

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
Dallas District Office  
525 Griffin Street  
Room 300  
Dallas, TX 75202  
(972)850-2500 Fax: (972)850-2501



May 5,2008

Ms. Sharon Hubble, Treasurer  
Letter Carriers, NATL, ASN, AFL-CIO  
Branch 4240  
1515 Grady Lane  
Cedar Hill, Texas 75104-4227

LM File Number 090-694

Case Number: [REDACTED]

Dear Ms. Hubble:

This office has recently completed an audit of Letter Carriers Branch 4240 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, Ray Coffey, Linda Christopherson and Larry Jones on March 24,2008, 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

Ms. Sharon Hubble  
May 5, 2008  
Page 2 of 2

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 Branch 4240's 2007 records revealed the following recordkeeping violations:

Failure to Accurately Record All Receipts

Branch 4240 failed to maintain adequate records to verify, explain or clarify accuracy or completeness of reports required to be filed with the Secretary of Labor. For example, there were at least ten different occasions wherein Branch 4240 failed to properly and/or accurately record dividend income deposits and/or transfers of funds. In addition, Branch 4240 failed to make an adjusting entry in its books resulting from a missapplication of a deposit caused by the credit union. Union receipts records must include an adequate identification of all money the union receives. The records should show the date and amount received, and the source of the money.

Based on your assurance that Branch 4240 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violation.

I want to extend my personal appreciation to Letter Carriers Branch 4240 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

cc: Ray Coffey, President