

**U.S. Department of Labor**

Office of Labor-Management Standards  
JFK Federal Building  
Suite E-365  
Boston, Massachusetts 02203  
Telephone: (617) 624-~~6698~~ 6698



November 24, 2004

Russell Roy, President  
United Steelworkers of America  
USWA Local 16031

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Re: LM # 010-419

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Dear Mr. Roy:

This office has recently completed an audit of the USWA Local 16031 under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Labor-Management Reporting and Compliance Act of 1959, as Amended (LMRDA). As discussed during the exit interview with you on November 23, 2004 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.

The CAP disclosed that the union's 12/31/2003 Labor Organization Annual Report, LM-3 was deficient and did not meet the standards of acceptability in violations of LMRDA Section 201(b). Specifically Item 24 All Officers and Disbursements to Officers did not include all payments made to officers during the fiscal year. Allowances and expense reimbursements made to officers were not included in Item 24. An amended LM-3 Report for 12/31/2003 is required to be filed within 30 days. Please send the Amended Report to my attention at the above address.

The CAP also disclosed that the Local failed to maintain all supporting documentation for expenses incurred i.e. gift certificates, officer expenses, and vacation allowance. Section 206 of the LMRDA requires that a union maintain adequate records to verify the accuracy of reports filed with the Secretary of Labor. Since you agreed to keep better records in the future, no further action will be taken on this matter.

I want to extend my personal appreciation for the cooperation and courtesy extended by you during this compliance audit. If we can be of any assistance in the future, please do not hesitate to call 617-664-6698.

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Investigator