



March 27, 2020

Mr. Price Warwick, Jr, Business Manager
IBEW LU 20
684 W. Tarrant Rd.
Grand Prairie, TX 75050

Case Number: 420-6017807
LM Number: 541205

Dear Mr. Warwick, Jr:

This office has recently completed an audit of IBEW LU 20 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, Treasurer Michael Bradshaw, and President Price Warwick, III on March 17, 2020, 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 IBEW LU 20's 2019 records revealed the following recordkeeping violations:

1. Meal Expenses

IBEW LU 20's records of meal expenses did not include written explanations of union business conducted or the names and titles of the persons incurring the restaurant charges. Union records of meal expenses must include written explanations of the union business conducted and the full names and titles of all persons who incurred the restaurant

charges. Also, the records retained must identify the names of the restaurants where the officers or employees incurred meal expenses.

2. Union Owned Vehicles

The union did not maintain records necessary to verify the accuracy of the information reported in Schedules 11 (All Officers and Disbursements to Officers) and 12 (Disbursements to Employees) of the LM-2.

IBEW LU 20 did not maintain records documenting business versus personal use of the union vehicles.

The LM-2 instructions include specific rules for the reporting of automobile expenses. The union must report operating and maintenance costs for each of its owned or leased vehicles in Schedules 11 and 12 of the LM-2 /Item 24 of the LM-3, allocated to the officer or employee to whom each vehicle is assigned.

For each trip they take using a union owned or leased vehicle, officers and employees must maintain mileage logs that show the date, number of miles driven, whether the trip was business or personal, and, if business, the purpose of the trip.

Based on your assurance that IBEW LU 20 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. IBEW LU 20 amended its constitution and bylaws in 2019, but did not file a copy with its LM report for that year.

IBEW LU 20 has now filed a copy of its constitution and bylaws.

Other Issue

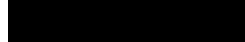
Vacation Policy

As I discussed during the exit interview, the audit revealed that IBEW LU 20 does not have a vacation policy. OLMS recommends that unions adopt written guidelines concerning such matters to ensure vacation leave is documented and approved.

I want to extend my personal appreciation to IBEW LU 20 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

cc: Mr. Michael Bradshaw, Treasurer
Mr. Price Warwick, President
Mr. Mitchell Burchfield, Vice President
Mr. Jacob Minter, Recording Secretary
Mr. Scott Huyck, Jr, Executive Board Member
Mr. Mark Jones, Executive Board Member
Mr. Michael Morley, Executive Board Member
Mr. Richard Kennedy, Executive Board Member
Mr. Patrick Jolly, Executive Board Member
Mr. Tony Lindeman, Executive Board Member
Mr. Alejandro Ponce, Executive Board Member