



May 15, 2023

Mynor Perez, President
Carpenters, Local 2168
750 Dorchester Ave.
Boston, MA 02125

Case Number: 110-6025369()
LM Number: 030-470

Dear Mr. Perez:

This office has recently completed an audit of Carpenters, Local 2168 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 and Bookkeeper Janice Murphy on April 28, 2023, 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 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 2168 for the fiscal year ended June 30, 2022, was deficient in the following areas:

1. PAC Fund Reporting (Item 11)

Item 11 (During the reporting period did your organization have a political action committee (PAC) fund?) was correctly answered, "Yes." Local 2168 had its own PAC fund during 2022. However, the LM-2 report instructions require that certain additional information be included in Item 69 when Item 11(a) is answered "Yes," which was not included, specifically, the file number of your PAC fund.

2. Failure to Report "Less Deductions" on Schedules 11 and 12

Local 2168 did not report the total amount of withheld taxes, payroll deductions, and all other deductions, withheld from officers and employees in "Less Deductions" on Schedules 11 (All Officers and Disbursements to Officers) and 12 (Disbursements to Employees). The union must report on Schedule 11 and Schedule 12, the total amount of withheld taxes, payroll deductions, and all other deductions.

3. 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 2168 amended its bylaws in 2016 but did not file a copy with its LM report that year or in the following years.

Local 2168 has now filed a copy of its constitution and bylaws.

I am not requiring that Local 2168 file an amended LM report for 2022 to correct the deficient items, but Local 2168 has agreed to properly report the deficient items on all future reports it files with OLMS.

I want to extend my personal appreciation to Carpenters, Local 2168 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: Janice Murphy, Bookkeeper