## U.S. Department of Labor

Office of Labor-Management Standards Dallas-New Orleans District Office A. Maceo Smith Fed. Bldg. 525 Griffin Street, Suite 300 Dallas, TX 75202 (972) 850-2500 Fax: (972) 850-2501



May 26, 2016

Mr. Gary Aaron, Secretary - Treasurer APWU Local Union 8006 Case Number: 420-6007175 LM Number: 544087

Dear Mr. Aaron:

This office has recently completed an audit of APWU Local Union 8006 under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). As discussed during the exit interview with you on May 25, 2016, the following problems were disclosed during the CAP. The matters listed below are not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

## Reporting Violation

The audit disclosed a violation of LMRDA Section 207(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations within 90 days of its reporting period. The Labor Organization Annual Report (LM-4) for the fiscal year ended December 31, 2015 was not filed.

Failure to File LM Report

The LM-4 Report for fiscal year ending December 31, 2015 was due on or before March 31, 2016. The report was not submitted by the due date.

Local 8006 has now filed the LM-4 Report for fiscal year ending December 31, 2015 and has agreed to file future reports on time. No further action will be taken on this violation.

## Other Issue

Signing Blank Checks

During the audit, you advised that you and President Tim Smith sign blank checks. Your union's bylaws require that all checks be signed by the president and treasurer. The two signature requirement is an effective internal control of union funds. Its purpose is to attest to the authenticity of a completed document already signed. However, signing a blank check in advance does not attest to the authenticity of a completed check, and negates the

purpose of the two signature requirement. OLMS recommends that Local 8006 review these procedures to improve internal control of union funds.

I want to extend my personal appreciation to APWU Local Union 8006 for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,

Nakeya S. Fincher Investigator

cc: Mr. Tim Smith, President Mr. Bill Ashley, Vice President