

U.S. Department of Labor  
Office of Labor-Management Standards  
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Atlanta Federal Center  
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June 28, 2010

Mr. Franklin Cockfield, President  
Steelworkers Local 1879  
2705 Secretarial Drive  
Florence, SC 29505

Case Number |||||  
LM Number 061791

Dear Mr. Cockfield:

This office has recently completed an audit of Steelworkers Local 1879 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 Financial Secretary/Treasurer, Richard Johnson, on June 17, 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.

#### Record Keeping Violation

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that adequate records be maintained for at least 5 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 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 note can be written on it providing the additional information. An exception may be made only in those cases where 1) other equally descriptive documentation has been maintained, and 2) there is evidence of actual oversight and control over disbursements.

In the case of receipts, the date, amount, purpose, and source of all money received by the union must be recorded in at least one union record. Bank records must also be retained for all accounts.

The audit of Local 1879's 2009 records revealed the following recordkeeping violation:

1. Failure to maintain records for 5 years.

During the audit, it was explained that union records from 2007 through 2008 were destroyed due to a garage fire at the home Mr. Johnson. However, it is still the responsibility of the union to maintain a backup system to secure records to meet the requirement of Title II of the LMRDA, Section 206.

As agreed, provided that Local 1879 maintain adequate documentation as discussed above in the future, no additional enforcement action will be taken regarding this violation.

I want to extend my personal appreciation to Steelworkers Local 1879 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: Mr. Scott Ghent, Steelworker Int'l Auditor  
Mr. Richard Johnson. Financial Secretary/Treasurer