

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 16, 2011

ANALYST: Rebecca Hough

- I. COMMITTEE: Blakeman 2010 Inc
C00474510
Alan Kappel, Treasurer
108 South Franklin Ave., Suite 1
Valley Stream, NY 11580
- II. RELEVANT STATUTES: 2 U.S.C. § 434(b)(4)
11 CFR § 104.3(b)
- III. BACKGROUND:

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

Blakeman 2010 Inc ("the Committee") amended its 2010 12 Day Pre-Primary Report to disclose increased disbursements totaling \$153,548.31 (Attachment 2).

On September 2, 2010, the Committee filed the original 2010 12 Day Pre-Primary Report covering the period from July 1, 2010 through August 25, 2010 (Image 10020631889). The report disclosed \$57,373.43 in disbursements on Line 17 (Operating Expenditures), \$2,250.00 in disbursements on Line 20(a) (Refunds of Contributions to Individuals), and \$0.00 in disbursements on Line 21 (Other Disbursements) of the Detailed Summary Page (Image 10020631893; Attachment 2).

On October 15, 2010, the Committee filed an Amended 2010 12 Day Pre-Primary Report (Image 10020682116). The report disclosed \$206,621.59 in disbursements on Line 17, \$2,250.00 in disbursements on Line 20(a), and \$0.00 in disbursements on Line 21 of the Detailed Summary Page (Image 10020682119).

On February 4, 2011, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2010 12 Day Pre-Primary Report, received on October 15, 2010. The RFAI requested clarification regarding the substantial increase in disbursements that were not disclosed in the original filing (Image 11330004365).

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On February 23, 2011, the Committee filed another Amended 12 Day Pre-Primary Report (Image 11020082294). The report disclosed \$209,721.74 in disbursements on Line 17, \$2,450.00 in disbursements on Line 20(a), and \$1,000.00 in disbursements on Line 21 of the Detailed Summary Page (Image 11020082297; Attachment 2).

On March 12, 2011, the Committee filed a Miscellaneous Paper Document (FEC Form 99) in response to the RFAI. The FEC Form 99 stated, in part:

"The increase resulted from confusion by the bookkeeping staff over the different reporting schedule for a pre-primary report as compared to a quarterly report. Once the compliance consultants received the appropriate information from the bookkeeping staff and resolved several questions about proper reporting of the information, an amended report was filed" (Image 11020093221).

On April 12, 2011, the Reports Analysis Division ("RAD") Analyst left a message for Donna Smith, a representative of the Committee. The Analyst stated she was calling regarding an issue that would require further review by the Commission and requested for the call to be returned (Attachment 3).

On April 12, 2011, Ms. Smith returned the earlier call from the RAD Analyst. The Analyst explained that if the Committee wished to further explain the increase in activity on the Amended 2010 12 Day Pre-Primary Reports, they needed to do so by April 20, 2011. The Analyst also explained that due to the amount of the increase, this matter would need to be examined by another office at the Commission (Attachment 3).

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

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