



August 30, 2016

Mr. Brian Urquhart, Secretary-Treasurer
Insulators AFL-CIO
New York-New England States Conference
4838 Culver Road
Rochester, NY 14622

Case Number: 110-6008456
LM Number: 023118

Dear Mr. Urquhart:

This office has recently completed an audit of Insulators AFL-CIO, New York-New England States Conference 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 July 22, 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.

Record keeping Violation

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 New York-New England States Conference 2015 records revealed the following recordkeeping violation:

General Disbursements:

The Conference did not retain adequate documentation for a disbursement totaling \$5,000 paid to the Asbestos Workers Local 30 for a conference held at the Turning Stone Resort in Verona, NY. The receipt and invoices retained as supporting documentation did not sufficiently explain the amount to Local 30. If a receipt is not sufficiently descriptive, additional information can be noted on the receipt.

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.

I want to extend my personal appreciation to the Insulators, New York-New England States Conference 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 onto future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,



Investigator

cc: Mr. Francis Boudrow, President