



March 9, 2015

Joann Caporoso, International Auditor  
United Electrical, Radio and Machine Workers of  
America  
One Gateway Center, Suite 1400  
Pittsburgh, PA 15222

Case Number: 350-6002388( )  
LM Number: 063287

Dear Ms. Caporoso:

This office has recently completed an audit of Electrical Workers Local 715 under the Compliance Audit Program (CAP) to determine Local 715's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). Local 715 terminated in July 2014 and the international completed the terminal report in October 2014. Therefore, we are providing you with the finding of the audit to further assist you with other unions. 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 715's 2013 records revealed the following recordkeeping violations:

General Reimbursed Expenses

Local 715 did not retain adequate documentation for reimbursed expenses made to vendors Frontier and Artisan Floral. For example, Frontier provided the union with phone and internet services and Artisan Floral provided flowers for a loss of a member or member's family member, but Local 715 did not maintain bills or invoices from the vendors.

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.

I want to extend my personal appreciation to you for the cooperation and courtesy extended during this compliance audit and providing Local 715's financial records. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,



Investigator