

RAD Referral 23L-32

Farm PAC

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REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: June 27, 2023

ANALYST: Abigail Capps

I. COMMITTEE:

Farm PAC
C00532416
Scott Piggott, Treasurer
7373 W. Saginaw Hwy.
Lansing, MI 48917

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)

Farm PAC (“the Committee”) failed to disclose all financial activity on its 2022 30-Day Post-General Report filed on December 11, 2022. On January 4, 2023, the Committee filed an Amended 2022 30-Day Post-General Report which disclosed \$125,759.20 in additional disbursements which were not disclosed in the original report. (Attachment 1).

On December 11, 2022, the Committee filed the original [2022 30-Day Post-General Report](#) covering the period from October 20, 2022 through November 28, 2022. The report disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the [Detailed Summary Page](#).

On December 22, 2022, a [Non-Filer Notice \(RQ-7\)](#) was sent to the Committee referencing the 2022 30-Day Post-General Report. The RQ-7 noted that the Committee may have failed to file a report covering the entire reporting period and requested that the Committee file this report to include the coverage dates of October 1, 2022 through October 19, 2022, immediately.

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On January 4, 2023 the Committee filed an [Amended 2022 30-Day Post-General Report](#) covering the entire required coverage period from October 1, 2022 through November 28, 2022. The report disclosed \$125,759.20 on Line 29 of the [Detailed Summary Page](#), a total increase of \$125,759.20 from the original report (Attachment 1).

On April 3, 2023, an [RFAI](#) was sent to the Committee referencing the Amended 2022 30-Day Post-General Report, received January 4, 2023. The RFAI requested clarification regarding the substantial increase in disbursements disclosed in the Amended 2022 30-Day Post-General Report.

On April 5, 2023, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#)¹ in response to the RFAI referencing the Amended 2022 30-Day Post-General Report. The Committee stated:

“Providing more information in response to correspondence I received from the Federal Elections Commission. I inadvertently missed the 12 day pre-general report. Once I was contacted by the FEC on the omission I corrected the matter immediately.”

Since December 12, 2022, 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. RAD was able to connect with the Committee on two (2) of these occasions and notified Matthew Kapp, a Committee Representative, that the matter could be referred to another Commission office for further action. RAD advised the Committee to file an FEC Form 99 with any additional 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:
[Farm PAC](#).

¹ Per the [filing requirements for quarterly filing PACs](#) in an election year, the Committee was not required to file the 2022 12-Day Pre-General Report. However, the Committee was required to file a 2022 30-Day Post-General Report covering October 1, 2022 through November 28, 2022.

Farm PAC (C00532416)[2022 30-Day Post-General Report /Amended 2022 30-Day Post-General Report](#)Overview of Additional Disbursements

Report Line	<u>Original 2022 30-Day Post-General Report</u>	<u>Amended 2022 30-Day Post-General Report, received 1/4/2023</u>	Variance Amount
Line 29: Other Disbursements	\$0.00	\$125,759.20	\$125,759.20
Total:			\$125,759.20