

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 7, 2011

ANALYST: Robin Kelly

- I. COMMITTEE: Bob Goodlatte for Congress Committee
C00257956
Kenneth Lorenz Prickitt, Treasurer
P.O. Box 292
Roanoke, VA 24002
- II. RELEVANT STATUTES: 2 U.S.C. § 434(b)
11 CFR § 104.3(a)
- III. BACKGROUND:

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

Bob Goodlatte for Congress Committee ("the Committee") amended its 2011 April Quarterly Report to disclose additional receipts totaling \$126,977.75 that were not reported on the original 2011 April Quarterly Report (Attachment 2).

On April 15, 2011, the Committee filed the original 2011 April Quarterly Report covering the period from January 1, 2011 through March 31, 2011. The report disclosed \$0.00 in receipts on Line 11(a)(iii) (Total of Contributions from Individuals), Line 11(c) (Contributions from Other Political Committees) and Line 15 (Other Receipts) of the Detailed Summary Page (Image 11930684937).

On May 4, 2011, the Committee filed an Amended 2011 April Quarterly Report. The report disclosed \$75,969.00 in receipts on Line 11(a)(iii), \$50,500.00 in receipts on Line 11(c) and \$508.75 in receipts on Line 15 of the Detailed Summary Page (Image 11931296052).

On June 17, 2011, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2011 April Quarterly Report, received May 4, 2011.

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The RFAI requested clarification regarding the substantial increase in receipts that were not disclosed in the original report (Image 11330010703).

On June 23, 2011, Molly Koon, a representative of the Committee, called the Reports Analysis Division (RAD) Analyst. Among other items, Ms. Koon asked how to respond to the RFAI sent regarding the Amended 2011 April Quarterly Report. The Analyst suggested that Ms. Koon submit a Miscellaneous Electronic Submission (Form 99) to explain the reason for the increase (Attachment 3).

On June 28, 2011, the Committee filed a Form 99 in response to the RFAI (Image 11931745365). In part, the Committee stated:

"The zero disclosures in receipts and disbursements that appeared on the April 15 report was [*sic*] in error due to a software problem when uploading the file. The error was not discovered until two weeks later. The receipts and disbursements on the amended report are what should have appeared on the April 15 filing. Our software provider, Aristotle, was contacted and the error corrected to allow the May 4 filing of the amended report."

On September 21, 2011, the RAD Analyst called the Treasurer, Ken Lorenz Prickett, and left a message for him to return the call. Mr. Prickett called the Analyst on September 22, 2011. The Analyst explained that there was a substantial increase in activity on the Amended 2011 April Quarterly Report and that this issue would be referred for further Commission action. Mr. Prickett said that the report contained the information when he was presented with the hard copy, and that it appeared the error occurred when the report was transmitted to the Commission. He said he would look into the matter. The Analyst advised him to file a Form 99 if he wanted to provide further clarification on the issue (Attachment 3).

To date, no further communications have been received from the Committee regarding this matter.

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