



August 12, 2020

Mr. Wesley Vogelsong, President
United Steelworkers Local 51M
2120 Baltimore Street
Defiance, OH 43512

Case Number: 350-6017341 [REDACTED]
LM Number: 036391

Dear Mr. Vogelsong:

This office has recently completed an audit of United Steelworkers Local 51M 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 on July 30, 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 Local 51M's 2018 records revealed the following recordkeeping violations:

General Reimbursed Expenses

Local 51M did not retain adequate documentation for reimbursed expenses incurred by the union for steward payments to [REDACTED] and [REDACTED]. In addition, for February 2018 and April 2018 invoices were missing for disbursements to the AFL-CIO in the

amount of \$550; for June 2018 receipts were missing for disbursements to Community Health Profession Hospice in the amount of \$35 and [REDACTED] in the amount of \$100.

As noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

Based on your assurance that Local 51M 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 51M amended its constitution and bylaws in 2017, but did not file a copy with its LM report for that year.

Local 51M has now filed a copy of its constitution and bylaws.

Other Issues

Signatures on Lost Time and Expenses Vouchers

Local 51M had some vouchers missing signatures by the claimant. The voucher indicates that "the member making the claim must sign the voucher."

I want to extend my personal appreciation to United Steelworkers Local 51M 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,

[REDACTED]

Investigator