



From: RAD
To: Elaine Devine - CELA

RAD REFERRAL: 05L-07

TITLE: MIKE THOMPSON FOR CONGRESS
DATE RECEIVED: February 17,2005

DATE TRANSMITTED: February 18,2005

NOTES:

25190262421



FEDERAL ELECTION COMMISSION
WASHINGTON, D C. 20463

February 17, 2005

MEMORANDUM

TO: LAWRENCE H. NORTON
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

ROBERT J. COSTA
DEPUTY STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF MIKE THOMPSON FOR CONGRESS

Mike Thompson for Congress ("The Committee") is being referred to the Office of General Counsel for amending its 2004 October Quarterly Report in order to disclose additional disbursements totaling \$65,115.00, a 49.19% increase in financial activity reported over the original 2004 October Quarterly Report. According to the 2003-2004 *RAD Review and Referral Procedures for Authorized Committees (Standard 7)*, this matter requires further examination by your office. Please note, due to the amount of additional debt disclosed, RAD would recommend that this referral be sent to the Office of Alternative Dispute Resolution for further processing.

The Committee is the Principal Campaign Committee for Mike Thompson, a candidate in the 2003-2004 Election Cycle in California's First (1st) Congressional District. The candidate won the November 2, 2004 General Election receiving 67% of the vote.

Copies of any reports or letters filed by the Committee or sent by the Reports Analysis Division and referenced in this referral are available for your review on the FEC Imaging System or web site.

If you have any questions regarding this referral, please contact Jill Sugarman at 694-1165.

Attachments

25190262422

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: February 17, 2005

ANALYST: Jill Sugarman

I. COMMITTEE: Mike Thompson for Congress
(C00326363)
Tom Hannigan, Treasurer
5429 Madison Avenue
Sacramento, CA 95841

II. RELEVANT STATUTE: 11 CFR §104.3(b)
2 U.S.C. §434(b)

III. BACKGROUND:

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

On October 20, 2004, Mike Thompson for Congress ("the Committee") filed an amended 2004 October Quarterly Report disclosing additional disbursements totaling \$65,115.00, an increase over the financial activity reported in their original 2004 October Quarterly Report. (Image 24971864028) (Attachment 2)

On October 15, 2004, the Committee originally filed the 2004 October Quarterly Report covering the period from July 1, 2004 to September 30, 2004. The original report disclosed \$132,361.05 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 24981354858).

On October 20, 2004, the Committee filed an Amended 2004 October Quarterly Report which disclosed \$197,476.05 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 24971864031).

On December 9, 2004, a Request for Additional Information ("RFAI") was sent to the Committee referencing the 2004 Amended October Quarterly Report, dated October 20, 2004. The RFAI asked for clarification regarding the additional disbursements that were not disclosed in the original filing (Image 24038662636).

On January 26, 2005, the RAD Analyst called Rita Copeland, the Assistant Treasurer of the committee, to discuss the RFAI referencing the 2004 Amended October

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On January 26, 2005, the RAD Analyst called Rita Copeland, the Assistant Treasurer of the committee, to discuss the RFAI referencing the 2004 Amended October Quarterly Report. The Analyst stated that the RFAI was sent to the Committee concerning the increased disbursement activity on the amended report. The Analyst advised Ms. Copeland that the matter may be subject to further investigation by the FEC and encouraged her to file an amendment to explain why the additional activity was not included in the original report. Ms. Copeland said that she never received the RFAI, but that she would respond with an amendment as soon as possible (Attachment 3).

On January 27, 2005, the Committee filed a second Amended 2004 October Quarterly Report which included a statement explaining that the original report failed to include a payment made on September 30, 2004 of \$65,115.00 to "Joe Slate White & Co." for a media buy. This item and additional accrued expenses were inadvertently left off the original report (Image 25970032514).

To date, no further communications have been received from the Committee regarding these matters.

25190262424

THOMPSON, MIKE

ID #H8CA01109

MIKE THOMPSON FOR CONGRESS
 Hannigan, Tom
 FILING FREQUENCY: QUARTERLY

5429 Madison Avenue

Sacramento

HOUSE
 CA 95841

ID #C00326363

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	8/06/2003	4	23991683260						
1			A	8/07/2003	11	23991687320						
1			A	11/19/2003	19	23992313341						
1			A	9/29/2004	13	24962339665						
MS			4	2/12/2004	3	24990499416						
MS			4	2/18/2004	2	24990520539						
MS			4	2/24/2004	2	24990656951						
MS			4	2/24/2004	2	24990656993						
MS			4	3/01/2004	2	24990701017						
MS			4	3/01/2004	2	24990701811						
MS			4	10/18/2004	2	24962551526						
MS			4	10/19/2004	2	24962561211						
MS			4	10/19/2004	2	24962574763						
MS			4	10/21/2004	2	24962628540						
MS			4	10/22/2004	2	24962706404						
MS			4	10/22/2004	3	24962706609						
MS			4	10/25/2004	2	24962712580						
MS			4	10/28/2004	3	24962718244						
MS			4	10/29/2004	2	24962722287						
MS			4	10/29/2004	2	24962725029						
MS			4	11/02/2004	2	24962823275						
RQ			1	7/22/2003	3	23038151739	7/22/2003					
RQ	Q2		2	8/05/2003	3	23038181817	4/01/2003 6/30/2003					
RQ	Q3		2	10/28/2003	3	23038233066	7/01/2003 9/30/2003					
RQ	Q3		2	12/09/2004	3	24038662636	7/01/2004 9/30/2004					
3	Q1	N	P	4/15/2003	105	23990757925	1/01/2003 3/31/2003	236494	85667	112147	210014	8850
3	Q1	A	P	4/21/2003	105	23990800214	1/01/2003 3/31/2003	236494	85667	112147	210014	10045
3	Q1	A	P	4/30/2003	107	23990854041	1/01/2003 3/31/2003	236494	85667	112647	209514	10045
3	Q1	A	P	5/02/2003	107	23990862891	1/01/2003 3/31/2003	236494	85667	112147	210014	10045

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THOMPSON, MIKE

ID #H8CA01109

MIKE THOMPSON FOR CONGRESS
 Hannigan, Tom
 FILING FREQUENCY: QUARTERLY

5429 Madison Avenue

Sacramento

HOUSE
 CA 95841

ID #C00326363

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	Q1	A	P	6/27/2003	107	23991182032	1/01/2003 3/31/2003	236494	85667	112147	210014	10045
3	Q1	A	P	10/20/2003	107	23992201171	1/01/2003 3/31/2003	236494	85667	112147	210014	10045
3	Q2	N	P	7/11/2003	186	23991327349	4/01/2003 6/30/2003	210014	175352	135721	249644	11827
3	Q2	A	P	8/14/2003	187	23991711304	4/01/2003 6/30/2003	210014	175352	135721	249644	11827
3	Q2	A	P	10/21/2003	187	23992207386	4/01/2003 6/30/2003	210014	175352	135721	249644	11827
3	Q3	N	P	10/15/2003	159	23992122659	7/01/2003 9/30/2003	249644	150663	114397	285910	6943
3	YE	N	P	1/30/2004	248	24990376020	10/01/2003 12/31/2003	285910	182420	143401	324930	10253
3	12P	N	P	2/19/2004	44	24990535109	1/01/2004 2/11/2004	324930	34745	41409	318265	645
3	12P	A	P	4/15/2004	47	24991035607	1/01/2004 2/11/2004	324930	37815	41602	321143	645
3	Q1	N	P	4/15/2004	101	24991054508	2/12/2004 3/31/2004	321143	101147	80387	341903	2869
3	Q1	A	P	7/15/2004	102	24961841677	2/12/2004 3/31/2004	321143	101147	80387	341903	5469
3	Q2	N	G	7/15/2004	150	24981251559	4/01/2004 6/30/2004	341903	191149	143160	389892	5921
3	Q2	A	G	7/16/2004	202	24961878129	4/01/2004 6/30/2004	341903	191149	143160	389892	5921
3	Q2	A	G	10/15/2004	202	24981354173	4/01/2004 6/30/2004	341903	191149	143160	389892	12174
3	Q3	N	G	10/15/2004	213	24981354855	7/01/2004 9/30/2004	389892	172118	199761	362250	5443
3	Q3	A	G	10/20/2004	216	24971864028	7/01/2004 9/30/2004	389892	172118	264876	297135	5443
3	Q3	A	G	1/27/2005	216	25970032299	7/01/2004 9/30/2004	389892	172118	264876	297135	5443
3	12G	N	G	10/21/2004	23	24962627631	10/01/2004 10/13/2004	297135	12025	38800	270359	6415
3	12G	A	G	10/30/2004	24	24962726259	10/01/2004 10/13/2004	297135	12025	39538	269622	9432
3	30G	N	G	12/01/2004	122	24991328923	10/14/2004 11/22/2004	269622	102575	130294	241902	1385
3	YE	N	P	1/31/2005	81	25970137668	11/23/2004 12/31/2004	242316	45827	66806	221337	14339
TOTAL									1256758	1272329		

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Mike Thompson for Congress
2004 October Quarterly Report/Amended 2004 October Quarterly Report
Overview of Disbursement Variance

Line	Original 2004 October Quarterly Report (Image 24981354858)	Amended 2004 October Quarterly Report (Image 24971864031)	Disbursement Variance Amount
17	\$132,361.05	\$197,476.05	\$65,115.00

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Communication Log

Date/Time: 01/26/2005 03:05 PM

ID: C00326363

Name: Mike Thompson for Congress

Phone: (916) 348-9100

E-Mail Address:

Candidate: Mike Thompson

Type: Phone Call

Contact: Rita Copeland

Title: Assistant Treasurer

Communications Category Type: RFAI

Summary: I called Ms. Copeland in regard to the RFAI sent on the Amended October Quarterly Report. The amended report disclosed a substantial increase in the amount of disbursements compared to the original Q3 Report. I let Ms. Copeland know that the matter may be subject to further investigation by the FEC and I encouraged her to file an amendment to clarify and/or explain why the additional activity was not included in the original report. Ms. Copeland said she never received the RFAI, but would respond with an amendment as soon as possible.

Additional Remarks:

Analyst: Jill Sugarman

Branch: Authorized

AF#:

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