

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
San Francisco District Office
90 7th Street
Suite 18-100
San Francisco, CA 94103
(415) 625-2661 Fax:(415) 625-2662



February 28, 2008

Ms. Andrea Pelous, Secretary Treasurer
Stage and Picture Operators, AFL-CIO
Local 784
1182 Market Street Suite 213
San Francisco, CA 94102

LM File Number: 033-930

Case Number: [REDACTED]

Dear Ms. Pelous:

This office has recently completed an audit of IATSE Local 784 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 Business Agent David Besser on February 20, 2008, 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 audit 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 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 784's 2006 records revealed the following recordkeeping violation:

Lost Wage Reimbursements

Local 784 did not have adequate documentation for lost wage reimbursement payments to union officers and members totaling at least \$455.00. The union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the number of hours lost each date, the applicable rate of pay, and a description of the union business conducted. In September 2006 the union started maintaining records of lost time wages, but there is insufficient documentation for the lost time wages paid prior to September 2006. At the exit interview it was suggested that Local 784 devise a standard form to use for claiming lost time reimbursements in order to have uniform documentation of the payments.

I want to extend my personal appreciation to IATSE Local 784 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,



Senior Investigator

cc: Ms. Cynthia Fusco, President

Mr. William Sokol, Attorney

Letter/Ms. Andrea Pelous

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