



June 28, 2019

Mr. Keith Walters, President/Business Manager  
Electrical Workers Local 2007  
1007 Park Boulevard  
Altoona, PA 16601

Case Number: 140-6014555-  
LM Number: 032-647

Dear Mr. Walters:

This office has recently completed an audit of Electrical Workers Local 2007 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 IBEW International Representative Pasquale Gino, on June 26, 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 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 Local 2007's 2018 records revealed the following recordkeeping violation:

#### Lost Wages

Local 2007 did not retain adequate documentation for lost wage reimbursement payments to union officers totaling at least \$3,420.00. The union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS

audit found that Local 2007 records did not identify the union business conducted, the number of hours lost on each date, or the applicable rate of pay.

During the exit interview, I provided a compliance tip sheet, *Union Lost Time Payments*, that contained a sample of an expense voucher Local 2007 may use to satisfy this requirement. The sample identifies the type of information and documentation that the local must maintain for lost wages and other officer expenses.

Based on your assurance that Local 2007 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

#### Reporting Violation

The audit disclosed a violation of LMRDA Section 201(b), which requires the president and treasurer or corresponding principal officers of each labor organization to file an annual financial report accurately disclosing their financial condition and operations within 90 days after the end of its fiscal year. Local 2007 failed to file the Labor Organization Annual Report (Form LM-3) for the fiscal years ending May 31, 2016 and May 31, 2017.

As agreed, Local 2007 will file your union's delinquent reports with OLMS as soon as possible, but no later than July 26, 2019. The reports must be filed electronically using the Electronic Forms System (EFS) available at the OLMS website at [www.olms.dol.gov](http://www.olms.dol.gov). Before filing, please review the report thoroughly to be sure it is complete and accurate.

I want to extend my personal appreciation to IBEW, Local 2007 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,



Investigator

cc: Mr. Cameron Irvin, Recording Secretary  
Mr. Pasquale Gino, IBEW International Representative, 3<sup>rd</sup> District