



March 31, 2014

Mrs. Mary Adkins, Treasurer
UAW Local 282
3460 Hollenberg Dr.
Suite 200
Bridgeton, MO 63044

Case Number: 510-6000708 [REDACTED]
LM Number: 020066

Dear Mrs. Adkins:

This office has recently completed an audit of UAW Local 282 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 Recording Secretary Bill Hugeback on March 24, 2014, 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 282's 2013 records revealed the following recordkeeping violations:

1. General Union Expenses

Local 282 did not retain adequate documentation for expenses incurred by the union totaling at least \$1,404.24. For example, the local did not maintain a receipt or invoice for two airline tickets purchased by debit card from Southwest Airlines on January 30, 2013 for a total of \$499.60 and for two airline tickets purchased by debit card from Southwest

Airlines on February 25, 2013, for a total of \$469.60. In addition, the local did not maintain a receipt or invoice for an airline ticket purchased by debit card from Delta Airlines on September 12, 2013 for \$213.88, and for a debit payment to Hilton Garden Hotel, Detroit, Michigan on March 21, 2013 for \$221.16.

On August 14, 2013, Recording Secretary Bill Hugeback was reimbursed \$506.50 for a parade entrance fee, veteran's conference, and for airfare and lodging. The local did not maintain adequate documentation to support this disbursement as there was no receipt or invoice for the airfare and lodging located. In addition, on September 20, 2013, Hugeback was reimbursed \$100 by the union for expenses. The union did not maintain a record explaining and clarifying the reimbursement.

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 282 did not retain adequate documentation for lost wage reimbursement payments to Vice President Mike Mendehall on four separate occasions. The union must maintain records in support of lost wage claims that identify each date lost wages were incurred, the hours lost on each date, the applicable rate of pay, and a description of the union business conducted. The OLMS audit found that Local 282 provided vouchers where the date lost wages occurred, the hours lost, and the pay rate were completed; however, on four occasions Mendehall failed to report the specific hours lost. On one occasion, Mendehall did not report the date(s) he incurred lost time.

Local 282's lost time voucher is adequate to meet the recording keeping requirements of the LMRDA only if all the required information is completed on the form.

Based on your assurance that Local 282 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 UAW Local 282 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