



March 25, 2015

Mr. Dave Pettigrew, President  
Steelworkers, AFL-CIO  
Local 04-607  
2122 Colvin Blvd  
Tonawanda, NY 14150

Case Number: 110-6002911( )  
LM Number: 051250

Dear Mr. Pettigrew:

This office has recently completed an audit of Steelworkers, Local 04-607 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 Financial Secretary Doug Bunker on March 5, 2015, 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 04-607's 2014 records revealed the following recordkeeping violation:

General and Reimbursed Expenses

Local 04-607 did not retain adequate documentation for general expenses and reimbursed expenses incurred by union officers totaling at least \$700. For example, a general expense for a committee lunch in the amount of \$47.47 was missing any supporting documentation. In addition, a reimbursement in the amount of \$400 to Doug Bunker for airfare and lodging was missing any supporting documentation.

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.

Based on your assurance that Local 04-607 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violation.

I want to extend my personal appreciation to USW Local 04-607 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: Mr. Douglas Bunker, Financial Secretary  
Mr. Gary Knoer, Treasurer