

U.S. Department of Labor

Office of Labor - Management Standards
Philadelphia District Office
Suite 760 West
The Curtis Center
170 S. Independence Mall West
Philadelphia, PA 19106-3310



April 1, 2005

Michael Platt, Organizer
Carpenters AFL-CIO
Local 191
524 S. 22nd St
Harrisburg, PA. 17104

Re:

2

LM-031-446

Dear Mr. Platt:

This office has recently completed an audit of Carpenters Local 191 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, as Amended (LMRDA). As discussed during the exit interview with you on March 29, 2005, the following problem was disclosed during the CAP.

Record Keeping Violations

Title II of the LMRDA establishes certain record keeping and reporting 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 violation was revealed during the audit:

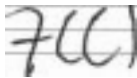
1. Failure to Maintain Adequate Supporting Documentation

LMRDA Section 206 requires that all records necessary to verify, explain, or clarify the annual financial report must be retained and shall include, but not be limited to, vouchers, worksheets, receipts, and applicable resolutions. All records identified above must be maintained by local 191 for a period of at least five years following the date the financial report is filed. The CAP identified instances when local 191 did not always maintain itemized receipts for the required five years. Local 191 officials were informed at the exit interview that back-up documentation, such as itemized receipts for maintenance charges, must be maintained and retained for all disbursements regardless of amount.

Enforcement action will not be taken regarding this violation. I strongly recommend that you make sure that this letter and the compliance assistance materials that were provided to you are passed on to your successor at whatever time you may leave office.

I want to thank you for your cooperation and courtesy during this compliance audit. If we can be of any assistance in the future, please do not hesitate to contact me or any other representative of our office.

Sincerely,

A handwritten signature in black ink, appearing to be "FCC".

Investigator