



September 28, 2016

Mr. Jack Buckhorn, Treasurer
Sonoma/Mendocino Counties BCTC
2525 Cleveland Ave
Santa Rosa, CA 95403

Case Number: 530-6008568
LM Number: 048746

Dear Mr. Buckhorn:

This office has recently completed an audit of Sonoma/Mendocino Counties Building & Construction Trades Council (BCTC) 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 Office Secretary Cindy Johnson on September 28, 2016, 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 / LM-3) filed by the BCTC for the fiscal year ended June 30, 2015, was deficient in that the BCTC failed to file the revised copy of its 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. The BCTC amended its constitution and bylaws in 2013, but did not file a copy with its LM report for that year. A current copy of the BCTC's bylaws was submitted during the audit.

I want to extend my personal appreciation to the Sonoma/Mendocino Counties Building & Construction Trades Council 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