

**U.S. Department of Labor**

Office of Labor-Management Standards  
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September 29, 2025

Mr. TamonDrick Burroughs, Financial Secretary  
United Steelworkers Local 1153  
416 Acreview Drive  
Highland Springs, VA 23075

Case Number: 450-6030756( )  
LM Number: 070041

Dear Mr. Burroughs:

This office has recently completed an audit of United Steelworkers Local 1153 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 President Jeremy Holiday and you on September 23, 2025, 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 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 Local 1153's 2024 records revealed the following recordkeeping violations:

1. General Reimbursed Expenses

Local 1153 did not retain adequate documentation for some reimbursed expenses incurred by union officers. For example, the union failed to maintain any receipts documenting officers travel to the 2024 National Paper Bargaining Conference.

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.

2. Lost Wages

Local 1153 did not retain adequate documentation for lost wage reimbursement payments to some union officers. The union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the number of hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS audit found that Local 1153 did not have sufficient records to support the applicable rate of pay in that it was unclear why one officer received two different rates of pay for lost time and why officers were paid at the overtime rate for some of their lost time.

3. Information not Recorded in Meeting Minutes

During the audit, the officers advised OLMS that the membership authorized expenses at membership meetings. However, there are no meeting minutes or other union records for a few of those meetings. Minutes of all membership or executive board meetings must report any disbursement authorizations made at those meetings.

4. Lack of Salary Authorization

Local 1153 did not maintain records to verify that the salaries reported in Item 24 (All Officer and Disbursements to Officers) of the LM-3 were the authorized amount and therefore were correctly reported. The union must keep a record, such as meeting minutes, to show the current salary authorized by the entity or individual in the union with the authority to establish salaries.

Based on your assurance that Local 1153 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 Local 1153 for the fiscal year ended December 31, 2024, was deficient in the following areas:

Disbursements to Officers

Local 1153 did not properly report the salary for one union officer in Column D (Gross Salary) of Item 24 (All Officers and Disbursements to Officers). It appears that the union

erroneously reported some of the payments that should have been reported in Column E (Allowances and Other Disbursements) of Item 24 in Column D.

I want to extend my personal appreciation to United Steelworkers Local 1153 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 black rectangular box redacting the signature of the investigator.

Investigator

cc: Mr. Jeremy Holiday, President