U.S. Department of Labor

Employment Standards Administration Office of Labor-Management Standards Dallas District Office 525 S. Griffin St Room 300 Dallas, TX 75202 (972) 850-2500 / FAX: (972) 850-2501



February 17, 2005

Ms. Susan Head PO Box 280 Temple, TX 76503

Re:

2

Dear Ms. Head:

This office has recently completed an audit of Communications Workers Local 6206 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 and Brian Goonan on February 11, 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.

The CAP disclosed a violation of LMRDA section 201(b), because the Labor Organization Annual Report (Form LM-3) filed by Local 6206 for fiscal year ending September 30, 2004 was deficient in the following area:

The cash disbursements did not reconcile. The cash disbursements did not include per capita tax and office and administrative expenses.

It will be necessary for Local 6206 to file an amended LM-3 report for 2004 to correct the deficient item discussed above. The necessary reporting forms and instructions can be found on the OLMS website. You may also use the new electronic forms software available from OLMS to complete the amended reports. One copy of the amended report should be submitted to this office at the above address as soon as possible, but no later than 03/03/05. Before mailing, review the reports thoroughly to be sure they are complete, accurate, and signed properly with original signatures.

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. This includes, in the case of disbursements, not only the retention of original bills, invoices, receipts, and vouchers, but also adequate additional documentation, if necessary, showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipients of the goods or services.

The following record keeping violations were revealed during the audit of Local 6206's 2004 records:

Some checks which were voided and not issued were not retained.

As agreed, provided that Local 6206 maintains adequate documentation for its disbursements in the future, no additional enforcement action will be taken regarding this violation.

I strongly recommend that you make sure that this letter and the compliance assistance materials that were provided to you are passed on to yours and Mr. Goonan's successors at whatever time you may leave office.

I want to extend my personal appreciation for your cooperation and courtesy during this compliance audit. If we can be of any assistance in the future, please do not hesitate to call.

2 ...

Sincerely,

James Devine
District Director