

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
St. Louis District Office  
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December 1, 2008

Mr. Fred Wolfmeyer, Vice President  
Postal Workers AFL-CIO  
St. Louis Gateway District Area  
1717 South Broadway  
St. Louis, MO 63104

LM File Number 072-025  
Case Number: [REDACTED]

Dear Mr. Wolfmeyer:

This office has recently completed an audit of Postal Workers St. Louis Gateway District Area 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 Rick Rollins on November 18, 2008, the following problem was disclosed during the CAP. The matter listed below is not exhaustive 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 the Postal Workers St. Louis Gateway District Area's 2007 records revealed the following recordkeeping violation:

#### Credit Card Expenses

The Postal Workers St. Louis Gateway District Area did not retain adequate documentation for credit card expenses incurred totaling at least \$979.57. For example, there were no backup records to support a January 4, 2007 charge of \$24.18 to Subway; a March 17, 2007 charge of \$336.87 to Limousine of Chicago; and a June 15, 2007 charge of \$134.64 to The St. Louis Framery.

As previously 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.

Based on your assurance that the Postal Workers St. Louis Gateway District Area will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violation.

I want to extend my personal appreciation to Postal Workers St. Louis Gateway District Area 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,



Mr. Fred Wolfmeyer  
December 1, 2008  
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Investigator

cc: Rick Rollins, Secretary-Treasurer  
Anthony Harris, President