

## REPORTS ANALYSIS DIVISION REFERRAL

TO

## ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 12, 2010

ANALYST: Nicole Miller

- I. COMMITTEE: Campaign for Change  
C00441501  
Nickolai Bobrov, Treasurer  
202 Bonham Rd.  
Dedham, MA 02026
- II. RELEVANT STATUTES: 2 U.S.C. §§ 434(b)(2)  
11 CFR §§ 104.3(a)(2)  
11 CFR §104.18(f)

## III. BACKGROUND:

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

The Campaign for Change ("the Committee") amended its 2010 April Quarterly Report to disclose additional receipts of \$120,653.26 that were not disclosed in the original 2010 April Quarterly Report (Attachment 2).

On April 16, 2010, the Committee filed its original 2010 April Quarterly Report covering the period from January 1, 2010 through March 31, 2010. The original report disclosed \$0.00 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other Than Political Committees), \$31.58 on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other Than Political Committees), \$4,500.00 on Line 11(c) (Contributions from Other Political Committees) and \$25,094.86 on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 10930618639, Attachment 2).

On July 9, 2010, the Committee filed an Amended 2010 April Quarterly Report which disclosed receipts of \$85,550.00 on Line 11(a)(i), \$325.00 on Line 11(a)(ii), \$39,300.00 on Line 11(c), and \$25,104.70 on Line 17 of the Detailed Summary Page (Image 10990836404, Attachment 2). The Committee attached a memo text to this report which stated in full:

11190291196

11190291197

"The original report was filed with incorrect receipt and disbursement data due to a data processing error. This report discloses the correct information" (Image 10990836402).

On August 13, 2010, a Request for Addition Information ("RFAI") was sent to the Committee referencing the Amended 2010 April Quarterly Report, received July 9, 2010. The RFAI requested clarification regarding the additional receipts<sup>1</sup> disclosed on Lines 11(a)(i), 11(c), and 17<sup>2</sup> of the Detailed Summary Page that were not previously disclosed on the Committee's original 2010 April Quarterly Report. The RFAI also requested clarification regarding the omission of disbursements previously disclosed on the Committee's original 2010 April Quarterly Report (Image 10030410219).

On September 15, 2010 the Committee filed two Amended April Quarterly Reports covering from January 1, 2010 through March 31, 2010. These reports disclosed no additional change in activity for the lines questioned in the RFAI, but further explained the change in activity in a memo text which stated in full:

"This committee is a leadership PAC for William D. Delahunt. When the April Quarterly was originally filed (See FEC-463568), committee personnel inadvertently included receipts and disbursement data associated with Congressman Delahunt's principal campaign committee (see FEC-462966) rather than the Campaign for Change. This discrepancy was discovered during the production of the July Quarterly Report leading to the amendment which reflected the accurate data. Committee personnel have reviewed procedures to ensure that this error does not recur" (Image 10991138276).

On September 27, 2010, the Reports Analysis Division ("RAD") Analyst attempted to call the treasurer, Nickolai Bobrov, to give the Committee an opportunity to place additional information on the public record regarding the increase in receipts on its Amended 2010 April Quarterly Report; however, the phone number provided on the Statement of Organization (Form 1) was no longer in service (Attachment 3).

On November 1, 2010, the RAD Analyst called David Martin, a consultant for the Committee. The Analyst explained to Mr. Martin that the treasurer of the Committee could not be reached because of an invalid phone number. The Analyst then explained that the Committee might be referred for further Commission action in reference to the increased receipts disclosed on the Amended 2010 April Quarterly Report. The Analyst also said that any additional clarification provided by the Committee concerning this activity would be taken into consideration.

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

<sup>1</sup> The amount referenced in the RFAI, \$150,279.70, is the total amount of receipts disclosed on the Amended 2010 April Quarterly Report, received 7/9/10. The total increase in activity on this report is \$120,653.26.

<sup>2</sup> The RFAI inadvertently omitted the reference to Line 11(a)(ii).