



February 25, 2015

Mr. Corrado Centrone, Treasurer
Transport Workers Union (TWU) Local 241
P.O. Box 23 Central Mail Department
116th Street and Broadway
New York, NY 10027

Case Number: 130-1315489([REDACTED])
LM Number: 045-929

Dear Mr. Centrone:

This office has recently completed an audit of TWU Local 241 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, Steven Jones, and [REDACTED] on February 24, 2015, 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.

Recordingkeeping Issues

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 241's 2013 records revealed the following recordkeeping issue:

Local 241 may not have maintained adequate backup documentation for all expenses. The union did not provide backup documentation and/or invoices and receipts for certain expenses. Some of the backup documentation and/or invoices and receipts may have been maintained apart from

the rest of the expenses documentation, and not provided to this office for the audit.

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. Based on your assurance that Local 241 will retain adequate documentation in the future, OLMS will take no enforcement action at this time.

We want to extend our appreciation to TWU Local 241 for the cooperation and courtesy extended during this compliance audit. We 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,

A handwritten signature in blue ink that reads "Andriana Vamvakas". The signature is written in a cursive, flowing style.

Andriana Vamvakas
District Director

cc: Mr. Steven C. Farkas, Esq.
Colleran, O'Hara & Mills L.L.P.