

**SERC DECISION REGARDING ELECTION CHALLENGES
TO 2019 ELECTION FOR GUILD PRESIDENT**

August 12, 2019

Introduction

On May 16, 2019, the TNG-CWA Sector Election and Referendum Committee [SERC] certified the results of the 2019 referendum election and declared Bernie Lunzer duly elected as President of The NewsGuild-CWA. The certified election results showed 1,282 votes for Lunzer and 1,021 for Jon Schleuss. The margin of victory is 261 votes. Following the announcement of the results, the SERC received three election challenges pursuant to the SERC's election appeals procedure:

1. A challenge received from Kamala Rao by email on May 26, 2019;
2. A challenge received from Jon Schleuss, dated May 24, 2019 received by email on May 25, 2019; and
3. A challenge, in the form of a petition, received by email on May 25, 2019 from Fatima Hussein, among others.

I. The Rao election challenge.

Kamala Rao is President of Canadian Media Guild [CMG], the largest local in TNG-CWA. Rao's challenge complains about the conduct of her own local, alleging that an "unacceptably high level" of errors were included in the membership database it provided to the SERC for use in the election, including incorrect home addresses for CMG members. Rao Complaint, page 2. Rao admits to a "legacy of deficiency in CMG's information-handling processes." Rao, p. 5. She asserts that "approximately one thousand five-hundred (1500) or so out-of-date mailing addresses were inadvertently included on the CMG ballot distribution list, effectively disenfranchising a very significant number of eligible voters at our Local." Rao, p. 3. In follow-up communications with the SERC, Rao reported that CMG may have made further errors in designating certain nonmembers as Guild members on the CMG eligibility list.

To be clear, in conducting Guild officer elections, the SERC is reliant on Guild locals to provide accurate and complete membership information, including correct home addresses, in order to permit the mailing of election notices and ballots to members.¹ It is the express constitutional

¹ Unlike with CWA, where dues monies, checkoff remittances, and membership information supplied by employers pursuant to collective bargaining agreements generally come directly to the international union, it is *Guild locals* that generally receive dues payments, remittances and membership contact information, given that Guild collective bargaining agreements are held at the local level. (Among other limited exceptions, Guild at-large members send their remittances directly to TNG.)

responsibility of all Guild members to notify their locals of any changes in their home address information; and it is the express constitutional responsibility of every Guild local to timely provide that updated information to CWA so that the CWA membership database available to the SERC remains reliable and up to date. Guild Constitution, Article XIII.5.

The SERC generates initial eligibility lists from the CWA membership database, and then sends an initial eligibility list to each Guild local for its review and correction. Pursuant to Article XXII.6(d) of the Guild constitution, Guild locals are required to review and update the membership information reflected in their initial eligibility lists during a thirty (30) day challenge period. During that challenge period, locals must correct the membership information derived from the CWA database (including updating home addresses) to ensure proper enfranchisement of their local members in good standing, and to further ensure that those who are not eligible to vote are deleted from the list. The SERC utilizes the updated and corrected information received from Guild locals to generate an official eligibility list of local members in good standing to whom election notices and ballots are sent.

Here, CMG was responsible for correcting the initial eligibility list generated from the CWA membership database during the constitutional challenge period that ran from February 11 through March 13, 2019. According to Rao's challenge, instead of performing a diligent review during the constitutional challenge period, CMG admittedly made only "some relatively minor amendments" to the list. Rao, p. 2. Rao represents that CMG undertook a more thorough review of its membership data only after the election results were certified.

The SERC has undertaken a complete investigation of the allegations raised by Rao's election challenge to determine whether CMG's membership information previously provided to the SERC resulted in either: the improper disenfranchisement of members in good standing (by virtue of bad address information or other errors or omissions); and/or the improper enfranchisement of nonmembers, through their erroneous identification by CMG as "members" on the updated eligibility list.

The SERC investigation has encompassed detailed and repeated requests for information and has continued throughout the course of numerous weeks, as the SERC has carefully gathered, analyzed, and cross-referenced voluminous membership data. The SERC has also undertaken a broader investigation of the membership information provided by other Guild locals during the last election. The SERC's extended investigation has been necessary to ensure not only a proper resolution of the pending election complaints, but the creation of a reliable, complete and up to date membership database for any future Guild officer election.

Based on its investigation of the Rao complaint, the SERC has determined that CMG provided deeply flawed and unreliable membership information during the course of the prior referendum process, which was utilized by the SERC in the mailing of election notices and ballots. Specifically, the SERC finds that ***CMG provided more than 1,089 incorrect home addresses for CMG members in good standing who were entitled to vote in the prior election.***

The SERC further finds that during the election process, ***CMG erroneously identified to the SERC as members in good standing approximately 942 individuals who are not Guild***

members, but who are instead what are known in Canada as “Rand formula dues payers.” To be clear, Rand formula dues payers have not signed a Guild membership card, are not Guild members, and are not entitled to the privileges of Guild membership, including the right to vote in Sector elections.²

The SERC has concluded that the widespread and documented errors on the part of CMG in the course of the Guild election, and the Local’s violation of its constitutional duties to properly vet and update the initial eligibility list, resulted in the disenfranchisement of more than 1,000 Guild members in good standing in that local alone -- numbers that far exceed the margin of victory between Lunzer and Schleuss (261) in the certified election results. CMG’s egregious errors further allowed at least some nonmembers to improperly receive an election notice and a ballot.³ Because CMG’s errors were so numerous as to impact the outcome of the election, the SERC has no choice but to order a rerun election for the position of Guild President on this ground alone.⁴

The SERC has determined that the rerun election shall be conducted by the American Arbitration Association [AAA], as a third party contractor expert and experienced in the administration of union elections. See 29 CFR 452.98. Use of AAA will lift from the SERC and assisting Guild staff the considerable physical and administrative burden posed by their responsibility to conduct an international mail referendum under complex and onerous election rules and constitutional requirements with limited resources. Equally important, use of AAA to administer the rerun election will ensure confidence in a fair and democratic international referendum process, in the circumstances of an unprecedented rerun election involving one of the Guild’s highest constitutional offices.

AAA shall conduct the rerun election under the SERC’s direct supervision, as the TNG Constitution expressly requires. In accordance with Article XXII, Section 5, the SERC shall continue to oversee the election process, decide all “questions and controversies” regarding the conduct of the election and certify the rerun election results.

² Both the TNG Constitution and the CMG bylaws require all members to sign an application for membership.

³ Many of the approximately 942 nonmembers improperly listed by CMG as “members” on the final eligibility lists did not have correct home addresses and therefore likely did not receive a ballot. However, the SERC investigation has confirmed, through the cross-referencing of data and eligibility lists, that at least some nonmembers improperly received election notices and ballots due directly to CMG’s errors.

⁴ The SERC has reached this conclusion despite its own efforts in the course of the election process to attempt to ensure that those members in good standing who did not receive a ballot, due to bad address information provided by Guild locals or otherwise, could obtain a replacement ballot in sufficient time to vote. The SERC published prominent links on the Guild website for many weeks during the balloting period to assist members in easily obtaining a replacement ballot. Those links were also widely published by both candidates on their campaign sites and by many Guild locals on their Facebook and Twitter accounts. And indeed, many Guild members requested and received replacement ballots. Moreover, envelopes with election materials that were returned due to bad address information were re-mailed by the SERC to available forwarding addresses. However, the widespread and documented errors in membership information provided by CMG rendered the SERC’s efforts unsuccessful; even assuming that all five CMG replacement ballots went to members in good standing, as opposed to nonmembers (a fact that cannot be safely assumed, given the results of the SERC investigation) the numbers of CMG members in good standing who did not receive ballots (1,084) would far exceed the margin that separated the winning and losing candidates.

The rerun election shall be conducted pursuant to the 2019 Rerun Election Calendar, a copy of which is attached to this decision. In setting this calendar, the SERC has endeavored to adhere as much as practicable to the numerous constitutional procedures and deadlines set forth in Article XXII of the Guild Constitution. However, to ensure proper enfranchisement of the Guild membership and given the passage of time since the initial good standing eligibility period was determined, the voter eligibility requirements for the rerun election have been adjusted accordingly.⁵ Thus, the SERC holds that the good standing eligibility period shall be those members in good standing in June, July or August, 2019 based on September 16, 2019⁶ dues remittances.

To ensure full enfranchisement and through the auspices of the AAA, the SERC shall mail to the entire Guild membership (including those members who are not currently in good standing, and those who do not currently meet the good standing requirement of the eligibility period for the rerun election), to their last known home addresses, an initial notice of the rerun election that shall clearly and prominently state the good standing requirements for voting in the rerun election, and the deadline for dues remittances to attain voter eligibility. Such mailing shall be postmarked no later than August 21, 2019.⁷

To further ensure full membership enfranchisement, the SERC has diligently requested and obtained from all Guild locals corrections to bad address information uncovered during its investigation, as well as updated membership information. This rigorous vetting of the Guild membership database, as well as the locals' additional review and correction of eligibility lists during the upcoming 30-day constitutional challenge period reflected in the Rerun Election Calendar, should ensure that all Guild members eligible to vote will receive a ballot. Finally, the SERC is instructing the AAA to run TNG mailing lists through commercially available "address correction" databases, to automatically re-mail any returned bad address election packets to available forwarding addresses, and to contact the SERC throughout the balloting period if and when election packets are returned without forwarding addresses. The SERC intends to instruct Guild locals to immediately and diligently follow up with their members and further review updated membership information provided by employers under Guild contracts, to seek to obtain corrected address information from any source.

The rerun election shall proceed by paper ballot. To be clear, Article XXII.6(k) of the Guild Constitution permits electronic voting only in circumstances where the Guild Executive Council

⁵ Article XXII.6(b) of the Guild Constitution provides that: "In the case of Sector elections, membership in good standing shall be that in good standing in any of the three months preceding by at least 30 days the month of nominations as shown by remittances received not later than the 15th day of the month preceding...[sic] the nominations." The original good standing eligibility period was September, October and November, 2018 based on December 15, 2018 remittances.

⁶ As September 15 is a Sunday, the SERC has moved the deadline for dues remittances to Monday, September 16, 2019.

⁷ This mailing will not go to agency fee payers or Rand formula dues payers. Guild locals are nonetheless encouraged to reach out to nonmembers in their bargaining units to solicit increased Guild membership and to discuss the privileges of such membership, including eligibility to vote in Sector elections if membership and dues remittance requirements are met.

has affirmatively authorized use of that method in a particular Guild election. That is not the case here.

The Rao complaint maintains that electronic balloting provides distinct advantages that the SERC should consider. The SERC is informed that the Executive Council carefully considered and rejected the use of electronic balloting in the 2019 Sector officer election, due to its prudent assessment of the legal risks posed by the use of that method, in light of the complex and onerous requirements imposed under federal labor union election law. Although the Executive Council considered the 2016 electronic balloting “compliance tips” published on the DOL’s Office of Labor-Management Standards [OLMS] website, the Executive Council was also well-advised of the absence of final governing DOL regulations regarding electronic balloting and the problems and pitfalls other unions have encountered when they have attempted, unsuccessfully, to conduct electronic balloting in a manner that would pass muster with the DOL and the courts.⁸ In this circumstance, the Executive Council made the considered judgment not to authorize electronic voting in the 2019 Guild Sector election. For what it is worth, the SERC agrees with that judgment, and in any event must follow it.⁹

It is worth noting that the use of electronic balloting would not eliminate the problems raised by the Rao complaint or the particular challenges that underlie the SERC’s decision to call for a rerun election: namely, the need for the SERC to have access to an accurate, reliable and complete membership database, including correct home addresses for Guild members. Governing election law requires that *paper* election notices be *mailed* to all members at their *home address* at least 15 days before the election -- even in the circumstances of electronic balloting.

Finally, Rao relies on the experience of Canadian Guild locals in conducting electronic balloting for their local elections. Such experience is of no practical or legal relevance here. Any requirements under which Canadian local union elections must be conducted are far different from – and far less onerous than -- the DOL regulations that govern the election of Guild officers. And, to be clear, although they do not apply to elections for Canadian local union officers, those DOL regulations do apply to the conduct of any balloting for Guild President, even among Guild members residing in Canada who belong to Canadian Guild locals.

⁸ As the OLMS electronic balloting Guidance expressly cautions: “Two significant challenges are the tension between maintaining the secrecy of the ballot while ensuring that each eligible member’s vote is accurately cast, and ensuring observability for a voting technology that does not necessarily generate “ballots” that can be observed at the “polls” and at their “counting,” as the LMRDA provides. Because the technology in this field is evolving, *it is difficult to identify definitive solutions that are most likely to permit voting that is in conformance with the LMRDA.*” Emphasis added.

⁹ In an extremely late filing submitted weeks after the governing deadline, CMG cited the experience of three CWA locals in using electronic balloting for their local elections. Even if the SERC were to consider this late filing, the fact that those local elections proceeded without challenge does not mean that the balloting procedures used would withstand DOL scrutiny if a formal election challenge had been filed.

II. The Schleuss and Hussein election challenges.

Even though our disposition of the Rao challenge by ordering a rerun election renders consideration of the Schleuss and Hussein challenges unnecessary, we nevertheless do so in the interest of reporting the full extent of our investigation and findings.

A. The composition of the SERC.

Jon Schleuss and Fatima Hussein et al. complain that the SERC and its members were biased in their decision-making, were “secretly elected,” or were “part of a cover-up.” The SERC finds no merit to these allegations.

Article XXII, Section 5 of the Guild Constitution provides: “There shall be a Sector Election and Referendum Committee (“SERC”) consisting of seven members of the Guild selected by the Sector Conference in election years.” The Rules and the Agenda adopted by the delegates to the 2019 Guild Sector Conference provided for nominations of SERC members on the first day of the Sector Conference, followed by a run-off election on the following day in the event that more than seven candidates were nominated. We find that the SERC members (and alternates) were openly and properly nominated by a conference delegate and were thereafter duly elected by acclamation of the delegates, all in accordance with constitutional procedures, Sector Conference Rules, and *Robert’s Rules of Order*. Any allegation to the contrary is baseless. The SERC shall continue to discharge its constitutional duties during the course of the rerun election accordingly.

B. The role of the Executive Vice President.

Schleuss and Hussein complain that the EVP’s involvement in the administration of the election procedure was improper, or amounted to her serving as an “election official.” Hussein Complaint, page 1. The SERC finds no merit in these allegations.

The constitutionally mandated role of the Executive Vice President of the Guild is to serve as a liaison for the SERC in communications with Guild locals at various stages of the election process. See, e.g., Article XXII, Section 6(c) (EVP must send notification of election and initial eligibility lists to Guild locals “under the direction of the SERC”); Article XXII, Section 6(d) (“The SERC shall direct the Executive Vice President to contact” locals who have not submitted eligibility list challenges or designated method of balloting.). The DOL’s guidance in union election administration, posted on the OLMS website, has consistently acknowledged that it is proper for incumbent union officers and staff to discharge the nondiscretionary, administrative requirements of a union election in accordance with governing constitutional procedures. See e.g. December 20, 2018 Statement of Reasons regarding CWA Local 1105. Again, under the Guild Constitution, all “questions and controversies regarding the conduct of the election” remain with the SERC.

The SERC therefore determines that the EVP shall properly continue to discharge her constitutional role in the rerun election as a liaison between the SERC and the Guild membership with one exception: the EVP has requested and the SERC has agreed that the AAA shall serve as the liaison on behalf of the SERC for all requests from members for replacement ballots and challenged ballots. Thus, at the EVP’s request, all communications regarding replacement

ballots and challenged ballots shall be processed by the AAA, and not the office of the EVP, to ensure the utmost confidence in the elections process in the circumstances of the rerun election.

C. The Nominations Process.

In his complaint, Schleuss alleges that the nominations process for Guild Sector officers at the January 2019 Sector Conference, or the notice of nominations that preceded it, were legally or constitutionally flawed. The SERC finds no merit in this claim.

Pursuant to Article IX, Section 3 of the Guild Constitution, nominations for Sector officers are made solely by Sector Conference delegates elected by secret ballot by their local membership. Nominations occur only at the Sector Conference, pursuant to a four (4) year election cycle. If Sector Conference delegates nominate only one candidate for a Sector Office, the Constitution provides for that individual “to be declared elected.” If the delegates nominate two or more candidates for a particular Sector office,¹⁰ an election referendum is then conducted under the auspices of the SERC. This is the exclusive constitutional method of nominations for Guild Sector offices – and has been since the Guild’s inception.

Schleuss’s assertion that the Guild had a legal obligation to send a notice of nominations for Sector Officers to all Guild members is simply incorrect. As a national and/or international labor organization that, under federal election law, properly nominates its Sector Officers at Sector Conference exclusively through delegate nominations, the Guild is not required to provide a notice of nominations to the Guild membership at large. See e.g., *Carpenters Regional Council*, DOL Statement of Reasons dated April 17, 2019; *New Jersey Rural Letter Carriers Association*, DOL Statement of Reasons dated June 8, 2009.¹¹

DOL regulations also make clear that there is no particular method of notice that must be given with regard to nominations; certainly there is no obligation to give mail notices 15 days in advance of nominations, as applies to the notice of election. 29 CFR Section 452.56.

Nor does the Guild Constitution impose any particular notice obligation regarding Sector Officer nominations.¹² Notwithstanding, the Guild engaged in sustained efforts over the course of more

¹⁰Article IV.3 provides for runoff balloting at the Sector Conference where more than two candidates are nominated, to allow two candidates to be placed on the referendum ballot.

¹¹ The Guild Executive Board has ruled that those individuals who, pursuant to Article 18.5 of the Guild Constitution, have signed a membership card during an organizing campaign, but who have not begun to pay Guild dues, are not members in good standing in accordance with the Guild Constitution. Although they are free at any time to commence paying Guild dues, until they do so and thus attain good standing membership, they have no right to run for Guild office, to attend a Sector Conference as a delegate, or to nominate candidates for Sector Office as a Conference delegate. As such, it is not improper for them to be excluded from those who receive notice of nominations.

¹² The Guild must simply give at least 30 days’ notice to its locals of the Sector Conference, and further notify them of the number of delegates to which they are entitled, based on their average per capita payments for members in good standing. Article VII.1 and 2; Article VIII.2. That notice has historically been given through an Official Call of the Sector Conference – which in this instance was sent to Locals in October 2018, well more than 30 days in advance of the Sector Conference, and in sufficient time to allow locals to conduct secret ballot elections of their Conference delegates.

than eighteen (18) months to publicize the upcoming nominations process for Guild officers at the 2019 nominating Conference.

- On July 11, 2017, the Guild first posted on its website¹³ a notice that nominations for Guild officers would be taken at the 2019 Sector conference, to be held in January or February of that year.¹⁴ This website notice of the nominating conference was continuously maintained and periodically updated, in September 2017 and March 2018. Throughout this time period, there was frequent and widespread discussion within the Guild membership, including at numerous Guild local meetings and district council meetings regarding the upcoming nominations for Sector Offices at the 2019 Sector Conference.
- In October 2018, the Guild sent its Official Call for the 2019 Sector Conference to all Guild locals. That Official Call stated the date, time and place of the Sector Conference, and an instruction for locals to convene secret ballot elections of delegates to the 2019 Sector Conference, given the constitutional role that the delegates play in the nomination and election of Guild Sector officers.¹⁵ In accordance with that Convention Call, each Guild local elected their delegates by secret ballot; and in the course of those local delegate nominations and elections, engaged in further membership discussions regarding the nominations process for Guild Sector Officers that would take place amongst Conference delegates at the 2019 Sector Conference, including the precise date, time and location of the nominating Conference that the elected delegates would attend.
- On December 13, 2018 – forty-four (44) days before nominations were taken at the Sector Conference – the Guild posted a notice on its website of the dates of the January 2019 Sector Conference and a further notice that nominations would be taken at that Conference for all Guild Sector offices, describing the offices in question.
- On January 2, 2019 – twenty-five (25) days before nominations were taken at the Sector Conference -- the Guild posted a final notice on the Guild website, stating that Conference delegates would nominate Guild officers at the upcoming Sector Conference, describing the Sector offices for which nominations would be taken, and further explaining the specific location and dates of the Conference, as well as its opening and closing times.

Beyond these published notices, each elected delegate attending the Sector Conference was given a detailed, proposed agenda immediately before the Conference began, clearly stating the date and time when nominations would be taken for each Sector Office. That same agenda was

¹³Under the Constitution, the Guild website is considered the official publication of TNG-CWA.

¹⁴The date of the Sector Conference had not yet been set.

¹⁵Article VII, Section 3 of the Guild Constitution requires that all delegates and alternates to Sector Conferences “must be a Guild member in good standing of the Local which designates him or her.” Article 8.1 and Article XI.6 require that delegates and alternates be elected by the membership, by secret ballot. Thus, in order to nominate a candidate for Sector Office, a Guild member must be a member in good standing who has paid dues to the Guild.

duly adopted by the credentialed delegates at the commencement of the Conference, in accordance with the 2019 Sector Conference Rules, also adopted by the delegates.

Nominations proceeded on the morning of Saturday, January 26, 2019 in accordance with the adopted Sector Conference Agenda. Thus, the delegates had clear advance notice of when the nominations would occur. The Guild Sector Chairperson who presided over the Conference made certain, in accordance with *Robert's Rules of Order*, that all delegates were given a full opportunity to nominate the candidates of their choice for each Guild Office.¹⁶ No delegate complained about an inability to make a desired nomination of a candidate. On these facts the SERC finds that Conference delegates were given “ample opportunity to nominate candidates on behalf of themselves or the members they represent.” 29 CFR 452.63.

The SERC also finds that the Guild provided reasonable notice of nominations to Conference delegates, consistent with its longstanding practices, including the location, date, time and manner of nominations by delegates at the Sector Conference, and the offices for which nominations would be taken. There is no evidence that any Conference delegate failed to understand how or when nominations would be taken at the Conference. There is no evidence that any delegate was otherwise frustrated in seeking to make a nomination; or that any Guild member in good standing who sought to be nominated was not. Indeed, notwithstanding his complaint, Schleuss has admitted that the Guild gave several weeks’ advance notice on the Guild website of the details and timing of the nominations process, and that he had personally consulted that notice. Plainly, he had sufficient notice of nominations as he arranged for his own nomination for Guild President by a credentialed delegate at the Sector Conference.¹⁷

Based on these facts, the SERC finds no violation with regard to the nominations for Sector Officers.

III. Other issues.

The SERC declines to address the remainder of the allegations contained in the various election complaints, in light of its order of a rerun election and the comprehensive remedial actions to be undertaken in accordance with this decision, which fully meet the concerns those allegations raised.

Finally, the SERC notes that although it is ordering a rerun election, in accordance with LMRDA Section 402(a)(2) and DOL regulation §452.136(c), Bernie Lunzer will continue as Guild President during the course of the rerun election, and may continue to exercise and discharge the constitutional authority and obligations of that office at least until the results of the rerun election are certified.

¹⁶ Before nominations were closed for a particular office, the Sector Chairperson asked repeatedly, in accordance with *Robert's Rules*: “Any there any more nominations? Are there any more nominations? Are there any more nominations?” Only after the Sector Chairperson determined that there were no further nominations by Conference delegates did she close the nominations for that particular office.

¹⁷ Schleuss was able to accomplish this even though he was not a member in good standing until he first paid dues on the day before the opening of the Sector Conference.

Given the impact on the Guild membership of the SERC's unprecedented decision to order a rerun election for the position of Guild President, the SERC shall ensure the prominent publication of this decision and the rerun election calendar on the Guild's website, Facebook and Twitter accounts, and the distribution of the decision to Local leadership, with instructions that they distribute these materials to local members through all reasonably available means.

TNG-CWA SECTOR ELECTION AND REFERENDUM COMMITTEE

Scott Edmonds, Chair
Mark Pattison
Amy Lampkin
Patricia Doxsey
Kim Leiser
Lois Kirkup
Joe Smydo

In addition to the above-named members of the SERC, the following committee alternates also support the decision to order a rerun election for the position of Guild President: Stevie Blanchard, Mark Gruenberg and Necole Sims.

(Rerun Election Calendar, next page)

2019 GUILD PRESIDENT ELECTION REFERENDUM
SERC RERUN ELECTION CALENDAR

Eligible to vote if member in good standing in **June, July, or August 2019** based on **September 16, 2019** remittances

Initial eligibility lists sent to locals by **Wednesday, September 18** by overnight mail for review, correction and certification of membership in good standing and address information. Includes notification of upcoming rerun election and six-day voting period (November 12-17, 2019) set by SERC for any locals conducting in plant balloting

Locals planning to employ a different method of balloting than the method used in the first election must notify Executive Vice President of its intent to change balloting method by **Wednesday, October 2**

EVP to contact locals that have not submitted certified corrections to eligibility lists – **Thursday, October 3**

Last day of eligibility protest period (challenge period) – **Friday, October 18**

Election notices mailed by American Arbitration Association to all members no later than **Friday, October 25**. On the same date:

- AAA shall mail in-plant balloting packets to locals that selected that method of balloting. (Balloting packets include ballots, inner envelopes, pre-addressed business reply envelopes, one for each eligible voter.)
- AAA shall mail ballots and election notices directly to members of all other locals.

Six-day voting period for locals conducting in-plant balloting – **Tuesday, November 12-Sunday, November 17**

Locals conducting in-plant balloting must confirm that balloting has been completed - **Monday, November 18**

- EVP to immediately contact any local that does not confirm in-plant balloting and ballot distribution.

SERC to mail new election notice and ballots directly to members of any local that fails to conduct/confirm in-plant balloting – As early as **Tuesday, November 19**

Deadline for locals that conducted in-plant balloting to return voting materials – **Thursday, November 21**

Collection of ballots from AAA PO Box – **5 pm (eastern) Tuesday, December 10**

AAA/SERC count and certification – **December 10 and remainder of week until complete**

<end>