

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management  
Standards  
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October 15, 2007

Mr. David Corrigan, Treasurer  
Concrete Vault and Sewage System  
Installers of Valley City  
1856 Abbeyville Road  
Valley City, OH 44280-9528

Re: Case Number [REDACTED]

Dear Mr. Corrigan:

This office has recently completed an audit of Concrete Vault and Sewage System Installers of Valley City 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 October 9, 2007 the following problem was disclosed during the CAP. The matter listed below is 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.

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The audit of the Concrete Vault and Sewage System Installers, 2006 records revealed the following recordkeeping violation:

Concrete Vault and Sewage System Installers were unable to produce union meeting minutes for the time period audited. It was reported to Investigators that former Recording-Secretary Michael S. Walters left office and was terminated from employment with MACK Industries. Walters failed to return union records.

Based on your assurance that the union 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 the Concrete Vault and Sewage System Installers of Valley City 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,

Fred Vaudrin  
District Director

cc: Tom Birchfield