

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Dallas District Office
525 Griffin Street
Room 300
Dallas, TX 75202
(972)850-2500 Fax: (972)850-2501



October 8,2008

Mr. Douglas Chapman, President
Machinist, AFL-CIO
Local Lodge 2208
1953 Bedford Rd
Bedford, Texas 70021

LM File Number 006-932

Case Number: [REDACTED]

Dear Mr. Chapman:

This office has recently completed an audit of Local Lodge 2208 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 and International Machinist Auditor Linda Seeley on July 29,2008, the following problem was disclosed during the CAP. The matter listed below is not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

Reporting Violation

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 Lodge 2208 for fiscal year ending December 31,2007, was not received by OLMS by the due date of March 30,2008. The Form LM-3 must be filed within 90 days after the end of your organization's fiscal year.

I want to extend my personal appreciation to Local Lodge 2208 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: Michael Santarcangelo, Secretary-Treasurer

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Miami Resident Investigative Office
One East Broward Boulevard
Room 608
Ft. Lauderdale, FL 33301
(954)356-6850 Fax: (954)356-6852



September 29,2008

Mr. Robert Fiore, Secretary-Treasurer
Longshoremens Asn., AFL-CIO
Local 2062
1610 Port Boulevard
Miami, FL 33132

LM File Number 540-401
Case Number: [REDACTED]

Dear Mr. Fiore:

This office has recently completed an audit of Longshoremens Local 2062 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 September 29,2008, 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 2062's 2007 records revealed the following recordkeeping violations:

1. General Expenses

Local 2062 did not retain adequate documentation for expenses incurred by union officers and employees totaling at least \$1,225.64. For example, there were three check payments for translation services from English to Spanish at membership meetings and for the local bylaws; however, Local 2062 did not keep invoices or receipts to support the translation services were used for union business.

As previously 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.

Based on your assurance that Local 2062 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above recordkeeping violations.

I want to extend my personal appreciation to Longshoremens Local 2062 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: Andres Osorio, President