



August 9, 2010

Stephen Contini, Treasurer  
Food and Commercial Workers  
Local 20C  
3156 Josephine St.  
Dover, OH 44622

Case Number: [REDACTED]  
LM Number: 001837

Dear Stephen Contini:

This office has recently completed an audit of Food and Commercial Workers 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 July 21, 2010, 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.

#### Reporting Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-3 filed by Local 20C for the fiscal year ended June 30, 2009, was deficient in the following areas:

1. Local 20C did not include some reimbursements to officers totaling at least \$700 in the amounts reported in Item 24 (All Officers and Disbursements to Officers). The union must report all payments to officers, including reimbursed expenses such as compensation for meals and office supplies, which are reported under Item 24 E.
2. Local 20C did not report the value of fixed assets held by the union in Item 29. For example, the union owns four computers, two of which are the recently purchased laptop models held by yourself and Recording Secretary Denicola. These and any other applicable items need to be reported as union assets.

I am not requiring that Local 20C file an amended LM report for 2009 to correct the deficient items, but Local 20C has agreed to properly report the deficient items on all future reports it files with the Office of Labor-Management Standards.

Stephen Contini

August 9, 2010

Page 2 of 2

I want to extend my personal appreciation to Food and Commercial Workers Local 20C 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,

A solid black rectangular box redacting the signature of the investigator.

Investigator

cc: Jack Meredith, President