

**21L-11**

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 24, 2021

ANALYST: Jack Baisden

I. COMMITTEE: American Freedom Fund  
C00736744  
Bill Jones, Treasurer  
100 Congress Avenue  
Suite 2000  
Austin, TX 78701

II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(2)  
11 CFR § 104.4(b)(2)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)**

American Freedom Fund (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$50,000.00 to support one (1) independent expenditure disclosed on the 2020 12-Day Pre-General Report, made up to and including the 20th day before the 2020 General Election (Attachment 2).

On October 21, 2020, the Committee filed its 2020 12-Day Pre-General Report, covering the period from October 1, 2020, through October 14, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing one (1) independent expenditure totaling \$50,000.00 made in support of one (1) federal candidate (Image 202010219326753554).

On January 11, 2021, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2020 12-Day Pre-General Report. The RFAI noted that the Committee may have failed to file one (1) or more of the required 48-Hour Reports for independent expenditures disclosed in the report. A chart was included with the RFAI

RAD Referral 21L-11  
American Freedom Fund  
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identifying the independent expenditure for which a 48-Hour Report had not been filed (Images 202101110300100701-03).

On January 21, 2021, Rick Thompson, a representative of the Committee, called the Reports Analysis Division (RAD) Analyst. The Analyst advised the Committee to file the missing 48-Hour Report as soon as possible and stated the matter may be referred to another Commission office for potential further action (Attachment 3).

On January 22, 2021, the Committee filed one (1) 48-Hour Report to support one (1) independent expenditure totaling \$50,000.00, disseminated on October 14, 2020 (Image 202101229405269129).

On January 27, 2021, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the 2020 12-Day Pre-General Report, which stated, in part:

“The American Freedom Fund (FEC ID: C00736744) received a request for additional information (RFAI) regarding its 12-Day Pre-General Report covering 10/01/2020 – 10/14/2020. The request is specific to the Committee possibly missing a 48-Hour Report for Independent Expenditures. The RFAI states an expenditure was reported on Schedule E of the 12-Day Pre-General Report which should have also been reported on a 48-Hour Report. The Committee misunderstood the additional 48-Hour Report was required even with the expenditure having been reported on the 12-Day Pre-General Report within the 48-hour window. The 48-Hour Report has now been electronically filed and the Committee understands the 48-Hour Report rules and reporting responsibility. The Committee has installed procedures to ensure additional reports are not missed” (Image 202101279413430018).

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

O-Index

3/23/2021 12:14 PM

O-Index (2021-2022)															
Cmte. ID: C00736744 Cmte. Name: AMERICAN FREEDOM FUND															
Treasurer Name: JONES, BILL Address: 100 CONGRESS AVENUE SUITE 2000, AUSTIN, TX 78701															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			1/27/2021	1	202101279413430018				-	-	-	-	-	-	-
F24N	48		1/22/2021	1	202101229405269129				-	-	-	-	-	-	-
Totals										\$0	\$0				

O-Index (2019-2020)															
Cmte. ID: C00736744 Cmte. Name: AMERICAN FREEDOM FUND															
Treasurer Name: JONES, BILL Address: 100 CONGRESS AVENUE SUITE 2000, AUSTIN, TX 78701															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
RQ2	Q1	A	5/7/2020	3	202005070300070445	1/1/2020	3/31/2020	5/7/2020	-	-	-	-	-	-	-
RQ2	12G	N	1/11/2021	3	202101110300100701	10/1/2020	10/14/2020	1/11/2021	-	-	-	-	-	-	-
RQ2	30G	N	1/11/2021	2	202101110300100733	10/15/2020	11/23/2020	1/11/2021	-	-	-	-	-	-	-
F3XN	Q1	N	4/15/2020	8	202004159216785864	1/1/2020	3/31/2020		\$0	\$250,000	\$26,010	\$223,990	-	-	\$0
F3XA	Q1	A	4/17/2020	13	202004179219687044	1/1/2020	3/31/2020		\$0	\$279,750	\$126,040	\$153,710	-	-	\$0
F3XA	Q1	A	6/10/2020	14	202006109239659637	1/1/2020	3/31/2020		\$0	\$279,750	\$126,040	\$153,710	-	-	\$0
F3XN	Q2	N	7/15/2020	8	202007159244593323	4/1/2020	6/30/2020		\$153,710	\$20,000	\$32,000	\$141,710	-	-	\$0
F3XN	Q3	N	10/14/2020	8	202010149293866754	7/1/2020	9/30/2020		\$141,710	\$0	\$25,000	\$116,710	-	-	\$0
F3XN	12G	N	10/21/2020	6	202010219326753549	10/1/2020	10/14/2020		\$116,710	\$0	\$50,020	\$66,690	-	-	\$0
F3N	30G	N	12/3/2020	7	202012039337570925	10/15/2020	11/23/2020		\$66,690	\$0	\$5,000	\$61,690	-	-	\$0
F3XA	30G	A	1/26/2021	7	202101269413406698	10/15/2020	11/23/2020		\$66,690	\$0	\$5,000	\$61,690	-	-	\$0
F3XN	YE	N	1/29/2021	7	202101299413968418	11/24/2020	12/31/2020		\$61,690	\$0	\$23,750	\$37,940	-	-	\$0
F1N		N	1/29/2020	5	202001299182322566				-	-	-	-	-	-	-
Totals										\$299,750	\$266,810				

O-Index (2017-2018)															
Cmte. ID: C00736744 Cmte. Name: AMERICAN FREEDOM FUND															
Treasurer Name: JONES, BILL Address: 100 CONGRESS AVENUE SUITE 2000, AUSTIN, TX 78701															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
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No records were found for this cycle.

**American Freedom Fund (C00736744)**

2020 12-Day Pre-General Report, received October 21, 2020

48-Hour Report Not Timely Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported</b>	<b>Election</b>	<b>48-Hour Report Filed</b>
Optimus Analytics, LLC	10/14/2020	<b>\$50,000.00</b> <i>48-Hour Report Required</i>	Chip Roy	2020 General	1/22/2021