

23L-13

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 12, 2023

ANALYST: R. Bradley Austin

- I. COMMITTEE: Friends of Jim Clyburn  
C00255562  
James Bennett, Treasurer  
Post Office Box 12567  
Columbia, SC 29211
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(4)  
11 C.F.R. § 104.3(b)

III. BACKGROUND:

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

Friends of Jim Clyburn (“the Committee”) failed to disclose all financial activity on its 2022 12-Day Pre-General Report. On December 29, 2022, the Committee filed an Amended 2022 12-Day Pre-General Report which disclosed additional disbursements of \$62,102.29 which were not disclosed in the original report (Attachment 1).

On October 27, 2022, the Committee filed the original [2022 12-Day Pre-General Report](#) covering the period from October 1, 2022 through October 19, 2022. The report disclosed disbursements of \$17,039.02 on Line 17 (Operating Expenditures) and \$135,000.00 on Line 21 (Other Disbursements) of the Detailed Summary Page (Attachment 1).

On December 29, 2022, the Committee filed an [Amended 2022 12-Day Pre-General Report](#). The report disclosed disbursements of \$24,141.31 on Line 17 and \$190,000.00 on Line 21 of the Detailed Summary Page, a total increase of \$62,102.29 from the original report (Attachment 1).

On January 4, 2023, a [Request for Additional Information](#) (RAI) was sent to the Committee referencing the Amended 2022 12-Day Pre-General Report, received

December 29, 2022. The RFAI requested clarification regarding a significant increase in disbursements from those disclosed in the original report.

On March 1, 2023, the Committee filed an [FEC Form 99](#) (Miscellaneous Electronic Submission) in response to the RFAI referencing the Amended 2022 12-Day Pre-General Report, received December 29, 2022. The Committee stated:

“In September 2022, the Committee’s FEC Compliance Consultant, Whitney Wyatt Burns, became seriously ill. Ms. Burns was in and out of the hospital and assisted living facilities in September, October and November. On December 9, 2022, Ms. Burns passed away. This caused a serious disruption to the Committee’s FEC reporting system...

The Committee’s staff also found several disbursements that had not been entered into the database and included in the original report, notably a \$55,000.00 transfer to the Democratic Congressional Campaign Committee on the Committee’s American Express Card, \$5,287.91 in miscellaneous expenses charged to the Committee’s American Express card, and \$870.74 in credit card processing fees paid to ActBlue Technical Services. These were also added to the amended report.”

Since February 23, 2023, the Reports Analysis Division (RAD) logged five (5) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act regarding the matter referenced above. RAD notified Randall Broz, Compliance Specialist, that the Committee would be referred to another Commission office for further review. RAD advised the Committee to file 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: [Friends of Jim Clyburn](#).

**Friends of Jim Clyburn (C00255562)**

[2022 12-Day Pre-General Report/Amended 12-Day Pre-General Report received 12/29/2022](#)

Overview of Additional Disbursements

<b>Report Line</b>	<b>Original 2022 12-Day Pre- General Report</b>	<b>Amended 2022 12-Day Pre-General Report, received 12/29/2022</b>	<b>Variance Amount</b>
Line 17: Operating Expenditures	\$17,039.02	\$24,141.31	\$7,102.29
Line 21: Other Disbursements	\$135,000.00	\$190,000.00	\$55,000.00
		<b>Total:</b>	<b>\$62,102.29</b>