

21L-08

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 16, 2021

ANALYST: Terez Ray

I. COMMITTEE: International Brotherhood of Boilermakers
Campaign Assistance Fund
C00005157
William T. Creeden, Treasurer
753 State Avenue
Suite 565
Kansas City, KS 66101

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)
11 CFR § 104.3(a)

III. BACKGROUND:

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

International Brotherhood of Boilermakers Campaign Assistance Fund (“the Committee”) amended its 2020 August Monthly Report to disclose additional receipts totaling \$159,492.93 which were not disclosed on the original report (Attachment 2).

On August 18, 2020, the Committee filed the original 2020 August Monthly Report covering the period from July 1, 2020 through July 31, 2020. The report disclosed no receipts on Line 11(a)(i) (Itemized Contributions from Individuals) or Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 202008189261344138).

On November 25, 2020, The Committee filed an Amended 2020 August Monthly Report. The report disclosed \$17,312.84 in receipts on Line 11(a)(i) and \$142,180.09 in receipts on Line 11(a)(ii) of the Detailed Summary Page, a total increase of \$159,492.93 from the original report (Image 202011259337132857). The Committee included a memo text in the report, which stated:

“This report is being amended to disclose adjusted itemized and unitemized amounts (lines 11a(i) and 11a(ii)) as well as update the Year To Date total receipts. The Year to Date disbursement total has also been adjusted. Due to logistical issues with our payroll department and our PAC management vendor as a result of COVID-19 we were unable to collect our data for September payroll deduction contributions in time to be disclosed on our original October Monthly Report which was timely filed” (Image 202011259337132860).

On January 18, 2021, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2020 August Monthly Report, received November 25, 2020. The RAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2020 August Monthly Report (Images 202101180300101128-29).

On February 19, 2021, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission), which stated, in part:

“This letter is being submitted to respond to the RAI dated January 18, 2021 regarding \$159,492.93 in additional receipts reported on the Amended August Monthly Report.

Due to logistical issues with our payroll department and our PAC management vendor as a result of COVID-19, we were unable to collect our data for July payroll deduction contributions in time to be disclosed on our original August Monthly Report which was timely filed.

The Amended August Monthly Report's increase in receipts is correct. We have made adjustments to this process so that the receipt data will be accurately reported going forward and do not anticipate a repeat of this issue in the future.

I trust this addresses the Committee's concerns, but if there are any other questions please do not hesitate to contact me” (Image 202102199428641587).

On February 23, 2021, The Reports Analysis Division (RAD) Analyst called William Creeden, the Committee's Treasurer. The Analyst left a message for Mr. Creeden regarding an outstanding matter on the Amended 2020 August Monthly Report. The Analyst requested that Mr. Creeden return the call as soon as possible (Attachment 3).

Later the same day, Kyle Folsom, a Committee Representative, returned the phone call to the Analyst regarding the increase of receipts disclosed on the 2020 August Monthly Report. The Analyst explained that the unresolved issue may be referred to another Commission office for potential further action. The Analyst explained that the Committee

could provide an additional FEC Form 99 with clarifying information. Mr. Folsom said he would speak with his colleagues to see if they would like to provide additional clarification (Attachment 3).

On March 4, 2021, the Committee filed an FEC Form 99, which stated, in part:

“This letter is submitted in response to your phone call on February 23, 2021 in which you requested further clarification of the explanation included in our letter dated February 19, 2021. That letter responded to your Request for Additional Information (RAFI) concerning the \$159,492.93 in additional receipts disclosed on the amended August Monthly Report.

Due to the COVID virus, the Boilermakers offices were unexpectedly closed last year. We anticipated that the offices would be closed for two weeks and contingency plans were not immediately established and adopted. New policies and procedures were developed to employee access to files and offices over the summer.

Employee withholdings to the Campaign Assistance Fund are automated and continued throughout the pandemic without issue.

Unfortunately, the same cannot be said of the transferring of that data to our vendor. Boilermaker employees were unable to access this information remotely (due to privacy and security procedures) and the IBB-CAF Manager was unable to retrieve the outstanding payroll deduction data until October 6, 2020.

Upon receipt of the data covering March 2020 through October 2020, our vendor reviewed the information and reconciled the data to bank statements to ensure the accuracy prior to amending the April, May, June, July, August, September and October Monthly Reports and the Pre General Report.

These amendments were filed as soon as possible after the data was reviewed and verified.

I trust this addresses the Committee's concerns, but if there are any other questions please do not hesitate to contact me” (Image 202103049440166494).

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

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O-Index (2021-2022)															
Cmte. ID: C00005157 Cmte. Name: INTERNATIONAL BROTHERHOOD OF BOILERMAKERS CAMPAIGN ASSISTANCE FUND															
Treasurer Name: CREEDEN, WILLIAM T Address: 753 STATE AVE. SUITE 565, KANSAS CITY, KS 66101															
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			2/19/2021	1	202102199428641579				-	-	-	-	-	-	-
MS-T			2/19/2021	1	202102199428641587				-	-	-	-	-	-	-
MS-T			2/19/2021	1	202102199428641588				-	-	-	-	-	-	-
MS-T			2/19/2021	1	202102199428641589				-	-	-	-	-	-	-
MS-T			2/19/2021	1	202102199428641590				-	-	-	-	-	-	-
MS-T			3/4/2021	1	202103049440166494				-	-	-	-	-	-	-
F3XN	M2	N	2/16/2021	7	202102169427802729	1/1/2021	1/31/2021		\$345,296	\$22,976	\$10,026	\$358,246	-	-	\$0
F3XN	M3	N	3/15/2021	6	202103159440478318	2/1/2021	2/28/2021		\$358,246	\$17,967	\$0	\$376,214	-	-	\$0
Totals										\$40,944	\$10,026				

O-Index (2019-2020)															
Cmte. ID: C00005157 Cmte. Name: INTERNATIONAL BROTHERHOOD OF BOILERMAKERS CAMPAIGN ASSISTANCE FUND															
Treasurer Name: CREEDEN, WILLIAM T Address: 753 STATE AVE. SUITE 565, KANSAS CITY, KS 66101															
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
RQ2	M4	A	1/18/2021	2	202101180300101126	3/1/2020	3/31/2020	1/18/2021	-	-	-	-	-	-	-
RQ2	M8	A	1/18/2021	2	202101180300101128	7/1/2020	7/31/2020	1/18/2021	-	-	-	-	-	-	-
RQ2	M9	A	1/18/2021	2	202101180300101130	8/1/2020	8/31/2020	1/18/2021	-	-	-	-	-	-	-
RQ2	M10	A	1/18/2021	2	202101180300101132	9/1/2020	9/30/2020	1/18/2021	-	-	-	-	-	-	-
RQ2	12G	A	1/18/2021	2	202101180300101134	10/1/2020	10/14/2020	1/18/2021	-	-	-	-	-	-	-
F3XN	M2	N	2/19/2019	6	201902199145525091	1/1/2019	1/31/2019		\$146,186	\$27,069	\$449	\$172,806	-	-	\$0
F3XN	M3	N	3/20/2019	10	201903209145842733	2/1/2019	2/28/2019		\$172,806	\$19,922	\$32,000	\$160,729	-	-	\$0
F3XN	M4	N	4/15/2019	12	201904159146137800	3/1/2019	3/31/2019		\$160,729	\$28,991	\$6,000	\$183,720	-	-	\$0
F3XN	M5	N	5/13/2019	22	201905139149687053	4/1/2019	4/30/2019		\$183,720	\$35,026	\$505	\$218,242	-	-	\$0
F3XN	M6	N	6/17/2019	23	201906179150052100	5/1/2019	5/31/2019		\$218,242	\$32,475	\$12,943	\$237,774	-	-	\$0
F3XN	M7	N	7/18/2019	26	201907189151413895	6/1/2019	6/30/2019		\$237,774	\$31,799	\$28,600	\$240,973	-	-	\$0
F3XN	M8	N	8/16/2019	22	201908169162882189	7/1/2019	7/31/2019		\$240,973	\$29,635	\$5,544	\$265,064	-	-	\$0
F3XN	M9	N	9/20/2019	24	201909209163449663	8/1/2019	8/31/2019		\$265,064	\$19,797	\$22,500	\$262,361	-	-	\$0
F3XN	M10	N	10/11/2019	30	201910119163818192	9/1/2019	9/30/2019		\$262,361	\$12,270	\$53,800	\$220,832	-	-	\$0
F3XN	M11	N	11/19/2019	29	201911199165569557	10/1/2019	10/31/2019		\$220,832	\$227,340	\$20,901	\$427,271	-	-	\$0
F3XN	M12	N	12/13/2019	36	201912139166283241	11/1/2019	11/30/2019		\$427,271	\$19,189	\$27,000	\$419,461	-	-	\$0
F3XN	YE	N	1/27/2020	47	202001279167381302	12/1/2019	12/31/2019		\$419,461	\$35,273	\$71,500	\$383,234	-	-	\$0
F3XN	M2	N	2/19/2020	10	202002199186522000	1/1/2020	1/31/2020		\$383,234	\$11,358	\$3,381	\$391,211	-	-	\$0
F3XN	M3	N	3/13/2020	14	202003139203830989	2/1/2020	2/29/2020		\$391,211	\$34,124	\$41,000	\$384,335	-	-	\$0
F3XN	M4	N	4/20/2020	14	202004209220124781	3/1/2020	3/31/2020		\$384,335	\$0	\$47,000	\$337,335	-	-	\$0
F3XA	M4	A	11/25/2020	22	202011259337132799	3/1/2020	3/31/2020		\$384,335	\$16,296	\$47,035	\$353,595	-	-	\$0
F3XN	M5	N	5/20/2020	5	202005209232854866	4/1/2020	4/30/2020		\$337,335	\$0	\$0	\$337,335	-	-	\$0
F3XA	M5	A	11/25/2020	7	202011259337132821	4/1/2020	4/30/2020		\$353,595	\$3,331	\$0	\$356,927	-	-	\$0
F3XN	M6	N	6/18/2020	6	202006189239931692	5/1/2020	5/31/2020		\$337,335	\$0	\$5,000	\$332,335	-	-	\$0
F3XA	M6	A	11/25/2020	8	202011259337132828	5/1/2020	5/31/2020		\$356,927	\$418	\$5,000	\$352,345	-	-	\$0
F3XN	M7	N	7/17/2020	16	202007179250373019	6/1/2020	6/30/2020		\$332,335	\$0	\$62,500	\$269,835	-	-	\$0
F3XA	M7	A	11/25/2020	19	202011259337132836	6/1/2020	6/30/2020		\$352,345	\$433	\$62,500	\$290,279	-	-	\$0
F3XN	M8	N	8/18/2020	8	202008189261344136	7/1/2020	7/31/2020		\$269,835	\$0	\$13,317	\$256,518	-	-	\$0

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F3XA	M8	A	11/25/2020	58	202011259337132855	7/1/2020	7/31/2020		\$290,279	\$159,492	\$13,317	\$436,455	-	-	\$0
F3XN	M9	N	9/18/2020	7	202009189267241759	8/1/2020	8/31/2020		\$256,518	\$0	\$9,000	\$247,518	-	-	\$0
F3XA	M9	A	11/25/2020	10	202011259337132913	8/1/2020	8/31/2020		\$436,455	\$16,833	\$9,000	\$444,288	-	-	\$0
F3XN	M10	N	10/19/2020	7	202010199297205219	9/1/2020	9/30/2020		\$247,518	\$0	\$13,608	\$233,910	-	-	\$0
F3XA	M10	A	11/25/2020	9	202011259337132923	9/1/2020	9/30/2020		\$444,288	\$11,231	\$13,608	\$441,911	-	-	\$0
F3XN	12G	N	10/21/2020	24	202010219326742450	10/1/2020	10/14/2020		\$233,910	\$0	\$161,500	\$72,410	-	-	\$0
F3XA	12G	A	11/25/2020	25	202011259337132932	10/1/2020	10/14/2020		\$441,911	\$0	\$161,500	\$280,411	-	-	\$0
F3XN	30G	N	12/3/2020	46	202012039337594948	10/15/2020	11/23/2020		\$280,411	\$162,419	\$117,876	\$324,953	-	-	\$0
F3XN	YE	N	1/28/2021	42	202101289413587699	11/24/2020	12/31/2020		\$324,953	\$40,342	\$20,000	\$345,296	-	-	\$0
Totals										\$975,073	\$775,963				

O-Index (2017-2018)															
Cmte. ID: C00005157 Cmte. Name: INTERNATIONAL BROTHERHOOD OF BOILERMAKERS CAMPAIGN ASSISTANCE FUND															
Treasurer Name: CREEDEN, WILLIAM T Address: 753 STATE AVE. SUITE 565, KANSAS CITY, KS 66101															
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F3XN	M2	N	2/14/2017	10	201702149049346894	1/1/2017	1/31/2017		\$147,101	\$26,459	\$20,060	\$153,501	-	-	\$0
F3XN	M3	N	3/15/2017	13	201703159050832754	2/1/2017	2/28/2017		\$153,501	\$12,471	\$45,870	\$120,102	-	-	\$0
F3XN	M4	N	4/18/2017	17	201704189052304553	3/1/2017	3/31/2017		\$120,102	\$18,629	\$48,144	\$90,586	-	-	\$0
F3XN	M5	N	5/17/2017	25	201705179053899003	4/1/2017	4/30/2017		\$90,586	\$34,251	\$12,452	\$112,385	-	-	\$0
F3XN	M6	N	6/19/2017	21	201706199061005746	5/1/2017	5/31/2017		\$112,385	\$35,270	\$77	\$147,578	-	-	\$0
F3XN	M7	N	7/19/2017	34	201707199066781137	6/1/2017	6/30/2017		\$147,578	\$29,660	\$77,560	\$99,679	-	-	\$0
F3XN	M8	N	8/17/2017	25	201708179070381744	7/1/2017	7/31/2017		\$99,679	\$32,844	\$23,320	\$109,204	-	-	\$0
F3XN	M9	N	9/19/2017	25	201709199074749300	8/1/2017	8/31/2017		\$109,204	\$21,715	\$14,560	\$116,359	-	-	\$0
F3XN	M10	N	10/18/2017	33	201710189075789322	9/1/2017	9/30/2017		\$116,359	\$23,004	\$48,010	\$91,353	-	-	\$0
F3XN	M11	N	11/17/2017	26	201711179086699586	10/1/2017	10/31/2017		\$91,353	\$12,687	\$3,960	\$100,080	-	-	\$0
F3XN	M12	N	12/15/2017	79	201712159089202516	11/1/2017	11/30/2017		\$100,080	\$127,075	\$5,530	\$221,625	-	-	\$0
F3XN	YE	N	1/24/2018	42	201801249090601788	12/1/2017	12/31/2017		\$221,625	\$33,754	\$27,280	\$228,099	-	-	\$0
F3XN	M2	N	2/16/2018	11	201802169094574645	1/1/2018	1/31/2018		\$228,099	\$20,623	\$15,456	\$233,266	-	-	\$0
F3XN	M3	N	3/19/2018	21	201803199096595017	2/1/2018	2/28/2018		\$233,266	\$26,353	\$78,850	\$180,769	-	-	\$0
F3XN	M4	N	4/18/2018	41	201804189110328158	3/1/2018	3/31/2018		\$180,769	\$18,484	\$96,050	\$103,204	-	-	\$0
F3XN	M5	N	5/17/2018	17	201805179112072094	4/1/2018	4/30/2018		\$103,204	\$16,222	\$4,452	\$114,973	-	-	\$0
F3XN	M6	N	6/19/2018	35	201806199113742995	5/1/2018	5/31/2018		\$114,973	\$28,266	\$66,107	\$77,133	-	-	\$0
F3XN	M7	N	7/18/2018	24	201807189115751048	6/1/2018	6/30/2018		\$77,133	\$41,356	\$19,500	\$98,989	-	-	\$0
F3XN	M8	N	8/17/2018	25	201808179119670557	7/1/2018	7/31/2018		\$98,989	\$24,441	\$33,500	\$89,929	-	-	\$0
F3XN	M9	N	9/19/2018	26	201809199121963195	8/1/2018	8/31/2018		\$89,929	\$26,040	\$32,322	\$83,648	-	-	\$0
F3XN	M10	N	10/15/2018	37	201810159124787868	9/1/2018	9/30/2018		\$83,648	\$17,042	\$48,500	\$52,191	-	-	\$0
F3XN	12G	N	10/25/2018	95	201810259130863714	10/1/2018	10/17/2018		\$52,191	\$123,768	\$51,500	\$124,459	-	-	\$0
F3XN	30G	N	12/6/2018	26	201812069134376614	10/18/2018	11/26/2018		\$124,459	\$8,776	\$40,349	\$92,887	-	-	\$0
F3XN	YE	N	1/15/2019	57	201901159143819715	11/27/2018	12/31/2018		\$92,887	\$58,299	\$5,000	\$146,186	-	-	\$0
F1A		A	12/3/2018	7	201812039133907545				-	-	-	-	-	-	-
Totals										\$817,501	\$818,416				

**International Brotherhood of Boilermakers Campaign Assistance Fund
(C00005157)**

2020 August Monthly Report/Amended 2020 August Monthly Report

Overview of Additional Receipts

Report Line	Original 2020 August Monthly Report (Image 202008189261344138)	Amended 2020 August Monthly Report, received 11/25/2020 (Image 202011259337132857)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$0.00	\$17,312.84	\$17,312.84
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$142,180.09	\$142,180.09
		Total:	\$159,492.93