



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 6, 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 RICK RENZI FOR CONGRESS

Rick Renzi for Congress ("the Committee") is being referred to the Office of General Counsel for amending its 2004 April Quarterly Report in order to disclose additional receipts totaling \$99,681.94, a 48% increase in financial activity reported over the original 2004 April 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, OGC is also handling the Committee for 2001 and 2002 reporting anomalies identified and referred by the Audit Division (Audit Referral #04-11).

The Committee is the Principal Campaign Committee for Richard George Renzi, a candidate in the 2003-2004 Election Cycle in Arizona's First (1<sup>st</sup>) Congressional district. The Candidate won the November 2, 2004 General Election receiving 58.5% 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 Anne Marie Brady at 694-1395.

Attachments

25190263117

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: May 6, 2005

ANALYST: Anne Marie Brady

I. COMMITTEE: Rick Renzi for Congress  
C00370874  
Christopher J. Ward, Treasurer  
P.O. Box 2383  
Prescott, AZ 86302

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

III. BACKGROUND:

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

On May 5, 2004, Rick Renzi for Congress ("the Committee") filed an amended 2004 April Quarterly Report disclosing additional receipts totaling \$99,681.94, a 48% increase over the financial activity reported in their original 2004 April Quarterly Report (Image 24961220312) (Attachment 2).

On April 15, 2004, the Committee filed a 2004 April Quarterly Report covering the period from January 1, 2004 to March 31, 2004. The Committee disclosed \$207,167.04 in receipts on Line 16 (Total Receipts) of the Detailed Summary Page (Image 24991072486).

On May 5, 2004, the Committee filed an Amended 2004 April Quarterly Report). The amendment disclosed \$306,848.98 in receipts on Line 16 (Total Receipts) of the Detailed Summary Page (Image 24961220314).

On June 29, 2004, RAD sent a Request for Additional Information ("RFAI") to the Committee referencing the Amended 2004 April Quarterly Report. The RFAI asked the Committee to clarify why the additional receipt activity was not disclosed in the original filing (Image 24038433422).

On March 15, 2005, the RAD Analyst called and left a message for Mr. Christopher Ward, the committee Treasurer. The Analyst mentioned the committee's potential referral to the Office of General Counsel (OGC) with regard to the increased activity in the Amended April Quarterly Report. The Analyst

25190263118

asked Mr. Ward to return the call (Attachment 3).

On March 17, 2005 the RAD Analyst called Mr. Ward to inform him about the impending OGC referral. The Analyst stated that the Committee needed to file an amendment explaining the reason for increased activity between the original and amended 2004 April Quarterly Reports. Mr. Ward explained that the problem originated from an on-going software problem. The Analyst asked Mr. Ward to file a detailed amendment clarifying the reason for the discrepancy and the extent of the problem. Mr. Ward said that he would have a response for the FEC within a few days (Attachment 4).

On March 17, 2005, the Committee filed a Miscellaneous Electronic Document describing electronic filing difficulties for the 2004 cycle. The Miscellaneous Electronic Document indicated that an ongoing problem with election cycle-to-date totals affected Column B figures for receipts in the April Quarterly report. The Committee stated, "Reports, when created, designated the activity for the 2004 cycle with correct dates however due to an internal error related to imported files, some prior cycle activity was included at filing. As a result, column B figures for virtually every line were incorrect. Numerous attempts were made to correct the problem, calls were made to the support staff at electronic filing and each time we thought it had been fixed. Prior to the April Quarterly Report filing, a file copy was made and cycle dates were re-entered in an attempt to avoid the problem. Instead the problem was made worse as indicated by your letter citing the incorrect figures in Column B" (Image 25990250638).

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

25190263119

RENZI, RICHARD GEORGE

ID #H2A201172

RICK RENZI FOR CONGRESS  
 WARD, CHRISTOPHER J.  
 FILING FREQUENCY: QUARTERLY

P.O. Box 2383

Prescott

HOUSE  
 AZ 86302

ID #C00370874

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	8/28/2003	4	23991827914						
1			A	12/11/2003	6	23992444541						
1			A	5/05/2004	6	24971217529						
1			A	5/18/2004	6	24961346839						
1			A	10/14/2004	8	24962464026						
MS			T	4/15/2003	1	23990736207						
MS			J	8/21/2003	1	23038194761						
MS			J	11/25/2003	1	23038252674						
MS			T	4/08/2004	1	24990940572						
MS			T	5/26/2004	1	24961491227						
MS			T	7/15/2004	1	24971335827						
MS			4	8/20/2004	2	24971398126						
MS			4	8/23/2004	2	24962268202						
MS			4	8/26/2004	2	24962295018						
MS			4	8/29/2004	2	24962306720						
MS			4	9/03/2004	2	24962333783						
MS			T	10/13/2004	1	24971660799						
MS			4	10/16/2004	2	24962547042						
MS			4	10/18/2004	4	24971754046						
MS			4	10/20/2004	3	24962625293						
MS			4	10/22/2004	5	24962706427						
MS			4	10/25/2004	2	24962712601						
MS			4	10/25/2004	2	24962712656						
MS			4	10/27/2004	6	24962718123						
MS			4	10/30/2004	6	24962726315						
MS			T	12/02/2004	1	24981619952						
RQ			1	7/30/2003	3	23038163993	7/30/2003					
RQ	YE		2	3/09/2004	6	24038334396	10/01/2003 12/31/2003					
RQ	Q1		2	5/18/2004	3	24038413085	1/01/2004 3/31/2004					
RQ	Q1		2	6/29/2004	3	24038433422	1/01/2004 3/31/2004					
RQ	Q2		2	8/17/2004	6	24038500747	4/01/2004 6/30/2004					

02190263120

RENZI, RICHARD GEORGE

ID #H2AZ01172

RICK RENZI FOR CONGRESS  
WARD, CHRISTOPHER J.  
FILING FREQUENCY: QUARTERLY

P.O. Box 2383

Prescott

HOUSE  
AZ 86302

ID #C00370874

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
RQ	Q3	2		10/28/2004	3	24038603832	8/19/2004 9/30/2004					
RQ	306	2		1/11/2005	5	25038690258	10/14/2004 11/22/2004					
3	Q1	N		4/15/2003	66	23990758543	1/01/2003 3/31/2003	936	209114	32170	177880	547090
3	Q1	A		10/15/2003	76	23992095054	1/01/2003 3/31/2003	1619-	218434	33043	183771	448090
3	Q1	A		3/03/2004	76	24990710981	1/01/2003 3/31/2003	1619-	218434	33043	183771	445590
3	Q1	A		4/08/2004	76	24990940496	1/01/2003 3/31/2003	1619-	218434	33043	183771	445590
3	Q1	A		9/16/2004	77	24971459523	1/01/2003 3/31/2003	1619-	218434	33043	183771	445590
3	Q2	N		7/15/2003	78	23991416414	4/01/2003 6/30/2003	177880	146390	79956	244314	490172
3	Q2	A		10/15/2003	83	23992095130	4/01/2003 6/30/2003	183771	147076	80642	250205	486172
3	Q2	A		4/08/2004	84	24990940573	4/01/2003 6/30/2003	183771	147076	80642	250205	483672
3	Q3	N		10/15/2003	73	23992094418	7/01/2003 9/30/2003	250205	122535	91974	280766	441590
3	Q3	A		4/08/2004	73	24990940657	7/01/2003 9/30/2003	250205	122535	91974	280766	439090
3	YE	N		1/31/2004	72	24990392149	10/01/2003 12/31/2003	280766	174728	50942	404551	441590
3	YE	A		4/08/2004	72	24990940730	10/01/2003 12/31/2003	280766	174728	50942	404551	439090
3	Q1	N		4/15/2004	76	24991072484	1/01/2004 3/31/2004	404551	207167	86082	525636	439090
3	Q1	A		5/05/2004	118	24961220312	1/01/2004 3/31/2004	404551	306848	86082	625317	439090
3	Q1	A		9/16/2004	119	24971459608	1/01/2004 3/31/2004	404551	306848	86082	625317	439090
3	Q2	N		7/15/2004	136	24961852396	4/01/2004 6/30/2004	625317	314077	220237	719158	439090
3	Q2	A		9/16/2004	137	24971460001	4/01/2004 6/30/2004	625317	314077	220237	719158	439090
3	12P	N	P	8/26/2004	89	24962291749	7/01/2004 8/18/2004	719158	111181	127064	703275	439090
3	12P	A	P	4/01/2005	89	25990372171	7/01/2004 8/18/2004	719158	111181	127064	703275	439090
3	Q3	N		10/15/2004	186	24981338799	8/19/2004 9/30/2004	703275	406132	215721	893685	439090
3	Q3	A		4/01/2005	186	25970204850	8/19/2004 9/30/2004	703275	406132	215721	893685	439090
3	12G	N	G	10/21/2004	53	24962678806	10/01/2004 10/13/2004	893685	70784	459795	504674	439090
3	12G	A	G	10/25/2004	53	24962712603	10/01/2004 10/13/2004	893685	70784	459795	504674	439090
3	12G	A	G	4/01/2005	55	25990372626	10/01/2004 10/13/2004	893685	79984	459795	513874	439090

25190263121

RENZI, RICHARD GEORGE

ID #H2AZ01172

RICK RENZI FOR CONGRESS  
WARD, CHRISTOPHER J.  
FILING FREQUENCY: QUARTERLY

P.O. Box 2383

Prescott

HOUSE  
AZ 86302

ID #C00370874

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	30G	N	G	12/02/2004	94	24981706206	10/14/2004 11/22/2004	504674	451598	819425	136847	350000
3	30G	A	G	12/06/2004	92	24981729507	10/14/2004 11/22/2004	504674	451598	819425	136847	350000
3	30G	A	G	2/10/2005	93	25990043899	10/14/2004 11/22/2004	504674	451598	819425	136847	350000
3	30G	A	G	4/01/2005	157	25990372989	10/14/2004 11/22/2004	513874	451598	819425	146047	350000
3	YE	N		1/31/2005	21	25980392753	11/23/2004 12/31/2004	136847	26155	22324	140677	350000
3	YE	A		4/01/2005	21	25990373186	11/23/2004 12/31/2004	146047	26155	22324	149877	350000
TOTAL									2358748	2207249		

25190263122

**Rick Renzi for Congress (C00370874)**  
**2004 April Quarterly Report/ Amended 2004 April Quarterly Report**  
**Receipt Overview**

<b>Line</b>	<b>Original 2004 April Quarterly Report (Image 24991072484)</b>	<b>Amended 2004 April Quarterly Report (Image 24961220312)</b>	<b>Receipt Variance Amount</b>
<b>16</b>	<b>\$207,167.04</b>	<b>\$306,848.98</b>	<b>\$99,681.94</b>

25190263123