



April 25, 2024

Mr. Keith Runion, Financial-Secretary  
UAW Local 2021  
1675 N. Union Street  
Fostoria, OH 44830

Case Number: 350-6028102( )  
LM Number: 511769

Dear Mr. Runion:

This office has recently completed an audit of UAW Local 2021 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 April 24, 2024, 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 2021's 2023 records revealed the following recordkeeping violation:

## Lost Wages

Local 2021 did not retain adequate documentation for lost wage reimbursement payments to union officers in at least four instances. The union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS audit found that Local 2021 officers did not always identify on the lost wage vouchers the union business conducted.

During the exit interview, I provided a compliance tip sheet, Union Lost Time Payments, that contained a sample of an expense voucher Local 2021 may use to satisfy this requirement. The sample identifies the type of information and documentation that the local must maintain for lost wages and other officer expenses.

Based on your assurance that Local 2021 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

### Reporting Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-2 filed by Local 2021 for the fiscal year ended December 31, 2023, was deficient in the following areas:

#### 1. 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 2021 amended its constitution and bylaws in 2023 but did not file a copy with its LM report for that year.

As agreed, Local 2021 will file a copy of its current constitution and bylaws with OLMS as soon as possible but not later than May 13, 2024.

#### 2. Loss or Shortage of Funds or Other Assets

Item 13 [LM-2] (During the reporting period did the labor organization discover any loss or shortage of funds or other assets? (Answer "Yes" even if there has been repayment or recovery.) should have been answered "Yes," because during the audit period the union discovered \$443.54 of a \$3,000 check for the purchase of party supplies for the Christmas party was not spent and not refunded to the union. The issue was not discovered until the officers were reconciling the union's books and the union is withholding salary payments until the union is made whole. Local 2021 must report all losses and provide details of the loss in the additional information section of the LM report.

Local 2021 must file an amended Form LM-2 for the fiscal year ended December 31, 2023 to correct the deficient item discussed above. The report must be filed electronically using the Electronic Forms System (EFS) available at the OLMS website at [www.olms.dol.gov](http://www.olms.dol.gov). The amended Form LM-2 must be filed no later than May 13, 2024. Before filing, review the report thoroughly to be sure it is complete and accurate.

I want to extend my personal appreciation to UAW Local 2021 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 solid black rectangular box redacting the signature of the investigator.

Investigator