



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

February 27, 1998

MEMORANDUM

TO: Ron M. Harris
Press Officer
Press Office

FROM: Robert J. Costa *RC*
Assistant Staff Director
Audit Division

SUBJECT: Public Issuance of the Report of the Audit Division on
Bob Barr — Congress

Attached please find a copy of the final audit report on Bob Barr — Congress which was approved by the Commission on February 18, 1998.

Informational copies of the report have been received by all parties involved and the report may be released to the public.

cc: Office of General Counsel
Office of Public Disclosure
Reports Analysis Division
FEC Library

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61-5101-110-100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**FINAL AUDIT REPORT
ON
BOB BARR — CONGRESS
EXECUTIVE SUMMARY**

The Committee registered with the Clerk of the U.S. House of Representatives on January 11, 1995 as the principal campaign committee of Robert L. Barr, Republican candidate for the U.S. House of Representatives from the State of Georgia, 7th District.

The audit was conducted pursuant to 2 U.S.C. §438(b), which states that the Commission may conduct audits of any political committee whose reports fail to meet the threshold level of compliance set by the Commission.

The findings of the audit were presented to the Committee at an exit conference held at the end of audit fieldwork (5/23/97) and later in an interim audit report. The Committee's responses have been included in the findings set forth in this summary.

The following is an overview of the findings contained in the final audit report.

APPARENT EXCESSIVE CONTRIBUTIONS — INDIVIDUALS — Section 441a(a)(1)(A) of Title 2. The audit identified 72 contributors who exceeded their contribution limitation by a total of \$54,971. The Committee refunded \$36,626 to contributors well beyond the 60 day period provided for making such refunds, leaving \$18,345 unresolved.

In response to the interim audit report, the Committee provided copies of the front of refund checks for the remaining excessive contributions. Committee representatives stated that copies of the back of the refund checks would be forwarded upon receipt.

MISSTATEMENT OF FINANCIAL ACTIVITY — 2 U.S.C. §434(b)(1),(2) and (4). The Committee understated its 1996 disbursements by a total of \$4,308. This net understatement is the result of \$16,410 in overstatements and \$20,718 in understatements.

Ending cash on hand for 1995 was overstated by a total of \$3,434 due to minor misstatements in receipts and disbursements as noted above. As a result of the misstatement of 1996 disbursements and beginning cash on hand noted above, as well as minor discrepancies in 1996 receipts, the Committee's reported cash on hand at 12/31/96 of \$18,908 was overstated by \$8,326. The correct cash balance was \$10,582.

The Committee responded by filing amended reports, which materially corrected these misstatements.

DISCLOSURE OF CONTRIBUTIONS FROM POLITICAL COMMITTEES — 2 U.S.C. §434(b)(3)(B). The audit identified 82 contributions, totaling \$53,417, which had not been itemized. In addition, 26 contributions with a value of \$21,508 had been itemized incorrectly. Also, testing indicated additional problems with the disclosure of aggregate year to date amounts.

In response to the interim audit report, the Committee filed comprehensive amended disclosure reports which materially corrected the disclosure problems noted above.

DISCLOSURE OF CONTRIBUTIONS FROM INDIVIDUALS — 2 U.S.C. §434(b)(3)(A). Testing conducted during fieldwork showed that the Committee had misstated the contributor's aggregate year to date contributions in a material number of cases.

The Committee indicated that it was aware that the software seemed unable to handle aggregate year to date amounts correctly. Amended Schedules A materially corrected these disclosure problems.

REPORTING OF TRANSFERS FROM AUTHORIZED COMMITTEES — 2 U.S.C. §434(b)(3)(C). The Committee received a total of \$39,228 from other committees authorized by its candidate. It failed to report \$2,500 from authorized committees on line 12 of its Detailed Summary Pages and filed Schedules A for only one \$1,500 transfer.

In response to the interim audit report, an amended Detailed Summary Page and Schedules A were filed.

48 HOUR NOTICES - INDIVIDUAL AND POLITICAL COMMITTEES — 2 U.S.C. §434(a)(6). The Audit identified 19 primary election contributions, totaling \$29,804, and 18 general election contributions totaling \$20,000 for which the Committee failed to file the required 48 hour notices.

The Committee responded that the candidate had been unopposed for the primary election and it assumed that notices were not required.



**REPORT OF THE AUDIT DIVISION
ON
BOB BARR — CONGRESS**

I. BACKGROUND

A. AUDIT AUTHORITY

This report is based on an audit of Bob Barr — Congress (the Committee), undertaken by the Audit Division of the Federal Election Commission in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended (the Act). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this subsection, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

B. AUDIT COVERAGE

The audit covered the period from the Committee's initial deposit on January 27, 1995 through December 31, 1996. The Committee reported a beginning cash balance of \$0; total receipts for the period of \$1,173,888; total disbursements for the period of \$1,154,980; and an ending cash balance of \$18,908.¹

C. CAMPAIGN ORGANIZATION

The Committee registered with the Clerk of the U.S. House of Representatives on January 11, 1995 as the principal campaign committee of Robert L. Barr (the Candidate), Republican candidate for the U.S. House of Representatives from the State of Georgia, 7th District.

¹ All amounts in this report have been rounded to the nearest dollar.

The Treasurer of the Committee is Charles C. Black, who has served in this position since the inception of the Committee. The Committee maintains its headquarters in Austell, Georgia.

To manage its financial activity, the Committee used one bank account. From this account, it made approximately 1,300 disbursements. The Committee received about 5,070 contributions from individuals, totaling approximately \$708,670, which represented about 60% of its total receipts. In addition, the Committee received about 510 contributions from political action committees and other committees, such as party committees and candidate committees, totaling approximately \$420,648 (or 36% of total receipts); and received interest (\$4,090) and transfers from other authorized committees (\$39,228).

D. AUDIT SCOPE AND PROCEDURES

The audit included testing of the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitations (see Finding II.A.);
2. the receipt of contributions from prohibited sources; such as those from corporations or labor organizations;
3. proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of contributions when required, as well as, the completeness and accuracy of the information disclosed (see Findings II.C., II.D. and II.E.);
4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed;
5. proper disclosure of Committee debts and obligations;
6. the accuracy of total reported receipts, disbursements and cash balances as compared to Committee bank records (see Finding II.B.);
7. adequate recordkeeping of Committee transactions, and
8. other audit procedures that were deemed necessary in the situation (see Finding II.F).

FINDINGS

Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue any of the matters discussed in this report in an enforcement action.

II. AUDIT FINDINGS AND RECOMMENDATIONS

A. APPARENT EXCESSIVE CONTRIBUTIONS

Sections 441a(a)(1)(A) and (a)(2)(A) of Title 2 of the United States Code state, that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000 and that no multi-candidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$5,000.

Sections 110.1(b)(5)(i) and (ii) of Title 11 of the Code of Federal Regulations state, in relevant part, that the treasurer of an authorized political committee may request a written redesignation of a contribution by the contributor for a different election if:

- the contribution was designated in writing for a particular election and the contribution, either on its face or when aggregated with other contributions from the same contributor for the same election, exceeds the limitation on contributions set forth in 11 CFR 110.1(b)(1);
- the contribution was designated in writing for a particular election and the contribution was made after that election and the contribution cannot be accepted under the net debts outstanding provisions of 11 CFR 110.1(b)(3);
- the contribution was not designated in writing for a particular election, and the contribution exceeds the limitation on contributions set forth in 11 CFR 110.1(b)(1); or
- the contribution was not designated in writing for a particular election, and the contribution was received after the date of an election for which there are net debts outstanding on the date the contribution is received.

Additionally, a contribution shall be considered to be redesignated for another election if the treasurer of the recipient authorized political committee requests that the contributor provide a written redesignation of the contribution and informs the contributor that the contributor may request the refund of the contribution as an alternative to providing a written redesignation and within sixty days from the date of the

treasurer's receipt of the contribution, the contributor provides the treasurer with a written redesignation of the contribution for another election, which is signed by the contributor.

Section 110.1(k) of Title 11 of the Code of Federal Regulations states, any contribution made by more than one person shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. Furthermore, a contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor.

If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions set forth in 11 CFR 110.1(b) or (d), as appropriate, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person, and informs the contributor that he or she may request a return of the excessive portion of the contribution if it is not intended to be a joint contribution; and, within 60 days from the date of the treasurer's receipt of the contribution, the contributors provide a written reattribution of the contribution which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

The Audit staff was provided with a computer file to support contributions received by the Committee. In addition, deposit records which included copies of contributor checks and/or deposit tickets with contributor names were available for the majority of contributions. The copies of contributor checks were ordered by deposit for the period of January 27, 1995 (the date of the first deposit) through August 31, 1996, and the documentation available for this time frame was 98% complete. For the period of September 1, through December 31, 1996, the checks were in no identifiable order. For this period of time, documentation was incomplete. Deposit tickets with supporting check copies were found for 46% (\$176,203) of receipts and deposit tickets with incomplete check copies were found for 41% (\$158,605). In addition, random check copies totaling about \$296,280 or 77% of total amounts for this period were available. These checks were sorted alphabetically to facilitate testing.

The receipts database and the contributor checks were utilized in a combination of reviews to determine if contributions in excess of the limitation were received. Based on these reviews, the Audit staff identified 94 contributions from 72 individuals which exceed the limitations by \$54,971.

Further review of these excessive contributions revealed the following reporting irregularities:

- Twelve of the excessive contributions (from individuals) totaling \$7,945 were not itemized on Schedules A although our testing did not indicate a material overall failure to itemize contributions.
- Twenty-four contributions were attributed to multiple account holders on the Committee's disclosure reports but the contribution documentation contained the signature of only one contributor. No signed reattributions were located in the Committee's files.
- Nineteen contributions were allocated between the primary and general Elections on the Committee's disclosure reports or were disclosed as general election contributions but dated before the primary. No signed designations or redesignation correspondence was located in the Committee's records.
- Finally, one \$2,000 check was itemized as a \$1,000 contribution.

The Committee received numerous inquiries from the Commission's Reports Analysis Division concerning excessive contributions. Its response was to amend Schedules A and disclose the contributions as attributed to another person or to attribute part or all of a contribution to another election. The audit did not find the requisite documentation to support these actions. Based upon the results of this review, it appears that the Committee was internally reattributing and redesignating contributions without the required authorizations.

Previously, the Commission conducted an audit of Congressman Barr's 1993-1994 Committee. The report which presents the results of this audit was issued on April 19, 1996. During this audit, many of the same problems were noted. As a result of that audit, 62 contributions from 47 contributors were identified that exceeded contribution limitations by \$40,804. Irregularities in the itemization and disclosure of many of these contributions were similar to the reporting problems noted above. In addition, in the earlier audit, notes were found on the photocopies of three excessive contribution checks. These notes indicated that the Committee was aware that the contributions were excessive and either did not record them, or recorded them so that they did not appear to be excessive. Also, 12 contributors who made excessive contributions in the 1993-1994 election cycle also made excessive contributions in the 1995-1996 election cycle.

In September of 1996, the Committee wrote numerous contribution refund checks. These checks were subsequently voided² and reissued in October of 1996. When the Audit staff questioned the voiding of the September refunds, a Committee

² The Audit staff was not able to see actual copies of voided checks because the Committee treasurer did not keep them. The Treasurer informed the Audit staff that he had disposed of voided or spoiled checks.

representative intimated that the Committee wanted to keep their cash on hand position looking as strong as possible on their reports. Fifty-four refunds totaling \$36,626 relating to the excessive contributions noted above were made³. At the time of the interim audit report, \$18,345 in unresolved excessive contributions remained. None of the refunds made were within allowable time limits.

The Audit staff's review also identified apparent excessive contributions from two registered political committees. The Committee received a \$2,000 check dated September 24, 1996, for the general election from the Carpet and Rug Institute, a non-qualified political committee, and three contributions totaling \$10,000 (\$500- 8/2/95, \$4,500 - 11/8/95 and \$5,000 - 3/27/96) from the Lockheed Martin Employees' Political Action Committee for the primary election. The Committee refunded \$5,000 to Lockheed Martin on April 28, 1997. This refund was untimely. The Committee had not refunded any money to the Carpet and Rug Institute.

At the exit conference, the Committee was supplied with workpapers documenting the excessive contributions. Committee representatives indicated that they were surprised at the amount of unresolved contributions, but agreed to review each one carefully. They indicated that procedures were being put into place to avoid any future problems.

In the interim audit report, the Committee was requested to provide evidence demonstrating that the contributions in question were not excessive. Absent such evidence, the Committee was to refund the remaining excessive contributions and provide evidence of such refunds (copies of the front and back of the canceled checks). If sufficient funds were not available, those contributions requiring refunds would be disclosed as debts on Schedule D (Debts and Obligations) until such time as funds became available.

In response to the interim audit report, the Committee demonstrated that two contributions from one individual, totaling \$4,000, were not excessive.⁴ The remaining excessive contributions, totaling \$16,345, were refunded and copies of the front of the checks were provided. In its written response the Committee stated that it would "submit copies of the front and back of negotiated checks when available." To date, they have not done so.

³ As of February 28, 1997, all but four (\$2,350) of these refund checks have cleared the Committee's checking account. The contributions associated with these checks were included in total excessive amounts and the Committee re-issued refund checks to the contributors.

⁴ The Committee supplied documentation showing that contributions thought to be from one contributor were in fact four separate in-kind contributions of \$1,000 each, attributable to the contributor and his spouse. This in fact caused a smaller excessive amount for the spouse, which the Committee refunded.

In addition to refunding contributions to excessive contributors, the Committee stated that:

the failure to detect these excessive contributions was due to a data management that could not keep up with the volume of contributions. Any errors are ones of omission rather than commission. Although the committee made efforts to either reattribute or redesignate the funds in question (as was the case in the 1994 election cycle),⁵ such efforts did not strictly comply with the applicable regulations.

The Committee sent a copy of a redesignation form it states was used during the 1996 election cycle. The Audit staff had reviewed available redesignation and reattribution letters during the audit and found only four that related to excessive contributions. Of these, one redesignation letter was signed by a person other than the contributor, two letters redesignated contributions to the general election but the contributor had also made excessive contributions for that election, and one letter appropriately redesignated the excessive amount but the Committee refunded the contribution anyway. No other redesignation or reattribution documentation has been provided.

The Committee also filed comprehensive amended disclosure reports for years 1995 and 1996 that materially corrected the disclosure errors noted above.

B. MISSTATEMENT OF FINANCIAL ACTIVITY

Sections 434(b)(1), (2) and (4) of Title 2 of the United States Code state, in part, that a political committee shall disclose the amount of cash on hand at the beginning of the reporting period and the total amount of all receipts and all disbursements for the reporting period and calendar year.

The Audit staff reconciled the Committee's reported financial activity to bank activity for calendar years 1995 and 1996. The Committee treasurer informed the Audit staff that unitemized amounts on reports were derived by subtracting total itemized amounts from bank figures, in essence using unitemized amounts to reconcile to bank activity. The Committee was unable to provide complete workpapers showing the calculation of these derived figures, which prevented the Audit staff from identifying all differences.

⁵ In its written response, the Committee objected to the Audit staff's statement that notes found on three photocopies of checks indicated that the Committee was aware that the contributions were excessive and either did not record them or recorded them so that they did not appear to be excessive.

The Committee reported a beginning cash on hand balance of \$175,524.48 as of January 1, 1996. This amount was over-stated by a total of \$3,434 which was caused by minor misstatements of 1995 receipts and disbursements.

The Committee reported disbursements of \$976,659 for 1996. Utilizing the Committee's financial records, the Audit staff determined that the Committee should have reported disbursements totaling \$980,967. Therefore, disbursements were understated by \$4,308. This misstatement was due to \$14,327 in disbursements reported twice on Schedules B; reporting of a \$438 stop payment disbursement; in-kind contributions not reported totaling \$6,946; two 1995 disbursements totaling \$1,645 reported in 1996; under-reporting of disbursements for the year by \$11,124, and a reconciling adjustment of \$2,649. Misstatements of receipts in 1996 were not material.

As a result of the misstatement of 1996, disbursements and beginning cash on hand noted above, as well as minor discrepancies in 1996 receipts, the Committee's reported cash on hand at 12/31/96 of \$18,908 was overstated by \$8,326. The correct cash balance was \$10,582.

Subsequent to the end of fieldwork, the Audit staff provided the Committee with workpapers detailing the discrepancies noted. A Committee representative indicated that amended disclosure reports would be filed.

In the interim audit report, the Audit Staff recommended the Committee file a comprehensive amended report for calendar year 1996 correcting the misstatements noted above.

The Committee complied with the Audit recommendation by filing amended reports for both 1995 and 1996. Those reports materially correct the problems noted above.⁶

C. DISCLOSURE OF CONTRIBUTIONS FROM POLITICAL COMMITTEES

Section 434(b)(3)(B) of Title 2 of the United States Code states that each report under this section shall disclose the identification of each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and the amount of any such contribution.

The Audit staff reviewed contributions from political committees to determine if they were itemized as required. Our review identified 82 contributions, totaling \$53,417, which had not been itemized. Of these contributions, 48 had not been entered into the Committee's database.

⁶ Although it was not required to do so, the Committee corrected 1995 items noted in workpapers provided to them.

In addition, 26 contributions with a value of \$21,508 had been itemized on line 11(a)(i) (contributions from individuals), generally in the name of the person who had signed the committee's contribution check, or on line 11(c) under the name of another political committee. Finally, our sample testing indicated additional problems with the disclosure of aggregate year to date amounts.

The Committee was provided with schedules detailing the itemization and disclosure problems noted above. A Committee representative responded by asking if the contributions were on the database, and if the contributions might be on the disclosure reports in different places. The Committee also indicated that amended Schedules A would be filed.

In the interim audit report, the Committee was requested to file, as part of a comprehensive amended report, Schedules A to correct the itemization and disclosure problems noted above.

In response to the recommendation, the Committee filed the required schedules. These amended schedules materially corrected the itemization and disclosure problems noted above.

D. REPORTING OF TRANSFERS FROM AUTHORIZED COMMITTEES

Section 434 (b)(3)(C) of Title 2 of the United States Code states that each report under this section shall disclose the identification of each authorized committee which makes a transfer to the reporting Committee.

The Audit staff reviewed the Committee's receipts records and determined that, in 1996, the Committee received transfers from authorized committees totaling \$39,228. The Committee received a total of \$36,728 from the Candidate's 1994 authorized committee "Bob Barr for Congress 94". The remaining \$2,500 came from Georgians for Bob Barr, the Candidate's 1992 Senate committee. Of these amounts, \$36,728 was reported on line 12 of the Committee's Detailed Summary Pages, but supporting Schedules A were filed for only one \$1,500 transfer.

Subsequent to the end of fieldwork, the Committee was supplied with schedules detailing these transfers. Committee representatives indicated a willingness to file amended reports.

As stated in the interim audit report, the Committee was required to file a Schedule A itemizing the transfers noted above, and correct the total amount reported on line 12 of the amended Detailed Summary Page to reflect the correct amount received from authorized committees. The Committee's amended report for 1996 included the necessary corrections.

E. DISCLOSURE OF CONTRIBUTIONS FROM INDIVIDUALS

Section 434(b)(3)(A) of Title 2 of the United States Code states that each report under this section shall disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution.

The Audit staff tested the Committee's reporting of contributions from individuals to determine compliance with the regulations. Our results indicate that the Committee had misstated the contributor's aggregate year to date contributions in a material number of cases. As noted in Finding II.C., a similar deficiency was noted with respect to the reporting of contributions from other committees.

When presented with the preliminary results of this review at the exit conference, a Committee representative responded that they were aware that the software did not seem able to handle aggregate year to date amounts accurately. No other comments were made regarding this problem.

In the interim audit report, it was recommended that the Committee file amended Schedules A correcting the aggregate year to date figures for contributions from individuals.

In response to this recommendation, the Committee filed amended Schedules A for both 1995 and 1996, correcting aggregate year to date figures for a material number of contributors.

F. FAILURE TO FILE FORTY-EIGHT HOUR NOTICES

Section 434(a)(6) of Title 2 of the United States Code states, in relevant part, a principal campaign committee of a candidate shall notify the Clerk, the Secretary, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by any authorized committee of such candidate after the 20th day, but more than 48 hours before, any election. This notification shall be made within 48 hours after the receipt of such contribution and shall include the name of the candidate and the office sought by the candidate, the identification of the contributor, and the date of receipt and amount of the contribution.

The Audit staff's review identified 19 contributions, totaling \$29,804, deposited between June 20, 1996 and July 6, 1996, requiring 48 hour notices for the primary election. The Committee failed to file the required notices for all of these contributions. In addition, between October 17, 1996 and November 2, 1996, 60 contributions, totaling \$74,000, required 48 hour notices to be filed for the general election. The Committee did not file notices for 18 contributions totaling \$20,000.

The Audit staff informed the Committee of this problem at the exit conference and provided workpapers which identified these contributions. The Committee representatives responded that they did not think notices were required for the primary election because Congressman Barr was unopposed in that election. As for the notices required for the general election, the Committee responded that they thought all required notices had been filed.

The Audit staff's recommendation in the interim audit report requested that the Committee submit evidence that all required notices were filed or submit any written comments it felt would be relevant to this issue.

In its response, the Committee conceded that it had failed to file all required notices for the primary election and 18 notices for the general. The Committee stated in relevant part:

This failure was due to a misunderstanding of the applicable law. Since the candidate was unopposed in the primary, the committee assumed that such notices were rendered unnecessary.

As for the general election, the Audit establishes that the Committee filed 48-hour notices for at least 42 of 60 contributions requiring such notices (over two thirds). Despite the Committee's prior good faith belief that all required notices had been filed, the committee concedes that 48-hour notices were not filed for the remaining contributions.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20542

February 20, 1998

Mr. Charles Black, Treasurer
Bob Barr — Congress
P.O. Box 4323
Marietta, GA 30061

Dear Mr. Black:

Attached, please find the Report of the Audit Division on Bob Barr — Congress. The Commission approved the report on February 18, 1998.

The Commission approved Audit Report will be placed on the public record on February 27, 1998. Should you have any questions regarding the public release of the report, please contact the Commission's Press Office at (202) 219-4155 or toll free at (800) 424-9530. Any questions you have related to matters covered during the audit or in the report should be directed to Rhonda Simmons or Russ Bruner of the Audit Division at (202) 219-3720 or the above toll free number.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Costa".

Robert J. Costa
Assistant Staff Director
Audit Division

Attachment as stated

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CHRONOLOGY

BOB BARR — CONGRESS

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| Audit Fieldwork | 4/28/97 - 5/23/97 |
| Interim Audit Report to the Committee | 10/6/97 |
| Response Received to the Interim Audit Report | 12/24/97 |
| Final Audit Report Approved | 2/18/98 |

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