



February 12, 2018

Case Number: 530-6012197 [REDACTED]
LM Number: 039871

Mr. Daniel Branton, Financial Secretary
Carpenters Local 109
4421 Pell Drive
Sacramento, CA 95838

Dear Mr. Branton:

This office has recently completed an audit of Carpenters Local 109 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 with your union's attorney, Matt Guager, on January 30, 2018, the following problem was disclosed during the CAP. The matter listed below is not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

Reporting Violation

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 Carpenters Local 109 for the fiscal year ended June 30, 2017, 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 bylaws with its LM report when it makes changes to its constitution or bylaws. Carpenters Local 109 amended its June 30, 1980 bylaws, but did not file a copy with its LM report.

Carpenters Local 109 has now filed a copy of its current bylaws.

I want to extend my personal appreciation to Carpenters Local 109 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,

[REDACTED]
Investigator

CC: Attorney Matt Guager