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NAME OF COMMITTEE (In Full)  
National PAC

FEC IDENTIFICATION NUMBER  
C00150995

Mailing Address 9 S 753 circle avenue

City	State	ZIP Code
willowbrook	IL	60527

In 1982, Marvin Josephson was the Founding Chairman of National PAC. He lives in New York. Warren O'Hearn was an independent contractor, who lived in Washington, DC and was the Treasurer of NATPAC. Josephson made the political contributions and signed the checks to political candidates. O'Hearn was responsible for receiving contributions and maintaining the records of NATPAC, including preparing and filing the FEC reports.

In the 80's and 90's, NATPAC raised significant money for political contributions. In several cycles it raised more than \$1 million. Josephson, who will be 90 years this week, has diminished interest in NATPAC's activities and NATPAC is no longer a large political action committee. His contact with O'Hearn was reduced.

In the spring of 2016, Josephson unsuccessfully tried to contact O'Hearn on several occasions. In July 2016 he discovered that O'Hearn had died alone in his apartment in Washington, DC on June 7, 2016. More than a month had elapsed since his death and there had been a police investigation to make sure he died of natural causes. O'Hearn's mother had already disposed of his belongings and it is unknown what happened to all of his records.

Marvin Josephson was interested in discontinuing his activities with NATPAC because of his age. In September, 2016 I became Treasurer of NATPAC. Mr. Josephson was able to provide me with bank statements from January 2016 forward so that I could build the 2016 history and continue on with NATPAC's reporting to the FEC.

O'Hearn filed the 2016 1st quarter FEC report. The 2016 2nd quarter report was filed by me in September 2016, although it was due July 15, 2016.

When completing the 2016 2nd quarter report, I began with what I knew to be the COH at 3/31/16,(but entered that amount as 1/1/16 because my FECFile didn't include 1st quarter 2016) which didn't coincide with O'Hearn's previous FEC reporting. On 2/8/17 the FEC sent a letter to me stating that our 2nd quarter 2016 report was incorrect and needed amending to coincide with O'Hearn's 1st quarter COH balance. However, the COH balance I initially reported is the correct balance. I inherited this discrepancy.

I spoke with Michael-Ann Henry of the FEC on how to move forward. As instructed, I built my FEC file from 3/31/16 back to the end of 2015. I submitted revisions to the FEC on 2/15/17. However, the COH reported to the FEC vs the actual COH is still incorrect.

I spoke to Michael-Ann about finding/reporting the discrepancies. She suggested that we obtain 2015 bank statements and perform an internal review to see if we could find differences.

I obtained the 2015 bank statements and have tried to reconcile a (\$8,944.29) difference between what was reported to the FEC at 3/31/16 vs the actual bank balance. In order to reconcile this difference, I need access at least to O'Hearn's records which are not available. I tried various strategies but cannot reconcile.

I investigated unexplained "telephone transfers" on the bank statements. I found they were transfers to/from NATPAC related accounts and had no bearing on reconciling the bank balance.

I reviewed the COH reported to the FEC vs the actual COH per the bank statements:

"The difference in COH reported on 3/31/16 to the FEC was \$8,944.29 more than 3/31/16 actual COH. This is the difference that we are trying to reconcile.

"The difference in COH reported on 12/31/15 to the FEC was \$8,949.17 more than 12/31/15 actual COH (as compared to the \$8,944.29 more reported 3/31/16).

"The difference in COH reported on 6/30/15 to the FEC was \$21,808.02 more than the 6/30/15 actual COH (as compared to the \$8,944.29 more reported 3/31/16).

"The difference in COH reported on 1/1/15 to the FEC was \$6,144.66 less than the 1/1/15 actual COH (as compared to the \$8,944.29 reported 3/31/16).

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There is no pattern to the differences reported to the FEC vs the actual COH. This sheds no light on the reason for the difference. Unfortunately, I am unable to ascertain the reason for these variations.

In addition, I have found the following discrepancies in 2015:

"Philip Darivoff made a contribution of \$2,500 via credit card on June 1, 2015 to NATPAC. It was reported to the FEC as a \$5,000 contribution.

"Jon Diamond authorized a \$5,000 credit card contribution. We can find no record of O'Hearn processing the contribution nor reporting it to the FEC.

"Michael Levin wrote a check on March 16, 2015 for \$2,500 to NATPAC. There is no record of this check being deposited nor was it reported to the FEC. Levin reported that his check had not cleared his checking account and when O'Hearn was queried about this check, he claimed it was deposited 5/2/15.

While these are errors in reporting they do not disclose any information on the \$8,944.29 difference.

We have tried everything we can think of that might help us to reconcile the discrepancy. I have spent a large amount of time trying to imagine how Mr. O'Hearn came to this figure and am unable to think of anything more that would yield a possible positive result. We have proved up the COH we originally reported. At Michael-Ann's direction I changed the 3/31/16 balance to match O'Hearn's submission, this this amount is incorrect.

Without having access to O'Hearn or his records, it is impossible to understand the discrepancy. We inherited this mistake and cannot determine the reason for it. It is our intent to make a one-time adjustment on line 17 of our mid-year 2017 report of (\$8,944.29) in order to reflect the true COH balance of NATPAC.