



October 2, 2023

Mrs. Kathleen Bergman, Treasurer
Auto Workers Local 674
8080 Beckett Center Dr, Suite 119
West Chester, OH 45071

Case Number: 350-6026233()
LM Number: 021-833

Dear Mrs. Bergman:

This office has recently completed an audit of Auto Workers Local 674 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 President Janet Billingsley on September 28, 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.

Recordkeeping Violations

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 674's 2022 records revealed the following recordkeeping violations:

1. Failure to Maintain Disbursement Records

Local 674 did not properly maintain disbursement records for voided checks. The union did not keep the original copy of the voided check on record. For example, the union voided check [REDACTED] for \$156.00 and made the adjustment in the unions books but failed to keep

the original copy of the check. Union disbursements records must include an adequate identification of all money the union pays out. The records should show the date and amount paid, and the source of the money.

2. Failure to Maintain Receipt Records

Local 674 did not properly maintain receipt records for receipts totaling \$18,360.06. For example, fourteen retiree dues receipts did not have dues reports to support the receipts. Union receipts records must include adequate identification of all money the union receives. The records should show the date and amount received, and the source of the money.

Based on your assurance that Local 674 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Reporting Violations


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. Local 674 amended its constitution and bylaws in 2008, but did not file a copy with its LM report for that year.

As agreed, Local 674 will file a copy of its current constitution and bylaws with OLMS as soon as possible but not later than October 12, 2023.

I want to extend my personal appreciation to Auto Workers Local 674 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 large black rectangular redaction box covering the signature of the investigator.

Investigator

cc: Mrs. Janet Billingsley, President