

U.S. Department of Labor

Office of Labor-Management Standards
New York District Office
201 Varick Street, Suite 878
New York, NY 10014
(646) 264-3190 Fax: (646) 264-3191



July 20, 2021

John T. Oates, President
International Security Officers, Police & Guards Union
Broadway
Bayonne, NJ 07002

Case Number: 130-6020991()
LM Number: 000288

Dear John Oates:

This office has recently completed an audit of International Security Officers, Police & Guards Union (ISOPGU) 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 24, 2021, 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-3) filed by ISOPGU for the fiscal year ended December 31, 2020, was deficient in that the union did not have required bonding coverage, in violation of 29 U.S.C. 502(a) of the LMRDA. ISOPGU annotated on its fiscal year ending December 31, 2020 Form LM-3 bonding coverage of \$25,000. The investigation disclosed that ISOPGU does not have any bonding coverage. ISOPGU provided to OLMS a copy of an "ERISA Dishonesty Bond" for \$100,000. The ERISA Dishonesty Bond is specific in providing coverage for the ISOPGU Employee Benefit Plan. The union is required to obtain by July 30, 2021, acceptable bonding coverage of at least \$10,000. No further enforcement action will be taken if ISOPGU obtains the acceptable bonding coverage for the union. An amended FY2020 Form LM-3 was electronically filed on June 24, 2021 reflecting that the union had no bonding coverage.

Other Violations

The audit disclosed the following other violation. ISOPGU, as the parent body, failed to hold its last regular election of officers within the maximum time frame specified by the LMRDA, in violation of 29 U.S.C. 481(a). ISOPGU held its last regular election of officers in June 2015. The election that was scheduled to be held in June 2020 was not conducted. ISOPGU President John T. Oates promised to conduct the outstanding ISOPGU election of officers in 2021. Its subordinate local union, ISOPGU Local 1456, must first conduct an election of Delegates. The Local 1456 delegates are the voters in the ISOPGU officer election.

Enclosed is a copy of the LMRDA and our publication entitled Conducting Local Union Officer Elections – A Guide for Election Officials. I call your attention to Title IV of the LMRDA – Elections Terms of Office; Election Procedures Section 401(a) which provides that every National or International labor organization shall elect its officers not less often than once every five years by secret ballot among the members in good standing or at a convention of delegates chosen by secret ballot.

I want to extend my personal appreciation to International Security Officers, Police & Guards Union 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,

A solid black rectangular box used to redact the signature of the investigator.

Investigator