

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
St. Louis District Office  
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September 7, 2006

Mr. Robert Kuehl, Treasurer  
Carpenters Local 4  
6623 Kimberly Road  
Davenport, IA 52806

Re: Case Number **██████████**

Dear Mr. Kuehl:

This office has recently completed an audit of Carpenters Local 4 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 Jim Jones on August 15, 2006, 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 recordkeeping requirements. Section 206 requires, among other things, that adequate records be maintained for at least 5 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 recipient(s) of the goods or services.


The audit of Local 4's records revealed that Local 4 failed to maintain all invoices pertaining to the purchase of materials for the building of the new union hall. The majority of invoices were maintained, but a few large expenses did not have any documentation. These purchases were verified through third-party interviews, and no further investigation was necessary.

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As agreed, provided that Local 4 maintains adequate documentation as discussed above in the future, no additional action will be taken regarding this violation.

I want to extend my personal appreciation to Carpenters Local 4 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