

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 14, 2015

ANALYST: Robin Kelly

- I. COMMITTEE: Gallego for Arizona
C00558627
Rebecca Wininger, Treasurer
PO Box 1710
Phoenix, AZ 85001
- II. RELEVANT STATUTES: 52 U.S.C. § 30104(b)(4)
11 CFR § 104.3(b)(2)
- III. BACKGROUND:

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

Gallego for Arizona ("the Committee") amended its 2014 12 Day Pre-General Report to disclose additional disbursements of \$53,314.07, which were not disclosed on the original report (Attachment 2).

On October 23, 2014, the Committee filed its original 2014 12 Day Pre-General Report, covering the period from October 1, 2014 through October 15, 2014. The report disclosed disbursements totaling \$22,473.42 on Line 17 (Operating Expenditures) and \$6,000.00 on Line 21 (Other Disbursements) of the Detailed Summary Page (Image 14952419244; Attachment 2).

On December 4, 2014, the Committee filed an Amended 2014 12 Day Pre-General Report, disclosing disbursements of \$23,787.49 on Line 17 and \$59,000.00 on Line 21 of the Detailed Summary Page (Image 14952772126).

On January 6, 2015, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2014 12 Day Pre-General Report, received December 4, 2014. The RFAI requested that the Committee clarify the significant

increase in disbursements disclosed on the Amended 2014 12 Day Pre-General Report received December 14, 2014 (Image 15330071488).

On January 31, 2015, the Committee filed an Amended 2014 12 Day Pre-General Report, disclosing \$58,000.00 in disbursements on Line 21 of the Detailed Summary Page. The report disclosed no change in disbursements on Line 17 of the Detailed Summary Page from the previous amendment (Image 15970243561).

On February 10, 2015, the Committee filed an Amended 2014 12 Day Pre-General Report, disclosing \$20,787.49 on Line 17 and \$61,000.00 on Line 21 of the Detailed Summary Page, a total increase in disbursements of \$53,314.07 from the original report (Image 15970263325; Attachment 2). The report included a memo text that stated, in full:

"Report is amended in response to Request for Additional Information dated 1/6/2015. Committee acknowledges increase in disbursements from original filing to first amendment, which was due to an administrative error. Committee has taken steps to more effectively review and reconcile FEC reports prior to submission in the future. This amendment fixes an error reported on the amendments with the debt owed to Lisa Fernandez, and also provides clarification on the purpose for several of the disbursements. The amendment also corrects the line number for some disbursements" (Image 15970263326).

On February 23, 2015, the Reports Analysis Division (RAD) Analyst called and left a message for Rebecca Winger, the Committee's Treasurer, requesting she return the call to discuss the increase in disbursements disclosed on the Amended 2014 12 Day Pre-General Report, received on February 10, 2015 (Attachment 3).

On February 24, 2015, Janica Kyriacopoulos, the Committee's Assistant Treasurer, called the RAD Analyst. The Analyst explained that the Committee would be referred to another office at the Commission for further action due to the increase in disbursements disclosed on the Amended 2014 12 Day Pre-General Report, received on February 10, 2015. The Analyst explained that if the Committee wished to add any further explanation to the public record, they could do so. Ms. Kyriacopoulos expressed that she had explained it as best she could in the memo text filed within the Amended 2014 12 Day Pre-General Report, received February 10, 2015. She did not have anything more to add, but noted that the omission was mainly contributions to other candidates, in which the staff was not experienced. Ms. Kyriacopoulos stated that the disbursements were overlooked and that the staff would be more careful in the future. She said they had amended the report as soon as the omission was noticed (Attachment 3).

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

| O-Index (2015-2016) | | | | | | | | | | | | | | | | |
|--|--------|----|-----------|-----|-------------|--------------|------------|-------------|------------|----------|------|----------|--------|-------|----------------|--|
| Cmte. ID: C00558627 Cmte. Name: GALLEGOS FOR ARIZONA | | | | | | | | | | | | | | | | |
| Treasurer Name: WININGER, REBECCA Address: PO BOX 1710, PHOENIX, AZ 85001 | | | | | | | | | | | | | | | | |
| Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER | | | | | | | | | | | | | | | | |
| Form Tp | Rpt Tp | AI | Recpt Dt | Pgs | Begin Img# | Begin Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Receipts | Disb | End Cash | Debits | Loans | Debits & Loans | |
| F2N | N | | 2/10/2015 | 1 | 15950604935 | | | | | | | | | | | |
| F1A | A | | 2/12/2015 | 4 | 15970264737 | | | | | | | | | | | |
| Totals | | | | | | | | | | | 30 | | | 30 | | |

| O-Index (2013-2014) | | | | | | | | | | | | | | | |
|--|--------|----|------------|-----|-------------|--------------|------------|-------------|------------|-----------|-----------|-----------|------------|-------|----------------|
| Cmte. ID: C00558627 Cmte. Name: GALLEGOS FOR ARIZONA | | | | | | | | | | | | | | | |
| Treasurer Name: WININGER, REBECCA Address: PO BOX 1710, PHOENIX, AZ 85001 | | | | | | | | | | | | | | | |
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| Form Tp | Rpt Tp | AI | Recpt Dt | Pgs | Begin Img# | Begin Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Receipts | Disb | End Cash | Debits | Loans | Debits & Loans |
| RQ2 | Q3 | N | 10/19/2014 | 3 | 14330062683 | 8/7/2014 | 9/30/2014 | 10/19/2014 | | | | | | | |
| RQ2 | 12G | A | 1/6/2015 | 2 | 15330071488 | 10/1/2014 | 10/15/2014 | 1/6/2015 | | | | | | | |
| RQ2 | 30G | N | 1/6/2015 | 2 | 15330071499 | 10/16/2014 | 1/24/2014 | 1/6/2015 | | | | | | | |
| F3N | Q1 | N | 4/15/2014 | 103 | 14950791662 | 1/1/2014 | 3/31/2014 | | \$0 | \$161,935 | \$6,386 | \$155,548 | | | \$0 |
| F3N | Q2 | N | 7/16/2014 | 163 | 14941844511 | 4/1/2014 | 6/30/2014 | | \$155,548 | \$272,937 | \$128,437 | \$300,048 | | | \$0 |
| F3N | 12P | N | 8/14/2014 | 108 | 14970087018 | 7/1/2014 | 8/6/2014 | | \$300,048 | \$105,830 | \$351,977 | \$54,201 | | | \$0 |
| F3A | 12P | A | 8/30/2014 | 108 | 14950093337 | 7/1/2014 | 8/6/2014 | | \$300,048 | \$103,230 | \$351,277 | \$52,001 | | | \$0 |
| F3N | Q3 | N | 10/7/2014 | 141 | 14978094119 | 8/7/2014 | 9/30/2014 | | \$52,001 | \$224,913 | \$187,460 | \$89,455 | \$51,500 | | \$51,500 |
| F3A | Q3 | A | 10/22/2014 | 142 | 14951893124 | 8/7/2014 | 9/30/2014 | | \$89,455 | \$51,928 | \$28,473 | \$112,910 | \$47,500 | | \$47,500 |
| F3N | 12G | N | 10/23/2014 | 36 | 14952419241 | 10/1/2014 | 10/15/2014 | | \$89,455 | \$51,928 | \$82,787 | \$58,596 | \$43,500 | | \$43,500 |
| F3A | 12G | A | 12/4/2014 | 46 | 1495272123 | 10/1/2014 | 10/15/2014 | | \$89,455 | \$51,928 | \$81,787 | \$59,596 | \$43,500 | | \$43,500 |
| F3A | 12G | A | 1/31/2015 | 46 | 15970243558 | 10/1/2014 | 10/15/2014 | | \$89,455 | \$51,928 | \$81,787 | \$59,596 | \$43,500 | | \$43,500 |
| F3A | 12G | A | 2/10/2015 | 47 | 15970263322 | 10/1/2014 | 10/15/2014 | | \$89,455 | \$51,928 | \$81,787 | \$59,596 | \$43,500 | | \$43,500 |
| F3N | 30G | N | 12/4/2014 | 65 | 14952732616 | 10/16/2014 | 1/24/2014 | | \$58,596 | \$104,775 | \$00,630 | \$63,832 | \$37,000 | | \$37,000 |
| F3A | 30G | A | 2/10/2015 | 69 | 15970263390 | 10/16/2014 | 1/24/2014 | | \$58,596 | \$104,775 | \$99,540 | \$63,831 | \$43,500 | | \$43,500 |
| F3N | YE | N | 1/31/2016 | 36 | 16950680786 | 11/26/2014 | 12/31/2014 | | \$63,832 | \$16,210 | \$66,810 | \$4,163 | (\$16,000) | | (\$16,000) |
| F3A | YE | A | 2/10/2015 | 26 | 15950605937 | 11/25/2014 | 12/31/2014 | | \$63,831 | \$16,210 | \$55,879 | \$24,162 | \$16,500 | | \$16,500 |
| F2 | N | | 3/3/2014 | 3 | 14031192273 | | | | | | | | | | |
| F1 | N | | 3/3/2014 | 6 | 14031192266 | | | | | | | | | | |
| F1 | A | | 4/4/2014 | 6 | 14031212583 | | | | | | | | | | |
| F1A | A | | 4/11/2014 | 4 | 14960656326 | | | | | | | | | | |
| F2N | N | | 4/11/2014 | 1 | 14960656343 | | | | | | | | | | |
| F1A | A | | 6/10/2014 | 4 | 14961240104 | | | | | | | | | | |
| F6N | N | | 8/10/2014 | 1 | 14970003654 | | | | | | | | | | |
| F6N | N | | 8/14/2014 | 1 | 14970079999 | | | | | | | | | | |
| F6N | N | | 10/3/2014 | 1 | 14952558826 | | | | | | | | | | |
| F6N | N | | 10/31/2014 | 1 | 14952562007 | | | | | | | | | | |
| F6N | N | | 11/2/2014 | 1 | 14952565996 | | | | | | | | | | |
| F1A | A | | 11/7/2014 | 4 | 14952574228 | | | | | | | | | | |
| F6N | N | | 10/28/2014 | 1 | 14952555871 | | | | | | | | | | |
| F6N | N | | 8/23/2014 | 1 | 14970729139 | | | | | | | | | | |
| F6N | N | | 10/18/2014 | 1 | 14950892727 | | | | | | | | | | |

| Form | Tr | Rpt | Typ | A/I | Receipt | Dt | Pgs | Begin | Img# | End | Cvg | Dt | Begin | Cash | Recpts | Disb | End | Cash | Debts | Loans | Debits | Loans | | |
|---------------|----|-----|-----|-----|---------|------------|-----|-------------|------|-----|-----|----|-------|------|--------|------|-----|------|-----------|-----------|--------|-------|--|--|
| F6N | | | | | | 10/22/2014 | 1 | 14951892788 | | | | | | | | | | | | | | | | |
| F6A | | | | | | 10/22/2014 | 1 | 14951893116 | | | | | | | | | | | | | | | | |
| F1A | | | A | | | 10/21/2014 | 4 | 14951876812 | | | | | | | | | | | | | | | | |
| F6N | | | | | | 10/25/2014 | 1 | 14952549607 | | | | | | | | | | | | | | | | |
| F6N | | | | | | 10/26/2014 | 1 | 14952549664 | | | | | | | | | | | | | | | | |
| F6N | | | | | | 10/23/2014 | 1 | 14952539082 | | | | | | | | | | | | | | | | |
| Totals | | | | | | | | | | | | | | | | | | | \$936,188 | \$911,026 | | | | |

O-Index (2011-2012)
 Cmte. ID: C00558627 Cmte. Name: GALLEGO FOR ARIZONA
 Treasurer Name: WININGER, REBECCA Address: PO BOX 1710, PHOENIX, AZ 85001
 Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY PILER

| Form | Tr | Rpt | Typ | A/I | Receipt | Dt | Pgs | Begin | Img# | End | Cvg | Dt | Begin | Cash | Recpts | Disb | End | Cash | Debts | Loans | Debits | Loans |
|------|----|-----|-----|-----|---------|----|-----|-------|------|-----|-----|----|-------|------|--------|------|-----|------|-------|-------|--------|-------|
|------|----|-----|-----|-----|---------|----|-----|-------|------|-----|-----|----|-------|------|--------|------|-----|------|-------|-------|--------|-------|

No records were found for this cycle.

Gallego for Arizona (C00558627)

2014 12 Day Pre-General Report/Amended 2014 12 Day Pre-General Report

Overview of Additional Disbursements

| Report Line | 2014 12 Day Pre-General Report (Image 14952419244) | Amended 2014 12 Day Pre-General Report, received 2/10/15 (Image 15970263325) | Disbursement Variance Amount |
|------------------------------------|--|---|------------------------------------|
| Line 17: Operating Expenditures | \$22,473.42 | \$20,787.49 | -\$1,685.93 |
| Line 21: Other Disbursements | \$6,000.00 | \$61,000.00 | \$55,000.00 |
| | | Total Variance: | \$53,314.07 |