

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
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June 9, 2009

Mr. Clyde Mason, Financial Secretary
Steelworkers AFL-CIO
Local 5644
PO Box 187
Toronto, OH 43964-0187

LM File Number 014-811

Case Number: [REDACTED]

Dear Mr. Mason:

This office has recently completed an audit of Steelworkers Local 5644 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, Dennis Doyle, and Don Bunfill on May 29, 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 5644's 2008 records revealed the following recordkeeping violation:

Disposition of Property

Merchandise that was purchased by the union for the purpose of being given away to members at the union's annual Christmas party, was not properly accounted for. The purchase of these gifts was recorded, but a record was not kept on the final disposition of these items. It was not possible from the union's record to determine how many items were given away and who received them.

Based on your assurance that Local 5644 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 Steelworkers Local 5644 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: Dennis Doyle, President