

21L-14

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 22, 2021

ANALYST: Jamie Timmie

I. COMMITTEE: League of Southeastern Credit Unions Federal
PAC (C00139600)
Brad Green, Treasurer
22 Inverness Center Parkway
Suite 200
Birmingham, AL 35242

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(4)
11 CFR § 104.3(b)

III. BACKGROUND:

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

League of Southeastern Credit Unions Federal PAC (“the Committee”) amended its 2020 October Quarterly Report to disclose additional disbursements totaling \$54,846.16, which were not disclosed on the original report (Attachment 2).

On October 15, 2020, the Committee filed the original 2020 October Quarterly Report covering the period from July 1, 2020 through September 30, 2020. The report disclosed \$20.00 in disbursements on Line 21(b) (Other Federal Operating Expenditures) and \$163.84 in disbursements on Line 29 (Other Disbursements (Including Non-Federal Donations)) of the Detailed Summary Page (Image 202010159293983940).

On December 2, 2020, the Committee filed an Amended 2020 October Quarterly Report. The Report disclosed \$20.00 on Line 21(b), \$50,000.00 on Line 22 (Transfers to Affiliated/Other Party Committees), and \$10.00 on Line 29 of the Detailed Summary Page, an increase of \$49,846.16 in total disbursements that were not disclosed in the original report (Image 202012029337450160).

On December 3, 2020, the Committee filed an additional Amended 2020 October Quarterly Report, which disclosed \$20.00 on Line 21(b), \$50,000.00 on Line 22, \$5,000.00 on Line 23 (Contributions to Federal Candidate/Committees and Other Political Committees), and \$10.00 on Line 29 of the Detailed Summary Page, an increase of \$54,846.16 in total disbursements that were not disclosed in the original report (Image 202012039338325339).

On January 5, 2021, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2020 October Quarterly Report, received December 3, 2020. The RAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2020 October Quarterly Report (Images 202101050300100025-26).

On January 27, 2021, Blake Westbrook, a representative of the Committee, called the Reports Analysis Division (RAD) Analyst regarding the RAI. Among other items, Mr. Westbrook asked how the Committee could adequately respond to the RAI. The Analyst stated that the Committee could respond by submitting an FEC Form 99 (Miscellaneous Electronic Submission) providing clarification for the public record as to why the disbursements were not reported on the original 2020 October Quarterly Report (Attachment 3).

Later that same day, Mr. Westbrook called the RAD Analyst again to get a better understanding of the amount of increase that was questioned in the RAI. The Analyst explained that the difference was calculated from the amount reported on the original to the amount reported on the amendment. Mr. Westbrook stated that the Committee would file an FEC Form 99 to explain the discrepancy for the public record (Attachment 3).

Also, on January 27, 2021, the Committee filed an FEC Form 99, which stated:

“In response to the FEC's request for more information on the Amended October Quarterly Report (07/01/2020 - 09/30/2020), the League of Southeastern Credit Unions Federal PAC offers the following response:

The 2020 October Quarterly Report was amended to include the following items that were left off the original report:

- \$50,000 transfer to our connected PAC CULAC
- \$5,000 contribution to Tommy Tuberville for Senate Campaign” (Image 202101279413445953).

On January 29, 2021, the Committee filed an Amended 2020 October Quarterly Report, which disclosed no changes in total disbursements from the previous amendment (Image 202101299417659663).

On March 1, 2021, the RAD Analyst called Mr. Westbrook to inform the Committee that the issue on their Amended October Quarterly Report may be referred to another Commission office for potential further action and advised the Committee could submit an additional FEC Form 99 to provide further clarification for the public record (Attachment 3).

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On April 8, 2021, the Committee filed an Amended 2020 October Quarterly Report. The report disclosed no changes in total disbursements from the previous amendment (Image 202104089443138089).

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

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O-Index (2021-2022)															
				Cmte. ID: C00139600		Cmte. Name: LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC									
				Treasurer Name: GREEN, BRAD MR.		Address: 22 INVERNESS CENTER PARKWAY SUITE 200, BIRMINGHAM, AL 35242									
				Cmte. Type: Q (QUALIFIED NON-PARTY)		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	202101279413445953				-	-	-	-	-	-	-
MS-T			4/8/2021	1	202104089443138366				-	-	-	-	-	-	-
F3XN	Q1	N	4/15/2021	25	202104159443581307	1/1/2021	3/31/2021		\$70,582	\$49,260	\$0	\$119,843	-	-	\$0
Totals										\$49,260	\$0				

O-Index (2019-2020)															
				Cmte. ID: C00139600		Cmte. Name: LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC									
				Treasurer Name: GREEN, BRAD MR.		Address: 22 INVERNESS CENTER PARKWAY SUITE 200, BIRMINGHAM, AL 35242									
				Cmte. Type: Q (QUALIFIED NON-PARTY)		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	Q3	N	4/12/2020	5	202004120300063412	7/1/2019	9/30/2019	4/12/2020	-	-	-	-	-	-	-
RQ2	YE	N	4/12/2020	5	202004120300063417	10/1/2019	12/31/2019	4/12/2020	-	-	-	-	-	-	-
RQ2	Q1	N	4/30/2020	2	202004300300065900	1/1/2020	3/31/2020	4/30/2020	-	-	-	-	-	-	-
RQ2	Q2	N	8/16/2020	3	202008160300082859	4/1/2020	6/30/2020	8/16/2020	-	-	-	-	-	-	-
RQ2	Q3	N	11/9/2020	7	202011090300091412	7/1/2020	9/30/2020	11/9/2020	-	-	-	-	-	-	-
RQ2	Q3	A	1/5/2021	2	202101050300100025	7/1/2020	9/30/2020	1/5/2021	-	-	-	-	-	-	-
RQ2	30G	A	3/4/2021	2	202103040300109905	10/1/2020	11/23/2020	3/4/2021	-	-	-	-	-	-	-
RQ2	YE	A	3/4/2021	4	202103040300109911	11/24/2020	12/31/2020	3/4/2021	-	-	-	-	-	-	-
F3XN	Q1	N	4/5/2019	24	201904059146011890	1/1/2019	3/31/2019		\$71,044	\$53,768	\$59,743	\$65,069	-	-	\$0
F3XN	Q2	N	7/15/2019	43	201907159150615304	4/1/2019	6/30/2019		\$65,069	\$52,562	\$1,467	\$116,164	-	-	\$0
F3XN	Q3	N	10/15/2019	40	201910159163872393	7/1/2019	9/30/2019		\$116,164	\$38,036	\$60,386	\$93,815	-	-	\$0
F3XA	Q3	A	4/27/2020	46	202004279232295463	7/1/2019	9/30/2019		\$116,186	\$38,150	\$60,386	\$93,951	-	-	\$0
F3XN	YE	N	1/30/2020	41	202001309182491183	10/1/2019	12/31/2019		\$116,164	\$33,896	\$45,590	\$104,470	-	-	\$0
F3XA	YE	A	4/27/2020	41	202004279232295509	10/1/2019	12/31/2019		\$93,951	\$33,896	\$45,590	\$82,256	-	-	\$0
F3XN	Q1	N	4/15/2020	17	202004159219254940	1/1/2020	3/31/2020		\$82,234	\$49,153	\$41,181	\$90,206	-	-	\$0
F3XA	Q1	A	4/27/2020	18	202004279232295270	1/1/2020	3/31/2020		\$82,234	\$51,818	\$41,181	\$92,871	-	-	\$0
F3XA	Q1	A	4/29/2020	18	202004299232338220	1/1/2020	3/31/2020		\$82,256	\$51,818	\$41,181	\$92,893	-	-	\$0
F3XA	Q1	A	12/2/2020	26	202012029337445011	1/1/2020	3/31/2020		\$82,256	\$51,840	\$41,191	\$92,905	-	-	\$0
F3XA	Q1	A	1/29/2021	26	202101299417654394	1/1/2020	3/31/2020		\$82,256	\$51,836	\$41,191	\$92,901	-	-	\$0
F3XN	Q2	N	7/15/2020	24	202007159245041580	4/1/2020	6/30/2020		\$92,893	\$24,932	\$3,700	\$114,125	-	-	\$0
F3XA	Q2	A	12/2/2020	36	202012029337445915	4/1/2020	6/30/2020		\$92,905	\$24,932	\$3,709	\$114,128	-	-	\$0
F3XA	Q2	A	1/29/2021	37	202101299417655638	4/1/2020	6/30/2020		\$92,905	\$24,932	\$3,709	\$114,128	-	-	\$0
F3XA	Q2	A	4/8/2021	37	202104089443138150	4/1/2020	6/30/2020		\$92,901	\$24,932	\$3,709	\$114,124	-	-	\$0
F3XN	Q3	N	10/15/2020	39	202010159293983937	7/1/2020	9/30/2020		\$114,125	\$27,552	\$183	\$141,494	-	-	\$0
F3XA	Q3	A	12/2/2020	51	202012029337450157	7/1/2020	9/30/2020		\$114,128	\$27,552	\$50,030	\$91,651	-	-	\$0
F3XA	Q3	A	12/3/2020	52	202012039338325336	7/1/2020	9/30/2020		\$114,128	\$27,552	\$55,030	\$86,651	-	-	\$0
F3XA	Q3	A	1/29/2021	52	202101299417659660	7/1/2020	9/30/2020		\$114,128	\$27,702	\$55,030	\$86,801	-	-	\$0
F3XA	Q3	A	4/8/2021	52	202104089443138086	7/1/2020	9/30/2020		\$114,124	\$27,702	\$55,030	\$86,797	-	-	\$0
F3XN	30G	N	12/3/2020	110	202012039339556785	10/1/2020	11/23/2020		\$86,651	\$36,619	\$774	\$122,497	-	-	\$0
F3XA	30G	A	1/29/2021	110	202101299417671699	10/1/2020	11/23/2020		\$86,651	\$36,970	\$774	\$122,848	-	-	\$0
F3XA	30G	A	2/4/2021	111	202102049425074036	10/1/2020	11/23/2020		\$86,651	\$36,970	\$65,774	\$57,848	-	-	\$0
F3XA	30G	A	4/8/2021	111	202104089443138241	10/1/2020	11/23/2020		\$86,797	\$36,970	\$65,774	\$57,994	-	-	\$0
F3XN	YE	N	1/29/2021	54	202101299417673487	11/24/2020	12/31/2020		\$122,994	\$13,487	\$2	\$136,478	-	-	\$0

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F3XA	YE	A	2/4/2021	54	202102049425074147	11/24/2020	12/31/2020		\$122,994	\$13,487	\$2	\$136,478	-	-	\$0
F3XA	YE	A	4/8/2021	54	202104089443138187	11/24/2020	12/31/2020		\$57,994	\$13,487	\$898	\$70,582	-	-	\$0
Totals										\$333,308	\$333,792				

O-Index (2017-2018)															
				Cmte. ID: C00139600		Cmte. Name: LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC									
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				Cmte. Type: Q (QUALIFIED NON-PARTY)		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	N	7/19/2017	2	201707190300088093	1/1/2017	3/31/2017	7/19/2017	-	-	-	-	-	-	-
RQ2	Q1	A	8/24/2017	2	201708240300092420	1/1/2017	3/31/2017	8/24/2017	-	-	-	-	-	-	-
RQ2	Q2	A	8/24/2017	2	201708240300092422	4/1/2017	6/30/2017	8/24/2017	-	-	-	-	-	-	-
RQ2	Q2	N	10/25/2018	4	201810250300022554	4/1/2018	6/30/2018	10/25/2018	-	-	-	-	-	-	-
F3XN	Q1	N	4/14/2017	27	201704149052156326	1/1/2017	3/31/2017		(\$131	\$58,721	\$14,542	\$44,047	-	-	\$0
F3XA	Q1	A	7/25/2017	28	201707259069810241	1/1/2017	3/31/2017		(\$131	\$58,721	\$14,542	\$44,047	-	-	\$0
F3XA	Q1	A	9/27/2017	28	201709279075530908	1/1/2017	3/31/2017		(\$131	\$58,721	\$14,542	\$44,047	-	-	\$0
F3XN	Q2	N	7/14/2017	64	201707149066639972	4/1/2017	6/30/2017		\$44,047	\$48,953	\$1,073	\$91,927	-	-	\$0
F3XA	Q2	A	7/25/2017	65	201707259069810603	4/1/2017	6/30/2017		\$44,047	\$48,953	\$1,073	\$91,927	-	-	\$0
F3XA	Q2	A	9/27/2017	65	201709279075530949	4/1/2017	6/30/2017		\$44,047	\$48,953	\$1,073	\$91,927	-	-	\$0
F3XN	Q3	N	10/13/2017	64	201710139075631750	7/1/2017	9/30/2017		\$91,927	\$21,340	\$40,533	\$72,733	-	-	\$0
F3XN	YE	N	1/31/2018	85	201801319091076778	10/1/2017	12/31/2017		\$72,733	\$50,764	\$70,557	\$52,941	-	-	\$0
F3XA	YE	A	4/13/2018	87	201804139108039871	10/1/2017	12/31/2017		\$72,733	\$50,764	\$71,727	\$51,771	-	-	\$0
F3XN	Q1	N	4/13/2018	19	201804139108042884	1/1/2018	3/31/2018		\$51,771	\$41,595	\$10,684	\$82,681	-	-	\$0
F3XN	Q2	N	7/13/2018	44	201807139115419273	4/1/2018	6/30/2018		\$82,681	\$55,092	\$31,157	\$106,617	-	-	\$0
F3XN	Q3	N	10/15/2018	29	201810159124894174	7/1/2018	9/30/2018		\$106,617	\$23,037	\$95,301	\$34,352	-	-	\$0
F3XN	12G	N	10/25/2018	13	201810259131059070	10/1/2018	10/17/2018		\$34,352	\$2,043	\$41	\$36,355	-	-	\$0
F3XN	30G	N	12/6/2018	26	201812069134719778	10/18/2018	11/26/2018		\$36,355	\$13,487	\$14	\$49,828	-	-	\$0
F3XN	YE	N	1/30/2019	29	201901309144181824	11/27/2018	12/31/2018		\$49,828	\$21,518	\$301	\$71,044	-	-	\$0
Totals										\$336,555	\$265,379				

League of Southeastern Credit Unions Federal PAC (C00139600)

2020 October Quarterly Report/Amended 2020 October Quarterly Report

Overview of Additional Disbursements

Report Line	Original 2020 October Quarterly Report (Image 202010159293983940)	Amended 2020 October Quarterly Report, Received 4/8/21 (Image 202104089443138089)	Variance Amount
Line 22: Transfers to Affiliated/Other Party Committees	\$0.00	\$50,000.00	\$50,000.00
Line 23: Contributions to Federal Candidate/Committees and Other Political Committees	\$0.00	\$5,000.00	\$5,000.00
Line 29: Other Disbursements (Including Non- Federal Donations)	\$163.84	\$10.00	-\$153.84
		Total:	\$54,846.16