

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 6, 2015

ANALYST: Vicki Davis

- I. COMMITTEE: Headrick for Congress
C00559062
Sunny Jewel Murray, Treasurer (6/16/14 - Present)
PO Box 218
Maynardville, TN 37807-0218
- II. RELEVANT STATUTES: 52 U.S.C. § 30104(b)(4)
11 CFR § 104.3(b)(2)(i)
- III. BACKGROUND:

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

Headrick for Congress ("the Committee") amended its 2014 12 Day Pre-General Report to disclose additional disbursements of \$54,311.65, not disclosed on the original report (Attachment 2).

On October 22, 2014, the Committee filed the original 2014 12 Day Pre-General Report covering the period from October 1, 2014 through October 15, 2014. The report disclosed \$10,849.49 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 14951893365).

On December 13 and December 16, 2014, the Committee filed Amended 2014 12 Day Pre-General Reports disclosing \$58,598.65 in disbursements on Line 17 (Images 14953210423 and 14953213504).

On February 1, 2015, the Committee filed an Amended 2014 12 Day Pre-General Report disclosing \$32,863.45 in disbursements on Line 17 (Image 15950591047).

Later the same day, the Committee filed three (3) additional Amended 2014 12 Day Pre-General Reports; all disclosing \$65,161.14 in disbursements on Line 17, an increase of \$54,311.65 from the amount disclosed on the original report (Attachment 2; Images 15950591201, 15950591238 and 15970255938).

On February 12, 2015, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2014 12 Day Pre-General Report. The RAI requested clarification regarding the increase in disbursements which were not disclosed on the original filing (Image 15330074612).

On February 15, 2015, the Committee filed an Amended 2014 12 Day Pre-General Report. The report disclosed no change in disbursements from the previously amended reports (Attachment 2; Image 15970266074).

On February 18, 2015, Mary Headrick, the candidate, called the Reports Analysis Division (RAD) Analyst to ask how to respond to the RAI. The Analyst advised her to file a Miscellaneous Text Submission ("Form 99") to explain the discrepancies and told her the matter may be referred to another Commission office for further action (Attachment 3).

On February 28, 2015, the Committee filed a Form 99 which stated, in part:

"On October 22, 2014 my treasurer, Sunny Murray, submitted our pregeneral report while she was traveling and, apparently, the report submission did not use the most recent data so the original pre-general report was inaccurate. On 12/13/2014 we worked together to submit our post general/fourth quarter using the correct data file and merely amending to correct candidate designations and correct double entries. We did not realize that the pregeneral on record was based on incomplete data entry.... So the primary error in the 10/22/2014 filed original pre-general report was that it was based on the wrong version of our data file. We simply do not know why this error occurred. Therefore, in answer to the income disparity, most was due to our report filing error" (Image 15950834313).

On March 17, 2015, Ms. Headrick called the RAD Analyst to inquire about terminating the Committee. The Analyst explained that the increase in disbursements matter would be referred to another Commission office for further action, and the Committee is required to continue filing until the outstanding issues have been resolved (Attachment 3).

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

15-10-01-10-10-10

O-Index (2015-2016)

Cmte. ID: C00559062 Cmte. Name: HEADRICK FOR CONGRESS

Treasurer Name: SUNNY JEWEL MURRAY Address: PO BOX 218, MAYNARDVILLE, TN 37807-0218

Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER

Form	Ip	Rpt	Ip	All	Recpt	Dt	Pgs	Begin	Img#	Beg	Cvg	Dt	End	Cvg	Dt	Ltr	Mail	Dt	Begin	Cash	Recpts	Disb	End	Cash	Debits	Loans	Debits & Loans
MS-T					2/28/2015		2	15950834313																			
MS-T					4/15/2015		1	15951156329																			
RQ2		TER		T	1/25/2015		2	15330072586		1/1/2015		1/5/2015															
RQ2		TER		A	3/15/2015		2	15330078555		1/1/2015		1/5/2015															
F3T		TER		T	1/6/2015		5	15950006500		1/1/2015		1/5/2015															
F3A		TER		A	2/1/2015		5	15950591300		1/1/2015		1/5/2015															
F3N		Q1		N	4/15/2015		5	15951156209		1/6/2015		3/31/2015															
Totals																											

O-Index (2013-2014)

Cmte. ID: C00559062 Cmte. Name: HEADRICK FOR CONGRESS

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RQ2		Q2		A	9/8/2014		2	14330060492		2/27/2014		6/30/2014															
RQ2		Q3		A	1/25/2015		3	15330072578		7/19/2014		9/30/2014															
RQ2		12G		A	2/12/2015		2	15330074612		10/1/2014		10/15/2014															
RQ2		30G		A	1/25/2015		3	15330072581		10/16/2014		11/24/2014															
F3N		Q2		N	7/11/2014		4	14941763434		3/7/2014		6/30/2014															
F3A		Q2		A	7/14/2014		37	14941784355		2/27/2014		6/30/2014															
F3A		Q2		A	10/11/2014		37	14978124093		2/27/2014		6/30/2014															
F3A		Q2		A	2/1/2015		39	15950590930		2/27/2014		6/30/2014															
F3A		Q2		A	2/1/2015		38	15950591096		2/27/2014		6/30/2014															
F3A		Q2		A	2/1/2015		38	15970255770		2/27/2014		6/30/2014															
F3N		12P		N	7/25/2014		8	14962159825		7/1/2014		7/18/2014															
F3A		12P		A	10/11/2014		10	14978124167		7/1/2014		7/18/2014															
F3A		12P		A	2/1/2015		10	15950590969		7/1/2014		7/18/2014															
F3A		12P		A	2/1/2015		11	15970255808		7/1/2014		7/18/2014															
F3N		Q3		N	10/15/2014		66	14978382862		7/19/2014		9/30/2014															
F3A		Q3		A	12/16/2014		66	14983682868		7/19/2014		9/30/2014															
F3A		Q3		A	2/1/2015		65	15950590979		7/19/2014		9/30/2014															
F3A		Q3		A	2/1/2015		68	15970255819		7/19/2014		9/30/2014															
F3N		12G		N	10/22/2014		10	14951893362		10/1/2014		10/15/2014															
F3A		12G		A	12/13/2014		34	14953210420		10/1/2014		10/15/2014															
F3A		12G		A	12/16/2014		35	14953213501		10/1/2014		10/15/2014															
F3A		12G		A	2/1/2015		36	15950591044		10/1/2014		10/15/2014															
F3A		12G		A	2/1/2015		37	15950591198		10/1/2014		10/15/2014															
F3A		12G		A	2/1/2015		37	15970255935		10/1/2014		10/15/2014															
F3A		12G		A	2/1/2015		37	15950591235		10/1/2014		10/15/2014															
F3A		12G		A	2/15/2015		37	15970266071		10/1/2014		10/15/2014															

F3N	30G	N	12/2/2014	8	14952704725	10/16/2014	11/24/2014		\$50,450	\$4,500	\$0	\$54,950	-	-	\$0
F3A	30G	A	12/13/2014	26	14953210544	10/16/2014	11/24/2014		\$38,904	\$15,431	\$51,302	\$3,032	-	-	\$0
F3A	30G	A	12/16/2014	26	14953213536	10/16/2014	11/24/2014		\$19,711	\$10,931	\$51,302	(\$20,660)	-	-	\$0
F3A	30G	A	1/6/2015	26	15950006474	10/16/2014	11/24/2014		\$19,711	\$10,881	\$51,302	(\$20,710)	-	-	\$0
F3A	30G	A	2/1/2015	28	15970255887	10/16/2014	11/24/2014		\$7,736	\$10,749	\$53,946	(\$35,460)	-	-	\$0
F3A	30G	A	2/1/2015	28	15950591272	10/16/2014	11/24/2014		\$16,534	\$29,749	\$53,946	(\$7,663)	-	-	\$0
F3N	YE	N	1/6/2015	4	15970001945	11/25/2014	12/31/2014		(\$20,710)	\$50	\$1	(\$20,662)	-	-	\$0
F3A	YE	A	2/1/2015	4	15970255972	11/25/2014	12/31/2014		(\$7,663)	\$50	\$1	(\$7,615)	-	-	\$0
F6N			8/12/2014	1	14950007055				-	-	-	-	-	-	-
F6A			10/31/2014	1	14952561994				-	-	-	-	-	-	-
F2		N	3/6/2014	3	14031193375				-	-	-	-	-	-	-
F1		N	3/6/2014	6	14031193548				-	-	-	-	-	-	-
F1		A	6/16/2014	6	14031244460				-	-	-	-	-	-	-
F6N			10/17/2014	1	14980828599				-	-	-	-	-	-	-
F6A			10/22/2014	1	14951893723				-	-	-	-	-	-	-
Totals									\$166,464	\$174,079					

O-Index (2011-2012)															
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F2		N	1/20/2012	2	12030714710				-	-	-	-	-	-	-
Totals									\$0	\$0		\$0			

Headrick for Congress (C00559062)

2014 12 Day Pre-General Report/Amended 2014 12 Day Pre-General Report

Overview of Additional Disbursements

Report Line	original 2014 12 Day Pre-General Report (Image 14951893365)	Amended 2014 12 Day Pre-General Report, received 2/15/15 (Image 15970266074)	Disbursement Variance Amount
Line 17: Operating Expenditures	\$10,849.49	\$65,161.14	\$54,311.65