

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 5, 2008

ANALYST: Daniel T. Buckley

I. COMMITTEE: Veterans for Victory PAC
C00400937
Russel McCurdy, Treasurer
2245 148th Avenue, NE
Bellevue, WA 98007

TYPE OF COMMITTEE Nonconnected

II. REGISTRATION: May 11, 2004

III. BACKGROUND:

The Committee was sent thirteen (13) Requests for Additional Information (RFAIs) and failed to adequately respond to twelve (12) of these requests which included reporting errors involving mathematical discrepancies, failure to provide schedules, failure to properly itemize contributions from individuals, failure to clarify public communication expenses and possible candidate fundraising and failure to clarify administrative expenses.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Mathematical Discrepancies	Amended 2005 Q1, received 4/18/05	The Committee's beginning cash balance, \$108,223.69, is greater than the ending cash balance of the Committee's previous report, \$32,407.71, a discrepancy of \$75,815.98.
Failure to Provide Supporting Schedules	Amended 2005 Q1, received 4/18/05	<p>Schedule D of the Committee's previous report disclosed two (2) debts totaling \$126,271.34 with outstanding ending balances; however, these debts were not disclosed as outstanding on this report.</p> <p>Schedule D of the Committee's report disclosed outstanding beginning balances for six (6) debts owed by the Committee which are different from the outstanding closing balances disclosed on the previous report, resulting in a missing schedule of \$167,936.61.</p> <p>Schedule D of the Committee's report disclosed one (1) debt owed by the Committee with an outstanding beginning balance. However, Schedule D of the previous report disclosed no outstanding ending balance at the close of the period, resulting in a missing schedule of \$6,371.90.</p>
Failure to Provide Supporting Schedules	2006 Q2	The Committee disclosed an incurred debt owed to a vendor as a negative amount on Schedule D totaling -\$13,106.14 without providing clarification.
Failure to Provide Supporting Schedules	Amended 2006 Q3, received 10/25/06	The Committee's report disclosed additional disbursements totaling \$15,501.19 and additional debts totaling \$159,344.33 for the reporting period.
Failure to Properly Itemize Contributions from Individuals	Amended 2005 Q1, received 9/12/05 and Amended 2005 Q2, received 9/12/05	The Committee failed to provide adequate identification for 68 of 106 of the contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 Q3 and 2005 YE	The Committee failed to provide adequate identification for 137 of 237 of the contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 Q1	The Committee failed to provide adequate identification for 19 of 39 of the contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	Amended 2006 Q2, received 8/11/06	The Committee failed to provide adequate identification for 33 of 126 of the contributions from individuals that require itemization.

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Failure to Properly Itemize Contributions from Individuals	Amended 2006 Q3, received 10/25/06	The Committee failed to provide adequate identification for 78 of 272 of the contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 12G	The Committee failed to provide adequate identification for 26 of 109 of the contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 30G	The Committee failed to provide adequate identification for 126 of 262 of the contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 YE	The Committee failed to provide adequate identification for 35 of 58 of the contributions from individuals that require itemization. The Committee failed to provide adequate identification for 499 of 1209 of the contributions from individuals that require itemization for the election cycle.
Failure to Clarify Public Communication Expenses and Possible Candidate Fundraising Expenses	2006 Q1	The Committee disclosed \$34,744.72 in disbursements made for "DIRECT MAIL FUNDRAISING EXPENSE" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.
Failure to Clarify Public Communication Expenses and Possible Candidate Fundraising Expenses	2006 30G	The Committee disclosed \$9,049.23 in disbursements made for "LIST RENTALS" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.
Administrative Expenses	2005 YE	The Committee's 2005 October Quarterly and Year End Reports disclosed disbursements totaling \$198,729.22; however, these reports disclosed limited payments for administrative expenses.
Administrative Expenses	2006 Q2	The Committee disclosed disbursements totaling \$119,503.58; however, the report disclosed limited payments for administrative expenses.

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