

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Philadelphia District Office
170 S. Independence Mall West
Room 760
Philadelphia, PA 19106
(215)861-4818 Fax: (215)861-4819



March 27, 2008

Mr. Rodney Ralph, Financial-Secretary
Glass Molders Plastics AFL-CIO
Local Union 304B
16 Jackson Street
Wellsboro, PA 16901

LM File Number 004-800
Case Number: [REDACTED]

Dear Mr. Ralph:

This office has recently completed an audit of GMP Local 304B 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 Claude Christman on March 6, 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 Violation

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 LM-3 filed by Local 304B for fiscal year ending October 31, 2007, was deficient in that:

Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. Local 304B amended its constitution and bylaws in 2003, but did not file a copy with its LM report for that year.

Local 304B has now filed a copy of its constitution and bylaws.

I am not requiring that Local 304B file an amended LM report for 2007 to correct the deficient item, but Local 304B has agreed to properly report the deficient item on all future reports it files with OLMS.

Other Issue

Expense Policy

As I discussed during the exit interview with you and Claude Christman, the audit revealed that Local 304B does not have a clear policy regarding the types of expenses personnel may claim for reimbursement. OLMS recommends that unions adopt written guidelines concerning such matters.

I want to extend my personal appreciation to GMP Local 304B 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: Secretary-Treasurer Claude Christman