



May 23, 2017

Mr. Glendon Shimp, Financial Secretary-Treasurer
Glass Molders and Plastics Local 157
142 Georgia Road
Pennsville, NJ 08070

Case Number: 130-6009430
LM Number: 034646

Dear Mr. Shimp:

This office has recently completed an audit of Glass Molders and Plastics Local 157 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 May 22, 2017, 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. The Labor Organization Annual Report (Form LM-3) filed by GMP Local 157 for the fiscal year ended October 31, 2015, was deficient in the following areas.

1. Delinquent LM filing

Your union's required LM report for FYE October 31, 2015 was not filed within 90 days after the end of your union's fiscal year.

The required LM report has been filed and Local 157 has agreed to file future reports within the required timeframe.

2. Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its constitution and bylaws with OLMS. GMP Local 157 has not submitted a copy of its bylaws with OLMS.

Local 157 has filed a copy of its current bylaws with OLMS.

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 157's 2015 records revealed the following recordkeeping violations:

1. Information not Recorded in Meeting Minutes

According to Local 157's bylaws, during each membership meeting there should be a reading of prior meeting minutes, bills, a financial report and other information. However, Local 157 maintained minimal or no meeting minutes. Minutes of all membership or executive board meetings must report any disbursement authorizations made at those meetings.

Based on your assurance that Local 157 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 Glass Molders and Plastics Local 157 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