

**U.S. Department of Labor**

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January 9, 2009

Mr. Tom Pfeifer, Financial Secretary/Treasurer  
Auto Workers Local 1415  
6650 E. Arizona Ave #114  
Denver, CO 80224

LM File Number: 064-485  
Case Number: [REDACTED]

Dear Mr. Pfeifer:

This office has recently completed an audit of Auto Workers Local 1415 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 December 23, 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.

Reporting Violations

The audit disclosed violations 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-3 filed by Local 1415 for fiscal year ending December 31, 2007, was deficient in the following areas:

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 1415 amended its constitution and bylaws in 1991, but did not file a copy with its LM report for that year.

Local 1415 has now filed a copy of its constitution and bylaws.

2. Disbursements to Officers

Local 1415 reported some payments to officers in Column (E) that should have been included in Column (D). The union should report in Column (D) the gross salary of each officer, including disbursements for lost time or time devoted to union activities. Column (E) should include the total of all other direct and indirect disbursements to each officer other than salary.

I am not requiring that Local 1415 file an amended LM report for 2007 to correct the deficient items, but Local 1415 has agreed to properly report the deficient items on all future reports it files with OLMS.

I want to extend my personal appreciation to Auto Workers Local 1415 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,

Jena de Mers Raney  
District Director

cc: Jeff Zahn, President