

MAJORITY MEMBERS:

TIM WALBERG, MICHIGAN, *Chairman*

JOE WILSON, SOUTH CAROLINA
VIRGINIA FOXX, NORTH CAROLINA
GLENN THOMPSON, PENNSYLVANIA
GLENN GROTHMAN, WISCONSIN
ELISE M. STEFANIK, NEW YORK
RICK W. ALLEN, GEORGIA
JAMES COMER, KENTUCKY
BURGESS OWENS, UTAH
LISA C. MCCLAIN, MICHIGAN
MARY E. MILLER, ILLINOIS
JULIA LETLOW, LOUISIANA
KEVIN KILEY, CALIFORNIA
MICHAEL RULLI, OHIO
JAMES C. MOYLAN, GUAM
ROBERT F. ONDER, JR., MISSOURI
RYAN MACKENZIE, PENNSYLVANIA
MICHAEL BAUMGARTNER, WASHINGTON
MARK HARRIS, NORTH CAROLINA
MARK B. MESSMER, INDIANA
RANDY FINE, FLORIDA



COMMITTEE ON
EDUCATION AND WORKFORCE
U.S. HOUSE OF REPRESENTATIVES
2176 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6100

MINORITY MEMBERS:

ROBERT C. "BOBBY" SCOTT, VIRGINIA,
Ranking Member

JOE COURTNEY, CONNECTICUT
FREDERICA S. WILSON, FLORIDA
SUZANNE BONAMICI, OREGON
MARK TAKANO, CALIFORNIA
ALMA S. ADAMS, NORTH CAROLINA
MARK DESAULNIER, CALIFORNIA
DONALD NORCROSS, NEW JERSEY
LUCY MCBATH, GEORGIA
JAHANA HAYES, CONNECTICUT
ILHAN OMAR, MINNESOTA
HALEY STEVENS, MICHIGAN
GREG CASAR, TEXAS
SUMMER L. LEE, PENNSYLVANIA
JOHN MANNION, NEW YORK
YASSAMIN ANSARI, ARIZONA

June 24, 2025

April Verrett
President
Service Employees International Union
1800 Massachusetts Avenue, NW
Washington, DC 20036

Dear Ms. Verrett:

The Committee on Education and Workforce (Committee) is investigating the hiring practices of the Service Employees International Union (SEIU) and those of its locals as they pertain to the hiring of registered sex offenders. The Committee has recently learned that an SEIU local hired a registered sex offender to serve as its business agent. Given the vulnerable populations many SEIU workers serve, the Committee seeks to understand how this occurred and whether reforms to the *Labor-Management Reporting and Disclosure Act* (LMRDA) are necessary.

On June 11, the Daily Caller News Foundation published an article about SEIU Local 87's (Local 87) hiring of Ms. Noelia Linares to be a business agent.¹ According to the article, Ms. Linares pleaded "no contest" in 2018 to sex crimes involving a minor following her 2017 arrest at South San Francisco High School, where she was a teaching assistant for bilingual students. The article states, "Authorities charged her with unlawful sexual intercourse with a minor, showing pornography to a minor and several other crimes related to her interactions with four alleged victims at the school."² Ms. Linares is now on California's sex offender registry with a crime description of sex penetration with foreign object of a victim under 18 years of age.³ Further, by the time of Ms. Linares' hiring by Local 87, her crimes had been covered by press outlets, thereby providing Local 87 with notice that it was hiring a sex offender to be a business agent.⁴

¹ Hudson Crozier, *Union Tied to Anti-ICE Riots Hired Child Molester to Top Local Chapter Role*, DAILY CALLER NEWS FOUND., June 11, 2025, <https://dailycaller.com/2025/06/11/exclusive-union-anti-ice-hired-child-molester-top-local-chapter-san-francisco-california-seiu/>.

² *Id.*

³ STATE OF CALIFORNIA, DEP'T OF JUSTICE, MEGAN'S LAW WEBSITE, <https://www.meganslaw.ca.gov/>.

⁴ See Sophie Haigney, *Police: South San Francisco School Worker Had Sex With Minor*, S.F. CHRON., Dec. 19, 2017, <https://www.sfchronicle.com/bayarea/article/Police-South-San-Francisco-High-school-worker-12442804.php>; *South City Teacher Charged for Sexual Misconduct*, DAILY J., Jan. 17, 2018,

Local 87's decision to hire Ms. Linares in 2022 to serve as a business agent should be a matter of deep concern to the millions of workers that SEIU represents. SEIU has a membership of approximately 2 million, with many working directly with vulnerable populations.⁵ This includes more than 1.1 million workers responsible for more than 60 million patients in hospitals, health centers, nursing homes, and in-home care settings.⁶ Additionally, SEIU touts itself as "the second largest union of public service employees with more than 1 million local and state government workers, public school employees, bus drivers, and child care providers—including 80,000 early learning and child care professionals."⁷

To assist the Committee in its investigation of the hiring practices of SEIU and those of its locals as they pertain to the hiring of registered sex offenders, provide the following information by no later than July 9:

1. The number of all employees of SEIU and its locals who are registered sex offenders, including their positions within SEIU or its locals.
2. The policies and procedures of SEIU and its locals for determining whether a job applicant is a registered sex offender.
3. The policies and procedures of SEIU and its locals when they become aware that an employee has been ordered to register as a sex offender.

The hiring practices of unions and their leadership are important to the Committee as such hiring relates to the integrity of a union and sets an example for their dues paying members. Indeed, the LMRDA already prohibits individuals convicted of certain crimes, including rape and serious forms of assault, from holding office in labor unions.⁸ As such, the Committee is investigating this matter to better determine whether the LMRDA should be amended to include registered sex offenders among those prohibited from holding office in a labor union. The Committee has jurisdiction over "labor generally," as set forth in House Rule X.⁹ Your responses to the Committee's requests may provide important assistance to Congress in determining whether legislative changes are warranted.¹⁰

https://www.smdailyjournal.com/news/local/south-city-teacher-charged-for-sexual-misconduct/article_5f41918c-fb34-11e7-aacd-9b4014e4c3ae.html.

⁵ SEIU, ABOUT US, <https://www.seiu.org/about/>.

⁶ SEIU, WHAT TYPE OF WORK DO SEIU MEMBERS DO?, <https://www.seiu.org/cards/these-fast-facts-will-tell-you-how-were-organized/>.

⁷ SEIU, WELCOME TO THE 2024 SEIU INTERNATIONAL CONVENTION (May 19, 2024), <https://convention.seiu.org/division/public-services-division/>.

⁸ See 29 U.S.C. § 504 (prohibition against certain persons holding office in a labor union).

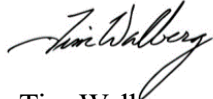
⁹ Rules of the U.S. House of Representatives, Rule X cl. 2(b)(1)(A) (119th Cong.) (2025).

¹⁰ See *Trump v. Mazars USA*, 591 U.S. 848, 863 (2020) (internal citations omitted).

April Verrett
June 24, 2025
Page 3

If you have any questions about this request, please contact Committee staff at 202-225-4527.
Your prompt attention to this investigation is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Walberg", written in a cursive style.

Tim Walberg
Chairman

Enclosure

Responding to Committee Document Requests

1. The Service Employees International Union's (SEIU) response to questions and request(s) should be answered or provided in a separate document and not included inside a narrative response.
2. In complying with this request, you should produce all responsive documents that are in SEIU's possession, custody, or control, whether held by you or other past or present employees of SEIU, or a representative acting on your behalf. Your response should also produce documents that you have a legal right to obtain, that SEIU has a right to copy or to which you have access, or that you have placed in the temporary possession, custody, or control of any third party.
3. Records, documents, data, or information that have been requested and/or are related to underlying requests should not be destroyed, modified, removed, transferred or otherwise made inaccessible to the Committee on Education and Workforce (the "Committee").
4. If any entity, organization, or individual denoted in this request has been, or is also known by any other name than that herein denoted, the request shall be read also to include that alternative identification.
5. The Committee's preference is to receive documents in electronic form (i.e., email, CD, memory stick, or thumb drive) in lieu of paper productions. To the extent responses are provided in paper form, any documents that are stapled, clipped, or otherwise fastened together should not be separated. Documents produced in response to a request should be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this request was issued.
6. Regardless of format, documents produced pursuant to this request should be produced in the order in which they appear in your files and should not be rearranged. Indicate the office or division and person from whose files each document was produced.
7. Regardless of format, documents produced to the Committee should include an index describing the contents of the production and a total page count for the entire production. To the extent more than one CD, hard drive, memory stick, thumb drive, box or folder is produced, each CD, hard drive, memory stick, thumb drive, box, or folder should contain an index describing its contents. Documents produced in electronic format should also be identified and indexed electronically.
8. Electronic document productions should be prepared according to the following standards:
 - (a) The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.

- (b) Document numbers in the load file should match document Bates numbers and TIF file names.
 - (c) If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
- 9. All documents shall be Bates-stamped sequentially and produced sequentially.
- 10. When you produce documents, you should individually identify the paragraph, question number, or request number in the Committee's request to which the documents respond.
- 11. It shall not be a basis for refusal to produce documents that any other person or entity—either inside or outside of SEIU—also possesses non-identical or identical copies of the same documents.
- 12. If any of the requested information is only reasonably available in machine-readable form (such as on a computer server, hard drive, or computer backup tape), SEIU's staff should consult with the Committee staff to determine the appropriate format in which to produce the information.
- 13. If compliance with any request cannot be made in full, compliance shall be made to the extent possible and shall include a written explanation of why full compliance is not possible.
- 14. If SEIU does not expect to produce all documents responsive to a request by the date requested, SEIU's staff shall consult with the Committee as soon as it is known SEIU cannot meet the deadline, but no later than 24 hours before the due date to explain:
 - (a) what will be provided by the due date;
 - (b) why SEIU believes certain materials cannot be produced by the due date; and
 - (c) SEIU's proposed timeline for providing any omitted information.
- 15. If any document responsive to this request was, but no longer is, in your possession, custody, or control, or has been placed into the possession, custody, or control of any third party and cannot be provided in response to this request, you should:
 - (a) identify the document, including its date, author, subject, and recipients;
 - (b) explain the circumstances under which the document ceased to be in your possession, custody, or control, or was placed in the possession, custody, or control of a third party;
 - (c) state how the document was disposed of;
 - (d) identify the name, current address, and telephone number of the person who currently has possession, custody, or control over the document;
 - (e) state the date of disposition; and
 - (f) identify the name, current address, and telephone number of each person who authorized said disposition or who had or has knowledge of said disposition.

16. If any document responsive to this request cannot be located, identify the document and describe with particularity the efforts made to locate the document and the specific reason for its disappearance, destruction, or unavailability.
17. In the event that a document or portion of a document is withheld on the basis of alleged privilege, provide a privilege log containing the following information concerning any such document or redaction:
 - (a) Bates number(s);
 - (b) the alleged privilege asserted and the grounds therefor;
 - (c) the type of document;
 - (d) the general subject matter;
 - (e) any other description necessary to identify the document;
 - (f) the date, author, and addressee; and
 - (g) the relationship of the author and addressee to each other.

If a claimed privilege applies to only a portion of any document, that portion only should be withheld and the remainder of the document should be produced.

18. Any objections or claims of privilege are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document prior to the request compliance date.
19. In complying with the request, be apprised that (unless otherwise determined by the Committee) the Committee does not recognize: any purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative-process privilege, the attorney-client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the *Freedom of Information Act*; or any purported contractual privileges, such as non-disclosure agreements.
20. Any assertion by a request recipient of any such non-constitutional legal bases for withholding documents or other materials, for refusing to answer any deposition question, or for refusing to provide hearing testimony, shall be of no legal force and effect and shall not provide a justification for such withholding or refusal, unless and only to the extent that the Committee (or the chair of the Committee, if authorized) has consented to recognize the assertion as valid.
21. If a date or other descriptive detail set forth in this request referring to a document, communication, meeting, or other event is inaccurate, but the actual date or other descriptive detail is known to you or other SEIU employees, or is otherwise apparent from the context of the request, you should produce all documents that would be responsive as if the date or other descriptive detail were correct.
22. The time period covered by this request is included in the attached request. To the extent a time period is not specified, produce relevant documents from January 1, 2021, to the present.

23. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information, not produced because it has not been located or discovered by the return date, shall be produced immediately upon subsequent location or discovery. Such submission shall include an explanation as to why the information was not produced originally.
24. If physical documents are to be delivered, documents should be delivered to the Majority Staff in Room 2176 of the Rayburn House Office Building during Committee office hours (9am-5pm, unless other arrangements are made) and signed by a member of the staff upon delivery.
25. Upon completion of the document production, SEIU's written response should include a written certification, signed by President April Verrett or her designee, stating that:
 - (a) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and
 - (b) all documents located during the search that are responsive have been produced to the Committee.

Definitions

1. The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, inter-office and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term "documents in your possession, custody or control" means documents that are in your possession, custody, or control, whether held by you or your past or present agents,

employees, or representatives acting on your behalf; documents that you have a legal right to obtain, that you have a right to copy, or to which you have access; and/or documents that have been placed in the possession, custody, or control of any third party.

3. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, email, regular mail, telexes, releases, or otherwise.
4. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
5. The terms “person” or “persons” mean natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, business, or government entities, and all subsidiaries, affiliates, divisions, departments, branches, or other units thereof.
6. The term “identify,” when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; and (b) the individual’s business address and phone number.
7. The term “referring or relating,” with respect to any given subject, means anything that constitutes, contains, embodies, reflect s, identifies, states, refers to, deals with or is pertinent to that subject in any manner whatsoever.
8. The term “entity” includes any lawful association, corporation, partnership, proprietorship, trust, institution, or individual that has the legal capacity to: (1) enter into agreements and contracts; (2) assume obligations; (3) incur and pay debts; (4) sue and be sued in its own right; and (5) be accountable for illegal activities.
9. The term “privilege” includes, but is not limited to, any claim that a document either may or must be withheld from production pursuant to any statute, rule, or regulation.
10. The term “employee” means agent, borrowed employee, casual employee, consultant, de facto employee, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, contract employee, contractor, or any other type of service provider.
11. The term “SEIU” means SEIU, including (i) its predecessors, successors, wholly or partly owned direct or indirect subsidiaries, divisions, affiliates, local unions, boards, and joint ventures and (ii) any current, past, or future partners, officers, directors, employees, representatives, or agents of any of the above entities.

