

## U.S. Department of Labor

Employment Standards Administration  
Office of Labor-Management Standards  
Chicago District Office  
230 S. Dearborn Street, Suite 774  
Chicago, Illinois 60604  
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September 27, 2005

Steven Peterson  
Business Representative  
Roofers AFL-CIO  
Local Union 69  
3917 S.W. Adams  
Peoria, Illinois 61605-3162

OLMS Case Number

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Dear Mr. Peterson,

This office has recently completed an audit of Roofers AFL-CIO Local 69 under the compliance Audit Program (CAP). The audit was conducted to determine your organization's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA).

As we discussed during the exit interview on July 29, 2005, the following problem areas were disclosed during the CAP. The matters listed below are not an exhaustive list of possible areas since the audit conducted was limited in scope. The CAP disclosed the following record keeping and reporting violations of Title II of the LMRDA, specifically section 201(b) and Section 206.

#### Record Keeping Violation

Local 69 failed to maintain any type of mileage log. Although, the vehicle in question is your personal vehicle used for union business, some type of log should be maintained to differentiate between business and personal use. During the exit interview you agreed to begin maintaining mileage records.

#### Reporting Violations

Local 69 failed to provide an updated copy of its bylaws to OLMS. However, this violation was resolved during the audit, when Local 69 provided an updated version of the bylaws.

Roofers Local 69  
CAP Closing letter  
September 13, 2005

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In addition, Local 69's fiscal year ending 12/31/2004 LM-2 report was deficient for the following reasons:

Items 33(c) through 37 (c) (Liability items-start of reporting period) must be the same as the entries in items 33 (D) through 37 (D) (liability-end of reporting period) on your union's prior year Form LM-2 or an adequate explanation must be provided in Item 75 (additional information). Item 37 (c) for the FYE 12/31/2004 report shows \$1611. However, the amount from the previous years FYE 12/31/2003 Item 37 (D) shows \$1812.

Item 38 (C) (net-assets-start of reporting period) must be the same as the entry in Item 38(D) (net assets-end of reporting period) on your union's prior year Form LM-2 or an explanation must be provided in Item 75 (additional information). The FYE 12/31/2004 LM-2 report shows \$160,929 while the prior years ending shows \$160,635 a difference of \$294.00.

Schedule 15, column A, line one shows \$2,650 in other withholdings. This line must be completed with an adequate description of the type of disbursement.

Finally, Local 69 failed to complete items 76 and 77 the office telephone number.

Local 69 has agreed to correct all record keeping and reporting violations. The Local will amend its fiscal year 12/31/2004 LM-2 report correcting each item cited. I would like to thank you and your staff for your cooperation and courtesy during the compliance audit. If I can be of any assistance in the future, please do not hesitate to call.

Sincerely,

7(c)

Investigator  
U.S. Department of Labor