

U.S. Department of Labor

Employment Standards Administration  
Office of Labor-Management Standards  
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November 2, 2006

Ms. Michele Sturman, Treasurer  
Government Employees, AFL-CIO  
Local 2203  
Federal Emergency Management Agency  
26 Federal Plaza, Suite 1307  
New York, NY 10278

Re: Case Number: [REDACTED]

Dear Ms. Sturman:

This office has recently completed an audit of Government Employees, Local 2203 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 Sharon Edwards on November 9, 2006, 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.

The CAP disclosed that Local 2203 failed to maintain adequate records of receipts and disbursements. Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that adequate records be maintained for at least 5 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, all records used or received in the course of union business must be retained. This includes, in the case of disbursements, not only the retention of original bills, invoices, receipts, and vouchers, but also adequate additional documentation, if necessary, 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 the case of receipts, the date, amount, purpose, and source of all money received by the union must be recorded in at least one union record.

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The CAP also disclosed that union officers failed to maintain adequate documentation for reimbursed expenses. The date, amount, and business purpose of every expense must be recorded on at least one union record. In addition, the names of individuals present for meal expenses and the locations (names of restaurants) where meal expenses were incurred must be recorded.

As agreed, provided that Local 2203 maintains adequate documentation as discussed above in the future, no additional enforcement action will be taken regarding these violations.

In addition, the CAP disclosed some reporting deficiencies. Direct disbursements to officers and employees for reimbursement of expenses incurred while conducting union business must be reported in Column F of Schedules 11 and 12 (Disbursements for Official Business). Indirect disbursements made to another party (such as a credit card company) for business expenses incurred by union personnel must also be reported in Column F of Schedules 11 and 12. Any direct or indirect disbursements to union personnel for expenses not necessary for conducting union business must be reported in Column G (Other Disbursements) of Schedules 11 and 12.

Local 2203 filed an amended LM report for 2005 to correct the deficient items, and as agreed, the union will properly report the deficient items on all future reports filed with this agency.

I want to extend my personal appreciation to Government Employees, Local 2203 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: President Walter Dobinson