

**U.S. Department of Labor**

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February 18, 2009

Mr. Robert Gartner, Secretary-Treasurer  
Teamsters  
Local 6  
3650 Wisconsin Avenue  
St. Louis, Missouri 63118

LM File Number 005-879  
Case Number: [REDACTED]

Dear Mr. Gartner:

This office has recently completed an audit of Teamsters Local 6 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 on February 17, 2009, 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.

Recordkeeping Violations

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records 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, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers,

and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing the additional information. For money it receives, the labor organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of Local 6's 2007 records revealed the following recordkeeping violations:

1. Credit Card Expense

Local 6 did not retain adequate documentation for a \$341.14 credit card expense incurred on July, 17, 2007 at Myron Manufacturing.

2. Lost Wages

Local 6 did not retain adequate documentation for lost-wage reimbursement payments to union officers in at least 21 instances. The union must maintain records in support of lost-wage claims that identify each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS audit found that in at least 21 instances, Local 6 retained lost-time vouchers that did not identify the union business conducted.

Based on your assurance that Local 6 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Reporting Violation

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-2 filed by Local 6 for fiscal year ending December 31, 2007 was deficient in that in Schedules 3 and 4 of the LM-2 the local did not enter the amount of investments that were promptly reinvested in Item 14. Failure to place the reinvested amounts in Item 14 of Schedules 3

and 4 resulted in significantly inflated receipts and disbursements in Statement B - Receipts and Disbursements.

I am not requiring that Local 6 file an amended LM report for 2007 to correct the deficient items, but Local 6 has agreed to properly report the deficient items on all future reports it files with OLMS.

I want to extend my personal appreciation to Teamsters Local 6 for the cooperation and courtesy extended during this compliance audit. I recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,

A solid black rectangular redaction box covering the signature of the investigator.

Investigator