

74 FLRA No. 49

U.S. DEPARTMENT OF AGRICULTURE
OFFICE OF THE CHIEF FINANCIAL OFFICER
NEW ORLEANS NATIONAL FINANCE CENTER
NEW ORLEANS, LOUISIANA
(Agency)

and

U.S. DEPARTMENT OF AGRICULTURE
OFFICE OF THE CHIEF INFORMATION OFFICER
NEW ORLEANS, LOUISIANA
(Agency)

and

AMERICAN FEDERATION
OF GOVERNMENT EMPLOYEES, AFL-CIO
LOCAL 2341
(Union/Petitioner)

AT-RP-25-0035

ORDER DENYING
APPLICATION FOR REVIEW

September 29, 2025

Before the Authority: Colleen Duffy Kiko, Chairman,
and Anne Wagner, Member

I. Statement of the Case

In the attached decision and order (decision), Federal Labor Relations Authority Regional Director Brent S. Hudspeth (the RD) dismissed the Union's petition seeking to amend its bargaining-unit certification to reflect

a change in affiliation from the American Federation of Government Employees (AFGE) to the National Treasury Employees Union (NTEU).¹ The RD did so because he found that the Union had failed to satisfy the procedural requirements for changing affiliation originally set forth in *Veterans Administration Hospital, Montrose, New York (Montrose)*.² The Union filed an application for review of the decision (application). For the following reasons, we deny the Union's application.

II. Background and RD's Decision

On July 8, 2025,³ the Union notified its dues-paying members, by email, of two special meetings to be held on July 10. On July 9, the Union sent additional emails reminding members of the two meetings and adding a third meeting time. The July 8 and 9 emails (notices) all included the following notice to members about the purpose of the special meetings:

[The Union] will be [h]osting [two] special [m]eetings for all of [o]ur [m]embers to have an [o]pportunity [to] [d]iscuss and [v]ote by [s]ecret [b]allot [r]elative to a [p]otential [c]hange in [o]ur [n]ational [u]nion [a]ffiliation from AFGE to NTEU. For you[r] information a [c]hange in [n]ational [u]nion [a]ffiliation should not change anything about [o]ur [l]ocal Union as we hold our own [c]ertification [l]ocally.⁴

The ballot used during the vote to change affiliation described the choice as follows:

"Yes[,] Change National Union Affiliation from AFGE to NTEU"
"No, Don't Change National Affiliation from AFGE to NTEU."⁵

¹ On March 27, 2025, President Trump issued Executive Order No. 14,251 (E.O. 14,251), which excluded from the coverage of the Federal Service Labor-Management Relations Statute the "Office of Chief Information Officer" (OCIO) for "each Executive department listed in [5 U.S.C. § 101], the Social Security Administration, and the Office of Personnel Management." Exclusions from Federal Labor-Management Relations Programs, Exec. Order No. 14,251, § 2(b) (Mar. 27, 2025), 90 Fed. Reg. 14553, 14553-54 (Apr. 3, 2025) (amending Exec. Order No. 12,171, 44 Fed. Reg. 66565 (Nov. 19, 1979)). E.O. 14,251 does not affect the statutory rights of employees of the U.S. Department of Agriculture's Office of the Chief Financial Officer (OCFO). As the caption of our order reflects, the unit at issue originally included both OCIO and OCFO employees. The RD's decision denied the petition seeking to change the unit's affiliation and, for the reasons explained in this

order, the Authority denies the application for review. The exclusion of the OCIO employees was not material for those decisions. While retaining the caption, the Authority does not address the exclusion.

² 4 A/SLMR 858 (1974), *pet. for review denied*, 3 FLRC 259 (1975).

³ All dates are from 2025 unless otherwise noted.

⁴ Email from President, AFGE, Loc. 2341, to AFGE members (July 8, 2025); email from President, AFGE, Loc. 2341 to additional e-mail addresses (July 9, 2025 09:00 PM CT) (reminder of July 10 meetings); email from President, AFGE, Loc. 2341 to backup e-mail addresses (July 9, 2025 09:19 PM CT) (additional reminder of July 10 meetings); *see also* RD's Decision at 3.

⁵ Official Ballot; *see also* RD's Decision at 3.

The members voted in favor of changing the affiliation to NTEU. The Union then filed the petition to amend its certification to reflect that change.

In his decision, the RD set forth the procedural requirements for a change in affiliation, which were initially established in *Montrose*, a decision by the Assistant Secretary of Labor for Labor-Management Relations (Assistant Secretary) prior to the enactment of the Federal Service Labor-Management Relations Statute.⁶ The RD noted that, in *Florida National Guard, St. Augustine, Florida (Fla. Nat'l Guard)*,⁷ the Authority adopted the *Montrose* requirements as its own.⁸ As relevant here, the RD stated that the Authority requires that: “a proposed change in affiliation should be the subject of a special meeting of the members of the incumbent labor organization, called for this purpose only, with adequate advance notice provided to the entire membership”; and “a vote by the members of the incumbent labor organization on the question should be taken by secret ballot, with the ballot clearly stating the change proposed and the choices inherent therein.”⁹ The RD noted that, in *Union of Federal Employees (UFE)*,¹⁰ the Authority addressed these requirements and determined that: the notice of the special meeting there, “as well as the ballot itself, failed clearly and adequately to inform employees regarding the nature of the proposed change in affiliation”;¹¹ and the notice was “so misleading that it ‘compromised the ability of the . . . members . . . to decide whether to attend the special meeting.’”¹²

The RD found the facts of the instant case similar to those in *UFE*. Specifically, the RD determined that the Union’s special-meeting notices and the ballot described the proposed change as merely a change in “national affiliation.”¹³ The RD also quoted the notices’ statement that “a [c]hange in [n]ational [u]nion [a]ffiliation should not change anything about [o]ur [l]ocal Union as we hold our own [c]ertification [l]ocally.”¹⁴ According to the RD, this statement gave “the false assurance to members that the Union would continue to hold its certification locally even if the vote was to change affiliation to NTEU.”¹⁵ In this regard, the RD found that if the members voted to change affiliation to NTEU, then NTEU would hold the certification at the national level – the Union would *not* continue to hold it at the local level. The RD noted that this change would have various ramifications, including that “members would not be able

to conduct a *Montrose* election to change its affiliation in the future.”¹⁶ The RD concluded that the Union did not “fully and adequately” inform its members of the effect of their vote.¹⁷

The RD also found that approximately fifteen percent of the Union membership attended the three meetings. He determined that the minutes from the meetings “did not contain the same language [as the meeting notices] about the Union holding its own certification locally, but they did indicate that the change would be in the ‘Union’s [n]ational [a]ffiliation from . . . AFGE to . . . NTEU.’”¹⁸ Further, the RD rejected a Union argument that it provided adequate notice because it told members during the meetings that NTEU would hold the certification. The RD found there was “no reference to such a statement in any of the meeting minutes.”¹⁹ But even assuming that the Union had clarified the choices during the meetings, the RD found that “members that did not attend the meeting[s] would not be aware of th[e] clarification and were thus deprived of the opportunity to attend th[e] meeting[s] if the loss of certification was a concern” to them.²⁰ The RD determined that “[b]ecause the purpose of the meeting was not made clear in the notices, members could not make an informed decision as to whether to attend one of the meetings” – and, therefore, “any clarification . . . made at the meetings [was] insufficient to resolve the insufficiency of the notices” of those meetings.²¹

The RD concluded that the notices and the ballot did not sufficiently inform the Union’s members of the issue to be decided, including the “specific ‘before’ and ‘after’ identities of the exclusive representative.”²² Therefore, the RD dismissed the petition.

The Union filed its application on August 22, 2025. No opposition to the Union’s application was filed.

III. Analysis and Conclusions: The RD did not fail to apply established law or commit clear and prejudicial errors concerning substantial factual matters.

The Union makes various arguments, discussed in greater detail below, that the RD erred in making particular findings and in applying certain Authority

⁶ 4 A/SLMR at 860.

⁷ 25 FLRA 728 (1987).

⁸ The requirements are set forth in full in Section III below.

⁹ RD’s Decision at 3-4.

¹⁰ 41 FLRA 562 (1991).

¹¹ RD’s Decision at 4 (quoting *UFE*, 41 FLRA at 583).

¹² *Id.* (quoting *UFE*, 41 FLRA at 575-76).

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.* at 4 n.2.

¹⁷ *Id.* at 4.

¹⁸ *Id.* at 3.

¹⁹ *Id.*

²⁰ *Id.* at 4.

²¹ *Id.*

²² *Id.* at 5 (quoting *UFE*, 41 FLRA at 575) (internal quotation marks omitted).

precedent.²³ The Union has not specified a particular ground, set forth in § 2422.31(c) of the Authority's Regulations,²⁴ for reviewing the RD's decision. However, even reading the Union's application as raising the grounds that the RD failed to apply established law²⁵ and committed clear and prejudicial errors concerning substantial factual matters,²⁶ we reject those arguments for the following reasons.²⁷

As the RD discussed, in order to amend the designation of an exclusive representative in an existing unit to reflect a change in affiliation, the procedures set forth in *Montrose* must be followed.²⁸ The Authority has stated that, in order "to assure that an amendment of certification conforms to the desires of a union's membership and that no question concerning representation exists, four procedural criteria must be met, at a minimum."²⁹ These four minimum criteria are:

(1) A proposed change in affiliation should be the subject of a special meeting of the members of the incumbent labor organization, called for this purpose only, with adequate advance notice provided to the entire membership; (2) the meeting should take place at a time and place convenient to all members; (3) adequate time for discussion of the proposed change should be provided, with all members given an opportunity to raise questions within the bounds of normal parliamentary procedures; and (4) a vote by the members of the incumbent labor organization on the question should be taken by secret ballot, with the ballot clearly stating the change proposed and the choices inherent therein.³⁰

Montrose requires that both notices of special meetings and ballots must "accurately specify the full scope of the proposed change in affiliation."³¹ Further, the ballot must clearly state the "choices inherent" in the proposed change.³² In *UFE*, the Authority upheld³³ a Regional Director's finding that a union failed to comply with *Montrose* where the union's special-meeting notices created a "false impression" regarding,³⁴ and "compromised the ability of the [union's] members to fully comprehend the ramifications of the change in affiliation and to make a reasoned choice on how to vote or even to decide whether to attend the special meeting."³⁵

The Union claims that it properly followed all of the *Montrose* procedures,³⁶ and that it was not required to specify, in its meeting notices or on the ballot, the level at which the certification would be held after the change in affiliation.³⁷ The Union also challenges the RD's finding that its members may have chosen not to attend the meetings or to vote because they mistakenly thought the change in affiliation would not affect whether the certification would continue to be held locally.³⁸ According to the Union, it is "not plausible"³⁹ and "makes no logical or legal sense"⁴⁰ to assume that was the case, and there is no evidence that any members decided not to attend for that reason.⁴¹ The Union contends that it does not call special meetings often, so its members should have understood that these meetings were important and attended one, regardless of what they assumed about the level of certification.⁴² Further, the Union argues that there is no basis for concluding that additional members would have attended or voted if additional information had been included in the notices.⁴³ In this regard, the Union asserts that its members generally are not concerned about the level at which a certification is held.⁴⁴ Additionally, the Union emphasizes that it strongly encouraged all of its members to attend and to vote, it stressed the importance of the matter,⁴⁵ and it notified employees that if they were unable to attend any of the meetings, then the Union was

²³ Application at 1-8.

²⁴ 5 C.F.R. § 2422.31(c)(1)-(3).

²⁵ *Id.* § 2422.31(c)(3)(i).

²⁶ *Id.* § 2422.31(c)(3)(iii).

²⁷ See, e.g., *Tidewater Region Mkt., Def. Health Agency, U.S. DOD*, 73 FLRA 687, 689 (2023) (finding that even if the Authority construed a party's arguments as arguing that the Regional Director failed to apply established law and committed clear and prejudicial procedural errors, the application for review should be denied).

²⁸ *Dep't of the Army, U.S. Army Corps of Eng'rs, L.A. Dist., L.A., Cal.*, 56 FLRA 973, 976 (2000) (*Army Corps L.A.*).

²⁹ *Id.*; see also *U.S. Dep't of Interior, Bureau of Land Mgmt., Phx., Ariz.*, 56 FLRA 202, 205 (2005) (stating that *Montrose* procedures were designed to ensure that an amendment of certification of an exclusive representative in an existing unit conforms to the desires of the membership of that unit).

³⁰ *Army Corps L.A.*, 56 FLRA at 976-77 (quoting *Montrose*, 4 A/SLMR at 860).

³¹ *Id.* at 977 (quoting *UFE*, 41 FLRA at 575) (internal quotation marks omitted).

³² *UFE*, 41 FLRA at 575.

³³ *Id.* at 582-84.

³⁴ *Id.* at 576.

³⁵ *Id.* at 575-76 (citation modified).

³⁶ Application at 1-5.

³⁷ *Id.* at 4-6.

³⁸ *Id.* at 2, 6-7.

³⁹ *Id.* at 2-3.

⁴⁰ *Id.* at 3-4, 7.

⁴¹ *Id.* at 4.

⁴² *Id.* at 8.

⁴³ *Id.* at 3-4, 6-8.

⁴⁴ *Id.* at 4-7.

⁴⁵ *Id.* at 2-4, 6-7.

willing to make adjustments or arrangements.⁴⁶ The Union also asserts that it never intended to mislead its members or convey that the level of the certification would not change,⁴⁷ and that dismissing the petition on the basis that the Union potentially deterred members from attending and voting, or because the notice made unclear what members were voting on, has the “potential to set a bad preceden[t].”⁴⁸

Moreover, the Union contends that, at the special meetings, it discussed the change of the level at which the certification would be held,⁴⁹ and told members about the procedures they would have to follow if they decided to change their affiliation from NTEU to a different union in the future.⁵⁰ According to the Union, the issue of the level of certification was “not one of the top most pressing questions” that its members asked about.⁵¹ Finally, the Union argues that the Authority should respect the votes of its members, who voted “overwhelmingly” for the change in affiliation.⁵²

As the RD explained, and as noted above, *Montrose* requires that prior to a meeting to change affiliation the union must provide members with “adequate advance notice” of the meeting.⁵³ The RD correctly cited *UFE* for the principle that a notice does not satisfy this requirement if it is “so misleading that it ‘compromise[s] the ability of the . . . members . . . to decide whether to attend the special meeting.’”⁵⁴ The RD found that the Union’s notices were misleading because they gave “the false assurance to members that the Union would continue to hold its certification locally even if the vote was to change affiliation to NTEU.”⁵⁵

We agree with that finding, which supports the RD’s conclusion that the Union failed to give adequate advance notice of the meetings, as *Montrose* requires. The Union’s arguments do not undercut this conclusion. The Union does not cite any record evidence that contradicts the RD’s finding that the notices could have caused some members to not attend the meetings, and the RD’s reasoning on that issue is consistent with the decision in *UFE*. Additionally, even if the Union did not intend for its notices to be misleading, that does not change the fact that they were. Further, although the Union asserts that it discussed the level-of-certification issue at the special meetings, the Union does not cite any record evidence to support that assertion – and, even if it had, that would not change the fact that the *notices* of the meetings were inadequate. None of these Union arguments demonstrates that the RD failed to apply established law or committed

clear and prejudicial errors concerning substantial factual matters.

The Union also argues that the RD misapplied *Fla. Nat’l Guard* because it is not factually similar to the instant case.⁵⁶ However, the RD did not find that *Fla. Nat’l Guard* was factually similar to this case; he cited it only to clarify that the Authority adopted the procedural requirements for an affiliation change originally set forth by the Assistant Secretary in *Montrose*.⁵⁷ The Union’s argument provides no basis for finding that the RD failed to apply established law.

For the above reasons, the Union has not demonstrated that the RD failed to apply established law or committed clear and prejudicial errors concerning substantial factual matters. Accordingly, we deny the application.

IV. Order

We deny the Union’s application for review.

⁴⁶ *Id.* at 3.

⁴⁷ *Id.* at 4-5.

⁴⁸ *Id.* at 7.

⁴⁹ *Id.* at 4-5.

⁵⁰ *Id.* at 6.

⁵¹ *Id.* at 5.

⁵² *Id.* at 6.

⁵³ *Montrose*, 4 A/SLMR at 860.

⁵⁴ RD’s Decision at 4 (quoting *UFE*, 41 FLRA at 575-76).

⁵⁵ *Id.*

⁵⁶ Application at 1.

⁵⁷ RD’s Decision at 3.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL LABOR RELATIONS
AUTHORITY
ATLANTA REGION

U.S. DEPARTMENT OF AGRICULTURE
OFFICE OF THE CHIEF FINANCIAL OFFICER
NEW ORLEANS NATIONAL FINANCE CENTER
NEW ORLEANS, LOUISIANA
(Agency)

and

U.S. DEPARTMENT OF AGRICULTURE
OFFICE OF THE CHIEF INFORMATION OFFICER
NEW ORLEANS, LOUISIANA¹
(Agency)

and

AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO,
LOCAL 2341
(Union/Petitioner)

AT-RP-25-0035

DECISION AND ORDER

I. Statement of the Case

The American Federation of Government Employees, AFL-CIO, Local 2341 (Union), filed the petition in this case seeking a change in affiliation from the American Federation of Government Employees, AFL-CIO (AFGE) to the National Treasury Employees Union (NTEU). Significantly, if the petition is granted, the certification would no longer be held by Local 2341 at the local level; instead, NTEU, at the national level, would hold the certification.

After reviewing the documentation submitted in support of the petition, I find that the petition must be dismissed because the Union failed to satisfy the requirements for changing affiliation, outlined in *Veterans Admin. Hospital, Montrose N.Y.*, 4 A/SLMR 858 (1974) (*Montrose*).

¹ On March 27, 2025, President Trump issued an Executive Order No. 14251 excluding employees of the Office of Chief Information Officer (OCIO) from the Statute. The Executive Order did not impact the Statutory rights of employees of the Office of the Chief Financial Officer (OFCO). The Executive Order is being challenged in several courts and the

II. Findings

On February 11, 2012, the Acting Regional Director of the Dallas Region certified that the Union as the exclusive representative of the following unit of employees (DA-RP-12-0025):

Included: All nonprofessional Wage Grade and GS employees of the National Finance Center, Office of Budget and Finance, U.S. Department of Agriculture, New Orleans, Louisiana, including full-time and intermittent employees, temporary full-time and permanent part-time employees, and employees serving under either career, career-conditional, or accepted appointments.

Excluded: All professional employees, management officials, supervisors, employees serving under temporary appointments for less than 90 days, stay-in-school employees and summer aides, and employees described in 5 U.S.C. 7112(b)(2), (3), (4), (6) and (7).

On April 20, 2022, the Atlanta Regional Director certified, following a reorganization, that the unit represented by the Union also includes the following group of employees (Case Nos. AT-RP-20-0027 and AT-RP-20-0028):

Included: All nonprofessional employees of the Office of Chief Information Officer located in New Orleans, Louisiana, who service the Department of Agriculture, National Finance Center/Client Experience Center/Digital Infrastructure Services Center, including full-time and intermittent employees, and employees serving under either career,

certification has not been clarified to exclude the OCIO employees at this time. My decision does not address whether OCIO is excluded from coverage of the Statute or whether OCIO employees are entitled to rights under the Statute. I have included OCIO in the heading of this decision because OCIO employees are included in the bargaining unit at issue.

career conditions, or accepted appointments.

Excluded: All professional employees, management officials, supervisors, employees serving under temporary appointments for less than 90 days, stay-in-school employees and summer aides, and employees described in 5 U.S.C. 7112(b)(2), (3), (4), (6) and (7).

On July 8, 2025, the Union notified dues-paying members, by email, of special meetings to be held on July 10, 2025. In the email, the Union stated:

AFGE Local 2341 will be Hosting 2 Special Meetings for all of Our Members to have an Opportunity Discuss [sic] and Vote by Secret Ballot Relative to a Potential Change in Our National Union Affiliation from AFGE to NTEU. For you [sic] information a Change in National Union Affiliation should not change anything about Our Local Union as we hold our own Certification Locally.

On July 9, the Union sent an e-mail reminding member of the meetings, adding a third meeting, and repeating the same language as the original notice.

Approximately 15% of the Union's members attended the three meetings. The meeting minutes did not contain the same language about the Union holding its own certification locally, but they did indicate that the change would be in the "Union's National Affiliation from . . . AFGE to . . . NTEU." The minutes also stated, "During the discussion period with the Members President Johns answered questions to explain that a Change in National Affiliation would mean a Change in Our Local's Name." The Union asserts that it told members, during the meetings, that the certification would be held by NTEU, not by the Union at the local level. However, there is no reference to such a statement in any of the meeting minutes. The ballot used in the meetings to vote on the change in affiliation described the choice as follows:

- YES Change National Union Affiliation from AFGE to NTEU
- NO, Don't Change National Affiliation from AFGE to NTEU

The members voted in favor of the change in affiliation to NTEU.

III. Analysis and Conclusions

In *Fla. Nat'l Guard, St. Augustine, Fla.*, 25 FLRA 728 (1987) (*Fla. National Guard*), the Authority specifically adopted the procedural requirements set forth in *Veterans Admin. Hospital, Montrose N.Y.*, 4 A/SLMR 858 (1974) (*Montrose*) to ensure that a union's change in affiliation conforms to the desires of the membership and that no question concerning representation exists. In cases of that nature, *Montrose* requires that the following procedures be met:

- (1) a proposed change in affiliation should be the subject of a special meeting of the members of the incumbent labor organization, called for this purpose only, with adequate advance notice provided to the entire membership;
- (2) the meeting should take place at a time and place convenient to all members;
- (3) adequate time for discussion of the proposed change should be provided, with all members given an opportunity to raise questions within the bounds of normal parliamentary procedure; and
- (4) a vote by the members of the incumbent labor organization on the question should be taken by secret ballot, with the ballot clearly stating the change proposed and the choices inherent therein.

The Authority has consistently employed this process when a proposed amendment of an existing certification is based upon a change in affiliation. *See, e.g., Dep't of the Interior, Bureau of Indian Affairs, Navajo Area, Gallup, N.M.*, 34 FLRA 428 (1990).

In *Union of Fed. Employees*, 41 FLRA 562 (1991), the Authority addressed the adequacy of notice requirement. In that case, the local union's notice stated that the special meeting was to discuss and vote on whether or not to dissolve the local union's affiliation with NFFE so the local could operate as an independent labor organization. However, the notice did not address the additional intention to transform the local union into another labor organization, the Union of Federal Employees (UFE). *Id.* at 567, 583. Because the notice and ballot did not mention UFE, the Authority determined "that the content of the notice of the special meeting, as well as the ballot itself, failed clearly and adequately to inform employees regarding the nature of the proposed change in affiliation." *Id.* at 583. The Authority further found that the notice was so misleading that it "compromised the ability of the . . . members . . . to decide whether to attend the special meeting." *Id.* at 576.

The facts of this case closely parallel those of *Union of Fed. Employees*. The July 8 and 9 notices and July 10 ballot described the change as merely a change in “national affiliation”. Moreover, and even more problematic, the July 8 and 9 notices contain misleading language, “For you [sic] information a Change in National Union Affiliation should not change anything about Our Local Union as we hold our own Certification Locally.” These statements give the false assurance to members that the Union would continue to hold its certification locally even if the vote was to change affiliation to NTEU. This, however, is not the case. Instead NTEU would hold the certification at the national level.² Thus, when Union members voted on July 10, they were not “fully and adequately” informed of the effect of their vote. The Union asserts that it made the choice clear in the meetings, but this is not reflected in the meeting minutes so it is also possible that this was fully understood by attendees. Assuming, however, that the Union clarified the purpose of the vote during the meetings, members that did not attend the meeting would not be aware of this clarification and were thus deprived of the opportunity to attend this meeting if the loss of certification was a concern. Therefore, this, or any clarification of this nature, made at the meetings is insufficient to resolve the insufficiency of the notices that were sent to employees. Because the purpose of the meeting was not made clear in the notices, members could not make an informed decision as to whether to attend one of the meetings.

IV. Order

Because the notice and ballot did not sufficiently inform the members as to the issue to be decided, including the “specific ‘before’ and ‘after’ identities of the exclusive representative,” *Union of Fed. Employees*, 41 FLRA at 575, the petition is dismissed.

V. Right to Seek Review

Under section 7105(f) of the Statute and section 2422.31(a) of the Authority’s Regulations, a party may file an application for review with the Authority within sixty days of this Decision. The application for review must be filed with the Authority by **October 20, 2025** and addressed to the Chief, Office of Case Intake and Publication, Federal Labor Relations Authority, Docket Room, Suite 300, 1400 K Street, NW,

Washington, DC 20424–0001. The parties are encouraged to file an application for review electronically through the Authority’s website, www.flra.gov.³

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Dated: August 19, 2025

² The meeting minutes also do not address any resulting ramifications of a change of this nature. For instance, if the certification is held by NTEU, rather than the local Union, members would not be able to conduct a *Montrose* election to change its affiliation in the future. *U.S. Dep’t of Def., Nat’l Guard Bureau, Div. of Military and Naval Affairs, Latham, N.Y.*, 46 FLRA 1468 (1993) (holding that a local union could not file a *Montrose* petition since the certification was held at the national level).

³ To file an application for review electronically, go to the Authority’s website at www.flra.gov, select **eFile** under the **Filing a Case** tab and follow the instructions.