

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Marty W. Crandall v. Teamsters Local No. 150 and Dale Wentz

Crandall v. Teamsters Local No. 150 · No. 2:23-cv-03043-KJM-CSK · Decided June 24, 2025

SUMMARY

The United States District Court for the Eastern District of California granted defendants’ motion for judgment on the pleadings in Marty W. Crandall’s action against Teamsters Local No. 150 and Dale Wentz. The court held that Crandall’s remaining claims under sections 101(a)(1) and (2) of the Labor-Management Reporting and Disclosure Act failed because his allegations concerned exclusion from a candidate slate and the resulting election effects, rather than denial of protected union-member rights or actionable retaliation. The court also concluded that challenges to election procedures were preempted by Title IV of the LMRDA and directed the Clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 24, 2025
DOCKET	2:23-cv-03043-KJM-CSK
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c) on the plaintiff’s remaining claims under sections 101(a)(1) and 101(a)(2) of the Labor Management Reporting and Disclosure Act. The court granted the motion and closed the case.
STANDARD OF REVIEW	A Rule 12(c) motion is functionally identical to a Rule 12(b)(6) motion when, as here, the motion challenges failure to state a claim. The court accepts factual allegations as true and asks whether they plausibly support an inference of liability.
PRECEDENTIAL VALUE	nonprecedential district court order
PARTIES	Marty W. Crandall v. Teamsters Local No. 150, Dale Wentz

TOPICS

- motion for judgment on the pleadings
- labor law
- election law
- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

labor law

civil procedure

election law

QUESTIONS PRESENTED

1. Whether the court had subject matter jurisdiction over Crandall's claims to the extent they challenged his exclusion from a union election slate and the resulting effects on the election.
2. Whether exclusion from a union candidate slate, without an allegation of discriminatory deprivation of a right accorded to other members, states a claim under LMRDA section 101(a)(1).
3. Whether exclusion from a union candidate slate states a retaliatory-action claim under LMRDA section 101(a)(2).
4. Whether Crandall's allegations plausibly showed that defendants denied him a Title I right or took retaliatory action directly because he expressed disagreement with union leadership.

HOLDINGS

1. LMRDA Title IV preempts claims that challenge union election procedures or seek relief that would interfere with or overturn the results of an election. Title I jurisdiction remains available only for discriminatory conduct affecting Title I rights when the requested remedy does not challenge the election itself.
2. A plaintiff does not state a section 101(a)(1) claim merely by alleging exclusion from a union candidate slate or deprivation of the opportunity to be elected to a particular union office. The claim requires an allegation that the plaintiff was denied a right accorded to other union members.
3. A section 101(a)(2) retaliation claim requires allegations that the plaintiff exercised the right to oppose union policies, was subjected to retaliatory action, and suffered that action as a direct result of expressing disagreement with union leadership. Crandall's alleged exclusion from a candidate slate did not satisfy that standard.

KEY QUOTATIONS

“For these reasons, Crandall does not state a claim under subsection 101(a)(1) or (2).” (at 9)

“The motion for judgment on the pleadings (ECF No. 25) is granted. The Clerk’s office is instructed to close the case.” (at 10)

FACTUAL BACKGROUND

Crandall was an elected business agent for Teamsters Local No. 150. About one month before a union election, principal officer Dale Wentz removed Crandall from the slate of candidates running together for reelection, allegedly to protect another business agent whom Crandall had accused of misconduct. Crandall believed the late removal made an independent campaign effectively futile and chose not to run. He characterized the removal as retaliation and as a violation of his rights under LMRDA sections 101(a)(1) and 101(a)(2).

PROCEDURAL HISTORY

Crandall filed suit in December 2023 alleging that the union and its principal officer unlawfully removed him from an election slate in retaliation for complaints about alleged misconduct. The court previously dismissed or partially dismissed his LMRDA section 609, age-discrimination, whistleblower-retaliation, and wrongful-termination claims, leaving only claims under LMRDA section 101(a)(1) and (a)(2). On defendants' Rule 12(c) motion, the court concluded that the remaining allegations either challenged union election procedures preempted by LMRDA Title IV or failed to state a Title I claim, granted judgment on the pleadings, and directed the Clerk to close the case.

DISPOSITION

other

CASES CITED

- Local No. 82, Furniture & Piano Moving, Furniture Store Drivers, Helpers, Warehousemen & Packers v. Crowley, 467 U.S. 526 (1984)
- Casumpang v. International Longshoremen's & Warehousemen's Union, Local 142, 269 F.3d 1042 (9th Cir. 2001)
- Kupau v. Yamamoto, 622 F.2d 449 (9th Cir. 1980)
- Davis v. Turner, 395 F.2d 671 (9th Cir. 1968)
- Schonfeld v. Penza, 477 F.2d 899 (2d Cir. 1973)
- Reich v. Local 396, International Brotherhood of Teamsters, Chauffeurs, Warehousemen & Helpers of America, AFL-CIO, 97 F.3d 1269 (9th Cir. 1996)
- Bradley v. American Postal Workers Union, AFL-CIO, 962 F.2d 800 (8th Cir. 1992)
- Ackley v. Western Conference of Teamsters, 958 F.2d 1463 (9th Cir. 1992)
- Sheet Metal Workers' International Association v. Lynn, 488 U.S. 347 (1989)
- Salzhandler v. Caputo, 316 F.2d 445 (2d Cir. 1963)
- Finnegan v. Leu, 456 U.S. 431 (1982)
- Bunz v. Moving Picture Machine Operators' Protective Union Local 224, 567 F.2d 1117 (D.C. Cir. 1977)
- McGinnis v. Local Union 710, International Brotherhood of Teamsters, 774 F.2d 196 (7th Cir. 1985)
- Trbovich v. United Mine Workers of America, 404 U.S. 528 (1972)
- Gregg v. Hawaii, Department of Public Safety, 870 F.3d 883 (9th Cir. 2017)
- Cafasso v. General Dynamics C4 Systems, Inc., 637 F.3d 1047 (9th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- Ray v. Henderson, 217 F.3d 1234 (9th Cir. 2000)