



October 27, 2022

Brett Wideman, Secretary-Treasurer
Plumbers Northwest District Council
3915 East Main Street
Spokane, WA 99202

Case Number: 530-6025313()
LM Number: 507090

Dear Brett Wideman:

This office has recently completed an audit of Plumbers Northwest District Council under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). As discussed during the exit interview with you and Office Manager [REDACTED] on October 20, 2022, the following problems were disclosed during the CAP. The matters listed below are not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

Recordkeeping Violation

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records for at least five years by which each receipt and disbursement of funds, as well as all account balances, can be verified, explained, and clarified. As a general rule, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers, and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing the additional information. For money it receives, the labor organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of the Plumbers Northwest District Council's 2021 records revealed the following recordkeeping violation:

Lack of Allowance Authorization

The council did not maintain records to verify that the allowance amount reported in Item 24 (All

Officer and Disbursements to Officers) of the LM-3 was the authorized amount and, therefore, was correctly reported. The union must keep a record, such as meeting minutes, to show the current allowance authorized by the entity or individual in the union with the authority to establish salaries.

Based on your assurance that the Plumbers Northwest District Council will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.


Reporting Violation

Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. Plumbers Northwest District Council amended its constitution and bylaws in 2019 but did not file a copy with its LM report for that year. The council has now filed a copy of its constitution and bylaws.

I want to extend my personal appreciation to Plumbers Northwest District Council for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,

A solid black rectangular box redacting the signature of the investigator.

Investigator