



March 28, 2014

[REDACTED]

[REDACTED]

[REDACTED]

Dear [REDACTED]:

This Statement of Reasons is in response to your complaint received by the U.S. Department of Labor on September 26, 2013, alleging that violations of Title IV of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA), occurred in connection with the delegate election of Local 400, United Food and Commercial Workers Union (UFCW), that concluded on April 25, 2013.

You made several allegations concerning Local 400's delegate election. The Local 400 delegates elected on April 25, 2013 participated in the election of international UFCW officers at the UFCW Convention that was held August 12-13, 2013. The Local 400 election of delegates was covered by Title IV of the LMRDA only because those delegates participated in the election of UFCW International officers. 29 C.F.R. § 452.22. Having served that sole Title IV-related purpose, those delegates have no further functions to perform. Accordingly, even if all of your allegations were substantiated as meritorious, there is no effective remedy available because the functions that brought the delegates within the coverage of the LMRDA have already been performed.

Because there is no remedy that can be provided to correct any local delegate election improprieties, even if substantiated, I have closed the file in this matter.

Sincerely,

Patricia Fox  
Chief, Division of Enforcement

cc: Joseph T. Hansen, International President  
United Food and Commercial Workers Union  
1775 K Street, N.W.  
Washington, DC 20006

Mark Federici, President  
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Christopher Wilkinson, Associate Solicitor  
for Civil Rights and Labor-Management