



February 28, 2024

Mr. Donald R. McConnell, President
Communications Workers AFL-CIO Local 14827
98 Vanadium RD
Building D, Suite 4208
Bridgeville, PA 15017-3061

Case Number: 140-6027418()
LM Number: 003000

Dear Mr. McConnell:

This office has recently completed an audit of Communications Workers AFL-CIO Local 14827 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 on February 27, 2024, 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 14827's 2023 records revealed the following recordkeeping violations:

1. Failure to Maintain Supporting Documentation for Disbursements and Credit Card Expenses

Local 14827 did not retain adequate documentation for disbursements and credit card

expenses incurred by you and Office Manager Cassandra Anania totaling at least \$5,013.65. For example, on July 11, 2023, the union made a purchase totaling \$198.75 at Homes to Suites by Hilton for a union related conference in St. Louis, Missouri. Credit Card statements alone are not sufficient to fulfil the recordkeeping requirement. In addition, Local 14827 failed to maintain supporting documentation for disbursements made from the local's general fund for the purpose of the monthly reoccurring bills, utilities, insurance payments, and accounting/tax services.

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.

2. Lack of Salary Authorization

Local 14827 did not maintain records to verify that the salary for Office Manager Cassandra Anania reported in Schedules 11 (All Officers and Disbursements to Officers) and 12 (Disbursements to Employees) of the LM-2 was the authorized amount and therefore was correctly reported. 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 14827 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Other Issue

Use of Signature Stamp

During the audit, you advised that it is Local 14827's practice for the union to utilize signature stamps and electronically stored signatures on union checks. Article IX of Local 14827's bylaws requires that checks be signed by the president and treasurer. The two-signature requirement is an effective internal control of union funds. Its purpose is to attest to the authenticity of a completed document already signed. However, the use of a signature stamp and electronic signatures does not attest to the authenticity of the completed check and negates the purpose of the two-signature requirement. OLMS recommends that Local 14827 review these procedures to improve internal control of union funds.

I want to extend my personal appreciation to Communications Workers AFL-CIO Local 14827 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