



January 26, 2012

[REDACTED]

[REDACTED]

[REDACTED]

Dear [REDACTED]:

This Statement of Reasons is in response to your complaint filed with the Department of Labor on September 8, 2011, alleging that violations of Title IV of the Labor-Management Reporting and Disclosure Act (LMRDA) occurred in connection with the election of union officers conducted by the Communications Workers of America (CWA), on July 14, 2011.

Specially, you alleged that the July 2011 election of CWA officers by delegates from subordinate locals was not conducted in accordance with the LMRDA because delegates representing CWA Local 1033 participated in the election but had not been properly elected. The Department's investigation disclosed that Local 1033 did not send any delegates to the 2011 convention of CWA, despite its right to do so. Thus, no CWA Local 1033 delegates participated in the 2011 election. Moreover, the investigation disclosed that, during the CWA 2011 election, the only contested race was for the office of secretary-treasurer. The incumbent candidate received 276,769 delegate votes and the insurgent candidate received 94,733 delegate votes, for a margin of 182,036 votes. The delegates representing CWA Local 1033 would have been entitled to cast 4,705. The 182,036 vote margin for the office of secretary-treasurer far exceeded the 4,705 votes the CWA Local 1033 delegates were entitled to cast. Thus, the CWA Local

1033 delegate votes could not have affected the outcome of the election of the CWA secretary-treasurer.

For the reason set forth above, there was no violation of the Act that may have affected the outcome of the election, and I have closed the file on this matter.

Sincerely,

Patricia Fox  
Chief, Division of Enforcement

cc: Larry Cohen, President  
Communications Workers of America  
501 Third Street, N.W.  
Washington, DC 20001

Christopher B. Wilkinson  
Associate Solicitor for Civil Rights and Labor-Management