your time,

Will Lehman

----- Forwarded Message -----

Subject:Re: UAW Monitor - Elections Question

Date:Tue, 12 Jul 2022 14:38:31 -0400

From:Will for UAW President <willforuawpresident@gmail.com>

To:uawmonitor_election@stoneturn.com

CC [REDACTED]

Thank you for this clarification.

Could you let me know:

1. How I can access the Global Mailing List
2. How I can get the full list of UAW locals and delegates to the convention?

Sincerely,
Will Lehman

From: UAWMonitor_Election <uawmonitor_election@stoneturn.com>

Date: Tue, Jul 12, 2022, 2:24 PM

Subject: UAW Monitor - Elections Question

To: [REDACTED]

Cc: UAWMonitor_Election <uawmonitor_election@stoneturn.com>

Hello Mr. Lehman,

Thank you for reaching out to the Monitor. Upon receiving a Candidate Declaration Form, the Monitor promptly begins the vetting process described in Section 3-2 of the Rules, available on the Monitor's website at www.uawmonitor.com/elections. Because the length of this vetting process can vary considerably, the Monitor is unable to provide an estimate as to completion; nonetheless, the Monitor will communicate his determination to the candidate as soon as possible.

Please note that as soon as the Candidate Declaration Form is submitted, so long as on the face of the Form the Candidate appears to be eligible for International Office, the Candidate will be considered a Bona Fide Candidate. The Candidate will thus be permitted access to the Global Mailing List and other benefits of such status during the period of time that the Monitor, in conjunction with the UAW, conducts the full vetting process. A Bona Fide Candidate's status will only be revoked upon a determination by the Monitor that that individual is ineligible to run for office. Any questions or uncertainty regarding eligibility under the criteria described in Section 3-1 of the Rules and attested to on the Candidate Declaration Form may be directed to the Monitor at [REDACTED] or 212-303-2529.

Will for UAW President <willforuawpresident@gmail.com>
To: UAWMonitor-Election@jenner.com, uawmonitor_election@stoneturn.com
Cc: [REDACTED]

Thu, Jul 14, 2022 at 11:34 AM

Hello again,

I haven't heard back yet on how to use the email list for delegates. This is very important for me, as the convention is coming up soon. I would like to have the following letter sent to the delegates. Could you let me know how and when this can be done?

Thank you,
Will Lehman

To UAW Convention Delegates:

My name is William Lehman. I have been employed for five years as a Mack Trucks worker in Macungie, Pennsylvania. I am running for president of the UAW International.

The court-appointed Monitor has accepted as valid my declaration of intent to run for president. To appear on the ballot in the elections, however, I must be nominated at the UAW Convention, which begins on July 25. I am asking you to nominate me so that I can present to UAW members in the upcoming election a real alternative—based on the defense of workers' class interests—to the corrupt Solidarity House apparatus that functions as an industrial police force acting on behalf of the corporations.

The corruption scandals of the last several years have exposed the unbridgeable chasm between the Solidarity House apparatus and the union rank and file. In fact, direct elections are being held for the first time only because past UAW presidents and other high-level union executives were indicted and convicted of stealing workers' dues money and accepting bribes to sell us out.

The corruption has not been a case of "a few bad apples." A healthy organization does not fall prey to criminals. The corruption of the union is inseparably connected to the UAW bureaucracy's subordination of union members' interests to the corporate drive for profit. The taking of bribes from the auto companies is only the most extreme and criminal expression of Solidarity House's collaboration with the corporations and the betrayal of the workers it falsely claims to represent.

For more than four decades—starting in 1979 with the UAW's acceptance of concessions as a condition of the bailout of Chrysler—the Solidarity House apparatus has turned the union into a pro-corporate police force. All its efforts are directed toward collaborating with the corporations to maximize their profits. Toward this end, the UAW uses the vast resources of the union to suppress every form of rank-and-file resistance to corporate exploitation.

Concessions contracts have become the norm. Every basic principle of working-class solidarity with which unions were originally associated have been abandoned. The union enforces a tier-system of wages that makes a mockery of unity. Strikes, the most essential weapon of struggle against corporate greed, have been suppressed for decades. And in the rare instance when they cannot be prevented, Solidarity House—determined to preserve the strike fund as its personal property—places strikers on starvation wages.

For the rank and file, the entire policy pursued by the UAW over 40 years has been a catastrophic failure. The wages, working conditions and benefits of workers have declined, year after year and contract after contract.

I am running based on a program to transfer power to the rank-and-file. The time has come to break up the apparatus whose payroll runs into the tens of millions of dollars annually. Hundreds of individuals on the Solidarity House payroll receive six figure salaries. They live comfortable lives, totally remote from the real-life experience of the hundreds of thousands of UAW members who struggle day after day to make ends meet.

It is necessary to end all the UAW-corporate bodies, such as the "joint training programs," that have served as slush funds for the apparatus. The resources built up with the dues money of workers must be under the control of the workers themselves, to assist us in our struggles. The decisions of this organization affect the lives of millions of people, including our families. They should not be made in secret meetings with the companies, but democratically, on the shop floor, for all to see.

Official inflation has now reached 9 percent, and the reality is worse than that. Workers can't afford these increases to gas, rent and food expenses under the sellout deals forced through by the apparatus. We need massive pay increases, Cost-of-Living Adjustments (COLA), an end to tiers and full funding of pensions for all retirees, no matter what. We don't care what the company says it can afford, this is what our families need.

As a critical element of this struggle, we must unite with our class brothers and sisters throughout the world, and reject the nationalist perspective that the UAW has promoted, which has secured neither our jobs nor our working conditions. There are massive strikes and protests throughout the world over the same issues we confront.

It is imperative that in this election workers have a real choice, that there is as broad a field of candidates as possible. In an earlier period, there were real alternatives reflecting the views of the rank and file and different political tendencies. This democratic tradition was stamped out long ago, which freed the way for the bureaucracy to implement its disastrous course.

My appeal is to those of you who recognize the dead end into which this apparatus has led UAW workers, and who will therefore support the right of workers to vote for me this October and November.

I ask for your support, not on my behalf as an individual, but to restore the democratic rights of the rank and file and place in their hands real control over the UAW.

For more information on my campaign, you can visit my website at WillForUAWPresident.org or write to me at willforuawpresident@gmail.com.

[Quoted text hidden]



William Lehman <willforuawpresident@gmail.com>

Letter to UAW Global list

2 messages

Will for UAW President <willforuawpresident@gmail.com>

Fri, Jul 15, 2022 at 9:20 AM

To: uawmonitor_election@stoneturn.com, UAWMonitor-Election@jenner.com

Cc: willforuawpresident@gmail.com

Dear Monitor:

Since Tuesday I have tried to contact you via email and phone to request that you send a communication to the UAW membership as is my right under Section 4-7 of the 2022 UAW Election Rules. I have not heard back, even though time is of the essence and the UAW convention is now only 10 days away. Already, the delay is costing my ability to win support from delegates. Please send the following to the UAW global email address today, at a reasonable hour of the day.

Thank you for handling this promptly,

William Lehman

* * *

Subject Line: Why I'm Running for UAW President: To Transfer Power to the Rank-and-File

Dear UAW workers:

My name is William Lehman. I have been employed for five years at Mack Trucks in Macungie, Pennsylvania. I am running for president of the UAW International.

The court-appointed Monitor has accepted as valid my declaration of intent to run for president, and I'd like to tell you why I am running.

The corruption scandals of the last several years have exposed the unbridgeable chasm between the Solidarity House apparatus and the union rank and file. In fact, direct elections are being held for the first time only because past UAW presidents and other high-level union executives were indicted and convicted of stealing workers' dues money and accepting bribes to sell us out.

The corruption has not been a case of "a few bad apples." A healthy organization does not fall prey to criminals. The corruption of the union is inseparably connected to the UAW bureaucracy's subordination of union members' interests to the corporate drive for profit. The taking of bribes from the auto companies is only the most extreme and criminal expression of Solidarity House's collaboration with the corporations and the betrayal of the workers it falsely claims to represent.

For more than four decades—starting in 1979 with the UAW’s acceptance of concessions as a condition of the bailout of Chrysler—the Solidarity House apparatus has turned the union into a pro-corporate police force. All its efforts are directed toward collaborating with the corporations to maximize their profits. Toward this end, the UAW uses the vast resources of the union to suppress every form of rank-and-file resistance to corporate exploitation.

Concessions contracts have become the norm. Every basic principle of working-class solidarity with which unions were originally associated have been abandoned. The union enforces a tier-system of wages that makes a mockery of unity. Strikes, the most essential weapon of struggle against corporate greed, have been suppressed for decades. And in the rare instance when they cannot be prevented, Solidarity House—determined to preserve the strike fund as its personal property—places strikers on starvation wages.

For the rank and file, the entire policy pursued by the UAW over 40 years has been a catastrophic failure. The wages, working conditions and benefits of workers have declined, year after year and contract after contract.

I am running based on a program to transfer power to the rank-and-file. The time has come to break up the apparatus whose payroll runs into the tens of millions of dollars annually. Hundreds of individuals on the Solidarity House payroll receive six figure salaries. They live comfortable lives, totally remote from the real-life experience of the hundreds of thousands of UAW members who struggle day after day to make ends meet.

It is necessary to end all the UAW-corporate bodies, such as the “joint training programs,” that have served as slush funds for the apparatus. The resources built up with the dues money of workers must be under the control of the workers themselves, to assist us in our struggles. The decisions of this organization affect the lives of millions of people, including our families. They should not be made in secret meetings with the companies, but democratically, on the shop floor, for all to see.

Official inflation has now reached 9 percent, and the reality is worse than that. Workers can’t afford these increases to gas, rent and food expenses under the sellout deals forced through by the apparatus. We need massive pay increases, Cost-of-Living Adjustments (COLA), an end to tiers and full funding of pensions for all retirees, no matter what. We don’t care what the company says it can afford, this is what our families need.

As a critical element of this struggle, we must unite with our class brothers and sisters throughout the world, and reject the nationalist perspective that the UAW has promoted, which has secured neither our jobs nor our working conditions. There are massive strikes and protests throughout the world over the same issues we confront.

It is imperative that in this election workers have a real choice, that there is as broad a field of candidates as possible. In an earlier period, there were real alternatives reflecting the views of the rank and file and different political tendencies. This democratic tradition was stamped out long ago, which freed the way for the bureaucracy to implement its disastrous course.

To appear on the ballot in the elections, however, I must be nominated at the UAW Convention, which begins on July 25. I am asking you to demand that the delegates from your plant nominate me so that I can present to UAW members in the upcoming election a real alternative—based on the defense of workers’ class interests—to the corrupt Solidarity House apparatus that functions as an industrial police force acting on behalf of the corporations.

For more information on my campaign, visit my website at WillForUAWPresident.org, to me at willforuawpresident@gmail.com, and text “Will” to 877-861-4428 for updates.

William Lehman

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Fri, Jul 15, 2022 at 3:27 PM

To: Will for UAW President <willforuawpresident@gmail.com>, "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>
Cc: "jody@merrimanriver.com" <jody@merrimanriver.com>

Mr. Lehman,

Thank you for your email and we apologize for any delay in response. We have been working with the UAW and the Election Vendor, Merriman River Group, to finalize the protocol and procedures for all mailing requests. To that end, we understand that you would like to have an email sent out to UAW members with email addresses on file.

Pursuant to Section 4-7 of the Election Rules, the Global Mailing List, which contains member email addresses, is maintained by the Election Vendor. As such, all requests to use the Global Mailing List must be sent directly to the Election Vendor by contacting Jody Clouse at jody@merrimanriver.com. In the interest of time, however, we have copied Ms. Clouse on this email so that your correspondence can be sent out as soon as possible. For all mailing requests going forward, please email the Election Vendor directly.

Please feel free to reach out with further questions.

Best,

UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>

Sent: Friday, July 15, 2022 10:21 AM

To: UAWMonitor_Election@stoneturn.com; UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Cc: willforuawpresident@gmail.com

Subject: Letter to UAW Global list

External Email - Do Not Click Links or Attachments Unless You Know They Are Safe

[Quoted text hidden]

Separately, the International Union has advised the Monitor that any UAW member in good standing who would like to attend the Convention but does not have credentials can come to the Convention Hall registration desk and request a guest pass. There are limitations on numbers for safety reasons, so in order to get a pass, we recommend members come early and bring proof of their membership. While members with guest passes will be able to come in to the Convention Hall and attend the proceedings, they will not have floor access. Further, if there is a Candidate who is nominated but not located on the floor, a microphone will be passed to them so they can accept their nomination. We understand that this is consistent with past practice.

Finally, you have indicated your plans to campaign at the Convention. Please see attached campaigning guidelines, which we provided to each declared Candidate for International Office earlier this morning.

Best,
UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>
Sent: Thursday, July 21, 2022 1:35 PM
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>; UAWMonitor_Election@stoneturn.com
Cc: willforuawpresident@gmail.com
Subject: Re: UAW Violations of September 9, 2021 Consent Decree

External Email - Do Not Click Links or Attachments Unless You Know They Are Safe

[Quoted text hidden]

 **Campaigning Guidelines 7.23.2022.pdf**
181K



William Lehman <willforuawpresident@gmail.com>

Re: UAW Violations of September 9, 2021 Consent Decree

Will for UAW President <willforuawpresident@gmail.com>

Thu, Jul 21, 2022 at 12:35 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Cc: willforuawpresident@gmail.com

Monitor Neil M. Barofsky

Jenner & Block LLP

1155 Avenue of the Americas

New York, New York 10036

Re: UAW Violations of September 9, 2021 Consent Decree

Dear Mr. Barofsky,

My name is William Lehman, I am a worker at the Mack Trucks plant in Macungie, Pennsylvania, and I am a candidate for UAW president. Your office deemed my campaign "bona fide" on July 13.

I am writing you to report serious violations by the UAW of the terms of the Consent Decree and the UAW 2022 Election Rules. These violations are part of an anti-democratic effort to keep me from the ballot and relate to the concerning information contained in your third status report to the U.S. District Court for the Eastern District of Michigan dated July 19, 2022.

The July 19, 2022 Status Report

In the July 19 status report, your office informed the District Court that, for much of 2022, the UAW leadership has stonewalled the monitor, denied it access to information to which it is legally entitled, and covered up for ongoing misuse of UAW funds, including by candidates for International office. The status report implicates incumbent UAW President Raymond Curry and Secretary-Treasurer Frank Stuglin personally in these actions. This raises considerable concerns about the fairness of the elections, because Mr. Curry is also contesting the race for presidency, and Mr. Stuglin is in charge of critical aspects of the election process.

The status report states, "the Union's cooperativeness [with the Monitor] veered sharply in the wrong direction" earlier this year. It adds that "the UAW has slowed its production of other investigative materials to the Monitor and declined to timely share certain information about its efforts to implement compliance reforms."

The status report explains that the UAW was systematically violating the Judge Lawson's Consent Decree:

Making matters worse, as the Monitor tried to carry on with his work, the Monitor uncovered evidence that the Union's leadership and its then-lawyers were concealing from the Monitor an investigation by the Union into the mishandling of a sum of cash by a regional Assistant Director, a senior Union official. The Union withheld information about this misconduct and the related investigation even though, from early in the monitorship, the Monitor has had a standing request to the Union for prompt disclosure of information about all investigations into potential financial misconduct or corruption taking place in the Union. The Monitor had also specifically warned the Union's President in writing about the need to comply with that demand, following a previous failure to do so. The Union compounded that violation of its obligation to cooperate with the Monitor by improperly excluding a representative of the Monitor from an "executive session" of a meeting of the Union's International Executive Board ("IEB") in which factual information about this ongoing investigation was shared.

The status report notes that "these actions resulted in the apparent obstruction and interference with the investigative work of the Monitor in violation of Paragraph 18(d) of the Consent Decree." The status report explains that US Attorney Dawn Ison convened a meeting with her staff and UAW President Ray Curry at which she said the UAW and President Curry were engaged in "gamesmanship" and would "face action from the Department of Justice" as a result.

The status report also discloses that there are currently 19 open investigations against the UAW, including "five new matters that were opened since the filing of the Initial Status Report" in November 2021. The most recent report notes "it is still too soon to fully assess the Union's progress in carrying out the reforms it must enact to sustain much needed cultural change" and that the UAW has a "great distance" to cover.

The status report also reveals that the UAW continues to misuse the hard-earned dues money of rank-and-file workers like me. The status report cites the fact that "the UAW used Union resources to purchase approximately 1,500 backpacks with the name and title of an IEB member who is currently running for IEB office" on them, even though this violates federal law. It cost the UAW \$95,000 to pay for these backpacks, which had the name "Secretary-Treasurer Frank Stuglin" on them. The involvement of Secretary-Treasurer Stuglin is concerning to me, since he was the official who has prevented me from obtaining the full delegates list, as I will explain below.

The status report further reveals that the UAW has renewed at least one contract with a consultant that would have been proscribed had the UAW followed the requirements of the Consent Decree regarding corruption. It shows the Union paid "more than \$850,000" to a consultant that was not required to submit reports showing whether they were actually doing any work. The report notes that the UAW is holding more and more conferences that "cost over a million dollars each" but have no oversight. At an April 2022 conference, the UAW spent \$300,000 on a dinner party in New Orleans.

Efforts by UAW to undermine my candidacy

The fact that the Department of Justice determined that leading UAW officials were engaged in violating the Consent Decree sheds critical light on actions that the UAW has taken against my campaign. The UAW has repeatedly violated the 2022 UAW Election Rules put forward by the Monitor in an attempt to keep me off the ballot and deny workers a real, rank-and-file alternative in the election.

On Thursday, July 14, I called and emailed Mr. Stuglin to obtain from the UAW the full list of delegates, as is my right under Rule 4-11, so that I could contact them and ask for their nomination at the upcoming convention. The rule states that "all candidates have the right to request and receive **from the Office of the UAW Secretary-Treasurer** a list of the names and Local Union numbers of **all** Convention delegates." (emphasis added)

Mr. Stuglin did not reply to my calls or emails. On Friday, July 15, at 4:30 PM, UAW Director of Information Systems Michael Lacour contacted me and said he had received a request for "some information" and would "provide direction on how to receive that information," but that he was "heading out of the office for the weekend" and would not be back until Monday morning. He did not answer the phone when a volunteer for my campaign called him back at roughly 4:40 PM that same day.

On Saturday, July 16, I emailed Mr. Stuglin and Mr. Lacour to repeat my request that they release the full delegate list to me immediately. On the morning of Monday, July 18, I called Mr. Lacour back as he instructed me to do, and he told me he needed to ensure my candidacy had been deemed "bona fide." I sent him the email from your office confirming I was bona fide, but he still did not provide me with any delegates list. I only received a delegates list on the afternoon of July 18 after contacting the Vendor, Merriman River, whose representative informed me that this was only a "partial list." This list contained only 841 names, which I understand is roughly half the total delegates elected to attend the convention. To date, Mr. Stuglin has not provided me with the full list and has not responded to any of my communications.

Between my initial request on July 14 and my receipt of a partial list on July 18, 5 days had passed, almost half of the time between my initial request and the start of the convention on the 25th. I still do not have the full list. Though I was able to send an email to this partial list through Merriman River on July 18, Rule 4-11 states that I have the right to a list of "**all** Convention delegates" to be provided by the UAW Secretary-Treasurer. Both the delay and the refusal of the UAW to provide the full delegate list has substantially deprived me of the ability to contact delegates as is my right under Rule 4-11.

Furthermore, over the week of July 14-15, volunteers for my campaign called UAW locals to ask for delegate lists and identified themselves as representatives of my campaign. They were told on multiple occasions by local officials that the locals would not provide delegate lists to my campaign. Workers who support my campaign report that in multiple workplaces, lists of convention delegates that had previously been posted in a public location have been removed so that workers cannot learn who their delegates are.

Additionally, on Tuesday, July 12, I wrote a request to the Monitor asking to send an email to the Global Mailing List pursuant to Rule 4-7 of the Election Rules to inform the membership about my campaign and reasons for running. Rule 4-7 states that I am entitled to "the entire list" and that "there shall be no discrimination in favor or against any Candidate" regarding emailing the global list. Rule 4-7 also states that "all bona fide candidates" will have the opportunity to use "the list of the last known names, mailing addresses, and email addresses of **all** members."

After receiving no reply, I sent follow-up emails to the Monitor on July 14 and 15. The Monitor did reply on July 16 and informed us the name of the Vendor. I was informed by Merriman River that the email list of UAW members consists of only 84,000 members, which Merriman River told me was sent by the Secretary-Treasurer's office. This constitutes only 10 percent of the total number of eligible voters in this November's election, in which 400,000 active members and 500,000 retirees are eligible to vote. The UAW's decision to make available only a tiny slice of the total membership's email addresses is a violation of my rights.

Furthermore, I plan to assert my right to attend the nominating session of the convention or have a representative of my campaign attend the nominating session in order to accept the nomination. Bona fide candidates like myself have rights under federal labor law, and the UAW is not respecting these rights.

Thank you for taking these matters under consideration,

William Lehman



William Lehman <willforuawpresident@gmail.com>

Notice regarding the UAW Convention

1 message

Will for UAW President <willforuawpresident@gmail.com>

Fri, Jul 22, 2022 at 10:54 AM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, sectreas@uaw.net

Cc: willforuawpresident@gmail.com

Dear Monitor and UAW:

I am writing to inform you that I will be present at the UAW Convention scheduled for July 25-28 in order to distribute campaign literature and attend the nomination session. I am entitled to do each pursuant to my rights as a bona fide candidate under the Consent Decree, the Labor-Management Reporting and Disclosure Act (LMRDA) and the First Amendment. It goes without saying that I will not disrupt any of the activities of the convention, and that my aim is to hold democratic discussions with fellow UAW members, to explain why I am running and to ask for their support.

The LMRDA says “a reasonable opportunity shall be given for the nomination of candidates,” and the U.S. Supreme Court has ruled that this means that bona fide candidates in union elections may **not** be excluded from distributing literature or from attending nominating meetings. Given the concerning information about ongoing UAW violations of the Consent Decree laid out in the Monitor’s July 19, 2022 Status Report (including by my opponent for UAW president, Ray Curry, who is not only attending the convention but overseeing its entire operations), it is very reasonable for me to distribute literature and attend the nomination session in person. Not only is it reasonable, it is necessary.

Please contact me if you have any questions,

Will Lehman



William Lehman <willforuawpresident@gmail.com>

Re: UAW Violations of September 9, 2021 Consent Decree

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Sat, Jul 23, 2022 at 4:58 PM

To: Will for UAW President <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>

Dear Mr. Lehman,

As to the availability of email addresses for members, both on the Global Mailing List generally and for Constitutional Convention delegates in particular: The International Union relies on Local Unions to provide members' email addresses on the LUIS database. This is an imperfect process, in part because not all Local Unions collect email addresses for their members, nor upload them to the system. Accordingly, the International Union does not have email addresses on file for all Local Union members, including delegates. The Monitor has and continues to work diligently with the Union to improve the list of both mailing and email addresses, as discussed in the Monitor's public reports.

Regarding the delegate list you were provided: We understand that the Election Vendor first sent your requested email to delegates and alternate delegates on Monday, July 18, to the most up-to-date list available to the International Union based on the information provided by Local Unions, which were still providing lists of their delegates and alternate delegates at that time. We further understand that another email blast was sent on Wednesday, July 20 to additional delegates and alternate delegates whose information had been added to the International Union's list at that time; and that per your request, an updated letter was then emailed to all delegates and alternate delegates on the International Union's list whose emails were on file yesterday, Friday, July 22. Also per your specific request, the Election Vendor provided you with a list of delegate names and Local Unions for all delegates and alternate delegates to whom your email was sent. This list therefore includes the delegates and alternate delegates for whom email addresses are available. In light of your email, we have asked the Election Vendor to send you a further updated list of all of the registered delegates and alternate delegates, which will include those for whom the International Union does not currently have email addresses on file. Please let us know if you do not receive this list.

Separately, the International Union has advised the Monitor that any UAW member in good standing who would like to attend the Convention but does not have credentials can come to the Convention Hall registration desk and request a guest pass. There are limitations on numbers for safety reasons, so in order to get a pass, we recommend members come early and bring proof of their membership. While members with guest passes will be able to come in to the Convention Hall and attend the proceedings, they will not have floor access. Further, if there is a Candidate who is nominated but not located on the floor, a microphone will be passed to them so they can accept their nomination. We understand that this is consistent with past practice.

Finally, you have indicated your plans to campaign at the Convention. Please see attached campaigning guidelines, which we provided to each declared Candidate for International Office earlier this morning.

Best,
UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>

Sent: Thursday, July 21, 2022 1:35 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>; UAWMonitor_Election@stoneturn.com

Cc: willforuawpresident@gmail.com

Subject: Re: UAW Violations of September 9, 2021 Consent Decree

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[Quoted text hidden]

 **Campaigning Guidelines 7.23.2022.pdf**
181K



William Lehman <willforuawpresident@gmail.com>

Notice on UAW nomination process

2 messages

Will for UAW President <willforuawpresident@gmail.com>

Tue, Jul 26, 2022 at 3:30 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Cc: willforuawpresident@gmail.com, sectreas@uaw.net

Dear Monitor,

I have been approached by UAW delegates who have communicated to me that they possess inside knowledge that the UAW leadership intends to use parliamentary maneuvers to block delegates from freely making nominations at the nomination session of the convention. I have also been told that the UAW leadership is putting pressure on delegates not to nominate me. The UAW's conduct as outlined in the July 19 Status Report gives reason to believe that what these delegates say is true.

Rule 3-3 of the UAW Election Rules states: "**Any delegate** seeking to nominate an individual to run for International President will **step up to the microphone** and propose that individual." The presiding official may not close the nomination until "all of the nominations for the Office of International President are complete." Any attempt via parliamentary maneuver to end-run these clear rules will constitute a serious violation of my rights as a rank-and-file member of the UAW to run for union president.

Furthermore, pursuant to Rule 2-12 of the UAW Election Rules, I plan to assert my right to have two representatives from my campaign observe the nomination tomorrow from the floor. Rule 2-12 states, "**Each candidate** for International Office in the 2022 UAW International Officer Election may observe or may designate others to observe **the process for nomination** and election." I will designate observers who will attend the nomination session in order to film the proceedings and ensure there is a record of what transpires.

At the nomination hearings tomorrow, I also considering a bona fide candidate to address all delegates and explain why I am running. Under Rule 3-3, nominators are allowed to make a 5-minute speech from the floor. Given the efforts by the UAW to block me from receiving a nomination, I have the right to speak.

Thank you,

Will Lehman

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Tue, Jul 26, 2022 at 4:47 PM

To: Will for UAW President <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>

Cc: "sectreas@uaw.net" <sectreas@uaw.net>

Mr. Lehman,

Thank you for reaching out to the Monitor team and alerting us to your concerns. The Monitor will have representatives present at the Convention during nominations tomorrow (as with every day the Convention is in session) to ensure the process goes smoothly and that all rules are followed. This includes Rule 3-3, which prohibits acceptance speeches.

Best,

UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>

Sent: Tuesday, July 26, 2022 4:30 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>; UAWMonitor_Election@stoneturn.com

Cc: willforuawpresident@gmail.com; sectreas@uaw.net

Subject: Notice on UAW nomination process

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William Lehman <willforuawpresident@gmail.com>

Email Lists

1 message

Will for UAW President <willforuawpresident@gmail.com>

Tue, Aug 9, 2022 at 7:34 AM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Dear Mr. Barofsky,

On July 21, I wrote your office requesting that the UAW remedy the fact that it has only made available a miniscule portion of its email list. In my letter, I wrote: "Rule 4-7 states that I am entitled to "the **entire** list" and that "there shall be no discrimination in favor or against any Candidate" regarding emailing the global list. Rule 4-7 also states that "all bona fide candidates" will have the opportunity to communicate with the membership by using the "email addresses of **all** members."

Your office wrote to me on July 23 and acknowledged that the process is "imperfect" and that many Locals have not "upload[ed] them [the emails] to the system."

Rule 4-7 states that I have the right to the email addresses of "all members," full stop. If, as you say, the UAW has not updated the list, this is clear proof they are willfully violating Rule 4-7. The UAW apparatus has the organizational infrastructure capability to communicate with its entire membership, and if it is failing to upload its members' emails to the database, that is because it is attempting to block opposition candidates like me from communicating with the membership.

This constitutes a substantial deprivation of my rights under the rules, as the email list that has been made available so far consists of under 90,000 people. By withholding the remaining emails, it is gagging me and preventing me from communicating with 90 percent of the eligible voters.

Moreover, pursuant to Rule 4-8 of the 2022 UAW Election Rules, my campaign "will be permitted" to send text messages to UAW members and to hold phone banks with the UAW's list of telephone numbers. Please inform me of the process for sending text messages and for calling members via telephone.

I am also writing to request the date and details of the September candidate forum.

Thank you for your time,

Will Lehman



William Lehman <willforuawpresident@gmail.com>

Important Information Regarding Candidate Forums

3 messages

UAW Monitor-Election <UAWMonitor-Election@jenner.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Fri, Aug 12, 2022 at 5:15 PM

Dear Candidate,

We write with an update regarding upcoming Candidate forums. As you know, Section 4-13 of the Election Rules provides that the Monitor shall have the authority to conduct voluntary International Officer Candidate forums. These forums shall be conducted to promote the fair, honest, open, and informed participation of the Union membership in the election of the International Officers. Candidates are encouraged but not required to participate.

In September 2022, the Monitor intends to host Candidate forums over Zoom for all nominated Candidates for the positions of (1) International President; (2) International Secretary-Treasurer; and (3) International Vice President.

While the Monitor team works to finalize plans for these Candidate forums, we ask that all nominated Candidates for International President, International Secretary-Treasurer, and International Vice President hold the following four dates: **Wednesday, September 14; Thursday, September 15; Monday, September 19; and Thursday, September 22.** The Monitor team anticipates that the Candidate forums will occur between approximately 6 pm ET and 8 pm ET. **As soon as possible**, please let the Monitor team know if you have a conflict that cannot be moved on one of these four dates.

To be clear, Candidates will not be asked to participate in more than one Candidate forum – at most, you will participate in one Candidate forum on the date selected for your race. The Monitor team has not yet determined the order or precise timing of forums; rather, we are asking you to hold all of these dates for planning purposes and will be in touch as soon as possible to let you know the final schedule and date that the Candidate forum for your race will be held.

The Monitor team will follow-up with additional information, including rules for the Candidate forums, as soon as possible. If you have any questions about the above, please reach out to the Monitor's Elections Team at UAWMonitor-Election@jenner.com or 212-303-2529.

Best,

UAW Monitor Elections Team

Will for UAW President <willforuawpresident@gmail.com>

Mon, Aug 15, 2022 at 2:49 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Dear Monitor,

First, thank you for notifying me of the times for the candidate forum. Unfortunately, my shift is in the evenings on weekdays and so the proposed dates and times do not work for me. Unless I am given time off to participate in the forum, I can only participate in an evening forum if it is held on a weekend.

Second, your office has not responded to my request for the ability to send text messages and phonebank pursuant to the rules. I raised these matters in my email of August 9, and nearly week has now gone by. The lack of response is depriving me of critical campaign time. My campaign is prepared to send texts and make phone calls, we are merely waiting for instruction from your office as to how to proceed.

Third, neither your office nor the UAW has responded to my request for the full email list. As it is your office's responsibility to ensure the UAW is complying with the rules, I am requesting that you reply with a description of the steps your office has taken to require the UAW provide access to the email list of "all members" as required by the rules, as well as how the UAW has responded to your efforts to produce the full list. So far I have been blocked from communicating via email with 90 percent of eligible voters.

I respectfully reiterate that the election is fast approaching and request that your office respond in a prompt manner.

Thank you,

Will Lehman

[Quoted text hidden]

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Mon, Aug 15, 2022 at 4:01 PM

To: Will for UAW President <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Mr. Lehman,

Per our earlier email sent on July 23, 2022, the International Union relies on Local Unions to provide members' email addresses on the LUIS database and not all Local Unions collect email addresses for their members, nor do all Local Unions upload them to LUIS. Accordingly, the International Union does not have email addresses on file for many Local Union members. You have the same email list available to the International Union and to all other Candidates. The Monitor has and will continue to work diligently with the Union to improve the lists of mailing and email addresses, as discussed in the Monitor's public reports.

Moreover, the absence of some member email addresses from LUIS is itself not a violation of the Election Rules or federal labor law. Additionally—absent additional evidence—the current state of the list of email addresses on LUIS does not constitute retaliation against you. We have seen nothing to suggest that the number of email addresses available on LUIS is in any way connected to an attempt “to block opposition candidates like [you] from communicating with the membership.”

As to text and phone banking, Rule 4-8 states that campaigning by telephone calls and text message “will be permitted **to the extent both feasible and lawful** under various federal laws around telemarketing, including the Telephone Consumer Protection Act of 1991.” (emphasis added). The Monitor is still looking into these issues and additional guidance on phone and text banking processes will be made available as soon as possible.

Finally, per the email circulated on Friday, August 12, the Monitor is in the process of planning the dates and rules around the upcoming Candidate forums and will share more information shortly. We do not anticipate that we will be able to host a Candidate forum over the weekend; as such, we request you make arrangements to attend on a weeknight, if possible (as with the Convention).

Best,

UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>
Sent: Monday, August 15, 2022 3:50 PM
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>
Subject: Re: Important Information Regarding Candidate Forums

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William Lehman <willforuawpresident@gmail.com>

Request for investigation regarding UAW intimidation

6 messages

William Lehman <willforuawpresident@gmail.com>

Thu, Sep 1, 2022 at 9:06 AM

To: "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Dear Mr. Barofsky,

I am requesting that your office investigate an act of intimidation by the UAW which violates my "Freedom to Advocate" pursuant to Rule 4-4 of the election rules and constitutes discrimination by the UAW against my campaign under Rule 4-5.

On August 23, I visited Flint GM Assembly plant with volunteers from my campaign. We went at shift change, in the afternoon, in order to speak to workers about my campaign and distribute leaflets with information about my program. We spent roughly an hour speaking to workers and handing out literature.

After an hour, a UAW official who identified himself as Local 598 District Committeeman Sean Meachem began to intimidate us and the workers with whom we were speaking. Meachem told us he was calling General Motors to inform them of our presence and remove us from the premises to prevent us from distributing literature and speaking to workers. When we explained our Freedom to Advocate under Rule 4-4, Mr. Meachem continued to order us to leave. He then instructed a woman wearing a UAW shirt to begin taking photographs of me, my volunteers, as well as workers who we were speaking to us. This was an attempt to intimidate workers from taking leaflets or holding discussions with me. (See attached photo of a UAW official photographing us and the workers we were talking to).

Rule 4-4 states "All Union members shall have the right to participate in campaign activities, including the right to openly support or oppose any candidate...Union members will be permitted to post or distribute leaflets, literature, or flyers; to solicit support, to conduct rallies; to hold fundraising events; or to engage in similar activities..." This section of the rule explicitly states that "campaigning at the workplace" is allowed, as long as they comply with employer rules.

Rule 4-5 states, "Retaliation or threat of retaliation by the UAW and/or its Local Unions; any officer, employee, or member of the UAW and/or its Local Unions...against a Union member...for exercising any right guaranteed by this or any other sections of the rules is prohibited. This specifically includes each member's freedom to advocate for or against any Candidate or Slate, to run for or seek to run for International Office...and to vote for or against any Candidate or Slate. **Any rules or practices...that are contrary to this provision will be considered a violation of these Rules. Any and all appropriate disciplinary remedies may be imposed individually or collectively to groups...on a case-by-case basis, for such violations.**"

District Committeeman Meachem told us he was calling General Motors. In [this video](#), he can be heard speaking to General Motors and saying, "We've got a group of people out here passing out flyers in the North Lot, can you have security come out here?" Meachem can then be heard saying "It looks like Will Lehman." He then says to us, "Security is coming to get you guys."

Security did not arrive for another 15 minutes or so, and when they came, two female security officers informed us the UAW, not GM, had told them to remove us. The security officials told us that we could stay because we were not violating rules. By this time, the shift change was over, and we left anyway. The exchange with security officers shows that our leafleting did not violate company rules in the eyes of GM's security representatives.

I am requesting that your office investigate this matter and order the UAW to cease and desist all attempts to block me from exercising my Freedom to Advocate at this plant and across the country.

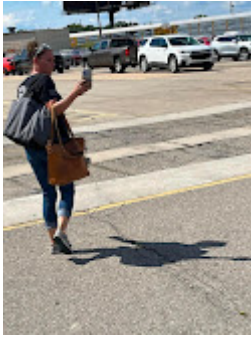
Of particular concern to me is that District Committeeman Meachem ordered another individual to take photographs of myself and the workers with whom I was speaking. This is an overt act of intimidation against workers who became fearful that they would be retaliated against at work for even speaking to me or taking a leaflet. This act is representative of the type of behavior rank-and-file workers have been forced to accept for years, in which the UAW has bullied and intimidated us while accepting bribes from the corporations behind our backs.

If this is to come close to resembling a free and fair election, it must be free of acts of intimidation like this.

Best,

Will Lehman

P.S. I am still awaiting guidance on access to phone numbers, the right to make robocalls and send mass texts. I have asked for this information multiple times in recent weeks. Meanwhile, a significant amount of time has passed and I am being deprived of the right to campaign through that method.



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438K

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Fri, Sep 2, 2022 at 1:24 PM

To: William Lehman <willforuawpresident@gmail.com>, "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Dear Mr. Lehman,

Thank you for your message. As you know, we take all allegations of Election Rule violations very seriously, and we are closely examining these claims, as well as the photo and video you provided. Please let us know your availability to speak with the Monitor team over the next few days to discuss further details.

With regard to your prior requests for guidance on access to phone numbers, the right to make robocalls, and send mass texts – as previously communicated, the Monitor team has been working to develop supplemental rules around texting and phone banking. We intend to publish these rules shortly.

Best,

UAW Monitor Elections Team

From: William Lehman <willforuawpresident@gmail.com>

Sent: Thursday, September 1, 2022 10:06 AM

To: UAWMonitor_Election@stoneturn.com; UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Subject: Request for investigation regarding UAW intimidation

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[Quoted text hidden]

William Lehman <willforuawpresident@gmail.com>

Sun, Sep 4, 2022 at 3:44 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Cc: "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>

Mr. Barofsky:

Thank you for your reply. Yes, I'm available to meet this week any day before 1 pm (I have work at 2). Can

you tell me who I will be meeting with? Also, I'd like to ask my lawyer to attend as well.

Thanks,

Will Lehman

[Quoted text hidden]

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Tue, Sep 6, 2022 at 5:53 PM

To: William Lehman <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Cc: "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>

Mr. Lehman,

Thank you for your response. Are you available to meet over Zoom on Friday between 10 am-12 pm ET? Representatives from the Monitor's Elections Team will join the call. You are welcome to have your lawyer attend as well.

[Quoted text hidden]

William Lehman <willforuawpresident@gmail.com>

Tue, Sep 6, 2022 at 10:41 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

OK, thank you, I can attend at that time.

Also, can you tell me which other candidates have confirmed they will participate in the debate on September 22, as well as which have said they will not? I will be participating. When will the discussions begin about the format of the debate and its rules? I would like to be involved in discussions on the debate rules. On the technical side, I know it will be on Zoom but how will it be broadcast? What efforts will be made to ensure that workers are aware of it and watch?

Thanks,

Will

[Quoted text hidden]

UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Thu, Sep 8, 2022 at 1:00 PM

To: William Lehman <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Mr. Lehman,

We are looking forward to meeting with you tomorrow at **10:30 am ET**. Please use the below Zoom information to log in:

Join Zoom Meeting

<https://jenner.zoom.us/j/3128407408?pwd=dHpjTWw0TUkrTE5LN2gwRmFTUXZvZz09>

Meeting ID: 312 840 7408

Password: 232753

We also appreciate your questions regarding the upcoming Candidate forums. We are in the process of finalizing rules for the forums; these rules will be issued very soon. We do not yet have information regarding which other Candidates will join at this time.

[Quoted text hidden]



William Lehman <willforuawpresident@gmail.com>

Urgent matters re UAW election

2 messages

Will for UAW President <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Thu, Sep 15, 2022 at 10:37 PM

Dear Mr. Barofsky,

This is Will Lehman, writing to insist on a prompt response to a number of urgent questions regarding my rights under the monitor's own election rules.

The rules that the monitor wrote specifically say I will have the right to send mass texts and to make robocalls. (Rule 4-8). Yet months have gone by and now the election is weeks away, and the monitor's office has still not told me how I can do this. I have asked repeatedly, dating back months, and am always told "later." I am beginning to understand that there won't be a "later," and that this is an attempt to keep me from communicating to the membership.

This is very unfair to me. I am a rank-and-file shop floor worker, I do not have the "phone tree" networks that Ray Curry has through the UAW institution. My only way to communicate with my fellow UAW members is to exercise my rights under the UAW rules set forth by your office because the bulk of the recent leadership of the UAW was convicted of corruption. I demand that access be given to the phone and robocall lists, and that if there is a price associated with sending information, it be accessible to rank-and-file campaigns like mine, and not only to Ray Curry.

Furthermore, I have continued to ask for full access to the email list but this office has not shown that it has made any effort to obtain a larger list from the UAW. The email list remains only about 10 percent of the number of voting members. The UAW is not providing a full list, as the monitor's office acknowledged in an earlier email. To make this election fair, this office must take action to acquire the full email list, and soon. Rule 4-7 says I have the right to email "all members." The claim that it is too difficult for the UAW to gather emails from the locals is absurd. All it would take is one email to every local, and the list could be put together in a matter of hours. There are hundreds of people employed at Solidarity House who are paid exorbitant salaries from the dues money of workers like me. I am sure they can find people to put together a full email list!

Lastly, in advance of the debate this Thursday, I have two questions. I assume you will guarantee equal speaking time to all candidates as a matter of course. Will a timer of the total minutes each candidate has spoken be provided for viewers on the screen? This is an appropriate measure which will guarantee fairness.

Please respond before the weekend, as time is ticking.

Thank you,
Will Lehman

UAW Monitor-Election <UAWMonitor-Election@jenner.com> Fri, Sep 16, 2022 at 9:56 PM
To: Will for UAW President <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Dear Mr. Lehman,

Thank you for your message. We have addressed your three separate concerns below.

First, under Election Rule 4-8, all Candidates are permitted to campaign via telephone calls and text messages provided such activity complies with all applicable state and federal laws, including, for example, the Telephone Consumer Protection Act of 1991. The Monitor team understands that you have sought to collect phone numbers as part of your campaign efforts -- you have sent emails stating: "To sign up for text updates, text WILL to (877) 861-4428." Calling or texting numbers you have gathered in this manner does not violate and is permitted under the Election Rules; however, it is your responsibility to ensure that doing so complies with all applicable state and federal laws, and the Monitor makes no

representations about the lawfulness of such activity. Election Rule 4-8 does **not** guarantee Candidates the right to numbers in the Union's database, which seems to be your belief based upon the language in your inquiries. No Candidate, including any current member of the International Executive Board, is currently permitted under the Election Rules to use a Union resource (e.g., the LUIS database) for the purpose of collecting member information to make campaign phone calls or text messages in connection with the 2022 UAW International Officer Election. Though not referenced in your question, there are several regulatory issues implicated by the use of the Union's database for texting or phone calls, and as such the Monitor will only issue additional guidance when it reaches a conclusion as to whether such use is appropriate. It may be the case that the Monitor concludes that the use of the LUIS database for these purposes will not be permitted for this Election, so you should be prepared for that outcome as you continue to plan your campaign.

Second, as to the Global Mailing List, the Monitor has previously addressed these issues in its communications with you on July 23, 2022, and August 15, 2022. The LUIS database utilized by the Election Vendor and under the supervision of the Monitor is the same database available to all Candidates. Any deficiencies in that list are the same for you as they are for anyone else seeking to use the database for campaign mailing purposes, including current IEB officers. We reiterate that the International Union does not have email addresses on file for many Local Union members. The International Union relies on Local Unions to provide members' email addresses to populate the LUIS database, and not all Local Unions collect email addresses for their members, nor do all Local Unions upload them to LUIS. The Monitor has and will continue to work diligently with the Union to improve the lists of mailing and email addresses, as discussed in the Monitor's public reports.

Finally, with regard to the International President Candidate Forum on September 22, 2022, there will not be a timer reflecting each Candidates' cumulative speaking time. The Moderator will grant each Candidate time to speak in accordance with the Candidate Forum Rules. A timer reflecting how much time the Candidate has left to speak will be visible on screen for all participants and viewers. You can see how this looked and worked during last night's International Secretary-Treasurer Candidate Forum [here](#).

We strongly encourage you and your counsel to study the Election Rules which are located on our website as many of the issues you've raised now and previously are directly addressed by those rules. With that said, we are always here to try to answer questions you have.

Best,

UAW Monitor Elections Team

-----Original Message-----

From: Will for UAW President <willforuawpresident@gmail.com>

Sent: Thursday, September 15, 2022 11:37 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Subject: Urgent matters re UAW election

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[Quoted text hidden]



William Lehman <willforuawpresident@gmail.com>

Distributing debate recording to "broadest possible audience"

3 messages

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Mon, Sep 26, 2022 at 11:04 PM

Dear Mr. Barofsky,

Rule 4-13 of the UAW monitor rules state that "The Monitorshall distribute information about the forum and the recording of the forum to the Union membership. The manner of distribution shall be determined by the Monitor, after consultation with the Union and the nominated Candidates or their Credentialed Representatives. In making this determination, the Monitor shall consider how best to use available resources and technology to reach the broadest possible audience of the Union electorate at a reasonable cost."

So far, nothing seems to have been done to promote the video of the event. A video of the forum is not even on the UAW's website. The UAW's official Twitter account promoted a link for the debate for Secretary Treasurer, but did not make any posts about the debate for President.

A Google search for "UAW presidential forum" and similar terms does not yield a result in the first seven pages. The video has only 11,000 views, which is about 1 percent of the voting population. Given that the email list only includes about 10 percent of the voting membership, an email to the membership will clearly be insufficient. I have met many workers who have told me they did not even know a debate or forum was happening.

Could you please outline what steps are being taken to ensure the recording of the debate reaches "the broadest possible audience" beyond the 1 percent who have seen it already? My campaign was never consulted about the manner of distribution pursuant to the rules.

Thank you,
Will Lehman

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Fri, Sep 30, 2022 at 12:59 PM

Hello, several days have gone by and I have not received a response. Could you respond by the end of the day so we don't lose the weekend? Every day of delay impacts my campaign.

[Quoted text hidden]

UAW Monitor-Election <UAWMonitor-Election@jenner.com>
To: William Lehman <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Fri, Sep 30, 2022 at 3:15 PM

Mr. Lehman,

The Candidate Forum Rules, which the Monitor has shared with you a number of times, detail the steps taken or to be taken to publicize the Candidate Forums. See, e.g., Candidate Forum Rule 2. The Candidate Forum Rules were drafted in a manner consistent with Election Rule 4-13, and include consideration of how best to use available resources and technology. In addition to the Monitor's efforts to publicize the Candidate Forums, you are of course also welcome to promote the Candidate Forums yourself.



William Lehman <willforuawpresident@gmail.com>

Question on voting rolls

2 messages

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Wed, Oct 12, 2022 at 9:04 AM

Hello,

I would like to be able to review the voting rolls. The rules say "Candidates and/or their observers shall be permitted to inspect the ballot mailing list." This rule is elaborated in section 7-1, which makes clear I can inspect the list now, since we are within 30 days of the beginning of voting (ballots are being mailed on October 17 and workers can vote immediately upon receiving ballots). What is the process for inspecting the list?

Also, regarding observers for the counting of ballots, how many observers will be allowed, and will workers be given time off to observe? Since travel will be required to the location where ballots will be counted, it will be critical for my observers to be given time off.

Thank you,
Will Lehman

UAW Monitor-Election <UAWMonitor-Election@jenner.com>
To: William Lehman <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Fri, Oct 14, 2022 at 10:58 AM

Mr. Lehman,

As to your request to inspect the Global Mailing List, Election Rule 7-1 provides that any request to inspect the Global Mailing List must be made via email to the Election Vendor, and it will be honored as soon as practicable. If you wish to inspect this list, please send your request to the Election Vendor. The Election Vendor will provide further details as to the inspection protocol. Please note that all inspections will be arranged to occur in-person under supervision of the Election Vendor and/or Monitor team.

As to your questions regarding observers, the Monitor circulated guidance to all Candidates regarding observers on August 29 and September 2, and also published Rules for Observers to all Candidates on September 2. As set forth in the Election Rules and Rules for Observers, each Candidate or Slate of Candidates has the right, at their expense, to have at least one (1) individual present to observe the printing, mailing, and counting of ballots. A Slate of Candidates is entitled to have at least one (1) individual present to observe the aforementioned activities, in addition to any observers representing the Slate's constituent Candidates. Only a member in good standing may serve as an observer. If a Candidate or Slate of Candidates requests more than (1) individual to observe any of these activities, reasonable requests will be accommodated, but the Monitor reserves the right to restrict the total number of observers permitted for each Candidate or Slate of Candidates as needed to comply with safety and security issues, or to otherwise comply with the Election Rules.

The Monitor does not have jurisdiction over employers or whether requests for individuals to take time off to serve as observers would be honored.

Best,

UAW Monitor Elections Team

From: William Lehman <willforuawpresident@gmail.com>
Sent: Wednesday, October 12, 2022 10:04 AM
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>
Subject: Question on voting rolls

External Email - Do Not Click Links or Attachments Unless You Know They Are Safe

[Quoted text hidden]

 **2022 UAW International Officer Election - Rules for Observers.pdf**
258K



William Lehman <willforuawpresident@gmail.com>

URGENT: Workers report UAW violating federal law by telling TPTs they cannot vote

3 messages

Will for UAW President <willforuawpresident@gmail.com>

Tue, Nov 1, 2022 at 2:06 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Dear Mr. Barofsky,

I am bringing to your attention a matter of utmost importance regarding reports of violations of federal law by the UAW in restricting the right of UAW members to vote in this election. On behalf of Temporary Part Time (TPT) members of the UAW, I ask that you conduct an immediate investigation into this matter and take swift action to remedy the violation of workers' right to vote.

Rule 5-1 of the election rules states: "Members who work only part time but pay the required dues may not be denied the right to vote." Section 401(e) of the Labor Management Reporting and Disclosure Act also states that all members in good standing "shall have the right to vote for or otherwise support the candidate or candidates of his choice, without being subject to penalty, discipline, or improper interference or reprisal of any kind by such organization or any member thereof."

My campaign has heard from multiple workers that elected UAW officials at Detroit Assembly Complex-Jefferson (formerly JNAP) in Detroit (UAW Local 7) and the Detroit Assembly Complex-Mack (UAW Local 51) are telling TPTs that they do not have the right to vote in the election for International UAW officers.

At Detroit Assembly Complex-Jefferson, a worker contacted my campaign and volunteered information that at least one UAW shop steward is "telling TPTs they can't vote." This worker reported that a TPT asked out loud whether they could vote in the elections, and the "answer was a no." (See attached text discussion dated Friday, October 28). There are roughly 4,500 workers at JNAP and a substantial portion are TPTs, indicating that thousands of workers could be disenfranchised.

At Detroit Assembly Complex-Mack, workers are reporting the same violation of the right to vote. According to these workers, multiple TPTs are saying that at least one UAW official is informing TPTs that because they do not get profit sharing, they are ineligible to vote in the election. One worker reported to my campaign that a UAW official is telling TPTs that if they receive ballots in the mail, that they should not fill them out or mail them. The Mack Avenue plant has roughly 5,200 workers and a high rate of TPTs, also indicating a high rate of disenfranchisement.

The workers who stepped forward with this information asked to remain anonymous because they are fearful that the UAW and/or their employer will target them for retribution. Pages 409 and 410 of the UAW-Stellantis contract from 2019 make clear that TPTs can be fired for any reason within a year of being hired. Because they have no rights and because the UAW regularly treats them like second class citizens who can be fired easily, it makes sense that these workers are reticent to step forward publicly.

There are other issues of concern at these plants which indicate an intention on the part of the UAW to suppress the vote among TPTs.

Local 7 (JNAP) has no reference on its [website](#) to the UAW election. Its calendar (see attached) does not even include the election, or any of the critical deadlines associated with the balloting process (checking ballot, mailing ballot, etc.). Rule 2-4 of the Election Rules states that Local Unions must give "Notice of Election." It reads: "Local Unions shall either post the informal notice or a link to the UAW's or Monitor's website regarding the Election. The informal notice shall (1) provide members with key information concerning the 2022 Election, including the nomination process, schedule, and other relevant information; and (2) direct members to the websites, where they may view these Rules and obtain up-to-date information regarding the 2022 Election."

Furthermore, it appears that Local 51 is promoting and endorsing a candidate for UAW president on its [Facebook page](#). Rule 4-6 of the Election Rules says: "Federal law prohibits the use of any union or employer resources to promote the candidacy of any person in a union election." This includes "computer equipment and networks" like Facebook pages. Section 401(g) of the Labor Management also prohibits such activity.

These violations compound concerns over what workers are reporting to my campaign regarding UAW officials telling TPTs they cannot vote in the election. Because we are less than a month away from the deadline for ballots to be sent, and because these reports indicate that the UAW may be systematically telling TPTs that they cannot vote, this matter requires swift action in order to ensure the fairness of the election. TPTs pay dues and are just as much a part of this union as full-time workers. It is high time they be treated like human beings with rights.

I therefore demand that you require the UAW publish a statement asserting that Temporary Part Time workers are eligible to vote in the international election, and that each UAW local be required to email its entire membership notifying them of the election deadlines and clarifying that TPTs have the right to vote. I ask that this be done by November 7, so that TPTs have time to ensure they receive ballots on time to cast their votes in this critical election.

Thank you,
Will Lehman



UAW Monitor-Election <UAWMonitor-Election@jenner.com> Mon, Nov 7, 2022 at 11:25 PM
To: Will for UAW President <willforuawpresident@gmail.com>, UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <UAWMonitor_Election@stoneturn.com>

Dear Mr. Lehman,

Thank you for reaching out to the Monitor with these concerns. We take all allegations regarding violations of the Official Rules for the 2022 UAW International Officer Election (the "Election Rules") seriously. Below please find our responses to the concerns raised in your email.

Temporary Part Time Workers

-

In your email, you correctly note that Temporary Part Time workers are eligible to vote in the 2022 UAW International Officer Election (the “2022 Election”) if they are members in good standing as of October 31, 2022, and otherwise meet the general membership requirements of Art. 6, Section 2 applicable to all UAW members. To be clear, to the extent that they are members in good standing with their Local Union and reflected as such on the Local Union Information System database (“LUIS”), all Temporary Part Time workers should have received their ballots in the normal course along with all other UAW members. If you know of a Temporary Part Time worker, or anyone else, who believes that they are a UAW member in good standing and should be eligible to vote but have not received a ballot, please instruct them to immediately request one online at www.uawmonitor.com/ballots or by calling 855-433-8683.

To address the concerns regarding Temporary Part Time Workers raised in your email, we have taken steps to combat any confusion.

- First, the Monitor’s Office has published a **Ballot and Count Questions and Answers** document, available on the Monitor’s website at www.uawmonitor.com/elections and the Election Vendor’s website at [Ballot Request Merriman River Independent Monitor of the UAW \(uawvote.com\)](http://Ballot Request Merriman River Independent Monitor of the UAW (uawvote.com)), that includes this information and instructs Temporary Part Time workers, or anyone else, who believes that they are a UAW member in good standing and should be eligible to vote but have not received a ballot to immediately request one online at www.uawmonitor.com/ballots or by calling 855-433-8683.
- Second, the Monitor’s Office, in consultation with the UAW, prepared a communication to all Local Unions instructing them to (1) remind their members about the ballot deadlines; (2) confirm the eligibility status of each of their members, including Temporary Part Time workers, is updated in LUIS by November 11, 2022; and (3) confirm that members are aware that Temporary Part Time workers are eligible to vote in the 2022 Election if they meet the definition of membership contained in Article 6, Section 2 of the UAW Constitution and are in good standing with the Union as of October 31, 2022 at 5 p.m. ET. On Saturday, November 5, 2022, this communication was circulated to all Local Unions and posted on LUIS.

Local 51 – Facebook Page

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We appreciate you bringing your concern regarding the Local 51 Facebook page to our attention. We have looked into this Facebook page and determined that it is not an official Local Union page. As such, any campaigning or advocacy posted to that page would not, on its face, constitute a violation of the Election Rules UAW Local 51 does have an official Facebook group managed by its top four officers, available [here](#). Our understanding is that Local 51 has, in fact, tried to take down the other Local 51-related Facebook page that you raise below. The Monitor team will continue to aid Local 51 in these efforts.

Local 7 – Notice of Election

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We have closely reviewed the Local 7 website. Our understanding is that Local 7 has posted a [notice](#) regarding the 2022 Election, even though it is not the same notice posted by the Monitor and UAW on their

respective websites, which is available [here](#). The Monitor's Office has reached out to Local 7 leadership to request that they also post the Monitor's and UAW's informal notice regarding the 2022 Election, consistent with Election Rule 2-4.

Please let us know if you have any further questions or concerns.

Best,

UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>

Sent: Tuesday, November 1, 2022 3:07 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>; UAWMonitor_Election@stoneturn.com

Subject: URGENT: Workers report UAW violating federal law by telling TPTs they cannot vote

External Email - Do Not Click Links or Attachments Unless You Know They Are Safe

[Quoted text hidden]

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Tue, Nov 8, 2022 at 11:04 AM

Hello Mr. Barofsky,

Thank you for acknowledging that there are issues with what the UAW is telling TPTs. You write that the UAW locals are each now required to "remind their members about ballot deadlines" and "confirm that members are aware TPTs are eligible to vote," but your email does not indicate how they will be required to do so and how workers can know it is being complied with. This is particularly concerning because the incidents I reported were actions by local officials, so leaving it up to the UAW locals to fix is clearly not going to resolve the issue. A post to a UAW local website isn't enough because hardly any workers check those.

Please respond with the specific actions each UAW local is required to take to (1) remind members of deadlines and (2) inform TPTs they can vote, as your clarification says they must do. If you can respond today I would appreciate it as time is running out to correct these issues and workers are worried about their votes not being counted.

Thanks,
Will

[Quoted text hidden]



William Lehman <willforuawpresident@gmail.com>

Concerns about election fairness

1 message

Will for UAW President <willforuawpresident@gmail.com>

Wed, Nov 9, 2022 at 2:15 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Dear Mr. Barofsky:

I write to bring to your attention serious concerns that UAW members are raising with my campaign over the fairness of the election for international office. **The official vote tally shows that only 83,377 members have voted so far—less than 8 percent of the total membership, and each day the tally increases by only a couple thousand votes.** It is clear that a substantial portion of the 1 million-plus UAW membership either doesn't know there is an election, doesn't know they are eligible to vote, or hasn't received a ballot.

This, combined with the fact that your office has now reported that Ray Curry's slate was found to have violated Election Rule 4-6 and has used union resources to help Curry shows that something must be done to change course and ensure a fair election.

Here is what workers report:

1. Many workers have not yet received ballots

My campaign has received reports from UAW members across the country who say they have not received ballots yet. When my volunteers campaign at plants, they are told by a substantial section of workers that ballots have not been received.

This raises very serious questions as to delays in the mailing of ballots, especially considering the fact that the UAW election coincided with a federal election conducted largely through the mail. Workers must be given a fair chance to have their vote count.

2. The Monitor's mechanism for requesting ballots is failing

Multiple UAW members have contacted my campaign to explain that they attempted to call the Monitor's help line multiple times or submit requests for ballots online, but that they have still not received ballots.

One UAW member in New York wrote me to say, "I have reached out to 4 people about this." The worker said "I never received a ballot" after calling the help line "multiple times." "I've also requested a ballot via the link that I was sent but I still have received nothing in the mail."

Another UAW member from Local 551 said they still had not received a ballot despite making their initial request for one over two weeks ago and calling the hotline three times. A member from Local 79 said, "If I could get a ballot I would vote, I've asked twice for a ballot and haven't got one." This is clearly a common experience and unless it is addressed it risks disenfranchising thousands and thousands of members.

3. Workers report UAW officials are telling them the deadline to mail ballots was October 28

Workers in at least two plants—GM Arlington in Texas and Mopar in Centerline, Michigan—are informing my campaign that UAW officials are telling eligible voters that the deadline to mail in their ballot was October 28, and that they need not send their ballots now because it is too late. This is not the correct deadline. If an investigation confirms what workers report, this would amount to a violation of federal law and of workers' right to vote.

4. No accountability for the UAW's false claim that TPTs cannot vote

TPTs in at least two Stellantis plants—Detroit Assembly Complex - Jefferson and Detroit Assembly Complex - Mack in Detroit—reported that UAW officials are spreading rumors that TPTs are ineligible to vote. This would be a lie aimed at suppressing the vote of the most poorly treated workers. My campaign notified your office of this on November 1, and you responded to say you had requested that UAW local inform their member that TPT can vote and that ballot must be sent by November 18.

But your office has not said what *specific* measures are being taken to ensure the UAW locals actually do inform their memberships of impending deadlines and of TPT voter eligibility in an effective way. Placing notices on websites nobody goes to does not count as providing fair notice. The absence of any real enforcement mechanisms would mean the UAW apparatus is not being held accountable for what would be a violation of federal law.

There is evidence that the UAW apparatus is not taking action to clarify any confusion.

The UAW International has not even published anything on its website nor has it even issued a single communication informing members of impending deadlines or of the right of TPTs to vote on its official Twitter and Facebook pages.

For example, Local 7 (the local for the Stellantis Jefferson plant) has published a statement on its website about the election which does not state that TPTs have the right to vote. Its "Events calendar" still makes no reference to any impending deadlines. A review of all local websites and social media pages shows the overwhelming majority do not reference either issue. It is clear as day that the UAW is trying to keep workers from learning about the election.

5. Ray Curry campaign found to have violated election rules

How can the UAW be in charge of correcting these issues when your office has just ruled that the Ray Curry campaign is violating federal law by using UAW resources to promote Curry's campaign? In an email dated November 9, your office informed my campaign about "an Election Rules violation by the Curry Solidarity Team Slate."

You wrote that after an investigation, the Monitor ruled that the Curry team violated federal law by sending a campaign email to hundreds of workers on a list that was "obtained from a Union resource." You wrote that "The Curry Solidarity Team Slate violated Election Rule 4-6, which makes clear that federal law prohibits the use of Union resources, including contact lists that were created or compiled as part of official duties or functions, to promote the candidacy of any person in a Union election."

6. UAW making no effort to inform workers of the imminent deadline for requesting a ballot

The UAW apparatus is making no real attempt to inform workers that they can request ballots if they have not received them yet. On the contrary, it seems they do not want workers to know the deadline for requesting a ballot is only two days away. The UAW website does not make any reference to requesting ballots for workers who have not received them yet, at least not one that is easy to access from their front page.

The UAW's official Twitter account has not issued a single tweet about this. In fact, the UAW's official Twitter account has only made a few tweets *all year* about the UAW elections, compared with 47 tweets promoting Administration Caucus candidate Ray Curry. Few UAW locals have information on their websites about requesting ballots, and those that do fail to mention that the deadline for requesting a new ballot is November 11.

7. UAW official intimidated voters at plant in Elizabethtown, Kentucky

Last week, workers at the Metalsa parts plant in Elizabethtown, Kentucky, were intimidated from speaking to my campaign volunteers by UAW Local 3047 official Gary Parr, who called company security and began taking photos of nearby license plates in an attempt to intimidate workers from learning about my campaign. A similar act of intimidation took place in August, when a UAW Local 598 official instructed someone to photograph workers who had been talking to me about my campaign at GM Assembly in Flint, Michigan.

8. July 19 Monitor Status Report said UAW apparatus was violating consent decree

What workers report is extremely concerning. The consent decree says there must be a fair, direct election, but your office already held that the UAW apparatus has violated the consent decree.

That status report your office issued on July 19, 2021 says that "the Monitor uncovered evidence that the Union's leadership and its then-lawyers were concealing from the Monitor an investigation by the Union into the mishandling" of union money. When incumbent candidate for UAW president Ray Curry refused to disclose critical information to your office, you wrote that the Department of Justice told Curry he would "face action from the Department of Justice." Your office also said there were 19 open investigations, including five new investigations in recent months.

Serious action must be taken. Only 8 percent of UAW members have voted and your office has ruled the Curry slate is violating the election rules. It is necessary to guarantee that every single eligible voter actually knows an election is taking place, that urgent measures be taken to ensure every single eligible voter receives a ballot at the correct address with enough time to mail it back, and that these matters be communicated to the entire UAW membership in a way that is guaranteed to actually inform them of their rights.

Sincerely,

Will Lehman



William Lehman <willforuawpresident@gmail.com>

Remediation of Election Rules Violation - Please Read (Will Lehman)

6 messages

McGorty, Glen <GMcGorty@crowell.com>

Wed, Nov 9, 2022 at 12:00 PM

To: Will for UAW President <willforuawpresident@gmail.com>

Cc: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Dear Mr. Lehman,

We are writing to advise you of a campaign opportunity resulting from an Election Rules violation by The Curry Solidarity Team Slate.

Specifically, the Monitor received a complaint that, on October 26, 2022, The Curry Solidarity Team Slate sent a campaign email to approximately 600 UAW members using Union resources. After conducting an investigation into the matter, the Monitor determined that the October 26 email was a campaign email, and the email was sent to a list of email addresses which were in part obtained from a Union resource – namely, a list of UAW members who had signed up to receive communications from UAW Region 2B. By sending an email to this list, The Curry Solidarity Team Slate violated Election Rule 4-6, which makes clear that federal law prohibits the use of Union resources, including contact lists that were created or compiled as part of official duties or functions, to promote the candidacy of any person in a Union election. See LMRDA, Title IV, Section 401(g). While the Monitor’s investigation found that this violation of the Election Rules was unintentional, the practical implication of the email having been sent remains.

We have advised The Curry Solidarity Team Slate of the Election Rules violation and informed them that, as remediation for this violation, any affected Candidates – meaning, any opponent of any Candidate belonging to The Curry Solidarity Team Slate – will have an opportunity to send an email of similar length to the list of approximately 600 individuals to whom the October 26 email was sent, and whose email addresses were derived from the Region 2B contact list.

As you are running in opposition to a member of The Curry Solidarity Team, please advise us as soon as possible whether or not you wish to avail yourself of this opportunity.

Best,

Glen McGorty

On Behalf of the Monitor

Glen G. McGorty

Pronouns: he/him/his

gmcgorty@crowell.com

+1.212.895.4246 direct

[LinkedIn](#)

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William Lehman <willforuawpresident@gmail.com>
To: "McGorty, Glen" <GMcGorty@crowell.com>

Wed, Nov 9, 2022 at 1:14 PM

Hello Mr. McGorty,

Thank you for your letter. I will certainly avail myself of the right to email those workers. Just tell me how.

Also I may have more questions for you about the issue with Curry, but I just wanted to tell you quickly that I would like to send an email.

Thank you,
Will Lehman
[Quoted text hidden]

William Lehman <willforuawpresident@gmail.com>
To: "McGorty, Glen" <GMcGorty@crowell.com>

Thu, Nov 10, 2022 at 11:45 AM

Mr. McGorty,

The violation of federal laws prohibiting the use of union resources for campaign purposes by incumbent president Ray Curry is very concerning to my campaign. Your investigation's determination, combined with the Monitor's July 19, 2022 status report warning that Curry was engaged in illegal behavior and that the Department of Justice was considering filing charges against him, raises the urgent need for full accountability and transparency about how Curry is conducting his campaign. I would like to send an email to the same list Curry illegally used, but this remedy is totally insufficient to correct a violation of federal law by the incumbent candidate given the circumstances under which this election is being held.

Please reply with the following information:

- 1) The text of the email Curry sent illegally.
- 2) Information as to how the Monitor was alerted to this violation and how the Monitor determined the violation was "unintentional."

- 3) An explanation as to why, if the Monitor determined Curry violated federal law, no legal action is being taken against him or his campaign?
- 4) What specific steps are being taken by the Monitor to investigate other emails/texts/robocalls the Curry campaign has made over the course of this election?
- 5) In its July 19 report, the Monitor indicated that there were 19 open investigations into the UAW leadership at the time. How many investigations are presently open? What are the issues involved in each of those investigations? Workers have a right to know whether and how any investigations may be related to the fairness of the election.
- 6) What specific steps are being taken by the Monitor to ensure the Curry team is in compliance with federal law going forward?

Thank you,
Will Lehman

[Quoted text hidden]

UAW Monitor-Election <UAWMonitor-Election@jenner.com>
To: Will for UAW President <willforuawpresident@gmail.com>
Cc: "McGorty, Glen" <GMcGorty@crowell.com>

Thu, Nov 10, 2022 at 3:00 PM

Dear Mr. Lehman,

Thank you for your response. If you would like to send an email to the list of approximately 600 individuals from the Region 2B list to whom the October 26 email was sent, then please follow the below steps:

1. Craft an email of no more than 275 words (the length of The Curry Solidarity Team Slate email);
2. Submit that email to the Election Vendor, MRG, as you would any traditional campaign email to be distributed by the Election Vendor;
3. When you submit the email to MRG, please clearly indicate that you are availing yourself of the opportunity to send an email to the **Region 2B list**;
4. Please **copy** Glen McGorty on your email to the Election Vendor.

You will not be charged any fee for this email.

Please let us know if you have any further questions.

Best,

UAW Monitor Elections Team

From: William Lehman <willforuawpresident@gmail.com>
Sent: Wednesday, November 9, 2022 2:15 PM
To: McGorty, Glen <GMcGorty@crowell.com>
Subject: Re: Remediation of Election Rules Violation - Please Read (Will Lehman)

External Email

[Quoted text hidden]

Matthew T. Gordon

Jenner & Block LLP
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William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>
Cc: "McGorty, Glen" <GMcGorty@crowell.com>

Tue, Nov 15, 2022 at 7:47 PM

Here is my email. 375 words exactly. Please send ASAP as the deadline is fast approaching.

*

Dear UAW member,

This is Will Lehman, rank-and-file candidate for UAW president. You are receiving this email because Ray Curry's slate broke federal law by emailing you last month. Federal law and the rules of this election prohibits use of union resources to campaign for office.

As a remedy to Ray Curry's illegal behavior, the Monitor didn't take any action against his campaign. Instead, the Monitor told me I can email you as well, even though I only get to do so several weeks later, which is not a real remedy, since most of you have already voted since then and I didn't get a chance to change your minds. I asked the Monitor who is on this list and what Curry's slate said to you so I could respond or have a better idea what issues I should talk to you about, but they didn't tell me anything other than that you signed up for something in Region 2B.

It's like being led before a stage blindfolded and told to speak without knowing who my audience is or what they would be interested in hearing about. Are you retirees who the UAW apparatus has forgotten about throughout years of corruption, reducing conditions to us current workers to levels not seen since long before you first clocked in in the 1940s-1980s? Are you second tier workers like me who don't make the same as our brothers and sisters on the line with us?

This is what I ask you: if you had already voted when you received this email, reply and say so. I ask because there is growing evidence that this is not a fair election. There are widespread reports of workers not receiving ballots on time to vote, even after requesting them from the monitor multiple times. So, please reply to this email if you already voted when you got this email, even if you didn't vote for me, and also let me know if you have information about ballot issues at your workplace.

Thank you,
Will Lehman

P.S. The Monitor said I get 375 words and I'll use every last one: my campaign will take power from the apparatus and give it to the rank-and-file. I ask that you vote for me.

[Quoted text hidden]

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>
Cc: "McGorty, Glen" <GMcGorty@crowell.com>

Tue, Nov 15, 2022 at 7:55 PM

I'm sorry, here is the 275 word version per your rule. I misread the word total. Thank you.

Dear UAW member,

This is Will Lehman, rank-and-file candidate for UAW president. You are receiving this email because Ray Curry's slate broke federal law by emailing you last month and abusing union resources.

As a remedy to Curry's illegal behavior, the Monitor didn't take action against his campaign. Instead, the Monitor told me I can email you too, even though I only get to do so several weeks later, which isn't a real remedy, since most of you have already voted since then and I didn't get a chance to change your minds. I asked the Monitor who is on this list and what Curry's slate said to you so I could respond or have a better idea what issues I should talk to you about, but they didn't tell me anything other than that you signed up for something in Region 2B.

This is what I ask you: if you had already voted when you received this email, reply and say so. I ask because there is growing evidence that this is not a fair election. There are widespread reports of workers not receiving ballots on time to vote, even after requesting them from the monitor multiple times. So, please reply to this email if you already voted when you got this email, even if you didn't vote for me, and also let me know if you have information about ballot issues at your workplace.

Thank you,
Will Lehman

P.S. The Monitor said I get 275 words and I'll use every last one: my campaign will take power from the apparatus and give it to the rank-and-file. I ask that you vote for me.

[Quoted text hidden]



William Lehman <willforuawpresident@gmail.com>

Concerns about election fairness

1 message

Will for UAW President <willforuawpresident@gmail.com>

Wed, Nov 9, 2022 at 2:15 PM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Dear Mr. Barofsky:

I write to bring to your attention serious concerns that UAW members are raising with my campaign over the fairness of the election for international office. **The official vote tally shows that only 83,377 members have voted so far—less than 8 percent of the total membership, and each day the tally increases by only a couple thousand votes.** It is clear that a substantial portion of the 1 million-plus UAW membership either doesn't know there is an election, doesn't know they are eligible to vote, or hasn't received a ballot.

This, combined with the fact that your office has now reported that Ray Curry's slate was found to have violated Election Rule 4-6 and has used union resources to help Curry shows that something must be done to change course and ensure a fair election.

Here is what workers report:

1. Many workers have not yet received ballots

My campaign has received reports from UAW members across the country who say they have not received ballots yet. When my volunteers campaign at plants, they are told by a substantial section of workers that ballots have not been received.

This raises very serious questions as to delays in the mailing of ballots, especially considering the fact that the UAW election coincided with a federal election conducted largely through the mail. Workers must be given a fair chance to have their vote count.

2. The Monitor's mechanism for requesting ballots is failing

Multiple UAW members have contacted my campaign to explain that they attempted to call the Monitor's help line multiple times or submit requests for ballots online, but that they have still not received ballots.

One UAW member in New York wrote me to say, "I have reached out to 4 people about this." The worker said "I never received a ballot" after calling the help line "multiple times." "I've also requested a ballot via the link that I was sent but I still have received nothing in the mail."

Another UAW member from Local 551 said they still had not received a ballot despite making their initial request for one over two weeks ago and calling the hotline three times. A member from Local 79 said, "If I could get a ballot I would vote, I've asked twice for a ballot and haven't got one." This is clearly a common experience and unless it is addressed it risks disenfranchising thousands and thousands of members.

3. Workers report UAW officials are telling them the deadline to mail ballots was October 28

Workers in at least two plants—GM Arlington in Texas and Mopar in Centerline, Michigan—are informing my campaign that UAW officials are telling eligible voters that the deadline to mail in their ballot was October 28, and that they need not send their ballots now because it is too late. This is not the correct deadline. If an investigation confirms what workers report, this would amount to a violation of federal law and of workers' right to vote.

4. No accountability for the UAW's false claim that TPTs cannot vote

TPTs in at least two Stellantis plants—Detroit Assembly Complex - Jefferson and Detroit Assembly Complex - Mack in Detroit—reported that UAW officials are spreading rumors that TPTs are ineligible to vote. This would be a lie aimed at suppressing the vote of the most poorly treated workers. My campaign notified your office of this on November 1, and you responded to say you had requested that UAW local inform their member that TPT can vote and that ballot must be sent by November 18.

But your office has not said what *specific* measures are being taken to ensure the UAW locals actually do inform their memberships of impending deadlines and of TPT voter eligibility in an effective way. Placing notices on websites nobody goes to does not count as providing fair notice. The absence of any real enforcement mechanisms would mean the UAW apparatus is not being held accountable for what would be a violation of federal law.

There is evidence that the UAW apparatus is not taking action to clarify any confusion.

The UAW International has not even published anything on its website nor has it even issued a single communication informing members of impending deadlines or of the right of TPTs to vote on its official Twitter and Facebook pages.

For example, Local 7 (the local for the Stellantis Jefferson plant) has published a statement on its website about the election which does not state that TPTs have the right to vote. Its "Events calendar" still makes no reference to any impending deadlines. A review of all local websites and social media pages shows the overwhelming majority do not reference either issue. It is clear as day that the UAW is trying to keep workers from learning about the election.

5. Ray Curry campaign found to have violated election rules

How can the UAW be in charge of correcting these issues when your office has just ruled that the Ray Curry campaign is violating federal law by using UAW resources to promote Curry's campaign? In an email dated November 9, your office informed my campaign about "an Election Rules violation by the Curry Solidarity Team Slate."

You wrote that after an investigation, the Monitor ruled that the Curry team violated federal law by sending a campaign email to hundreds of workers on a list that was "obtained from a Union resource." You wrote that "The Curry Solidarity Team Slate violated Election Rule 4-6, which makes clear that federal law prohibits the use of Union resources, including contact lists that were created or compiled as part of official duties or functions, to promote the candidacy of any person in a Union election."

6. UAW making no effort to inform workers of the imminent deadline for requesting a ballot

The UAW apparatus is making no real attempt to inform workers that they can request ballots if they have not received them yet. On the contrary, it seems they do not want workers to know the deadline for requesting a ballot is only two days away. The UAW website does not make any reference to requesting ballots for workers who have not received them yet, at least not one that is easy to access from their front page.

The UAW's official Twitter account has not issued a single tweet about this. In fact, the UAW's official Twitter account has only made a few tweets *all year* about the UAW elections, compared with 47 tweets promoting Administration Caucus candidate Ray Curry. Few UAW locals have information on their websites about requesting ballots, and those that do fail to mention that the deadline for requesting a new ballot is November 11.

7. UAW official intimidated voters at plant in Elizabethtown, Kentucky

Last week, workers at the Metalsa parts plant in Elizabethtown, Kentucky, were intimidated from speaking to my campaign volunteers by UAW Local 3047 official Gary Parr, who called company security and began taking photos of nearby license plates in an attempt to intimidate workers from learning about my campaign. A similar act of intimidation took place in August, when a UAW Local 598 official instructed someone to photograph workers who had been talking to me about my campaign at GM Assembly in Flint, Michigan.

8. July 19 Monitor Status Report said UAW apparatus was violating consent decree

What workers report is extremely concerning. The consent decree says there must be a fair, direct election, but your office already held that the UAW apparatus has violated the consent decree.

That status report your office issued on July 19, 2021 says that "the Monitor uncovered evidence that the Union's leadership and its then-lawyers were concealing from the Monitor an investigation by the Union into the mishandling" of union money. When incumbent candidate for UAW president Ray Curry refused to disclose critical information to your office, you wrote that the Department of Justice told Curry he would "face action from the Department of Justice." Your office also said there were 19 open investigations, including five new investigations in recent months.

Serious action must be taken. Only 8 percent of UAW members have voted and your office has ruled the Curry slate is violating the election rules. It is necessary to guarantee that every single eligible voter actually knows an election is taking place, that urgent measures be taken to ensure every single eligible voter receives a ballot at the correct address with enough time to mail it back, and that these matters be communicated to the entire UAW membership in a way that is guaranteed to actually inform them of their rights.

Sincerely,

Will Lehman



William Lehman <willforuawpresident@gmail.com>

Request for delay in ballot deadline

3 messages

Will for UAW President <willforuawpresident@gmail.com>

Fri, Nov 11, 2022 at 10:34 AM

To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>, "UAWMonitor_Election@stoneturn.com" <uawmonitor_election@stoneturn.com>

Dear Mr. Barofsky:

I write to request an immediate 30-day delay in the deadline for voting. Nothing short of this will protect the right of workers to vote given the massive problems that appear to exist with workers receiving their ballots. In addition to the evidence I've sent you already in previous emails (which you haven't adequately responded to), below are just a handful of the concerns I've received in the last 24 hours from workers about not receiving ballots. Workers who did not want to be named are fearful of retribution from the UAW bureaucracy.

Worker 1. "I live in Sanilac County [Michigan] and I didn't get my ballot. I called the Monitor a week ago, and they told me seven to ten days. I haven't gotten it."

Worker 2. "I didn't get a ballot, so I requested one and we'll see how it goes. I didn't realize that I didn't have it until yesterday, and I requested it yesterday." [See video of the first two speaking [here on Twitter.](#)]

Worker 3. "I did not get a ballot, but I got some text from some guy, so I went on the link on October 29 to request a ballot and I still have not gotten one in the mail. So I don't know." [See [video here.](#)]

Worker 4. "I've gone to the website at least 3 times and called them at least 6 times. The first time I called the UAW Monitor, it was 2 days after the first day you were supposed to call, around October 29th. We were told to wait till after the 27th to call the Monitor. The first call, it just rang, nobody answered. I let it ring — 855-433-8683 — forever and gave up. Then I called back the same day, later in the day and it rang and rang and rang and rang and finally somebody picked up. I told them I was ringing earlier and no one picked up and they were befuddled. I told them I hadn't received the ballot. They asked my name and local. They asked me if my address was some street number and the state being Michigan and I've never lived in Michigan, and I've never lived outside of Indiana.

"After that call, the very next day, maybe two days later, someone called me to verify that I called and verified my address again. Hours later, I got another phone call from someone else that didn't know I got a call to verify my address. My address was verified two times in one day and both times they called me. The second time they called me, I told them somebody already called. I said, 'But go ahead and verify again and send my ballot.' She chuckled a bit. She said there are two people with the exact same name in two different states, yourself and this other person. After that she said it's fixed and I should be getting my ballot soon. She didn't say when, just soon. That's been two weeks ago.

"After that, I went to the link online [[uawvote.com](#)]. I went to that link and clicked the button 'Request a ballot'. It made me verify my name and address and my email and my phone number and it sent me a verification email to make sure that was my phone number that I used. I opened the email and confirmed. After that there was a different [dot.com](#) that was sent to me...this was the Facebook page. One of the 551 Facebook pages, somebody has posted a 'If you hadn't received your ballot...' I clicked on it, it sent me to the one similar, but slightly different. I can't remember exactly what it said. It made me verify my address.

"Today [November 9] I called them again. I called once. Nobody answered. It just rang. And it said they are open 8-8PM Eastern. And it was 6PM Central, 7PM Eastern when I called. They should have answered. They didn't. And then I went to the website too. There is no voicemail for the system. They asked us to push 1 during the hours and 2 after hours."

"Another UAW member from Local 551 said they still had not received a ballot despite making their initial request for one over two weeks ago and calling the hotline three times.

“If Will doesn’t win, something needs to be done. Will’s voters are being targeted.”

Worker 5. “As a UAW member, I was one of those people who was told in October that I would get a ballot in the mail, and didn’t receive one. If my memory serves me right, I then got an email recently with a link telling me how to request a ballot if I never received one. I followed the link and requested one. I received it on November 4. I made it a point to look at the cancellation stamp on the ballot envelope, it was dated October 29.

“My purpose of this email is just to help you keep tally on the problems that have appeared on what should have been a simple task. I’m not a mathematician but I would guess less than 2% of all ballots mailed out would have gotten lost by the postal service. If so many of the membership never received their ballots, that tells me that somebody never sent them out in the first place.”

Worker 6. “I’ve been a UAW member for 16+ years, I’ve never had the opportunity to vote. I haven’t received a ballot as of yet. I’m more than a little concerned.”

Worker 7, from ACT-UAW Local 7902. “I originally did not receive any ballot for the international election, which prompted me to write to my local ACT-UAW 7902 representative, Brian Allen, as to whether I am eligible to vote for the UAW international election. Despite an earlier unrelated question in the past, he refused to respond. I then received an email blast from the local representative Zoe Carey, apparently acknowledging that some members did not receive ballots. It stated, ‘We have heard from some members of our union that they have not received their paper ballots yet. Please check your mail for a ballot from the UAW.’ Eventually a paper ballot showed up in the mail, but was sent to my old address and forwarded to my new address resulting in a significant delay. Note that the ballot was sent to my old incorrect address even though I successfully received election-related literature (mostly postcards from UAW candidates) at the new, correct address.

“With respect to voting, my local previously held a strike vote and I did not ever receive a ballot for that. Upon bringing this to their attention, my local union representative, Brian Allen, responded, ‘unfortunately those with less than 40 contact hours this semester are not eligible to vote, as they are not technically eligible for the bargaining unit.’ I teach one class per semester—the same part time situation that many or even most of the membership of ACT-UAW Local 7902 are in. I filled out a union membership card and never heard back one way or another. In the over 10 years that I have held my adjunct teaching position, I never heard of a 40-hour threshold, and also was never notified that I am not a member of the bargaining unit. To the contrary, I corresponded numerous times over the years with Local 7902 representatives concerning questions and grievances. I was never notified of my status with the local or the rights afforded to me by said status.”

Based on this and other evidence I request on behalf of the 90 percent of UAW members who have not yet cast a ballot that:

1. The deadline for requesting a new ballot be extended 30 days.
2. The deadline to postmark a ballot be extended 30 days.
3. Serious, effective measures finally be taken to notify the **entire** membership of its right to vote.

Will Lehman

Dear Mr. Lehman,

Thank you for your emails of November 9, 10, and 11. We are reviewing and will provide a more comprehensive response to the concerns expressed in those communications in a separate email soon. However, if you are aware of any eligible member who has not yet received a ballot, we would ask that you inform them to request one online at [Ballot Request Merriman River Independent Monitor of the UAW \(uawvote.com\)](https://uawvote.com) or by emailing the Monitor's Hotline directly at UAWMonitor-Election@jenner.com by midnight tonight. If you are aware of members with other unaddressed concerns, we would ask that you request that they also contact the Monitor's Hotline directly so that we can remedy any issues as soon as possible.

Best,

UAW Monitor Elections Team

From: Will for UAW President <willforuawpresident@gmail.com>
Sent: Friday, November 11, 2022 11:35 AM
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>; UAWMonitor_Election@stoneturn.com
Subject: Request for delay in ballot deadline

External Email - Do Not Click Links or Attachments Unless You Know They Are Safe

[Quoted text hidden]

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Sat, Nov 12, 2022 at 2:18 PM

Dear Mr. Barofsky:

My campaign has been doing that already for weeks, but it isn't working, as I've been trying to tell you without response. More and more workers are complaining to my campaign that the link and phone number didn't work before the deadline expired, that they've requested ballots many times but still haven't received one. This is a massive deprivation of workers' right to vote!

I hope your response to my many emails demanding action is "soon" as you promise, and I hope you grant the requests I made, because nothing short of that is going to address the ongoing issues. But by Monday already a week will have gone by since my November 9 email, and now the deadline to request ballots has passed. Last night workers reported to me that the website was down even before the deadline, and when they called before 8 pm nobody answered. More and more workers are writing to my campaign to ask that we do something to help them because the Monitor isn't. Every day that passes is a day that more workers' rights are violated.

In addition to the many testimonies I have already sent you, see additional testimony below.

Will Lehman

--"I am a worker at ford kentucky truck plant in Louisville, KY and a member of uaw local 862. I was hired Jan 18, 2022 and converted to full time Jan 31, 2022. I am trying to vote and haven't received a ballot. I've called the monitor number, emailed my union financial secretary to verify my info, and requested a ballot online starting back on October 24th. I've tried multiple times. Still no ballot. I'm afraid I'm not the only one. Seems to me that the only ones receiving ballots are the ones that are voting for a certain candidate. What can I do to make sure I get to vote? This is beyond corrupt and I see now that it trickles down from the top all the way to the local level. Please help!"

--"The whole thing is a joke. Sadly I don't feel this election is very well organized & thousands of membership uneducated on who the candidates actually are or represent - thank you for highlighting some of the quirks in this election."

--"My name is Sherman Gray, I'm the vice president of UAW Local 1302. I would like to report that management is being sent ballots in the UAW elections, and they may be voting. I'm not showing bias to any candidate, but this isn't right and workers should know about it.

"At our local, we had managers come and bring us ballots with their names and home addresses on it in October. They told us, "These just showed up in the mail, we don't know what to do about it." So, I turned it into the Monitor and the UAW international and asked them why management got to vote in our election and why ballots were being sent to them. I haven't heard anything back. We gave them our personal info and asked for advice. We got radio silence. This would have been shortly after October 17 when ballots first went out.

"It isn't an isolated thing. There are reports all over of managers getting 2 ballots even. It was multiple managers who came to us with this, there are a bunch of them. It's unfair because workers still haven't even gotten ballots. Our committee chair had to request a ballot, and he's been a committee chair for 15 years. It's a mess. I don't like it. We sit at UAW conferences, and UAW always says "the ballot box is the key," but we don't even get to vote for IEB office.

"These managers who said they got ballots are not former workers. We thought that at first too, that it could be guys that were originally in our unit and got promoted, but that's not the case. They were just straight-up management. And these were only the guys who came forward, I don't know how many got ballots but did not come forward. I don't know what happened to the ballots, either. They were returned to the local, but it's possible they could have been mailed in by someone else.

"In my opinion everyone has to vote, and it has to be fair. Ballots can't be going out to people that are not members of the union. That's our dues money that's paying the Monitor, but what are they doing? They never responded to me."

--"It's November 11, I have requested a ballot 2 times online and called now. I still have no ballot. This is because we got a bunch of Liars in our Unions I have nothing left for this Union it's CORRUPT, it's [expletive] and I'm pissed nobody's listening and them [expletives] will get back in because they are not for workers.

"A lot of people at PDC haven't gotten them. We told our committee man and he was no help."

She said she filled out the form on October 31 and November 3rd, "and I called on the November 9th. it still might come but it pisses me off that I've had to request 3 time's total."

When she called, they said "supposedly my zip code was wrong. I said to her really I don't think that's the problem but ok just send me my ballot."

[Quoted text hidden]

Additional testimony

1 message

William Lehman <willforuawpresident@gmail.com>
To: UAW Monitor-Election <UAWMonitor-Election@jenner.com>

Thu, Nov 17, 2022 at 9:52 AM

Hello,

You have not replied to previous indications by workers of election problems, but here is more testimony.

REPORTS OF BALLOT ISSUES RECEIVED BY WILL LEHMAN

(Those workers whose names are not included were fearful of facing retribution from the UAW and did not want to be publicly identified, even after being notified of their rights under the UAW election rules)

- “I went on a link on October 29th and I still haven’t gotten a ballot. In my honest opinion, this whole thing is corrupt. It needs to be fixed.”—Tom Bauer, Local 140, Stellantis Warren Truck Assembly Plant
- “I have not received a ballot. I called and talked with UAW Vote Center and I was assured both times a ballot would be sent out, but have not received one.”—John Brooks, Local 140, Stellantis Warren Truck Assembly Plant
- “I never got a ballot. I think it’s all bad. They’re doing us TPT’s wrong. Every week they’re switching us around, using us when they need us. They don’t care. We need new people in office. They don’t want us to have a voice.”—Ebony Stewart, Local 140, Stellantis Warren Truck Assembly Plant
- *Tiffney, (Stellantis Jefferson North Assembly Detroit UAW Local 7): “The time frame to vote is narrowly coming to an end. I have not received my ballot (as of Nov 13) over a week ago I contacted the monitor. I have yet to receive a ballot and the issue is its thousands of people who haven’t gotten a ballot and we vote this week. I feel more time is needed to give workers every opportunity to vote.”
- Becky Sutherland, UAW 598, GM Flint Assembly, “I have not received my UAW ballot as of November 15, 2022.”
- A Local 551 worker whose coworker did not get a ballot as of November 16: “He just now responded and said he didn't get it”
- After spending weeks trying to get a ballot by calling the Monitor close to 10 times, a worker got 2 ballots mailed to their address: “I got it. 2 actually.”
- “I havent received a ballot, can I fill it out online?” – Torin Perreyclear, University of California San Diego, Nov. 16
- “I still have NOT received a ballot even after requesting a ballot.” – John Maser, Nov. 16
- “I never received a ballot to vote. UAW local 869 member. Where can I get a ballot? – Delores Goodson, Local 869, Nov. 16

- "It's November 11, I have requested a ballot 2 times online and called now. I still have no ballot. This is because we got a bunch of Liars in our Unions. this Union it's CORRUPT, it's BS and I'm pissed nobody's listening. A lot of people at PDC haven't gotten them [ballots]. We told our committee man and he was no help."

The worker said she filled out the form on "October 31, November 3rd and I called on November 9th. it still might come but it pisses me off that I've had to request 3 time's total."

When she called the monitor hotline, she said they told her "Supposedly my zip code was wrong. I said to her really I don't think that's the problem but ok just send me my ballot."

As of Tuesday, November 15, she said she had still not received her ballot.

--Melissa Sorrells, John Deere North American Parts Distribution Center (NA-PDC), Local 79

- I am Alexander Novokhodko, a UAW4121 member and departmental steward. I am contacting you because myself and many in my department report receiving no ballot to vote in the UAW election, despite filing replacement ballot requests prior to the deadline.

Based on your campaign emails, others have reached out to you about similar issues, so I wanted to reach out to let you know that we are experiencing similar problems.

I have also emailed the monitor about this issue.

Thank you,
Sincerely,
Alexander Novokhodko
UAW4121

- "I do not have a ballot, and the online form to request one is now closed. If there is some way for me to receive a ballot in time, you have my vote, and in either case, my respect."—Tina Hyland Local 2865, San Diego, CA
- "Will I am a 3rd generation ford worker. In my household alone we have 3 uaw members and we all filled out our ballots with your name for president. I was wrongfully terminated from Ford on September 18th, 2022 and my local UAW leadership is supposedly working to get my grievance heard and get my job back. I'm concerned that my vote won't count in this election due to my recent termination. We need the change you stand for and every vote is crucial. I need to know if there's something I need to do to ensure that my vote counts." – Craig Harvey, Oct. 27
- "I've been a UAW member for 16+ years, I've never had the opportunity to vote. How do I get a ballot ??” William Decker
- "Have not received a ballot” - Katheryn Quijada-Polanco, UCLA, Nov. 15
- "I'm a retired ford worker 36 yrs Douglas Louthan 862 Kentucky Truck Plant and I have not gotten a ballot. Please send a ballot” – Douglas Louthan, Local 862, Nov. 15
- "I am an Electrician at the GM Arlington plant, Local 276. I and most of my fellow skilled tradesmen have not received a ballot. I called the number to request a ballot on October 28, and was told it would be 7-10 days. As of today 11-12-22, I still do not have a ballot. On Monday 11-7-22, as I was entering the plant, my shop chairman was handing out Curry literature at the gate. I told him

about the problem with the ballots, and he said that was happening a lot but didn't seem too interested. I find this really strange since the Union has my address correct, because I receive the issues of Solidarity magazine, including the latest issue with the candidates. One man one vote is not really true if we don't get a ballot. Is there a protest procedure? I would be interested. Thanks, Lonny Acker” – Lonny Acker, GM Arlington, Local 276, Nov. 12

- My name is Jennifer Brown. I am a worker at ford kentucky truck plant in Louisville, KY and a member of uaw local 862. I was hired Jan 18, 2022 and converted to full time Jan 31, 2022. I am trying to vote and haven't received a ballot. I've called the monitor number, emailed my union financial secretary to verify my info, and requested a ballot online starting back on October 24th. I've tried multiple times. Still no ballot. I'm afraid I'm not the only one. Seems to me that the only ones receiving ballots are the ones that are voting for a certain candidate. What can I do to make sure I get to vote? This is beyond corrupt and I see now that it trickles down from the top all the way to the local level. Please help! Best wishes, Jennifer Brown” – Jennifer Brown, Ford Kentucky Truck, Local 862, Nov. 11.
- “I have not received a ballot yet and went on the online web site to request one. I would like to know why we could not vote at are halls?thanks for updates” – Paul Rhoades, Nov. 9, 2022.
- As a UAW member, I was one of those people who was told in October that I would get a ballot in the mail, and didn't receive one. If my memory serves me right, I then got an email recently with a link telling me how to request a ballot if I never received one. I followed the link and requested one. I received it on November 4. I made it a point to look at the cancellation stamp on the ballot envelope, it was dated October 29. My purpose of this email is just to help you keep tally on the problems that have appeared on what should have been a simple task. I'm not a mathematician but I would guess less than 2% of all ballots mailed out would have gotten lost by the postal service. If so many of the membership never received their ballots, that tells me that somebody never sent them out in the first place. Sincerely, Frank T Hensley Local 862” – Nov. 9
- “At the time of this email I have not received my ballot, whom do I contact to get one?” – Ted Bey, Nov. 7
- I have reached out to 4 people about this. I never received my ballot. How can I get one? Thank you, Grace E. Mangum Adjunct, SPS MS Integrated Marketing program” – Grace Mangum, NYU, Nov. 3
- “I live in Sanilac County [Michigan] and I didn't get my ballot. I called the Monitor a week ago, and they told me seven to ten days. I haven't gotten it.” [See video of worker speaking [here](#) on Twitter.]
- “I didn't get a ballot, so I requested one and we'll see how it goes. I didn't realize that I didn't have it until yesterday, and I requested it yesterday.” [See video worker [here](#) on Twitter.]
- “I did not get a ballot, but I got some text from some guy, so I went on the link on October 29 to request a ballot and I still have not gotten one in the mail. So I don't know.” [See video of worker speaking [here](#) on Twitter.]
- “I've gone to the website at least 3 times and called them at least 6 times. The first time I called the UAW Monitor, it was 2 days after the first day you were supposed to call, around October 29th. We were told to wait till after the 27th to call the Monitor. The first call, it just rang, nobody answered. I let it ring — 855-433-8683 — forever and gave up. Then I called back the same day, later in the day and it rang and rang and rang and rang and finally somebody picked up. I told them I was ringing earlier and no one picked up and they were befuddled. I told them I hadn't received the ballot.

They asked my name and local. They asked me if my address was some street number and the state being Michigan and I've never lived in Michigan, and I've never lived outside of Indiana.

“After that call, the very next day, maybe two days later, someone called me to verify that I called and verified my address again. Hours later, I got another phone call from someone else that didn't know I got a call to verify my address. My address was verified two times in one day and both times they called me. The second time they called me, I told them somebody already called. I said, ‘But go ahead and verify again and send my ballot.’ She chuckled a bit. She said there are two people with the exact same name in two different states.”

• “I am an electrician at the GM Arlington plant, Local 276. I and most of my fellow skilled tradesmen have not received a ballot. I called the number to request a ballot on October 28, and was told it would be 7-10 days. As of today 11-12-22, I still do not have a ballot. On Monday 11-7-22, as I was entering the plant, my shop chairman was handing out Curry literature at the gate. I told him about the problem with the ballots, and he said that was happening a lot but didn't seem too interested. I find this really strange since the union has my address correct, because I receive the issues of Solidarity magazine, including the latest issue with the candidates. One-man one-vote is not really true if we don't get a ballot.”

● “A lot of TPTs [temporary part-time workers] haven't gotten ballots, and the UAW is not telling them they can vote and they are not telling retirees they can vote,” a Local 51 worker in Detroit said.

● “The time frame to vote is narrowly coming to an end. I have not received my ballot, and over a week ago I contacted the monitor. Thousands of people haven't gotten a ballot and we vote this week. I feel more time is needed to give workers every opportunity to vote.”

Local 7, Detroit.

● “I did not receive a ballot for the UAW election,” a retired GM Flint worker said, “however I did receive a ballot when workers could vote on one-member, one vote. Until a few years ago, I used to receive Solidarity Magazine. I tried several times to reach the UAW to get a ballot, but nothing. I have not received a ballot along with many other workers.

“It seems that the monitor represents the UAW officials, not the rank and file. I agree the ballot deadline must be extended. I want my ballot, but by the time I get it, it will be too late, unless the deadline is extended. I believe I did not get a ballot because I've been targeted by the UAW bureaucrats because I have not stopped fighting them for 22 years regarding grievances relating to sexual harassment. When Will wins the election, and I'm praying that he does, I want him to be aware of the many documents of my case of mishandled sexual harassment. I am not the only one who has been wronged by the UAW bureaucrats. We all have to be included, heard, and made whole.”

● A worker at the Stellantis Warren Truck Assembly Plant told supporters of Will Lehman, “I live in Sanilac County [80 miles north of the plant], and I didn't get my ballot. I called the Monitor a week ago, and they told me it would take seven to 10 days. I haven't gotten it.”

● “I went on the link on October 29 to request a ballot, and I still have not gotten one in the mail. So, I don't know.”

● “I have reached out to 4 people about this. I never received a ballot” after calling the help line “multiple times.” “I've also requested a ballot via the link that I was sent, but I still have received nothing in the mail.”—New York UAW member

- A member from Local 79 said, “If I could get a ballot I would vote, I’ve asked twice for a ballot and haven’t got one.” Local 79, Norfolk, VA.
- I read your blast about voting. I’m not sure if my situation falls into the scope of what you said. Despite paying dues, I was told that I’m not a member of my local bargaining unit because I am not working more than 40 contact hours this semester (I’m an adjunct at NYU). I was told I cannot vote in a recent strike vote. Although they didn’t explicitly say that I cannot vote for elections, I think the “not a member of the bargaining unit” comment confirms that I will not be voting in the election either. I don’t know if I am considered a temporary part time worker, but I’m definitely a part time worker. I’ve been doing this job for 10 years.

Thank you.

Regards,
Cory Plock
UAW Local 2110

- “Just received my ballot for UAW election and so did my deceased wife she has been dead 6 years. Just thought I would give you a heads up thanks for your work you have my support” – Ed Baum, Oct. 22
- “Though I heard about the UAW elections too late to be able to request a ballot, I very much support your leadership campaign and hope you win.” - Nathan Marshall, University of California, Nov. 16
- “Multiple people in our CCA have not ever even received any emails and are asking who are these candidates...sadly I don’t feel this election is very well organized & thousands in the membership are uneducated on who the candidates actually are or represent. Thank you for highlighting some of the quirks in this election.”