

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 28, 2023

ANALYST: Jamie Curran

I. COMMITTEE: Make America Great Again, Again! Inc.
C00790477
Charles Gantt, Treasurer
c/o Bulldog Compliance
138 Conant Street Ste 401
Beverly, MA 01915

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)

Make America Great Again, Again! Inc. (“the Committee”) failed to disclose all financial activity on its 2022 April Quarterly Report. On July 31, 2023, the Committee filed an Amended 2022 April Quarterly Report to disclose in-kind receipts totaling \$150,600.31, which were not disclosed in the original report² (Attachment 1).

On April 15, 2022, the Committee filed the original [2022 April Quarterly Report](#) covering the period from January 1, 2022 through March 31, 2022. The report disclosed \$4,331,550.00 in receipts on Line 11(a)(i) (Itemized Individual Contributions) of the [Detailed Summary Page](#).

² Per the reporting requirements for in-kind contributions received, the Committee disclosed additional receipts totaling \$150,600.31 on Schedule A and additional disbursements to offset the in-kind receipts totaling \$150,600.31 on Schedule B, resulting in a total increase of \$150,600.31 on the Amended 2022 April Quarterly Report.

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On July 31, 2023, the Committee filed an [Amended 2022 April Quarterly Report](#). The Report disclosed a \$4,482,150.31 in receipts on Line 11(a)(i) of the [Detailed Summary Page](#), resulting in a total increase of in-kind contributions received of \$150,600.31 from the original report (Attachment 1).

On September 4, 2023, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the Amended 2022 April Quarterly Report, received July 31, 2023. The RFAI requested clarification regarding the substantial increase in in-kind contributions disclosed in the Amended 2022 April Quarterly Report.³

On October 10, 2023, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the Amended 2022 April Quarterly Report. The Committee stated, in part:

“While conducting a review and audit of the Committee's financial activity, as part of its internal compliance policies, the Committee became aware of certain unreported in-kind contributions dating back to the first quarter of 2022. Upon discovery, the Committee undertook on its own volition the lengthy and expensive process of identifying all unreported in-kind transactions so that they could be properly disclosed. The increase in disbursements--that is, the expense offsets of in-kind contributions--flagged in this RFAI is a result of those efforts. The Committee reviewed communications and schedules of past and present Committee employees and contractors, identified, and corresponded with donors to obtain their information and calculated the value of all missed in-kind contributions. After the process was completed, the Committee determined that it was necessary to file a number of amended quarterly/monthly reports and did so.

As mentioned, these amendments were not triggered by any media or Commission inquiry and were instead self-reported as a result of the Committee's own internal policies. The Committee takes its compliance responsibilities seriously and has instituted new safeguards to ensure that all future contributions are timely and accurately communicated to the Committee's compliance team to be included on the Committee's reports.”

Since October 11, 2023, the Reports Analysis Division (RAD) logged one (1) communication with Charles Gantt, Treasurer of the Committee, which reflects efforts to help the Committee voluntarily comply with the Act. RAD was able to connect with Mr. Gantt and notified him that the matter would be referred to another Commission office 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: [Make America Great Again, Again! Inc.](#)

³ The RFAI inadvertently referenced the \$150,600.31 increase in disbursements that offset the newly disclosed in-kind contributions received.

Make America Great Again, Again! Inc.[2022 April Quarterly Report/Amended 2022 April Quarterly Report](#)Overview of Additional Receipts

Report Line	<u>Original 2022 April Quarterly Report</u>	<u>Amended 2022 April Quarterly Report, received 7/31/23</u>	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$4,331,550.00	\$4,482,150.31	\$150,600.31
		Total:	\$150,600.31