

U.S. Department of Labor

Office of Labor-Management Standards
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October 25, 2010

Mr. Francis Hopcroft, Treasurer
Teachers AFL-CIO Local 2403
Wentworth Faculty Federation
550 Huntington Avenue
Boston, MA 02115

LM File Number 504-717
Case Number: [REDACTED]

Dear Mr. Hopcroft:

This office has recently completed an audit of Wentworth Faculty Federation 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 President Marilyn Stern on October 20, 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. The CAP disclosed the following:

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 2403 for the fiscal year ended May 31, 2009, was deficient in the following area:

Disbursements to Officers (LM-3)

Local 2403 did not include some reimbursements to officers totaling at least \$385 in the amounts reported in Item 24(E) (Officer Allowances and Other

Disbursements). It appears the union erroneously reported these payments in Item 54 (Other Disbursements).

The union must report most direct disbursements to Local 2403 officers and some indirect disbursements made on behalf of its officers in Item 24. A "direct disbursement" to an officer is a payment made to an officer in the form of cash, property, goods, services, or other things of value. See the instructions for Item 24 for a discussion of certain direct disbursements to officers that do not have to be reported in Item 24. An "indirect disbursement" to an officer is a payment to another party (including a credit card company) for cash, property, goods, services, or other things of value received by or on behalf of an officer. However, indirect disbursements for temporary lodging (such as a union check issued to a hotel) or for transportation by a public carrier (such as an airline) for an officer traveling on union business should be reported in Item 48 (Office and Administrative Expense).

I am not requiring that Local 2403 file an amended LM report for 2009 to correct the deficient items, but Local 2403 has agreed to properly report the deficient items on all future reports it files with OLMS.

I want to extend my personal appreciation to Wentworth Faculty Federation 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: Marilyn Stern, President