

**21L-19**

REPORTS ANALYSIS DIVISION REFERRAL  
 TO  
 ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 26, 2021

ANALYST: Sarah Vivian

I. COMMITTEE: JewsChoose4MoreYears  
 C00756254  
 Carol Greenwald, Treasurer  
 5600 Wisconsin Ave #108  
 Chevy Chase, MD 20815

II. RELEVANT STATUTE: 52 U.S.C § 30104(g)(1)  
 11 CFR § 104.4(c)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)**

JewsChoose4MoreYears (“the Committee”) failed to timely file four (4) 24-Hour Reports totaling \$40,172.00 to support nine (9) independent expenditures disclosed on the 2020 Termination Report, made after the 20<sup>th</sup> day but more than 24 hours before the day of the 2020 General election (Attachment 2).

On October 16, 2020, the Committee filed one (1) 48-Hour Report to support ten (10) independent expenditures, totaling \$70,896.55, disseminated on September 17, 2020, September 18, 2020, September 23, 2020, and October 18, 2020 (Images 202010169296947072-76)<sup>2</sup>.

On October 27, 2020, the Committee filed a Termination Report, covering the period from October 15, 2020 through October 27, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing fifteen (15) independent expenditures totaling \$101,782.55 made in support of one (1) Federal candidate (Images 202010279336591950-57).

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<sup>2</sup> This report disclosed expenditures that were disseminated during both the 48- and 24-Hour reporting periods for the 2020 General election.

On November 8, 2020, a Request for Additional Information (RFAI) was sent to the Committee referencing the Termination Report. Among other items, the RFAI noted that the Committee may have failed to file one (1) or more of the required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying eight (8) independent expenditures, totaling \$35,461.00, for which 24-Hour Reports had not been filed (Images 202011080300091384-87).

On November 30, 2020, Carol Greenwald, the Committee's Treasurer, called the Reports Analysis Division (RAD) Analyst for assistance with filing a 24-Hour Report in response to the RFAI that was sent on the Committee's Termination Report. The Analyst assisted Ms. Greenwald and explained that the Committee would likely not be approved for termination due to the late filed 24-Hour Report. The Analyst said that they would be in touch with further details and clarified that reports would still be required until the outstanding issues are resolved, and the termination is approved (Attachment 3).

Subsequently on November 30, 2020, one (1) 24-Hour Report was filed to support eight (8) independent expenditures totaling \$37,651.00, disseminated on October 23, 2020 and October 25, 2020 (Images 202011309337203251-54).

Also, on November 30, 2020, the Committee filed an Amended Termination Report covering the period from October 15, 2020 through November 30, 2020. The report disclosed seven (7) additional expenditures on Schedule E totaling \$50,103.00, disseminated on October 18, 2020, October 21, 2020, and October 25, 2020, that were not disclosed in the original report. All of the additional expenditures had been accounted for on previously filed 24-Hour Reports (Images 202011309337203309-19).

On December 2, 2020, Ms. Greenwald called the RAD Analyst to follow-up on outstanding issues that were preventing the Committee's termination from being approved. The Analyst explained that the missing 24-Hour Reports for independent expenditures disclosed on Schedule E of the Termination Report received October 27, 2020 may be referred to another Commission office for potential further action since they were filed late (Attachment 3).

On January 6, 2021, the Committee filed an Amended Termination Report, covering the period from October 15, 2020 through November 30, 2020. The report disclosed one (1) additional expenditure on Schedule E totaling \$4,711.00, disseminated on October 20, 2020, that was not disclosed on the original report (Images 202101069394553341-48).

Also, on January 6, 2021, the Committee filed an Amended 24-Hour Report to disclose one (1) additional expenditure totaling \$4,711.00, disseminated on October 20, 2020, that was not disclosed on the original report (Images 202101069394553312-17).

On February 10, 2021, an RFAI was sent to the Committee referencing the Amended Termination Report, received January 6, 2021. The RFAI noted that the Committee may have failed to timely file one (1) or more of the required 24-Hour Reports

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JewsChoose4MoreYears  
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regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$4,711.00, for which a 24-Hour Report had not been timely filed (Images 202102100300105422-24, Attachment 2).

On February 17, 2021, Ms. Greenwald called the RAD Analyst for guidance on how to respond to the RFAI that had been sent on the Amended Termination Report, received January 6, 2021. The Analyst explained that clarification could be provided for the public record by filing an FEC Form 99 (Miscellaneous Electronic Submission). The Analyst also explained that the additional expenditure would be included in the referral to another Commission office along with the previously identified late 24-Hour Reports (Attachment 3).

On the same date, an FEC Form 99 was filed in response to the RFAI sent on February 10, 2020, stating:

“When trying to balance the checking account against the filed reports, I found that I had not reported one ad in the Harrisburg patriot. when that report was amended the accounts balanced out at zero and I closed the checking account” (Image 202102179428285186).

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

O-Index (2021-2022)															
Cmte. ID: C00756254 Cmte. Name: JEWSCHOOSE4MOREYEARS															
Treasurer Name: GREENWALD, CAROL MS Address: 5600 WISCONSIN AVE #108, CHEVY CHASE, MD 20815															
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			2/17/2021	1	202102179428285186				-	-	-	-	-	-	-
F24N	24		1/6/2021	6	202101069394553312				-	-	-	-	-	-	-
F24A	48		1/6/2021	7	202101069394553318				-	-	-	-	-	-	-
F1A		A	1/25/2021	4	202101259405398312				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$0</b>	<b>\$0</b>				

O-Index (2019-2020)															
Cmte. ID: C00756254 Cmte. Name: JEWSCHOOSE4MOREYEARS															
Treasurer Name: GREENWALD, CAROL MS Address: 5600 WISCONSIN AVE #108, CHEVY CHASE, MD 20815															
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	TER	T	11/8/2020	4	202011080300091384	10/15/2020	10/27/2020	11/8/2020	-	-	-	-	-	-	-
RQ2	TER	A	2/10/2021	3	202102100300105422	10/15/2020	11/30/2020	2/10/2021	-	-	-	-	-	-	-
RQ2	TER	A	12/17/2020	2	202012170300095900	10/15/2020	11/30/2020	12/17/2020	-	-	-	-	-	-	-
F3XN	Q3	N	10/1/2020	18	202010019284989173	7/1/2020	9/30/2020		\$0	\$44,071	\$30,491	\$13,579	-	-	\$0
F3XA	Q3	A	10/27/2020	19	202010279336591914	7/1/2020	9/30/2020		\$0	\$41,821	\$32,991	\$8,829	-	-	\$0
F3XA	Q3	A	1/6/2021	19	202101069394553285	7/1/2020	9/30/2020		\$0	\$41,821	\$32,721	\$9,099	-	-	\$0
F3XN	12G	N	10/14/2020	8	202010149285839813	10/1/2020	10/14/2020		\$13,579	\$51,707	\$7,899	\$57,387	-	-	\$0
F3XA	12G	A	10/23/2020	8	202010239336471645	10/1/2020	10/14/2020		\$11,329	\$51,857	\$7,899	\$55,287	-	-	\$0
F3XA	12G	A	1/6/2021	8	202101069394553304	10/1/2020	10/14/2020		\$9,099	\$51,857	\$7,899	\$53,057	-	-	\$0
F3XT	TER	T	10/27/2020	17	202010279336591941	10/15/2020	10/27/2020		\$52,787	\$54,550	\$102,916	\$4,420	-	-	\$0
F3XA	TER	A	11/30/2020	20	202011309337203300	10/15/2020	11/30/2020		\$52,787	\$54,550	\$153,019	(\$45,682)	-	-	\$0
F3XA	TER	A	1/6/2021	18	202101069394553331	10/15/2020	11/30/2020		\$53,057	\$54,550	\$107,627	(\$20)	-	-	\$0
F3XN	YE	N	1/6/2021	5	202101069394553349	12/1/2020	12/31/2020		(\$20)	\$0	\$0	(\$20)	-	-	\$0
F1N		N	8/26/2020	5	202008269266994101				-	-	-	-	-	-	-
F24N	48		9/17/2020	1	202009179267221493				-	-	-	-	-	-	-
F24N	48		9/18/2020	2	202009189267272859				-	-	-	-	-	-	-
F24N	48		10/16/2020	5	202010169296947072				-	-	-	-	-	-	-
F24N	48		10/21/2020	5	202010219326755986				-	-	-	-	-	-	-
F24N	24		11/30/2020	4	202011309337203251				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$202,778</b>	<b>\$251,165</b>				

O-Index (2017-2018)															
Cmte. ID: C00756254 Cmte. Name: JEWSCHOOSE4MOREYEARS															
Treasurer Name: GREENWALD, CAROL MS Address: 5600 WISCONSIN AVE #108, CHEVY CHASE, MD 20815															
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.

**JewsChoose4MoreYears (C00756254)**

Termination Reports, received 10/27/2020 and 1/6/2021

24-Hour Reports 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>24-Hour Report Filed</b>
Harrisburg Patriot	10/20/2020	<b>\$4,711.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	1/6/2021
The Charlotte Observer	10/21/2020	<b>\$2,800.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
The Raleigh News and Observer	10/21/2020	<b>\$2,800.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
SunSentinel Newspapers	10/23/2020	<b>\$7,560.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
Charlotte Observer	10/25/2020	<b>\$2,800.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
Harrisburg Patriot	10/25/2020	<b>\$4,711.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
Miami Herald	10/25/2020	<b>\$7,000.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
Raleigh News and Observer	10/25/2020	<b>\$2,800.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020
SunSentinel Newspapers	10/25/2020	<b>\$4,990.00</b> <i>24-Hour Report Required</i>	DONALD J TRUMP	2020 General	11/30/2020