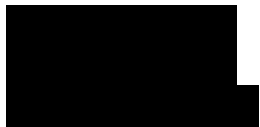




March 31, 2014



Dear [REDACTED]:

This Statement of Reasons is in response to your complaint received by the U.S. Department of Labor on October 17, 2013, alleging that violations of Title IV of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA), occurred in connection with the rerun delegate election of Local 880 Food and Commercial Workers International Union concluded on July 31, 2013.

You made several allegations concerning Local 880's delegate election and seek a new election of Local 880 delegates. The delegates elected at Local 880's rerun July 31, 2013 election had a sole function: to attend the August 2013 International Convention and to elect international officers at the International Convention on August 13, 2013. Local 880's delegate election was covered by Title IV of the LMRDA only because those delegates participated in the election of International officers. 29 C.F.R. § 452.22. Having served that sole purpose, those delegates have no further functions to perform. Accordingly, even if all of your allegations were substantiated as meritorious, there is no effective remedy available because the functions that brought the delegates within the coverage of the LMRDA have already been performed.

With respect to the election of international officers at the International Convention, any protest should have been lodged with the International within thirty days of its convention, pursuant to Article 17(N) of the International Constitution. The time for filing such a protest expired September 12, 2013.

Because there is no remedy that can be provided to correct any local delegate election improprieties, even if substantiated, I have closed the file in this matter.

Sincerely,

Patricia Fox
Chief, Division of Enforcement

cc: Mr. Joseph T. Hansen, International President
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Washington, DC 20006

Mr. Robert W. Grauvogl, President
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