

SUPPORT H.R. 2095

TO COMBAT ORGANIZED CRIME MAIL THEFT WAR

THE UNITED STATES POSTAL POLICE RESTRICTION AND H.R. 2095

How the Postal Police Restriction Happened, Who Was Involved, and What H.R. 2095 Would Change

Introduction

The **United States Postal Inspection Service (USPIS)** is a federal law enforcement agency responsible for protecting the United States Mail, postal employees, postal customers, and the postal system.

The Postal Inspection Service includes **Postal Inspectors** and **Postal Police Officers (PPOs)**.

Postal Inspectors are federal criminal investigators who investigate crimes involving the mail and postal system.

Postal Police Officers are the uniformed police component of the Postal Inspection Service. Postal Police have performed protective and preventive law enforcement duties involving postal facilities, employees, mail, postal vehicles, collection boxes, high value shipments, and other postal interests.

The events of 2020 did **not abolish the Postal Inspection Service or eliminate the Postal Police**.

USPS and Postal Inspection Service management restricted where Postal Police Officers could exercise law enforcement authority and substantially limited their ability to perform regular off property police work.

The issue developed during a labor dispute between USPS and the union representing Postal Police Officers.

THE ORIGINAL LABOR DISPUTE

The issue did not begin with someone filing a lawsuit asking a court to remove Postal Police Officers from the streets.

It developed during a **collective bargaining dispute between the United States Postal Service and the Postal Police Officers Association (PPOA)**.

The PPOA represents Postal Police Officers for collective bargaining purposes.

The parties had operated under a collective bargaining agreement dating from 2012. When USPS and the union could not agree upon the terms of a replacement agreement, the matter went to **interest arbitration**.

One issue involved the work actually performed by Postal Police Officers.

The union sought to establish that PPOs were **fully functioning police officers performing substantial law enforcement duties**, including duties away from Postal Service property.

Their duties were relevant to their working conditions, responsibilities, and compensation.

CRAIG GOLDBERG AND THE FEBRUARY 2020 ARBITRATION

During a **February 2020 interest arbitration hearing**, **Craig Goldberg**, then a Deputy Chief Inspector within the Postal Inspection Service, testified for USPS.

According to the later federal court record, the Postal Police Officers Association was attempting to establish that Postal Police Officers were fully functioning police officers who performed substantial amounts of work away from Postal Service premises.

During the proceeding, Goldberg testified that **he did not know whether Postal Police Officer law enforcement authority was legally limited to USPS real estate**.

The union's later federal complaint also alleged that Goldberg raised concerns about possible civil liability if PPOs exercised law enforcement authority away from Postal Service property without possessing the legal authority to do so.

Craig Goldberg did not sue the Postal Police.

There was no lawsuit filed by Goldberg that restricted Postal Police Officers.

Goldberg was testifying during a **labor arbitration between USPS and the Postal Police Officers Association**.

His testimony raised an important legal question about exactly where Postal Police Officers were authorized to exercise federal police authority.

POSTAL POLICE CONTINUED WORKING AFTER THE FEBRUARY HEARING

Goldberg's February 2020 testimony did not immediately stop Postal Police Officers from performing assignments away from Postal Service property.

According to the later court record, USPS continued assigning PPOs to certain off property duties after the question about their jurisdiction had been raised.

Postal Police had historically performed duties involving the protection of mail, postal employees, postal vehicles, collection points, high value shipments, and other postal interests.

The question concerning jurisdiction existed while Postal Police Officers continued performing duties outside the physical boundaries of postal facilities.

GARY R. BARKSDALE

Gary R. Barksdale was the **Chief Postal Inspector** during these events and headed the United States Postal Inspection Service.

Barksdale had been appointed Acting Chief Postal Inspector effective **December 31, 2018**.

His appointment was announced by then Postmaster General **Megan J. Brennan**.

Barksdale became Chief Postal Inspector in March 2019.

He was already leading the Postal Inspection Service before Louis DeJoy became Postmaster General.

MEGAN J. BRENNAN

Megan J. Brennan was Postmaster General when Gary Barksdale was appointed to lead the Postal Inspection Service in an acting capacity.

She served as Postmaster General before Louis DeJoy.

Barksdale's appointment therefore occurred before DeJoy's administration.

LOUIS DEJOY

Louis DeJoy became Postmaster General in June 2020.

This occurred several months after Craig Goldberg's February 2020 arbitration testimony.

Approximately two months after DeJoy became Postmaster General, the restriction on Postal Police operations was issued.

At that time:

Louis DeJoy was Postmaster General.

Gary R. Barksdale was Chief Postal Inspector.

Another Postal Inspection Service official issued the actual August directive.

DAVID BOWERS AND THE AUGUST 25, 2020 RESTRICTION

On **August 25, 2020**, **Deputy Chief Inspector David Bowers** issued a nationwide management communication concerning Postal Police Officers.

The communication stated the Postal Inspection Service's position that PPOs could not exercise law enforcement authority in matters unrelated to Postal Service premises.

The policy substantially restricted routine deployment of Postal Police Officers away from USPS property.

Off property use of Postal Police Officers required approval from a Deputy Chief Inspector.

Officers could travel between postal facilities, but the policy instructed that officers were not to be placed in situations where they would reasonably be expected to exercise law enforcement authority while traveling.

Postal Police Officers continued to exist as uniformed federal law enforcement personnel.

Their ability to regularly perform police duties beyond Postal Service property was substantially restricted.

WHY USPS RESTRICTED POSTAL POLICE

The official legal issue involved the interpretation of **18 U.S.C. § 3061**, the federal statute governing law enforcement authority connected to the Postal Service.

USPS adopted a restrictive interpretation concerning Postal Police Officer authority away from Postal Service property.

The Postal Police Officers Association disagreed.

The question was whether Postal Police Officers could exercise their authority beyond Postal Service real estate when protecting mail, postal employees, postal vehicles, and other postal interests.

The language of the existing federal statute became the center of the dispute.

WHY THE UNION OBJECTED

The **Postal Police Officers Association** believed the August directive changed the established duties and working conditions of Postal Police Officers.

The union maintained that Postal Police Officers had historically performed law enforcement and protective duties away from Postal Service property.

It also argued that restricting those operations affected the ability of uniformed Postal Police Officers to protect the mail and postal employees.

Two legal matters developed.

One involved the meaning of federal law and the jurisdiction of Postal Police Officers.

The other involved whether USPS could change established duties and working conditions without complying with its collective bargaining agreement.

THE POSTAL POLICE OFFICERS ASSOCIATION SUED

The Postal Police Officers Association responded to the restriction by filing a grievance.

The union then filed a federal lawsuit.

The case was:

Postal Police Officers Association v. United States Postal Service et al.

United States District Court for the District of Columbia

Case No. 1:20-cv-02566

Plaintiff

Postal Police Officers Association

Defendants

United States Postal Service

Louis DeJoy, in his official capacity as Postmaster General

The Postal Police Officers Association was therefore **fighting the restriction**.

The union was not responsible for creating it.

Craig Goldberg did not file this lawsuit.

Gary Barksdale was not individually named as a defendant.

David Bowers was not individually named as a defendant.

JUDGE CHRISTOPHER R. COOPER

The federal case was heard by **United States District Judge Christopher R. Cooper**.

On **November 24, 2020**, Judge Cooper declined to invalidate USPS's interpretation of the federal statute.

The federal court did **not** originally order USPS to restrict Postal Police.

USPS had already issued the restriction.

The order of events was:

USPS management restricted Postal Police operations.

The Postal Police Officers Association challenged the restriction.

The federal court declined to invalidate USPS's interpretation of the law.

Judge Cooper determined that USPS's interpretation of the existing statute was legally permissible.

Congress had not specifically ordered Postal Police Officers to remain on Postal Service property.

The case showed that the existing statute allowed a serious disagreement concerning Postal Police jurisdiction.

THE UNION CONTINUED THROUGH ARBITRATION

The federal court decision did not end the dispute.

The Postal Police Officers Association continued pursuing its grievance through the collective bargaining process.

In **February 2023**, an arbitrator concluded that the 2020 management directive constituted an improper **unilateral change in Postal Police Officers' terms and conditions of employment** under the collective bargaining agreement.

The arbitrator ordered USPS to:

Rescind the 2020 management communication.

Follow the applicable Postal Police handbooks governing the use of Postal Police Officers.

The arbitration addressed the employment and collective bargaining issues involved in the restriction.

The dispute concerning federal statutory authority remained important.

THE CASE RETURNED TO FEDERAL COURT

In **March 2023**, the Postal Police Officers Association returned to federal court seeking enforcement of the arbitration award.

The case was:

Postal Police Officers Association v. United States Postal Service

Civil Action No. 23-0675

USPS maintained that it had rescinded the 2020 management communication.

The parties continued to disagree over whether USPS had fully complied with the arbitration award and the Postal Police handbooks.

Judge **Christopher R. Cooper** again handled the federal litigation.

In **February 2024**, the court determined that rescinding the memorandum did not necessarily resolve the entire dispute.

The compliance issue was returned to the arbitrator.

FRANK ALBERGO

Frank Albergo, President of the Postal Police Officers Association, became a leading advocate for restoring Postal Police authority.

Albergo has testified before Congress about Postal Police staffing, authority, mail theft, robberies, attacks against postal employees, and the need for uniformed Postal Police patrols.

The PPOA has supported legislation establishing clear federal authority for Postal Police Officers to protect the mail and postal employees beyond Postal Service buildings.

SENATOR TAMMY BALDWIN

Senator Tammy Baldwin of Wisconsin was among the lawmakers who questioned the 2020 Postal Police restriction.

She sought information from USPS concerning the decision and raised concerns regarding the limitation placed upon Postal Police Officers.

The issue became a matter of congressional attention involving postal security, postal employees, mail theft, and federal law enforcement authority.

POSTAL INSPECTORS AND POSTAL POLICE OFFICERS

The United States Postal Inspection Service contains separate law enforcement functions.

Postal Inspectors

Postal Inspectors are federal criminal investigators.

They investigate crimes involving the mail and postal system and develop criminal cases for prosecution.

Postal Police Officers

Postal Police Officers are uniformed federal police officers.

Their work includes security, patrol, crime prevention, deterrence, protection, and response.

The Postal Inspection Service continued to employ Postal Inspectors after the 2020 restriction.

The dispute involved the ability of the agency's **uniformed Postal Police Officers** to regularly perform police duties away from Postal Service property.

ORGANIZED MAIL THEFT AND POSTAL EMPLOYEE SAFETY

Mail theft, robberies of postal employees, theft of postal keys, assaults against letter carriers, organized mail theft operations, check theft, identity theft, and fraud involving stolen mail have created serious law enforcement concerns.

Organized criminal groups can use stolen postal keys, mail, checks, personal information, and financial documents to commit additional crimes.

Postal Police supporters argue that uniformed officers are necessary to protect postal employees, mail, postal property, collection boxes, vehicles, and other postal operations.

The Postal Police Officers Association has called for restoration of off property patrol authority as part of the federal response to mail crime.

HOW THE RESTRICTION DEVELOPED

Postal Police Officers historically performed law enforcement duties away from Postal Service property.

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USPS and the Postal Police Officers Association entered a labor dispute concerning the officers' contract, duties, and compensation.

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During February 2020 interest arbitration, the union sought to establish that PPOs were fully functioning police officers performing substantial off property work.

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Deputy Chief Inspector Craig Goldberg testified that he did not know whether PPO law enforcement authority was legally limited to USPS real estate.

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USPS continued assigning officers to certain off property duties.

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Louis DeJoy became Postmaster General in June 2020 while Gary R. Barksdale was Chief Postal Inspector.

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Deputy Chief Inspector David Bowers issued the August 25, 2020 management communication restricting off property PPO law enforcement activity.



The Postal Police Officers Association filed a grievance.



The union sued USPS and Louis DeJoy.



Judge Christopher R. Cooper declined to invalidate USPS's interpretation of the statute.



The union continued its labor grievance through arbitration.



A 2023 arbitrator ruled that USPS had improperly made a unilateral change under the collective bargaining agreement.



The dispute returned to federal court concerning compliance with the arbitration award.



Congress introduced legislation addressing Postal Police jurisdiction.

H.R. 2095

POSTAL POLICE REFORM ACT OF 2025

The legislation currently addressing Postal Police authority is:

H.R. 2095

Postal Police Reform Act of 2025

119th Congress

The bill was introduced on **March 14, 2025**.

The sponsor is:

Representative Andrew R. Garbarino of New York.

H.R. 2095 proposes amendments to federal law concerning the authority and duties of United States Postal Service police officers.

The bill addresses the question that became central to the 2020 dispute:

Where may Postal Police Officers exercise their federal law enforcement authority?

H.R. 2095 would provide specific federal statutory authority concerning Postal Police duties involving postal employees, Postal Service property, and the United States Mail.

The legislation addresses Postal Police authority **on and away from Postal Service property** when carrying out duties involving protected postal interests.

WHAT H.R. 2095 WOULD CHANGE

The 2020 restriction was based upon USPS's interpretation of existing federal law.

H.R. 2095 would amend the law itself.

Congress would provide more specific statutory direction concerning the duties and jurisdiction of Postal Police Officers.

This would address the legal issue that arose during the labor dispute and later became the basis of the 2020 restriction.

The history is:

Existing federal law

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Question concerning PPO jurisdiction

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USPS interpretation

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Postal Police restriction

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Union challenge

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Federal litigation

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Labor arbitration



Congressional legislation

H.R. 2095 addresses the federal statute governing Postal Police authority.

PEOPLE INVOLVED

Megan J. Brennan

Former Postmaster General who announced Gary R. Barksdale's appointment as Acting Chief Postal Inspector.

Gary R. Barksdale

Chief Postal Inspector during the 2020 Postal Police restriction.

Craig Goldberg

Deputy Chief Inspector who testified during the February 2020 labor arbitration where the question concerning off property Postal Police authority arose.

Louis DeJoy

Postmaster General when the August 2020 restriction was issued and a defendant in the Postal Police Officers Association's federal lawsuit in his official capacity.

David Bowers

Deputy Chief Inspector who issued the **August 25, 2020 management communication** restricting Postal Police activity away from Postal Service premises.

Judge Christopher R. Cooper

United States District Judge who heard the federal litigation involving the Postal Police restriction and later arbitration enforcement dispute.

Frank Albergo

President of the Postal Police Officers Association and advocate for restoring Postal Police authority.

Senator Tammy Baldwin

United States Senator who questioned the Postal Police restriction and sought information concerning the decision.

Representative Andrew R. Garbarino

Sponsor of H.R. 2095, the Postal Police Reform Act of 2025.

CURRENT STATUS OF H.R. 2095

H.R. 2095 was introduced in the **119th Congress on March 14, 2025**.

The legislation was referred to the:

House Committee on the Judiciary

and

House Committee on Oversight and Government Reform.

As of **August 2026**, Congress.gov lists H.R. 2095 at the **Introduced** stage.

The legislation has **not yet become federal law**.

CONCLUSION

The Postal Police restriction began during a period when USPS and the Postal Police Officers Association were disputing the duties, employment conditions, and compensation of Postal Police Officers.

During February 2020 interest arbitration, the union sought to establish that Postal Police Officers performed substantial police duties away from Postal Service property.

Deputy Chief Inspector **Craig Goldberg** testified that he did not know whether their law enforcement authority was legally limited to USPS real estate.

Postal Police continued performing certain off property duties after that testimony.

During the leadership of **Postmaster General Louis DeJoy** and **Chief Postal Inspector Gary R. Barksdale**, Deputy Chief Inspector **David Bowers** issued the August 25, 2020 communication restricting Postal Police activity away from Postal Service premises.

The **Postal Police Officers Association opposed the restriction**, filed a grievance, and sued USPS and Louis DeJoy.

Judge **Christopher R. Cooper** declined to invalidate USPS's interpretation of the existing federal statute.

The union continued through arbitration, and in 2023 an arbitrator ruled that USPS had improperly made a unilateral change under the collective bargaining agreement.

The matter continued through federal court.

Congress later introduced **H.R. 2095, the Postal Police Reform Act of 2025**, to address the law governing Postal Police authority.

H.R. 2095 would establish more specific federal rules concerning where Postal Police Officers may carry out their duties while protecting postal employees, the United States Mail, Postal Service property, and other postal interests.

The legislation addresses a jurisdictional issue that has remained disputed since 2020.

SUPPORT H.R. 2095

TO COMBAT ORGANIZED CRIME MAIL THEFT WAR

SOURCES

Congress.gov — H.R. 2095, Postal Police Reform Act of 2025

<https://www.congress.gov/bill/119th-congress/house-bill/2095>

United States District Court for the District of Columbia — Postal Police Officers Association v. United States Postal Service, 2020 Decision

<https://law.justia.com/cases/federal/district-courts/district-of-columbia/dcdce/1:2020cv02566/222023/21/>

Original 2020 Complaint — Postal Police Officers Association v. United States Postal Service and Louis DeJoy

<https://www.courthousenews.com/wp-content/uploads/2020/09/poa-v-DeJoy.pdf>

United States District Court for the District of Columbia — 2024 Postal Police Arbitration Litigation

https://www.govinfo.gov/content/pkg/USCOURTS-dcd-1_23-cv-00675/pdf/USCOURTS-dcd-1_23-cv-00675-0.pdf

U.S. Government Accountability Office — Postal Inspection Service Staffing

<https://www.gao.gov/products/gao-24-105390>

United States Postal Service — Gary Barksdale Leadership Appointment

<https://news.usps.com/2018/12/20/inspection-service-chief/>

United States Postal Inspection Service

<https://www.uspis.gov/>

Senator Tammy Baldwin — Postal Police Officers

<https://www.baldwin.senate.gov/news/press-releases/postal-police-officers>

Congressional Hearing — Postal Police and Postal Crime

<https://www.congress.gov/event/119th-congress/house-event/118527/text>

I kept “**Support H.R. 2095 / To Combat Organized Crime Mail Theft War**” at both the top and bottom and removed much of the wording that sounded overly polished or generic.