

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
Pittsburgh District Office  
1000 Liberty Avenue  
Room 1411  
Pittsburgh, PA 15222  
(412)395-6925 Fax: (412)395-5409



January 25, 2006

Ms. Ginger Markle, Treasurer  
Pennsylvania Independent Nurses  
Butler Memorial Hospital PINBMH  
140 Springdale Church Road  
West Sunbury, PA 16061

LM File Number 537-273  
Case Number: [REDACTED]

Dear Ms. Markle:

This office has recently completed an audit of Butler Memorial Hospital PINBMH 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 President Karla Wurm on October 7, 2009, 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 Butler Memorial Hospital PINBMH 2008 records revealed the following recordkeeping violation:

#### Meal Expenses

Butler Memorial Hospital PINBMH did not require officers to submit itemized receipts for meal expenses totaling at least \$165.74. The union must maintain itemized receipts provided by restaurants to officers and employees. These itemized receipts are necessary to determine if such disbursements are for union business purposes and to sufficiently fulfill the recordkeeping requirement of LMRDA Section 206.

Butler Memorial Hospital PINBMH records of meal expenses did not always include written explanations of union business conducted or the names and titles of the persons incurring the restaurant charges. For example, on October 8, 2008, Executive Board member Tamara Kaufmann was reimbursed \$165.74 for meal expenses but did not provide a written explanation of the charges. Union records of meal expenses must include written explanations of the union business conducted and the full names and titles of all persons who incurred the restaurant charges. Also, the records retained must identify the names of the restaurants where the officers or employees incurred meal expenses.

Based on your assurance that Butler Memorial Hospital PINBMH 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 Butler Memorial Hospital PINBMH for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials

Ms. Ginger Markle  
January 25, 2006  
Page 3 of 3

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: Karla Wurm, President