

U.S. Department of Labor

Employment Standards Administration  
Office of Labor-Management Standards  
Detroit District Office  
211 W. Fort Street, Suite 1313  
Detroit MI 48226  
(313) 226-6200 / FAX: (313) 226-4391



November 28, 2005

Darwin Gutowski, President  
PACE Local 6-667  
516 1/2 Kosciusko Street  
Manistee MI 49660

Re: *2*

Dear Mr. Gutowski:

This office has recently completed an audit of PACE Local 6-667 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 Michael Hull and you on November 21, 2005, the following problem was disclosed during the CAP. The matter listed below is not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

LMRDA section 201(b) requires a labor union to submit a Labor Organization Annual Financial Report within 90 days after the end of its fiscal year. PACE Local 6-667 files the Form LM-3. LMRDA Section 206 requires that the labor union maintain records in sufficient detail to verify the accuracy and completeness of the required financial reports. During the audit it was disclosed that your organization regularly mails financial records, including, from time to time, the original general fund checking and savings account statements, to your International Union where further reconciliation and record keeping is performed. At times the records are not returned or are misplaced by the International Union and your local does not retain a copy or have the original records. Financial records, particularly bank statements, are essential to be able to verify and explain the required financial reports which you file and these records must be kept in the union's files. Having discussed this matter you have indicated that in the future all original records will be maintained at the local union and only copies will be forwarded to the International Union for their use, consequently, no further action in this matter is necessary at this time.

I want to extend my personal appreciation for your and Michael Hull's cooperation and courtesy during the compliance audit. If we can be of any assistance in the future, please do not hesitate to call. My office address is 800 Monroe Street NW, Suite 211, Grand Rapids, MI 49503 (tel: 616-456-2335).

Sincerely,

*F(C)*

Investigator