

21L-23

REPORTS ANALYSIS DIVISION REFERRAL
 TO
 ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 30, 2021

ANALYST: Jamie Timmie

- I. COMMITTEE: TAKEACTION MN FEDERAL FUND
 C00738815
 Elianne Farhat, Treasurer 705 Raymond
 Avenue
 Suite 100
 Saint Paul, MN 55114
- 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)

TAKEACTION MN FEDERAL FUND (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$150,000.00 to support one (1) independent expenditure disclosed on the 2020 12-Day Pre-General Report, made any time during the calendar year up to and including the 20th day before the 2020 General Election (Attachment 2).

On October 19, 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 \$150,000.00, made in support of one (1) Federal candidate (Image 202010199297280775).

On January 5, 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 disclosing independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$150,000.00, for which a 48-Hour Report had not been filed (Images 202101050300100045-47).

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TAKEACTION MN FEDERAL FUND
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On January 29, 2021, the Committee's Designated Agent, Ms. Marcie Moravec, called the Reports Analysis Division (RAD) Analyst about the RFAI the Committee received referencing its 2020 12-Day Pre-General Report and the missing 48-Hour Report. The Analyst explained the thresholds for when a 48-Hour Report needs to be filed and explained that the Committee should file a 48-Hour Report as soon as possible. The analyst also encouraged Ms. Moravec to submit an FEC Form 99 (Miscellaneous Electronic Submission) to provide any clarifying information for the public record (Attachment 3).

On the same date, the Committee filed a 48-Hour Report to disclose one (1) independent expenditure totaling \$150,000.00 (Image 202101299413884971).

Also, on the same date, the Committee filed an Amended 2020 12-Day Pre-General Report. The report disclosed no change in Schedule E from the original report (Image 202101299413884986).

Also, on this same date, the Committee filed an FEC Form 99, which stated:

"This is in response to a letter referencing 12 Day Pre-General Report (10/01/20 - 10/14/20).

Our organization included on this report a \$150,000 disbursement to Knock Knock with a dissemination date of 10/08/20. We did not file a 48 hour report on disbursement in a timely manner. We apologize for the delay. While we were carefully tracking the rule around 24 hour reporting 20 days out from an election, we missed the rule around 48 hour reporting after a disbursement of \$10,000 or more at any time. We have now submitted this 48 hour report and amended the 12 Day Pre-General Report to reflect that.

2020 was the first year of our PAC and we have learned many best practices about reporting that we look forward to practicing in the future" (Image 202101299413884958).

On March 1 and 4, 2021, the RAD Analyst called Ms. Moravec and left a voicemail requesting a call back about the potential referable issue on the 2020 12-Day Pre-General Report (Attachment 3).

On March 5, 2021, Ms. Moravec called the RAD Analyst in response to the voicemails. The Analyst explained that because the required 48-Hour Report had not been timely filed the issue may be referred to another Commission office for potential further action. The Analyst noted that the Committee had submitted the Amended 2020 12-Day Pre-General Report, 48-Hour Report, and FEC Form 99 on January 29, 2021, but that if they wished, they could submit an additional FEC Form 99 to add clarifying information. Ms. Moravec stated they would not be submitting anything additional at this time (Attachment 3).

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

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4/30/2021 11:24 AM

O-Index (2021-2022)															
Cmte. ID: C00738815 Cmte. Name: TAKEACTION MN FEDERAL FUND															
Treasurer Name: FARHAT, ELIANNE Address: 705 RAYMOND AVENUE SUITE 100, SAINT PAUL, MN 55114															
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	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			1/29/2021	1	202101299413866567				-	-	-	-	-	-	-
MS-T			1/29/2021	1	202101299413884958				-	-	-	-	-	-	-
F24N	24		1/29/2021	2	202101299413866353				-	-	-	-	-	-	-
F24N	24		1/29/2021	1	202101299413866514				-	-	-	-	-	-	-
F24N	24		1/29/2021	3	202101299413866523				-	-	-	-	-	-	-
F24N	48		1/29/2021	1	202101299413884971				-	-	-	-	-	-	-
Totals										\$0	\$0				

O-Index (2019-2020)															
Cmte. ID: C00738815 Cmte. Name: TAKEACTION MN FEDERAL FUND															
Treasurer Name: FARHAT, ELIANNE Address: 705 RAYMOND AVENUE SUITE 100, SAINT PAUL, MN 55114															
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	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			2/21/2020	1	202002219187237425				-	-	-	-	-	-	-
MS-T			7/6/2020	1	202007069244328257				-	-	-	-	-	-	-
RQ2	24		2/26/2020	3	202002270300059791			2/26/2020	-	-	-	-	-	-	-
RQ2	Q1	A	4/30/2020	2	202004300300066886	1/1/2020	3/31/2020	4/30/2020	-	-	-	-	-	-	-
RQ2	Q1	A	6/25/2020	2	202006250300075067	1/1/2020	3/31/2020	6/25/2020	-	-	-	-	-	-	-
RQ2	12G	N	1/5/2021	3	202101050300100045	10/1/2020	10/14/2020	1/5/2021	-	-	-	-	-	-	-
RQ2	30G	N	1/18/2021	2	202101180300101349	10/15/2020	11/23/2020	1/18/2021	-	-	-	-	-	-	-
F3XN	Q1	N	2/15/2020	10	202002159186506891	1/1/2020	3/31/2020		\$55,000	\$0	\$51,289	\$3,710	-	-	\$0
F3XA	Q1	A	4/15/2020	33	202004159216735499	1/1/2020	3/31/2020		\$55,000	\$10,000	\$60,541	\$4,458	-	-	\$0
F3XA	Q1	A	5/20/2020	33	202005209232819438	1/1/2020	3/31/2020		\$0	\$65,000	\$60,541	\$4,458	-	-	\$0
F3XN	Q2	N	7/13/2020	6	202007139244494964	4/1/2020	6/30/2020		\$4,458	\$2	\$1,066	\$3,394	-	-	\$0
F3XN	Q3	N	10/15/2020	25	202010159294299034	7/1/2020	9/30/2020		\$3,394	\$233,202	\$132,417	\$104,179	-	-	\$0
F3XN	12G	N	10/19/2020	7	202010199297280769	10/1/2020	10/14/2020		\$104,179	\$50,000	\$150,000	\$4,179	-	-	\$0
F3XA	12G	A	1/29/2021	7	202101299413884980	10/1/2020	10/14/2020		\$104,179	\$50,000	\$150,000	\$4,179	-	-	\$0
F3XN	30G	N	12/3/2020	21	202012039338184650	10/15/2020	11/23/2020		\$4,179	\$265,001	\$258,508	\$10,673	-	-	\$0
F3XA	30G	A	1/29/2021	21	202101299413866583	10/15/2020	11/23/2020		\$4,179	\$265,001	\$258,508	\$10,673	-	-	\$0
F3XN	YE	N	1/29/2021	5	202101299413885006	11/24/2020	12/31/2020		\$10,673	\$3	\$19	\$10,657	-	-	\$0
F24N	24		3/3/2020	3	202003039203689620				-	-	-	-	-	-	-
F24N	24		2/29/2020	3	202002299203454433				-	-	-	-	-	-	-
F24A	24		2/28/2020	5	202002289203426942				-	-	-	-	-	-	-
F24N	24		2/28/2020	5	202002289203426948				-	-	-	-	-	-	-
F24A	24		2/28/2020	4	202002289203426961				-	-	-	-	-	-	-
F24N	24		2/28/2020	7	202002289203427001				-	-	-	-	-	-	-
F24N	24		2/24/2020	5	202002249203317658				-	-	-	-	-	-	-
F24N	24		2/21/2020	5	202002219187236643				-	-	-	-	-	-	-
F24N	24		2/26/2020	4	202002269203320560				-	-	-	-	-	-	-
F1N		N	2/14/2020	5	202002149186503770				-	-	-	-	-	-	-
F1A		A	2/14/2020	4	202002149186503787				-	-	-	-	-	-	-
F24A	24		4/21/2020	5	202004219224405734				-	-	-	-	-	-	-
F24A	24		4/21/2020	5	202004219224405739				-	-	-	-	-	-	-

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F24A	24		4/21/2020	4	202004219224405744				-	-	-	-	-	-	-
F24A	24		4/21/2020	7	202004219224405748				-	-	-	-	-	-	-
F24A	24		4/21/2020	3	202004219224405755				-	-	-	-	-	-	-
F24A	24		4/21/2020	3	202004219224405758				-	-	-	-	-	-	-
F24N	24		8/10/2020	4	202008109261290289				-	-	-	-	-	-	-
F1A		A	8/6/2020	4	202008069261264536				-	-	-	-	-	-	-
F24N	24		8/6/2020	7	202008069261267418				-	-	-	-	-	-	-
F24N	24		10/25/2020	2	202010259336529044				-	-	-	-	-	-	-
F24N	24		10/29/2020	2	202010299336668185				-	-	-	-	-	-	-
F24N	24		10/23/2020	2	202010239336505950				-	-	-	-	-	-	-
F24N	24		10/23/2020	3	202010239336505952				-	-	-	-	-	-	-
Totals										\$613,209	\$602,551				

O-Index (2017-2018)

Cmte. ID: C00738815

Cmte. Name: TAKEACTION MN FEDERAL FUND

Treasurer Name: FARHAT, ELIANNE

Address: 705 RAYMOND AVENUE SUITE 100, SAINT PAUL, MN 55114

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)

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No records were found for this cycle.

TAKEACTION MN FEDERAL FUND (C00738815)

2020 12-Day Pre-General Report, received October 19, 2021

48-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	Election	48-Hour Report Filed
Knock Knock	10/8/2020	\$150,000.00 <i>48-Hour Report Required</i>	Joseph R. Biden, Jr.	2020 General	1/29/2021