



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

MEMORANDUM

July 29, 2024

TO: The Commission

THROUGH: Alec Palmer *DCB* for AP
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Director, ADR Office

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Informational Memo on Assignment
ADR 1174 - Coalition for Fantasy Sports PAC and
Kayla Lott, Treasurer (C00845131)

The Reports Analysis Division (RAD) referred RAD 24L-24 for processing on July 16, 2024, and the ADR Office designated the referral ADR 1174. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

Summary of Case: Coalition for Fantasy Sports PAC and Kayla Lott, Treasurer (Respondents or 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 in additional receipts and \$26,400 in additional disbursements which were not disclosed in the original report.

On April 25, 2024, the Committee filed a Form 99 (Miscellaneous Electronic Submission), stating that the amended report disclosed additional activity for two reasons. First, the compliance officers did not initially have access to view the committee's 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.

The Committee states it has since 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.

