

U.S. Department of Labor

Employment Standards Administration
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July 25, 2008

Ms. Virginia Anderson-Dunbar
Secretary-Treasurer
Communications Workers AFL-CIO
Local 6320
2258 Grissom Drive
St. Louis, MO 63146

LM File Number 026-643
Case Number: [REDACTED]

Dear Ms. Anderson-Dunbar:

This office has recently completed an audit of Communications Workers 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 July 21, 2008, 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.

Recordkeeping Violations

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records 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, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers, and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity

of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing the additional information. For money it receives, the labor organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of Local 6320's records revealed the following recordkeeping violations:

General Reimbursed and Credit Card Expenses

A sample review of Local 6320's credit card back-up records show the local did not retain adequate documentation for reimbursed expenses and credit card expenses incurred by [REDACTED] and [REDACTED] totaling at least \$479.98. For example, a receipt could not be located for charges made by Compton at Lions Choice Restaurant on February 8, 2007 for \$10.52 and at Ponderosa Restaurant on April 23, 2007 for \$13.74. There was no back-up documentation located for a charge made by Di Silvester on March 25, 2007 at the Washington Court Hotel for \$455.72.

As previously noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

I want to extend my personal appreciation to Communications Workers for the cooperation and courtesy extended during this compliance audit. I 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,

[REDACTED]

Investigator

cc: Kevin Kujawa, President