

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
New Haven Resident Investigative Office
150 Court Street
Room 209
New Haven, CT 06510
(203)773-2130 Fax: (203)773-2333



September 27, 2007

Mr. Paul Kurbikoff, President
IUE CWA
Local 81203
1285 Boston Ave.
Bridgeport, CT 06610

Re: Case Number: [REDACTED]

Dear Mr. Kurbikoff:

This office has recently completed an audit of Communication Workers Local 81203 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 September 26, 2007, 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 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 81203's 2006 records revealed the following recordkeeping violation:

Officer and Employee Expenses

Local 81203 failed to maintain adequate documentation for meal expenses charged to union credit cards. The date, amount, and business purpose of every expense must be recorded on at least one union record and should include the names of individuals present for meal expenses. This includes all meal expenses paid during the Executive Board and membership meetings.

As agreed, provided that Local 81203 maintains adequate documentation as discussed above in the future, no additional enforcement action will be taken regarding this violation.

Reporting Violations

The CAP 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 Local 81203 for fiscal year ending September 30, 2006, was deficient in that:

The figures reported in Cash Disbursements (Items 45 through 55) are incorrect. The total disbursements for fiscal year ending September 30, 2006 should have totaled \$13,191 instead of the \$7,644 which was reported.

Local 81203 must file an amended Form LM-3 for fiscal year ending September 30, 2006, to correct the deficient items discussed above. I provided you with a blank form and instructions, and discussed with you the availability of the reporting forms and instructions on the OLMS website (www.olms.dol.gov). The amended Form LM-3

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should be submitted to this office at the above address as soon as possible, but not later than October 26, 2006. Before filing, review the report thoroughly to be sure it is complete, accurate, and signed properly with original signatures.

I want to extend my personal appreciation to Communication Workers Local 81203 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: Pat Minto