

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 13, 2006

ANALYST: Bradley Decker

- I. COMMITTEE: Christian Voter Project
(C00278283)
Beverly Sheldon, Treasurer
100 S Anaheim Blvd, Suite 350
Anaheim, CA 92805
- II. RELEVANT STATUTE: 2 U.S.C. § 434(b)(4)(A)
2 U.S.C. § 434(b)(4)(H)(iii)
2 U.S.C. § 434(b)(6)(B)(iii)
2 U.S.C. § 434(g)(1) and (2)
11 C.F.R. § 104.3(b)(1)(i)
11 C.F.R. § 104.3(b)(1)(vii)
11 C.F.R. § 104.3(b)(3)(vii)(A)
11 C.F.R. § 104.4(b)(2) and (c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to File 48-Hour and 24-Hour Notices, Failure to Provide Dates of Dissemination for Independent Expenditures and Failure to Disclose All Financial Activity)

Christian Voter Project ("the Committee") failed to file eleven (11) 48-Hour Notices to support thirty-four (34) independent expenditures totaling \$245,113.73 made between January 1st and the 20th day before the 2004 General Election. The Committee also failed to file five (5) 24-Hour Notices to support eleven (11) independent expenditures totaling \$48,809.58 made less than 20 days, but more than 24 hours before the 2004 General Election. The Committee also failed to provide memo Schedule E's to disclose the date(s) of dissemination for independent expenditures totaling \$71,042.08. The debts for these expenditures were incurred on the 2004 Amended April Quarterly Report, 2004 Amended October Quarterly Report and 2004 Amended 30 Day Post-General Report; the payments were reported on Schedule E of succeeding reports during the 2004 and 2005 calendar years. Additionally, the Committee filed an Amended 2004 April Quarterly Report disclosing \$61,411.07 in additional disbursements and an

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Amended 2005 Mid-Year Report disclosing \$78,792.30 in additional disbursements. (Attachment 2).

Prior Notices listing the official filing dates for monthly filers were sent to the Committee on February 2, 2004 and August 27, 2004. These notices included a section titled *48- and 24-Hour Reports on Independent Expenditures*. This section reads: "Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1st and the 20th day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4. These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate." (Attachment 3)

2004 April Quarterly Report

On April 15, 2004, the Committee filed the 2004 April Quarterly Report covering the period from January 1, 2004 to March 31, 2004. This report disclosed \$103,151.84 in disbursements on Line 21(b) (Other Federal Operating Expenses) and \$0 on Line 24 (Independent Expenditures) of the Detailed Summary Page (Image 24991018080).

On December 2, 2004, the Committee filed an Amended 2004 April Quarterly Report covering the period from January 1, 2004 to March 31, 2004. This report disclosed \$163,374.92 in disbursements on Line 21(b) (Other Federal Operating Expenses) and \$0 on Line 24 (Independent Expenditures) of the Detailed Summary Page (Image 24981589244).

On April 8, 2005, a Request for Additional Information ("RFAI") was sent to the Committee referencing the 2004 Amended April Quarterly Report received December 2, 2004. The RFAI asked for clarification regarding the \$60,223.08 in additional disbursements that were not disclosed on the Committee's original 2004 April Quarterly Report (Image 25038771970).

On May 9, 2005 at 18:02, the Committee filed an Amended 2004 April Quarterly Report covering the period from January 1, 2004 to March 31, 2004. This report disclosed no changes in the amounts of disbursements on the Summary or Detailed Summary Pages. The report included a memo text indicating that a miscellaneous electronic submission had been filed by the Committee to respond to the RFAI sent referencing the Amended 2004 April Quarterly Report received on December 2, 2004. (Image 25990742513)

On May 9, 2005 at 17:35, the Committee filed a miscellaneous electronic submission with the Commission, which stated that the increase in disbursements noted on the Amended April Quarterly Report was the result of changes in the agency used by

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the Committee for direct mail fundraising. The Committee also explained that this agency "had been going through a transition from using in-house accounting employees to using an outside accounting firm. During that transition, some of the records and databases were not transferred fast enough. These errors were corrected, and the outside accounting firm was able to ascertain the correct data, which was reported to us (and to the Commission) as soon as possible after these corrections were found and made." (Image 25990742209)

On November 16, 2005, an RFAI was sent to the Committee referencing the Amended 2004 April Quarterly Report received May 9, 2005. The RFAI sought clarification for disbursements totaling \$140,043.01 disclosed on Schedule B supporting Line 21(b) (Other Federal Operating Expenses) that failed to indicate whether they were made on behalf of specifically identified federal candidates. (Image 25038924344)

On December 19, 2005, the Committee submitted an Amended 2004 April Quarterly Report covering the period from January 1, 2004 to March 31, 2004. This report disclosed \$46,370.32 in disbursements on Line 21(b) (Other Federal Operating Expenses) and \$117,004.60 in disbursements on Line 24 (Independent Expenditures) of the Detailed Summary Page. The report also included a Schedule E (Itemized Independent Expenditures) disclosing seven (7) independent expenditures totaling \$117,004.06 made on behalf of one (1) federal candidate. Based on the information disclosed on the Amended Report it appeared that the Committee had failed to file three (3) 48-hour Notices for six (6) independent expenditures totaling \$105,988.99 (Images 25971628089 and 25971628098 – 25971628101).

On December 30, 2005, an RFAI was sent to the Committee referencing the Amended 2004 April Quarterly Report received December 19, 2005. The RFAI noted, among another matter, that the Committee may have failed to file one (1) or more of the required 48-Hour Notices for independent expenditures disclosed on the report. Additionally, the RFAI stated that although the Commission may take further legal action, the Committee's prompt response concerning the matter would be taken into consideration. A chart was included with the RFAI identifying the six (6) independent expenditures totaling \$105,988.99, for which 48-Hour Notices had not been filed (Image 25038941150).

On January 4, 2006, Beverly Sheldon, the Committee's treasurer, contacted the Reports Analysis Division ("RAD") analyst to discuss RFAs sent on the Committee's 2004 Amended April Quarterly Report, 2004 Amended July Quarterly Report and 2005 Mid-Year Report. Ms. Sheldon explained that the Committee was attempting to be as "transparent" as possible by disclosing as independent expenditures disbursements for mailings made during 2004 and 2005 that referenced federal candidates. Ms. Sheldon also said she was concerned that, by doing this, she was exposing the Committee to the possibility of fines because it had failed to file the required notices for independent expenditures. Ms. Sheldon said she hadn't even known that the Committee's activity constituted independent expenditures at the time the reports were filed. The Analyst advised Ms. Sheldon that it was necessary for the Committee to disclose its activity

accurately and urged her to review the definition in the regulations and campaign guide of an independent expenditure. The Analyst highlighted that the Committee was responsible for determining whether or not its activity constituted independent expenditures and informed her that the Committee was also required to accurately reflect activity on its reports regardless of whether it would potentially result in a fine for not filing the required notices. The Analyst further explained that there was the possibility of enforcement action being taken against the Committee because of the missing notices. Ms. Sheldon wanted to know how to respond to the issue of missing notices since it was so long after the 2004 General Election. The Analyst recommended that the Committee submit an explanatory document in the form of a miscellaneous electronic submission to detail why the notices had not been submitted. The Analyst also informed Ms. Sheldon that the Committee would also have to amend the relevant reports because of certain information that was missing on Schedule E (Attachment 4).

2004 July Quarterly Report

On May 9, 2005, the Committee filed an Amended 2004 July Quarterly Report covering the period from April 1, 2004 to June 30, 2004. This report disclosed no disbursements on Schedule E (Itemized Independent Expenditures) supporting Line 24 of the Detailed Summary Page (Image 25990742520).

On November 16, 2005, an RFAI was sent to the Committee referencing the Amended 2004 July Quarterly Report received May 9, 2005. The RFAI sought clarification for disbursements totaling \$59,864.42 disclosed on Schedule B supporting Line 21(b) (Other Federal Operating Expenses) that failed to indicate whether they were made on behalf of specifically identified federal candidates. (Image 25038924346)

On December 19, 2005, the Committee filed an Amended 2004 July Quarterly Report covering the period from April 1, 2004 to June 30, 2004. This amended report included a Schedule E (Itemized Independent Expenditures) disclosing nine (9) independent expenditures totaling \$52,761.53 made on behalf of one (1) federal candidate. Based on the information disclosed on the amended report it appeared that the committee had failed to file one (1) 48-hour Notice for five (5) independent expenditures totaling \$37,793.16 (Images 25971628943 – 25971628947).

On December 30, 2005, an RFAI was sent to the Committee referencing the Amended 2004 July Quarterly Report received December 19, 2005. The RFAI noted, among other matters, that the Committee may have failed to file one or more of the required 48-Hour Notices for independent expenditures disclosed on the report. Additionally, the RFAI stated that although the Commission may take further legal action, the Committee's prompt response concerning the matter would be taken into consideration. A chart was included with the RFAI identifying the five (5) independent expenditures totaling \$37,793.16 for which a 48-Hour Notice was not filed (Images 25038941152-25038941154).

On January 4, 2006, Beverly Sheldon, the Committee's treasurer, contacted the Reports Analysis Division ("RAD") analyst to discuss RFAs sent on the Committee's 2004 Amended April Quarterly Report, 2004 Amended July Quarterly Report and 2005 Mid-Year Report. Ms. Sheldon explained that the committee was attempting to be as "transparent" as possible by disclosing as independent expenditures disbursements for mailings made during 2004 and 2005 that referenced federal candidates. Ms. Sheldon also said she was concerned that, by doing this, she was exposing the Committee to the possibility of fines because it had failed to file the required notices for independent expenditures. Ms. Sheldon said she hadn't even known that the Committee's activity constituted independent expenditures at the time the reports were filed. The Analyst advised Ms. Sheldon that it was necessary for the Committee to disclose its activity accurately and urged her to review the definition in the regulations and campaign guide of an independent expenditure. The Analyst highlighted that the Committee was responsible for determining whether or not its activity constituted independent expenditures and informed her that the Committee was also required to accurately reflect activity on its reports regardless of whether it would potentially result in a fine for not filing required notices. The Analyst further explained that there was the possibility of enforcement action being taken against the Committee because of the missing notices. Ms. Sheldon wanted to know how to respond to the issue of missing notices since it was so long after the 2004 general election. The Analyst recommended that the Committee submit an explanatory document in the form of a miscellaneous electronic submission to detail why the notices had not been submitted. The Analyst also informed Ms. Sheldon that the Committee would also have to amend the relevant reports because of certain information that was missing on Schedule E. (Attachment 4)

2004 October Quarterly Report

On May 9, 2005, the Committee filed an Amended 2004 October Quarterly Report covering the period from July 1, 2004 to September 30, 2004. This report included a Schedule E (Itemized Independent Expenditures) disclosing one (1) independent expenditure totaling \$3,000 made on behalf of one (1) federal candidate (Image 25990742581).

On November 16, 2005, an RFAI was sent to the Committee referencing the Amended 2004 October Quarterly Report received May 9, 2005. The RFAI sought clarification for disbursements totaling \$174,312.56 disclosed on Schedule B supporting Line 21(b) (Other Federal Operating Expenses) that failed to indicate whether they were made on behalf of specifically identified federal candidates. (Images 25038924348-25038924349)

On December 19, 2005, the Committee filed an Amended 2004 October Quarterly Report covering the period from July 1, 2004 to September 30, 2004. This amended report included a Schedule E (Itemized Independent Expenditures) disclosing ten (10) independent expenditures totaling \$97,879.13 made on behalf of two (2) federal candidates. Based on the information disclosed on the amended report it appeared that

the committee had failed to file five (5) 48-hour Notices for nine (9) independent expenditures totaling \$94,879.13 (Images 25971628998-25971629002).

On January 20, 2006, an RFAI was sent to the Committee referencing the Amended 2004 October Quarterly Report received December 19, 2006. The RFAI noted that the Committee may have failed to file one or more of the required 48-Hour Notices for independent expenditures disclosed on the report. Additionally, the RFAI stated that although the Commission may take further legal action, the Committee's prompt response concerning the matter would be taken into consideration. A chart was included with the RFAI identifying the nine (9) independent expenditures totaling \$94,879.13 for which a 48-Hour Notice had not been filed (Images 26038952840-26038952842).

2004 30 Day Post-General Report

On May 9, 2005, the Committee filed an Amended 2004 30 Day Post-General Report covering the period from October 1, 2004 to November 22, 2004. This report included a Schedule E (Itemized Independent Expenditures) disclosing one (1) independent expenditure totaling \$3,004 made on behalf of one (1) federal candidate (Image 25990742661).

On November 16, 2005, an RFAI was sent to the Committee referencing the Amended 2004 30 Day Post-General Report received May 9, 2005. The RFAI sought clarification for disbursements totaling \$109,158.36 disclosed on Schedule B supporting Line 21(b) (Other Federal Operating Expenses) that failed to indicate whether they were made on behalf of specifically identified federal candidates. (Images 25038924350-25038924352)

On December 19, 2005, the Committee filed an Amended 2004 30 Day Post-General Report covering the period from October 1, 2004 to November 22, 2004. This amended report included a Schedule E (Itemized Independent Expenditures) disclosing eleven (11) independent expenditures totaling \$71,527.93 made on behalf of one (1) federal candidate (Images 25971629048-25971629053). Based on the information disclosed on the amended report it appeared that the Committee had failed to file four (4) 24-hour Notices for five (5) independent expenditures totaling \$44,040.24.

On January 20, 2006, an RFAI was sent to the Committee referencing the Amended 2004 30 Day Post-General Report received December 19, 2005. The RFAI noted that the Committee may have failed to file one or more of the required 24-Hour Notices for independent expenditures disclosed on the report. Additionally, the RFAI stated that although the Commission may take further legal action, the Committee's prompt response concerning the matter would be taken into consideration. A chart was included with the RFAI identifying the five (5) independent expenditures totaling \$44,040.24 for which a 24-Hour Notice was not filed (Images 26038952844-26038952846).

2005 Mid-Year Report

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On July 29, 2005, the Committee filed the 2005 Mid-Year Report covering the period from January 1, 2005 to June 30, 2005. This report disclosed \$0 in disbursements on Line 21(b) (Other Federal Operating Expenses) and \$0 in disbursements on Line 24 (Independent Expenditures) of the Detailed Summary Page (Image 25970857449).

On December 21, 2005, the Committee filed an Amended 2005 Mid-Year Report covering the period from January 1, 2005 to June 30, 2005. This report disclosed \$58,857.06 in disbursements on Line 21(b) (Other Federal Operating Expenses) and \$19,935.24 in disbursements on Line 24 (Independent Expenditures) of the Detailed Summary Page (Image 25971680332). The report also included a Schedule E (Itemized Independent Expenditures) disclosing eight (8) independent expenditures totaling \$19,935.24 made on behalf of one (1) federal candidate for the 2004 general election (Images 25971680344-25971680347).

On January 13, 2006, an RFAI was sent to the Committee referencing the Amended 2005 Mid-Year Report received December 21, 2005. The RFAI sought clarification for the \$78,792.30 in additional disbursements that were not disclosed on the Committee's original 2005 Mid-Year Report. The RFAI also asked for clarification regarding the dates of dissemination for independent expenditures made for the 2004 general election but reported after the election date (Images 26038944387-26038944388).

On February 7, 2006, the RAD analyst called Beverly Sheldon to discuss the increase noted in the disbursements on the Amended 2005 Mid-Year Report. Ms. Sheldon wanted to know what the Committee should do to respond the Commission's RFAI. The Analyst told her to file a miscellaneous electronic submission to explain in detail why these expenses hadn't been included on the original report. Ms. Sheldon stated that the Committee had contracted with an outside firm to do the Committee's accounting and hadn't received the information in time to include it on the report. The Analyst explained that the issue was going to be referred to OGC because the Committee was required to disclose all financial activity when it filed its original report. Ms. Sheldon and the Analyst also discussed the Committee's Independent Expenditure discrepancies on its 2004 reports (Attachment 4).

On February 14, 2006, the Committee filed an Amended 2005 Mid-Year Report covering the period from January 1, 2005 to June 30, 2005. This report disclosed \$58,456.74 in disbursements on Line 21(b) (Other Federal Operating Expenditures) and \$20,135.56 in disbursements on Line 24 (Independent Expenditures) of the Detailed Summary Page. The report also included a memo text in response to the January 13, 2006 RFAI noting increased disbursements on the amended report. The memo text stated, "The company that does our fundraising also oversees all of the accounting for our PAC. They have a new outside accounting firm and I do not have control them [sic]. They did not send the disbursement information to me on time for the filing date, July 31, 2005." (Image 26970058574 and 26970058593)

Further Communications Referencing the 2004 April Quarterly, July Quarterly, October Quarterly, 30 Day Post General and 2005 Mid-Year Reports

On January 20, 2006, Beverly Sheldon called the RAD analyst with additional questions about the missing notices for independent expenditures disclosed on the Committee's 2004 reports. Specifically, she wanted to know how to determine which independent expenditures had required 48-Hour Notices. The Analyst explained when these notices were required and stated that a new notice was required each time a committee aggregated over \$10,000 in independent expenditures for a particular election and office sought. Ms. Sheldon again asked what type of information the Committee should include in the miscellaneous electronic submission it was planning to send to the Commission regarding missing 48-hour Notices. The Analyst informed her that she should be as detailed as possible in any document filed with the Commission. Ms. Sheldon expressed her concern over the possibility of getting fined and explained that she hadn't known that the Committee's activity could be considered independent expenditures and had been unaware of laws regarding independent expenditures. Ms. Sheldon also stated that she hadn't known the amount owed for each independent expenditure at the time it was publicly disseminated or disclosed. The Analyst explained that for the latter situation the Committee should have attempted to get an estimate from its vendors so that it could meet its legal reporting requirements. The Committee had been previously reporting independent expenditures for presidential primary elections but Ms. Sheldon said that all of the Committee's independent expenditures actually related to the 2004 General Election. The Analyst explained that the Committee would need to amend its reports to fix this reporting error (Attachment 4).

On January 23, 2006, Beverly Sheldon called the RAD analyst to ask how to use the Commission's FECfile software to report memo independent expenditures and debt schedules for independent expenditures disseminated in one reporting period and paid for in a later reporting period. The Analyst explained to Ms. Sheldon how this should be completed (Attachment 4).

On January 26, 2006, the Committee filed a miscellaneous electronic submission to respond to the RFAs sent on the amended 2004 calendar year reports, received December 19, 2005. In this document the Committee's treasurer stated that until she received RFAs from the Commission she had not thought "of the content of fundraising letters as independent expenditures" and that "upon reviewing the letters we determined that possibly a few would fall under that classification." The Treasurer further explained that after receiving RFAs from the Commission regarding missing 48-hour notices "there was no way to go back and send the 48-hour report." The Committee further noted that "since all of the bills would not be received or paid prior to the mailing of a letter, a Schedule D would need to be filed for a few [independent expenditures]." The Committee's treasurer concluded by stating that "This was a new type of transaction for me and I am sorry I overlooked it...This certainly was not done on purpose. From now on we will evaluate every letter to see if it is an independent expenditure. All I can do is explain this error and ask the Commission not to take enforcement action." (Image 26990143123)

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On February 7, 2006 at 15:35, Beverly Sheldon called the RAD analyst concerning the requirements for properly reporting independent expenditures. Specifically she wanted to know if the Committee had to amend all of its reports for 2004 to disclose the date of dissemination for independent expenditures. The Analyst explained that this was indeed a requirement that was set out in the regulations and explained how the Committee should use memo schedule E's and debt schedules to report independent expenditures disseminated in one period and paid for in a later period. Ms. Sheldon explained that the Committee had no way of knowing the total amount that was supposed to be paid at the time they made the independent expenditures because they had a "no risk contract" with a mailing firm. She referenced a recent decision by the Commission involving Committees with no risk contracts and wanted to know if this changed the Committee's reporting requirements. The Analyst stated that he was not familiar with this ruling but did not think that the reporting requirements had changed. The Analyst advised Ms. Sheldon that he would further research the issue (Attachment 4).

On February 7, 2006 at 16:09, the RAD analyst called Beverly Sheldon to confirm that the Committee was required to disclose the date of dissemination for all independent expenditures made during the 2004 calendar year and that it may require the Committee to amend its reports. The Analyst informed Ms. Sheldon that the Committee was also going to be referred to the Office of General Counsel ("OGC") for not filing required 48-Hour Notices for independent expenditures disclosed on its 2004 Amended April and July Quarterly Reports. Ms. Sheldon inquired about how a referral to OGC would proceed. The Analyst explained the process and stated that he had no information regarding whether OGC would take any further action against the committee, whether the Committee would be fined or the amount of any fine. Ms. Sheldon asked if all the information filed by the Committee would be placed on the public record and the Analyst informed her that it would. The Analyst also recommended that the Committee be as descriptive and thorough as possible when filing any documents with the Commission. The Analyst and Ms. Sheldon also discussed a referable increase noted on the Committee's 2005 Mid-Year Report (Attachment 4).

On February 13, 2006, Beverly Sheldon called the RAD analyst about an RFAI sent to the Committee on the Amended 2004 30 Day Post-General Report. The Committee had disclosed independent expenditures for the general election that were paid for after the election date and she wanted to know why this was a problem. The Analyst explained that the Commission still needed to know the date of dissemination for all of the Committee's independent expenditures and again detailed the proper way to report Independent Expenditures disseminated during one reporting period but paid for in a later reporting period. Ms. Sheldon said that she believed she had explained why the committee hadn't done this by filing the miscellaneous electronic submission on January 26, 2005 in response to an RFAI on the 2004 Amended April Quarterly Report. She went on to say that she hadn't realized that "letters to raise funds for independent expenditures were independent expenditures." The Analyst stated that it was the Committee's responsibility to properly categorize its activity and file the required 24 and 48 Hour

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Notices on time. The Analyst further clarified that at this point the notices missing for independent expenditures on the 30 Day Post-General Report would be considered "not filed" and that the Committee could submit an additional miscellaneous electronic submission if it had any new information to provide. The Analyst stated that if the Committee believed its reports accurately reflected the Committee's activities then there was no need to file additional amendments. The Analyst also informed Ms. Sheldon that the Committee still had not adequately disclosed the dates of dissemination for independent expenditures paid for after the 2004 general election (Attachment 4).

On February 22, 2006, the RAD analyst contacted Beverly Sheldon to inform her that the Committee may be referred to OGC for reporting errors on its 2005 Mid-Year report and for disclosing independent expenditures after the general election date on the 2004 30 Day Post-General Report. The Analyst stated that any independent expenditure paid for after the date it was disseminated required memo independent expenditure schedules to disclose the date of dissemination. Ms. Sheldon said that she believed the committee had already provided clarifying text on its reports to explain this situation. The Analyst stated no clarifying text was identified on the Committee's amended 30 Day Post-General Report. Ms. Sheldon then said that she had been experiencing software trouble when trying to amend her 2004 reports to disclose the dates of dissemination for independent expenditures. The Analyst informed Ms. Sheldon that, regardless of technical problems, the Commission required the Committee's reports to be accurate for the public record and urged her to contact the Reports Analysis Division if she encountered difficulties in the future. The Analyst also demonstrated how to use the FECfile software to create memo independent expenditures and informed Ms. Sheldon that the Committee would have one week to correct its reports before the issue of missing dates of dissemination was referred to OGC (Attachment 4).

On February 24, 2006, Beverly Sheldon contacted the RAD analyst because she was having trouble using the software to report "loans" for independent expenditures. The Analyst reminded her that the Committee would need to report memo schedule E entries and debt schedules to report independent expenditures publicly disseminated in one reporting period and paid for in a later reporting period. The Analyst also stated that the Committee still needed to report the original dates of dissemination for all independent expenditures made for the 2004 General Election and paid for after the election. The Analyst again highlighted that this would included independent expenditures disclosed on the Committee's Amended 2005 Mid-Year Report (Attachment 4).

Final Amendments for the 2004 April Quarterly, July Quarterly, October Quarterly, 30 Day Post General and 2005 Mid-Year Reports

On February 28, 2006, the Committee filed an Amended 2004 April Quarterly Report covering the period from January 1, 2004 to March 31, 2004. This report disclosed \$59,675.86 in disbursements on Line 21(b) (Other federal Operating Expenses) and \$104,887.05 in disbursements on Line 24 (Independent Expenditures) of the Detailed Summary Page (Image 26970077056). The report also included a Schedule E (Itemized Independent Expenditures) disclosing nine (9) independent expenditures totaling \$104,718.05 made on behalf of one (1) federal candidate. Based on the information and expenditures disclosed on the amended report, the Committee failed to file four (4) 48-Hour Notices for eight (8) independent expenditures totaling \$97,473.10. Additionally, the report disclosed \$50,906.52 in outstanding debts that appeared to be for independent expenditures disseminated during the reporting period but which were paid for in later reporting periods. The report included no memo Schedule E entries to disclose the date of dissemination for the independent expenditures corresponding to these debts (Images 26970077066-2697077075).

On February 28, 2006, the Committee filed an Amended 2004 July Quarterly Report covering the period from April 1, 2004 to June 30, 2004. This amended report included a Schedule E (Itemized Independent Expenditures) disclosing nine (9) independent expenditures totaling \$52,761.53 made on behalf of one (1) federal candidate (Images 26970077096-26970077100). Based on the information disclosed on the amended report, it appeared that the committee had failed to file two (2) 48-hour Notices for nine (9) independent expenditures totaling \$52,761.50.

On February 28, 2006, the Committee filed an Amended 2004 October Quarterly Report covering the period from July 1, 2004 to September 30, 2004. The amended report included a Schedule E (Itemized Independent Expenditures) disclosing eighteen (18) independent expenditures totaling \$97,879.13 made on behalf of two (2) federal candidates (Images 26970077158-26970077166). Based on the information disclosed on this amended report, it appeared that the Committee failed to file five (5) 48-hour Notices for seventeen (17) independent expenditures totaling \$94,879.13. Additionally, the report disclosed \$2,500 in outstanding debts that appeared to be for independent expenditures disseminated during the reporting period but which were paid for on the Amended 2005 Mid-Year Report. The report included no memo Schedule E entries to disclose the date of dissemination for the Independent Expenditures corresponding to these debts (Image 26970077157).

On February 28, 2006, the Committee filed an Amended 2004 30 Day Post-General Report covering the period from October 1, 2004 to November 22, 2004. The amended report included a Schedule E (Itemized Independent Expenditures) disclosing twenty-four (24) independent expenditures totaling \$71,527.93 made on behalf of one (1) federal candidate (Images 26970077202-26970077213). Based on the information disclosed on this amended report, it appeared that the Committee failed to file five (5) 24-

Hour Notices to support eleven (11) independent expenditures totaling \$49,023.87. Additionally, the report disclosed \$17,635.56 in outstanding debts that appeared to be for independent expenditures disseminated during the reporting period but which were paid for on the Amended 2005 Mid-Year Report. The report included no memo Schedule E entries to disclose the date of dissemination for the independent expenditures corresponding to these debts (Images 26970077198-26970077201).

On February 28, 2006, the Committee filed an Amended 2005 Mid-Year Report covering the period from January 1, 2005 to June 30, 2005. This report disclosed \$58,656.74 in disbursements on Line 21(b) (Other Federal Operating Expenditures) and \$20,135.56 in disbursements on Line 24 (Independent Expenditures) of the Detailed Summary Page (Image 26970077239). The report also included a Schedule E (Itemized Independent Expenditures) disclosing eight (8) independent expenditures totaling \$20,135.56 made on behalf of one (1) federal candidate for the 2004 General Election (Images 26970077254-26970077257).

On February 28, 2006, the Committee filed a miscellaneous electronic submission referencing the Amended 2005 Mid-Year Report. In this document the Committee stated, in part, that "all expenses paid from January 1 to June 30, 2005 were jobbed out with the mailing they paid." (Image 26970077271)

On March 14, 2006, Beverly Sheldon called the RAD analyst to inquire about the status of the OGC Referral being prepared for the Committee's 2004 April, July, October, 30 Day Post-General and 2005 Mid-Year Reports. The RAD analyst said that the referral was being processed but could not provide a timeline for when the Committee would be contacted by OGC (Attachment 4).

To date, no further communication has been received from the Committee regarding these matters.

CHRISTIAN VOTER PROJECT
Sheldon, Beverly
FILING FREQUENCY: QUARTERLY

100 S ANAHEIM BLVD SUITE 350

ANAHEIM

-PARTY QUALIFIED
CA 92805

ID #C00278283

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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1			A	9/01/2004	4	24962316581						
MS			T	8/04/2003	2	23038172996						
MS			T	6/01/2004	2	24038422154						
MS			2	9/01/2004	1	24962315765						
MS			2	11/01/2004	1	24971893158						
RQ	MY	2		6/30/2004	2	24038433797	1/01/2003 6/30/2003					
RQ	YE	2		6/30/2004	2	24038433799	7/01/2003 12/31/2003					
RQ	Q1	2		6/30/2004	3	24038433801	1/01/2004 3/31/2004					
RQ	Q1	2		4/08/2005	3	25038771970	1/01/2004 3/31/2004					
RQ	Q1	2		11/16/2005	2	25038924344	1/01/2004 3/31/2004					
RQ	Q1	2		12/30/2005	3	25038941149	1/01/2004 3/31/2004					
RQ	Q2	2		4/08/2005	3	25038771973	4/01/2004 6/30/2004					
RQ	Q2	2		11/16/2005	2	25038924346	4/01/2004 6/30/2004					
RQ	Q2	2		12/30/2005	4	25038941152	4/01/2004 6/30/2004					
RQ	Q3	2		11/16/2005	2	25038924348	7/01/2004 9/30/2004					
RQ	Q3	2		1/20/2006	4	26038952840	7/01/2004 9/30/2004					
RQ	30G	2		4/08/2005	2	25038771965	10/01/2004 11/22/2004					
RQ	30G	2		11/16/2005	2	25038924350	10/01/2004 11/22/2004					
RQ	30G	2		1/20/2006	4	26038952844	10/01/2004 11/22/2004					
RQ	YE	2		4/08/2005	3	25038771967	11/23/2004 12/31/2004					
RQ	YE	2		11/16/2005	3	25038924352	11/23/2004 12/31/2004					
RQ	YE	2		1/13/2006	3	26038944397	11/23/2004 12/31/2004					
3	MY	N	P	7/31/2003	13	23991639087	1/01/2003 6/30/2003	14581	19307	30706	3182	0
3	MY	A	P	7/29/2004	13	24962050467	1/01/2003 6/30/2003	14581	19307	30706	3182	0
3	YE	N	P	1/30/2004	13	24990365186	7/01/2003 12/31/2003	3182	43888	36663	10407	0
3	YE	A	P	7/30/2004	13	24962051638	7/01/2003 12/31/2003	3182	43888	36663	10407	0
3	Q1	N	P	4/15/2004	11	24991018077	1/01/2004 3/31/2004	10407	163390	103151	70645	0

CHRISTIAN VOTER PROJECT
Sheldon, Beverly
FILING FREQUENCY: QUARTERLY

100 S ANAHEIM BLVD SUITE 350

ANAHEIM

N-PARTY QUALIFIED
CA 92805

ID #C00278283

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	Q1	A	P	7/30/2004	12	24962051651	1/01/2004 3/31/2004	10407	163390	103151	70645	0
3	Q1	A	P	12/02/2004	13	24981589241	1/01/2004 3/31/2004	10407	163246	163374	10278	0
3	Q1	A	P	5/09/2005	13	25990742501	1/01/2004 3/31/2004	10407	163246	163374	10278	0
3	Q1	A	P	12/19/2005	17	25971628086	1/01/2004 3/31/2004	10407	163246	163374	10278	0
3	Q1	A	P	1/20/2006	17	26990087044	1/01/2004 3/31/2004	10407	163246	163374	10278	0
3	Q1	A	P	1/20/2006	17	26990087181	1/01/2004 3/31/2004	10407	163246	163374	10278	0
3	Q1	A	P	1/26/2006	19	26990126378	1/01/2004 3/31/2004	10407	163246	163374	10278	1245
3	Q1	A	P	2/13/2006	24	26990323006	1/01/2004 3/31/2004	10407	163246	164562	9090	35451
3	Q1	A	P	2/28/2006	25	26970077053	1/01/2004 3/31/2004	10407	163246	164562	9090	50967
3	Q2	N	P	6/30/2004	13	24971298035	4/01/2004 6/30/2004	70645	85938	61887	94696	0
3	Q2	A	P	7/30/2004	14	24962051927	4/01/2004 6/30/2004	70645	86376	62887	94134	0
3	Q2	A	P	12/02/2004	14	24981589417	4/01/2004 6/30/2004	10278	72716	74564	8431	0
3	Q2	A	P	5/09/2005	14	25990742517	4/01/2004 6/30/2004	10278	72716	74564	8431	0
3	Q2	A	P	12/19/2005	19	25971628930	4/01/2004 6/30/2004	10278	72716	74564	8431	0
3	Q2	A	P	1/20/2006	19	26990089106	4/01/2004 6/30/2004	10278	72716	74564	8431	0
3	Q2	A	P	1/26/2006	21	26990126397	4/01/2004 6/30/2004	10278	72716	74636	8358	0
3	Q2	A	P	2/13/2006	26	26990323030	4/01/2004 6/30/2004	9090	72716	76319	5487	34205
3	Q2	A	P	2/28/2006	26	26970077078	4/01/2004 6/30/2004	9090	72716	76319	5487	49721
3	Q3	N	P	10/15/2004	50	24962531623	7/01/2004 9/30/2004	94134	256632	237338	113428	0
3	Q3	A	P	12/02/2004	51	24981589715	7/01/2004 9/30/2004	8431	256632	240979	24084	0
3	Q3	A	P	5/09/2005	52	25990742531	7/01/2004 9/30/2004	8431	256632	240979	24084	0
3	Q3	A	P	12/19/2005	55	25971628949	7/01/2004 9/30/2004	8431	256632	240979	24084	0
3	Q3	A	P	2/14/2006	65	26990323533	7/01/2004 9/30/2004	5487	256632	242662	19457	2500
3	Q3	A	P	2/28/2006	65	26970077104	7/01/2004 9/30/2004	5487	256632	242662	19457	18015
3	30G	N	P	12/02/2004	29	24981594342	10/01/2004 11/22/2004	24084	158537	163336	19285	0
3	30G	A	P	5/09/2005	30	25990742633	10/01/2004 11/22/2004	24084	158537	163336	19285	0
3	30G	A	P	12/19/2005	35	25971629020	10/01/2004 11/22/2004	24084	158537	163152	19469	0
3	30G	A	P	2/14/2006	40	26990323605	10/01/2004 11/22/2004	19457	158537	164022	13972	20135
3	30G	A	P	2/28/2006	47	26970077169	10/01/2004 11/22/2004	19457	158537	164022	13972	20135
3	YE	N	P	1/31/2005	14	25990032200	11/23/2004 12/31/2004	19285	13059	14277	18067	0
3	YE	A	P	5/09/2005	15	25990742663	11/23/2004 12/31/2004	19285	13059	14277	18067	0
3	YE	A	P	12/19/2005	16	25971629004	11/23/2004 12/31/2004	19469	13059	14277	18251	0
3	YE	A	P	2/14/2006	20	26990323645	11/23/2004 12/31/2004	13972	13059	14329	12702	20135
3	YE	A	P	2/28/2006	20	26970077216	11/23/2004 12/31/2004	13972	13059	14329	12702	20135
TOTAL									727385	729263		

CHRISTIAN VOTER PROJECT
Sheldon, Beverly
FILING FREQUENCY: QUARTERLY

100 S ANAHEIM BLVD SUITE 350

ANAHEIM

IN-PARTY QUALIFIED
CA 92805

ID #C00278283

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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MS			T	5/09/2005	1	25990742209						
MS			T	1/04/2006	1	26990018913						
MS			T	1/04/2006	1	26990018914						
MS			T	1/26/2006	1	26990143123						
MS			T	2/28/2006	1	26970077271						

RQ	MY	2		1/13/2006	4	26038944387	1/01/2005 6/30/2005					
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RQ	YE	2		2/17/2006	3	26039000239	7/01/2005 12/31/2005					
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MY	N	P	7/29/2005	11	25970857446	1/01/2005 6/30/2005	18067	71509	1300	88277	0
MY	A	P	12/21/2005	20	25971680329	1/01/2005 6/30/2005	18251	71369	80092	9529	0
MY	A	P	2/14/2006	25	26970058571	1/01/2005 6/30/2005	12702	71509	79892	4320	0
MY	A	P	2/28/2006	25	26970077236	1/01/2005 6/30/2005	12702	71509	80092	4120	0
YE	N	P	1/26/2006	10	26990143113	7/01/2005 12/31/2005	9796	423	1903	8316	0
YE	A	P	2/14/2006	10	26970058596	7/01/2005 12/31/2005	4320	423	1903	2839	0
YE	A	P	2/28/2006	10	26970077261	7/01/2005 12/31/2005	4120	423	1913	2629	0
Q1	N	P	4/13/2006	7	26930054821	1/01/2006 3/31/2006	2629	36	557	2107	0

TOTAL

71968 82562

Christian Voter Project (C00278283)

2004 Amended April Quarterly Report, received 2/28/06
Independent Expenditure Overview

Name of Payee	Date of Expenditure (Schedule E)	Amount of Expenditure	Candidate Supported	Election
L & E Meridan	1/09/2004	\$13,985.82 48 Hour Notice Required	George W. Bush	2004 General
American Target Advertising	1/14/2004	\$3,707.70	George W. Bush	2004 General
NCS Direct	1/14/2004	\$1,627.91	George W. Bush	2004 General
ATA Postage	1/19/2004	\$20,100.47 48 Hour Notice Required	George W. Bush	2004 General
ATA Postage	2/24/2004	\$41,827.91 48 Hour Notice Required	George W. Bush	2004 General
NCS Direct	2/24/2004	\$500.00	George W. Bush	2004 General
DMP	3/15/2004	\$1,538.73	George W. Bush	2004 General
L & E Meridan	3/18/2004	\$14,184.56 48 Hour Notice Required	George W. Bush	2004 General
American Target Advertising	3/22/2004	\$7,244.91 ¹	George W. Bush	2004 General

¹ This independent expenditure appeared on the Committee's Amended 2004 April Quarterly Report, received 2/28/06; however, it did not require that a 48-hour Notice be filed. Due to the timing of this independent expenditure, it had already been disclosed on the Committee's April Quarterly Report when additional independent expenditures aggregating over \$10,000 on behalf of George W. Bush for the 2004 General Election were disseminated.

Christian Voter Project (C00278283)

2004 Amended July Quarterly Report, received 2/28/06
Independent Expenditure Overview

Name of Payee	Date of Expenditure (Schedule E)	Amount of Expenditure	Candidate Supported	Election
Admiral Envelope	4/20/2004	\$364.95	George W. Bush	2004 General
Direct Impressions	4/20/2004	\$820.06	George W. Bush	2004 General
Mail Fund	4/20/2004	\$12.95	George W. Bush	2004 General
ATA Postage	4/22/2004	\$11,897.67 48 Hour Notice Required	George W. Bush	2004 General
ATA Prepay	4/22/2004	\$24,697.50	George W. Bush	2004 General
The Viguerie Company	5/06/2004	\$3,402.84	George W. Bush	2004 General
NCS Direct	5/13/2004	\$1,200.96	George W. Bush	2004 General
American Target Advertising	6/02/2004	\$6,507.35 48 Hour Notice Required	George W. Bush	2004 General
DMP	6/02/2004	\$3,857.22	George W. Bush	2004 General

Christian Voter Project (C00278283)

2004 Amended October Quarterly Report, received 2/28/06
Independent Expenditure Overview

Name of Payee	Date of Expenditure (Schedule E)	Amount of Expenditure	Candidate Supported	Election
NCS Direct	8/06/2004	\$939.84	George W. Bush	2004 General
NCS Direct	8/06/2004	\$469.02	George W. Bush	2004 General
TRS Direct	8/06/2004	\$6,342.72	George W. Bush	2004 General
TRS Direct	8/06/2004	\$3,171.36 48 Hour Notice Required	George W. Bush	2004 General
American Target Advertising	8/16/2004	\$4,800.00	George W. Bush	2004 General
ATA Prepay	8/16/2004	\$2,400.00	George W. Bush	2004 General
American Target Advertising	8/24/2004	\$6,948.44 48 Hour Notice Required	George W. Bush	2004 General
American Target Advertising	8/26/2004	\$13,896.88 48 Hour Notice Required	George W. Bush	2004 General
L & E Meridan	8/26/2004	\$11,256.84	George W. Bush	2004 General
Admiral Envelope	9/02/2004	\$2,366.98	George W. Bush	2004 General
Admiral Envelope	9/02/2004	\$2,201.37	George W. Bush	2004 General
The Viguerie Company	9/03/2004	\$7,632.34 48 Hour Notice Required	George W. Bush	2004 General
The Viguerie Company	09/03/2004	\$12,296.40	George W. Bush	2004 General
DMP	9/23/2004	\$2,740.56	George W. Bush	2004 General
DMP	9/23/2004	\$1,370.28	George W. Bush	2004 General
ATA Postage	9/30/2004	\$10,697.40 48 Hour Notice Required	George W. Bush	2004 General
ATA Postage	9/30/2004	\$5,348.70	George W. Bush	2004 General

Christian Voter Project (C0027833)

2004 Amended 30 Day Post-General Report, received 2/28/06
Independent Expenditure Overview

Name of Payee	Date of Expenditure (Schedule E)	Amount of Expenditure	Candidate Supported	Election
DMP	10/05/2004 ¹	\$192.48	George W. Bush	2004 General
Admiral Envelope	10/06/2004 ¹	\$1,881.27	George W. Bush	2004 General
American Target Advertising	10/13/2004 ¹	\$6,063.60	George W. Bush	2004 General
AMLC	10/13/2004 ¹	\$1,022.88	George W. Bush	2004 General
Sam K Pate Associates, Inc	10/18/2004	\$1,114.29 24 Hour Notice Required	George W. Bush	2004 General
John G. Hoaas	10/19/2004	\$3,163.32 24 Hour Notice Required	George W. Bush	2004 General
DMP	10/20/2004	\$428.58	George W. Bush	2004 General
NCS Direct	10/20/2004	\$300.00	George W. Bush	2004 General
American Target Advertising	10/22/2004	\$14,751.81 24 Hour Notice Required	George W. Bush	2004 General
DMP	10/22/2004	\$214.29	George W. Bush	2004 General
American Target Advertising	10/25/2004	\$24,710.82 24 Hour Notice Required	George W. Bush	2004 General
DMP	10/26/2004	\$469.17	George W. Bush	2004 General
DMP	10/27/2004	\$428.58	George W. Bush	2004 General
DMP	10/27/2004	\$214.29	George W. Bush	2004 General
The Viguerie Company	10/27/2004	\$3,228.72 24 Hour Notice Required	George W. Bush	2004 General

¹ These independent expenditures appeared on the Committee's 2004 30 Day Post-General Report; however, they did not require that 48-Hour Notices be filed because they did not aggregate in excess of \$10,000.

Christian Voter Project (C0027833)
Overview of Missing Memo Schedule E's

Debts Incurred for Independent Expenditures – Amended 2004 April Quarterly Report	Corresponding Independent Expenditure Payments	Report Containing Corresponding Independent Expenditure Payments
\$50,906.52¹	\$1,185.01 \$34,205.57 \$15,515.94	Amended 2004 July Quarterly Amended 2004 October Quarterly Amended 2004 30 Day Post-General
Total Missing Memo Schedule E's:	<u>\$50,906.52</u>	

Debts Incurred for Independent Expenditures – Amended 2004 October Quarterly Report	Corresponding Independent Expenditure Payments	Report Containing Corresponding Independent Expenditure Payments
\$2,500	\$2,500	Amended 2005 30 Mid-Year Report
Total Missing Memo Schedule E's:	<u>\$2,500</u>	

Debts Incurred for Independent Expenditures – Amended 2004 30 Day Post-General Report	Corresponding Independent Expenditure Payments	Report Containing Corresponding Independent Expenditure Payments
\$17,635.56	\$17,635.56	Amended 2005 Mid-Year Report
Total Missing Memo Schedule E's:	<u>\$17,635.56</u>	

¹ The amount for debts incurred and still outstanding on this report is \$50,967.41. However, \$60.84 is being paid as a Federal Operating Expense on Schedule B, supporting Line 21 (b), of the Amended July Quarterly Report.

Christian Voter Project (C00278283)
Overview of Additional Disbursements

2004 April Quarterly Report/ 2004 Amended April Quarterly Report

Line	Original 2004 April Quarterly Report (Image 24991018080)	Amended 2004 April Quarterly Report (Image 26970077056)	Disbursement Variance Amount
21(b)	\$103,151.84	\$59,675.86	(\$43,475.98)*
24	\$0	\$104,887.05	\$104,887.05
Total:			\$61,411.07

*Decrease in activity

2005 Mid-Year Report/ 2005 Amended Mid-Year Report

Line	Original 2005 Mid- Year Report (Image 2597085744)	Amended 2005 Mid- Year Report (Image 26970077239)	Disbursement Variance Amount
21(b)	\$0	\$58,656.74	\$58,656.74
24	\$0	\$20,135.56	\$20,135.56
Total:			\$78,792.30

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MONTHLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

February 2, 2004

WHO MUST FILE

As a monthly filer, you must file Monthly Reports in 2004.¹

NOTE: Recent changes to the law require certain party committees to file monthly reports (quarterly reporting is no longer an option for these committees). For more information, see the January 2004 issue of the *Record*, which can be found on the FEC web site at <http://www.fec.gov/pages/record.htm>. An additional legislative change allows committees to file reports using overnight mail on the same terms as registered/certified mail. (See footnote 3.)

REPORTING DATES

REPORT	REPORTING PERIOD ²	REG./CERT. & OVERNIGHT MAILING DATE ³	FILING DATE
February	01/01/04 - 01/31/04	02/20/04	02/20/04
March	02/01/04 - 02/29/04	03/20/04	03/20/04 ⁴
April	03/01/04 - 03/31/04	04/20/04	04/20/04
May	04/01/04 - 04/30/04	05/20/04	05/20/04
June	05/01/04 - 05/31/04	06/20/04	06/20/04 ⁴
July	06/01/04 - 06/30/04	07/20/04	07/20/04
August	07/01/04 - 07/31/04	08/20/04	08/20/04
September	08/01/04 - 08/31/04	09/20/04	09/20/04
October	09/01/04 - 09/30/04	10/20/04	10/20/04
Pre-General	10/01/04 - 10/13/04	10/18/04	10/21/04
Post-General	10/14/04 - 11/22/04	12/02/04	12/02/04
Year-End	11/23/04 - 12/31/04	01/31/05	01/31/05

¹Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

²These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

³Monthly reports sent by registered or certified mail must be postmarked by the mailing date. Committees should keep the mailing receipt with its postmark as proof of filing. If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" means an overnight service with an on-line tracking system. Monthly reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

⁴Notice that the filing date falls on a weekend. Filing deadlines are not extended when they fall on nonworking days.

(over)

48- AND 24-HOUR REPORTS ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1st and the 20th day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4.

These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate. Visit the FEC web site at http://www.fec.gov/pages/charts_ie_dates.htm for a state-by-state chart of 48- and 24-hour reporting periods.

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/elecfil/electron.html>.

COMPLIANCE

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program," and visit our web site at <http://www.fec.gov/adminfines1.html>.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

MONTHLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

August 27, 2004

REPORTING DATES FOR REMAINDER OF 2004

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE ²	FILING DATE
September	08/01/04 - 08/31/04	09/20/04	09/20/04
October	09/01/04 - 09/30/04	10/20/04	10/20/04
Pre-General	10/01/04 - 10/13/04	10/18/04	10/21/04
Post-General	10/14/04 - 11/22/04	12/02/04	12/02/04
Year-End	11/23/04 - 12/31/04	01/31/05	01/31/05

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a monthly basis must file Monthly Reports in 2004. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

In an election year, the 12-Day Pre-General and 30-Day Post-General Election Reports are filed in lieu of the November and December Monthly Reports.

NOTE: A recent legislative change allows committees to file reports using overnight mail on the same terms as registered/certified mail. (See footnote 2).

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Monthly reports sent by registered or certified mail must be postmarked by the mailing date. Committees should keep the mailing receipt with its postmark as proof of filing. If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" means an overnight service with an on-line tracking system. Monthly reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

(over)

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/electfil/electron.html>.

48- AND 24-HOUR REPORTS ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1st and the 20th day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4.

These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate. Visit the FEC web site at http://www.fec.gov/pages/charts_ie_dates.htm for a state-by-state chart of 48- and 24-hour reporting periods.

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- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.