

21L-49

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: August 3, 2021

ANALYST: Nick Tarone

I. COMMITTEE:

PACRONYM

C00646877

Vernon Gair, Treasurer (11/6/20 –
Present)

Amanda Bowen (12/20/19 – 11/5/20)

Steven Mele (6/2/17 – 12/19/19)

1400 L Street, NW, #34728

Washington, DC 20005

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)

PACRONYM (“the Committee”) amended its 2020 12-Day Pre-General Report to disclose additional receipts totaling \$161,815.16, which were not disclosed on the original report (Attachment 2).

On October 22, 2020, the Committee filed the original 2020 12-Day Pre-General Report covering the period from October 1, 2020 through October 14, 2020. The report disclosed \$807,295.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals), and \$690.70 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals), of the Detailed Summary Page (Image 202010229333226416).

On November 4, 2020, the Committee filed an Amended 2020 12-Day Pre-General Report. The report disclosed no change in activity from the original report (Image 202011049336748927).

On February 19, 2021, the Committee filed an Amended 2020 12-Day Pre-General Report. The report disclosed \$968,745.00 in receipts on Line 11(a)(i) and \$1,055.86 in receipts on Line 11(a)(ii) of the Detailed Summary Page, an increase of \$161,815.16 from the original report (Image 202102199428677268) (Attachment 2).

On April 14, 2021, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2020 12-Day Pre-General Report, received February 19, 2021. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2020 12-Day Pre-General Report (Images 202104140300115715-16).

On May 18, 2021, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the Amended 2020 12-Day Pre-General Report, received February 19, 2021, which stated, in part:

“This letter is in response to the Commission's letter dated April 14, 2021 regarding PACRONYM's 12 Day Pre-General Report (10/01/2020 ? 10/14/2020). During an internal review of PACRONYM'S records, it was determined that \$161,815.16 worth of receipts were missing from PACRONYM's database. These were omitted due to data entry errors that were corrected in amending this report. We have modified our internal processes to correct these errors and prevent future errors” (Image 202105189446934718).

On May 27, 2021, the Reports Analysis Division (RAD) Analyst called Vernon Gair, the Committee's Treasurer, and stated that the substantial increase in receipts disclosed on the Amended 2020 12-Day Pre-General Report, received February 19, 2021, may be referred to another Commission office for potential further action. The Analyst informed Mr. Gair that the Committee may file an FEC Form 99 to provide additional clarifying information on the public record concerning the increase of receipts disclosed on the Amended 2020 12-Day Pre-General Report, received February 19, 2021 (Attachment 3).

On July 12 2021, Judd Brown, a Committee representative, and Mr. Gair contacted two different RAD Analysts in reference to the RFAI sent regarding the Committee's recent Termination Report. The Analysts both explained that the Committee could not terminate due to the potentially referable issue on the Amended 2020 12-Day Pre-General Report. Further, the Analysts reminded the caller to continue filing reports until the termination was approved and reminded them of the option to file an additional FEC Form 99 to provide further clarifying information (Attachment 3).

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

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O-Index (2021-2022)															
Cmte. ID: C00646877 Cmte. Name: PACRONYM															
Treasurer Name: GAIR, VERNON Address: 1400 L STREET NW #34728, WASHINGTON, DC 20005															
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			2/19/2021	1	202102199428676660				-	-	-	-	-	-	-
MS-T			5/18/2021	1	202105189446934718				-	-	-	-	-	-	-
MS-T			5/18/2021	1	202105189446934719				-	-	-	-	-	-	-
MS-M			5/18/2021	1	202105189446934942				-	-	-	-	-	-	-
MS-O			6/3/2021	2	202106030300119173				-	-	-	-	-	-	-
RQ2	TER	T	7/11/2021	2	202107110300120830	7/1/2021	7/1/2021	7/11/2021	-	-	-	-	-	-	-
F3XN	M2	N	2/19/2021	10	202102199428681077	1/1/2021	1/31/2021		\$276,192	\$5,229	\$1,015	\$280,406	\$0	-	\$0
F3XN	M3	N	3/19/2021	7	202103199441642586	2/1/2021	2/28/2021		\$280,406	\$8	\$79,029	\$201,385	-	-	\$0
F3XN	M4	N	4/19/2021	6	202104199443809548	3/1/2021	3/31/2021		\$201,385	\$8	\$4,814	\$196,579	-	-	\$0
F3XN	M5	N	5/18/2021	5	202105189446934550	4/1/2021	4/30/2021		\$196,579	\$8	\$148	\$196,438	-	-	\$0
F3XN	MY	N	7/2/2021	10	202107029450956780	5/1/2021	6/30/2021		\$196,438	\$7	\$196,443	\$2	-	-	\$0
F3XT	TER	T	7/2/2021	6	202107029450956790	7/1/2021	7/1/2021		\$2	\$0	\$2	\$0	-	-	\$0
Totals										\$5,262	\$281,454				

O-Index (2019-2020)															
Cmte. ID: C00646877 Cmte. Name: PACRONYM															
Treasurer Name: GAIR, VERNON Address: 1400 L STREET NW #34728, WASHINGTON, DC 20005															
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-M			1/22/2020	1	202001229167309998				-	-	-	-	-	-	-
MS-O			1/28/2020	2	202001280300053917				-	-	-	-	-	-	-
MS-T			6/2/2020	1	202006029239594639				-	-	-	-	-	-	-
RQ2	48		2/2/2020	3	202002020300054179			2/2/2020	-	-	-	-	-	-	-
RQ2	M3	A	4/28/2020	2	202004280300065642	2/1/2020	2/29/2020	4/28/2020	-	-	-	-	-	-	-
RQ2	M4	N	6/9/2020	2	202006090300073875	3/1/2020	3/31/2020	6/9/2020	-	-	-	-	-	-	-
RQ2	M5	N	7/9/2020	2	202007090300075850	4/1/2020	4/30/2020	7/9/2020	-	-	-	-	-	-	-
RQ2	M6	N	8/18/2020	2	202008180300083018	5/1/2020	5/31/2020	8/18/2020	-	-	-	-	-	-	-
RQ2	M9	A	2/4/2021	2	202102040300104637	8/1/2020	8/31/2020	2/4/2021	-	-	-	-	-	-	-
RQ2	M9	N	10/29/2020	2	202010290300089043	8/1/2020	8/31/2020	10/29/2020	-	-	-	-	-	-	-
RQ2	12G	A	4/14/2021	2	202104140300115715	10/1/2020	10/14/2020	4/14/2021	-	-	-	-	-	-	-
RQ2	30G	A	4/15/2021	2	202104150300115940	10/15/2020	11/23/2020	4/15/2021	-	-	-	-	-	-	-
F3XN	MY	N	7/31/2019	8	201907319161291464	1/1/2019	6/30/2019		\$116,622	\$26	\$6,636	\$110,012	-	-	\$0
F3XN	YE	N	1/22/2020	78	202001229167309999	7/1/2019	12/31/2019		\$110,012	\$7,758,320	\$91,184	\$7,777,148	-	-	\$0
F3XA	YE	A	1/31/2020	82	202001319185204437	7/1/2019	12/31/2019		\$110,012	\$7,758,320	\$91,184	\$7,777,148	\$19,348	-	\$19,348
F3XA	YE	A	9/20/2020	81	202009209275572632	7/1/2019	12/31/2019		\$110,012	\$7,768,891	\$91,184	\$7,787,719	\$19,348	-	\$19,348
F3XN	M2	N	2/20/2020	32	202002209187230547	1/1/2020	1/31/2020		\$7,777,148	\$224,968	\$439,955	\$7,562,162	\$36,299	-	\$36,299
F3XA	M2	A	9/20/2020	32	202009209275576257	1/1/2020	1/31/2020		\$7,787,719	\$225,029	\$439,955	\$7,572,793	\$36,299	-	\$36,299
F3XN	M3	N	3/20/2020	35	202003209204649940	2/1/2020	2/29/2020		\$7,562,162	\$11,914	\$684,812	\$6,889,263	\$36,299	-	\$36,299
F3XA	M3	A	4/20/2020	35	202004209224077308	2/1/2020	2/29/2020		\$7,562,162	\$11,914	\$684,812	\$6,889,263	\$36,299	-	\$36,299
F3XA	M3	A	9/20/2020	35	202009209275576327	2/1/2020	2/29/2020		\$7,572,793	\$12,181	\$684,812	\$6,900,162	\$36,299	-	\$36,299
F3XN	M4	N	4/20/2020	33	202004209224077705	3/1/2020	3/31/2020		\$6,889,263	\$1,629,828	\$1,088,873	\$7,430,217	\$37,422	-	\$37,422
F3XA	M4	A	7/14/2020	32	202007149244563413	3/1/2020	3/31/2020		\$6,889,263	\$1,629,828	\$1,088,873	\$7,430,217	\$37,422	-	\$37,422
F3XA	M4	A	9/20/2020	32	202009209275576587	3/1/2020	3/31/2020		\$6,900,162	\$1,630,205	\$1,088,873	\$7,441,494	\$37,422	-	\$37,422
F3XN	M5	N	5/20/2020	30	202005209235962135	4/1/2020	4/30/2020		\$7,430,217	\$632,013	\$2,316,834	\$5,745,396	\$54,507	-	\$54,507
F3XA	M5	A	7/30/2020	29	202007309261195893	4/1/2020	4/30/2020		\$7,430,217	\$632,013	\$2,316,834	\$5,745,396	\$54,507	-	\$54,507

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F3XA	M5	A	9/20/2020	29	202009209275576876	4/1/2020	4/30/2020		\$7,441,494	\$632,290	\$2,316,834	\$5,756,951	\$54,507	-	\$54,507
F3XN	M6	N	6/19/2020	41	202006199240019986	5/1/2020	5/31/2020		\$5,745,396	\$1,237,340	\$2,970,482	\$4,012,254	\$36,299	-	\$36,299
F3XA	M6	A	9/20/2020	44	202009209275576951	5/1/2020	5/31/2020		\$5,756,951	\$1,237,555	\$2,970,487	\$4,024,019	\$37,170	-	\$37,170
F3XN	M7	N	7/20/2020	36	202007209250424668	6/1/2020	6/30/2020		\$4,012,254	\$5,797	\$1,153,403	\$2,864,647	\$857,348	-	\$857,348
F3XA	M7	A	9/20/2020	34	202009209275577019	6/1/2020	6/30/2020		\$4,024,019	\$6,255	\$1,153,403	\$2,876,872	\$858,651	-	\$858,651
F3XN	M8	N	8/20/2020	48	202008209261562973	7/1/2020	7/31/2020		\$2,864,647	\$2,792,460	\$2,066,843	\$3,590,264	\$36,549	-	\$36,549
F3XA	M8	A	9/20/2020	49	202009209275577753	7/1/2020	7/31/2020		\$2,876,872	\$2,792,536	\$2,066,843	\$3,602,564	\$37,938	-	\$37,938
F3XN	M9	N	9/20/2020	54	202009209275581816	8/1/2020	8/31/2020		\$3,602,564	\$266,631	\$1,732,989	\$2,136,207	\$153,131	-	\$153,131
F3XA	M9	A	11/4/2020	53	202011049336748739	8/1/2020	8/31/2020		\$3,602,564	\$266,631	\$1,732,989	\$2,136,207	\$153,131	-	\$129,131
F3XA	M9	A	2/19/2021	51	202102199428676446	8/1/2020	8/31/2020		\$3,602,564	\$267,998	\$1,719,018	\$2,151,545	\$129,131	-	\$129,131
F3XN	M10	N	10/20/2020	134	202010209297970218	9/1/2020	9/30/2020		\$2,136,207	\$2,432,522	\$1,770,840	\$2,797,889	\$880,658	-	\$880,658
F3XA	M10	A	11/4/2020	133	202011049336748792	9/1/2020	9/30/2020		\$2,136,207	\$2,432,522	\$1,770,840	\$2,797,889	\$880,658	-	\$856,659
F3XA	M10	A	2/19/2021	123	202102199428677117	9/1/2020	9/30/2020		\$2,151,545	\$2,461,255	\$1,771,975	\$2,840,825	\$855,270	-	\$855,270
F3XN	12G	N	10/22/2020	77	202010229333226414	10/1/2020	10/14/2020		\$2,797,889	\$807,985	\$8,041	\$3,597,833	\$912,068	-	\$912,068
F3XA	12G	A	11/4/2020	76	202011049336748925	10/1/2020	10/14/2020		\$2,797,889	\$807,985	\$8,041	\$3,597,833	\$912,068	-	\$888,069
F3XA	12G	A	2/19/2021	77	202102199428677266	10/1/2020	10/14/2020		\$2,840,825	\$969,800	\$8,508	\$3,802,117	\$888,071	-	\$886,679
F3XN	30G	N	12/3/2020	130	202012039351817405	10/15/2020	11/23/2020		\$3,597,833	\$16,500	\$3,542,064	\$72,269	\$22,748	-	\$22,748
F3XA	30G	A	2/19/2021	142	202102199428680708	10/15/2020	11/23/2020		\$3,802,117	\$19,955	\$3,541,756	\$280,316	\$8,775	-	\$7,386
F3XN	YE	N	1/30/2021	60	202101309418344065	11/24/2020	12/31/2020		\$72,269	\$21,203	\$25,327	\$68,144	\$573	-	\$573
F3XA	YE	A	2/19/2021	61	202102199428680920	11/24/2020	12/31/2020		\$280,316	\$21,206	\$25,330	\$276,192	\$573	-	\$573
F24N	48		1/5/2020	3	202001059167020925				-	-	-	-	-	-	-
F24N	48		2/12/2020	2	202002129186499888				-	-	-	-	-	-	-
F24N	48		2/3/2020	3	202002039186347389				-	-	-	-	-	-	-
F24N	24		3/3/2020	4	202003039203741242				-	-	-	-	-	-	-
F24N	24		3/5/2020	2	202003059203749263				-	-	-	-	-	-	-
F24N	48		3/5/2020	3	202003059203754694				-	-	-	-	-	-	-
F24N	24		2/14/2020	10	202002149186505164				-	-	-	-	-	-	-
F24A	24		3/24/2020	14	202003249215853620				-	-	-	-	-	-	-
F24A	48		3/9/2020	9	202003099203797124				-	-	-	-	-	-	-
F24N	24		4/2/2020	3	202004029216579998				-	-	-	-	-	-	-
F24N	24		5/15/2020	1	202005159232715365				-	-	-	-	-	-	-
F24N	48		5/6/2020	4	202005069232369571				-	-	-	-	-	-	-
F24N	48		4/26/2020	2	202004269232294926				-	-	-	-	-	-	-
F24A	24		6/2/2020	14	202006029239594625				-	-	-	-	-	-	-
F24A	48		5/18/2020	5	202005189232794301				-	-	-	-	-	-	-
F24N	48		7/2/2020	3	202007029244275464				-	-	-	-	-	-	-
F24N	48		6/26/2020	3	202006269244219125				-	-	-	-	-	-	-
F24N	48		6/23/2020	1	202006239244174263				-	-	-	-	-	-	-
F24N	48		6/12/2020	1	202006129239776159				-	-	-	-	-	-	-
F24N	48		6/11/2020	1	202006119239688259				-	-	-	-	-	-	-
F24N	48		7/10/2020	1	202007109244427301				-	-	-	-	-	-	-
F24N	48		7/14/2020	1	202007149244572508				-	-	-	-	-	-	-
F24N	48		7/19/2020	2	202007199250404795				-	-	-	-	-	-	-
F24N	48		8/21/2020	3	202008219266862201				-	-	-	-	-	-	-
F24N	48		8/7/2020	3	202008079261283060				-	-	-	-	-	-	-
F24N	48		8/7/2020	1	202008079261283065				-	-	-	-	-	-	-
F24N	48		9/17/2020	14	202009179267236847				-	-	-	-	-	-	-
F24N	48		9/10/2020	5	202009109267131421				-	-	-	-	-	-	-
F24N	48		8/27/2020	3	202008279267044714				-	-	-	-	-	-	-
F24N	48		8/28/2020	5	202008289267057204				-	-	-	-	-	-	-

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F24N	48		9/5/2020	1	202009059267084344				-	-	-	-	-	-	-
F24N	48		9/3/2020	6	202009039267081833				-	-	-	-	-	-	-
F24N	48		10/7/2020	8	202010079285052287				-	-	-	-	-	-	-
F24N	48		10/9/2020	6	202010099285098769				-	-	-	-	-	-	-
F24N	48		10/3/2020	3	202010039285005785				-	-	-	-	-	-	-
F24N	48		9/30/2020	7	202009309284984085				-	-	-	-	-	-	-
F24N	48		9/25/2020	4	202009259284970332				-	-	-	-	-	-	-
F24N	24		10/16/2020	3	202010169296999886				-	-	-	-	-	-	-
F24N	48		10/15/2020	4	202010159294325094				-	-	-	-	-	-	-
F24N	48		10/13/2020	1	202010139285520254				-	-	-	-	-	-	-
F24N	24		10/21/2020	2	202010219326759168				-	-	-	-	-	-	-
F24N	24		10/17/2020	4	202010179297137379				-	-	-	-	-	-	-
F24N	24		10/28/2020	2	202010289336631920				-	-	-	-	-	-	-
F24N	24		10/27/2020	1	202010279336592046				-	-	-	-	-	-	-
F24N	24		10/22/2020	10	202010229333189125				-	-	-	-	-	-	-
F1A		A	11/6/2020	4	202011069336972136				-	-	-	-	-	-	-
F24N	24		11/1/2020	2	202011019336679634				-	-	-	-	-	-	-
F1A		A	10/30/2020	4	202010309336673207				-	-	-	-	-	-	-
F24N	24		10/30/2020	2	202010309336673237				-	-	-	-	-	-	-
F1A		A	12/20/2019	4	201912209166770015				-	-	-	-	-	-	-
F24N	48		12/20/2019	2	201912209166856590				-	-	-	-	-	-	-
F24N	48		12/6/2019	1	201912069166161171				-	-	-	-	-	-	-
Totals										\$18,045,188	\$17,885,619				

O-Index (2017-2018)															
Cmte. ID: C00646877 Cmte. Name: PACRONYM															
Treasurer Name: GAIR, VERNON Address: 1400 L STREET NW #34728, WASHINGTON, DC 20005															
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
F3XN	MY	N	7/31/2017	6	201707319069911068	6/1/2017	6/30/2017		\$0	\$50,000	\$0	\$50,000	-	-	\$0
F3XN	YE	N	1/31/2018	19	201801319091293405	7/1/2017	12/31/2017		\$50,000	\$9,694	\$15,246	\$44,448	-	-	\$0
F3XN	Q1	N	4/15/2018	10	201804159108198275	1/1/2018	3/31/2018		\$44,448	\$5,500	\$1,392	\$48,556	-	-	\$0
F3XN	Q2	N	7/15/2018	11	201807159115640156	4/1/2018	6/30/2018		\$48,556	\$30,000	\$4,202	\$74,353	-	-	\$0
F3XN	Q3	N	10/15/2018	12	201810159125026564	7/1/2018	9/30/2018		\$74,353	\$2,000,851	\$1,605,403	\$469,801	-	-	\$0
F3XN	12G	N	10/25/2018	10	201810259130893483	10/1/2018	10/17/2018		\$469,801	\$301,965	\$655,485	\$116,280	-	-	\$0
F3XN	30G	N	12/6/2018	14	201812069134826204	10/18/2018	11/26/2018		\$116,280	\$9,191	\$2,571	\$122,899	-	-	\$0
F3XN	YE	N	1/28/2019	7	201901289144043139	11/27/2018	12/31/2018		\$122,899	\$6	\$6,282	\$116,622	-	-	\$0
F1N		N	6/2/2017	5	201706029055299256				-	-	-	-	-	-	-
F1A		A	10/23/2017	5	201710239076663688				-	-	-	-	-	-	-
Totals										\$2,407,207	\$2,290,584				

PACRONYM (C00646877)

2020 12-Day Pre-General Report/Amended 2020 12-Day Pre-General Report

Overview of Additional Receipts

Report Line	Original 2020 12-Day Pre-General Report (Image 202010229333226416)	Amended 2020 12-Day Pre- General Report, Received 2/19/2021 (Image 202102199428677268)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$807,295.00	\$968,745.00	\$161,450.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$690.70	\$1,055.86	\$365.16
		Total:	\$161,815.16