



November 5, 2020

Mr. Luke Turner, Secretary Treasurer
Boilermakers Lodge 114-D
14729 CR 3582
Ada, OK 74820

Case Number: 420-6019878
LM Number: 030016

Dear Mr. Turner:

This office has recently completed an audit of Boilermakers Lodge (LG) 114-D 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 President John Bell on October 30, 2020, 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 Violation

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 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 Boilermakers LG 114-D's 2020 records revealed the following recordkeeping violation:

Tax and Rental Hall Expenses

Boilermakers LG 114-D did not retain adequate documentation for tax and rental hall expenses totaling at least \$607.84.

As noted above, labor organizations must retain original receipts, bills, 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 Boilermakers LG 114-D will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

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-3 filed by Boilermakers LG 114-D for the fiscal year ended June 30, 2020, was deficient in the following areas:

1. 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. Boilermakers LG 114-D amended its constitution and bylaws in 2010, but did not file a copy with its LM report for that year.

Boilermakers LG 114-D has now filed a copy of its constitution and bylaws.

2. Per Capita Tax Payments

Lodge 114-D reported per capita tax payments totaling at least \$1,219.40 in Item 54 Other Disbursements. Those disbursements should have been reported on Item 48 Per Capita Tax.

3. Officer Salaries

Lodge 114-D reported net salary amounts for President Chad Lovelace, Former President John Bell, Secretary Treasurer Luke Turner, and Recording Secretary Justin Roberts in Item 24. Gross salary amounts should have been reported.

Boilermakers LG 114-D must file an amended Form LM-3 for the fiscal year ended June 30, 2020, to correct the deficient items discussed above. The report must be filed electronically using the Electronic Forms System (EFS) available at the OLMS website at www.olms.dol.gov. The amended Form LM-3 must be filed no later than November 18, 2020. Before filing, review the report thoroughly to be sure it is complete and accurate.

I want to extend my personal appreciation to Boilermakers LG 114-D 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: Mr. John Bell, President
Mr. Chad Staubuf, Vice President
Mr. Justin Roberts, Recording Secretary
Mr. Roy Roberts, Trustee
Mr. William Ensey, Trustee
Mr. Thomas Ensey, Trustee