

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 29, 2007

ANALYST: Rosa Lewis

- I. COMMITTEE: Chicago Board of Options Exchange Inc.
Political Action Committee
C00100693
Alan J. Dean, Treasurer
400 South LaSalle
Chicago, IL 60605
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A) and (J)
11 C.F.R. §104.3(a)(2)

III. BACKGROUND:

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

The Chicago Board of Options Exchange Inc. Political Action Committee ("the Committee") amended its 2007 April Monthly Report to disclose additional receipts totaling \$128,715.79 (Attachment 2).

On April 18, 2007, the Committee filed its original 2007 April Monthly Report covering the reporting period from March 1, 2007 through March 31, 2007. This report disclosed \$0.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other Than Political Committees), \$0.00 in receipts on Line 11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees) and \$0.00 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 27930647809).

On May 18, 2007, the Committee filed an Amended 2007 April Monthly Report, which disclosed \$2,300.00 in receipts on Line 11(a)(i) (Itemized Contributions From Individuals/Persons Other Than Political Committees), \$124,200.00 in receipts on Line

28190280280

11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees) and \$2,215.79 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 27930735540).

On June 15, 2007, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2007 April Monthly Report, received May 18, 2007. Among other discrepancies, the RFAI requested clarification regarding the \$128,716¹ in additional receipts on Lines 11(a)(i), 11(a)(ii) and 17 that were not disclosed on the Committee's original 2007 April Monthly Report (Image 27039453432).

On July 5, 2007, the Committee filed an Amended 2007 April Monthly Report, which disclosed \$126,000.00 in receipts on Line 11(a)(i) (Itemized Contributions From Individuals/Persons Other Than Political Committees), \$500.00 in receipts on Line 11(a)(ii) (Unitemized Contributions From Individuals/Persons Other Than Political Committees) and \$2,215.79 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 27990187179).

On July 16, 2007, the Committee filed an Amended 2007 April Monthly Report. This report disclosed no change in the amount of receipts disclosed by the Committee (Image 27990305568).

Subsequently on July 16, 2007, the Committee filed a miscellaneous electronic submission (Form 99) referencing the 2007 April Monthly reporting period, which stated in full:

"Due to keypunch errors manual receipts for \$128,716 were recorded into the wrong reporting period, April instead of March. An audit of the bank statement and the FEC report revealed that the receipts were recorded to the wrong month. The receipts were updated in the PAC Manager System to reflect the correct reporting period and the April report for March activity was amended immediately. It is our intention to report receipts properly. Additional staff has been added to assist with the preparation and review of the FEC reports and reconciliations." (Image 27990305705)

On July 26, 2007, the RAD Analyst called the Committee regarding the RFAI sent referencing the Amended 2007 April Monthly Report, received May 18, 2007. The Analyst notified Ms. Irma Love, the reports preparer, that due to the increased financial activity that was not originally disclosed on the 2007 April Monthly Report, the matter would be referred to ADRO. The Analyst encouraged Ms. Love to submit any additional relevant information via a miscellaneous electronic submission (Form 99), for review by ADRO staff (Attachment 3).

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

¹ Rounded from \$128,715.79.

CHICAGO BOARD OF OPTIONS EXCHANGE INC PAC
Alan J. Dean
FILING FREQUENCY: MONTHLY

400 S. LaSalle Street

Chicago

NON-PARTY QUALIFIED
IL 60605

ID #C00100693

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
MS			T	7/16/2007	1	27990305705						
RQ	M3	2		6/15/2007	3	27039453429	2/01/2007 2/28/2007					
RQ	M4	2		6/15/2007	4	27039453432	3/01/2007 3/31/2007					
3	M2	N	P	2/21/2007	8	27950096554	1/01/2007 1/31/2007	490852	2019	9000	483872	0
3	M3	N	P	3/20/2007	15	27930354312	2/01/2007 2/28/2007	483872	23900	6500	501272	0
3	M3	A	P	3/26/2007	15	27930377698	2/01/2007 2/28/2007	483872	25763	6500	503135	0
3	M3	A	P	7/05/2007	16	27930867654	2/01/2007 2/28/2007	483872	25763	6500	503135	0
	M4	N	P	4/18/2007	9	27930647807	3/01/2007 3/31/2007	503135	0	53500	449635	0
	M4	A	P	5/18/2007	45	27930735538	3/01/2007 3/31/2007	503135	128715	53500	578351	0
	M4	A	P	7/05/2007	45	27990187177	3/01/2007 3/31/2007	503135	128715	53500	578351	0
	M4	A	P	7/16/2007	45	27990305566	3/01/2007 3/31/2007	503135	128715	53500	578351	0
	M5	N	P	5/18/2007	6	27990086465	4/01/2007 4/30/2007	578351	2344	5500	575195	0
	M5	A	P	7/05/2007	7	27930867682	4/01/2007 4/30/2007	578351	2344	5500	575195	0
	M6	N	P	6/20/2007	14	27990173568	5/01/2007 5/31/2007	575195	18562	59000	534758	0
	M6	A	P	7/05/2007	15	27930867703	5/01/2007 5/31/2007	575195	18562	59000	534758	0
3	M7	N	P	7/20/2007	18	27990338943	6/01/2007 6/30/2007	534758	53033	12500	575291	0
3	M8	N	P	8/15/2007	10	27990481763	7/01/2007 7/31/2007	575291	4433	19000	560725	0
3	M9	N	P	9/20/2007	9	27931226089	8/01/2007 8/31/2007	560725	0	23000	537725	0
3	M10	N	P	10/19/2007	7	27931490158	9/01/2007 9/30/2007	537725	0	16500	521225	0
TOTAL									234869	204500		

Chicago Board of Options Exchange Inc. Political Action Committee (C00100693)

**2007 April Monthly Report/Amended 2007 April Monthly Report
Overview of Additional Receipts**

Report Line	Original 2007 April Monthly Report (Image 27930647809)	Amended 2007 April Monthly Report, Received 7/16/07 (Image 27990305568)	Variance Amount
11(a)(i)	\$0.00	\$126,000.00	\$126,000.00
11(a)(ii)	\$0.00	\$500.00	\$500.00
17	\$0.00	\$2,215.79	\$2,215.79
		Total	\$128,715.79