

Form LM-10 Questions

NCCMP

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Jim Cole

Groom Law Group, Chtd.

jvc@groom.com

(202) 861-0175

www.groom.com

DOL Questions & Fact Patterns

- LM-10 Exception for Banks & Insurance Companies (Question 1)
- Repayment of 2004 Expenses (Question 2)
- De minimis as a safe harbor (Question 3)
- What if employers/service providers split it and the amount each pays is below the de minimis (Questions 3 & 8)

DOL Questions & Fact Patterns

- Does the “conflict of interest” limitation apply to a Form LM-10? (Question 4)
- Is there an exception for personal gifts? What if the LM-10 filer doesn't know? (Question 5)
- What if administrative expenses are shared among plans, one plan pays and the other reimburses? Who files & how does the de minimis exception work? (Questions 6 & 7)

DOL Questions & Fact Patterns

- How does a labor union officer report a meal that was paid for by three different service providers? What if the plan service provider reimburses the plan that pays? (Question 8)
- If a union official is a director of an insurance company, how are his directors fees reported by the insurance company on a LM-10 and the union officer on a LM-30? (Question 9)

DOL Questions & Fact Patterns

- Do payments to a union or a union sponsored trust for advertisement in a sponsorship book or for a trade show booth have to be reported on a Form LM-10? (Question 10)
- Payments to a union for use of their logo or other intellectual property? (Question 11)
- Charitable Contributions, including scholarship, apprenticeship, and relief funds? (Question 12)

DOL Questions & Fact Patterns

- Charity dinner tickets? (Question 13)
- Receptions & dinners hosted by service providers? How does the LM-30 “consumption rule” work with LM-10 reporting by the host? (Question 14 & 16)
- Educational conference reportable costs – how much is reported on LM-10’s & LM-30’s? (Question 15)

DOL Questions & Fact Patterns

- Is a local union that only has public employees covered by the LMRDA? (Question 17)
- Union trustees who are not union officers, employees, or stewards need not report on a Form LM-30 and no Form LM-10 is required to be filed for them? (Question 18)
- Amounts paid for spouses and minor children need not be reported on a Form LM-10? (Question 19)

DOL Questions & Fact Patterns

- Payments to trusts in which a labor organization is interested need not be reported on a Form LM-10? (Questions 8 & 20)
- Are payments to union subsidiaries considered payments to a labor organization that must be reported on a LM-10? (Question 21)
- How do subsidiaries of Form LM-10 filers report? (Question 22)

DOL Questions & Fact Patterns

- What if LM-10 filers merge or are acquired and no adequate records are available? (Question 23)
- Who may sign an LM-10? (Question 24)
- Has OMB considered the cost of the new increased (and duplicative) reporting on the Form LM-10? (Question 25)

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