U S Department of Labor
Office of Labor Management
Standards
Washington DC 20210

FORM LM-30
LABOR ORGANIZATION OFFICER AND EMPLOYEE REPORT

Form approved
Office of Management
and Budget
No 1215 0188
Expires 11 30 2006

This report is mandatory under P L 86-257 as amended Failure to comply may result in criminal prosecution fines or civil penalties as provided by 29 U S C 439 or 440

For Official Use Only

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Rec'd
AUG 19 2005
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READ THE INSTRUCTIONS CAREFULLY BEFORE PREPARING THIS REPORT

1 File Number U 997

2 Fiscal Year Covered From 1 / 1 / 2004 Through 12 / 31 / 2004

3 Name and address of person filing

Name Rocco Davis

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

4 Name file number and address of labor organization

Name Laborers International Union of North America

Labor Organization File Number 000-131

P O Box Building and Room Number if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006

5 Position in labor organization VP at large Pac SW Reg Mgr, SPECIAL ASST TO THE GENERAL PRESIDENT (RD)

Enter appropriate data below if during the past fiscal year you or your spouse or minor child directly or indirectly had any of the following interests (except as specified in the exclusions set forth in the instructions)

A. Held an interest in engaged in transactions (including loans) with or derived income or other economic benefit of monetary value **from an employer whose employees your organization represents** or is actively seeking to represent

6 Name and address of Employer (including trade name if any)

Name

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

7 a Nature of Interest Transaction or Income

7 b Amount

Signature

15 Signature and verification The undersigned declares under penalty of Perjury and other applicable penalties of the law that all of the information submitted in this report (including the information contained in any accompanying documents) has been examined by the signatory and is to the best of the undersigned s knowledge and belief true correct and complete (See the section on penalties in the instructions)

Signed [signature] On 8/15/05 (202) 942-2293

Date Telephone Number

Name of Person Filing Rocco Davis	File Number U

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Columbia Management Group

Trade Name if any:

P O Box Bldg Room No if any:

Street: 100 Federal Street

City: Boston

State: Massachusetts ZIP Code + 4: 02110-1802

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name: Laborers' National Pension Fund

Trade Name if any:

P O Box Bldg Room No if any: Suite 105

Street: 14140 Midway Road

City: Dallas

State: Texas ZIP Code + 4: 75244 3672

11 a Nature of such dealing

Columbia Management Group provides financial services to the Laborers National Pension Fund

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

1/3/04 to 1/5/04 Lodging for self and spouse
Amount unknown best estimate $840

12 b Amount:

C Received from any employer (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers Health & Safety Fund of North Am

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

14 a Nature of payment

1/14/04 National Alliance for Fair Contracting
Meeting Meal

13 b Is the Business an Employer [ ] or Consultant [ ] ?

14 b Amount of payment: $31

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Columbia Management Group

Trade Name if any

P O Box Bldg Room No if any

Street 100 Federal Street

City Boston

State Massachusetts ZIP Code + 4 02110-1802

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name Laborers National Pension Fund

Trade Name if any

P O Box Bldg Room No if any Suite 105

Street 14140 Midway Road

City Dallas

State Texas ZIP Code + 4 75244-3672

11 a Nature of such dealing

Columbia Management Group provides financial services to the Laborers' National Pension Fund

11 b Approximate dollar value of such dealing unknown

12 a Nature of interest held or income received

1/4/04 2004 Sugar Bowl football game 1 ticket

12 b Amount $250

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers Health & Safety Fund of North Am

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

1/17/04 National Tri Fund Conference Meal

14 b Amount of payment: $85

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers-Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

1/18/04 to 1/22/04 National Tri Fund Conference Lodging

14 b Amount of payment: $1 422

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006-1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

1/19/04 National Tri Fund Conference Dinner

14 b Amount of payment: $128

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

1/22/04 National Tri Fund Conference Meal

14 b Amount of payment: $55

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers-Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

2/17/04 & 2/18/04 Pipeline Conference Lodging

14 b Amount of payment: $185

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers-Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

2/18/04 Pipeline Conference Meal

14 b Amount of payment: $63

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Palm Springs Riviera

Trade Name if any

P O Box Bldg Room No if any

Street 1600 North Indian Canyon Drive

City Palm Springs

State California ZIP Code + 4 92262-4602

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

The Palm Springs Riviera provides hotel services to the Laborers International Union of North America

11 b Approximate dollar value of such dealing **unknown**

12 a Nature of interest held or income received

2/6/04 Local Union 777 Meetings Lodging upgrade Amount unknown best estimate over $25

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [Intentionally left blank]

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

14 a Nature of payment

[Intentionally left blank]

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Local Union & District Council Pension Fund

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

14 a Nature of payment

3/31/04 Board of Trustees Dinner Meeting

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $83

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [Unable to recall hotel name]

Trade Name if any

P O Box Bldg Room No if any

Street [Unable to recall hotel address]

City Lihue

State Hawaii ZIP Code + 4

14 a Nature of payment

4/21/04 Site visit for 2005 Pacific Southwest Regional Conference Lodging Amount unknown best estimate $175

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Paul Aleman Union Labor Life Insurance Co

Trade Name if any

P O Box Bldg Room No if any

Street 1625 Eye Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 4698

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

The Union Labor Life Insurance Company provides multi line insurance financial services and administrative products to members of the Laborers International Union of North America

11 b Approximate dollar value of such dealing unknown

12 a Nature of interest held or income received

3/30/04 Dinner Amount unknown best estimate $75 to $100

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Paul Aleman Union Labor Life Insurance Co

Trade Name if any

P O Box Bldg Room No if any

Street 1625 Eye Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 4698

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

The Union Labor Life Insurance Company provides multi-line insurance financial services and administrative products to members of the Laborers International Union of North America

11 b Approximate dollar value of such dealing unknown

12 a Nature of interest held or income received

4/3/04 Pacific Southwest Regional Conference Golf Outing Amount unknown best estimate $55 to $60

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Paul Aleman Union Labor Life Insurance Co

Trade Name if any:

P O Box Bldg Room No if any:

Street: 1625 Eye Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 4698

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name:

Trade Name if any:

P O Box Bldg Room No if any:

Street:

City:

State: ZIP Code + 4:

11 a Nature of such dealing

The Union Labor Life Insurance Company provides multi line insurance financial services and administrative products to members of the Laborers International Union of North America

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

4/3/04 Pacific Southwest Regional Conference Dinner

12 b Amount: $35

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name [Intentionally left blank]

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

9 Business deals with

☐ a Labor Organization

☐ b Trust

☐ c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

[Intentionally left blank]

11 b Approximate dollar value of such dealing

12 a Nature of interest held or income received

[Intentionally left blank]

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [Unable to recall hotel name]

Trade Name if any

P O Box Bldg Room No if any

Street [Unable to recall hotel address]

City Lihue

State Hawaii ZIP Code + 4

14 a Nature of payment

4/21/04 Site visit for 2005 Pacific Southwest Regional Conference Lunch Amount unknown best estimate $45

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment.

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Fairmont Orchid Hotel

Trade Name if any

P O Box Bldg Room No if any

Street 1 North Kaniku Drive

City Kohala Coast

State Hawaii ZIP Code + 4 96743 9731

14 a Nature of payment

4/22/04 Site visit for 2005 Pacific Southwest Regional Conference Lodging Amount unknown best estimate $175

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Fairmont Orchid Hotel

Trade Name if any

P O Box Bldg Room No if any

Street 1 North Kaniku Drive

City Kohala Coast

State Hawaii ZIP Code + 4 96743-9731

14 a Nature of payment

4/22/04 Site visit for 2005 Pacific Southwest Regional Conference Dinner Amount unknown best estimate $75

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006-1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

4/26/04 to 4/30/04 National Tri Fund Board of Trustees Meetings Lodging

14 b Amount of payment: $1 088

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers-Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006-1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

4/27/04 National Tri Fund Board of Trustees Meetings Dinner for self and spouse

14 b Amount of payment: $224

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers-Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006-1703

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 a Nature of payment

4/28/04 National Tri-Fund Board of Trustees Meetings Meal

14 b Amount of payment: $57

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [One of the] National Tri Funds

Trade Name if any Please see attachment #1

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

14 a Nature of payment

April 2004 National Tri Fund Board of Trustees Meetings Golf outing Amount unkonwn best estimate over $25

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Laborers AGC Education & Training Fund

Trade Name if any

P O Box Bldg Room No if any P O Box 37

Street 37 Deerfield Road

City Pomfret Center

State Connecticut ZIP Code + 4 06259-2038

14 a Nature of payment

5/19/04 International Code Council and Code Development discussions Meal

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $28

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Local Union & District Council Pension Fund

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006-1703

14 a Nature of payment

6/16/04 Local Union & District Council Pension Fund Board of Trustees Meeting Dinner

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $78

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Paul Aleman & Ken Meister ULLICO

Trade Name if any: Union Labor Life Insurance Co

P O Box Bldg Room No if any:

Street: 1625 Eye Street NW

City: Washington

State: District of Columbia ZIP Code + 4: 20006-4698

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name:

Trade Name if any:

P O Box Bldg Room No if any:

Street:

City:

State: ZIP Code + 4:

11 a Nature of such dealing

The Union Labor Life Insurance Company provides multi line insurance financial services and administrative products to members of the Laborers' International Union of North America

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

6/2/04 Golf outing Amount unknown best estimate $50

12 b Amount:

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Stack & Chimney Committee

Trade Name if any:

P O Box Bldg Room No if any:

Street: [Address unknown]

City:

State: ZIP Code + 4:

14 a Nature of payment

6/26/04 Stack and Chimney Meetings Golf outing Amount unknown best estimate $80

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment.

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers-Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

14 a Nature of payment

8/22/04 to 8/25/04 National Tri-Fund Board of Trustees Meetings Lodging

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $895

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006-1703

14 a Nature of payment

8/22/04 National Tri Fund Board of Trustees Meetings Dinner

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment. $67

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Gene Borowski San Diego Hilton

Trade Name if any:

P O Box Bldg Room No if any:

Street: 1775 E Mission Bay Drive

City: San Diego

State: California ZIP Code + 4: 92109 6801

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name:

Trade Name if any:

P O Box Bldg Room No if any:

Street:

City:

State: ZIP Code + 4:

11 a Nature of such dealing

Hilton Hotels provides hotel services to the Laborers International Union of North America

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

7/12/04 Golf outing Amount unkown best estimate $55 to $60

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Bally s Hotel

Trade Name if any

P O Box Bldg Room No if any

Street 3655 South Las Vegas Blvd

City Las Vegas

State Nevada ZIP Code + 4 89109-4345

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

Bally s Hotel provides hotel services to the Laborers International Union of North America

11 b Approximate dollar value of such dealing unknown

12 a Nature of interest held or income received

8/6/04 Public Employee Department Conference Lodging upgrade Amount unknown best estimate over $25

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Brian Morton McMorgan and Company

Trade Name if any:

P O Box Bldg Room No if any: Suite 800

Street: One Bush Street

City: San Francisco

State: California ZIP Code + 4: 94104 4414

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name: [One or more benefit or trust funds

Trade Name if any: affiliated with LIUNA]

P O Box Bldg Room No if any:

Street:

City:

State: ZIP Code + 4:

11 a Nature of such dealing

McMorgan and Company provides financial services to one or more benefit or trust funds affiliated with the Laborers' International Union of North America

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

8/18/04 Northern California District Council Seminar Golf outing Amount unknown best estimate $135

12 b Amount:

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [Intentionally left blank]

Trade Name if any

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

14 a Nature of payment

[Intentionally left blank]

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Laborers-Employers Coop & Education Trust

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

14 a Nature of payment

11/4/04 Dinner Meeting

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $64

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Laborers Health & Safety Fund of North Am

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006-1703

14 a Nature of payment

11/15/04 National Tri Fund Board of Trustees Meetings Lodging

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $220

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Brian Morton McMorgan and Company

Trade Name if any

P O Box Bldg Room No if any Suite 800

Street One Bush Street

City San Francisco

State California ZIP Code + 4 94104-4414

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name [One or more benefit or trust funds

Trade Name if any affiliated with LIUNA]

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

McMorgan and Company provides financial services to one or more benefit or trust funds affiliated with the Laborers International Union of North America

11 b Approximate dollar value of such dealing **unknown**

12 a Nature of interest held or income received

11/8/04 Dinner Amount unknown best estimate $50 to $75

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [One of the] National Tri Funds

Trade Name if any Please see attachment #2

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

14 a Nature of payment

11/15/04 National Tri Fund Board of Trustees Meetings Dinner Amount unknown best estimate over $25

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Laborers-Employers Coop & Education Trust

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

14 a Nature of payment

11/16/04 National Tri Fund Board of Trustees Meetings Lodging

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $220

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [One of the] National Tri-Funds

Trade Name if any Please see attachment #3

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

14 a Nature of payment

11/16/04 National Tri-Fund Board of Trustees Meetings Dinner Amount unknown best estiamate over $25

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name [One of the] National Tri Funds

Trade Name if any Please see attachment #4

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

14 a Nature of payment

November 2004 National Tri Fund Board of Trustees Meetings Golf outing Amount unknown best estimate $45 to $55

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Local Union & District Council Pension Fund

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

14 a Nature of payment

11/29/04 National Coordinating Committee for Multiemployer Plans Conference Dinner

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $141

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name Local Union & District Council Pension Fund

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

14 a Nature of payment

12/14/04 & 12/15/04 Local Union & District Council Pension Fund Board of Trustees Meetings Lodging

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment $718

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name Arthur E Coia Jr HGK

Trade Name if any

P O Box Bldg Room No if any

Street 525 Washington Boulevard

City Jersey City

State New Jersey ZIP Code + 4 07310-1606

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name National Industrial Pension Fund

Trade Name if any

P O Box Bldg Room No if any

Street 905 16th Street N W

City Washington

State District of Columbia ZIP Code + 4 20006 1703

11 a Nature of such dealing

HGK provides financial services to the National Industrial Pension Fund

11 b Approximate dollar value of such dealing **unknown**

12 a Nature of interest held or income received

11/30/04 Dinner Amount unknown best estimate $100

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part C Continuation Page

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Local Union & District Council Pension Fund

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

14 a Nature of payment

12/14/04 Local Union & District Council Pension Fund Board of Trustees Meeting Dinner

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment: $103

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Northern California Training Center Fund

Trade Name if any:

P O Box Bldg Room No if any:

Street: 1001 Westside Drive

City: San Ramon

State: California ZIP Code + 4: 94583 4099

14 a Nature of payment

October 2004 Two Northern California Training Center Fund shirts Amount unknown best estimate over $25

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment:

C **Received from any employer** (other than an employer covered under parts A and B above) or from any labor relations consultant to an employer any payment of money or other thing of value

13 a Name and address of Employer or Labor Relations Consultant (including trade name if any)

Name: Laborers/Employers Coop & Education Trust

Trade Name if any:

P O Box Bldg Room No if any:

Street: 905 16th Street N W

City: Washington

State: District of Columbia ZIP Code + 4: 20006 1703

14 a Nature of payment

4/6/2004 Pacific Southwest Regional Conference dinner for self and spouse Amount unknown best estimate $125 to $175

13 b Is the Business an Employer ☐ or Consultant ☐ ?

14 b Amount of payment:

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Palm Springs Riviera

Trade Name if any:

P O Box Bldg Room No if any:

Street: 1600 North Indian Canyon Drive

City: Palm Springs

State: California ZIP Code + 4: 92262 4602

9 Business deals with

- [X] a Labor Organization
- [ ] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name:

Trade Name if any:

P O Box Bldg Room No if any:

Street:

City:

State: ZIP Code + 4:

11 a Nature of such dealing

The Palm Springs Riviera Hotel provides hotel services to the Laborers International Union of North America

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

4/2/04 Pacific Southwest Regional Conference Wine cheese & fruit basket snacks and refreshments placed in hotel room Amount unknown best estimate $105

12 b Amount:

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name: Build Fund

Trade Name if any:

P O Box Bldg Room No if any: Suite 204

Street: 5455 Corporate Drive

City: Troy

State: Michigan ZIP Code + 4: 48098 2614

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name: [One or more benefit or trust funds

Trade Name if any: affiliated with LIUNA]

P O Box Bldg Room No if any:

Street:

City:

State: ZIP Code + 4:

11 a Nature of such dealing

The Build Fund provides financial services to one or more trusts of benefit funds affiliated with the Laborers International Union of North America

11 b Approximate dollar value of such dealing: unknown

12 a Nature of interest held or income received

3/9/04 Golf outing Amount unknown best estimate $55

12 b Amount

Name of Person Filing Rocco Davis	File Number U

Part B Continuation Page

B Held an interest in or derived income or economic benefit with monetary value **from a business** (1) a substantial part of which consists of buying from selling or leasing to or otherwise dealing with the business of an employer whose employees your labor organization represents or is actively seeking to represent or (2) any part of which consists of buying from or selling or leasing directly or indirectly to or otherwise dealing with your labor organization or with a trust in which your labor organization is interested

8 Name and address of Business (including trade name if any)

Name American Realty Advisors

Trade Name if any

P O Box Bldg Room No if any Suite 800

Street 801 North Brand Boulevard

City Glendale

State California ZIP Code + 4 91203 1261

9 Business deals with

- [ ] a Labor Organization
- [x] b Trust
- [ ] c Employer

10 If 9 b or 9 c is checked give trust or employer's name

Name [One or more trusts or benefit funds

Trade Name if any affiliated with LIUNA]

P O Box Bldg Room No if any

Street

City

State ZIP Code + 4

11 a Nature of such dealing

American Realty Advisors provides real estate broker services to one or trusts or benefit funds affiliated with the Laborers International Union of North America

11 b Approximate dollar value of such dealing unknown

12 a Nature of interest held or income received

8/26/04 Dinner for self and spouse Amount unknown best estimate $100

12 b Amount

Attachment 1 Form LM-30 Labor Organization Officer and Employee Report

ROCCO DAVIS
File Number U -
Laborers' International Union of North America, Organization File Number 000 -131
Fiscal Year Covered From 1/1/04 through 12/31/04

Page 14, Section 1
Part C

13(a)

It is my understanding that one of the National Tri-Funds (below) paid for the golf outing in ~~November~~ 2004 during the National Tri-Fund Board of Trustees Meetings
(RD) APRIL

(1) Laborers'-Employers Cooperation and Education Trust
905 16th Street, N W
Washington, D C 20006-1703

(2) Laborers Health & Safety Fund of North America
905 16th Street, N W
Washington, D C 20006-1703

Attachment 2 Form LM-30 Labor Organization Officer and Employee Report

ROCCO DAVIS
File Number U -
Laborers' International Union of North America, Organization File Number 000 -131
Fiscal Year Covered From 1/1/04 through 12/31/04

Page 22, Section 1
Part C

13(a)
It is my understanding that one of the National Tri-Funds paid for the dinner on November 15, 2004 during the National Tri-Fund Board of Trustees Meetings

The National Tri-Funds are

(1) Laborers'-Employers Cooperation and Education Trust
905 16th Street, N W
Washington, D C 20006-1703

(2) Laborers' Health & Safety Fund of North America
905 16th Street, N W
Washington, D C 20006-1703

(3) Laborers' - AGC Education and Training Fund
37 Deerfield Road
Pomfret Center, CT 06259-1405

Attachment 3 Form LM-30 Labor Organization Officer and Employee Report

ROCCO DAVIS
File Number U -
Laborers' International Union of North America, Organization File Number 000 -131
Fiscal Year Covered From 1/1/04 through 12/31/04

Page 22, Section 3
Part C

13(a)
It is my understanding that one of the National Tri-Funds paid for the dinner on November 16, 2004 during the National Tri-Fund Board of Trustees Meetings

The National Tri-Funds are

(1) Laborers'-Employers Cooperation and Education Trust
905 16th Street, N W
Washington, D C 20006-1703

(2) Laborers' Health & Safety Fund of North America
905 16th Street, N W
Washington, D C 20006-1703

(3) Laborers' - AGC Education and Training Fund
37 Deerfield Road
Pomfret Center, CT 06259-1405

Attachment 4 Form LM-30 Labor Organization Officer and Employee Report

ROCCO DAVIS
File Number U -
Laborers' International Union of North America, Organization File Number 000 -131
Fiscal Year Covered From 1/1/04 through 12/31/04

Page 23, Section 1
Part C

13(a)
It is my understanding that one of the National Tri-Funds (below) paid for the golf outing in November 2004 during the National Tri-Fund Board of Trustees Meetings

(1) Laborers'-Employers Cooperation and Education Trust
905 16th Street, N W
Washington, D C 20006-1703

(2) Laborers' Health & Safety Fund of North America
905 16th Street, N W
Washington, D C 20006-1703

Addenda to Form LM-30 Labor Organization Officer and Employee Report

ROCCO DAVIS
File Number U -
Laborers' International Union of North America, Organization File Number 000 -131
Fiscal Year Covered From 1/1/04 through 12/31/04

ADDENDUM A

On several occasions in 2004, particularly during holiday seasons, I recall that I was given complimentary items At no time did I solicit such items, and they were sent to my office without my prior knowledge or authorization I did not retain possession of any of these items, as I shared them with the individuals in my office My actions were in line with published Office of Government Ethics guidelines, which state, "When it is not practical to return a tangible item because it is perishable, the item may, at the discretion of the employee's supervisor or an agency ethics official, be given to an appropriate charity, shared within the recipient's office, or destroyed " 5 C F R 2635 205

ADDENDUM B

On several occasions in 2004 I recall complimentary gifts were sent without my request to my hotel room, such as a fruit basket, cheese basket, bottle of wine or spirits, etc I have no recollection or knowledge as to the value of the item, nor as to the purchaser or provider of such item

ADDENDUM C

I recall that I received unsolicited items at golf outings/tournaments, such as a sleeve of balls, a golf club or golf apparel, etc , in connection with a round of golf, which I have reported At no time did I solicit such an item, and I have no specific recollection of receipt of any such item, nor knowledge as to the value of the item

ADDENDUM D

It is conceivable that I received the benefit of a meal, refreshment, complimentary item or social event from an individual who may be employed by a reportable entity under the Labor-Management Reporting and Disclosure Act, which I did not report because I do not have any records of these encounters and have no specific recollection of any benefits received

ADDENDUM E

I am not reporting any benefits that I may have received from a political action committee ("PAC") My understanding is that PACs report all receipts and disbursements under the Federal Election Campaign Act, and I do not need to report under the Labor-Management Reporting and Disclosure Act

Addenda to Form LM-30 Labor Organization Officer and Employee Report

ROCCO DAVIS
File Number U -
Laborers' International Union of North America, Organization File Number 000 -131
Fiscal Year Covered From 1/1/04 through 12/31/04

ADDENDUM F

I am not reporting any benefits that I may have received in 2004 from labor organizations affiliated with the Laborers' International Union of North America ("LIUNA"), my employer, or other labor organizations My understanding of guidance received by the AFL-CIO from the Department of Labor is that benefits received from LIUNA-affiliated labor organizations and other labor organizations are not reportable on the LM-30 report, and I am following that guidance

Rocco Davis
Vice President at Large, Pacific Southwest Regional Manager
and Special Assistant to the General President
Laborers' International Union of North America
620 Sunbeam Avenue
Sacramento, CA 95814

August 15, 2005

U S Department of Labor
Employee Standards Administration
Office of Labor-Management Standards
200 Constitution Avenue NW
Room N-5616
Washington, D C 20210

Re **Form LM-30 Filing for Rocco Davis, U-**
Labor Organization File No 000 - 131

Dear Sir or Madam

Enclosed is my Labor Organization Officer and Employee Report LM-30 for the 2004 reporting period In filing the report, I have reviewed all of my available 2004 records as well as my recollection of benefits I may have received I have provided my best estimate or an estimated price range for the value of the benefit received where I have no knowledge as to an exact amount Further, in completing the LM-30 report, I have consulted with legal counsel and have obtained and have relied upon legal advice

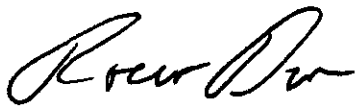
As you know, it was not until March of this year that the Department of Labor initially announced its intention to provide additional guidance to the reporting community concerning the LM-30 report, to seek systemic compliance with these requirements and to apply standards adopted in 2005 retroactively to 2004 as a base year in that effort Further, the Department since that time has continued to issue and revise its compliance advice, including guidance regarding related benefit funds My understanding is that the Department s guidance to date on LM-30 reporting is still changing and remains uncertain in various particulars

It may be possible that a covered employer or business not listed on my LM-30 report for 2004 provided something of value as to which I have no documentary record nor any present specific recollection In accordance with your guidance, it is my understanding that, in that circumstance, I am not required to take any further action

This filing reflects my good faith effort to comply with the LM-30 reporting provisions and in doing so, I have relied upon the advice of legal counsel and the evolving guidance from the Department The enclosed material represents my best recollection and estimate of all

lawfully reported benefits that I received in 2004 By reporting any items on this LM-30 Report, I do not concede that any of the items must be reported under 29 U S C 432, or that I did not receive such items within the provisions of 29 U S C 186(c)

Sincerely,



Rocco Davis

Enclosure