



March 7, 2023

Daniel Thacker, Secretary-Treasurer
Teamsters Local Union 610
11472 Schenck Drive, Suite E
Maryland Heights, MO 63043

Case Number: 510-6025370()
LM Number: 012170

Dear Daniel Thacker:

This office has recently completed an audit of Teamsters Local Union 610 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 Office Coordinator Mary Joan "MJ" Hall on November 28, 2022, 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 Violation

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 610's 2021 records revealed the following recordkeeping violation:

Receipt Dates not Recorded

Entries in Local 610's QuickBooks receipts ledger reflect the date the union deposited money, but not the date money was received. Union receipts records must show the date of receipt. For example, Local 610 did not record the receipt of the Payment Protection Loan (PPP) Loan amount of \$84,887 on April 13, 2021, in QuickBooks. The loan amount was recorded as April 30, 2021, when it was transferred from one account to another. The date of receipt is required to verify, explain, or clarify amounts required to be reported in Statement B (Receipts and Disbursements) of the LM-2. The LM-2 instructions for Statement B state that the labor organization must record receipts when it actually receives money and disbursements when it actually pays out money. Failure to record the date money was received could result in the union reporting some receipts for a different year than when it actually received them.

Based on your assurance that Local 610 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violation.

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-2) filed by Local 610 for the fiscal year ended December 31, 2021 was deficient in the following areas:

Failure to Report Loans Payable (Schedule 9)

The audit disclosed a violation of LMRDA Section 201(a), which requires a union to report details of all loans payable on which the labor organization owed money at any time during the reporting period except those secured by mortgages or similar liens on real property (land or buildings) that must be reported in Item 32 (Mortgages Payable) of Statement A. If any loans payable were written off during the reporting period, the reason and amount must be reported in Item 69 (Additional Information). Local 610 reported the Paycheck Protection Program (PPP) loan monies in Schedule 14 (Other Receipts) rather than Schedule 9 (Loans Payable), which provides detailed information regarding the loans. Additionally, the reason for and the amount written off were not provided in Item 69 (Additional Information).

Local 610 filed an acceptable amended Form LM-2 for the fiscal year ended December 31, 2021, to correct the deficient item discussed above.

Other Information

Section 201(a) of the LMRDA requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. A union can verify on OLMS's Online Public Disclosure Room if the most recent amended bylaws was submitted.

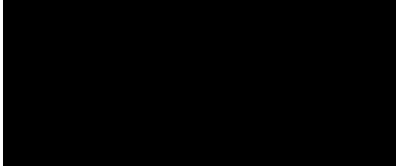
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I want to extend my personal appreciation to Teamsters Local Union 610 for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,



Investigator

cc: Jeffery Hall, President
Mary Joan "MJ" Hall, Office Coordinator