



April 13, 2016

Mr. David Davenport, Secretary-Treasurer
Locomotive Engineers IBT Division 309
3021 Waters View Circle
Orange Park, FL 32073

Case Number: 410-6000294 [REDACTED]
LM Number: 033950

Dear Mr. Davenport:

This office has recently completed an audit of Locomotive Engineers IBT Division 309 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 April 5, 2016, 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 Division 309's 2014 records revealed the following recordkeeping violations:

General Reimbursed Expenses

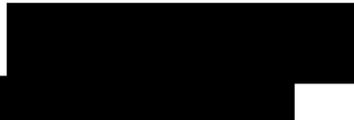
Division 309 did not retain adequate documentation for reimbursed expenses incurred by union officers totaling at least \$235.00. For example, there were reimbursement check payments made for expenses involving the purchase of office supplies (e.g. printer

cartridges); however, Division 309 did not keep descriptive expense receipts or invoices to support that office supply expenses were used for union business only. A purpose for union business is necessary for reimbursed expenses to support union expenses as opposed to personal expenses.

As previously noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and secretary-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.

I want to extend my personal appreciation to Locomotive Engineers IBT Division 309 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 large black rectangular redaction box covering the signature of the investigator.

Investigator