

RAD Referral 23L-05

FF PAC

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## REPORTS ANALYSIS DIVISION REFERRAL

TO

## ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 7, 2023

ANALYST: Kevin McQueen

I. COMMITTEE: FF PAC  
 C00669259  
 Chauncey McLean, Treasurer  
 611 Pennsylvania Ave SE Num 143  
 Washington, DC 20003

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)  
 11 C.F.R. § 104.3(a)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

FF PAC (“the Committee”) amended its 2022 July Monthly Report to disclose an in-kind receipt totaling \$193,782.79 which was not disclosed in the original report. Additionally, the Committee amended its 2022 September Monthly Report to disclose an in-kind receipt totaling \$106,458.02 which was not disclosed in the original report<sup>2</sup> (Attachment 1).

**2022 July Monthly Report**

On July 20, 2022, the Committee filed the original [2022 July Monthly Report](#) covering the period from June 1, 2022, through June 30, 2022. The report disclosed no

<sup>2</sup> Per the reporting requirement for in-kind contributions received, the Committee disclosed additional receipts totaling \$193,782.79 on Schedule A and additional disbursements to offset the in-kind receipts totaling \$193,782.79 on Schedule B, resulting in a total increase of \$193,782.79 on the Amended 2022 July Monthly Report, and disclosed additional receipts totaling \$106,458.02 on Schedule A and additional disbursements to offset the in-kind receipts totaling \$106,458.02 on Schedule B, resulting in a total increase of \$106,458.02 on the Amended 2022 September Monthly Report.

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receipts on Schedule A, Line 17 (Other Federal Receipts (Dividends, Interest, etc.)) of the [Detailed Summary Page](#).

On August 19, 2022, the Committee filed an [Amended 2022 July Monthly Report](#). The report disclosed a \$193,782.79 in-kind contribution on Line 17 of the [Detailed Summary Page](#), an increase of \$193,782.79 from the original report (Attachment 1).

On October 4, 2022, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the Amended 2022 July Monthly Report, received August 19, 2022. The RFAI requested clarification regarding the substantial increase in receipts disclosed in the Amended 2022 July Monthly Report.

On November 9, 2022, the Committee filed an [FEC Form 99](#) (Miscellaneous Electronic Submission) in response to the RFAI referencing the Amended July Monthly Report. The Committee stated, in part:

“This increase was due to an in-kind contribution received from Future Forward USA Action for the month of June. The in-kind information was not available until after the original July monthly report was due. We amended this report to include the in-kind contribution upon receiving the in-kind information.”

## **2022 September Monthly Report**

On September 20, 2022, the Committee filed the original [2022 September Monthly Report](#) covering the period from August 1, 2022, through August 31, 2022. The report disclosed \$300,280.00 in receipts on Schedule A, Line 17 of the [Detailed Summary Page](#).

On October 20, 2022, the Committee filed an [Amended 2022 September Monthly Report](#). The report disclosed \$406,738.02 in in-kind contributions on Line 17 of the [Detailed Summary Page](#), an increase of \$106,458.02 from the original report (Attachment 1).

On November 24, 2022, an [RFAI](#) was sent to the Committee referencing the Amended 2022 September Monthly Report, received October 20, 2022. The RFAI requested clarification regarding the substantial increase in receipts disclosed in the Amended 2022 September Monthly Report.

On December 29, 2022, the Committee filed an [FEC Form 99](#) in response to the RFAI referencing the Amended September Monthly Report. The Committee stated, in part:

“This increase was due to an in-kind contribution received from Future Forward USA Action for the month of August. At the time the initial version of the report was filed, the staff responsible for filing the report did not have sufficient information to include the in-kind. As soon as the information was available, we amended the report to include the in-kind contribution.”

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Since January 13, 2023, the Reports Analysis Division (RAD) logged three (3) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act. RAD was able to leave a voicemail with the Committee on two (2) of these occasions and notified Jeremy Begun, the Assistant Treasurer, that the matter would be referred to another office at the Commission for further review (Attachment 3). 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: [FF PAC](#).

**FF PAC (C00669259)**[2022 July Monthly Report](#)/[Amended 2022 July Monthly Report](#)Overview of Additional Receipts

<b>Report Line</b>	<u><a href="#">Original 2022 July Monthly Report</a></u>	<u><a href="#">Amended 2022 July Monthly Report, received 8/19/22</a></u>	<b>Variance Amount</b>
Line 17: Other Federal Receipts (Dividends, Interest, etc.)	\$0.00	\$193,782.79	\$193,782.79
<b>Total:</b>			<b>\$193,782.79</b>

[2022 September Monthly Report](#)/[Amended 2022 September Monthly Report](#)Overview of Additional Receipts

<b>Report Line</b>	<u><a href="#">Original 2022 September Monthly Report</a></u>	<u><a href="#">Amended 2022 September Monthly Report, received 10/20/22</a></u>	<b>Variance Amount</b>
Line 17: Other Federal Receipts (Dividends, Interest, etc.)	\$300,280.00	\$406,738.02	\$106,458.02
<b>Total:</b>			<b>\$106,458.02</b>