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As permitted by Federal Election Commission regulations, Williams, Mullen, Clark & Dobbins, P.C., (the 'Firm') uses a payroll deduction system to solicit and collect voluntary contributions from its restricted class and deposits them into its separate segregated fund. In accordance with 11 CFR 102.6(b)(1)(ii), the Firm acts as a 'collecting agent' in this regard. Since its inception, the Williams, Mullen, Clark & Dobbins P.C., Political Action Committee (the 'Williams Mullen PAC') (FEC ID# C00515189) has been funded in part with payroll deductions collected by the Firm. On approximately October 15, 2013, due to uncertainty about the future need for the Williams Mullen PAC, a decision was made that the deductions should no longer be deposited into the Williams Mullen PAC account until the uncertainty about future funding was resolved. Therefore, for a period from October 31, 2013 to February 14, 2014, the Firm continued to make deductions, but the deductions were never deposited into the Williams Mullen PAC account. Instead, the funds were held in an account of the Firm. It was intended that any amounts not ultimately transferred to the Williams Mullen PAC would be refunded to the Firm employee from whom the deduction was taken. When the Firm realized in mid-February that holding funds in suspense might be inappropriate, it immediately contacted the FEC for guidance. After looking into the matter during the week of February 17-21st, the analyst for the Williams Mullen PAC, recommended that the Firm deposit all withheld funds into the Williams Mullen PAC account and amend the 2013 year-end report and any subsequent reports. Therefore, we are amending the 2013 Year-End report and the February 20 2014 Monthly report and submitting this brief narrative explanation under the direction of our analyst, Arman Tarzi, and under the guidance found Advisory Opinion 2000-11.
