



January 24, 2023

Mr. Carl Jenkins, President  
National Association of Letter Carriers Branch 2730  
P.O. Box 820442  
New Orleans, LA 70182

Case Number: 420-6023506( )  
LM Number: 081793

Dear Mr. Jenkins:

This office has recently completed an audit of the National Association of Letter Carriers (NALC) Branch 2730 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 December 1, 2022, 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 NALC Branch 2730's 2021 records revealed the following recordkeeping violations:

1. Failure to Record Disbursements

NALC Branch 2730 did not maintain adequate documentation in its disbursement records. Official Warrants (voucher) were utilized but lacked specificity. Carbon copies of checks were illegible.

NALC Branch 2730's official warrants do not reflect the specific time frame in which the voucher is disbursing officer funds. Union disbursing documents must show dates and period covered. Failure to record the dates covered in each warrant could result in irreconcilable outcomes and the union reporting inadequate payments to officers for the year.

## 2. Information not Recorded in Meeting Minutes

During the audit, Recording Secretary [REDACTED] advised OLMS that authorizations and the signing of official warrants were performed at meetings. Membership meetings were not held due to quorums not being met. NALC Branch 2730 maintained no meeting minutes. Minutes of all membership or executive board meetings must report any disbursement authorizations made at those meetings.

## 3. Lack of Salary Authorization

NALC Branch 2730 did not maintain records to verify that salaries reported in Item 24 (All Officer and Disbursements to Officers) of the LM-3 was the authorized amount and therefore was correctly reported. The union must keep a detailed record, such a specific documentation on official warrants or meeting minutes, to show the current salary authorized by the entity or individual in the union.

### 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 LM-3 filed by NALC Branch 2730 for the fiscal year ended December 31, 2021, was deficient in the following areas:

#### Disbursement to Officers (LM-3)

Due to the lack of documentation, it is unclear how many payments union officers received within the year, as represented on the LM-3. NALC Branch 2730 did not provide information supporting the amount listed in Item 24 with union records.

The National Association of Letter Carriers Branch 2730 must file an amended Form LM-3 for the fiscal year ended December 31, 2021, to correct the deficient items discussed above. The report must be filed electronically using the Electronic Forms System (EFS) available at the OLMS website at [www.olms.dol.gov](http://www.olms.dol.gov). The amended Form LM-3 must be filed no later than January 31, 2023. Before filing, review the report thoroughly to be sure it is complete and accurate.

I want to extend my personal appreciation to NALC Branch 2730 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,

[REDACTED]

Investigator

cc: Mr. Donald Charles, Treasurer  
[REDACTED] Recording Secretary