



May 1, 2014

Ms. Mary Lou Lane, President/Business Manager
Electrical Workers, IBEW, AFL-CIO
Local Union 1944
125 East North Street, Suite 507
New Castle, PA 16101

Case Number: 140-6000914 [REDACTED]
LM Number: 013400

Dear Ms. Lane:

This office has recently completed an audit of Electrical Workers, IBEW, AFL-CIO, Local Union 1944, 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 30, 2014, 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

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 Union 1944's records for 2013 revealed the following recordkeeping violations:

1. General Reimbursed and Credit Card Expenses

Local Union 1944 did not retain adequate documentation for reimbursed expense payments made to union officers totaling at least \$734.40. For example, on November 13, 2012, President Lane was reimbursed \$159.41; however, there was no voucher or supporting documentation in the union records to support the payment.

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.

2. Vacation Records

During the audit it was revealed that prior to 2014, President Mary Lou Lane was not maintaining a record of vacation time accumulated or used. Title II of the LMRDA requires a union to maintain records of vacation time earned and used. During the audit, the union provided a calendar that President Lane now uses to keep track of her vacation hours.

Based on your assurance that Local Union 1944 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(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 and bylaws. Local Union 1944 was deficient in the following area:

Failure to File Bylaws

Local Union 1944 amended its constitution and bylaws in March 2010 but did not file a copy with its LM report for that year. Local Union 1944 provided a copy of their constitution and bylaws to OLMS during the compliance audit.

I want to extend my personal appreciation to Local Union 1944 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

cc: Brian Brennan, Field Service Representative, 3rd District
Patty Krushnowski, Executive Board Member, Local Union 1944
Jack Valovage, Vice President, Local Union 1944