



LIBERTY  
JUSTICE CENTER

October 1, 2024

**Via Certified Mail & Email**

Mrs. Stacey Davis Gates, President  
Mrs. Maria T. Moreno, Fiscal Secretary  
Chicago Teachers Union  
1901 W. Carroll Ave.  
Chicago, IL 60612  
leadership@ctulocal1.com

**Re: Audits For Fiscal Years 2019-2020, 2020-2021, 2021-2022, 2022-2023,  
2023-2024**

Dear President Gates and Secretary Moreno:

As pro bono counsel to five members of the Chicago Teachers Union, we request the release of CTU's audited financial reports for the fiscal years identified above, as required by CTU's Constitution and Bylaws.<sup>1</sup>

Annual audited reports are vital for transparency and accountability to the nearly 30,000 Chicago educators whose membership dues fund the CTU. Under Article VI, § 1.d of the CTU Constitution, the Financial Secretary must "furnish an audited report of the Union, which shall be printed in the Union's publication." Similarly, Article VI, § 2.a requires the Board of Trustees to "procure an annual audit of the Union's finances for the fiscal year ending June 30 and make it available to members." It appears that the last published audit covered FY2018 through the second quarter of FY2019.<sup>2</sup>

Our clients do not wish to engage in unnecessary litigation, as they believe their dues are better spent on representing the interests of CTU members than on defending against a lawsuit. Accordingly, they have asked us to give CTU an opportunity to voluntarily furnish all missing audit reports within one week of the date of this letter. Failure to comply will result in legal action to compel production of the reports.

Respectfully,

Dean McGee  
dmcgee@ljc.org

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<sup>1</sup> <https://www.ctulocal1.org/union/constitution/>

<sup>2</sup> [https://www.ctulocal1.org/wp-content/uploads/2021/03/FY19\\_CTU\\_Combined\\_Financial\\_Report\\_Final\\_.pdf](https://www.ctulocal1.org/wp-content/uploads/2021/03/FY19_CTU_Combined_Financial_Report_Final_.pdf)