

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
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Steven Brant, Secretary Treasurer
Locomotive Engineers AFL-CIO
Division 186
15361 E 8th Ave
Aurora, CO 80011

08/10/05

Re: / 2

Dear Mr. Brant:

This office has recently completed an audit of Locomotive Engineers Division 186 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 Steven Brant on August 10, 2005, 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.

Adequate documentation was not retained for some purchases of office supplies and other miscellaneous supplies. In the future it is important to keep documentation on all disbursements from the large to even the smallest of disbursements. I will not require Division 186 to file an amended LM-3 report for the fiscal year ending December 31, 2004. As agreed, provided that Division 186 maintain adequate documentation for its disbursements in the future, no additional enforcement action will be taken regarding this violation.

The proper maintenance of union records is the personal responsibility of the individuals who are required to file Division 186's LM report. You should be aware that section 206 of the LMRDA provides that records be available for a period of not less than 5 years.

I strongly recommend that you make sure that this letter and the compliance assistance materials that were provided to you are passed on to your successors at whatever time you may leave office. I want to thank Steven Brant as well as Division 186 for their cooperation and courtesy during this compliance audit. If we can be of any assistance in the future, please do not hesitate to contact me or any other representative of our office.

Sincerely,

FCCS

Investigator