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October 27, 2011

Jeff Jordan

Supervisory Attorney

Complaints Examination & Legal Administration

Federal Election Commission

999 E Street, NW

Washington DC 20463

Re: MUR 6497

Dear Mr. Jordan:

This constitutes the response of McCaskill for Missouri 2012 (the "2012 Committee"); Darold E. Crotzer, in his official capacity as Treasurer to McCaskill for Missouri 2012; McCaskill for Missouri (the "2006 Committee"); and Sandra Querry, in her official capacity as Treasurer to McCaskill for Missouri ("Respondents"), to the Complaint filed by the Missouri Republican State Committee ("Complainant") on August 23, 2011.

The Complaint – which, in Complainant's own words, is based on a " cursory review of Senator's McCaskill's filings" and " cursory analysis" – should be dismissed.¹

I. The Complaint Does Not Allege Facts Showing that 2012 Committee Violated Act

The Complaint does not "allege specific facts, which, if proven true, would constitute a violation of the" Federal Election Campaign Act (the "Act") by the 2012 Committee.² As a result, the Complaint against the 2012 Committee should be dismissed.³

¹ Complaint, at 2-3.

² Statement of Reasons of Commissioners David M. Mason, Bradley A. Smith, Karl J. Sandstrom, and Scott E. Thomas, Matter Under Review 4960 (Clinton for U.S. Senate Exploratory Committee) (Dec. 21, 2000) (finding that Commission may find reason to believe only where complaint meets this threshold standard).

³ See Statement of Reasons of Vice Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Donald F. McGhan, Matter Under Review 6056 (Protect Colorado Jobs) (June 1, 2009), n. 12 ("Therefore, facts

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2011 OCT 28 AM 10: 52
OFFICE OF GENERAL
COUNSEL

The Complaint alleges:⁴

According to various press reports (Exhibit B), Senator McCaskill used taxpayer dollars to fund her travel on a private jet to political events. These events reportedly took place on March 3, 2007 (in Hannibal, MO) and May 19, 2007 (in Kansas City, MO). Once caught, Senator McCaskill admitted to misusing taxpayer funds and wrote a personal check to cover the cost of those flights.

The Complaint ~~then concludes that~~ the 2012 Committee should have reported these payments as in-kind contributions and, by failing to do so, violated the Act.

But the Complaint's factual allegations do not support its legal conclusion. A payment for noncommercial travel is an in-kind contribution to an authorized campaign committee only when the noncommercial travel is taken "on behalf of" that campaign committee.⁵ The Complaint, however, does not allege that the two trips were taken "on behalf of" the 2012 Committee. And Exhibit B, the only factual evidence that Complainant presents in support of the allegation, describes the March 3 Hannibal event as the "local Democratic Party's annual Hannibal Days" and the May 19 Kansas City event as "a Democratic event[]." ⁶

Because it fails to allege specific facts, which, if proven true, would constitute a violation of the Act, the Complaint against the 2012 Committee should be dismissed.

II. The Level of Additional Activity Reported by the 2006 Committee Does Not Justify Further Commission Action

On July 15, 2011, in anticipation of termination, the 2006 Committee filed several amendments to its 2006 report.⁷ The 2006 Committee filed these amendments on its own volition, not in

presented in the complaint that are not rebutted must be sufficient to sustain a violation of the law. Only if this threshold is met will there be a reason to investigate. The RTB standard does not permit a complainant to present mere allegations that the Act has been violated and request that the Commission undertake an investigation to determine whether there are facts to support the charges.").

⁴ Complaint, at 2.

⁵ See 11 C.F.R. § 100.93(c)(1).

⁶ Complaint, at Exhibit B.

⁷ It is common for committees on the verge of termination to amend earlier reports, as they close out their accounts. It is even more understandable in the case of the 2006 Committee, because its lead compliance staffer was killed in a July 2006 plane crash and was replaced by junior level staffers. See Letter from McCaskill for Missouri to Jill Sugarman, Reports Analyst Division (July 29, 2011), available at <http://www.fec.gov>. To minimize the likelihood

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response to a complaint or an RFAI. The amendments were filed in the midst of Senator McCaskill's ostended re-election campaign, providing full disclosure to the electorate more than one year before voters go to the polls. Complainant alleges that one of these amendments, the 2006 post-general report, reveals "massive and ongoing" reporting violations and provides a basis for the Commission to "open an investigation into Senator McCaskill's campaign activities; conduct a full audit of her campaign committee; impose the necessary civil fines and penalties; and take whatever other action the Commission deems appropriate."⁸

This is pure hyperbole. The amendments did not create an "ongoing" problem; they *corrected* the reporting errors that were made during the 2006 election cycle. Nor were the reporting errors in the original post-general report "massive" in nature. The initial post-general report, filed in late 2006, underreported receipts by 9.7 percent and disbursements by 9.9 percent.⁹ The only legal source that Complainant cites in support of its demand for action against the 2006 Committee is a list of referrals that the Reports Analysis Division ("RAD") made to the Office of General Counsel. But, as Table 1 shows (see Appendix), the level of underreported activity by the referred committees dwarfs the level of underreported activity by the 2006 Committee. Each of the referred committees had unreported receipts or disbursements that were *more than 15 percent* of the reported receipts or disbursements (with all but one over 20 percent and some in excess of 100 percent). In contrast, the level of underreporting in the 2006 post-general report was *less than 10 percent*.¹⁰

In other instances in which reporting errors were *de minimis* (e.g. less than 10 percent) and the committees amended their reports to correct the errors, the Commission dismissed complaints urging further action.¹¹ It should do the same here, and dismiss the complaint against the 2006 Committee.

of future problems, the 2012 Committee hired a new compliance firm with significant experience in Federal campaigns.

⁸ Complaint, at 4.

⁹ See Exhibit A. The original post-general report included \$2,647,530.77 in total disbursements (Line 22) and \$3,050,145.88 (Line 16) in total receipts. The amended post-general report included \$3,351,648.28 in total disbursements (Line 22) and \$2,903,472.23 in total receipts (Line 16).

¹⁰ Complainant alleges that the level of misreporting was more than 20 percent. Complainant arrives at this figure erroneously, however. The RAD has calculated misreporting levels by looking at "total receipts" and "total disbursements," not by examining one particular type of receipt or disbursement.

¹¹ See, e.g. Matter Under Review 5989 (Shafroth for Congress) (Aug. 6, 2008) (dismissing complaint where committee failed to itemize 7 percent of its contributions during election cycle).

October 27, 2011
Page 4

Very truly yours,

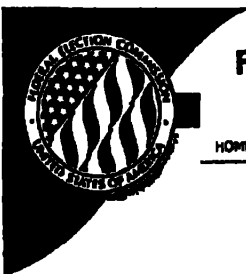
Marc E. Elias, J.D.

Marc E. Elias
Counsel to Respondents

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13044330070

Exhibit A



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Page by Page Report Display (Page 1 of 1486)

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FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized CommitteeSECRETARY OF THE SENATE
06 DEC -7 PM 3:45

HD

| | | | | | | | |
|--|--|---|--|--|--|--|--|
| 1. NAME OF COMMITTEE (in full) | | USE PRE-PRINTED LABEL OR TYPE OR PRINT | | Committee Label, Use Not To Date | | Other Use Only | |
| McConnell for Missouri | | | | | | | |
| ADDRESS (number and street) | | Post Office Box (ZIP) | | | | | |
| <input type="checkbox"/> Check if address has previously reported (P-CR) | | <input type="checkbox"/> (a) Legal | | <input type="checkbox"/> MD | | <input type="checkbox"/> 2544 | |
| 2. FIVE DIGIT FIVE-DIGIT CODE | | CITY | | STATE | | ZIP CODE | |
| 00041001 | | | | | | 1001 1001 | |
| 3. IS THIS REPORT | | <input type="checkbox"/> NEW | | <input type="checkbox"/> ON | | <input type="checkbox"/> AMENDED | |
| 4. TYPE OF REPORT (Choose One) | | 12-Day PRE-Election Report for this | | General (100) | | Special (100) | |
| <input type="checkbox"/> Quarterly Report: | | <input type="checkbox"/> Primary (100) | | <input type="checkbox"/> General (100) | | <input type="checkbox"/> Recall (100) | |
| <input type="checkbox"/> April 15 Quarterly Report (20) | | <input type="checkbox"/> Convention (100) | | <input type="checkbox"/> Special (100) | | | |
| <input type="checkbox"/> July 15 Quarterly Report (20) | | Election on | | In the State of | | | |
| <input type="checkbox"/> October 15 Quarterly Report (20) | | <input type="checkbox"/> General (100) | | <input type="checkbox"/> Recall (100) | | <input type="checkbox"/> Special (100) | |
| <input type="checkbox"/> January 15 Year-End Report (10) | | Election on | | In the State of | | | |
| <input type="checkbox"/> Termination Report (100) | | <input type="checkbox"/> General (100) | | <input type="checkbox"/> Recall (100) | | <input type="checkbox"/> Special (100) | |
| | | Election on | | In the State of | | | |
| 5. Covering Period | | 10 10 2000 | | through | | 11 27 2000 | |
| I certify that I have submitted this Report and to the best of my knowledge and belief it is true, correct and complete. | | | | | | | |
| Type or Print Name of Treasurer Ted Morris | | | | | | | |
| Signature of Treasurer <i>Ted Morris</i> Date 12 07 2000 | | | | | | | |
| NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 USC 435g. | | | | | | | |
| Other Use Only | | | | | | | |

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Image: 1.000000

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 9 (Revised 03/2003) Page 2

Write or Type Candidate Name
McCain for President

Report Covering the Period: From 10/1/2008 To 11/30/2008

| | COLUMN A This Period | COLUMN B Election Cycle-to-Date |
|--|-------------------------|------------------------------------|
| 6. Net Contributions (after PFC bond) | | |
| (a) Total Contributions (after PFC bond) (page Line 11 net) | 303905.77 | 1973151.30 |
| (b) Total Contribution Refunds (page Line 12 net) | 3523.44 | 61882.00 |
| (c) Net Contributions (after PFC bond) (subtract line 12 from line 11 net) | 300382.33 | 1911269.30 |
| 7. Net Operating Expenditures | | |
| (a) Total Operating Expenditures (page Line 17) | 2547283.18 | 10857770.98 |
| (b) Total Offsets to Operating Expenditures (page Line 18) | 0.00 | 39385.90 |
| (c) Net Operating Expenditures (subtract line 18 from line 17 net) | 2547283.18 | 10897156.88 |
| 8. Cash on Hand at Close of Reporting Period (page Line 19) | 243985.43 | |
| 9. Gifts and Contributions Over 10% the Candidate (page 11 or Schedule C or Schedule D) | 0.00 | |
| 10. Gifts and Contributions Over 10% the Candidate (page 11 or Schedule C or Schedule D) | 284500.00 | |

For further information contact:
Federal Election Commission
600 E Street, NW
Washington, DC 20463
Toll Free 800-424-6530
Local 202-694-1100

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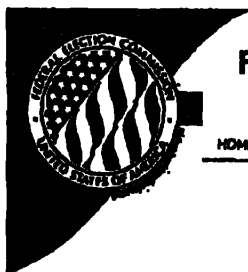
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Image: 26021032156 POST-ELECTION DETAILED SUMMARY PAGE 3/1486
 FEC Form 3 (Revised 09/2008) Report of Receipts and Disbursements Page 3

If the candidate participated in the general election, use this form for the 50-day Post-General report.
 If the candidate did not participate in the general election, use this form for the Year-end report covering through December 31 of the election year (plus the January 31).

This form is used in lieu of filing and Line Numbers 8 through 9 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the first report filed by a candidate during the election cycle.

Write or Type Candidate Name
 McCain/M for McCain

Report Covering the Period: From 10 18 2008 To 11 27 2008

I. RECEIPTS

| COLUMN A Total (by Period) | COLUMN B (Election Cycle Total as of) | COLUMN C Total for |
|--|--|--|
| 11. CONTRIBUTIONS (other than loans) FROM: (a) Individuals/Parties Other than Political Committees (b) Nonprofit (See Schedule A) 147762.30 | 10 07 2008 (date of general election) | 10 08 2008 (date after general election) through 11 27 2008 (last day of reporting period) |
| (c) Unidentified 100000.00 | | |
| (d) Total of contributions from individuals 2513683.00 | 2594187.30 | 26934.10 |
| (e) Political Party Committees 2241.00 | 2701.00 | 0.00 |
| (f) Other Political Committees 110000.00 | 90000.00 | 1700.00 |

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| POST-ELECTION DETAILED SUMMARY PAGE Report of Receipts and Disbursements | | |
|---|---|--|
| COLUMN A Total No. Period | COLUMN B Election Cycle Total (start - end of general election) (* See page 8 for date) | COLUMN C Total No. * (date after general election) through * (last day of reporting period) (* See page 8 for date) |
| 10. The Candidate | | |
| 0.00 | 0.00 | 0.00 |
| 11. TOTAL CONTRIBUTIONS (after short loans) (add Lines 11(a)(i), (ii), (d) and (e)) | | |
| 2823925.77 | 10781215.23 | 82584.19 |
| 12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES | | |
| 18825.00 | 419375.32 | 18825.00 |
| 13. LOANS: | | |
| (a) Made or Short-Term for Candidate | | |
| 0.00 | 484235.00 | 0.00 |
| (b) All Other Loans | | |
| 0.00 | 0.00 | 0.00 |
| 13. TOTAL LOANS (add Lines 13(a) and (b)) | | |
| 0.00 | 484235.00 | 0.00 |
| 14. OFFSETS TO OPERATING EXPENDITURES (salaries, salaries, etc) | | |
| 0.00 | 82385.30 | 0.00 |
| 15. OTHER RECEIPTS (Gifts, interest, etc) | | |
| 0.00 | 34977.28 | 0.00 |
| 16. TOTAL RECEIPTS (add Lines 11(a), 12, 13(a), 14 and 15) | | |
| 2847590.77 | 11718299.73 | 71289.19 |

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Report 448808 POST ELECTION DETAILED SUMMARY PAGE 5/1486
 Form 1 (Required) Report of Receipts and Disbursements Page 7
 Name of Candidate or Officeholder
 Name of Party or Committee
 Reporting period From 10/1/2008 To 10/31/2008

| DISBURSEMENTS | DISBURSEMENTS | DISBURSEMENTS | |
|--|---------------|---------------|-----------|
| DISBURSEMENTS | DISBURSEMENTS | DISBURSEMENTS | |
| DISBURSEMENTS | DISBURSEMENTS | DISBURSEMENTS | |
| 11. OFFICIAL CAMPAIGN USE | 254722.15 | 1002770.54 | 305092.69 |
| 12. TRANSFER TO OTHER AUTHORIZED COMMITTEES | 0.00 | 0.00 | 0.00 |
| 13. LEASE PAYMENTS | 40428.00 | 40428.00 | 0.00 |
| 14. OTHER LEASES | 0.00 | 0.00 | 0.00 |
| 15. TOTAL LEASE PAYMENTS (add lines 13 and 14) | 40428.00 | 40428.00 | 0.00 |
| 16. REPAYMENTS OF OTHER RECEIPTS TO: | | | |
| (a) Individuals/Parties Other Than Political Committee | 0.00 | 0.00 | 0.00 |
| (b) Political Party Committee | 0.00 | 0.00 | 0.00 |

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| PAGE 3 Detailed DISBURSEMENTS | | POST ELECTION DETAILED SUMMARY PAGE | | ST1000 |
|--|---|---|---|--------|
| Report of Receipts and Disbursements | | Page 3 | | Page 6 |
| COLUMN A Total line periods | COLUMN B Maximum Credit Transfers or * (Less of General Disbursements) (* See page 3 for date) | COLUMN C Total Tax * (Less of General Disbursements) (* See page 3 for date) | COLUMN D Total Tax * (Less of General Disbursements) (* See page 3 for date) | |
| (a) Other political committee (such as PACs) | | | | |
| 0.00 | 0000.00 | 0.00 | 0.00 | |
| (b) TOTAL CONTRIBUTION REPORTS (see lines 0004, 01, and 02) | | | | |
| 0000.00 | 01000.00 | 0000.00 | 0000.00 | |
| (c) OTHER DISBURSEMENTS | | | | |
| 0.00 | 0.00 | 0.00 | 0.00 | |
| (d) TOTAL DISBURSEMENTS (sum of lines 12, 15, 1604, 0004, and 01) | | | | |
| 000000.00 | 1110000.00 | 000000.00 | 000000.00 | |
| (e) NET CONTRIBUTIONS (OTHER THAN LOANS) | | | | |
| (Enter Disbursements in line 15 of Summary Page for Disbursements only; subtract line 0004 from line 1100) | | | | |
| 000000.00 | 000000.00 | 000000.00 | 000000.00 | |
| (f) NET OPERATING EXPENSES | | | | |
| (Enter Disbursements in line 15 of Summary Page for Disbursements only; subtract line 1100 from line 1100) | | | | |
| 000000.00 | 000000.00 | 000000.00 | 000000.00 | |
| (g) CASH ON HAND | | | | |
| (h) CASH ON HAND AT BEGINNING OF REPORTING PERIOD | | 000000.00 | | |
| (i) TOTAL RECEIPTS AT END OF REPORTING PERIOD | | 000000.00 | | |
| (j) SUBTOTAL (sum of lines 01 and line 02) | | 000000.00 | | |
| (k) TOTAL DISBURSEMENTS AT END OF REPORTING PERIOD (sum of lines 12, 15, 1604, 0004, and 01) | | 000000.00 | | |
| (l) CASH ON HAND AT END OF REPORTING PERIOD (sum of lines 01 and line 02) | | 000000.00 | | |

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**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

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SECRETARY OF THE SENATE
PUBLIC RECORDS

11 JUL 15 PM 5:31

Office Use Only

1. NAME OF
COMMITTEE (In full)

USE FEC MAILING LABEL
OR TYPE OR PRINT

Example: If typing, type
over the lines

McCaskill for Missouri

ADDRESS (number and street)

700 13th Street, NW



Check if different
than previously
reported. (ACC)

Suite 600

Washington

DC

20005

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

STATE DISTRICT

C00414961

3. IS THIS
REPORT



NEW
(N)

OR



AMENDED
(A)

MO

06

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)



Termination Report (TER)

(b) 12-Day PRE-Election Report for the:



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

10

07

2006

In the
State of

MO

(c) 30-Day POST-Election Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on

11

07

2006

In the
State of

MO

5. Covering Period

10

19

2006

through

11

27

2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

David Kirby-Asst Treas.

Signature of Treasurer

Electronically Filed by David Kirby-Asst Treas.

Date

07

14

2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office
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FEC FORM 3
(Revised 02/2003)

FESAN010

13044330077

11020270001

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

2 / 1512

Write or Type Committee Name

McCaskill for Missouri 2012

Report Covering the Period:

From:

MM DD YYYY
10 19 2006

To:

MM DD YYYY
11 27 2006

| | COLUMN A This Period | COLUMN B Election Cycle-to-Date |
|--|-------------------------|------------------------------------|
| 6. Net Contributions (other than loans) | | |
| (a) Total Contributions (other than loans) (from Line 11(e))..... | 2885100.66 | 10981362.28 |
| (b) Total Contribution Refunds (from Line 20(a))..... | 4367.44 | 47887.08 |
| (c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))..... | 2880733.22 | 10933475.20 |
| 7. Net Operating Expenditures | | |
| (a) Total Operating Expenditures (from Line 17)..... | 2853041.34 | 10808915.38 |
| (b) Total Offsets to Operating Expenditures (from Line 14)..... | 0.00 | 32385.28 |
| (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))..... | 2853041.34 | 10877530.10 |
| 8. Cash on Hand at Close of Reporting Period (from Line 27)..... | 219778.73 | |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)..... | 0.00 | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)..... | 394343.24 | |

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

FESAN018

13044330078

11020270002

POST-ELECTION DETAILED SUMMARY PAGE

FEC Form 3 (Revised 07/05)

Report of Receipts and Disbursements

3 / 1512

. If the candidate participated in the general election, use this form for the 30-day Post-General report.

. If the candidate did NOT participate in the general election, use this form for the Year-end report covering through December 31 of the election year (due on January 31).

This form is used in lieu of filling out Line Numbers 6 through 7 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the last report filed by a candidate during the current election cycle.

Write or Type Committee Name

McCaskill for Missouri 2012

Report Covering the Period:

From:

MM
10

DD
19

YYYYYY
2008

To:

MM
11

DD
27

YYYYYY
2008

I. RECEIPTS

| COLUMN A Total this Period | COLUMN B Election Cycle Total as of MM DD YYYY (date of general election) | COLUMN C Total for MM DD YYYY (date after general election) through MM DD YYYY (last day of reporting period) |
|--|--|---|
| 11. CONTRIBUTIONS (other than loans) FROM: (a) Individuals/Persons Other than Political Committees (i) Itemized (Use Schedule A) | MM DD YYYY 11 07 2008 | MM DD YYYY 11 08 2008 |
| 1487575.39 | 7215353.28 | 20800.00 |
| (ii) Unitemized | | |
| 1281222.30 | 2749578.73 | 14147.00 |
| (iii) Total of contributions from individuals | | |
| 2768797.69 | 9964932.01 | 34947.00 |
| (b) Political Party Committees | | |
| 3341.50 | 64631.50 | 0.00 |
| (c) Other Political Committees | | |
| 112961.47 | 981798.77 | 12000.00 |

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POST-ELECTION DETAILED
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Report of Receipts and Disbursements

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| COLUMN A Total this Period | COLUMN B Election Cycle Total as of * (date of general Election) (* See page 5 for date) | COLUMN C Total for * (date after general election) Through * (last day of reporting period) (* See page 5 for dates) |
|---|---|---|
| (d) The Candidate | | |
| 0.00 | 0.00 | 0.00 |
| (e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c) and (d)) | | |
| 2885100.66 | 10981362.28 | 46947.00 |
| 12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES | | |
| 18044.71 | 435375.32 | 2044.71 |
| 13. LOANS: | | |
| (a) Made or Guaranteed by the Candidate | | |
| 0.00 | 494239.50 | 0.00 |
| (b). All Other Loans | | |
| 0.00 | 0.00 | 0.00 |
| (c). TOTAL LOANS (add Lines 13(a) and (b)) | | |
| 0.00 | 494239.50 | 0.00 |
| 14. OFFSETS TO OPERATING EXPENDITURES (refunds, rebates, etc) | | |
| 0.00 | 32385.28 | 0.00 |
| 15. OTHER RECEIPTS (Dividends, Interest, etc) | | |
| 326.86 | 48864.75 | 0.00 |
| 16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15) | | |
| 2903472.23 | 11992227.13 | 48991.71 |

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Report of Receipts and Disbursements

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Write or Type Committee Name

McCaskill for Missouri 2012

Report the covering period

From:

10

19

2006

To:

11

27

2006

II. DISBURSEMENTS

| COLUMN A Total this period | COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date) | COLUMN C Total for * Through * (date after general election) (last day of reporting period) (* See page 5 for date) |
|--|---|--|
| 17. OPERATING EXPENDITURES | | |
| 2853041.34 | 10909915.38 | 366709.79 |
| 18. TRANSFER TO OTHER AUTHORIZED COMMITTEES | | |
| 0.00 | 0.00 | 0.00 |
| 19. LOAN PAYMENTS | | |
| (a) Of Loans Made or Guaranteed by the Candidate | | |
| 494239.50 | 494239.50 | 0.00 |
| (b) Of All Other Loans | | |
| 0.00 | 0.00 | 0.00 |
| (c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and 19(b)) | | |
| 494239.50 | 494239.50 | 0.00 |
| 20. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| 4367.44 | 40487.08 | 2688.36 |
| (b) Political Party Committees | | |
| 0.00 | 800.00 | 0.00 |

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Report of Receipts and Disbursements

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| COLUMN A Total this period | COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date) | COLUMN C Total for * Through * (date after general election) (last day of reporting period) (* See page 5 for date) |
|--|---|--|
| (c) Other political committees (such as PACs) | | |
| 0.00 | 6600.00 | 0.00 |
| (d) TOTAL CONTRIBUTION REFUNDS (See Lines 20(a), (b) and (c)) | | |
| 4367.44 | 47887.08 | 2688.36 |
| 21. OTHER DISBURSEMENTS | | |
| 0.00 | 0.00 | 0.00 |
| 22. TOTAL DISBURSEMENTS (add lines 17, 18, 19(c), 20(d), and 21) | | |
| 3351648.28 | 11452041.96 | 369398.15 |

III. NET CONTRIBUTIONS (OTHER THAN LOANS)

(Note: Substitute in lieu of Line #6 of Summary Page for this report only; subtract line 20(d) from Line 11(e))

| | | |
|------------|-------------|----------|
| 2880733.22 | 10933475.20 | 44258.64 |
|------------|-------------|----------|

IV. NET OPERATING EXPENDITURES

(Note: Substitute in lieu of Line #7 of Summary Page for this report only; subtract line 14 from Line 17)

| | | |
|------------|-------------|-----------|
| 2853041.34 | 10877530.10 | 366709.79 |
|------------|-------------|-----------|

V. CASH SUMMARY

| | |
|--|------------|
| 23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD | 667954.78 |
| 24. TOTAL RECEIPTS AT THIS PERIOD (from Line 16)..... | 2903472.23 |
| 25. SUBTOTAL (add Line 23 and Line 24) | 3571427.01 |
| 26. TOTAL DISBURSEMENTS AT THIS PERIOD (from Line 22)..... | 3351648.28 |
| 27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (Subtract Line 26 from Line 25)..... | 219778.73 |

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