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Federal Election Commission
Washington, DC 20463

MEMORANDUM

November 29, 2016

TO: The Commission

THROUGH: Alec Palmer *EWP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 808 Southwest Regional Council of Carpenters
Legislative Improvement Committee United Brotherhood
of Carpenters & Joiners of America and Randy Thornhill,
Treasurer, Recommendation to Approve Settlement
Agreement

RESOLUTION TERMS: Develop and certify implementation of a compliance
operations manual which includes internal controls
consistent with those described in the Commission's
Internal Controls and Political Committees advisory
document (2007) and the Best Practices for Committee
Management, as well as a process to track receipt of, and
response to, communications with the Commission; certify
that a representative of the Committee participated in an
FEC conference, webinar, or other program developed in
consultation with the FEC's Information Division; and pay
a civil penalty of \$2,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 808 (RR 15L-26). The ADR Office received this referral from the Office of the General Counsel (OGC) on July 12, 2016.

Recommendation to Approve
Settlement Agreement
ADR 808 (RR 15L-26)
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SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Southwest Regional Council of Carpenters Legislative Improvement Committee United Brotherhood of Carpenters & Joiners of America and Randy Thornhill, Treasurer (Respondents or the Committee), for failing to disclose all financial activity on their 2014 August Monthly Report. Respondents filed their original 2014 August Monthly Report on August 20, 2014, followed by an Amended 2014 August Monthly Report on September 19, 2014. The amended report disclosed \$226,932.34 in additional receipts.

The Committee contends it was a single time staff-level decision to delay depositing a single, semi-annual member vacation pay deduction contribution transmittal check. The Committee asserts that it alerted the Commission to the potential violation, took immediate and appropriate corrective action, and amended reports to correct the record. Respondents further contend that the unusual circumstances arose toward the end of an extensive, months-long review of potentially misallocated authorized contributions between two affiliated committees caused by an obscure accounting software error over a 20-year period.

17-1000004122

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Southwest Regional Council of Carpenters Legislative Improvement Committee United Brotherhood of Carpenters & Joiners of America and Randy Thornhill, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.