



May 3, 2018

Jose Rojas, President
Government Employees AFGE AFL-CIO
Local Union 506
P.O Box 68
Sumterville, FL 33585

Case Number: 410-6006489
LM Number: 542690

Dear Jose Rojas:

This office has recently completed an audit of Government Employees AFGE AFL-CIO Local Union 506 under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Civil Service Reform Act of 1978 (CSRA), 5 U.S.C. 7120, and the Department's regulations, 29 CFR 458. As discussed during the exit interview with you and Secretary-Treasurer Marion Furones on March 28, 2018, 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 of the LMRDA and Title 29 of the Code of Federal Regulations (C.F.R.) Section 403.7 require, among other things, that labor organizations maintain adequate records for at least five years after reports are filed by which the information on the reports can be verified, explained and clarified. Pursuant to 29 C.F.R. Section 458.3, this recordkeeping provision of the LMRDA applies to labor organizations subject to the requirements of the Civil Service Reform Act of 1978 (CSRA) as well. Therefore, as a general rule, labor organization must retain 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 506's 2016 records revealed the following recordkeeping violations:

1. General Reimbursed and Credit Card Expenses

Local 506 did not retain adequate documentation for reimbursed expenses and credit card expenses incurred by Secretary-Treasurer Marian Furones totaling at \$609.87. The union failed to maintain the original receipts and voucher for the Discover Card payment on January 25, 2016 totaling \$609.87.

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. Disposition of Property

Local 506 did not maintain an inventory of over 60 door prize items, gift cards, and other items it purchased or gave away. The union must report the value of any union property on hand at the beginning and end of each year in Item 30 (Other Assets) of the LM-3. The union must retain an inventory or similar record of property on hand to verify, clarify, and explain the information that must be reported in Item 30.

The union must record in at least one record the date and amount received from each sale of door prize items, gift cards and other items.

3. Failure to Record Receipts

Local 506 did not properly record in its QuickBooks program three receipts as income totaling at least \$6,900. For example, on May 20, 2016, Secretary-Treasurer Marian Furones deposited \$1,740. This deposit was a refund from the Bank of America for duplicate credit card charges, but it was not appropriately recorded as a deposit in QuickBooks. Union receipts records must include an adequate identification of all money received, and the source of the money.

Based on your assurance that Local 506 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 Government Employees AFGE AFL-CIO Local Union 506 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: Marion Furones, Secretary-Treasurer