



May 24, 2018

Ms. Darlene Parisi, President  
Production Service Employees Local 143  
333 Sylvan Avenue, Suite 400  
Englewood Cliffs, NJ 07632-2734

Case Number: 130-6011952  
LM Number: 505320

Dear Ms. Parisi:

This office has recently completed an audit of Production Service Employees Local 143 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 Secretary-Treasurer Maryanne Sullivan on May 3, 2018, 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 Local 143's 2017 records revealed the following recordkeeping violations:

#### 1. Lack of Salary Authorization

Local 143 did not maintain records to verify that the salaries reported in Item 24 (All Officer and Disbursements to Officers) of the LM-3 was the authorized amount and therefore was correctly reported. The union must keep a record, such as meeting minutes, to show the current salary authorized by the entity or individual in the union with the authority to establish salaries.

2. Lack of Vacation Time Records

During the OIQ, it was determined that the president of the local is provided four weeks of vacation time each year. Local 143 did not retain adequate documentation for vacation time used and/or carried over by the president to the next year. Proper documentation of vacation hours is the responsibility of the local union officers.

Based on your assurance that Local 143 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Reporting Violations

Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. Local 143 amended its constitution and bylaws in 1999, but did not file a copy with its LM report for that year. Local 143 has now filed a copy of its constitution and bylaws.

Other Violations

Failure to Hold Membership Meetings

In accordance with Local 143's Constitution and Bylaws, Article VII, Section 1, regular meetings shall be held at such times and places as decided by the Executive Board. During the OIQ, it was determined that regular membership meetings are held in April, May, or June. The audit revealed that no membership meetings or executive board meetings were held. Subsequently, there were no membership meeting minutes or executive board meeting minutes.

During the exit interview, you and Ms. Sullivan advised that you would at least attempt to hold membership meeting minutes, even if there is no interest from the general membership of the union.

I want to extend my personal appreciation to Production Service Employees Local 143 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 me at [REDACTED].

Sincerely,

[REDACTED]  
Investigator