

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 17, 2007

ANALYST: Edward D. Ryan

- I. COMMITTEE: National Air Traffic Controllers Association PAC
C00238725
Pat Foray, Treasurer (10/10/06-Present)
John Carr, Treasurer (09/18/00-10/09/06)
1325 Massachusetts Avenue, N.W.
Washington, DC 20005
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A)
2 U.S.C. §434(b)(2)(J)
11 C.F.R. §104.3(a)(2)(i)(A) and (B)
11 C.F.R. §104.3(a)(2)(viii)
- III. BACKGROUND:

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

The National Air Traffic Controllers Association PAC ("the Committee") filed an Amended 2006 12 Day Pre-General Report, on March 20, 2007, disclosing additional receipts totaling \$81,374.02 (Attachment 2).

On October 26, 2006, the Committee filed its original 2006 12 Day Pre-General Report, covering the reporting period of October 1, 2006 through October 18, 2006 (Image 26930519586). The report disclosed \$525.00 in receipts on Line 11(a)(i) (Itemized Contributions From Individuals/Persons Other Than Political Committees), \$5.00 in receipts on Line 11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees) and \$0.00 in receipts on

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Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 26930519588).

On March 20, 2007, the Committee filed an Amended 2006 12 Day Pre-General Report, covering the reporting period of October 1, 2006 through October 18, 2006 (Image 27930346838). The amended report disclosed \$62,742.76 in receipts on Line 11(a)(i) (Itemized Contributions From Individuals/Persons Other Than Political Committees), \$12,720.45 in receipts on Line 11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees) and \$6,440.81 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 27930346840). The amended report also contained a memo text which stated in full "Due to an administrative error regarding the 12 Day Pre-Election Report 2006, pay period 21 and bank interest, dated October 11, 2006, were not added to Line 8 Column A. Pay period 21 and bank interest have been added to this report such that Line 8 Column A equal Line 8 Column B. This correction has been made to guarantee that all subsequent reports are balanced." (Image 27930347894)

On April 11, 2007, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2006 12 Day Pre-General Report, received March 20, 2007. The RFAI requested clarification concerning, among other matters, the \$81,374.02 in additional receipts on Lines 11(a)(i), 11(a)(ii), and 17 that were not disclosed on the Committee's original 2006 12 Day Pre-General Report (Image 27039420497).

On April 19, 2007, Dan O'Brien, the Committee's Administrative Assistant, called the Reports Analysis Division (RAD) Analyst to discuss the RFAI the Committee received referencing its Amended 2006 12 Day Pre-General Report. Mr. O'Brien inquired if the memo text attached to the report was an adequate response to the RFAI. The Analyst stated that the Commission wanted to provide the Committee an additional opportunity to explain why the increased activity was not disclosed on the original report. Mr. O'Brien stated that the Committee was experiencing some computer problems and had difficulties transferring data from internal systems to the e-filing system for uploading. He also indicated that the Committee would amend the report to include a more detailed explanation (Attachment 3).

On May 11, 2007, the Committee submitted an Amended 2006 12 Day Pre-General Report, covering the reporting period of October 1, 2006 through October 18, 2006, which disclosed no change in the totals for Lines 11(a)(i), 11(a)(ii), and 17 (Image 27990046505). The amended report contained a memo text which stated in part "...We are amending the above mentioned report to address your inquiry. Specifically, the Committee determined that a data transfer error caused the failure to disclose the payroll deduction contributions and the bank interest on the original report. However, these amounts were reflected in the Column B figures of the Post-General Report filed on December 7, 2006. In

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addition, the payroll deduction contributors itemized in the Pos-General Report included the same payroll deduction contributors that should have been disclosed in the original Pre-General Report.” (Image 27990047559)

On June 8, 2007, the RAD Analyst called Mr. O’Brien and left a voicemail message stating that the matter concerning the Amended 12 Day Pre-General Report would be referred to the Alternative Dispute Resolution Office (ADRO). The Analyst asked that if there was any additional information pertinent to the matter, the Committee should disclose it by filing a Miscellaneous Electronic Submission (Form 99) (Attachment 3).

On June 13, 2007, the RAD Analyst contacted Mr. O’Brien to ask if he had any additional information or documentation that may impact this issue. Mr. O’Brien replied that they had nothing further to add to the previously submitted responses (Attachment 3).

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

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NATIONAL AIR TRAFFIC CONTROLLERS ASSOCIATION PAC
Correy, Pat Mr.
BILLING FREQUENCY: MONTHLY

1325 Massachusetts Ave. NW

Washington

NON-PARTY QUALIFIED
DC 20005

ID #C00238725

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1		A		10/10/2006	4	26960446219						
1		A		11/30/2006	4	26930565463						
RQ	M3	2		11/30/2005	3	25038931609	2/01/2005 2/28/2005					
RQ	M6	2		7/21/2006	4	26039150316	5/01/2006 5/31/2006					
RQ	M7	2		9/01/2006	4	26039180025	6/01/2006 6/30/2006					
RQ	M8	2		9/08/2006	3	26039181167	7/01/2006 7/31/2006					
	12G	2		4/11/2007	3	27039420497	10/01/2006 10/18/2006					
	30G	2		3/14/2007	5	27039402756	10/19/2006 11/27/2006					
	YE	2		3/14/2007	3	27039402753	11/28/2006 12/31/2006					
	M2	N	P	2/17/2005	14	25990072242	1/01/2005 1/31/2005	216458	121078	21000	316537	0
	M3	N	P	3/15/2005	31	25990239863	2/01/2005 2/28/2005	316537	119317	34000	401854	0
	M4	N	P	4/14/2005	123	25990457424	3/01/2005 3/31/2005	401854	178094	36220	543729	0
3	M5	N	P	5/09/2005	186	25980500001	4/01/2005 4/30/2005	543729	119530	135495	527764	0
3	M6	N	P	6/15/2005	396	25980539562	5/01/2005 5/31/2005	527764	123567	77500	573832	0
3	M7	N	P	7/14/2005	400	25970602310	6/01/2005 6/30/2005	573832	120256	77000	617088	0
3	M7	A	P	10/12/2005	401	25971142309	6/01/2005 6/30/2005	573832	120256	77000	617088	0
3	M8	N	P	8/16/2005	464	25980615962	7/01/2005 7/31/2005	617088	121560	56750	681899	0
3	M9	N	P	9/15/2005	474	25971022475	8/01/2005 8/31/2005	681899	188093	56000	813992	0
3	M10	N	P	10/12/2005	502	25971141178	9/01/2005 9/30/2005	813992	129261	111500	831754	0
3	M11	N	P	11/15/2005	922	25971462153	10/01/2005 10/31/2005	831754	132187	50000	913941	0

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Correy, Pat Mr.

ROLLING FREQUENCY: MONTHLY

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FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M12	N	P	12/19/2005	916	25971614335	11/01/2005 11/30/2005	913941	131907	49000	996849	0
3	YE	N	P	1/20/2006	931	26990086060	12/01/2005 12/31/2005	996849	140188	14000	1123037	0
3	M2	N	P	2/15/2006	22	26980103751	1/01/2006 1/31/2006	1123037	204484	10500	1317021	0
3	M3	N	P	3/17/2006	77	26990338356	2/01/2006 2/28/2006	1317021	140960	89175	1368807	0
3	M4	N	P	4/20/2006	175	26930083030	3/01/2006 3/31/2006	1368807	146697	138529	1376975	0
3	M5	N	P	5/18/2006	230	26950113419	4/01/2006 4/30/2006	1376975	153277	40974	1489279	0
	M6	N	P	6/16/2006	497	26950185303	5/01/2006 5/31/2006	1489279	160823	281400	1368702	0
	M6	A	P	8/10/2006	498	26950404572	5/01/2006 5/31/2006	1489279	160823	281400	1368702	0
	M7	N	P	7/14/2006	533	26940237394	6/01/2006 6/30/2006	1368702	160097	187000	1341800	0
	M7	A	P	9/18/2006	534	26950470976	6/01/2006 6/30/2006	1368702	160097	187000	1341800	0
	M7	A	P	9/18/2006	8	26039183899	6/01/2006 6/30/2006	-	-	-	-	-
	M8	N	P	8/10/2006	599	26930310001	7/01/2006 7/31/2006	1341800	160938	68000	1434739	0
	M8	A	P	8/11/2006	585	26950407250	7/01/2006 7/31/2006	1341800	82505	68000	1356306	0
	M8	A	P	9/29/2006	599	26960410001	7/01/2006 7/31/2006	1341800	158973	68000	1432774	0
	M9	N	P	9/18/2006	625	26950470072	8/01/2006 8/31/2006	1432774	234230	35005	1632000	0
3	M10	N	P	10/17/2006	679	26960537557	9/01/2006 9/30/2006	1632000	160484	614400	1178084	0
3	12G	N	P	10/26/2006	30	26930519586	10/01/2006 10/18/2006	1178084	530	901500	277114	0
3	12G	A	P	3/20/2007	1057	27930346838	10/01/2006 10/18/2006	1178084	81904	901500	358488	0
3	12G	A	P	5/11/2007	1057	27990046503	10/01/2006 10/18/2006	1178084	81904	901500	358488	0
3	30G	N	P	12/07/2006	1090	26940824816	10/19/2006 11/27/2006	277114	227817	174313	330618	0
3	30G	A	P	1/25/2007	1091	27930075048	10/19/2006 11/27/2006	277114	227799	174313	330600	0
3	30G	A	P	3/20/2007	1091	27930352592	10/19/2006 11/27/2006	358488	227799	174313	411974	0
3	30G	A	P	5/11/2007	1091	27930711392	10/19/2006 11/27/2006	358488	227799	174313	411974	0
3	YE	N	P	1/26/2007	1080	27940084281	11/28/2006 12/31/2006	330600	156186	31000	455786	0
3	YE	A	P	3/20/2007	1081	27930350001	11/28/2006 12/31/2006	411974	156186	31000	537160	0
3	YE	A	P	5/11/2007	1081	27990047676	11/28/2006 12/31/2006	411974	156186	31000	537160	0

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Mr. Pat Murrey

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TOTAL

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3	M2	N	P	2/16/2007	25	27960059371	1/01/2007 1/31/2007	455786	225503	2500	678789	0
3	M2	A	P	3/20/2007	26	27930351254	1/01/2007 1/31/2007	537160	225503	2500	760163	0
3	M3	N	P	3/20/2007	100	27930351500	2/01/2007 2/28/2007	760163	150799	63500	847462	0
3	M4	N	P	4/20/2007	223	27930670001	3/01/2007 3/31/2007	847462	151961	134750	864674	0
3	M5	N	P	5/18/2007	265	27990083370	4/01/2007 4/30/2007	864674	153833	31500	987008	0
3	M6	N	P	6/20/2007	561	27990166893	5/01/2007 5/31/2007	987008	154434	147958	993484	0
3	M7	N	P	7/20/2007	581	27930992090	6/01/2007 6/30/2007	993484	154897	219610	928771	0
3	M7	A	P	8/02/2007	593	27931052711	6/01/2007 6/30/2007	993484	154897	219610	928771	0
3	M8	N	P	8/20/2007	651	27990505982	7/01/2007 7/31/2007	928771	229044	158250	999566	0
3	M9	N	P	9/14/2007	648	27931190107	8/01/2007 8/31/2007	999566	154112	54020	1099658	0
TOTAL									1374583	812088		

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The National Air Traffic Controllers Association PAC (C00238725)
2006 12 Day Pre-General Report/Amended 2006 12 Day Pre-General Report
Overview of Additional Receipts

Report Line	Original 2006 12 Day Pre-General Report (Image 26930519588)	Amended 2006 12 Day Pre-General Report, received 3/20/07 (Image 27930346840)	Variance Amount
11(a)(i)	\$525.00	\$62,742.76	\$62,217.76
11(a)(ii)	\$5.00	\$12,720.45.	\$12,715.45
17	\$0.00	\$6,440.81	\$6,440.81
		Total	\$81,374.02

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