

REPORTS ANALYSIS DIVISION REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: August 7, 2015

ANALYST: Kevin Fortkiewicz

I. COMMITTEE:

Southwest Regional Council of
Carpenters Legislative Improvement
Cmte United Brotherhood of Carpenters
& Joiners of America
C00285593
Randy Thornhill, Treasurer
555 Capitol Mall, Suite 1425
Sacramento, CA 95814

II. RELEVANT STATUTE:

52 U.S.C. §30104(b)(2)
11 CFR § 104.3(a)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America ("the Committee") amended its 2014 August Monthly Report to disclose additional receipts of \$226,932.34 that were not disclosed in the original report (Attachment 2).

On August 20, 2014, the Committee filed the original 2014 August Monthly Report covering the period from July 1, 2014 through July 31, 2014. The report disclosed \$0.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 14950080451).

On September 19, 2014, the Committee filed an Amended 2014 August Monthly Report. The report disclosed \$226,932.34 in receipts on Line 11(a)(ii) of the Detailed

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On November 25, 2014, the RAD Analyst called Ms. Andrews to further discuss who could be the point of contact for referable matters. The RAD Analyst left a message stating that the Treasurer would always be contacted first unless the Treasurer states

otherwise. On the same day, Ms. Andrews called back and left a message with the name, address, and phone number of the contact person she would like the Commission to use when they initiate contact regarding the progression of the potential referable issue in the future (Attachment 3).

On May 6, 2015, a RAD Manager called Richard Rios, counsel for the Committee, regarding the increase in activity disclosed on the Committee's Amended 2014 August Monthly Report, received September 19, 2014,

On May 7, 2015, Mr. Rios left a message for the RAD Manager requesting a call back. The RAD Manager returned Mr. Rios' call later that day and left a voicemail (Attachment 3).

On May 14, 2015, Mr. Frulla left a message with the RAD Manager stating that he had a draft Form 99 ready for review and asked for a call back. Later that day, the RAD Manager called Mr. Frulla and advised him that the Committee should file the Form 99

On May 19, 2015, Mr. Frulla called regarding another issue, but also stated that the Committee's co-counsel would be filing a Form 99 on behalf of the Committee that discussed the additional receipts disclosed on the Committee's Amended 2014 August Monthly Report, received September 19, 2014 (Attachment 3).

On May 20, 2015, the Committee filed an additional Form 99 in response to the RFAI. The Committee stated, in part:

"The receipts at issue in this inquiry, \$226,932.34, were contributed during the August 2014 Report's reporting period but deposited after that

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report was filed. The committee delayed depositing the funds during a review that confirmed the accuracy of contribution amounts and recipients. Following this review, the committee deposited the check, which cleared on September 17, 2014, and filed the Amended Report to disclose this transaction. As part of said review, the committee also reviewed and improved its internal processes.

Contributions are deducted from participating members' vacation contributions and remitted to the committee semiannually, on July 1 and December 1. Members' contributions are based on the number of hours worked. The committee receives contributions from many thousands of members in each semiannual period. The contributions at issue here derived from the July 1, 2014 distribution" (Image 15951411699).

To date, no further communication has been received from the Committee regarding this matter.

15951411699

O-Index

8/7/2015 4:53 PM

O-Index (2015-2016)

Comte. ID: C00285593 Comte. Name: SOUTHWEST REGIONAL COUNCIL OF CARPENTERS LEGISLATIVE IMPROVEMENT CMTE UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AMERICA
 Treasurer Name: THORNHILL, RANDY Address: 555 CAPITOL MALL, SUITE 1425, SACRAMENTO, CA 95814
 Comte. Type: Q (QUALIFIED NON-PARTY) Comte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	A/I	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-M			1/28/2015	1	15950120383										
MS-O			2/4/2015	2	15330073542										
MS-T			5/20/2015	1	15951411699										
MS-T			7/29/2015	1	201507299000439884										
F3XN	MY	N	7/29/2015	9	201507299000439859	1/1/2015	6/30/2015		\$1,633,533	\$419,491	\$5,500	\$2,047,524			\$0
Totals										\$419,491	\$5,500				

O-Index (2013-2014)

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MS-M			1/24/2013	1	13960470641										
MS-O			1/31/2013	1	13330021538										
MS-M			2/19/2014	1	14940518805										
MS-O			3/8/2014	2	14330048903										
MS-T			11/10/2014	1	14952577605										
RQ2	M8	A	10/8/2014	2	14330082205	7/1/2014	7/31/2014	10/9/2014							
F3XN	MY	N	7/30/2013	7	13941285609	1/1/2013	6/30/2013		\$1,942,606	\$279	\$150,000	\$1,792,886			\$0
F3XN	YE	N	1/14/2014	7	14860015800	7/1/2013	12/31/2013		\$1,792,886	\$347,235	\$0	\$2,140,121			\$0
F3XN	M2	N	2/19/2014	5	14960460601	1/1/2014	1/31/2014		\$2,140,121	\$47	\$0	\$2,140,169			\$0
F3XN	M3	N	3/17/2014	5	14960504864	2/1/2014	2/28/2014		\$2,140,169	\$44	\$0	\$2,140,214			\$0
F3XN	M4	N	4/11/2014	5	14960652580	3/1/2014	3/31/2014		\$2,140,214	\$46	\$0	\$2,140,260			\$0
F3XN	M5	N	5/15/2014	5	14960803458	4/1/2014	4/30/2014		\$2,140,260	\$47	\$0	\$2,140,307			\$0
F3XN	M6	N	6/20/2014	7	14941623640	5/1/2014	5/31/2014		\$2,140,307	\$48	\$500,000	\$1,640,354			\$0
F3XN	M7	N	7/18/2014	6	14961876117	6/1/2014	6/30/2014		\$1,640,354	\$0	\$2,800	\$1,637,854			\$0
F3XN	M8	N	8/20/2014	7	14950080449	7/1/2014	7/31/2014		\$1,637,854	\$0	\$8,000	\$1,629,854			\$0
F3XA	M8	A	9/18/2014	7	14970870244	7/1/2014	7/31/2014		\$1,637,854	\$228,932	\$8,000	\$1,856,786			\$0
F3XN	M9	N	9/19/2014	11	14970871586	8/1/2014	8/31/2014		\$1,856,786	\$0	\$21,500	\$1,835,286			\$0
F3XN	M10	N	10/20/2014	18	14951771769	9/1/2014	9/30/2014		\$1,835,286	\$0	\$381,720	\$1,453,566			\$0
F3XN	12G	N	10/23/2014	5	14952389962	10/1/2014	10/15/2014		\$1,453,566	\$0	\$0	\$1,453,566			\$0
F3XN	30G	N	12/2/2014	8	14952884935	10/16/2014	11/24/2014		\$1,453,566	\$0	\$34,647	\$1,418,919			\$0
F3XN	YE	N	1/28/2015	7	15950119885	11/25/2014	12/31/2014		\$1,418,919	\$220,164	\$5,550	\$1,633,533			\$0
F1A		A	5/15/2014	9	14960803440										
Totals									\$794,843	\$1,103,917					

O-Index (2011-2012)

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MS-M			1/31/2012	1	12970342105										
MS-O			2/8/2012	2	12330001918										
RQ1		A	9/23/2011	2	11330012840			9/23/2011							

O-Index

8/7/2015 4:53 PM

1	F3XN	MY	N	7/17/2011	6	11831838201	1/1/2011	8/30/2011	\$1,894,180	\$806	\$0	\$1,894,787	\$0
2	F3XN	YE	N	1/30/2012	7	12870171003	7/1/2011	12/31/2011	\$1,894,787	\$334,036	\$0	\$2,028,823	\$0
3	F3XN	M2	N	2/18/2012	8	12850513757	1/1/2012	1/31/2012	\$2,028,823	\$47	\$0	\$2,028,871	\$0
4	F3XN	M3	N	3/19/2012	5	12870750595	2/1/2012	2/28/2012	\$2,028,871	\$48	\$0	\$2,028,917	\$0
5	F3XN	M4	N	4/20/2012	6	12871128224	3/1/2012	3/31/2012	\$2,028,917	\$48	\$0	\$2,028,963	\$0
6	F3XN	M5	N	5/16/2012	5	12871217484	4/1/2012	4/30/2012	\$2,028,963	\$47	\$0	\$2,028,011	\$0
7	F3XN	M6	N	6/16/2012	7	12852127708	5/1/2012	5/31/2012	\$2,028,011	\$48	\$225,000	\$1,804,067	\$0
8	F3XN	M7	N	7/17/2012	6	12852503607	6/1/2012	6/30/2012	\$1,804,067	\$47	\$0	\$1,804,105	\$0
9	F3XN	M8	N	8/14/2012	8	12852839118	7/1/2012	7/31/2012	\$1,804,105	\$187,380	\$0	\$1,971,485	\$0
10	F3XN	M9	N	9/14/2012	6	12852913648	8/1/2012	8/31/2012	\$1,971,485	\$47	\$0	\$1,971,542	\$0
11	F3XN	M10	N	10/19/2012	6	12860014820	9/1/2012	9/30/2012	\$1,971,542	\$47	\$0	\$1,971,590	\$0
12	F3XN	12G	N	10/24/2012	8	12860691880	10/1/2012	10/17/2012	\$1,971,590	\$0	\$100,000	\$1,871,590	\$0
13	F3XN	30G	N	12/4/2012	7	12881324185	10/18/2012	11/28/2012	\$1,871,590	\$48	\$105,000	\$1,768,636	\$0
14	F3XN	YE	N	1/24/2013	7	13860470560	11/27/2012	12/31/2012	\$1,768,636	\$175,970	\$0	\$1,942,606	\$0
15	F1A		A	7/14/2011	10	11831825191							
16	F1A		A	1/12/2012	10	12850076986							
17	Totals									\$678,425	\$430,000		

**Southwest Regional Council of Carpenters Legislative Improvement Cmte United
Brotherhood of Carpenters & Joiners of America (C00285593)**

Additional Receipts by Line Number

2014 August Monthly Report/Amended 2014 August Monthly Report

Report Line	2014 August Monthly Report (Image 14950080451)	Amended 2014 August Monthly Report, received 9/19/14 (Image 14970870246)	Variance Amount
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$226,932.34	\$226,932.34
Total Variance:			\$226,932.34