

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 11, 2005

ANALYST: William Wiquist

I. COMMITTEE: Pennsylvania Medical Society Political  
Action Committee Federal  
(C00004929)  
Larry Light, Treasurer  
P.O. Box 8820  
Harrisburg, PA 17105

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A)  
2 U.S.C. §434(b)(4)  
11 C.F.R. §104.3(a)(2)  
11 C.F.R. §104.3(b)(1)

## III. BACKGROUND:

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

Pennsylvania Medical Society Political Action Committee Federal ("the Committee") filed an Amended 2003 Year End Report on October 14, 2004 disclosing additional receipts totaling \$197,650.76 and additional disbursements totaling \$173,304.68 (Image 24962447739) (Attachment 2).

On January 8, 2004, the Committee filed its original 2003 Year End Report covering the period from July 1, 2003 through December 31, 2003. The report disclosed \$625.00 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other Than Political Committees), \$9,398.50 on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other Than Political Committees), \$24,436.37 on Line 20 (Total Federal Receipts), \$0.00 on Lines 22 (Transfers to Affiliated Committees) and 29 (Other Disbursements) (Images 24990031177-78).

On January 23, 2004, prior to the January 31, 2004 filing due date for the 2003 Year End Report, the Committee filed an Amended 2003 Year End Report. This report disclosed \$625.00 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other Than Political Committees), \$9,398.50 on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons

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Other Than Political Committees), \$24,436.37 on Line 20 (Total Federal Receipts), \$0.00 on Line 22 (Transfers to Affiliated Committees) and \$250.00 on Line 29 (Other Disbursements) (Images 249900144193-4).

On October 14, 2004, the Committee filed a second Amended 2003 Year End Report which disclosed \$95,128.76 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other Than Political Committees), \$112,545.50 on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other Than Political Committees), \$222,087.13 on Line 20 (Total Federal Receipts), \$50,050.00 on Line 22 (Transfers to Affiliated Committees) and \$123,504.68 on Line 29 (Other Disbursements) (Images 24962447741-42).

On November 12, 2004, a Request for Additional Information ("RFAI") was sent to the Committee regarding the Amended 2003 Year End Report, received 10/14/04. Among other discrepancies, the RFAI asked for clarification regarding the \$197,651.00 in additional receipts and the \$173,304.00 in additional disbursements that were not disclosed on the Committee's original 2003 Year End Report or Amended Year End Report, received on 1/23/04, prior to the due date of the report (Image 24038614751).

On November 16, 2004, Dee Rosenberger, who files the FEC reports for the Committee, called the Reports Analysis Division ("RAD") analyst regarding various discrepancies, including the increase in receipts and disbursements on the Amended 2003 Year End Report. Ms. Rosenberger stated that the increase was due to a technical error that occurred during the transfer of data into the Committee's FECfile software and was reported as soon as the Committee caught the error. The Analyst explained that all financial activity by the Committee was required to be reported by the report due date but that the Committee could provide any further clarification about the matter for public disclosure (Attachment 3).

On November 19, 2004, the Committee filed a third Amended 2003 Year End Report. This report disclosed no change in the receipt and disbursement totals. The report did, however, include a memo text which stated in part, "This report was amended because of your letter of November 12, 2004 Reference Amended Year End Report (7/1/03-12/31/03) received 10/14/04 – paragraph 4 and 5 – As we were self-auditing we realized our own program which we import data from did not perform correctly, therefore we needed to disclose additional receipts totaling \$197,651 and additional disbursements totaling \$173,304." (Image 24991318043)

On December 22, 2004, the Analyst called the Committee regarding the Amended 2003 Year End Report. The Analyst spoke to Dee Rosenberger and also left a voice mail message for Larry Light, the Committee's Treasurer. The Analyst stated that the issue of increased receipts and disbursements was referable to the FEC's Office of General Counsel. After discussing other issues, the Analyst advised the Committee to provide any further clarifying information regarding this matter. Ms. Rosenberger stated that the Committee had already provided all the information it had regarding the matter (Attachment 4).

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

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