



December 9, 2013

Mr. Abdou Samb, Secretary-Treasurer
Steelworkers Local 1493
504 Sorna Drive
Englewood, OH 45322

Case Number: 350-3502288 [REDACTED]

LM Number: 511845

Dear Mr. Samb:

This office has recently completed an audit of Steelworkers Local 1493 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 September 30, 2013, 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.

Record Keeping 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 1493's 2012 records revealed the following recordkeeping violations:

1. General Reimbursed Expenses

Local 1493 did not retain adequate documentation for reimbursed expenses incurred by union officers. For example, original receipts for refreshments provided by [REDACTED] at March and May union meetings were not provided with reimbursement vouchers.

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. Lost Wages

Local 1493 did not retain adequate documentation for lost wage reimbursement payments to union officers totaling at least \$2,506.65 on at least 17 separate instances. For example, only 10 lost time vouchers were provided to OLMS, however, at least 27 checks were issued to union officers for lost time during the audit period. The union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS audit found that Local 1493 provided an adequate description on the check stubs of the union business conducted, but did not detail the date(s) that wages were lost, the number of hours or rate of pay. The lost time vouchers provided all of the required information.

During the exit interview, I provided a compliance tip sheet, *Union Lost Time Payments*, that contained a sample of an expense voucher Local 1493 may use to satisfy this requirement. The sample identifies the type of information and documentation that the local must maintain for lost wages and other officer expenses.

3. Meeting Minutes

Local 1493 did not retain adequate documentation for meeting minutes during the audit period. The local provided meeting minutes reflecting the membership's vote and approval of dues reimbursement for officers as a form of salary, although the minutes do not show a date for when the meeting took place. Minutes were also provided for 5/18/2012, 8/16/2012, and third meeting with no visible date. Checks were written on 1/5/12, 3/21/12, and 6/14/12 for lost time and expenses for a union meeting, but no minutes were provided for these dates.

You indicated that the local has a new recording secretary; therefore, you did not necessarily have access to all of the old minutes taken by the previous officer. You will be sure to get copies of all of the minutes immediately following the meetings from now on.

Based on your assurance that Local 1493 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 Steelworkers Local 1493 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