

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Seattle District Office
1111 Third Avenue
Suite 605
Seattle, WA 98101
(206) 398-8099 Fax:(206) 398-8090



January 9, 2009

Mr. Brian Deans, Financial Secretary-Treasurer
Carpenters IND Local 1715
612 East McLoughlin Blvd.
Vancouver, WA 98663

LM File Number: 040-202
Case Number: [REDACTED]

Dear Mr. Deans:

This office has recently completed an audit of Carpenters IND Local 1715 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 November 21, 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 1715's fiscal year ending 2008 records revealed the following recordkeeping violations:

Disposition of Property

Local 1715 did not maintain an inventory of shirts and tools ("plumb bobs" and "pea shooters") it sold or gave away. Local 1715 was unable to account for 172 shirts; ranging in value from \$10.01 to \$17.40 each and 26 sets of plumb bobs with a purchase value of \$20.50 per set, for a grand total of missing receipts ranging from \$2,254.72 - \$3,535.80. The union must report the value of any union property on hand at the beginning and end of each year in Item 28 of the LM-2. The union must retain an inventory or similar record of property on hand to verify, clarify, and explain the information that must be reported in Item 28.

The union must record in at least one record the date and amount received from each sale of union shirts and other items.

Based on your assurance that Local 1715 will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Reporting Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-2 filed by Local 1715 for fiscal year ending 2008, was deficient in the following area:

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 1715 amended its constitution and bylaws in 2003, but did not file a copy with its LM report for that year.

Local 1715 has now filed a copy of its constitution and bylaws.

I want to extend my personal appreciation to Carpenters IND 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,



Investigative Supervisor

cc: Mr. Bruce Ashback, President