



May 3, 2024

Cindy Odden, President
Steelworkers, AFL-CIO Local 904
737 Lois Drive
Sun Prairie, WI 53590

Case Number: 320-6027510()
LM Number: 067883

Dear President Odden:

This office has recently completed an audit of Steelworkers, AFL-CIO Local 904 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 Treasurer Bob Downs on April 30, 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.

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-3) filed by Local 904 for the fiscal year ended December 31, 2022, was deficient in the following areas:

1. Officers

The audit revealed Local 904 did not report Trustees Mike Boening and John Rabl as union officers in Item 24 (All Officers and Disbursements to Officers). The union must report in Item 24 all persons who held office during the year, regardless of whether they received any payments from the union.

2. Acquire/Dispose of Property

Item 13 (During the reporting period did your organization acquire or dispose of any assets in any manner other than by purchase or sale?) should have been answered, "Yes," because Local 904 gave away prizes totaling at least \$2,271 at its summer picnic. The union must identify the type and value of any property received or given away in the additional information section of the LM report along with the identity of the recipient(s) or donor(s) of such property. The union does not have to itemize every recipient of such giveaways by name. The union can describe the recipients by broad categories if

appropriate such as “members” or “new retirees.” In addition, the union must report the cost, book value, and trade-in allowance for assets that it traded in.

3. 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 904 amended its bylaws in 2022 but did not file a copy with its corresponding LM report for that year. Local 904 has now filed a copy of its 2022 bylaws.

I am not requiring that Local 904 file an amended LM report for 2022 to correct the deficient items, but Local 904 has agreed to properly report the deficient items on all future reports it files with OLMS.

Other Issue

Grievance Hours

The audit revealed that ContiTech pays Local 904 officers/members grievance hours on occasions that they are absent from work to conduct union business. However, while the use of grievance hours is included in Local 904’s contract with ContiTech, the union does not have written policies that document its grievance hours policies. Additionally, Local 904 did not retain adequate supporting documentation for at least 800 grievance hours ContiTech paid you during the audit year. The audit found that Local 904 retained vouchers for your grievance hours requests, but in many instances the vouchers did not adequately describe the union business conducted.

OLMS recommends that union policies and procedures for requesting grievance hours be reduced to writing and added to your union’s bylaws or discussed at an executive board or membership meeting where they can be supported by entries in the meeting minutes. Once established, it is important that the union consistently follow its procedures for handling requests for employer paid grievance hours. Local 904 may want to have the union’s trustees or auditors compare the steps taken to request grievance hours with the union’s policies to make sure that all required procedures are being followed.

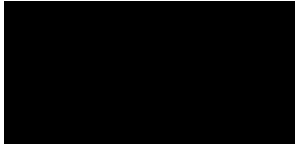
Cindy Odden

May 3, 2024

Page 3 of 3

I want to extend my personal appreciation to Steelworkers Local 904 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: Bob Downs, Treasurer