

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Cleveland District Office
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July 10, 2006

Donald Clarkson
President
Electrical Workers IBEW AFL-CIO
Local Union 2020
610 Lancaster Avenue
Reynoldsburg, OH 43068-1127

Re: Case Number: XXXXXXXXXX

Dear Mr. Clarkson:

This office has recently completed an audit of IBEW Local 2020 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 Donald Clarkson, Susan Downs and Teresa Dittman, CPA on June 14, 2006, 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 in violation of Section 206 of the LMRDA, LU 2020 failed to maintain receipts for disbursements such as postage, office supplies and invoices for professional fees to individuals and organizations which were direct-paid by the union. The date, amount, and business purpose of every expense must be recorded on at least one union record such as the union's *Salary, Lost Time and Expense Voucher*. With respect to documentation retained in support of specific disbursements, the record retention requirement includes not only the retention of original bills, invoices, receipts, and vouchers, but also additional documentation, if necessary, showing the nature of the union business requiring the disbursement, the goods or services received, and all the recipients of the goods or services. In most instances, this documentation requirement can be most easily satisfied with a sufficiently descriptive receipt. If a receipt is not sufficiently descriptive, a note can be written on it providing the additional information. Such records are required by law to be maintained for a period of five years after filing of the LM Report based on the information it contains. As agreed, provided that LU

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2020 maintains adequate documentation for its disbursements in the future, no additional enforcement action will be taken regarding this violation.

The compliance audit also disclosed a violation of LMRDA Section 201(a) which requires that unions submit a copy of their current constitution and bylaws with its LM report when bylaw changes are made. LU 2020 amended its bylaws in 2005, but a copy of the bylaws was not filed with the union's LM-3 report for that year. A copy of LU 2020's bylaws have now been filed

Finally, in violation of LMRDA Section 201(b) LU 2020 filed a deficient LM-3 Report for its fiscal year ended December 31, 2005. Item 24 must include all direct and indirect payments to officers. It was noted that indirect disbursements through credit cards, postage and office supplies were not reported as payments to officers. As discussed during the exit interview, LU 2020 must file an amended LM-3 Report for its fiscal year ended December 31, 2005, to correct the cited deficiency. After the exit interview, we have received an amended LM-3 report; no further action is required by the Local.

I want to extend my personal appreciation to IBEW Local 2020 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,

Fred Vaudrin
District Director