



June 13, 2023

Ms. Valda Johnson, President
Independent Union of Pension Employees
2633 Tupelo Court
Woodbridge, VA 22192

Case Number: 450-6025772()
LM Number: 544369

Dear Ms. Johnson:

This office has recently completed an audit of the Independent Union of Pension Employees for Democracy and Justice (IUPEDJ) under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Civil Service Reform Act of 1978 (CSRA), 5 U.S.C. 7120, and the Department's regulations, 29 CFR 458. As discussed during the exit interview with you on June 12, 2023, 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.

Reporting Violations

Pursuant to 29 C.F.R., Section 458.3, the reporting requirement under 29 C.F.R. Section 403.2 (see Section 201(b) of the Labor-Management Reporting and Disclosure Act (LMRDA)) is made applicable to labor organizations subject to the requirements of the CSRA. This provision requires labor organizations to file annual financial reports that accurately disclose their financial condition and operations. The audit disclosed a violation of this requirement. The Labor Organization Annual Report Form LM-3 filed by the IUPEDJ for the fiscal year ended December 31, 2021, was deficient in that:

1. Disbursements to Officers

The IUPEDJ did not report the name of an officer that held the office of vice president at large at the beginning of the audit year in Item 24 (All Officers and Disbursements to Officers). This officer should have been listed in Item 24 with the status of past officer. The union must report in Item 24 all persons who held office during the year, regardless of whether they received any payments from the union or left office during the year.

2. Failure to File Bylaws

Pursuant to 29 C.F.R. Section 458.3, the requirement under 29 C.F.R. Section 402.4 implementing LMRDA Section 201(a) is made applicable to labor organizations subject to the requirements of the CSRA. This provision requires labor organizations to file copies of any revised constitution and bylaws when it files its annual financial report. The audit disclosed a violation of this requirement. The IUPEDJ amended its

constitution and bylaws in 2019 but did not file the required copies with its LM report for that year. As agreed, the IUPEDJ will file a copy of its current constitution and bylaws with OLMS using the OLMS Electronic Filing System (EFS) as soon as possible but not later than June 30, 2023.

I am not requiring that the IUPEDJ file an amended LM report for 2021 to correct the deficient items, but the IUPEDJ has agreed to properly report the deficient items on all future reports it files with OLMS.

Other Issues

Bank Statements

During the audit, you advised that the union's bank statements are mailed to a former IUPEDJ officer who then forwards those documents to you. OLMS strongly recommends that the bank statements be mailed to current officers of the union.

I want to extend my personal appreciation to the IUPEDJ 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,



Investigator