

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Boston District Office
Room E-365
John F. Kennedy Federal Building
Boston, MA 02203
(617) 624-6690 / FAX: (617) 624-6606



January 27, 2005

Robert Losi, President
LIUNA Local 301
971 Worcester Road
Natick, MA 01760

Re: [REDACTED]

Dear Mr. Losi:

This office has recently completed an audit of LIUNA Local 301 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 Tim Dwyer, David West, and yourself on January 27, 2005, 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.

Title II of the LMRDA establishes certain reporting and record keeping requirements. Section 206 requires, among other things, that adequate records be maintained 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, all records used or received in the course of union business must be retained. This includes, in the case of disbursements, not only the retention of original bills, invoices, receipts, and vouchers, but also adequate additional documentation, if necessary, showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipients of the goods or services.

The following record keeping violations were revealed during the audit of Local 301's 2001 records:

Local 301 failed to keep all documentation for expenses charged to the union's credit cards. It is necessary to keep all receipts, vouchers, and backup documentation for these charges along with the credit card statement in order to verify the purpose of the expense. We also strongly recommend that documentation be retained for all travel relating to convention or meeting calls. Maintaining these convention call notices will help to verify and backup any travel or expenses pertaining to these specific trips and disclose their purpose.

As agreed, provided that Local 301 maintains adequate documentation for its disbursements in the future, no additional enforcement action will be taken regarding this violation.

I want to extend my personal appreciation for your and your entire staff's cooperation and courtesy during this compliance audit. If we can be of any assistance in the future, please do not hesitate to call.

Sincerely,

F(c)

F(c)
Investigator

cc:Tim Dwyer-Treasurer