

24L-29

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 3, 2024

ANALYST: Michael A. Williamson

I. COMMITTEE: Big Red Leadership PAC  
C00808121  
Robert F. Carlin, Treasurer  
P.O. Box 2485  
Springfield, VA 22152

II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(2)  
11 C.F.R. §104.4(b)(2)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)**

Big Red Leadership PAC (“the Committee”) failed to timely file one (1) 48-Hour Report to support two (2) independent expenditures totaling \$269,156.00 disclosed on the 2024 April Quarterly Report, made up to and including the 20<sup>th</sup> day before the 2024 Senate Primary Election in Nebraska held on May 14, 2024 (Attachment 1).

On April 3, 2024, the Committee filed one (1) [48-Hour Report](#) to support two (2) independent expenditures totaling \$269,156.00 disseminated on February 29, 2024.

On April 15, 2024, the Committee filed the [2024 April Quarterly Report](#) covering the period from January 1, 2024 to March 31, 2024. The report included a [Schedule E \(Itemized Independent Expenditures\)](#) disclosing two (2) independent expenditures totaling \$269,156.00 made in support of one (1) federal candidate.

On April 24, 2024, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2024 April Quarterly Report. The RFAI noted that the Committee may have failed to timely file one (1) or more of the required 48-Hour Reports of independent expenditures. A chart was included with the RFAI identifying two (2)

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independent expenditures, totaling \$269,156.00 for which a 48-Hour had not been timely filed (Attachment 1).

On April 30, 2024, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the 2024 April Quarterly Report. The Committee stated, in part:

“There was an error in the transmittal of the electronic filing, and we did not become aware of it until we were preparing the April 15 Quarterly report. We then immediately rectified the issue and uploaded the report.”

Since July 24, 2024, the Reports Analysis Division (RAD) logged two (2) communications with a representative of the Committee, which reflect efforts to help the Committee voluntarily comply with the Act in response to the matters referenced above. RAD was able to successfully connect with the Committee on one (1) of these occasions and notified Sue Carlin, Assistant Treasurer, 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: [Big Red Leadership PAC](#).

**Big Red Leadership PAC (C00828061)****2024 April Quarterly Report****48-Hour Report Not Timely Filed**

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported</b>	<b>Election</b>	<b>48-Hour Report Filed</b>
Armada Strategies	2/29/24	\$240,153.00	Bacon, Donald J	2024 NE Primary (5/14/2024)	4/3/24
Madison McQueen LLC	2/29/24	<b>\$29,003.00</b> <i>48-Hour Report Required</i>	Bacon, Donald J	2024 NE Primary (5/14/2024)	4/3/24