

U.S. Department of Labor
Cleveland District Office

Employment Standards Administration
Office of Labor-Management Standards
Cleveland District Office
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SEP 26 2005

Jim Lowe, President
Communications Workers, AFL-CIO
LU 84-708
30 East Cook Road
Mansfield, Ohio 44907

Re: 2

Dear Mr. Lowe:

This office has recently completed an audit of CWA Local Union 84-708 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, as Amended (LMRDA). As discussed during the exit interview with you on September 19, 2005, 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.

Title II of the LMRDA establishes certain reporting and record keeping requirements. Section 206 requires, among other things, that adequate records be maintained for at least five years by which each receipt and disbursement of funds, as well as all account balances can be verified, explained, and clarified. As a general rule, all records used or received in the course of union business must be retained. The CAP disclosed that adequate documentation was not retained for the month of July 2004, specifically 5 deposit records for dues check-off and rent payments.

During the audit, a cancelled check containing the signature of one officer was discovered. Your union's bylaws require that all checks be signed by two officers. The countersignature requirement is an effective internal control of union funds. Its purpose is to attest to the authenticity of a completed document already signed. You mentioned that this was most likely an oversight or human error on your part and agreed to obtain 2 signatures on all checks in the future.

As agreed, provided that Local 84-708 maintains adequate documentation in the future, no additional enforcement action will be taken regarding this violation. I want to extend my personal appreciation for your and your entire staff's cooperation and courtesy during this compliance audit. If we can be of any assistance in the future, please do not hesitate to call.

Sincerely,

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