



January 3, 2024

Mr. Antwon Gibson, President  
Electrical Workers, UE Independent  
Local Union 610  
413 Wall Avenue, Suite 3  
Wall, PA 15148-1379

Case Number: 140-6027759( )  
LM Number: 016942

Dear Mr. Gibson:

This office has recently completed an audit of 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 on December 20, 2023, 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 Union 610's 2023 records revealed the following recordkeeping violations:

#### 1. General Expenses

Local Union 610 did not retain adequate documentation for payments to Verizon for the union's phone and internet services. For example, the union uses their online banking to

make payments to Verizon and only maintains the receipt of payment from Verizon acknowledging the union's payment, not the entire bill.

As 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.

## 2. Meal Expenses

Local Union 610 did not require officers and employees to submit itemized receipts for meal expenses totaling at least \$171.12. For example, on September 28, 2023, Local Union 610 Treasurer Roselyn Schmidt received reimbursement of \$171.12 for an executive board meal purchased on September 27, 2023, at Bob Evan's Restaurant. The receipt attached to the voucher was not itemized and only contained information as to the total amount of the purchase.

The union must maintain itemized receipts provided by restaurants to officers and employees. These itemized receipts are necessary to determine if such disbursements are for union business purposes and to sufficiently fulfill the recordkeeping requirement of LMRDA Section 206.

Based on your assurance that Local Union 610 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 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: Ms. Roselyn Schmidt, Treasurer