

**U.S. Department of Labor**

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July 3, 2008

Mr. Alan Skinner, President  
Steelworkers AFL-CIO  
Local 310  
125 NW Broadway  
Des Moines, IA 50313-4013

LM File Number 015-777

Case Number: [REDACTED]

Dear Mr. Skinner:

This office has recently completed an audit of Steelworkers Local 310 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 Financial Secretary Laurie Chapman and you on June 19, 2008, 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.

Reporting Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-2 filed by Local 310 for fiscal year ending December 31, 2007, was deficient in the following areas:

1. Dues/ Per Capita Tax

Steelworkers Local 310 incorrectly reported dues and per capita tax in Item 47 (From Members for Disbursement on Their Behalf) and Item 64 (On Behalf of Individual Members). Whether dues are collected by a check-off check from the employer or received individually by a local member, this total amount should be reported in Item 36 (Dues and Agency Fees). Likewise, the per capita tax paid as a requirement of affiliation with your International Union should be reported in Item 56 (Per Capita Tax). Item 47 and Item 64 are for monies received from

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members to be distributed on their behalf; for example, contributions from members for transmittal by the labor organization to a charity.

2. Disbursements to Officers

Steelworkers Local 310 did not include reimbursements for President Alan Skinner's cellular phone totaling \$1,168.64 in Schedule 11 (All Officers and Disbursements to Officers) Column F (Disbursements for Official Business). It appears the union erroneously reported these payments in Schedule 18 (General Overhead).

The union must report in Column F of Schedules 11 and 12 (Disbursements for Official Business) direct disbursements to officers and employees for reimbursement of expenses they incurred while conducting union business. In addition, the union must report in Column F of Schedules 11 and 12 indirect disbursements made to another party (such as a credit card company) for business expenses union personnel incur. However, the union must report in Schedules 15 through 19 indirect disbursements for business expenses union personnel incur for transportation by public carrier (such as an airline) and for temporary lodging expenses while traveling on union business. The union must report in Column G (Other Disbursements) of Schedules 11 and 12 any direct or indirect disbursements to union personnel for expenses not necessary for conducting union business.

I am not requiring that Steelworkers Local 310 file an amended LM report for 2007 to correct the deficient items, but Local 310 has agreed to properly report the deficient items on all future reports it files with OLMS.

I want to extend my personal appreciation to Steelworkers Local 310 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

cc: Laurie Chapman, Financial Secretary