



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

## MEMORANDUM

July 9, 2003

TO: LAWRENCE H. NORTON  
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR *JAC*

ROBERT J. COSTA  
DEPUTY STAFF DIRECTOR *RJC*

FROM: JOHN D. GIBSON *JDG*  
ASSISTANT STAFF DIRECTOR  
REPORT ANALYSIS DIVISION

SUBJECT: REFERRAL OF NARAL PRO-CHOICE AMERICA

NARAL Pro-Choice America ("the Committee") failed to file two 24-Hour Notices totaling \$241,956.50 to support the independent expenditures disclosed on the 2002 30 Day Post-General Report. In accordance with the 2001-2002 RAD Review and Referral Procedures for Unauthorized Committees (Standard 7), further examination is required by your office.

If you have any questions regarding this referral, please contact Alissa Sagri at 694-1130.

Attachments

24 " 19 " 025 " 3049

## REPORTS ANALYSIS REFERRAL

DATE: July 9, 2003

ANALYST: Alissa Sagri

## I. COMMITTEE

**NARAL PRO-CHOICE AMERICA**  
 (FKA: National Abortion and Reproductive  
 Rights Action League PAC) (C00079541)  
 Michael Meehan, Treasurer<sup>1</sup>  
 1156 15<sup>th</sup> Street, N.W., Suite 700  
 Washington, DC 20005

## II. RELEVANT STATUTE:

2 U.S.C. §§434(b)(6)(B)(iii) and (c)(2)  
 11 C.F.R. §104.4(b)

## III. BACKGROUND:

Failure to File 24-Hour Notices

NARAL Pro-Choice America ("the Committee") failed to file two (2) 24-Hour Notices for independent expenditures totaling \$241,956.50, made after the 20<sup>th</sup> day but more than 24 hours, before 12:01 a.m. of the day of the 2002 General Election.

A Prior Notice ("the Notice") was sent to the Committee on September 30, 2002. The Notice included a section titled *24 Hour Report on Independent Expenditures*. This section reads: "Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file a 24-hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20<sup>th</sup> day, but more than 24 hours, before the day of the election. This report is *not* required when a Party Committee or PAC makes a contribution directly to a candidate." (Attachment 2.)

On October 30, 2002, the Committee filed a 24-Hour Notice for independent expenditures totaling \$118,204.19 made on behalf of four (4) federal candidates on October 29, 2002. (Attachment 3.)

On December 5, 2002, the Committee filed a 2002 30 Day Post-General Report which disclosed a total of \$400,222.52 in independent expenditures on Schedule E made

<sup>1</sup> The Committee disclosed Michael Meehan as the current Treasurer on their Amended Statement of Organization dated April 24, 2003. Mr. Meehan's predecessor, Karisa Johnson, served as Treasurer of record at the time the apparent violation occurred.

on behalf of six (6) different federal candidates between October 24 and 29, 2002. (Attachment 4.) Upon review of Schedule E, the Committee may have failed to file two of the required 24-Hour Notices for "last minute" independent expenditures.

On January 24, 2003, an Informational Notice ("IN") was sent to the Committee for the 2002 30 Day Post-General Report (Attachment 5). The IN notes that the Committee may have failed to file one or more of the required 24-Hour Notices for "last minute" independent expenditures in support of two (2) different federal candidates. Copies of Schedule E of the 2002 30 Day Post-General Report were included with the IN and indicated that the following independent expenditures required the filing of 24-Hour Notices:

<u>Name of Payee</u>	<u>Purpose</u>	<u>Date</u>	<u>Amount</u>	<u>Federal Candidate</u>
GMMB, Inc.	Paid Media	10/24/02	\$199,824.00	Jean Shaheen
Squier, Knapp, Dunn	Paid Media	10/29/02	\$42,132.50	Tom Strickland

In addition, the IN states that, although the Commission may take further action, the Committee's prompt response will be taken into consideration.

On February 7, 2003, the Committee responded to the IN citing explanations for each of the missing 24-Hour Notices (Attachment 6). The response stated that the independent expenditure totaling \$42,132.50 on behalf of Tom Strickland ("Strickland Independent Expenditure"), paid to Squier, Knapp, Dunn and disclosed on Schedule E of the 2002 30 Day Post-General Report, was "reported on the Committee's original pre-general report as cost estimates based on contracts the Committee had entered into as of the time the original pre-general report was filed." The Committee also disclosed that "[d]ue to a computer software error, however, the estimated amounts shown for Tom Strickland independent expenditures on the pre-general report were combined as aggregate totals instead of the correct entries. Accordingly, rather than itemize two estimates of \$20,500.00 and \$21,500.00 as these entries were entered into the computer, the software aggregated these estimates with other independent expenditures for Tom Strickland which appear on page 50 of the Committee's original pre-general report. When it realized the software error and after it received the final invoice, the Committee showed the actual amount of \$42,132.50, which was paid in the post-general period."

In addition, the February 7, 2003 response addressed the \$199,824 independent expenditure for "Paid Media" to GMMB, Inc. made on behalf of Jean Shaheen ("Shaheen Independent Expenditure"). The Committee's response indicates that the 24-Hour Notice for the Shaheen Independent Expenditure was generated on October 25, 2002. The response also indicates that the Committee would submit a copy of the prepared 24-Hour Notice and the computer records under separate cover, and that they were unsure why the Commission was not in receipt of this 24-Hour Notice.

On February 10, 2003, the Committee filed a response which included a copy of the 24-Hour Notice as well as a "Document Summary"<sup>2</sup> sheet from the Committee's computer indicating the creation of the 24-Hour Notice on October 25, 2002. The Commission has no record of receiving a 24-Hour Notice for the Shaheen Independent Expenditure on October 25, 2002. (Attachment 7.)

On April 2, 2003, a Request for Additional Information ("RFAI") was sent to the Committee asking it to provide the date of public dissemination for both the Strickland and Shaheen Independent Expenditures. (Attachment 8.)

On April 21, 2003, the Committee responded to the RFAI. This response disclosed the date of public dissemination for the Strickland Independent Expenditure as October 29, 2002.<sup>2</sup> For the Shaheen Independent Expenditure, the Committee disclosed the date of public dissemination as October 26, 2002.<sup>3</sup> (Attachment 9.)

The Commission has no record of receiving 24-Hour Notices for the Strickland and Shaheen Independent Expenditures.

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<sup>2</sup> The "Document Summary" that the Committee provided as part of their February 10, 2003 response was examined by Eliza Green of the Commission's Electronic Filing Office. Ms. Green verified that this "Document Summary" was in fact from the Committee's computer software program and is not part of the Commission's validation program for electronic filing.

<sup>2</sup> The payment for the Strickland Independent Expenditure was also made on this date.

<sup>3</sup> The payment for the Shaheen Independent Expenditure was made on October 24, 2002. The Committee disclosed the date of the payment on Schedule E of the Committee's 2002 30 Day Post-General Report.

FEDERAL ELECTION COMMISSION  
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NATIONAL ABORTION AND REPRODUCTIVE RIGHTS ACTION LEAGUE PAC  
Johnson, Karisa  
Filing Frequency: MONTHLY

1156 15th Street NW

Washington

NON-PARTY QUALIFIED  
DC 20005

ID #C00079541

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	4/20/2001	4	21037032939						
1			A	6/20/2001	3	21037134570						
1			A	1/29/2002	4	22990170370						
1			A	4/24/2002	6	22990806160						
MS			T	10/26/2001	4	21037343412						
MS			N	11/23/2001	2	21037353115						
MS			T	2/14/2002	1	22990399914						
MS			2	10/30/2002	2	22992530196						
RQ	M3	2		2/06/2002	1	22037433227	2/01/2001 2/28/2001					
RQ	M4	2		2/06/2002	2	22037433228	3/01/2001 3/31/2001					
RQ	M12	2		1/30/2002	3	22037422390	11/01/2001 11/30/2001					
RQ		1		4/10/2002	3	22037522399	4/10/2002					
RQ	M4	2		6/26/2002	19	22037620790	3/01/2002 3/31/2002					
RQ	M5	5		8/30/2002	4	22037714468	4/01/2002 4/30/2002					
RQ	M6	2		10/02/2002	5	22037744560	5/01/2002 5/31/2002					
RQ	M6	3		10/24/2002	6	22037814828	5/01/2002 5/31/2002					
RQ	M10	2		1/29/2003	4	23037952053	9/01/2002 9/30/2002					
RQ	M10	3		2/20/2003	5	23037993260	9/01/2002 9/30/2002					
RQ	30G	2		4/02/2003	5	23038030003	10/17/2002 11/25/2002					
RQ	30G	5		1/24/2003	6	23037941559	10/17/2002 11/25/2002					
RQ	YE	2		2/12/2003	2	23037984016	11/26/2002 12/31/2002					
3	M2	N	P	2/20/2001	5	21990044452	1/01/2001 1/31/2001	355080	15525	13406	357199	0
3	M3	N	P	3/20/2001	6	21990053853	2/01/2001 2/28/2001	357199	4388	11610	349977	0
3	M3	A	P	5/18/2001	4	21990110331	2/01/2001 2/28/2001	357199	4388	11610	349977	0

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ID #C00079541

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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				REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M4	N	P	4/20/2001	11	2299086424	3/01/2001 3/31/2001	349977	5146	39721	315401	0
3	M4	A	P	5/18/2001	8	22990110614	3/01/2001 3/31/2001	349977	5146	39721	315401	0
3	M4	A	P	2/25/2002	17	22990482024	3/01/2001 3/31/2001	343977	5146	38721	310401	0
3	M5	N	P	5/17/2001	6	21990108324	4/01/2001 4/30/2001	315401	5516	10435	310482	0
3	M6	N	P	6/20/2001	7	21990148818	5/01/2001 5/31/2001	310482	16310	36637	290155	0
3	M7	N	P	7/20/2001	18	21990226597	6/01/2001 6/30/2001	290155	5845	35614	260386	0
3	M8	N	P	8/20/2001	9	21990426419	7/01/2001 7/31/2001	260386	1911	2403	259894	0
3	M9	N	P	9/20/2001	10	21990495897	8/01/2001 8/31/2001	259894	6396	5536	260754	0
3	M10	N	P	10/19/2001	10	21990537562	9/01/2001 9/30/2001	260754	50157	10226	300685	0
3	M11	N	P	11/20/2001	11	21990610586	10/01/2001 10/31/2001	300685	113330	3180	410835	0
	M12	N	P	12/20/2001	32	21990674894	11/01/2001 11/30/2001	410835	270101	7115	673822	0
	M12	A	P	1/31/2002	32	22990246442	11/01/2001 11/30/2001	410835	258987	7589	662234	0
	M12	A	P	2/14/2002	32	22990399357	11/01/2001 11/30/2001	410835	258987	7589	662234	0
	YE	N	P	1/31/2002	17	22990246817	12/01/2001 12/31/2001	662234	35235	4717	692753	0
	YE	A	P	2/14/2002	17	22990399389	12/01/2001 12/31/2001	662234	35235	4717	692753	0
	M2	N	P	2/20/2002	11	22990436493	1/01/2002 1/31/2002	692753	32206	367	724591	0
	M3	N	P	3/20/2002	8	22990554861	2/01/2002 2/28/2002	724591	10987	11893	723684	0
	M3	A	P	3/21/2002	8	22990559219	2/01/2002 2/28/2002	724591	10987	11893	723684	0
	M4	N	P	4/19/2002	18	22990778927	3/01/2002 3/31/2002	723684	11958	82584	653059	0
	M4	A	P	7/12/2002	18	22991277199	3/01/2002 3/31/2002	723684	11958	82584	653059	0
	M5	N	P	5/20/2002	12	22990993110	4/01/2002 4/30/2002	653059	28548	70233	611373	0
	M5	A	P	5/21/2002	13	22990995689	4/01/2002 4/30/2002	653059	28548	70233	611373	0
	M5	A	P	9/23/2002	13	22991897209	4/01/2002 4/30/2002	653059	28548	70233	611373	0
3	M6	N	P	6/20/2002	24	22991135233	5/01/2002 5/31/2002	611373	111710	141019	582065	0

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ONAL ABORTION AND REPRODUCTIVE RIGHTS ACTION LEAGUE PAC  
son, Karisa  
NG FREQUENCY: MONTHLY

1156 15th Street NW

Washington

NON-PARTY QUALIFIED  
DC 20005

ID #C00079541

TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M6	A	P	11/13/2002	24	22992569645	5/01/2002 5/31/2002	611373	111710	141019	582065	0
3	M7	N	P	7/19/2002	32	22991448633	6/01/2002 6/30/2002	582065	184969	109261	657772	0
3	M7	A	P	7/19/2002	32	22991453976	6/01/2002 6/30/2002	582065	184969	109261	657772	0
3	M8	N	P	8/20/2002	23	22991633205	7/01/2002 7/31/2002	657772	125783	108959	674597	0
3	M9	N	P	9/20/2002	44	22991875812	8/01/2002 8/31/2002	674597	224389	53875	845111	0
3	M10	N	P	10/20/2002	62	22992345445	9/01/2002 9/30/2002	845111	278175	80256	1043029	0
3	M10	A	P	10/24/2002	62	22992477935	9/01/2002 9/30/2002	845111	290522	80256	1055377	0

24.49.035.51.42

						9/01/2002	9/30/2002	045111	290522	80256	1055377	0
3	12G	N	P	10/24/2002	52	22992478891	10/01/2002 10/16/2002	1055377	29333	1256366	28344	0
3	12G	A	P	12/05/2002	53	22992957503	10/01/2002 10/16/2002	1055377	29333	830114	454595	0
3	30G	N	P	12/05/2002	74	22992957845	10/17/2002 11/25/2002	454595	240047	444225	250418	0
3	30G	A	P	2/10/2003	77	23990366048	10/17/2002 11/25/2002	454595	241717	448387	247925	0
3	30G	A	P	2/10/2003	4	23037983070	10/17/2002 11/25/2002	-	-	-	-	-
3	YE	N	P	1/31/2003	15	23990308610	11/26/2002 12/31/2002	247925	19006	8830	258102	0
3	YE	A	P	2/19/2003	15	23990424056	11/26/2002 12/31/2002	247925	19006	8830	258102	0
							TOTAL		2029874	2131852		

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DATE 7/08/2003  
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AL PRO-CHOICE AMERICA PAC  
1ae1 Meahan  
ING FREQUENCY: QUARTERLY

1156 15th NW

Washington

NON-PARTY QUALIFIED  
DC 20005

ID #C00079541

I TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1		A		1/08/2003	4	23990042977						
1		A		4/24/2003	10	23990814337						
MS		M		1/31/2003	1	23990308632						
MS		T		2/07/2003	2	23990359118						
MS		O		2/07/2003	2	23037982586						
MS		T		2/20/2003	1	23990435072						
MS		T		3/11/2003	1	23990515814						
MS		T		4/21/2003	1	23990799797						
TOTAL								0	0	0		

All reports have been reviewed for the 2001-2002 cycle:

Cash on Hand as of 12/31/02:	\$258,102.55
Debts Owed by the Committee:	\$0
Debts Owed to the Committee:	\$0

# GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 2002

## I. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT.	
		MAILING DATE <sup>2</sup>	FILING DATE
Pre-General	10/01/02 - 10/16/02	10/21/02	10/24/02
Post-General	10/17/02 - 11/25/02	12/05/02	12/05/02

## II. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16<sup>3</sup>

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT.	
		MAILING DATE <sup>2</sup>	FILING DATE
Post-General	10/01/02 - 11/25/02	12/05/02	12/05/02

### WHO MUST FILE

Party Committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

<sup>1</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>2</sup>Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

<sup>3</sup>Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart I.

(over)

**IMPORTANT FILING INFORMATION**

In response to the anthrax threat, the US Postal Service is irradiating mail directed to many federal government agencies, including the FEC and the Secretary of the Senate.<sup>4</sup> This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than regular US mail. Alternative methods include:

- Electronic Filing;
- Overnight mail service; and
- Hand delivery.

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file a 24-hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. This report is *not* required when a Party Committee or PAC makes a contribution directly to a candidate. ] 5

**ELECTRONIC FILING**

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/electfil/electron.html>.

**COMPLIANCE**

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties ranging from \$125 to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit the FEC web site at <http://www.fec.gov/adminfines1.html>.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

<sup>4</sup>Committees that support only Senate candidates should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via regular US mail.



24 hour notice of independent expenditure, on :

FEC ID No.

SCHEDULE E (FEC Form 3X)

ITEMIZED INDEPENDENT EXPENDITURES

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FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER	
Full Name (Last, First, Middle Initial) of Payee Squar Knapp Dunn Communications		Purpose of Expenditure Television Media Buy	Category/ Type
Mailing Address 511 2nd Street NE		Name of Federal Candidate supported or opposed by expenditure: THOMAS LEE STRICKLAND	
City Washington	State DC	Zip Code 20002	
Date M N E J T Y P Y 10 29 2002	Transaction ID: SE24.4407 Amount \$4382.50	Office Sought <input type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> Presidential State: CO District: CO Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

(a) SUBTOTAL of Itemized Independent Expenditures .....	\$4382.50
(b) SUBTOTAL of Unitemized Independent Expenditures .....	0.00
(c) TOTAL Independent Expenditures .....	118204.19

I, the undersigned, being a duly qualified Notary Public for the State of Colorado, do hereby certify that the foregoing is a true and correct copy of the original as the same appears to me. My Commission expires:

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2002.

Signature \_\_\_\_\_ Date \_\_\_\_\_

\_\_\_\_\_  
 NOTARY PUBLIC

2002-11-01 10:00:00

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

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FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Natl. Abortion & Reprod Rights Action League PAC	FEC IDENTIFICATION NUMBER C00079541
---	--

Full Name (Last, First, Middle, Initial) of Payee Bates-Neimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave, NW Suite 830	Name of Federal Candidate supported or opposed by expenditure: Tom Strickland	
City State Zip Code Washington DC 20005	Office Sought: House <input checked="" type="checkbox"/> Senate Presidential	
Date Amount 10 28 2002 28443.33	State CO District Check One: <input checked="" type="checkbox"/> Support Oppose	
Transaction ID: D158		
Full Name (Last, First, Middle, Initial) of Payee Bates-Neimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave, NW Suite 830	Name of Federal Candidate supported or opposed by expenditure: Stanley Toshi Matsunaka	
City State Zip Code Washington DC 20005	Office Sought: <input checked="" type="checkbox"/> House Senate Presidential	
Date Amount 10 28 2002 13618.50	State CO District 04 Check One: <input checked="" type="checkbox"/> Support Oppose	
Transaction ID: D183		
Full Name (Last, First, Middle, Initial) of Payee Bates-Neimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave, NW Suite 830	Name of Federal Candidate supported or opposed by expenditure: Tom Harkin	
City State Zip Code Washington DC 20005	Office Sought: House <input checked="" type="checkbox"/> Senate Presidential	
Date Amount 10 29 2002 11910.84	State IA District Check One: <input checked="" type="checkbox"/> Support Oppose	
Transaction ID: D198		

(a) SUBTOTAL of Itemized Independent Expenditures .....	51972.67
(b) SUBTOTAL of Unitemized Independent Expenditures .....	0.00
(c) TOTAL Independent Expenditures .....	

Under penalty of perjury, I certify that the information reported on this statement is true and correct to the best of my knowledge and belief, and that I am not a candidate for any federal office, and that I am not a member of any committee or authorized committee.

\_\_\_\_\_  
Signature

Date 10 28 2002

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

NAME OF COMMITTEE (In Full) Natl Abortion & Reprod Rights Action League PAC	FEC IDENTIFICATION NUMBER C00079541
--	--

Full Name (Last, First, Middle, Initial) of Payee Bates-Naimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave. NW Suite 830	Name of Federal Candidate supported or opposed by expenditure: Julianne Thomas	
City Washington State DC Zip Code 20005	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	
Date 10 29 2002 Amount 5924.57	State IA District 02	
Transaction ID: D197	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

Full Name (Last, First, Middle, Initial) of Payee Bates-Naimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave. NW Suite 830	Name of Federal Candidate supported or opposed by expenditure: Ann Hutchinson	
City Washington State DC Zip Code 20005	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	
Date 10 29 2002 Amount 5986.28	State IA District 1	
Transaction ID: D198	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

Full Name (Last, First, Middle, Initial) of Payee GM MB, Inc.	Purpose of Expenditure Paid Media	Category/ Type
Mailing Address 1010 Wisconsin Avenue, NW Suite 800	Name of Federal Candidate supported or opposed by expenditure: Jean Shaheen	
City Washington State DC Zip Code 20007	Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> Presidential	
Date 10 24 2002 Amount 199824.00	State NH District	
Transaction ID: D153	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

(a) SUBTOTAL of Itemized Independent Expenditures .....	211734.85
(b) SUBTOTAL of Unitemized Independent Expenditures .....	0.00
(c) TOTAL Independent Expenditures .....	

These expenditures are not subject to the contribution limits and other restrictions that apply to contributions to candidates for federal office or to any other federal election, primary or caucus, or to any other election of a member of Congress or of a state legislature.

Date            /            /           

Signature \_\_\_\_\_

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

NAME OF COMMITTEE (In Full) Natl Abortion & Reprod Rights Action League PAC	FEC IDENTIFICATION NUMBER C00079541
--	--

Full Name (Last, First, Middle, Initial) of Payee Squier Knapp Dunn Mailing Address 511 2nd Street NE Washington, DC 20002 City State Zip Code Washington DC 20002 Date Amount 10 29 2002 42132.50 Transaction ID: D170	Purpose of Expenditure Paid Media Name of Federal Candidate supported or opposed by expenditure: Tam Blickland Office Sought: House <input checked="" type="checkbox"/> Senate Presidential State <u>CO</u> District: _____ Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Category/Type
Full Name (Last, First, Middle, Initial) of Payee Squier Knapp Dunn Mailing Address 511 2nd Street NE Washington, DC 20002 City State Zip Code Washington DC 20002 Date Amount 10 29 2002 84382.50 Transaction ID: D171	Purpose of Expenditure Paid Media Name of Federal Candidate supported or opposed by expenditure: Tam Blickland Office Sought: House <input checked="" type="checkbox"/> Senate Presidential State <u>CO</u> District: _____ Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Category/Type

(a) SUBTOTAL of Itemized Independent Expenditures .....	136515.00
(b) SUBTOTAL of Unitemized Independent Expenditures .....	0.00
(c) TOTAL Independent Expenditures .....	400222.52

Under penalty of perjury, I certify that the information reported on this schedule was true and correct at the time it was reported and that I am not a candidate or supporter of any candidate for any office at the federal, state, or local level.

Signature \_\_\_\_\_ Date 10 / 29 / 2002



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-5

Karissa Johnson, Treasurer  
National Abortion and Reproductive Rights  
Action League PAC  
1156 15<sup>th</sup> Street, NW, Suite 700  
Washington, DC 20005

JAN 24 2003

Identification Number: C00079541

Reference: 30 Day Post-General Report (10/17/02-11/25/02)

Dear Ms. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You have previously indicated that your committee has been using "best efforts" to obtain the full name, mailing address, occupation and name of employer for each contributor. However, an increasing number of entries lack this information. Please amend your report by supplying the omitted information or providing an explanation of your efforts in this regard. 11 CFR §§104.3(a)(4)(i) and 104.7

-Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour notices regarding "last minute" independent expenditures (pertinent portion(s) attached). A political committee must notify the appropriate officers (Secretary of the Senate, Federal Election Commission, etc.) as specified in 11 CFR §104.4(c), in writing, within 24 hours of any independent expenditures of \$1,000 or more made between two and twenty days before an election. These expenditures must then be fully itemized on the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.4(b)

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments (to include statements, designations, and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Alissa V. Sagri  
Campaign Finance Analyst  
Reports Analysis Division

299

INFORMED BY THE

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 71/74  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (in Full) Natl Abortion & Reprod Rights Action League PAC	FEC IDENTIFICATION NUMBER C000079541
--	---

Full Name (Last, First, Middle, Initial) of Payee Sales-Naimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave, NW Suite 820	Name of Federal Candidate supported or opposed by expenditure: Tom Steideland	
City Washington	State DC	Zip Code 20006
Date M Y D D Y Y Y Y 10 28 2002	Amount 26443.33	Office Sought: House <input checked="" type="checkbox"/> Senate Presidential State: CO District: _____
Transaction ID: D156	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

Full Name (Last, First, Middle, Initial) of Payee Sales-Naimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave, NW Suite 820	Name of Federal Candidate supported or opposed by expenditure: Stanley Toshi Matsuyaka	
City Washington	State DC	Zip Code 20006
Date M Y D D Y Y Y Y 10 28 2002	Amount 13618.50	Office Sought: <input checked="" type="checkbox"/> House Senate Presidential State: CO District: 04
Transaction ID: D193	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

Full Name (Last, First, Middle, Initial) of Payee Sales-Naimand, Inc.	Purpose of Expenditure Direct Mail	Category/ Type
Mailing Address 1025 Vermont Ave, NW Suite 820	Name of Federal Candidate supported or opposed by expenditure: Tom Mackin	
City Washington	State DC	Zip Code 20006
Date M Y D D Y Y Y Y 10 29 2002	Amount 11910.34	Office Sought: House <input checked="" type="checkbox"/> Senate Presidential State: IA District: _____
Transaction ID: D186	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	

(a) SUBTOTAL of Itemized Independent Expenditures	51972.67
(b) SUBTOTAL of Unitemized Independent Expenditures	0.00
(c) TOTAL Independent Expenditures	

Under penalty of perjury, I certify that the independent expenditures reported herein were not made in connection, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or publication in whole or in part of any campaign material prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2002.

My Commission expires: \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

NOTARY PUBLIC

2005 SEP 14 10:25 AM '02

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 13/14  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (No Full)	FEC IDENTIFICATION NUMBER
Natl Abortion & Reprod Rights Action League PAC	000079541

Full Name (Last, First, Middle, Initial) of Payee Bates-Nelmand, Inc	Purpose of Expenditure Direct Mail	Category Type
Mailing Address 1025 Vermont Ave, NW Suite 800	Name of Federal Candidate supported or opposed by expenditure: Julianne Thomas	
City Washington	State DC	Zip Code 20005
Date M D Y Y Y Y 10 29 2002	Amount 5924.57	Transaction ID: D197
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>IA</u> District: <u>03</u>	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Full Name (Last, First, Middle, Initial) of Payee Bates-Nelmand, Inc	Purpose of Expenditure Direct Mail	Category Type
Mailing Address 1025 Vermont Ave, NW Suite 800	Name of Federal Candidate supported or opposed by expenditure: Ann Hutchinson	
City Washington	State DC	Zip Code 20005
Date M D Y Y Y Y 10 29 2002	Amount 5986.28	Transaction ID: D198
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>IA</u> District: <u>1</u>	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Full Name (Last, First, Middle, Initial) of Payee QMSB, Inc	Purpose of Expenditure Paid Media	Category Type
Mailing Address 1010 Wisconsin Avenue, NW Suite 800	Name of Federal Candidate supported or opposed by expenditure: Joan Shaheen	
City Washington	State DC	Zip Code 20007
Date M D Y Y Y Y 10 24 2002	Amount 199824.00	Transaction ID: D159
Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> Presidential	State: <u>NH</u> District: _____	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	211734.85
(b) SUBTOTAL of Unitemized Independent Expenditures	0.00
(c) TOTAL Independent Expenditures	

Under penalty of perjury I certify that the information concerning expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of nomination, election, or reelection in whole or in part of any campaign unless so specified by the candidate, the campaign committee, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2002.

My Commission expires: \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

NOTARY PUBLIC

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 74774  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (or Full)		FEC IDENTIFICATION NUMBER
Natl Action & Reform Rights Action League PAC		CC0078641

Full Name (Last, First, Middle, Initial) of Payee Squire Knapp Dunn		Purpose of Expenditure Paid Media	Category/Type
Mailing Address 511 2nd Street NE Washington, DC 20002		Name of Federal Candidate supported or opposed by expenditure: Tom Stickland	
City State Zip Code Washington DC 20002		Office Sought: House X Senate Presidential	
Date M M O O Y Y Y Y 10 29 2002	Amount 42132.50	State: CO District: _____	
Transaction ID: D170		Check One: X Support Oppose	

Full Name (Last, First, Middle, Initial) of Payee Squire Knapp Dunn		Purpose of Expenditure Paid Media	Category/Type
Mailing Address 511 2nd Street NE Washington, DC 20002		Name of Federal Candidate supported or opposed by expenditure: Tom Stickland	
City State Zip Code Washington DC 20002		Office Sought: House X Senate Presidential	
Date M M O O Y Y Y Y 10 29 2002	Amount 94382.50	State: CO District: _____	
Transaction ID: D171		Check One: X Support Oppose	

(a) SUBTOTAL of Itemized Independent Expenditures	136515.00
(b) SUBTOTAL of Unitemized Independent Expenditures	0.00
(c) TOTAL Independent Expenditures	136515.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with or at the request or suggestion of any candidate or any authorized committee or agent of any candidate or authorized committee. Furthermore, these expenditures did not include the financing of, participation in, or contribution to, any political party or any campaign, reelection, or reelection in vitro or in part of any campaign, reelection, or reelection in vitro, or any other political activity, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2002.

My Commission expires \_\_\_\_\_, 2002.

Signature \_\_\_\_\_ Date \_\_\_\_\_ NOTARY PUBLIC

**ETEXT ATTACHMENT**

[BEGIN TEXT]

02/07/2003 16:67

February 7, 2003

Ms. Lisa Y. Saggi  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
399 E Street, N.W.  
Washington, DC 20463

Re: NARAL Pro-Choice America PAC  
FEC ID No. C00079541

Dear Ms. Saggi:

This is in response to your letter dated January 24, 2003 concerning the 30-Day Post-General Report (10/17/02-11/25/02) of NARAL Pro-Choice America PAC (the "Committee").

You ask about the Committee's use of "best efforts" to obtain the name, mailing address, occupation and name of employer of its donors. The Committee's practice is to ask for the required information on all of its solicitations. Then, if the information is not provided with the initial contribution, the Committee asks for the information in two separate follow-up letters: one sent reasonably contemporaneously with a thank you for the contribution, and a second sent periodically for all donors who have not responded to prior inquiries. The Committee will amend its post-general report to add the additional information it has received since filing the report and will continue to amend its reports as it receives further responses. In addition, for your information, to improve its best efforts procedure, the Committee intends to go beyond legal requirements and to attempt to collect occupation and employer data when the people sign up as members of the connected organization. While the Committee will continue to use best efforts to collect the information as represented; we anticipate that some collection of the information by the connected organization will help the Committee.

You also ask about 24-hour reports for the Committee's independent expenditures. Three of the four of these independent expenditures were reported on the Committee's original pre-general report as cost estimates based on contracts the Committee had entered into as of the time the original pre-general report was filed. By the time the post-general report was filed, the actual amounts paid for these independent expenditures were adjusted (in an amended pre-general report and the post-general report) to reflect the actual amounts paid during the pre- and post-general reporting periods. A 24-hour report for the fourth independent expenditure was completed. An explanation for each of the questioned independent expenditures follows:

The questioned independent expenditure paid to Bates Neimand for direct mail on behalf of Stanley Tochi Matsunaka in the amount of \$13,618.50 was reported as a part of an estimate of \$45,483.81 on page 47 the Committee's original pre-general report. The Committee estimated the cost because, while it had contracted for the services, it had not received the final invoice. After it received the final invoice, the Committee amended its pre-general report to show the actual amount paid in the pre-general period (\$14,455.50 amended pre-general report at page 47) and the actual amount paid in the post-general period (\$13,618.50 post general report at page 72).

The independent expenditure paid to Squier Knapp Dunn for paid media on behalf of Tom Strickland in the amount of \$42,132.50 was similarly reported on the Committee's pre-general report as two estimates of \$20,500.00 and \$21,500.00. Due to computer software error, however, the estimated amounts shown for Tom Strickland independent expenditures on the pre-general report were combined as aggregate totals instead of the correct entries. Accordingly, rather than itemize two estimates of \$20,500.00 and \$21,500.00 as these entries were entered into the computer, the software aggregated these estimates with other independent expenditures for Tom Strickland which appear on page 50 of the Committee's original pre-general report. When it realized the software error and after it received the final invoice, the Committee showed the actual amount of \$42,132.50, which was paid in the post-general period.

**ETEXT ATTACHMENT**

Similarly, the \$26,443.33 independent expenditure paid to Bates Neimand for direct mail on behalf of Tom Strickland was included in an estimate on the original pre-general report. On page 47 of the original pre-general report the Committee reported a \$78,733.79 estimate for an independent expenditures contracted for at the time that the report was filed. When the Committee received the final invoice, it amended its pre-general report to show the actual amount paid in the pre-general period (\$47,838.46 amended pre-general report at page 47) and the actual amount paid in the post-general period (\$26,443.33 post-general report at page 72).

On October 25, 2002, the Committee prepared a 24-hour report for the independent expenditure paid to GMMB for paid media on behalf of Jeanne Shaheen in the amount of \$199,824.00. Computer records demonstrate that that this report was in fact generated on October 25, 2002. A copy of the prepared 24-hour report and the computer records will be filed under separate cover with the Commission. The Committee is unsure why the Commission is not in receipt of this 24-hour report.

We hope that this information adequately addresses your question. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Cassandra Lentchner  
Counsel to NARAL Pro-Choice America PAC

( ) TEXT

23037983070

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2003 FEB 10 P 3:09

Perkins  
Coie

607 Fourteenth Street N.W.  
Washington, DC 20005-2001  
PHONE 202.626.5600  
FAX 202.442.4630  
WWW.PERKINSCOIE.COM

CASSANDRA F. LENTCHNER  
202.454.1511  
CLNTCF@PERKINSCOIE.COM

February 10, 2003

**BY HAND DELIVERY**

Ms. Alissa V. Sagri  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: NARAL Pro-Choice America PAC  
FEC ID No. C00079541

Dear Ms. Sagri:

Pursuant to the Request for Further Information ("RFAI") response filed on Friday February 7, 2003 on behalf of NARAL Pro-Choice America PAC, enclosed please find two referenced documents that could not be filed electronically. Please include these documents as attachments to the RFAI response.

Very truly yours,

*Cassandra Lentchner*

Cassandra Lentchner  
Counsel to NARAL Pro-Choice America  
PAC

CL:mtm  
Enclosures

[[14867-0601/D/0070418-049]]

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Perkins Coie LLP (Perkins Coie Inc. in Illinois)

FILED - SEC. 974. PM

SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 016  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (in Full) Natl. Abortion & Reprod. Rights Action League PAC	FEDERATION NUMBER C00079541
--	--------------------------------

PAYER Name (Last, First, Middle, Initial) of Payee GMMB, Inc. Mailing Address 1015 Wisconsin Avenue, NW Suite 970 City Washington State Zip Code DC 20007 Date 10/24/02 Annual 199824.00 Transaction ID: D153	Purpose of Expenditure Television Advertisements Name of Federal Candidate supported or opposed by expenditure: Jeanne Eshen Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential State: MD District: 04 Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
---	---

24-19-025-3072

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2003 FEB 10 P 3:09

(a) SUBTOTAL of Itemized Independent Expenditures	199824.00
(b) SUBTOTAL of Unitemized Independent Expenditures	0.00
(c) TOTAL Independent Expenditures	199824.00

Under paragraph (c)(1) only, I certify that the independent expenditures reported herein were made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized agent for a candidate in connection with a federal election. Furthermore, these expenditures do not include the following: a contribution, donation, or expenditure in whole or in part of any campaign materials prepared by the candidate, an authorized agent, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2003.

My Commission expires: \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

NOTARY PUBLIC

24-19-025-3073

**Document Summary**

File: Form3X.fec

Location: Archerfield District 5, QLD

Created: 10/26/02 1:15:22 PM

Modified: 10/26/02 1:15:22 PM

File Size: 10.5 KB (10,752 bytes)

Security: None

Page Count: 20 Pages

Number of Pages: 20

Page 1 of 20

Page 2 of 20

Page 3 of 20

Page 4 of 20

Page 5 of 20

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Page 15 of 20

Page 16 of 20

Page 17 of 20

Page 18 of 20

Page 19 of 20

Page 20 of 20

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt 3-10-03
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>[Signature]</i> PREPARER	3-10-03 DATE PREPARED

24-19-025-3074



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

RQ-2

Karisa Johnson, Treasurer  
NARAL Pro-Choice America  
1156 15th Street N.W., Suite 700  
Washington, DC 20005

APR 02 2003

Identification Number: C00079541

Reference: Amended 30 Day Post-General Report (10/17/02-11/25/02), received  
2/10/03

Dear Ms. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the dates of public dissemination for the independent expenditures made for paid media to Squier, Knapp, Dunn on behalf of Tom Strickland and to GMMB on behalf of Jean Shaheen. Please be advised that the disclosure requirements of an independent expenditure are determined by the date on which the communication was publicly disseminated, as well as the date on which payment is made. 11 CFR §104.4(f) For example, an independent expenditure(s) publicly disseminated in one reporting period and paid for in a later reporting period must be reflected as a memo entry(s) on Schedule E of the report in which the independent expenditure(s) was publicly disseminated *and* as a debt on Schedule D. Payments in future reporting periods for the independent expenditure(s) should be reflected on Schedule E and on Schedule D of the corresponding report (see attached example).

Please amend your report(s) to include the dates of public dissemination for the independent expenditures noted above and to properly disclose this activity, if necessary.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you

REC-500-04-11

need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Alissa V. Sagri  
Campaign Finance Analyst  
Reports Analysis Division

299

24.19.025.3076

# 12 Day Pre-General Report

## SCHEDULE D DEBTS AND OBLIGATIONS Excluding Loans

(Use separate schedule(s) for each numbered line) PAGE 5 / 6  
FOR LINE NUMBER: (check only one)  9  10

NAME OF COMMITTEE (In Full) My Committee			
A Full Name (Last, First, Middle Initial) of Debtor or Creditor Frank's Communications		Nature of Debt (Purpose): Radio Ad (see Schedule E)	
Mailing Address 0000 First Street			
City	State	ZIP Code	
Big City	NE	00000	
Outstanding Balance Beginning This Period 0.00		Transaction ID: SD10.4104	
Amount Incurred This Period 150000.00	Payment This Period 0.00	Outstanding Balance at Close of This Period 150000.00	

2014-10-08 10:30:37

## SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

PAGE 6 / 6  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) My Committee			FEC IDENTIFICATION NUMBER ▼
Full Name (Last, First, Middle, Initial) of Payee Frank's Communications		Purpose of Expenditure Radio Ad	Category/Type
Mailing Address 0000 First Street			Name of Federal Candidate supported or opposed by expenditure: Bob for Senate
City	State	Zip Code	
Big City	NE	00000	
Date M M D D Y Y Y Y 10 11 2002	Amount 150000.00	[MEMO ITEM]	Office Sought: House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> Presidential <input type="checkbox"/>
Transaction ID: SE24 4100		State: RI District: _____	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose

30 Day Post-General

**SCHEDULE D**

**DEBTS AND OBLIGATIONS**

Including Loans

(Use separate schedule(s) for each numbered line)

PAGE 5 / 6

FOR LINE NUMBER: (check only one)

3  
 10

NAME OF COMMITTEE (In Full)  
My Committee

A Full Name (Last, First, Middle Initial) of Debtor or Creditor  
Frank's Communications

Nature of Debt (Purpose).  
Radio Ad (see Schedule E)

Mailing Address  
0000 First Street

City State ZIP Code  
Big City NE 00000

Transaction ID: SD10.4104

Outstanding Balance Beginning This Period  
150000.00

Amount Incurred This Period  
0.00

Payment This Period  
150000.00

Outstanding Balance at Close of This Period  
0.00

19-03-2002

**SCHEDULE E (FEC Form 3X)**

**ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 5 / 6

FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)  
My Committee

FEC IDENTIFICATION NUMBER ▼

Full Name (Last, First, Middle, Initial) of Payee  
Frank's Communications

Purpose of Expenditure  
Radio AD (see 12 Day Pre-General)

Category Type

Mailing Address  
0000 First Street

City State Zip Code  
Big City NE 00000

Name of Federal Candidate supported or opposed by expenditure:  
Bob for Senate

Date  
M M D D Y Y Y Y  
10 20 2002

Amount  
150000.00

Office Sought: House  
X Senate  
Presidential

Transaction ID: SE24 4107

State: RI District: \_\_\_\_\_  
Check One: X Support Oppose

SAMPLE

April 21, 2003

Ms. Alissa V. Sagri  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: NARAL Pro-Choice America PAC  
FEC ID No. C00079541

Dear Ms. Sagri:

This is in response to your letter dated April 2, 2003 concerning the Amended Post-General Report (10/17/02-11/25/02) of the above referenced Committee.

You have asked about the dates of public dissemination of certain independent expenditures made by NARAL Pro-Choice America PAC (the "Committee"). The dates of public dissemination and the dates of payment for the Squier, Knapp, Dunn expenditures on behalf of Tom Strickland were October 29, 2002, as reported. The date of payment for the GMMB expenditure on behalf of Jeanne Shaheen was October 24, 2002 and the date of public dissemination was October 26, 2002. The Committee reported the earlier of the two dates on its report.

We hope that this information adequately addresses your question. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Cassandra F. Lentchner  
Counsel to NARAL Pro-Choice America PAC