

KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP

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September 14, 2015

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20436

RE: RR 15L-26
Southwest Regional Council of Carpenters Legislative Improvement
Cmte United Brotherhood of Carpenters & Joiners of America

Dear Ms. deBeau:

On behalf of the above-reference committee and its Treasurer, Mr. Randy Thornhill (collectively, "SW CLIC"), we respectfully request that the Commission take no action in this matter. At issue here is the reporting of a delayed deposit of \$226,932.34 of unitemized contributions collected from participating United Brotherhood of Carpenters members' vacation contributions on July 1, 2014.

The referral by the Reports Analysis Division ("Referral") notes correctly that SW CLIC amended its August 2014 Monthly Report to disclose the delayed deposit of these contributions and responded to RAD's October 9, 2014 Request for Additional Information. Olson Hagel & Fishburn LLP ("Olson Hagel"), SW CLIC's counsel for general compliance and related matters, filed the corresponding Form 99 Miscellaneous Report on November 10, 2014. The Referral also correctly notes that Olson Hagel supplemented this Form 99 filing in May 2015 after that firm became aware of the internal review led by Kelley Drye & Warren LLP. This extensive internal review (involving review of over 100,000 member contribution records and implementation of identified remedial measures) began in Summer 2014.

RAD was not, however, aware of, and thus failed to identify three salient facts in its Referral. First, Olson Hagel was not notified of Kelley Drye's internal review until April 2015, and thus based the November 2014 Form 99 filing on the information that firm had at hand.

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Second, the pendency of the review directly caused the delayed deposit; SW CLIC administrative staff were unsure whether they should have deposited the \$226,932.34 check with the review ongoing. Once that concern was resolved, the check was deposited essentially immediately.

Page 9 of that document quantified the delay and posited that "concerns over depositing this check during the pendency of this review occasioned its delayed deposit."

For the foregoing reasons, the Commission should take no action on this Referral.

Respectfully submitted,



David E. Frulla

Digitally signed by CEL

Stamp _ Mary Beth

deBeau

DN: cn=CELA Stamp

Mary Beth deBeau;

o=Federal Election

Commission, ou=OGC,

email=mdebeau@fec.g

v, c=US

Date: 2015.09.15

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FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # RR15L-26

Name of Counsel: David Frulla and Jeffrey Hunter

Firm: Kelley Drye & Warren LLP

Address: Washington Harbour, Suite 400
3050 K Street, NW

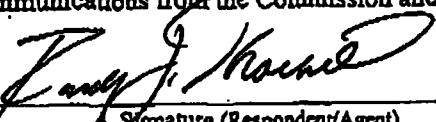
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E-mail: dfrulla@kellydrye.com and jhunter@kellydrye.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/9/15
Date


Signature (Respondent/Agent)

Treasurer
Title

RESPONDENT: Southwest Regional Council of Carpenters Legislative Improvement Cmte
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 533 S Fremont Avenue
(Please Print)
Los Angeles CA 90071

Telephone (H): n/a (W): (213) 385 1457

E-mail: rthornhill@swcarpenters.org

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.