

RETURN DATE: MARCH 17, 2026	:	SUPERIOR COURT
	:	
RYAN BILODEAU AND EARL ORMOND	:	JUDICIAL DISTRICT
	:	
v.	:	OF HARTFORD
	:	
CONNECTICUT STATE PRISON EMPLOYEES	:	AT HARTFORD
LOCAL NUMBER 391 OF THE	:	
AMERICAN FEDERATION OF STATE, COUNTY	:	
AND MUNICIPAL EMPLOYEES,	:	
AFL-CIO and CONGRESS OF	:	FEBRUARY 15, 2026
CONNECTICUT COMMUNITY COLLEGES	:	

COMPLAINT

Plaintiffs Ryan Bilodeau (“Mr. Bilodeau”) and Earl Ormond (“Mr. Ormond”) bring this action for declaratory and injunctive relief against Defendants Connecticut State Prison Employees Local Number 391 of the American Federation of State, County and Municipal Employees, AFL-CIO (“Local 391”) and Congress of Connecticut Community Colleges (“4Cs”).

INTRODUCTION

1. Connecticut General Statutes Section 31-77 (“Section 31-77”) provides that, with certain exceptions that do not apply here, each labor union with 25 or more members that functions in Connecticut must file an annual financial report with the state’s Labor Commissioner and make that report available to its members.

2. Section 31-77 also entitles the members to ask the state to audit their union’s report, in which case the state “shall transmit to any such member and the labor organization which submitted the report the results of any such audit.”

3. Based on information and belief, since Section 31-77 was enacted in 1957, the Defendant labor unions have failed to file these reports with the Labor Commissioner—

thereby denying Plaintiffs their statutorily guaranteed oversight of their chosen labor organizations.

4. And, although Section 31-77 includes an administrative enforcement mechanism for noncompliance—namely, the imposition of a fine—the Labor Commissioner has publicly pronounced that she does not, and will not, use that mechanism.

5. Indeed, based on information and belief, the Labor Commissioner has never imposed the fine on the Defendant labor unions for their failure to comply with the statute.

6. The amount of the fine, in any event, is only \$25 per violation, which makes the administrative enforcement mechanism effectively meaningless to effectuate the statute's purpose.

7. Plaintiffs Mr. Bilodeau and Mr. Ormond are members of Defendants Local 391 and 4Cs, respectively, which are labor unions that Section 31-77 governs.

8. Based on information and belief, Local 391 and 4Cs fall under the criteria of Section 31-77 and yet they have not complied with the statute.

9. Mr. Bilodeau and Mr. Ormond wish to exercise their rights under Section 31-77 to review the annual financial reports that Local 391 and 4Cs are supposed to file with the Labor Commissioner and make available to their members. They also wish to exercise their rights under Section 31-77 to ask the state to audit those reports.

10. Given the lack of any viable administrative remedy for Mr. Bilodeau's and Mr. Ormond's grievance, the Court should declare that Local 391 and 4Cs are in violation of Section 31-77 and order them to comply with the statute.

PARTIES

11. Plaintiff Mr. Bilodeau, an adult individual, is a correction officer who is employed by the Connecticut Department of Correction. He is, and has been, a member of Local 391 since 2015.

12. Plaintiff Mr. Ormond, an adult individual, is a professor and criminal justice program coordinator at CT State Community College-Naugatuck Valley who is employed by the Board of Regents for Higher Education and the State of Connecticut (“Board”). He is, and has been, a member of 4Cs since 2011.

13. Defendant Local 391 is a labor organization and, for purposes of collective bargaining with the Connecticut Department of Correction, the exclusive representative for Mr. Bilodeau and the other correction officers who are members of his bargaining unit. Its principal place of business is located at 55 Main Street, Suite 5500, Enfield, Connecticut 06082.

14. Defendant 4Cs is a labor organization and, for purposes of collective bargaining with the Board, the exclusive representative for Mr. Ormond and the other community college employees who are members of his bargaining unit. Its principal place of business is located at 907 Wethersfield Avenue, Hartford, Connecticut 06114.

BACKGROUND

15. In 1957, Connecticut’s General Assembly enacted Section 31-77 and the Governor signed it into law.

16. Since that time, Section 31-77 has been amended on several occasions.

17. Section 31-77 provides as follows:

As used in this section, “labor organization” means any organization or association or any agency or employee representation committee or plan which exists for the purpose, in whole or part, of dealing with employers concerning grievances, labor disputes, wages, rates of pay, hours of employment or conditions of work, or any federation or council located in this state representing any group of such labor organizations. Except for labor organizations subject to the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (Public Law 86-267), each labor organization functioning in the state and having twenty-five or more members in any calendar or fiscal year shall, annually, within three months after the end of the calendar or fiscal year used as the basis for such report, file with the Labor Commissioner and make available to its membership a written report either in the form required by Public Law 86-267 or the Internal Revenue Code. Such report shall be filed and transmitted by the treasurer or other chief financial officer of such labor organization and shall be verified by the oath of the treasurer or other chief financial officer filing such report and copies of such report shall be furnished to individual members at the regular or special meeting of the labor organization at which such report is presented and shall be available during the year following the year covered by the report at the labor organization’s office during regular business hours and upon request of any member. Reports under the provisions of this section shall not be open to public inspection except that any person may examine the report of any labor organization of which he is a member, and except that the state may audit any such report so filed at the written request of any member and shall transmit to any such member and the labor organization which submitted the report the results of any such audit. The treasurer or other chief financial officer of any labor organization or any other individual charged with the filing of such reports who fails to comply with the provisions of this section shall forfeit to the state twenty-five dollars for each such failure. The Labor Commissioner may destroy any report filed under the provisions of this section after such report has been on file two years.

18. Section 31-77 therefore applies to “labor organizations” (*i.e.*, labor unions) with 25 or more members that function in Connecticut and, with certain exceptions, requires each of them to file an annual financial report with the state’s Labor Commissioner and make that report available to its members. The report must be “either in the form required by Public Law 86-267 or the Internal Revenue Code.”

19. Under Section 31-77, copies of each report “shall be furnished to individual members at the regular or special meeting of the labor organization at which such report is presented and shall be available during the year following the year covered by the report at the labor organization’s office during regular business hours and upon request of any member.”

20. Section 31-77 also entitles a member to make a written request for the state to audit any of the filed financial reports in question, in which case the state “shall transmit to any such member and the labor organization which submitted the report the results of any such audit.”

21. If a labor organization that is governed by Section 31-77 fails to comply with the statute, it “shall forfeit to the state twenty-five dollars for each such failure.”

22. Based upon information and belief, during the time of Plaintiffs’ affiliation with their respective labor organizations, Defendants have not complied with the statute.

23. On August 8, 2025, in response to an inquiry regarding the status of the audits that are referenced in the statute, the Connecticut Labor Commission sent a letter to two Connecticut senators, publicly pronouncing that she does not, and will not, enforce Section 31-77.

24. In the letter, the Labor Commissioner stated that Section 31-77 “has no consequences for noncompliance” and that “the fine for unions who don’t submit a report is \$25; it costs more in staff time to go after unions who fail to report than the fine covers.” A copy of the letter is attached to this complaint as Exhibit A.

**COUNT I: VIOLATION OF SECTION 31-77
(Mr. Bilodeau v. Local 391)**

25. The preceding paragraphs are incorporated by reference.

26. Local 391 is an organization that exists for the purpose, at least in part, of dealing with employers concerning: employee grievances, labor disputes, wages, rates of pay, hours of employment, and/or conditions of work.

27. Local 391 is not subject to the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (Public Law 86-267).

28. Local 391 functions in Connecticut and has twenty-five or more members.

29. For the above reasons, Section 31-77 governs Local 391.

30. Based on information and belief, Local 391 has not complied with the statute. Specifically, based on information and belief, it has not filed with the Labor Commissioner any of the annual financial reports that the statute requires it to file or made those reports available to its members in accordance with the statute’s requirements.

31. For example, in connection with the most recently-completed calendar and fiscal years, Local 391 did not file the report at issue with the Labor Commissioner or make the report available to its members in accordance with the statute’s requirements.

32. Based on information and belief, in connection with the next-ensuing calendar and fiscal years, Local 391 likewise does not intend to comply with Section 31-77.

33. Based on information and belief, Local 391 is out of compliance with Section 31-77 and intends to remain out of compliance with the statute indefinitely.

34. Although Section 31-77 includes an administrative enforcement mechanism for noncompliance—namely, the imposition of a fine—the Labor Commissioner has publicly pronounced that she does not, and will not, use that mechanism. *See* Ex. A.

35. The amount of the fine, in any event, is only \$25 per violation, which makes the administrative enforcement mechanism effectively meaningless to effectuate the statute’s purpose. As the Labor Commissioner stated, “the fine for unions who don’t submit a report is \$25; it costs more in staff time to go after unions who fail to report than the fine covers.” *See* Ex. A.

36. In violating Section 31-77, Local 391 has deprived Mr. Bilodeau of his right to review the annual financial reports that it is supposed to file with the Labor Commissioner and make available to its members in accordance with the statute’s requirements. It has also deprived Mr. Bilodeau of his right to ask the state to audit those reports.

37. These deprivations of rights amount to *per se* irreparable harm.

38. If the Court refused to order Local 391 to comply with Section 31-77, the harm to Mr. Bilodeau would continue to take place.

39. If the Court issued the order, by contrast, Local 391 would not be harmed by fulfilling its duty to comply with the statute.

40. If the Court ordered Local 391 to comply with Section 31-77, it would abate the offending activity by preventing the non-compliance from continuing to injure Mr. Bilodeau, as well as the union’s other members.

41. If the Court issued the order, it would not adversely affect the public interest, because the public does not have an interest in Local 391 continuing to violate Section 31-77. The public, on the other hand, has an interest in giving effect to Section 31-77 and the rights that it confers on union members like Mr. Bilodeau.

42. The administrative remedy that Section 31-77 provides for the protection of the rights it grants is effectively non-existent and illusory.

**COUNT II: VIOLATION OF SECTION 31-77
(Mr. Ormond v. 4Cs)**

43. Paragraphs 1 through 24 are incorporated by reference.

44. 4Cs is an organization that exists for the purpose, at least in part, of dealing with employers concerning: employee grievances, labor disputes, wages, rates of pay, hours of employment, or conditions of work.

45. 4Cs is not subject to the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (Public Law 86-267).

46. 4Cs functions in Connecticut and has twenty-five or more members.

47. For the above reasons, Section 31-77 governs 4Cs.

48. Based on information and belief, 4Cs has not complied with the statute. Specifically, based on information and belief, it has not filed with the Labor Commissioner any of the annual financial reports that the statute requires it to file or made those reports available to its members in accordance with the statute's requirements.

49. For example, in connection with the most recently-completed calendar and fiscal years, 4Cs did not file the report at issue with the Labor Commissioner or make the report available to its members in accordance with the statute's requirements.

50. Based on information and belief, in connection with the next-ensuing calendar and fiscal years, 4Cs likewise does not intend to comply with Section 31-77.

51. Based on information and belief, 4Cs is out of compliance with Section 31-77 and intends to remain out of compliance with the statute indefinitely.

52. Although Section 31-77 includes an administrative enforcement mechanism for noncompliance—namely, the imposition of a fine—the Labor Commissioner has publicly pronounced that she does not, and will not, use that mechanism. *See* Ex. A.

53. The amount of the fine, in any event, is only \$25 per violation, which makes the administrative enforcement mechanism effectively meaningless to effectuate the statute’s purpose. As the Labor Commissioner stated, “the fine for unions who don’t submit a report is \$25; it costs more in staff time to go after unions who fail to report than the fine covers.” *See* Ex. A.

54. In violating Section 31-77, 4Cs has deprived Mr. Ormond of his right to review the annual financial reports that it is supposed to file with the Labor Commissioner and make available to its members in accordance with the statute’s requirements. It has also deprived Mr. Ormond of his right to ask the state to audit those reports.

55. These deprivations of rights amount to *per se* irreparable harm.

56. If the Court refused to order 4Cs to comply with Section 31-77, the harm to Mr. Ormond would continue to take place.

57. If the Court issued the order, by contrast, 4Cs would not be harmed by fulfilling its duty to comply with the statute.

58. If the Court ordered 4Cs to comply with Section 31-77, it would abate the offending activity by preventing the non-compliance from continuing to injure Mr. Ormond, as well as the union's other members.

59. If the Court issued the order, it would not adversely affect the public interest, because the public does not have an interest in 4Cs continuing to violate Section 31-77. The public, on the other hand, has an interest in giving effect to Section 31-77 and the rights that it confers on union members like Mr. Ormond.

60. The administrative remedy that Section 31-77 provides for the protection of the rights that it grants is effectively non-existent and illusory.

PRAYER FOR RELIEF

WHEREFORE, Mr. Bilodeau and Mr. Ormond respectfully request that this Court:

- (a) Declare that Local 391 and 4Cs are each in violation of Section 31-77;
- (b) Issue an injunction order that, for the most recently-completed calendar or fiscal year and all ensuing calendar or fiscal years, requires Local 391 and 4Cs to each cease and desist their failure to comply with Section 31-77 by filing with the Labor Commissioner the annual financial report that the statute requires it to file, and make the report available to its members in accordance with the statute's requirements; and
- (c) Grant such other relief as is just and proper.

Respectfully submitted,

//s// Craig C. Fishbein, Esq. 420267

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Counsel for Plaintiffs

Exhibit A



Rob.Sampson@cga.ct.gov

Stephen.Harding@cga.ct.gov

August 8, 2025

Dear Senators Sampson and Harding,

Thank you for your letter offering to assist with Sec. 31-77 Annual reports. We attempted to fix this last session in the technical bill and would greatly appreciate your support next session. Repealing this statute is part of our effort to save taxpayer dollars and clean up outdated and obsolete statutes.

In short, this statute is redundant, fails to offer fiscal oversight, and has no consequences for noncompliance. It requires CTDOL to receive union financial reports—information that is already publicly available in the IRS form 990. To comply, CTDOL would spend staff time receiving the reports and archiving them for two years, then filing papers to have them destroyed in accordance with the statute and state records retention laws. Additionally, the fine for unions who don't submit a report is \$25; it costs more in staff time to go after unions who fail to report than the fine covers. It's worth noting too that the reports are not disclosable to the general public, whereas the IRS 990 forms are.

Interestingly, there has not been any inquiry for these documents as far as anyone at CTDOL can remember—with the exception of the 2021 request from Mr. Frank Ricci, the Yankee Institute Labor Fellow. As I noted above, the provisions of the statute prohibit releasing documents to him in any case.

Thank you for your inquiry. As always, I'm happy to answer any further questions and hope to set up a meeting with you in a few months to discuss the repeal.

Sincerely,

A handwritten signature in black ink that reads "Nanti Bartolomeo". The signature is written in a cursive style.

Danté Bartolomeo
Commissioner
Dante.Bartolomeo@ct.gov

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