

U.S. Department of Labor

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



April 8, 2005

Joseph Socha  
Treasurer  
APWU Local 4553  
326 Plantation Street  
Worcester, MA 01604

Re: 2

Dear Mr. Socha:

This office has recently completed an audit of APWU Local 4553 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 and President John Flattery on March 21, 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 CAP disclosed the following record keeping deficiencies:

Union officers failed to retain sufficient backup documentation for reimbursed expenses. Examples of such missing documentation include vendor and hotel invoices. As agreed, provided that the Local 4553 maintains adequate documentation for its disbursements in the future, no additional enforcement action will be taken regarding this violation.

Investigation also disclosed that Clerk Craft Director Joseph Azzarone and Vice-President Mary Toohil incurred extraneous travel expenses during the clerk craft conference in April 2002, which were originally paid for by the local. Azzarone and Toohil were informed of the matter and voluntarily repaid the local a total amount of \$225.51 in February 2005. 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,

700

Investigator