



October 15, 2020

Mr. Rodney Bryant, President
Communications Workers AFL-CIO Local 14620
[REDACTED]

Case Number: 510-6019750 [REDACTED]
LM Number: 038768

Dear Mr. Bryant:

This office has recently completed an audit of Communications Workers AFL-CIO Local 14620 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 Secretary/Treasurer Tanya Greer-Powers on October 13, 2020, 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.

1) General Reimbursed Expenses

Local 14620 did not retain adequate documentation for reimbursed mobile phone and internet expenses incurred by Union officers totaling at least \$3,341.90. For example, in all instances you and Secretary/Treasurer Tanya Greer-Powers only provided partial monthly mobile phone provider bills and internet expenses, and on nine occasions you did not provide any bills for phone and internet expenses.

In addition, Local 14620 did not retain receipts for other expenses totaling at least \$1,834.65. For example, you did not retain receipts for the following expenses incurred: hotel expenses totaling at least \$950.26; airfare totaling at least \$490; rental car totaling at least \$162.42; office supplies totaling at least \$142.97 and gas totaling at least \$89.

As noted above, Labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your Union, who are required to sign your union's LM report, are responsible for properly maintaining Union records.

2) Lost Wages

Local 14620 did not retain adequate documentation for lost wage reimbursement payments to Union officers and members totaling at least \$9,514.28. The Union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS audit found that Local 14620 does not have a voucher system in place to identify and support each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted.

During the exit interview, I provided a compliance tip sheet, *Union Lost Time Payments*, that contained a sample of an expense voucher Local 14620 may use to satisfy this requirement. The sample identifies the type of information and documentation that the Local must maintain for lost wages and other officer expenses.

3) Per-Diem

Local 14620 did not retain adequate documentation for per-diem payments to Union officers and members totaling at least \$700. For example, Union officers were paid per-diem in the amount of \$50 when traveling for official Union business; however, on 14 occasions, the dates the officers traveled were not recorded on the individual vouchers submitted for payment.

4) Receipt Dates not Recorded

Entries in Local 14620's General Ledger reflect the date the Union deposited money, but not the date money was received. Union receipts records must show the date of receipt. In some instances, deposits were not recorded in the General Ledger. For example, on five occasions, Local 14620 did not record receipts in the General Ledger totaling at least \$10,772.16. The date of receipt is required to verify, explain, or clarify amounts required to be reported in Statement B (Receipts and Disbursements) of the LM-3. The LM-3 instructions for Statement B state that the labor organization must record receipts when it actually receives money and disbursements when it actually pays out money. Failure to record the date money was received could result in the union reporting some receipts for a different year than when it actually received them.

Based on your assurance that Local 14620 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Reporting Violations

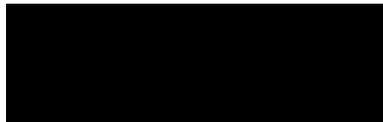
Failure to File Bylaws

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 14620 amended its constitution and bylaws in 2015, but did not file a copy with its LM report for that year.

Resolution: Local 14620 has now filed a copy of its constitution and bylaws.

I want to extend my personal appreciation to Communications Workers AFL-CIO Local 14620 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: Ms. Tanya Greer-Powers, Secretary/Treasurer