

**U.S. Department of Labor**

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October 7,2008

Mr. Joe Dwyer, Secretary-Treasurer  
Teamsters Local 190  
437 Kuelman Rd.  
Billings, MT 50915

LM File Number: 017-236  
Case Number: [REDACTED]

Dear Mr. Dwyer:

This office has recently completed an audit of Teamsters Local 190 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, Darla Durham and Susan Kaiser, Bookkeeper, on July 24,2008, 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 190's 2007 records revealed the following recordkeeping violations:

#### General Receipt and Disbursement Records

Local 190 did not maintain adequate documentation for disbursements and receipts made from the petty cash fund during the audit year. As previously noted above, all labor organizations must retain original records for all disbursements and receipts. The President or Treasurer or corresponding principal officers are responsible for this.

Based on your assurance that Local 190 will maintain documentation of all petty cash account activity, OLMS will take no further enforcement action at this time regarding the above violation.

I want to extend my personal appreciation to Teamsters Local 190 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