U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
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August 9, 2007

Ms. Susan Behr, Treasurer
Carpenters AFL-CIO
Local 2187
P.O. Box 505
Montandon, PA 17850

Re: Case Number: [redacted]
LM File Number: 511-570

Dear Ms. Behr:

This office has recently completed an audit of Carpenters Local 2187 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 August 6, 2007 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 services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be 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 2187's 2007 records revealed the following recordkeeping violations:

Information not Recorded in Meeting Minutes

During the audit you advised OLMS that the executive board authorized all disbursements and receipts for each monthly exeuctive board meeting. A financial report was created for each meeting which itemized the disbursements and receipts for each month. However, there was no meeting minutes maintained to refer to any of those issues. Minutes of all membership or executive board meetings must report any disbursement authorizations made at those meetings.

Based on your assurance that Local 2187 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 Carpenters Local 2187 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,

[redacted]
Investigator

cc: Ray Steranko, Council Rep.