U.S. Department of Labor

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June 13, 2022

Mr. Eddie Williams, President
Graphic Communications Workers Union District IBT
Southeastern Printing Specialist District Council 7S
715 Veterans Memorial Highway
Mableton, GA 30128

Case Number: 410-6022868([redacted])
LM Number: 063621

Dear Mr. Williams:

This office has recently completed an audit of Graphic Communications Workers (IBT) Southeastern Printing Specialist District Council 7S 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 Ralph Meers, Secretary-Treasurer and Office Administrator [redacted] on December 10, 2021, 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 District Council 7S 2020 records revealed the following recordkeeping violations:

1. District Council 7-S did not maintain records to verify that the salaries reported in Item 24 (All Officer and Disbursements to Officers) of the LM-3 was the authorized amount and therefore was correctly reported. Local 527S keeps meeting minutes that do show the current

salary of District Council President Williams is authorized by the Local 527S Executive Board. Local 527S is the only Local remaining under the jurisdiction of District Council 7S but maintained no records authorizing the executive board of Local 527S to establish salaries for the District Council. Union Records show a clear past practice of paying salaries to officers, this past practice should be put in writing in either the form of meeting minutes or revisions to the bylaws of the district council or local.

2. District Officers agreed to either amend the bylaws of the District Council or those of the Local to address this issue of authorization.

Based on your assurance that District Council 7S will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

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 District Council 7S for the fiscal year ended December 31, 2020, was deficient in that it failed to answer yes to item 17.

1. During fiscal year ending December 31, 2020, President Eddie Williams received more then $10,000 in expense reimbursements from the International Brotherhood of Teamsters. He was reimbursed for legitimate expenses incurred while conducting organizing activities. These expenses were properly reported on the LM-3 submitted by Local 527S, but not properly reported on the LM-3 report submitted by District Council 7S.

2. The instructions for completing the LM-3 clearly state the following Answer Item 17 “Yes” if any employee of your organization received more than $10,000 in gross salaries, allowances, and other direct and indirect disbursements during the reporting period (direct and indirect disbursements are defined in the instructions for Item 24[All Officers and Disbursements to Officers]). In computing the total, add together all disbursements made to each employee by your organization (including any subsidiary organization) and any affiliates. (“Affiliates” means labor organizations chartered by the same parent body, governed by the same constitution and bylaws, or having the relationship of parent and subordinate.)

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. District Council 7S amended its constitution and bylaws in 2020 but did not file a copy with its LM report for that year.

I am not requiring that District Council 7S to file an amended LM report for 2020 to correct the deficient items, but District Council 7S has agreed to properly report the deficient items on all future reports it files with OLMS.

Other Violation

The audit revealed a violation of LMRDA Section 401 (Elections). Elections must be held as often as required by the union's constitution and bylaws, but at least every three years for local unions. District Council 7S held its last regularly scheduled election of union officers on December 2018. President Williams and Secretary-Treasurer Ralph Meers advised an election has not been held because COVID-19. District Council 7S must take reasonable steps to conduct its regular election as soon as is practicable.

I want to extend my personal appreciation to Graphic Communications Workers Union IBT Southeastern Printing Specialist District Council 7S 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