



November 21, 2019

Ms. Jennifer Godwin, Treasurer  
Steelworkers Local 09-975-L, AFL-CIO  
████████████████████  
Ripley, MS 38663

Case Number: 420-6015746 ██████████  
LM Number: 505034

Dear Ms. Godwin:

This office has recently completed an audit of Steelworkers Local 09-975-L, 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 President Strong on November 14, 2019, 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.

Record Keeping 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 09-975-L's 2018 records revealed the following recordkeeping violations:

1. Lack of Salary Authorization  
Local 09-975-L did not maintain records to verify that the salaries reported on the LM-4 report. The union must keep a record, such as meeting minutes, to show the current salary authorized by the entity or individual in the union with the authority to establish salaries.

Based on your assurance that Local 09-975-L will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

2. General Disbursements

Local 09-975-L did not maintain adequate records for disbursements for USW Local 09-975-L's annual holiday gift card giveaway of \$2,300. Though the local did notate a vote within the meeting minutes authorizing the purchase of the gift cards, along with documenting the withdrawal in the local's ledger, the local failed to adequately document the disbursements of the gift cards through some form of internalized document which would list the total amount of gift cards purchased and some form of signature for members collecting their gift card. Moving forward, the local should adequately produce a sign-in sheet listing the number of gift cards purchased along with providing an area for members to sign, proving the gift cards were disbursed. The union must maintain sufficient records to determine if such disbursements are for union business purposes and to sufficiently fulfill the recordkeeping requirement of LMRDA Section 206.

As previously 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 Local 09-975-L 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 Steelworkers Local 09-975-L, 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: Mr. Marshall Strong, President