

THE HAWKEYE PAC

PO Box 7255 • Des Moines, IA 50309

November 30, 2007

Lynn M. Fraser, Assistant Director
Federal Election Commission
Alternative Dispute Resolution Office
999 E Street NW
Washington, DC 20463

RE: ADR 416

Dear Ms. Fraser:

This letter is in response to your request to provide any additional information for purposes of resolving the matter of ADR 416.

This ADR is a result of no response to a March 14, 2007 request for additional information from the Reports Analysis Division. This request required an explanation of the increase in disbursements between the original filed quarterly report of October 15, 2006 report and its subsequent amendment, filed January 30, 2007.

After receiving the request, it was misfiled and overlooked. By the time it was discovered, the response deadline had passed and it was assumed that a late response would not be accepted. I do now know that this is not the case; and I am aware that a late response is better than no response.

As a response to the original request, I can offer this additional information:

The October 15, 2006 Quarterly report was filed in a timely manner and included all known disbursements to the September 30, 2006 ending date. However, upon review of the bank statements, it was determined that a group of checks, written as disbursements to 16 Iowa legislative races on September 7, 2006 were erroneously omitted from this report.

The recognition of this error triggered a series of activities and new controls. As an amendment was necessary, the committee reviewed all previous reports. The committee established an electronic checkbook system; and audited each report to the reconciled activities. Throughout the months of December, 2006 and January, 2007, corrections were identified to reports that were filed back to the Year End report of January 31, 2006.

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After all reports were confirmed correct and reconciled with the bank statements, final amendments were filed. These amendments included the report in question.

Since that time the committee has put into place a new system of controls. The committee maintains all data in a commercial software package. Committee financial activity is recorded in both the electronic campaign filing software and an electronic checkbook program. Bank statements are reconciled against the checkbook within 15 days of the end of the month; and all disclosure reports are reconciled against these reconciled bank balances before they are filed. Complete disbursement documentation is appropriately received and maintained on the date of the disbursement.

These issues are a result of inadequately being prepared for the increased level of activity the PAC had reached in the 2006 election cycle. With better planning, communications and controls these kinds of errors will be avoided or more quickly corrected.

I look forward to your contacting me to clarify any of this information and to help me to resolve this matter. I can be reached at 515-229-0601.

Sincerely,



Gina Noll
Treasurer