

**22L-15**

REPORTS ANALYSIS DIVISION REFERRAL  
 TO  
 ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: June 14, 2022

ANALYST: Jamie Timmie

- I. COMMITTEE: Veterans For Responsible Leadership  
 C00648808  
 Daniel Barkhuff, Treasurer  
 P.O. Box 9219  
 South Burlington, VT 05407
- 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)**

Veterans For Responsible Leadership (“the Committee”) failed to timely file six (6) 24-Hour Reports totaling \$146,390.60 to support thirty (30) independent expenditures disclosed on the 2020 30-Day Post-General Report, made after the 20<sup>th</sup> day but more than 24 hours before the day of the 2020 General Election (Attachment 1).

On December 4, 2020, the Committee filed the [2020 30-Day Post-General Report](#) covering the period from October 15, 2020, through November 23, 2020. The report included a [Schedule E \(Itemized Independent Expenditures\)](#) disclosing thirty (30) independent expenditures, totaling \$146,390.60, made in support of one (1) Federal candidate and in opposition to one (1) Federal candidate.

Also on December 4, 2020, the Committee filed one (1) [24-Hour Report](#) to support thirty (30) independent expenditures, totaling \$146,390.60, disseminated on October 15, 2020, October 19, 2020, October 22, 2020, October 26, 2020, October 28, 2020, October 29, 2020, October 30, 2020, and November 1, 2020.

On March 9, 2021, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2020 30-Day Post-General Report. The RFAI noted that the Committee may have failed to timely file one (1) or more of the required 24-Hour Reports of independent expenditures. A chart was included with the RFAI identifying thirty (30) independent expenditures, totaling \$146,390.60, for which 24-Hour Reports had not been timely filed<sup>2</sup>.

On April 14, 2021, the Committee filed an [FEC Form 99](#) (Miscellaneous Electronic Submission) in response to the RFAI referencing the 2020 30-Day Post-General Report. The Committee stated, in part:

“2. The independent expenditures referenced in the RFAI were not reported within the 24 hour window because the personnel preparing the report were not made aware of the expenditures until after the 24 hour window had expired.

Upon discovering that the costs had not been reported, the Committee immediately reported all previously undisclosed independent expenditures. The Committee is in the process of reviewing its internal procedures to ensure that all future independent expenditures are reported on times.”

On June 1, 2021, the Reports Analysis Division (RAD) logged a communication with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act. The Committee confirmed they filed an FEC Form 99 to provide additional information regarding the late 24-Hour Reports, received December 4, 2020. RAD notified the Committee that the matter would be referred to another office at the Commission for further review (Attachment 2). To date, no further communications have been received from the Committee regarding this matter.

Filings and correspondence related to the Committee can be found here: [Veterans For Responsible Leadership](#).

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<sup>2</sup> The chart attached to this RFAI included additional expenditures that were disseminated and paid for during the 2020 12-Day Pre-General reporting period, covering the period of October 1, 2020, through October 14, 2020, and which had been disclosed on the 2020 12-Day Pre-General Report.

Veterans For Responsible Leadership ( C00648808)  
[2020 30-Day Post-General Report](#)

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 / Opposed</b>	<b>Election</b>	<b>24-Hour Report Received</b>
AdQuick	10/15/2020	<b>\$4,156.00</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
AdQuick	10/15/2020	<b>\$9,403.87</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
AdQuick	10/15/2020	<b>\$10,669.91</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
Facebook Inc.	10/15/2020	<b>\$1,871.22</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Facebook Inc.	10/15/2020	<b>\$1,871.23</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
McGuire, Christopher	10/15/2020	<b>\$3,000.00</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
United States Postal Service	10/15/2020	<b>\$25.90</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
United States Postal Service	10/15/2020	<b>\$25.90</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
Veracity Media	10/15/2020	<b>\$375.00</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Veracity Media	10/15/2020	<b>\$375.00</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
Facebook Inc.	10/19/2020	<b>\$11,295.97</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Facebook Inc.	10/19/2020	<b>\$11,295.97</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported / Opposed</b>	<b>Election</b>	<b>24-Hour Report Received</b>
United States Postal Service	10/19/2020	<b>\$64.65</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
United States Postal Service	10/19/2020	<b>\$64.65</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
Deliver Strategies, LLC	10/22/2020	<b>\$47,408.06</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Facebook Inc.	10/26/2020	<b>\$10,352.31</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Facebook Inc.	10/26/2020	<b>\$10,352.31</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
Antonia, Tiffani	10/28/2020	\$200.00	TRUMP, DONALD J.	2020 General	12/4/2020
Cox, Lyndsie	10/28/2020	\$200.00	TRUMP, DONALD J.	2020 General	12/4/2020
Wesley, Jerron	10/28/2020	\$300.00	TRUMP, DONALD J.	2020 General	12/4/2020
Antonia, Tiffani	10/29/2020	\$50.00	TRUMP, DONALD J.	2020 General	12/4/2020
McGuire, Christopher	10/30/2020	<b>\$3,000.00</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Facebook Inc.	11/1/2020	<b>\$9,113.19</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Facebook Inc.	11/1/2020	<b>\$9,113.19</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
Office Depot	11/1/2020	<b>\$298.19</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH	2020 General	12/4/2020
Office Depot	11/1/2020	<b>\$298.19</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported / Opposed</b>	<b>Election</b>	<b>24-Hour Report Received</b>
Office Max	11/1/2020	<b>\$561.44</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
Office Max	11/1/2020	<b>\$561.45</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020
United States Postal Service	11/1/2020	<b>\$43.50</b> <i>24-Hour Report Required</i>	BIDEN, JOSEPH JR	2020 General	12/4/2020
United States Postal Service	11/1/2020	<b>\$43.50</b> <i>24-Hour Report Required</i>	TRUMP, DONALD J.	2020 General	12/4/2020