

RAD REFERRAL #: A21-15**DATE:** July 13, 2021**ANALYST:** Romy Adame-Wilson**REPORTS ANALYSIS AUDIT REFERRAL**

I. COMMITTEE: WFP IE Committee (FKA Working Families Party National Independent Expenditure Committee)
C00626861
Mike Boland, Treasurer
77 Sands Street, 6th Floor
Brooklyn, NY 11201

TYPE OF COMMITTEE: Independent Expenditure-Only

II. REGISTRATION DATE: October 3, 2016

III. MULTICANDIDATE STATUS DATE: Non-Qualified

IV. TOTAL POINTS ASSESSED:

V. SUMMARY OF AUDIT POINTS BY STANDARD:

Standard	#	Description	Total # of Point(s)	Points for Receipts	Points for Disbursements	Other Points
Standard	4	Failure to File Reports and Late Filing	Point(s)			
Standard	6	Mathematical Discrepancies	Point(s)			
Standard	7	Failure to Provide Supporting Schedules	Point(s)			
Standard	9	Failure to Properly Itemize Contributions and Transfers from Political Committees	Point(s)			
Standard	11	Failure to Properly Itemize Disbursements	Point(s)			
Standard	14	Independent Expenditure Reporting Problems – Political Committees (Form 3X)	Point(s)			
		TOTAL	Point(s)			

VI. NOTICES SENT TO AND RESPONSES RECEIVED FROM THE COMMITTEE:

See attached O-Index for the Committee.

VII. PROBLEMS FOR WHICH AUDIT POINTS WERE ASSESSED:**A. Standard 4 - Failure to File Reports and Late Filing:**

Report Type	Due date	Date Filed	Points
2020 YE	1/31/21	2/16/21	

Standard 4 Total:

Points for Receipts	Points for Disbursements	Other Points

B. Standard 6 - Mathematical Discrepancies:

Report Type	Violation (Description)	Points
2019 MY	The beginning cash balance, \$737,972.91, was greater than the ending cash balance on the previous report, \$542,309.90, a discrepancy of \$195,663.01.	
2020 12G	<p>The Committee's report contained mathematical discrepancies totaling \$2,386,097.22, as detailed below:</p> <p>The beginning cash balance, \$2,706,642.77, was less than the ending cash balance on the previous report, \$3,899,691.38, a discrepancy of \$1,193,048.61.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$1,193,048.61.</p>	

Standard 6 Total:

Points for Receipts	Points for Disbursements	Other Points

C. Standard 7 - Failure to Provide Supporting Schedules:

Report Type	Violation (Description)	Points
2019 MY	Schedule D supporting Line 10 disclosed one (1) debt owed by the Committee with an outstanding beginning balance. However, Schedule D of the previous report disclosed no outstanding ending balance at the close of the period, resulting in a missing schedule of \$20,000.00.	

2020	Q1	<p>The Committee failed to provide a Schedule E for one (1) independent expenditure totaling \$50,000.00 disclosed on one (1) 24-Hour Report.</p> <p>The Committee failed to timely file a required 24-Hour Report for \$71,038.00 in independent expenditures disclosed on Schedule E.</p>
2020	Amended Q1, received 6/26/20	The Committee's report disclosed additional disbursements totaling \$50,000.00 on Schedule E supporting Line 24, resulting in an increase of more than over the original report.
2020	Amended Q3, received 4/14/21	The Committee's report disclosed additional disbursements totaling \$1,193,048.61 on Schedules B and E supporting Lines 21(b), 22, 23, 24, and 29, resulting in an increase of more than over the original report.
2020	12G	<p>Schedule E disclosed memo entries for two (2) independent expenditures totaling \$12,908.00, which were publicly disseminated prior to payment but were not disclosed as a debt on Schedule D.</p> <p>The Committee failed to timely file a required 48-Hour Report for \$12,908.00 in independent expenditures disclosed on Schedule E.</p>
2020	30G	<p>Schedule E disclosed memo entries for nineteen (19) independent expenditures totaling \$1,046,650.00, which were publicly disseminated prior to payment but were not disclosed as a debt on Schedule D.</p> <p>The Committee failed to timely file a required 48-Hour Report for \$50,000.00 in independent expenditures disclosed on Schedule E.</p>
2020	YE	Schedule E disclosed memo entries for six (6) independent expenditures totaling \$185,600.00, which were publicly disseminated prior to payment but were not disclosed as a debt on Schedule D.

Standard 7 Total:

Points for Receipts	Points for Disbursements	Other Points

D. Standard 9 - Failure to Properly Itemize Contributions and Transfers from Political Committees:

Report Type	Violation (Description)	Points
2020 Q3	Schedule A supporting Line 11(c) failed to disclose the address for a contribution from one (1) federal committee totaling \$20,000.00.	

Standard 9 Total:

Points for Receipts	Points for Disbursements	Other Points

E. Standard 11 – Failure to Properly Itemize Disbursements:

Report Type	Violation (Description)	Points
2019 YE	Schedule B supporting Line 21(b) failed to disclose an adequate purpose of disbursement for one (1) vendor totaling \$20,401.04.	
2020 Q2	Schedule B supporting Line 21(b) failed to disclose an adequate purpose of disbursement for thirteen (13) of twenty-three (23) vendors, or 56.5%.	

Standard 11 Total:

Points for Receipts	Points for Disbursements	Other Points

F. Standard 14 - Independent Expenditure Reporting Problems – Political Committees (Form 3X):

Report Type	Violation (Description)	Points
2020 Q3	The Committee failed to clarify one (1) independent expenditure totaling \$17,000.00 on Schedule E which was made for an election in which the candidate listed did not participate.	

Standard 14 Total:

Points for Receipts	Points for Disbursements	Other Points

VIII. MATTERS REQUIRING REFERRAL TO OGC/ADRO:

A. OGC –

Failure to Provide Supporting Schedules (Standard 7)

The Committee can be referred to the Office of General Counsel (OGC) for amending its 2020 October Quarterly Report to disclose additional disbursements totaling \$1,193,048.61.

The Committee can be referred to OGC on the 2020 30-Day Post-General Report for disclosing memo entries for independent expenditures totaling \$1,046,650.00, which were publicly disseminated prior to payment but where the Committee failed to disclose a debt on Schedule D.

The Committee can be referred to OGC on the 2020 Year-End Report for disclosing memo entries for independent expenditures totaling \$185,600.00, which were publicly disseminated prior to payment but where the Committee failed to disclose a debt on Schedule D.

B. ADRO –

None.

IX. OTHER COMMISSION ACTIONS DURING THE 2017-2018 AND 2019-2020 ELECTION CYCLES:

The Committee was referred to ADRO by the Reports Analysis Division (RAD) on February 14, 2017 for failing to timely file a required 24-Hour Report for \$44,619.51 in independent expenditures disclosed on Schedule E - closed on July 6, 2017 (ADR 820).

The Committee was transferred to ADRO from OGC on October 21, 2019 for cumulative errors during the 2017-2018 election cycle (ADR 945).

The Committee is currently the subject of one (1) open Administrative Fine matter in which the Commission found reason to believe the Committee failed to timely file the 2020 Year-End Report (AF 4198).

X. OTHER RELEVANT INFORMATION:

None.

Response Codes, Due Dates, and Receipt Dates for WFP IE Committee C00626861

Standard 4

Report	Response Code	Description	Due Date	Response Date	Points
2020 YE	N/A	Failure to Timely File Report (U4-0)	N/A	N/A	—

Standard 6

Report	Response Code	Description	Due Date	Response Date	Points
2019 MY	LAR	Cash Discrepancy (U6-11)	9/23/19	10/21/19	—
2020 12G	LAR	Cash Discrepancy (U6-11)	2/22/21	4/14/21	—
		Column B Totals Incorrect (U6-7)			

Standard 7

Report	Response Code	Description	Due Date	Response Date	Points
2019 MY	LAR	Debt(s) Not Previously Reported (U7-49)	9/23/19	10/21/19	—
2020 Q1	LAR	Independent Expenditure(s) on 24 Hour Report Not on Schedule E (U7-61)	6/10/20	6/26/20	—
		Missing 24 Hour Report for Independent Expenditures (U7-42)		6/23/20	
2020 Amended Q1, received 6/26/20	NR	Clarify Increase in Activity for Amendment Filed (U7-58)	8/12/20	N/A	
2020 Amended Q3, received 4/14/21	NR	Clarify Increase in Activity for Amendment Filed (U7-58)	6/1/21	N/A	—
2020 12G	IR	No Schedule D for MEMO Entries Disclosed on Schedule E (U7-62)	2/22/21	4/14/21	—
		Missing 48 Hour Report for Independent Expenditures (U7-43)			—
2020 30G	NR	No Schedule D for MEMO Entries Disclosed on Schedule E (U7-62)	5/17/21	N/A	—
		Missing 48 Hour Report for Independent Expenditures (U7-43)			—
2020 YE	NR	No Schedule D for MEMO Entries Disclosed on Schedule E (U7-62)	5/24/21	N/A	—

Standard 9

Report	Response Code	Description	Due Date	Response Date	Points
2020 Q3	LIR	Contributions/Transfers Received Missing Information (U9-1)	2/1/21	4/14/21	—

Standard 11

Report	Response Code	Description	Due Date	Response Date	Points
2019 YE	NR	Inadequate Purpose (U11-1)	4/9/20	N/A	—
2020 Q2	LAR	Inadequate Purpose (U11-1)	9/28/20	10/9/20	—

Standard 14

Report	Response Code	Description	Due Date	Response Date	Points
2020 Q3	LIR	IE Made for Election in which Candidate Did Not Participate (U14-1 modified)	2/1/21	4/14/21	

WFP IE Committee (C00626861)

1. List of Affiliated Committees:

None.

2. List of Pseudonyms:

None.

3. Coordinated Expenditure Report:

None.

4. List of 24/48-Hour Reports Filed:

Type	Date Filed	Image Number
24-Hour Report	2/18/2020	202002189186513617
24-Hour Report	2/21/2020	202002219193872878
24-Hour Report	3/2/2020	202003029203689303
24-Hour Report	3/3/2020	202003039203741248
48-Hour Report	5/29/2020	202005299239585774
24-Hour Report	6/5/2020	202006059239633765
24-Hour Report	6/11/2020	202006119239763777
24-Hour Report	6/17/2020	202006179239924764
24-Hour Report	6/20/2020	202006209244055310
24-Hour Report	6/20/2020	202006209244055237
Amended 24-Hour Report	6/23/2020	202006239244185610
24-Hour Report	7/22/2020	202007229260742980
Amended 24-Hour Report	7/22/2020	202007229260742996
Amended 24-Hour Report	7/24/2020	202007249260815644
48-Hour Report	7/24/2020	202007249260815653
24-Hour Report	8/4/2020	202008049261218776
24-Hour Report	8/6/2020	202008069261273266
Amended 24-Hour Report	8/6/2020	202008069261273265
48-Hour Report	10/11/2020	202010119285109526
24-Hour Report	10/20/2020	202010209312987522
24-Hour Report	10/21/2020	202010219326779003
24-Hour Report	10/24/2020	202010249336528829
24-Hour Report	10/26/2020	202010269336588840
24-Hour Report	10/27/2020	202010279336629264
24-Hour Report	10/29/2020	202010299336668960
24-Hour Report	10/31/2020	202010319336678234
24-Hour Report	11/2/2020	202011029336740685
48-Hour Report	11/13/2020	202011139336989307
48-Hour Report	11/19/2020	202011199337058205
48-Hour Report	11/23/2020	202011239337119117
48-Hour Report	11/30/2020	202011309337212066

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O-Index (2021-2022)															
Cmte. ID: C00626861 Cmte. Name: WFP IE COMMITTEE															
Treasurer Name: BOLAND, MIKE Address: 77 SANDS STREET 6TH FLOOR, BROOKLYN, NY 11201															
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	12S	N	5/21/2021	163	202105219447367155	1/1/2021	5/12/2021		\$2,879,917	\$778,964	\$2,918,432	\$740,450	\$34,115	-	\$34,115
F24N	24		1/4/2021	7	202101049394504831				-	-	-	-	-	-	-
F1A		A	3/31/2021	4	202103319442969916				-	-	-	-	-	-	-
F24N	24		5/21/2021	2	202105219447367318				-	-	-	-	-	-	-
Totals										\$778,964	\$2,918,432				

O-Index (2019-2020)															
Cmte. ID: C00626861 Cmte. Name: WFP IE COMMITTEE															
Treasurer Name: BOLAND, MIKE Address: 77 SANDS STREET 6TH FLOOR, BROOKLYN, NY 11201															
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	24		3/18/2020	3	202003180300060911			3/18/2020	-	-	-	-	-	-	-
RQ2	MY	N	8/19/2019	2	201908190300046589	1/1/2019	6/30/2019	8/19/2019	-	-	-	-	-	-	-
RQ2	YE	N	3/5/2020	2	202003050300060218	7/1/2019	12/31/2019	3/5/2020	-	-	-	-	-	-	-
RQ2	Q1	N	5/6/2020	4	202005060300070077	1/1/2020	3/31/2020	5/6/2020	-	-	-	-	-	-	-
RQ2	Q1	A	7/8/2020	2	202007080300075727	1/1/2020	3/31/2020	7/8/2020	-	-	-	-	-	-	-
RQ2	Q2	N	8/23/2020	4	202008230300084237	4/1/2020	6/30/2020	8/23/2020	-	-	-	-	-	-	-
RQ2	Q3	A	4/26/2021	2	202104260300116313	7/1/2020	9/30/2020	4/26/2021	-	-	-	-	-	-	-
RQ2	Q3	N	12/27/2020	2	202012280300099699	7/1/2020	9/30/2020	12/27/2020	-	-	-	-	-	-	-
RQ2	Q3	N	12/27/2020	2	202012280300099699	7/1/2020	9/30/2020	12/27/2020	-	-	-	-	-	-	-
RQ2	12G	N	1/18/2021	4	202101180300101312	10/1/2020	10/14/2020	1/18/2021	-	-	-	-	-	-	-
RQ2	30G	N	4/11/2021	4	202104110300115117	10/15/2020	11/23/2020	4/11/2021	-	-	-	-	-	-	-
RQ2	YE	N	4/19/2021	2	202104190300116063	11/24/2020	12/31/2020	4/19/2021	-	-	-	-	-	-	-
F3XN	MY	N	7/31/2019	33	201907319161279591	1/1/2019	6/30/2019		\$737,972	\$490,280	\$228,346	\$999,907	\$34,115	-	\$34,115
F3XN	YE	N	1/31/2020	42	202001319185101661	7/1/2019	12/31/2019		\$999,907	\$205,100	\$657,056	\$547,950	\$34,115	-	\$34,115
F3XN	Q1	N	4/15/2020	19	202004159219624015	1/1/2020	3/31/2020		\$547,950	\$568,354	\$158,856	\$957,448	\$34,115	-	\$34,115
F3XA	Q1	A	6/23/2020	21	202006239244185589	1/1/2020	3/31/2020		\$547,950	\$568,354	\$208,856	\$907,448	\$34,115	-	\$34,115
F3XA	Q1	A	6/26/2020	21	202006269244217796	1/1/2020	3/31/2020		\$547,950	\$568,354	\$208,856	\$907,448	\$34,115	-	\$34,115
F3XN	Q2	N	7/15/2020	36	202007159250310742	4/1/2020	6/30/2020		\$907,448	\$1,810,308	\$633,684	\$2,084,072	\$34,115	-	\$34,115
F3XA	Q2	A	10/9/2020	36	202010099285095711	4/1/2020	6/30/2020		\$907,448	\$1,810,308	\$633,684	\$2,084,072	\$34,115	-	\$34,115
F3XA	Q2	A	10/26/2020	36	202010269336533904	4/1/2020	6/30/2020		\$907,448	\$1,810,308	\$633,684	\$2,084,072	\$34,115	-	\$34,115
F3XN	Q3	N	10/15/2020	40	202010159296500281	7/1/2020	9/30/2020		\$2,084,072	\$1,965,885	\$150,266	\$3,899,691	\$34,115	-	\$34,115
F3XA	Q3	A	4/14/2021	63	202104149443336717	7/1/2020	9/30/2020		\$2,084,072	\$1,965,885	\$1,343,314	\$2,706,642	\$34,115	-	\$34,115
F3XN	12G	N	10/22/2020	31	202010229336453474	10/1/2020	10/14/2020		\$2,706,642	\$720,836	\$367,757	\$3,059,721	\$34,115	-	\$34,115
F3XA	12G	A	4/14/2021	32	202104149443336915	10/1/2020	10/14/2020		\$2,706,642	\$720,836	\$379,434	\$3,048,044	\$34,115	-	\$34,115
F3XN	30G	N	12/3/2020	47	202012039351819318	10/15/2020	11/23/2020		\$3,048,044	\$93,154	\$1,193,120	\$1,948,078	\$34,115	-	\$34,115
F3XN	YE	N	2/16/2021	32	202102169427803440	11/24/2020	12/31/2020		\$1,948,078	\$1,539,330	\$607,491	\$2,879,917	\$34,115	-	\$34,115
F1A		A	1/17/2020	4	202001179167234606				-	-	-	-	-	-	-
F24N	24		2/21/2020	1	202002219193872878				-	-	-	-	-	-	-
F1A		A	2/27/2020	4	202002279203325725				-	-	-	-	-	-	-
F24N	24		3/2/2020	1	202003029203689303				-	-	-	-	-	-	-
F24N	24		3/3/2020	1	202003039203741248				-	-	-	-	-	-	-
F24N	24		2/18/2020	1	202002189186513617				-	-	-	-	-	-	-
F24N	48		5/29/2020	1	202005299239585774				-	-	-	-	-	-	-
F24N	24		6/5/2020	2	202006059239633765				-	-	-	-	-	-	-

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F24N	24		6/20/2020	1	202006209244055237				-	-	-	-	-	-	-
F24N	24		6/20/2020	3	202006209244055310				-	-	-	-	-	-	-
F24A	24		6/23/2020	1	202006239244185610				-	-	-	-	-	-	-
F24N	24		6/17/2020	2	202006179239924764				-	-	-	-	-	-	-
F24N	24		6/11/2020	2	202006119239763777				-	-	-	-	-	-	-
F24N	24		8/4/2020	1	202008049261218776				-	-	-	-	-	-	-
F24A	24		8/6/2020	1	202008069261273265				-	-	-	-	-	-	-
F24N	24		8/6/2020	1	202008069261273266				-	-	-	-	-	-	-
F24N	24		7/22/2020	1	202007229260742980				-	-	-	-	-	-	-
F24A	24		7/22/2020	1	202007229260742996				-	-	-	-	-	-	-
F24A	24		7/24/2020	1	202007249260815644				-	-	-	-	-	-	-
F24N	48		7/24/2020	1	202007249260815653				-	-	-	-	-	-	-
F1A		A	9/25/2020	4	202009259284968423				-	-	-	-	-	-	-
F24N	48		10/11/2020	1	202010119285109526				-	-	-	-	-	-	-
F24N	24		10/21/2020	5	202010219326779003				-	-	-	-	-	-	-
F24N	24		10/20/2020	7	202010209312987522				-	-	-	-	-	-	-
F24N	24		10/26/2020	1	202010269336588840				-	-	-	-	-	-	-
F24N	24		10/27/2020	4	202010279336629264				-	-	-	-	-	-	-
F24N	24		10/29/2020	3	202010299336668960				-	-	-	-	-	-	-
F24N	24		10/24/2020	2	202010249336528829				-	-	-	-	-	-	-
F24N	48		11/19/2020	1	202011199337058205				-	-	-	-	-	-	-
F24N	48		11/23/2020	1	202011239337119117				-	-	-	-	-	-	-
F24N	48		11/13/2020	1	202011139336989307				-	-	-	-	-	-	-
F24N	24		11/2/2020	2	202011029336740685				-	-	-	-	-	-	-
F24N	24		10/31/2020	2	202010319336678234				-	-	-	-	-	-	-
F24N	48		11/30/2020	1	202011309337212066				-	-	-	-	-	-	-
Totals										\$7,393,251	\$5,251,306				

O-Index (2017-2018)															
Cmte. ID: C00626861 Cmte. Name: WFP IE COMMITTEE															
Treasurer Name: BOLAND, MIKE Address: 77 SANDS STREET 6TH FLOOR, BROOKLYN, NY 11201															
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			2/26/2018	1	201802269095590213				-	-	-	-	-	-	-
RQ2	24		12/19/2018	2	201812190300027111			12/19/2018	-	-	-	-	-	-	-
RQ2	Q1	N	7/23/2017	2	201707230300088206	1/1/2017	3/31/2017	7/23/2017	-	-	-	-	-	-	-
RQ2	Q1	A	10/18/2017	2	201710180300093535	1/1/2017	3/31/2017	10/18/2017	-	-	-	-	-	-	-
RQ2	MY	N	8/24/2017	2	201708240300092352	4/1/2017	6/30/2017	8/24/2017	-	-	-	-	-	-	-
RQ2	YE	N	3/12/2018	2	201803120300000830	7/1/2017	12/31/2017	3/12/2018	-	-	-	-	-	-	-
RQ2	Q1	N	6/3/2018	3	201806030300011142	1/1/2018	3/31/2018	6/3/2018	-	-	-	-	-	-	-
RQ2	Q3	A	3/5/2019	3	201903050300034692	7/1/2018	9/30/2018	3/5/2019	-	-	-	-	-	-	-
RQ2	Q3	N	11/15/2018	3	201811150300025426	7/1/2018	9/30/2018	11/15/2018	-	-	-	-	-	-	-
RQ2	12G	N	3/5/2019	2	201903050300034695	10/1/2018	10/17/2018	3/5/2019	-	-	-	-	-	-	-
RQ2	30G	N	3/6/2019	6	201903060300034761	10/18/2018	11/26/2018	3/6/2019	-	-	-	-	-	-	-
RQ2	YE	N	3/6/2019	2	201903060300034767	11/27/2018	12/31/2018	3/6/2019	-	-	-	-	-	-	-
F3XN	Q1	N	4/15/2017	17	201704159052278897	1/1/2017	3/31/2017		\$79,322	\$71,590	\$219,463	(\$68,549	\$12,743	-	\$12,743
F3XA	Q1	A	9/1/2017	17	201709019071283329	1/1/2017	3/31/2017		\$269,322	\$71,590	\$139,463	\$201,450	\$7,793	-	\$7,793
F3XN	MY	N	7/31/2017	22	201707319069914668	4/1/2017	6/30/2017		(\$68,549	\$190,765	\$157,898	(\$35,683	\$12,743	-	\$12,743
F3XA	MY	A	10/5/2017	22	201710059075578600	4/1/2017	6/30/2017		\$201,450	\$190,765	\$157,898	\$234,316	\$11,243	-	\$7,793
F3XN	YE	N	1/31/2018	20	201801319091098640	7/1/2017	12/31/2017		\$234,316	\$55,215	\$29,255	\$260,276	\$14,115	-	\$14,115

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F3XN	Q1	N	4/15/2018	13	201804159108241096	1/1/2018	3/31/2018		\$260,276	\$197,150	\$49,397	\$408,028	\$14,115	-	\$14,115
F3XA	Q1	A	7/9/2018	33	201807099115260402	1/1/2018	3/31/2018		\$260,276	\$197,150	\$49,397	\$408,028	\$14,115	-	\$14,115
F3XN	Q2	N	7/15/2018	12	201807159115704048	4/1/2018	6/30/2018		\$408,028	\$124,500	\$100,000	\$432,528	\$14,115	-	\$14,115
F3XN	Q3	N	10/15/2018	28	201810159125270867	7/1/2018	9/30/2018		\$308,028	\$359,000	\$312,091	\$354,936	\$14,115	-	\$14,115
F3XA	Q3	A	2/1/2019	52	201902019145452778	7/1/2018	9/30/2018		\$432,528	\$522,913	\$312,091	\$643,350	\$34,115	-	\$34,115
F3XN	12G	N	10/25/2018	22	201810259133333626	10/1/2018	10/17/2018		\$354,936	\$0	\$265,445	\$89,491	\$14,115	-	\$14,115
F3XN	30G	N	12/6/2018	19	201812069135374703	10/18/2018	11/26/2018		\$227,276	\$133,500	\$304,079	\$56,697	\$14,115	-	\$14,115
F3XN	YE	N	1/31/2019	29	201901319145449608	11/27/2018	12/31/2018		\$307,924	\$234,385	\$0	\$542,309	\$14,115	-	\$14,115
F3XA	YE	A	10/21/2019	43	201910219165247805	11/27/2018	12/31/2018		\$503,587	\$234,385	\$0	\$737,972	\$34,115	-	\$34,115
F24N	24		2/25/2018	1	201802259095554295				-	-	-	-	-	-	-
F1A		A	2/22/2017	4	201702229050498626				-	-	-	-	-	-	-
F24N	48		2/22/2017	1	201702229050498572				-	-	-	-	-	-	-
F24A	24		2/28/2018	2	201802289095636737				-	-	-	-	-	-	-
F24N	24		3/3/2018	1	201803039095644492				-	-	-	-	-	-	-
F24N	24		4/19/2018	1	201804199110359409				-	-	-	-	-	-	-
F24N	24		4/20/2018	1	201804209111676027				-	-	-	-	-	-	-
F24A	24		4/21/2018	1	201804219111718834				-	-	-	-	-	-	-
F24A	24		4/21/2018	1	201804219111718835				-	-	-	-	-	-	-
F1A		A	4/24/2018	4	201804249111725942				-	-	-	-	-	-	-
F24N	24		8/25/2018	2	201808259121529671				-	-	-	-	-	-	-
F24N	24		9/4/2018	1	201809049121557089				-	-	-	-	-	-	-
F24N	24		8/29/2018	2	201808299121541329				-	-	-	-	-	-	-
F24N	24		10/22/2018	1	201810229130598988				-	-	-	-	-	-	-
F24N	24		11/26/2018	1	201811269133840230				-	-	-	-	-	-	-
F24N	24		12/8/2017	1	201712089089144685				-	-	-	-	-	-	-
F24N	24		12/11/2017	1	201712119089173121				-	-	-	-	-	-	-
Totals										\$1,530,020	\$1,357,631				