

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Cincinnati District Office
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January 28, 2008

Mr. Richard Street, Recording Secretary/Treasurer
Independent Union of Graphic Industry International Personnel
12409 Taylorsville Road
Louisville, KY 40299

LM File Number: 516-342
Case Number: [REDACTED]

Dear Mr. Street:

This office has recently completed an audit of Independent Union of Graphic Industry International Personnel (IUGIIP) 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 Investigator [REDACTED] discussed with you on January 28, 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.

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 the IUGIIP's 2007 records revealed the following recordkeeping violation:

Failure to Maintain Supporting Documentation for Disbursements

The IUGIIP did not maintain adequate documentation for per diem payments and retirement gifts when it failed to maintain a bill, invoice, voucher or similar record for those disbursements. Specifically, the IUGIIP did not maintain supporting documentation for three per diem payments: check [REDACTED] for \$75.00 payable to Richard Street, check [REDACTED] for \$125.00 payable to Mike Huggins, and check [REDACTED] for \$125.00 payable to Ricky Putman. The union also did not maintain supporting documentation for three retirement gifts: check [REDACTED] for \$400.00 payable to [REDACTED]; check [REDACTED] for \$400.00 payable to [REDACTED]; and check [REDACTED] for \$400.00 payable to [REDACTED].

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 the IUGIIP 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 IUGIIP 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,

Lesta A. Chandler
District Director

cc: Mr. Philip Roberts, President