



February 1, 2016

Mr. Casey Bobak, President  
LIUNA Local 288  
660 E. North Avenue  
Lombard, IL 60148

Case Number: 310-6000615 [REDACTED]  
LM Number: 017038

Dear Mr. Bobak:

This office has recently completed an audit of LIUNA Local 288 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 Vice President Michael Van Wagner on November 19, 2015, 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. During subsequent telephone contacts with you and Mr. Van Wagner, we further discussed that the Labor Organization Annual Report Form LM-2 filed by Local 288 for the fiscal year ending November 1, 2014, was deficient in that it failed to include payments to local employees in Schedule 12 (Disbursements to Employees).

#### 1. Disbursements to Officers and Employees (LM-2)

Local 288 did not include some reimbursements to officers and employees / payments to officers and employees totaling at least \$15,000 in Schedule 11 (All Officers and Disbursements to Officers) and Schedule 12 (Disbursements to Employees). It appears that the local erroneously reported these payments in Schedules 15 through 19.

The union must report in Column F of Schedules 11 (Disbursements for Official Business) and 12 (Disbursements for Official Business) direct disbursements to officers and employees for reimbursement of expenses they incurred while conducting union business. In addition, the union must report in Column F of Schedules 11 and 12 indirect disbursements made to another party (such as a credit card company) for business expenses union personnel incur. However, the union must report in Schedules 15 through 19 indirect disbursements for business expenses union personnel incur for transportation by public carrier (such as an airline) and for temporary lodging expenses while traveling on union business. The union must report in Column G (Other Disbursements) of Schedules 11 and

12 any direct or indirect disbursements to union personnel for expenses not necessary for conducting union business.

As was discussed, Local 288 typically employs Local 288 members to conduct picketing of non-signatory employers. On the Local 288 LM-2 Report for fiscal year ending November 1, 2014, Local 288 erroneously listed three picketers and related disbursements to them on Schedule 15 (Representational Activities).

On November 1, 2014, Local 288 was merged with LIUNA Local 96 to form LIUNA Local 68. Since Local 288 no longer exists an amended report will not be required.

I want to extend my personal appreciation to LIUNA Local 288 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