

23L-07

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 9, 2023

ANALYST: Sarah Vivian

I. COMMITTEE:

All For Our Country
C00787432
Dustin McIntyre, Treasurer
1520 Belle View Blvd
Suite 3438
Alexandria, VA 22307

II. RELEVANT STATUTE:

52 U.S.C. § 30104(g)(2)
11 C.F.R. § 104.4(b)(2)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)

All For Our Country (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$39,400.00 to support one (1) independent expenditure disclosed on the 2022 12-Day Pre-General Report, made up to and including the 20th day before the 2022 General election (Attachment 1).

On October 14, 2022, the Committee filed one (1) [24-Hour Report](#)¹ to support seven (7) independent expenditures, totaling \$388,369.40, disseminated on October 12, 2022.

On October 25, 2022, the Committee filed the [2022 12-Day Pre-General Report](#) covering the period from October 1, 2022, through October 19, 2022. The report included a [Schedule E \(Itemized Independent Expenditures\)](#) disclosing eight (8) independent expenditures, totaling \$427,769.40, made in support of two (2) federal candidates and in opposition to two (2) federal candidates.

¹ This report was labeled as a 24-Hour Report, but the expenditures disclosed were disseminated during the applicable 48-Hour Reporting period.

On November 17, 2022, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2022 12-Day Pre-General Report. The RFAI noted that the Committee may have failed to file one (1) or more of the required 48-Hour Reports of independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$39,400.00, for which a 48-Hour Report had not been filed.

On January 6, 2023, the Committee filed an [FEC Form 99](#) (Miscellaneous Electronic Submission) in response to the RFAI referencing the 2022 12-Day Pre-General Report. The Committee stated:

“An additioanl amendement to the 48hr report most recently submitted on 10/25/22 and originally submitted on 10/14/22 to include a transaction for digital advertising opposing Horsford, Steven Alexander in the General Election; House, Nevada; District 04. This transaction did appear on the committee's 12 day Pre-General Report submitted on 10/25/22.”

On the same day, the Committee filed an [Amended 24-Hour Report](#) to support eight (8) independent expenditures, totaling \$427,769.40, made in support of two (2) federal candidates and in opposition to two (2) federal candidates. The amended report included the missing expenditure addressed in the RFAI referencing the 2022 12-Day Pre-General Report.

Since January 5, 2023, the Reports Analysis Division (RAD) logged two (2) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act. RAD was able to connect with the Committee on one (1) of these occasions and notified Dustin McIntyre, Treasurer, that the Committee would be referred to another Commission office for further review. RAD advised the Committee to file the missing 48-Hour Report as well as an FEC Form 99 with any clarifying information for the public record (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: [All For Our Country](#).

All For Our Country (C00787432)[2022 12-Day Pre-General Report](#)48-Hour Report Not Timely Filed²

Name of Payee	Date of Dissemination	Expenditure Amount	Candidate Opposed	Election	24/48-Hour Report Filed
Majority Strategies LLC	10/12/2022	\$39,400.00 <i>48-Hour Report Required</i>	HORSFORD, STEVEN ALEXZANDER	2022 General	1/6/2023

² This report was labeled as a 24-Hour Report, but the expenditures disclosed were disseminated during the applicable 48-Hour Reporting period.