



September 23, 2015

Mr. Roy Wilder, Financial Secretary/Treasurer
UFCW Local 664-C

Case Number: 350-6003706()
LM Number: 542-214

Dear Mr. Wilder:

This office has recently completed an audit of UFCW Local 664-C 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 23, 2015, 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.

Reporting Violations

Title II of the LMRDA establishes certain reporting requirements for labor organizations. For example, Section 201 requires each labor organization to file an annual Labor Organization Annual Report Form (LM-2, LM-3, or LM-4) within 90 days after the end of the labor organization's fiscal year. Furthermore, these annual financial reports must accurately disclose the union's financial condition and operations.

1. Delinquent Labor Organization Annual Report Forms

The audit disclosed a violation of LMRDA Section 201 in that Local 664-C has chronically filed its LM-3 annual report forms after the required 90 day deadline. For example, the local's 2014 LM-3 report was due on March 31, 2015; but was not actually filed until June 29, 2015. In fact, Local 664-C has been delinquent in filing every LM-3 report for at least the past 14 fiscal years.

Based on your assurance that Local 664-C will timely file its Labor Organization Annual Report Forms in the future, OLMS will take no further enforcement action at this time regarding the above violation.

2. Deficient Labor Organization Annual Report Form

The audit disclosed a violation of LMRDA Section 201 in that Local 664-C incorrectly reported the amount of per capita disbursements it made during 2014 in Item 47 Statement B of the LM-3 report for fiscal year ending December 31, 2014. Specifically, the local included

check number 3994, dated December 28, 2013, in the amount of \$3,241 on the 2014 report, even though that disbursement was made in the local's fiscal year ending December 31, 2013.

I am not requiring that Local 664-C file an amended LM report for 2014 to correct the deficient item, but Local 664-C has agreed to properly report the deficient item on all future reports it files with OLMS.

I want to extend my personal appreciation to UFCW Local 664-C 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,

A solid black rectangular box used to redact the signature of the sender.

Senior Investigator