

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
St. Louis District Office  
1222 Spruce Street  
Room 9 109E  
St. Louis, MO 63103  
(314)539-2667 Fax: (314)539-2626



March 25, 2008

Mr. Charles Kaemmerer, Financial Secretary  
Glass Molders Plastics AFL-CIO  
Local 182-B  
1801 S. 11th Street Road  
Belleville, IL 62226

LM File Number 036-164  
Case Number: [REDACTED]

Dear Mr. Kaemmerer:

This office has recently completed an audit of 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 March 7, 2008, 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 182-B's 2007 records revealed the following recordkeeping violations:

1. Did Not Retain Adequate Documentation for Expenses

Local 182-B did not retain adequate documentation for expenses incurred by union officers totaling at least \$2,600. For example, the local did not retain receipts for officer travel including hotel, airfare, rental car, and mileage expenses.

As previously 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. Refreshment Expenses

Local 182-B's records for refreshment expenses did not always include written explanations of union business conducted or the names and titles of the persons incurring the charges. For example, over \$280 worth of beer and soda were purchased for meetings. Receipts were retained, but no explanation was provided for the purchases. Union records of meal/refreshment expenses must include written explanations of the union business conducted.

3. Lost Wages

Local 182-B did not retain adequate documentation for lost wage reimbursement payments to Michael Keck, Charles Kaemmerer, Dave Chaffee, and Terry Betts totaling at least \$600 for Michael Keck, \$2,082 for Charles Kaemmerer, \$13.23 for Dave Chaffee, and \$805.28 for Terry Betts. 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

Mr. Charles Kaemmerer  
March 25, 2008  
Page 3 of 3

the union business conducted. The OLMS audit found that Local 182-B did not retain adequate documentation and, in some cases, no documentation at all.

Based on your assurance that Local 182-B will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

I want to extend my personal appreciation to you 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: Michael Keck, President