# Article 19 Formal Charge Submission

**To:** Office of the President – HEU

**Complainant:**

**Phone**:

**Email**:

**Respondent:**

1. Barb Nederpel – President, HEU Provincial Executive

2. Betty Valenzuela – Financial Secretary, HEU Provincial Executive

**Section A – Charges**

This formal charge is submitted under Article 19, Section A and B of the HEU Constitution for violating the union's constitution and financial bylaws. The respondents, President Barb Nederpel and Financial Secretary Betty Valenzuela, knowingly authorized and oversaw the expenditure of $470,401.04 on political advertising during the 2024 election cycle. This exceeded the explicit constitutional limit of $375,000 set for political education and action between October 20, 2022 and October 20, 2024.

**Section B – Offenses**

The actions of the respondents constitute a breach of the following:
1. Article 2, Section A – Political Education & Political Action Fund cap of $375,000.
2. Article 6 & 7 – Responsibilities of Provincial Executive Officers and Financial Secretary.
3. Article 19 – Misuse of union funds, misconduct in office, and violation of the HEU Constitution.

**Section C – Form of Charges**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_-, do hereby charge Barb Nederpel and Betty Valenzuela with willful violation of the HEU Constitution and misappropriation of union funds.

 **Requested Penalty:**

1. Immediate suspension of both respondents pending an investigation.
2. A full external audit of political spending between October 2022 and October 2024.
3. Disciplinary action including permanent removal from office if found guilty.
4. Referral of findings to Elections BC and CUPE National if appropriate.
5. Publication of findings to all HEU locals and members.

**Section D – Supporting Documents**

Attached: Elections BC Third Party Sponsor Disclosure Report (2024), signed by Betty Valenzuela.

**You’re Name**

Local:

Position: