

**U.S. Department of Labor**

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April 9, 2008

Mr. Kenneth Ferguson  
Secretary-Treasurer  
Laborers Local 1084  
303 Berry Street  
Hillsboro, IL 62049

LM File Number 024-445  
Case Number: [REDACTED]

Dear Mr. Ferguson:

This office has recently completed an audit of Laborers Local 1084 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 Business Manager Jerry Thacker on January 15, 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 1084's 2007 records revealed the following recordkeeping violation:

#### General Reimbursed and Credit Card Expenses

Local 1084 did not retain adequate documentation for reimbursed expenses and credit card expenses incurred by union officers totaling at least \$1,600. For example, a Dell computer and printer were purchased online with the local's Union Plus MasterCard on May 25, 2007, and back-up documentation was not maintained.

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. During the exit interview, you agreed to maintain all back-up documentation in the future.

I want to extend my personal appreciation to Laborers Local 1084 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: Jerry Thacker, Business Manager