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Office of the General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

2008 DEC 30 A 11: 51

Complaint of Over Limit Contributions and Request for Audit - Obama for America (C00431445) and Obama Victory Fund (C00451393)

Discrepancies in Donor Debits (Update to MUR 6142)

Dear Sir or Madam:

This is an update to complaint, MUR 6142, pertaining to the Presidential Campaign Funds of Barack Obama. The FEC file for Barack Obama, containing all donors disclosed, contains over 2.5 million transactions (file All.zip). A single donor may have hundreds of transactions listed. These transactions show some irregularities and there are questions about the reporting. These questions involve:

- Reattribution/redesignation transactions totaling \$26 million without donor approval¹.
- Debits not reported for \$562,277 of reattribution/redesignation credits (Table II).
- Uncollected chargeback and bank return debits of \$1.9 million that do not appear to have been collected or listed as refunds².

There are 53,518 donor transactions listed as debits, for the Obama for America fund, totaling around \$32 million. They are noted in the files as is shown in the attached summary Table I, with the associated funds shown in Table II. Examination of the reattribution and redesignation records show that there is approximately \$562,277 more credited than debited for these transactions. It is understood that reattribution/redesignation is done for donors with funds over the maximum donation limit of \$2,300 per campaign. It would therefore seem that they would all be required to be reported.

Another even more disturbing issue is the amount being taken as credit for transactions where there have been requests for reattribution/redesignation that the campaign apparently does not have. This amounts to about \$26 million in funds (46,619 transactions) held by the campaign. Should these have been refunded? Some of the requests go all the way back to January 2008. Are these donors all over their \$2,300 per campaign limit?

¹ These transactions may be found by searching the All.zip file attribute "receipt_desc" for the records listing "REATRIBUTION/REDESIGNATION REQUESTED".

² These transactions may be found by searching the All.zip file attribute "memo_text" for the records listing "CREDIT CARD CHARGEBACK" and "RETURNED BY BANK".

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Then there are some debits listed as credit card chargebacks and bank returns. They do not appear to be included in the campaign report total for Refunds to Individuals. Even if these are accounting errors that could be dismissed against the redistribution/redesignation credits, they need to be corrected as they obscure the accounting and introduce errors. The \$26 million in redistribution/redesignation requests would still be no lower than the cumulative total \$25 million shown in Table II.

The American People need an audit of the Obama for America (C00431445) and Obama Victory Fund (C00451393). We are depending on the FEC to assure compliance with fair practices. Please audit the Obama Presidential Campaign Funds. Thank you for your time and consideration.

Yours Truly,



Luanne Moore

Boynton Beach, FL 33436

Phone:

Email:

Subscribed and sworn to before me this 23rd day of DEC, 2008.



Thomas A. Sheehan
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