

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
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June 22, 2007

Mr. Robert Wilcox, Secretary Treasurer
Boilermakers AFL-CIO
Lodge 1255
37971 N. Watts Ave.
Spring Grove, IL 60081

LM File Number 068-125
Case Number: [REDACTED]

Dear Mr. Wilcox:

This office has recently completed an audit of Boilermakers Lodge 1255 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 on June 14, 2007, 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.

Recordkeeping Violations

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records for at least five years by which each receipt and disbursement of funds, as well as all account balances, can be verified, explained, and clarified. As a general rule, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers, and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing the additional information. For money it receives, the labor

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organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of Lodge's 1255's 2006 records revealed the following recordkeeping violation:

General Expenses

Lodge 1255 did not retain adequate documentation to confirm general expenses incurred by the union totaling at least \$2,000.00. For example, the union issued several checks to the Holiday Inn and did not maintain invoices. In addition, a \$1,000.00 check for a hurricane relief donation similarly failed to have any supporting documentation.

As previously noted above, labor organizations must retain original receipts, bills, invoices and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

Based on your assurance that Lodge 1255 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violation.

I want to extend my personal appreciation to Boilermakers Lodge 1255 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: Oscar Orellana