

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 23, 2015

ANALYST: Christopher Whyrick

- I. COMMITTEE: Friends of Clyde Holloway for Congress
C00548743
Stephanie Holloway, Treasurer (9/19/2013 - Present)
Felix Guillot, Treasurer (8/29/13 - 9/18/2013)
P.O. Box 340
Forest Hill, LA 71430
- II. RELEVANT STATUTES: 11 CFR § 104.3(b)(2)
52 U.S.C. § 30104(b)(4)

III. BACKGROUND:

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

Friends of Clyde Holloway for Congress ("the Committee") amended its 2013 Year-End Report to disclose additional disbursements totaling \$174,733.96, which were not included in the original report (Attachment 2).

On January 31, 2014, the Committee filed its original 2013 Year-End Report, covering the period from November 8, 2013 through December 31, 2013. The report disclosed disbursements totaling \$25,000.00 on Line 17 (Operating Expenditures) and contribution refunds totaling \$0.00 on Line 20(a) (Refunds Of Contributions To Individuals/Persons Other Than Political Committees) of the Detailed Summary Page (Image 14960354415; Attachment 2).

On November 21, 2014, the Committee filed an Amended 2013 Year-End Report, covering the period from October 1, 2013 through December 31, 2013. The report disclosed \$182,133.96 in disbursements on Line 17 and \$17,600.00 in contribution refunds on Line 20(a) of the Detailed Summary Page, a total increase in disbursements of \$174,733.96 from the original report (Image 14952599192; Attachment 2).

On October 15, 2014, the Reports Analysis Division (RAD) Analyst received a call from Felix Guillot, the Committee's reports preparer. Mr. Guillot explained that he had filed the 2014 April and July Quarterly Reports and noted the beginning cash issues from the 2013 Year-End Report. He said that he was not sure how to handle this problem. The RAD Analyst brought to Mr. Guillot's attention discrepancies in the Committee's reporting of loans on the 2013 October Quarterly, 2013 Year-End, and 2014 April Quarterly Reports. The Analyst requested that Mr. Guillot correct these discrepancies. Mr. Guillot said he would look into these issues and file the appropriate amendments. He stated that he would contact the Analyst in the following week after he has the opportunity to review the Committee's finances and would offer an update to the discrepancies and request advice on how to rectify these issues (Attachment 3).

On February 3, 2015, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2013 Year-End Report, received November 21, 2014. The RFAI requested clarification regarding the significant increase in disbursements not disclosed on the original filing (Image 15330073448).

On March 12, 2015, the RAD Analyst contacted Mr. Guillot. The Analyst requested the Committee respond to the RFAI referencing the increase in activity disclosed on the Amended 2013 Year-End Report, filed on November 21, 2014. Mr. Guillot stated that he was not aware of the RFAI. The Analyst indicated the RFAI was sent to the Treasurer of record, Stephanie Holloway. Mr. Guillot responded that the Committee changed treasurers. The Analyst explained that the Committee must file a Form 1 amendment for the public record to reflect the treasurer change. The Analyst recommended that the Committee file an explanatory statement concerning the omission of activity that was included on the Amended 2013 Year-End Report from the original report and indicated that this issue may be referred to another Commission office for further review (Attachment 3).

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

O-Index(2015-2016)															
Cmte. ID: C00548743		Cmte. Name: FRIENDS OF CLYDE HOLLOWAY FOR CONGRESS													
Treasurer Name: STEPHANIE HOLLOWAY		Address: PO BOX 340, FOREST HILL, LA 71430													
Cmte. Type: H (HOUSE)		Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)										Filing Frequency: QUARTERLY FILER			
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Imp#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
No records were found for this cycle.															

O-Index (2013-2014)															
Cmte. ID: C00548743		Cmte. Name: FRIENDS OF CLYDE HOLLOWAY FOR CONGRESS													
Treasurer Name: STEPHANIE HOLLOWAY		Address: PO BOX 340, FOREST HILL, LA 71430													
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RO2	YE	A	2/3/2015	3	15330073448	10/1/2013	12/31/2013	2/3/2015							
RO2	YE	N	3/19/2014	2	14330047887	1/1/2013	12/31/2013	3/19/2014							
RO2	Q1		5/2/2014	2	14330051318	1/1/2014	3/31/2014	5/2/2014							
RO2	Q1	A	2/3/2015	2	15330073451	1/1/2014	3/31/2014	2/3/2015							
RO2	Q2	A	2/3/2015	4	15330073453	4/1/2014	6/30/2014	2/3/2015							
RO2	Q3	A	2/5/2015	3	15330073769	7/1/2014	9/30/2014	2/5/2015							
RO2	12G	A	2/5/2015	2	15330073772	10/1/2014	10/16/2014	2/5/2015							
RO2	30G	A	2/5/2015	3	15330073774	10/16/2014	11/24/2014	2/5/2015							
F3N	Q3	N	10/7/2013	53	13864635097	7/1/2013	9/30/2013		\$0	\$245,597	\$100,261	\$145,335		\$111,779	\$111,779
F3A	Q3	A	1/21/2014	54	14952598884	7/1/2013	9/30/2013		\$0	\$245,597	\$100,224	\$145,373		\$111,742	\$111,742
F3N	YE	N	1/31/2014	11	14960354412	11/8/2013	12/31/2013		\$7,250	\$38,000	\$25,000	\$5,750		\$35,000	\$35,000
F3A	YE	A	1/21/2014	34	14952598789	10/1/2013	12/31/2013		\$145,335	\$58,445	\$199,733	\$4,047		\$181,742	\$181,742
F3N	Q1	N	7/15/2014	9	14941828479	1/1/2014	3/31/2014		\$176,743	\$0	\$0	\$176,743		\$185,150	\$185,150
F3A	Q1	A	11/21/2014	8	14952599223	1/1/2014	3/31/2014		\$4,047	\$0	\$0	\$4,047		\$148,742	\$148,742
F3N	Q2	N	7/15/2014	21	14941829534	4/1/2014	6/30/2014		\$176,743	\$24,881	\$855	\$200,869		\$185,150	\$185,150
F3A	Q2	A	11/21/2014	21	14952599233	4/1/2014	6/30/2014		\$4,047	\$24,881	\$855	\$28,773		\$148,742	\$148,742
F3N	Q3	N	10/15/2014	21	14978241404	7/1/2014	9/30/2014		\$200,969	\$71,692	\$48,742	\$225,919		\$215,150	\$215,150
F3A	Q3	A	11/21/2014	21	14952599269	7/1/2014	9/30/2014		\$28,273	\$7,692	\$48,742	\$53,223		\$185,742	\$185,742
F3N	12G	N	10/18/2014	14	14951877803	10/1/2014	10/15/2014		\$225,919	\$7,050	\$391	\$232,578		\$215,150	\$215,150
F3A	12G	A	11/21/2014	14	14952599290	10/1/2014	10/15/2014		\$53,223	\$7,050	\$11,391	\$68,882		\$185,742	\$185,742
F3N	30G	N	11/21/2014	14	14952599328	10/16/2014	11/24/2014		\$48,882	\$12,725	\$0	\$81,607		\$185,742	\$185,742
F3A	30G	A	1/29/2015	18	15950153576	10/16/2014	11/24/2014		\$49,067	\$12,725	\$30,589	\$31,213		\$185,742	\$185,742
F3N	YE	N	1/29/2015	15	15970138525	11/25/2014	12/31/2014		\$31,213	\$7,380	\$37,099	\$1,483		\$185,742	\$185,742
F2		A	8/29/2013	4	13031112472										
F1		A	8/29/2013	6	13031112465										
F2N		N	10/31/2013	1	14952598488										
E2		N	8/28/2013	3	13031113518										
E2		A	8/29/2013	2	13031112462										
F1		N	8/20/2013	10	13031113507										
E1		A	8/20/2013	2	13031112454										
E1		A	8/19/2013	6	13031114775										
TDN1			10/15/2013	1	13864780137										
Totals										\$427,734	\$426,415				

O-Index (2011-2012)															
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Form Tr	Rpt Tr	Alt	Recpt Dt	Pgs	Begin Inq#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debts	Loans	Debts & Loans

No records were found for this cycle.

Friends of Clyde Holloway for Congress (C00548743)

2013 Year-End Report/Amended 2013 Year-End Report, received 11/21/2014

Overview of Additional Disbursements

Report Line	2013 Year- End Report (Image 14960354415)	Amended 2013 Year- End Report, received 11/21/14 (Image 14952599192)	Disbursement Variance Amount
Line 17: Operating Expenditures.	\$25,000.00	\$182,133.96	\$157,133.96
Line 20(a): Refunds Of Contributions To Individuals/Persons Other Than Political Committees	\$0.00	\$17,600.00	\$17,600.00
Total Variance:			\$174,733.96