

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 13, 2013

ANALYST Ben Holly

I. COMMITTEE

Nolan for Congress Volunteer Committee
C00499053
Daniel Shane Heggerston, Treasurer
P.O. Box 252
40138 Sawmill Road
Emily, MN 56447

II. RELEVANT STATUTES:

11 CFR §104.3(b)
2 U.S.C. § 434(b)(4)

III. BACKGROUND:

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

The Nolan for Congress Volunteer Committee ("the Committee") amended its 2012 October Quarterly Report to disclose an increase in disbursements of \$230,423.83 (Attachment 2).

On October 15, 2012, the Committee filed the original 2012 October Quarterly Report covering the period from July 26, 2012 through September 30, 2012. The report disclosed \$79,566.59 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 12972671686, Attachment 2).

On January 10, 2013, the Committee filed an Amended 2012 October Quarterly Report. The report disclosed no change in disbursements from the original report (Image 13960112010).

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On March 27, 2013, the RAD Analyst received a call from Jennifer May, a Committee representative, who informed the Analyst that she would be handling compliance for the Committee from that point forward (Attachment 3).

On April 26, 2013, the Committee filed an Amended 2012 October Quarterly Report. The report disclosed \$309,990.42 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$230,423.83 from the original report (Image 13962133496, Attachment 2).

On May 17, 2013, a Request for Additional Information (RAI) was sent to the Committee, referencing the Amended 2012 October Quarterly Report, received April 26, 2013. The RAI requested clarification regarding the substantial increase in disbursements disclosed on the report that were not disclosed in the original filing (Image 13330031944).

On June 21, 2013, the Committee filed a Miscellaneous Electronic Submission ("Form 99"), which stated, in part:

"...You ask about changes in the disbursements on the reports listed above. After the 2012 election, the Committee engaged a new vendor to prepare and file its reports. During a review of its reports, the Committee discovered some mistakes in the filings prepared by its previous report-preparer and asked its new vendor to undertake a complete review of its 2011 and 2012 reports. After the review, the Committee filed an omnibus set of amendments to correct the public record" (Image 13940949715).

On August 12, 2013, the RAD Analyst spoke with Ms. May and informed her that the increased activity disclosed on the Amended 2012 October Quarterly Report, received April 26, 2013, would be referred to another office for further Commission action. Ms. May explained that she no longer handled compliance for the Committee. She said the Analyst should contact Ms. Vicki Winpisinger, the current compliance consultant for the Committee (Attachment 3).

On the same day, the RAD Analyst spoke with Ms. Winpisinger and informed her that the increased activity disclosed on the Amended 2012 October Quarterly Report, received April 26, 2013, would be referred to another office for further Commission action. The Analyst noted the Committee's initial Form 99 response, received June 21, 2013, and said the Committee had an option to provide further clarification on this matter for the public record. Ms. Winpisinger said she would consult with Ms. May and Committee representatives regarding the matter and call back (Attachment 3).

On August 30, 2013, the RAD Analyst left messages with Ms. Winpisinger requesting an update on whether the Committee planned to provide further clarification on this matter for the public record (Attachment 3).

On September 4, 2013, the RAD Analyst left another message requesting an update. Later that day, Ms. Winpisinger left a voicemail message stating that the Committee would not be submitting any additional information (Attachment 3).

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

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