

**U.S. Department of Labor**

Employment Standards Administration  
Office of Labor-Management Standards  
Philadelphia District Office  
170 S. Independence Mall West  
Room 760 W  
Philadelphia, PA 19106  
(215)861-4818 Fax: (215)861-4819



June 18, 2009

Mr. Wayne Crawford, Financial-Secretary  
Brotherhood of Railroad Signalmen AFL-CIO  
Local Lodge 53  
4012 Albermarle Avenue  
Drexel Hill, PA 19026

Re: Case Number: [REDACTED]

Dear Mr. Crawford:

This office has recently completed an audit of Railroad Signalmen Lodge 53 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 June 16, 2009, 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.

The CAP disclosed the following:

**Signing Blank Checks**

During the audit, you advised that Recording-Secretary Steve Ehmann signs blank checks. Your union requires that all checks be signed and counter-signed by two union officials. The two signature requirement is an effective internal control of union funds. Its purpose is to attest to the authenticity of a completed document already signed. However, signing a blank check in advance does not attest to the authenticity of a completed check, and negates the purpose of the two signature requirement. OLMS recommends that Local 53 review these procedures to improve internal control of union funds.

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I want to extend my personal appreciation to Railroad Signalmen Lodge 53 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: Recording Secretary Steve Ehmman  
President Ronald Griffiths