



April 29, 2019

Mr. Derrick Lawson, President
Food and Commercial Workers Local 483-C
P.O. Box 354
Franklin, LA 70538

Case Number: 420-6014994
LM Number: 033821

Dear Mr. Lawson:

This office has recently completed an audit of the United Food and Commercial Workers Local 483-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, Treasurer Dustin Trosclair, and Recording Secretary Drake Daigle on April 29, 2019, 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 483-C's fiscal year ending June 30, 2018, records revealed the following recordkeeping violations:

1. General Reimbursement

Local 483-C did not retain adequate documentation for reimbursed expenses incurred by Dustin Trosclair totaling at least \$625.55. For example, Trosclair failed to provide the

Local his receipts for travel to the Las Vegas Convention for dates September 5, 2017 and November 6, 2017, which included receipts for reimbursement for his airline ticket, parking, and baggage. Trosclair also failed to provide the Local with receipts for office supplies purchased during the audit year.

2. Failure to Maintain Financial Statements

During the course of the audit period it was revealed that copies of canceled checks and check stubs were not maintained by the local. The local failed to keep copies of check stubs and canceled checks that could be used to clarify, verify, and explain expenses. Local 483-C also did not retain adequate documentation for a savings account that was closed and combined with the Strike Fund savings account during the audit period.

As noted above, labor organizations must retain original receipts, bills, bank statements, canceled checks, 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.

Based on your assurance that Local 483-C will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above 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 483-C amended its constitution and bylaws in 2004, but did not file a copy with its LM report for that year.

Local 483-C has now filed a copy of its constitution and bylaws.

I want to extend my personal appreciation to Food and Commercial Workers Local 483-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,



Supervisory Investigator