

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 22, 2011

ANALYST: Michelle Grant

- I. COMMITTEE: Brady for Congress  
C00311043  
Mike Karlins, Treasurer  
P.O. Box 8277  
The Woodlands, TX 77387
- II. RELEVANT STATUTES: 2 U.S.C. § 434(b)(4)  
11 CFR § 104.3(b)
- III. BACKGROUND:

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

Brady for Congress ("the Committee") amended its 2010 12 Day Pre-General Report to disclose additional disbursements which were not reported in the original report (Attachment 2).

On October 21, 2010, the Committee filed the original 2010 12 Day Pre-General Report covering the period of October 1, 2010 through October 13, 2010 (Image 10991767738). This report disclosed \$10,793.86 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page and \$0.00 in disbursements on Line 21 (Other Disbursements) of the Detailed Summary Page (Attachment 2, Image 10991767741).

On January 31, 2011, the Committee filed an Amended 2010 12 Day Pre-General Report (Image 11990170133). This report disclosed \$12,888.59 in disbursements on Line 17 of the Detailed Summary Page and \$50,000.00 in disbursements on Line 21 of the Detailed Summary Page (Image 11990170136).

On February 15, 2011, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2010 12 Day Pre-General Report, received

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January 31, 2011. Among other items, the RFAI requested clarification regarding the substantial increase in disbursements that were not disclosed on the original 2010 12 Day Pre-General Report (Image 11330005214).

On March 22, 2011, the Committee filed another Amended 2010 12 Day Pre-General Report (Image 11930540330). This report disclosed \$10,855.44 in disbursements on Line 17 of the Detailed Summary Page and \$50,000.00 in disbursements on Line 21 of the Detailed Summary Page (Attachment 2, Image 11930540333).

On the same day, the Committee filed a Miscellaneous Electronic Submission (FEC Form 99) in response to the RFAI. In part, the Committee stated:

“As regarding the increase in disbursements on the Amended 12 Day Pre-General Report, a review of records found a clerical error, resulting in duplicated disbursements and the duplicates were removed. There was also a single contribution that was discovered to not be included in the original filing, also due to clerical error. This contribution was included in the amended filing” (Image 11990319903).

On March 25, 2011, the Reports Analysis Division (RAD) Analyst left a message for Francine Stanfield, Assistant Treasurer, stating that the Commission received their response regarding the increase in activity on the Amended 2010 12 Day Pre-General Report. The Analyst explained that the Committee was being referred for further action by the Commission for the increase in disbursements and that the Committee had the option to submit another response to the issue (Attachment 3).

On April 6, 2011, Ms. Stanfield contacted the RAD Analyst and informed her that she had spoken to other Commission offices regarding the referral process. She asked if there was anything else that the Committee could do. The Analyst verified that the Committee filed a timely response to the issue and any further response was not required. However, the Committee had the option to submit any additional information for the public record (Attachment 3).

To date, no further communications have been received from the Committee regarding these matters.

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