

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
New York District Office
201 Varick Street
Room 878
New York, NY 10014
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August 31, 2009

Ms. Paula Belluardo, Secretary-Treasurer
Communications Workers AFL-CIO
Local 1120
157 Van Wagner Rd.
Poughkeepsie, NY 12603

Re: Case Number: [REDACTED]

Dear Ms. Belluardo:

This office has recently completed an audit of CWA Local 1120 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 Michael Salvia and yourself on August 28, 2009, 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.

The CAP 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 constitution or bylaw changes are made. Local 1120 amended its constitution and bylaws in 2002, but a copy was not filed with its LM report for that year. A copy of Local 1120's revised constitution and bylaws has now been filed.

I am not requiring that Local 1120 file an amended LM report for 2002 to correct the deficient item, but as agreed, Local 1120 will properly report the deficient item on all future reports filed with this agency (if applicable).

The CAP disclosed the following other violation(s):

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The audit revealed a violation of LMRDA Section 502 (Bonding), which requires that union officers and employees be bonded for no less than 10 percent of the total funds handled by those individuals or their predecessors during the preceding fiscal year. Local 1120's officers and employees are currently bonded for \$75,000, but they must be bonded for at least \$202,000.

Local 1120 should obtain adequate bonding coverage for its officers and employees immediately. Please provide proof of bonding coverage to this office as soon as adequate coverage has been obtained, but not later than September 18, 2009.

I want to extend my personal appreciation to CWA Local 1120 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: Michael Salvia, President