



March 26, 2015

Jeff Daily, Financial Secretary
GMP Local 178
24 W 12th St. Lot 1206
Dresden, OH 43821

Case Number: 350-6003486()
LM Number: 034644

Dear Jeff Daily:

This office has recently completed an audit of GMP Local 178 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 President Tom Forker on February 11, 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

1. Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. Local 178 amended its constitution and bylaws in 2007, but did not file a copy with its LM report for that year.

Local 178 has now filed a copy of its constitution and bylaws.

2. Salary of Employee

Local 178 does not report payments to the death benefit counselor as salary, but as an expense. In future, report these payments as a salary to employees under item 46 of the LM -3 report.

I am not requiring that Local 178 file an amended LM report for 2014 to correct the deficient items, but Local 178 has agreed to properly report the deficient items on all future reports it files with OLMS.

Other Issues

Salary Authorization

The union must keep a record which establishes the current salary levels for union officers. Authorization was not found in the records provided during the audit; therefore it is recommended that the union reestablish the current authorization of salary levels in the local's bylaws or meeting minutes.

I want to extend my personal appreciation to GMP Local 178 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: Tom Forker, President