

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
New Haven Resident Investigative Office  
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June 25, 2009

Mr. George Strutt, Secretary-Treasurer  
Boilermakers AFL-CIO  
Local Lodge 614  
33 Sacred Heart Drive  
Groton, CT 06340-4394

LM File Number 011-690  
Case Number: [REDACTED]

Dear Mr. Strutt:

This office has recently completed an audit of Boilermakers LL 614 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, Business Manager Frank Ward, and Office Manager Lucy Bright on Thursday, June 18, 2009, 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 violations of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The LM-3 filed by Local Lodge 614 for the fiscal year ending June 30, 2008 was deficient in the following areas:

1. Question #20

Local 614 is currently carrying a surety bond, obtained through the Boilermakers International, in the amount of \$60,000. LL 614 answered question 20 (What is the maximum amount recoverable under your organization's fidelity bond, for a

loss caused by any officer or employee of your organization?) "\$500,000". This question was also answered with "\$500,000" in the previous two years, but the local's bond was smaller in those years as well. This question should be answered correctly.

2. Disbursements to Officers (LM-3)

Local Lodge 614 did not include some reimbursements to officers totaling \$332.40 to President James Papa, \$290 to Chief Steward John Adamson, and \$255 to Business Manager Frank Ward. These were checks paid directly to these officers, as reimbursements for travel expenses.

The union must report most direct disbursements to local officers and some indirect disbursements made on behalf of its officers in Item 24. A "direct disbursement" to an officer is a payment made to an officer in the form of cash, property, goods, services, or other thing of value. See the instructions for Item 24 for a discussion of certain direct disbursements to officers that do not have to be reported in Item 24. An "indirect disbursement" to an officer is a payment to another party (including a credit card company) for cash, property, goods, services, or other things of value received by or on behalf of an officer. However, indirect disbursements for temporary lodging (such as a union check to a hotel) or for transportation by a public carrier (such as an airline) for an officer traveling on union business should be reported in Item 48

I am not requiring that Local Lodge 614 file an amended LM-3 report for 6/30/2008 to correct the deficient items, but Local Lodge 614 has agreed to properly report the deficient items on all future reports with OLMS.

I want to extend my personal appreciation to Boilermakers LL 614 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

Mr. George Strutt  
June 25, 2009  
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cc: James Papa, President  
Timothy Ashburner, CPA