

U.S. Department of Labor

Office of Labor-Management Standards  
Division of Enforcement  
Washington, DC 20210  
(202) 693-0143 Fax: (202) 693-1343



August 14, 2018

[REDACTED]

Dear [REDACTED]

This Statement of Reasons is in response to your complaint, received by the Department of Labor on December 11, 2017, alleging that violations of Title IV of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA), occurred in connection with the August 18, 2017 officer election conducted by the National Rural Letter Carriers Association (NRLCA).

The Department of Labor (Department) conducted an investigation of your allegations. As a result of the investigation, the Department concluded with respect to the specific allegations, that there were no violations that may have affected the outcome of the election.

You alleged that the Director of Labor Relations, [REDACTED], promoted the candidacy of certain candidates at meals paid for with his union-issued credit card. You identified two members whom you alleged heard J [REDACTED] disparage your candidacy and promote that of [REDACTED], your opponent for the office of Director of Steward Operations. Section 401(g) prohibits the use of union funds or resources to promote any person's candidacy in a union officer election.

You identified seven instances in 2017 where [REDACTED] allegedly campaigned while using his union-issued credit card to purchase meals and/or drinks for members and candidates. The NRLCA issues credit cards to every officer, including [REDACTED]. For any purchases made with the union credit card, officers are required to list the union business purpose for the expenditure and identify the attendees whose expenses were covered. The Department's investigation disclosed that in all seven instances, [REDACTED] union credit card invoices identified both the union business purpose for the meals and the attendees. In each of those instances, the investigation revealed that no improper campaigning occurred. Further, even if a violation had occurred, there would have been no effect on the outcome of either your or [REDACTED] races. You won against [REDACTED] by a margin of 291 votes; J [REDACTED] ran unopposed. There was no violation affecting the outcome of the election.

You also alleged that [REDACTED] purchased meals and drinks for candidate [REDACTED] and his date on May 7, 2017 at the Mid-States Conference in Fargo, North Dakota. The investigation disclosed instead that [REDACTED] paid for his own and his date's meals and drinks. Further, no voting delegate was in attendance at this post-conference meal. There was no violation.

For the reasons set forth above, it is concluded that no violation of the LMRDA occurred that may have affected the outcome of the election. Accordingly, the office has closed the file in this matter.

Sincerely,

[REDACTED]

Sharon Hanley  
Chief, Division of Enforcement

cc: Jeanette Dwyer, National President  
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