

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: March 18, 2005

ANALYST: William Wiquist

- I. COMMITTEE: Community Action Program – PAC
(SSF of National Community Action
Foundation Inc.)
(C00163048)
Cathy Hoskins, Treasurer
810 First Street, N.E., Suite 530
Washington, D.C. 20002
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A)
11 C.F.R. §104.3(a)(2)(i)(A) and (B)
- III. BACKGROUND:

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

The Community Action Program – PAC (SSF of National Community Action Foundation Inc.) (“the Committee”) filed an Amended 2003 Mid-Year Report on March 16, 2004 to disclose additional receipts totaling \$106,779.79 (Image 24990761322).

On July 30, 2003, the Committee originally filed its 2003 Mid-Year Report covering the period of January 1, 2003 through June 30, 2003. The original report disclosed \$18,987.83 on Line 11(a)(i) for itemized contributions from individuals/persons other than political committees and \$2,400.00 on Line 11(a)(ii) for unitemized contributions from individuals/persons other than political committees (Image 23991602200).

On March 16, 2004, the Committee filed the second of eight amendments to their 2003 Mid-Year Report. This amendment disclosed \$21,387.83 on Line 11(a)(i) for itemized contributions from individuals/persons other than political committees and \$106,779.79 on Line 11(a)(ii) for unitemized contributions from individuals/persons other than political committees (Image 24990761324) (Attachment 2).

On April 14, 2004, a Request for Additional Information (“RFAI”) was sent to the Committee. The RFAI asked for clarification regarding the additional receipts disclosed

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on Line 11(a)(ii) that were not disclosed on the Committee's original 2003 Mid-Year Report¹ (Image 24038363344).

On April 16, 2004, the Committee filed an Amended 2003 Mid-Year Report. In a memo text attached to this report, the Committee stated, "The amended report disclosed additional receipts in the amount of \$104,379.21 because these receipts were mistakenly omitted from the original report causing negative balances to occur. When the amendment [me] was done, that's when this oversight was discovered." (Image 24991079615)

On December 7, 2004, the Reports Analysis Division ("RAD") analyst called the Committee regarding the possible referral to the Office of General Counsel ("OGC"). The analyst spoke to Kelly Baker who files the FEC reports on behalf of the Committee. The analyst advised Ms. Baker that the matter of increased receipts disclosed on the Committee's Amended 2003 Mid-Year Report was referable to the Office of General Counsel. Ms. Baker stated that the Committee had forgotten to file the Line 11(a)(ii) receipts and amended the report as soon as they received an RFAI regarding the negative ending cash-on-hand balance. The analyst asked that the Committee submit any further information they had regarding the matter within one week. The analyst also asked Ms. Baker to notify the Committee's Treasurer, Cathy Hoskins, who is a board member and not located in the Committee's headquarters, and the Executive Director/Assistant Treasurer David Bradley, regarding the potential referral (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

¹ Please note that the \$2,400 increase in receipts disclosed on Line 11(a)(1) was not referenced in the RFAI sent on April 14, 2004.