

Philip Cox, Treasurer  
Food and Commercial Workers AFL-CIO  
LU 419-C  
1325 Wilson Avenue  
Atwater, Ohio

RE: 2

Dear Mr. Cox:

This Office has recently completed an audit of Painters Local 1103 under the Compliance Audit Program (CAP) to determine compliance with provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). As discussed during the exit interview with you on September 22, 2005, 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.

Title II of the LMRDA establishes certain reporting and record keeping requirements. Section 206 requires, among other things, that adequate records be maintained 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, all records used or received in the course of union business must be retained. This includes, in the case of disbursements, not only the retention of original bills, invoices, receipts, and vouchers, but also adequate additional documentation, if necessary, showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipients of the goods or services.

The following record keeping violations were revealed during the audit of *Food and Commercial Workers LU 419-C's* 07/01/2004 through 6/30/2005 records:

LU 419-C failed to maintain receipts for disbursements attributable to lost time claims of officers. For example, some officers claimed meals during lost time, however, receipts were not submitted with the lost time worksheet.

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As agreed, provided that LU 419-C maintains adequate documentation for its disbursements in the future, no additional enforcement action will be taken regarding this violation.

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

Sincerely,

FCC

Investigator