



September 30, 2016

Ms. Debra L. Chadbourne, Secretary/Treasurer  
Government Employees, AFGE, AFL-CIO  
Local 2612  
26 Electronics Parkway  
Rome, NY 13441

Case Number: 110-6008459  
LM Number: 501071

Dear Ms. Chadbourne:

This office has recently completed an audit of Local 2612 under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Civil Service Reform Act of 1978 (CSRA), 5 U.S.C. 7120, and the Department's regulations, 29 CFR 458. As discussed during the exit interview with you on September 1, 2016, 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.

#### Reporting Violations

Pursuant to 29 C.F.R., Section 458.3, the reporting requirement under 29 C.F.R. Section 403.2 (see Section 201(b) of the Labor-Management Reporting and Disclosure Act (LMRDA)) is made applicable to labor organizations subject to the requirements of the CSRA. This provision requires labor organizations to file annual financial reports that accurately disclose their financial condition and operations. The audit disclosed a violation of this requirement. The Labor Organization Annual Report Form LM-3 filed by Local 2612 for the fiscal year ended March 31, 2016, was deficient in the following areas:

##### 1. Mailing Address

The union's mailing address is listed as a post office box, and Local 2612 failed to answer Informational Item 9. Records required to be kept by labor organizations cannot be maintained at a post office box. Therefore, if an organization's records are not kept at its mailing address, Item 9 should be answered "No" and an explanation with an address should be provided in Item 56 (Additional Information).

2. Outstanding Checks

Local 2612 improperly reported \$300 in outstanding checks in Statement A, Liabilities, Item 32 Accounts Payable. Checks that remain outstanding at the end of a reporting period are considered disbursements from the union books and should be reported under the appropriate category in Cash Disbursements Items 45 through 54.

The receipts and disbursements, as well as checking account balances reported, should be obtained from your organization's books as reconciled with the balances shown on bank statements.

I am not requiring that Local 2612 file an amended LM report for 2016 to correct the deficient items, but Local 2612 has agreed to properly report the deficient items on all future reports it files with OLMS.

I want to extend my personal appreciation to Local 2612 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. Amanda E. Neff, President