



May 17, 2010

Mr. Eric Willson, Treasurer
CWA LU 7810
PO Box 865
Olympia, WA 98507-0865

Case Number: [REDACTED]
LM Number: 035223

Dear Mr. Willson:

This office has recently completed an audit of CWA LU 7810 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 Phyllis Dionne on May 14, 2010, 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 Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-3) filed by Local 7810 for the fiscal year ended September 30, 2009, was deficient in the following areas:

1. Disbursements to Officers (LM-3)

Local 7810 did not include some reimbursements to officers in Item 24, Column E (All Officers and Disbursements to Officers) It appears the union erroneously reported these payments in either Item 24, Column D or in Item 54.

Local 7810 did not report the names of some officers and the total amounts of payments to them or on their behalf in Item 24 (All Officers and Disbursements to Officers). The union must report in Item 24 all persons who held office during the year, regardless of whether they received any payments from the union.

The union must report most direct disbursements to Local 7810 officers and some indirect disbursements made on behalf of its officers in Item 24. A "direct disbursement" to an officer is a payment made to an officer in the form of cash, property, goods, services, or other things of value. See the instructions for Item 24 for a discussion of certain direct disbursements to officers that do not have to be reported in Item 24. An "indirect disbursement" to an officer is

a payment to another party (including a credit card company) for cash, property, goods, services, or other things of value received by or on behalf of an officer. However, indirect disbursements for temporary lodging (such as a union check issued to a hotel) or for transportation by a public carrier (such as an airline) for an officer traveling on union business should be reported in Item 48 (Office and Administrative Expense).

2. Investments Reported As Cash

Local 7810 improperly included the value of investments in Statement A (Assets and Liabilities) as cash. For LM reporting purposes, OLMS does not consider investments as cash and should be reported as an Investment in Item 28.

3. Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. Local 7810 amended its constitution and bylaws in 2000, but did not file a copy with its LM report for that year.

Local 7810 has now filed a copy of its bylaws.

Local 7810 must file an amended Form LM-3 for the fiscal year ended September 30, 2009, to correct the deficient items discussed above. I provided you with instructions, and advised you that the reporting forms and instructions are also available on the OLMS website (www.olms.dol.gov). The amended Form LM-3 should be submitted to this office at the above address as soon as possible, but not later than May 31, 2010. Before filing, review the report thoroughly to be sure it is complete, accurate, and signed properly with original signatures.

I want to extend my personal appreciation to CWA LU 7810 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,



Investigator