

22L-09

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 25, 2022

ANALYST: Jamie Timmie

- I. COMMITTEE: America Great PAC
(C00705384)
Jason Pallante, Treasurer
1420 North St NW
Washington, DC 20005
- 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)

America Great PAC (“the Committee”) amended its 2021 Mid-Year Report to disclose additional disbursements totaling \$137,019.40, which were not disclosed in the original report (Attachment 2).

On July 27, 2021, the Committee filed the original 2021 Mid-Year Report covering the period from January 1, 2021 through June 30, 2021. The report disclosed \$0.00 on Line 21(b) (Other Federal Operating Expenditures), \$0.00 on Line 23 (Contributions to Federal Candidates/Committees and Other Political Committees), and \$0.00 on Line 29 (Other Disbursements (Including Non-Federal Donations)) of the Detailed Summary Page (Image 202107279452119023).

On October 15, 2021, the Committee filed an Amended 2021 Mid-Year Report. The report disclosed \$122,695.41 on Line 21(b), \$13,706.80 on Line 23 and \$617.19 on Line 29, a total increase of \$137,019.40 from the original report (Image 202110159467687409).

On October 24, 2021, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2021 Mid-Year Report, received October 15, 2021.

RAD Referral 22L-09
America Great PAC
Page 2 of 3

Among other items, the RFAI requested clarification regarding the substantial increase in disbursements disclosed in the Amended 2021 Mid-Year Report (Images 202110240300127346-49).

On November 22, 2021, the Reports Analysis Division (RAD) Analyst returned a call to Jason Pallante, the Committee's Treasurer. Among other items, Mr. Pallante called in response to the RFAI referencing the Amended 2021 Mid-Year Report and wanted to know the best way for the Committee to respond. The Analyst explained that the Committee could submit an FEC Form 99 (Miscellaneous Electronic Submission) response to explain the increase in disbursements on the amended report and provide additional information for the public record (Attachment 3).

On January 12, 2022, the Analyst called and left a message for Mr. Pallante informing him that the matters questioned on the Amended 2021 Mid-Year report were still outstanding and asked him to call back as soon as possible (Attachment 3).

On January 18, 2022, the Analyst called and left a message for Mr. Pallante. The Analyst explained that the outstanding matters questioned on the Amended 2021 Mid-Year report may be referred to another Commission office for potential further action and that the Committee needed to call back as soon as possible (Attachment 3).

On January 19, 2022, Mr. Pallante called and explained that he would try to resolve the outstanding matters tomorrow. The Analyst explained that the outstanding matters questioned on the Amended 2021 Mid-Year report may be referred to another Commission office for potential further action and that he needed to resolve them as soon as possible (Attachment 3).

On January 24, 2022, Mr. Pallante called and stated that he was ready to submit the amended report in response to the RFAI the Committee received on its Amended 2021 Mid-Year Report. Mr. Pallante requested a time to call the next day for assistance responding to the RFAI. The Analyst told him to call any time the next day (Attachment 3).

On January 25, 2022, Mr. Pallante called for assistance resolving the outstanding matters that were raised in the RFAI that the Committee received on its Amended 2021 Mid-Year Report. The Analyst explained that the Committee could submit an FEC Form 99 to clarify for the public record why the disbursements were not included on the original report. The Analyst also explained that the Committee should submit an amended report to correct the inadequate purposes and include the memos to the original vendors for the reimbursements. The Analyst stressed that the outstanding matters needed to be resolved as soon as possible and stated that the increase in activity would still be referred to another office at the Commission for further action (Attachment 3).

Later that same day, Mr. Pallante called to verify he was responding to the correct RFAI. The Analyst explained that it was the letter sent on October 24, 2021 referencing the Amended 2021 Mid-Year Report. Mr. Pallante stated he would file the amendment shortly (Attachment 3).

RAD Referral 22L-09
America Great PAC
Page 3 of 3

On February 10, 2022, the Committee filed an FEC Form 99 in response to the RFAI. The Committee stated, in part:

“As the PAC's Treasurer, Chief developer and digital marketer I failed to upload the expenditures on-time as per FEC requirements. I apologize for that. I will try harder next time and PRAY to find the support I need. I now better understand expenditures and they work in order to file them on-time. While I search for a FEC PAC Compliance Team, or Firm” (Image 202202109491616735).

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

| O-Index (2021-2022) | | | | | | | | | | | | | | | |
|--|--------|-----|------------|-----|--------------------|------------|------------|-------------|------------|-----------------|------------------|-----------|-------|----------|---------------|
| Cmte. ID: C00705384 Cmte. Name: AMERICA GREAT PAC | | | | | | | | | | | | | | | |
| Treasurer Name: JASON PALLANTE Address: 1420 NORTH ST NW, 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 | | | 3/17/2021 | 2 | 202103179440554325 | | | | - | - | - | - | - | - | - |
| MS-T | | | 2/10/2022 | 3 | 202202109491616734 | | | | - | - | - | - | - | - | - |
| MS-T | | | 2/23/2022 | 1 | 202202239493672816 | | | | - | - | - | - | - | - | - |
| MS-T | | | 2/23/2022 | 1 | 202202239493673499 | | | | - | - | - | - | - | - | - |
| RQ2 | MY | N | 9/16/2021 | 2 | 202109160300125960 | 1/1/2021 | 6/30/2021 | 9/16/2021 | - | - | - | - | - | - | - |
| RQ2 | MY | A | 10/24/2021 | 4 | 202110240300127346 | 1/1/2021 | 6/30/2021 | 10/24/2021 | - | - | - | - | - | - | - |
| F3XN | MY | N | 7/27/2021 | 9 | 202107279452119020 | 1/1/2021 | 6/30/2021 | | \$149,938 | \$16,991 | (\$2 | \$166,931 | - | \$16,500 | \$16,500 |
| F3XA | MY | A | 10/15/2021 | 31 | 202110159467687406 | 1/1/2021 | 6/30/2021 | | \$149,938 | \$16,991 | \$137,017 | \$29,912 | - | \$16,500 | \$16,500 |
| F3XN | YE | N | 1/31/2022 | 20 | 202201319486403936 | 7/1/2021 | 12/31/2021 | | \$16,205 | \$12,760 | \$42,183 | (\$13,217 | - | \$16,500 | \$16,500 |
| Totals | | | | | | | | | | \$29,751 | \$179,200 | | | | |

| O-Index (2019-2020) | | | | | | | | | | | | | | | |
|--|--------|-----|------------|-----|--------------------|------------|------------|-------------|------------|-----------|----------|-----------|-------|----------|---------------|
| Cmte. ID: C00705384 Cmte. Name: AMERICA GREAT PAC | | | | | | | | | | | | | | | |
| Treasurer Name: JASON PALLANTE Address: 1420 NORTH ST NW, 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 | | | 9/15/2020 | 1 | 202009159267186256 | | | | - | - | - | - | - | - | - |
| RQ7 | MY | | 8/15/2019 | 2 | 201908150300046302 | 5/7/2019 | 6/30/2019 | 8/15/2019 | - | - | - | - | - | - | - |
| RQ7 | YE | | 2/19/2020 | 2 | 202002190300057645 | 7/1/2019 | 12/31/2019 | 2/19/2020 | - | - | - | - | - | - | - |
| RQ2 | Q1 | A | 1/5/2021 | 2 | 202101050300100008 | 1/1/2020 | 3/31/2020 | 1/5/2021 | - | - | - | - | - | - | - |
| RQ2 | Q2 | A | 1/5/2021 | 3 | 202101050300100010 | 4/1/2020 | 6/30/2020 | 1/5/2021 | - | - | - | - | - | - | - |
| RQ2 | Q2 | N | 8/16/2020 | 3 | 202008160300082911 | 4/1/2020 | 6/30/2020 | 8/16/2020 | - | - | - | - | - | - | - |
| RQ2 | Q3 | A | 1/5/2021 | 3 | 202101050300100015 | 7/1/2020 | 9/30/2020 | 1/5/2021 | - | - | - | - | - | - | - |
| RQ2 | 30G | A | 3/4/2021 | 3 | 202103040300109782 | 10/1/2020 | 10/14/2020 | 3/4/2021 | - | - | - | - | - | - | - |
| RQ2 | 30G | A | 2/24/2021 | 5 | 202102240300109216 | 10/15/2020 | 11/23/2020 | 2/24/2021 | - | - | - | - | - | - | - |
| RQ7 | 30G | | 12/18/2020 | 2 | 202012180300097322 | 10/1/2020 | 11/23/2020 | 12/18/2020 | - | - | - | - | - | - | - |
| F3XN | MY | N | 3/3/2020 | 5 | 202003039203740994 | 1/1/2019 | 6/30/2019 | | \$20 | \$0 | \$0 | \$20 | - | - | \$0 |
| F3XA | YE | A | 3/3/2020 | 7 | 202003039203740975 | 7/1/2019 | 12/31/2019 | | \$20 | \$4,575 | \$0 | \$4,595 | - | - | \$0 |
| F3XN | Q1 | N | 2/11/2020 | 5 | 202002119186496253 | 1/1/2020 | 3/31/2020 | | \$4,595 | \$0 | \$0 | \$4,595 | - | - | \$0 |
| F3XN | Q1 | N | 4/13/2020 | 7 | 202004139216661220 | 1/1/2020 | 3/31/2020 | | \$4,595 | \$6,609 | \$0 | \$11,204 | - | - | \$0 |
| F3XA | Q1 | A | 11/30/2020 | 13 | 202011309337204940 | 1/1/2020 | 3/31/2020 | | \$123 | \$7,899 | \$7,653 | \$368 | - | - | \$0 |
| F3XN | Q2 | N | 7/15/2020 | 13 | 202007159250134180 | 4/1/2020 | 6/30/2020 | | \$11,204 | \$24,168 | \$0 | \$35,372 | - | - | \$0 |
| F3XA | Q2 | A | 9/21/2020 | 13 | 202009219284418963 | 4/1/2020 | 6/30/2020 | | \$11,204 | \$24,168 | \$0 | \$35,372 | - | - | \$0 |
| F3XA | Q2 | A | 11/30/2020 | 30 | 202011309337205191 | 4/1/2020 | 6/30/2020 | | \$368 | \$42,134 | \$19,180 | \$23,322 | - | \$16,500 | \$16,500 |
| F3XN | Q3 | N | 10/15/2020 | 50 | 202010159295679286 | 7/1/2020 | 9/30/2020 | | \$35,372 | \$173,006 | \$100 | \$208,278 | - | - | \$0 |
| F3XA | Q3 | A | 11/30/2020 | 68 | 202011309337205332 | 7/1/2020 | 9/30/2020 | | \$23,322 | \$126,882 | \$61,689 | \$88,514 | - | \$16,500 | \$16,500 |
| F3XA | Q3 | A | 1/30/2021 | 68 | 202101309418406203 | 7/1/2020 | 9/30/2020 | | \$23,322 | \$126,887 | \$61,689 | \$88,519 | - | \$16,500 | \$16,500 |
| F3XA | Q3 | A | 1/31/2021 | 68 | 202101319418643082 | 7/1/2020 | 9/30/2020 | | \$23,322 | \$126,887 | \$61,689 | \$88,519 | - | \$16,500 | \$16,500 |
| F3XN | 30G | N | 12/28/2020 | 23 | 202012289394390941 | 10/1/2020 | 10/14/2020 | | \$88,514 | \$120,880 | \$17,040 | \$192,354 | - | \$16,500 | \$16,500 |
| F3XA | 30G | A | 1/31/2021 | 24 | 202101319418644584 | 10/1/2020 | 10/14/2020 | | \$88,519 | \$120,880 | \$17,040 | \$192,359 | - | \$16,500 | \$16,500 |
| F3XN | 30G | N | 12/28/2020 | 47 | 202012289394390985 | 10/15/2020 | 11/23/2020 | | \$192,354 | \$67,606 | \$92,961 | \$166,999 | - | \$16,500 | \$16,500 |
| F3XA | 30G | A | 1/31/2021 | 50 | 202101319418645337 | 10/15/2020 | 11/23/2020 | | \$192,359 | \$69,793 | \$92,955 | \$169,197 | - | \$16,500 | \$16,500 |
| F3XN | YE | N | 1/31/2021 | 21 | 202101319418645497 | 11/24/2020 | 12/31/2020 | | \$169,197 | \$6,669 | \$25,928 | \$149,938 | - | \$16,500 | \$16,500 |

| | | | | | | | | | | | | | | | |
|---------------|---|----------|---|--------------------|--|--|--|--|--|------------------|------------------|---|---|---|---|
| F1 | A | 2/6/2020 | 6 | 202002060300314036 | | | | | | - | - | - | - | - | - |
| F1 | N | 5/7/2019 | 7 | 201905070300277093 | | | | | | - | - | - | - | - | - |
| Totals | | | | | | | | | | \$378,838 | \$224,448 | | | | |

| O-Index (2017-2018) | | | | | | | | | | | | | | | |
|--|--------|-----|----------|-----|------------|------------|------------|-------------|------------|--------|------|----------|-------|-------|---------------|
| Cmte. ID: C00705384 Cmte. Name: AMERICA GREAT PAC | | | | | | | | | | | | | | | |
| Treasurer Name: JASON PALLANTE Address: 1420 NORTH ST NW, 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 |

No records were found for this cycle.

America Great PAC (C00705384)

2021 Mid-Year Report/Amended 2021 Mid-Year Report

Overview of Additional Disbursements

| Report Line | Original 2021 Mid-Year Report (Image 202107279452119023) | Amended 2021 Mid-Year Report, received 10/15/21 (Image 202110159467687409) | Variance Amount |
|--|---|---|------------------------|
| Line 21(b): Other Federal Operating Expenses | \$0.00 | \$122,695.41 | \$122,695.41 |
| Line 23: Contributions to Federal Candidates and Committees | \$0.00 | \$13,706.80 | \$13,706.80 |
| Line 29: Other Disbursements (Including Non-Federal Donations) | \$0.00 | \$617.19 | \$617.19 |
| | | Total: | \$137,019.40 |