

U.S. Department of Labor  
New York District Office

Office of Labor-Management Standards  
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December 16, 2005

Mr. Frank Heffler  
President  
Treasury Employees, Chapter 47  
290 Broadway - 5<sup>th</sup> Floor  
New York, NY 10004

Re:

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Mr. Frank Heffler:

This Office has recently completed an audit of Treasury Employees, Chapter 47 under the Compliance Audit Program (CAP) to determine compliance with provisions of the Labor-Management Reporting and Disclosure Act of 1959, as amended (LMRDA). As discussed during the exit interview with you on November 28, 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.

The CAP disclosed that union officers failed to retain adequate documentation for reimbursed expenses, and for expenses charged to the union's credit cards. The date, amount, and business purpose of every expense must be recorded on at least one union record. In addition, the names of individuals present for meal expenses paid for by the union and the locations (names of restaurants) where meal expenses were incurred must also be recorded.

With respect to documentation retained in support of specific disbursements (including those in payment of credit card charges), 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. An exception may be made only in those cases where 1) other equally descriptive documentation has been maintained, and 2) there is evidence of actual oversight and control over disbursements.

As you were advised, a CAP case is considered by this office to be a confidential proceeding in which records and documents provided are handled in a strictly confidential manner to the extent permitted by law. In conducting our review of your organization, we recognize the sensitive

nature of all materials and records compiled during the audit, as well as related discussions with union officials. Accordingly, unless otherwise mandated by law, all findings and results of the CAP are conveyed only to the proper officials of your organization, to appropriate individuals within this Department, and, if necessary, to other law enforcement agencies.

I want to extend my personal appreciation for your and for Mr. Schechter'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, \_\_\_\_\_

FCC

cc: \_\_\_\_\_

cc: Mr. Donald Schechter, Treasurer