

## REPORTS ANALYSIS DIVISION REFERRAL

TO

## ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: August 28, 2013

ANALYST: Brian Jones

I. COMMITTEE: National Right to Life Victory Fund  
C00509893  
Joseph Landrum, Treasurer  
512 10<sup>th</sup> St. NW  
Washington, DC 20004

II. RELEVANT STATUTE: 2 U.S.C. § 434(b)(2)  
11 CFR § 104.3(a)

## III. BACKGROUND:

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

The National Right to Life Victory Fund ("the Committee") amended its 2012 12 Day Pre-General Report to disclose additional receipts totaling \$200,000.00, which were not disclosed on the original report (Attachment 2).

On October 25, 2012, the Committee filed the original 2012 12 Day Pre-General Report covering the period from October 1, 2012 through October 17, 2012. The report disclosed \$328,070.09 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) of the Detailed Summary Page (Image 12961026120, Attachment 2).

On December 6, 2012, the Committee filed an Amended 2012 12 Day Pre-General Report. The report disclosed \$528,070.09 in receipts on Line 11(a)(i) of the Detailed Summary Page, a total increase of \$200,000.00 from the original report (Image 12962968215, Attachment 2). The Committee attached memo text to the report which stated "This amended report includes donor data and operating expenditures not in the original report" (Image 12962968218).

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On May 31, 2013, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2012 12 Day Pre-General Report, received December 6, 2012. Among other issues, the RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2012 12 Day Pro-General Report that were not disclosed in the original filing (Image 13330032731).

On July 3, 2013, the Committee filed an Amended 2012 12 Day Pre-General Report with no change in receipts from the previous amendment (Image 13963190187, Attachment 2). The Committee attached memo text to the report which stated, in part: "This amended report is filed in response to an RFAI from the Commission. In response to the first item, some contributions received, particularly near the end of the reporting period, were inadvertently omitted" (Image 13963190190).

On July 11, 2013, the Reports Analysis Division (RAD) Analyst left a voicemail for Joseph Landrum, the Committee's treasurer. The Analyst called regarding the RFAI referencing the increase in receipts disclosed on the Amended 2012 12 Day Pre-General Report, received December 6, 2012 and asked Mr. Landrum to return his call (Attachment 3).

On July 16 2013, the RAD Analyst spoke with Mr. Landrum. The Analyst stated that the increase in financial activity disclosed on the Committee's Amended 2012 12 Day Pre-General Report may be referred for further action to the Commission. Mr. Landrum stated that the Committee already provided additional information via memo text on the Amended 2012 12 Day Pre-General Report, received July 3, 2013. The Analyst informed Mr. Landrum that the Committee has the option to provide additional information on the public record via a Miscellaneous Electronic Submission ("Form 99") (Attachment 3).

On July 18, 2013, the Committee filed a Form 99. The Committee stated, in full:

"In its amended pre-general election report covering 10-1-12 through 10-17-12, filed 12-6-12, the Committee reported an additional \$200,000 in donations not on the original report. These donations had been wired directly into our bank account and were not in our books at the time the original report was filed. The monthly bank statement was not available at that time. The additional donations were noted, and the amended report filed, at the time the post-general report was filed" (Image 13964101326).

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

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