

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 14, 2013

ANALYST: Laura Beaufort

I. COMMITTEE: Mica for Congress
C00283051
W. Edward Langdon, Treasurer
P.O. Box 181546
Casselberry, FL 32718

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)

Mica for Congress ("the Committee") amended its 2012 12 Day Pre-Primary Report to disclose additional disbursements of \$144,297.14, which were not reported in the original report (Attachment 2).

On August 2, 2012, the Committee filed the original 2012 12 Day Pre-Primary Report covering the period from July 1, 2012 through July 25, 2012 (Image 12952610203). The report disclosed \$430,990.67 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 12952610206).

On August 6, 2012, the Committee filed an amended 2012 12 Day Pre-Primary Report. The report disclosed no changes in activity from the original report (Image 12971842927).

On October 13, 2012 and November 21, 2012, the Committee filed Amended 2012 12 Day Pre-Primary Reports (Images 12954352045 and 12940760526, respectively). The reports disclosed \$575,287.81 in disbursements on Line 17 of the

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Detailed Summary Page, an increase of \$144,297.14 from the original report (Images 12954352048 and 12940760529, respectively; Attachment 2).

On January 3, 2013, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2012 12 Day Pre-Primary Report, received November 21, 2012. The RFAI requested clarification regarding the substantial increase in disbursements that were not disclosed in the original filing (Image 13330019279).

On January 31, 2013, the Committee filed a Miscellaneous Electronic Submission ("Form 99") in response to the RFAI which stated, in part:

"The disbursement of \$144,297.14 was made via a wire transfer from a secondary campaign bank account that normally has little activity to the account of the campaign's television ad agency for purchase of future advertising time on local television stations. Due to a clerical error, the paper confirmation of the disbursement was not included in the file of paperwork for data entry in a timely manner and the bank statement for the account was not received when the Pre-Primary Report was prepared. It was therefore inadvertently excluded from the Pre-Primary report.

Upon discovery of the error it was corrected in an amended report listing the payee, the amount, and the purpose of disbursement" (Image 13960601870).

On February 20, 2013, the RAD Analyst called Edward Langdon, the Committee's treasurer, to inform him that the Committee may be referred for further Commission action due to the substantial increase in disbursements on the Amended 2012 12 Day Pre-Primary Report, received November 21, 2012. The Analyst advised him to submit another response if he wanted to provide further clarification. Mr. Langdon said that he and the Congressman had thought about the response carefully and that there was nothing else he could add. He said that he understood the serious nature of the problem and that they would do everything they could to prevent this from happening in the future (Attachment 3).

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

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