



August 26, 2013

Mr. Tim Bright, President  
Communications Workers AFL-CIO, Local 3972  
PO Box 792  
Dothan, AL 36302

Case Number: 430-10506 [REDACTED]  
LM Number: 024153

Dear Mr. Bright:

This office has recently completed an audit of Communications Workers Local 3950, under the Compliance Audit Program (CAP) to determine the 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, Former President [REDACTED], and Secretary-Treasurer Dwight Griffin on August 20, 2013, 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 Local 3950's 2012 records revealed the following recordkeeping violations:

1. Failure to Record Receipts

Local 3950 did not record in its receipts records some employer dues check off checks and some checks received from banks for interest earned on their checking account totaling at least \$10,309.00. For example, the union was on employer check off and did not record the dues receipt payment to the union for any month during the October 1, 2011-September 30, 2012 period. Union receipts records must include an adequate identification of all money the union receives. The records should show the date and amount received, and the source of the money.

2. General Disbursements

Local 3950 did not retain adequate documentation for disbursements totaling at least \$100.00. For example, check number [REDACTED] in the amount of \$100.00 dated July 25, 2012 for annual dues to the Retired Council did not have an invoice, bill, or receipt.

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.

Based on your assurance that Communications Workers Local 3950, will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

I want to extend my personal appreciation to Communications Workers Local 3950, 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

cc: Mr. Dwight Griffin, Secretary Treasurer