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Coalition for Fantasy Sports PAC
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REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: July 16, 2024

ANALYST: Michael A. Williamson

I. COMMITTEE: Coalition for Fantasy Sports PAC
C00845131
Kayla Lott, Treasurer
1501 Wilson Boulevard, Suite 1050
Arlington, VA 22209

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)
52 U.S.C. § 30104(b)(4)
11 C.F.R. §104.3(a)
11 C.F.R. §104.3(b)

III. BACKGROUND:

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

Coalition for Fantasy Sports PAC (“the Committee”) failed to disclose all financial activity on its 2023 Year-End Report filed on January 25, 2024. On March 21, 2024, the Committee filed an Amended 2023 Year-End Report which disclosed \$112,500.00 in additional receipts and \$26,400.00 in additional disbursements which were not disclosed in the original report (Attachment 1).

On January 25, 2024, the Committee filed the original [2023 Year-End Report](#) covering the period from July 1, 2023, through December 31, 2023. The report disclosed \$25,000.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals), \$0.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals), and \$0.00 in receipts on Line 17 (Other Federal Receipts) of the [Detailed Summary Page](#). Additionally, the report disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the [Detailed Summary Page](#) (Attachment 1).

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On March 5, 2024, the Committee filed an [Amended 2023 Year-End Report](#).¹ The report disclosed \$0.00 in receipts on Line 11(a)(i), \$0.00 in receipts on Line 11(a)(ii), and \$25,000.00 in receipts on Line 17 of the [Detailed Summary Page](#). Additionally, the report disclosed \$0.00 in disbursements on Line 29 of the [Detailed Summary Page](#) (Attachment 1).

On March 21, 2024, the Committee filed an [Amended 2023 Year-End Report](#). The report disclosed \$2,100.00 in receipts on Line 11(a)(i), \$50.00 in receipts on Line 11(a)(ii) and \$135,350.00 in receipts on Line 17 of the [Detailed Summary Page](#), a total increase of \$112,500.00. Additionally, the report disclosed \$26,400.00 in disbursements on Line 29 of the [Detailed Summary Page](#), a total increase of \$26,400.00 (Attachment 1). [Memo text](#) was attached to the report stating, “AMENDMENT TO INCLUDE MONETARY INFLOW, MISCELLANEOUS INCREASES, AND NON-FEDERAL DISBURSEMENTS NOT PREVIOUSLY REPORTED.”

On April 8, 2024, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the Amended 2023 Year-End Report, received March 21, 2024. The RFAI requested clarification regarding the substantial increase in receipts and disbursements disclosed on the Amended 2023 Year-End Report.

On April 25, 2024, the Committee filed an [Amended 2023 Year-End Report](#) that disclosed no change to the amount of receipt or disbursements and submitted an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the Amended 2023 Year-End Report, received March 21, 2024. The Committee Stated, in part:

“The Committees March 21, 2024, amended report reflects an increase in receipts totaling \$112,500 and disbursements totaling \$26,400 from the amounts disclosed in the original report for two reasons. First, the compliance officers did not have access to view the committees bank accounts. Second, the Committee did not initially establish internal controls for monetary inflows, miscellaneous increases, or non-federal disbursements. Upon discovery, the missed transactions were immediately filed.

Moreover, since discovering these transactions, the Committee devised and implemented internal procedures to monitor and review inflows and miscellaneous increases, and to pre-clear disbursements. Further, the Committee has retained a reliable compliance firm and given them permission to view the Committees bank accounts to ensure the correct filing of these reports going forward. The Committee and its officers did not intend to conceal or mislead the Federal Election Commission or the public regarding their activities.”

¹ The Committee, a Hybrid PAC that maintains a non-contribution account, filed the [Amended 2023 Year-End Report on March 5, 2024](#) to address receipts that were originally reported on Line 11(a)(i). The committee addressed the issue by moving this activity to Line 17 and disclosing the contributions were intended for the Non-Contributor Account. No increase in activity occurred between the [original 2023 Year-End Report](#) and the Amended 2023 Year-End Report, received March 5, 2024.

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Since April 25, 2024, the Reports Analysis Division (RAD) logged five (5) communications with a representative of the Committee which reflects efforts to help the Committee voluntarily comply with the Act in response to the matters referenced above. RAD was able to connect with the Committee on three (3) of these occasions and notified Sarah Boyd, a representative of the Committee, 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: [Coalition for Fantasy Sports PAC](#).

Coalition for Fantasy Sports PAC (C00845131)
[2023 Year-End Report](#) / [Amended 2023 Year-End Report](#)

Overview of Additional Receipts and Disbursements

Report Line	<u>Original 2023 Year-End Report</u>	<u>Amended 2023 Year-End Report, Received 3/21/2024</u>	Variance Amount
Receipts			
Line 11(a)(i): Itemized Individual Contributions	\$25,000.00	\$2,100.00	-\$22,900.00
Line 11(a)(ii): Unitemized Individual Contributions	\$0.00	\$50.00	\$50.00
Line 17: Other Federal Receipts	\$0.00	\$135,350.00	\$135,350.00
		Total:	\$112,500.00
Disbursements			
Line 29: Other Disbursements	\$0.00	\$26,400.00	\$26,400.00
		Total:	\$26,400.00

² On March 5, 2024, the Committee filed an [Amended 2023 Year-End Report](#) to address receipts intended for their non-contribution account that had originally been reported on Line 11(a)(i). The \$25,000.00 in receipts disclosed on Line 11(a)(i) on the original 2023 Year-End Report were moved to Line 17 on the Amended 2023 Year-End Report. The \$25,000.00 disclosed on the original report is not included in the total violation amount.