



February 17, 2016

Mr. Dana Langton, Financial Secretary  
Painters, AFL-CIO Local 1915  
34 Commercial Drive  
Brentwood, NH 03833

Case Number: 110-6005673  
LM Number: 502868

Dear Mr. Langton:

This office has recently completed an audit of Painters, AFL-CIO Local 1915 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 16, 2016, 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 1915's 2014 records revealed the following recordkeeping violations:

1. General Reimbursed Expenses

Local 1915 did not retain adequate documentation for reimbursed expenses incurred by local officers totaling at least \$1,476.38. For example, in April 2014, Local Recording Secretary David Moulton was reimbursed \$772.43 for the purchase of a union's computer, but no receipt was retained.

As noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

2. Member Gift Cards

Local 1915 failed to retain adequate documentation to support the distribution of holiday gift cards totaling \$1,000. While the local did maintain receipts for the purchase of the gift cards, it did not retain a record of which union members received the cards.

Based on your assurance that Local 1915 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

I want to extend my personal appreciation to Painters, AFL-CIO Local 1915 for the cooperation and courtesy extended during this compliance audit. I strongly 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,



Investigator

cc: Mr. Richard Smith, President