

U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
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April 11, 2008

Mr. William Banfield, President
United Brotherhood of Carpenters and Joiners of America (UBCJA)
Local 11
14 Saw Mill River Road
Hawthorne, NY 10532

LM File Number 541-134
Case Number: [REDACTED]

Dear Mr. Banfield:

This office has recently completed an audit of Carpenters Local 11 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 Ed Cooke and Kris Komorowski on April 10, 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.

The CAP disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its constitution and bylaws with its LM-1 report. A copy of Local 11's constitution and bylaws has now been filed.

The CAP also 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 11 for fiscal year ending June 30, 2007 was deficient in that:

Local 11 did not maintain an inventory of hats, jackets, fixed assets and other property it purchased, sold, or gave away. 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 hats, jackets and other items. In addition, the union must retain records that adequately account for all property purchased, sold, and given away.

Local 11 must file an amended Form LM-2 for fiscal year ending June 30, 2007, to correct the deficient item discussed above. I explained to you the filing procedures and the availability of the filing software on the OLMS website (www.olms.dol.gov). The amended Form LM-2 must be electronically filed as soon as possible, but not later than May 15, 2008. Before filing, review the report thoroughly to be sure it is complete and accurate, and properly signed with electronic signatures.

I want to extend my personal appreciation to Carpenters Local 11 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: Ed Cooke, Recording Secretary
Kris Komorowski, Financial Secretary