



December 20, 2018

Ms. Cynthia McNeilance, Treasurer  
APWU LU 1348  
2875 E. Admiral Pl  
Tulsa, OK 74110

Case Number: 420-6014774  
LM Number: 092526

Dear Ms. McNeilance:

This office has recently completed an audit of APWU LU 1348 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, President Charley Mose, Vice President Jeffery Bradley, Legislative/Communication Director Loretta Hackman, Trustee Tony Helvy, Trustee Steve Johnson, and Trustee Julie Weare on December 18, 2018, 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 LM-3 filed by APWU LU 1348 for the fiscal year ended December 31, 2017, was deficient in the following areas:

1. Disbursements to Officers

APWU LU 1348 did not include some reimbursements to Cynthia McNeilance totaling at least \$205.10 in the amounts reported Item 24 (All Officers and Disbursements to Officers). It appears the union erroneously reported these payments in Item 48.

The union must report most direct disbursements to APWU LU 1348 officers and some indirect disbursements made on behalf of its officers in Item 24. A "direct disbursement" to an officer is a payment made to an officer in the form of cash, property, goods, services, or other things of value. See the instructions for Item 24 for a discussion of certain direct disbursements to officers that do not have to be reported in Item 24. An "indirect disbursement" to an officer is a payment to another party (including a credit card company) for cash, property, goods, services, or other things of value received by or on behalf of an officer. However, indirect disbursements for temporary lodging (such as a union check issued to a hotel) or for transportation by a public carrier (such as an airline) for an officer traveling on union business should be reported in Item 48 (Office and Administrative Expense).

2. 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. APWU LU 1348 amended its constitution and bylaws in 2006, but did not file a copy with its LM report for that year.

APWU LU 1348 has now filed a copy of its constitution and bylaws.

I am not requiring that APWU LU 1348 file an amended LM report for 2017 to correct the deficient items, but APWU LU 1348 has agreed to properly report the deficient items on all future reports it files with OLMS.

Other Violation

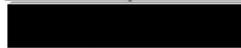
Unauthorized Cash Withdrawal

During the audit period, there were a total of two unauthorized cash withdrawals totaling \$870.00 made by President Charley Mose. The cash withdrawals did not contain supporting documentation. The two cash withdrawals only contained one signature. Mose repaid the union on March 15, 2017 and March 23, 2017.

The union has agreed to no longer make cash withdrawals by a single signatory. All union disbursements will have proper authorization and approval by the membership.

I want to extend my personal appreciation to APWU LU 1348 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. Charley Mose, President  
Mr. Jeffery Bradley, Vice President  
Mr. Tony Helvy, Trustee  
Mr. Steve Johnson, Trustee  
Ms. Julie Weare, Trustee  
Ms. Loretta Hackman, Legislative/Communication Director