



August 10, 2023

Mr. Mike Trudeau, Treasurer  
International Longshore and Warehouse Union Local 94  
180 E. Ocean Blvd., Ste 1020  
Long Beach, CA 90802

Case Number: 520-6026250( )  
LM Number: 008272

Dear Mr. Trudeau:

This office has recently completed an audit of International Longshore and Warehouse Union Local 94 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 SR Holguin, PC Attorneys Marcos Holguin and Jonathan Jung on August 10, 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.

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 Local 94's 2022 records revealed the following recordkeeping 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 and bylaws. Local 94 amended its constitution and bylaws in 2016, but did not file a copy with its LM report for that year.

Local 94 has now filed a copy of its constitution and bylaws.

I want to extend my personal appreciation to International Longshore and Warehouse Union Local 94 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,



Senior Investigator

cc: Mr. Daniel G. Miranda, President