

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
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July 3, 2007

Mr. Bert A. Winton, Treasurer
Studio Security & Fire Association
Warner Bros
PO Box 71215
Burbank, CA 91510

LM File Number 051-890

Case Number: [REDACTED]

Dear Mr. Winton:

This office has recently completed an audit of Local SSFA 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 June 26, 2007, 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:

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

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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 SSFA's records for fiscal year ended August 31, 2006 revealed the following recordkeeping violation:

General Reimbursed and Credit Card Expenses

Local SSFA did not retain adequate documentation for reimbursed expenses and credit card expenses incurred by you and President Aaron Sicoff totaling at least \$8088.83. For example, credit card expenses for you and Aaron Sicoff in June 2006 totaled \$2399.54, lacked adequate documentation or authorization.

As previously 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 SSFA 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 SSFA for the cooperation and courtesy extended during this 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,

Jo Anne Appel
Acting District Director

cc: Aaron Sicoff, President