

24L-46

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 12, 2024

ANALYST: Jack Baisden

- I. COMMITTEE:
- American Principles Project PAC
C00544387
Anthony LaBruna, Treasurer (9/28/24 – Present)
David R. Langdon, Treasurer (3/6/18 – 9/27/24)
2800 Shirlington Road
Suite 901
Arlington, VA 22206
- 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)

American Principles Project PAC (“the Committee”) failed to disclose all financial activity on its 2024 April Quarterly Report filed on April 15, 2024. On July 13, 2024, the Committee filed an Amended 2024 April Quarterly Report which disclosed \$178,262.12 in additional in-kind receipts¹ which were not disclosed in the original report (Attachment 1).

¹ Per the reporting requirement for in-kind contributions received, the Committee disclosed additional receipts totaling \$178,262.12 on Schedule A and additional disbursements to offset the in-kind receipts totaling \$178,262.12 on Schedule B, resulting in a total increase of \$178,262.12 on the Amended 2024 April Quarterly Report.

On April 15, 2024, the Committee filed the original [2024 April Quarterly Report](#) covering the period from January 1, 2024 through March 31, 2024. The report disclosed \$5,500.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) of the [Detailed Summary Page](#). (Attachment 1).

On July 13, 2024, the Committee filed an [Amended 2024 April Quarterly Report](#). The report disclosed \$183,762.12 in receipts on Line 11(a)(i) of the [Detailed Summary Page](#), a total increase of \$178,262.12 (Attachment 1).

On August 20, 2024, a [Request for Additional Information \(RAI\)](#) was sent to the Committee referencing the Amended 2024 April Quarterly Report, received July 13, 2024. The RAI requested clarification regarding the substantial increase in receipts a disclosed on the Amended 2024 April Quarterly Report.

On September 24, 2024, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RAI referencing the Amended 2024 April Quarterly Report, received July 13, 2024. The Committee stated:

“This notice is submitted in response to the Request for Additional Information dated August 20, 2024 with reference to the committee's Amended April Quarterly Report filed on July 13, 2024. The report was amended to disclose an in-kind contribution received by the committee in the form of office and overhead expenses pertaining to 2023. These expenses were not disclosed on the initial April Quarterly filing because they were unknown at the time of filing and had not been calculated.”

Since October 22, 2024, the Reports Analysis Division (RAD) logged three (3) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act in response to the matter referenced above. RAD was able to connect with the Committee on one (1) of these occasions and notified Joe Vanderhorst, 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: [American Principles Project PAC](#).

American Principles Project PAC (C00544387)[2024 April Quarterly Report](#) / [Amended 2024 April Quarterly Report](#)Overview of Additional Receipts

Report Line	Original 2024 April Quarterly Report	Amended 2024 April Quarterly Report, received 7/13/2024	Variance Amount
Receipts			
Line 11(a)(i): Itemized Individual Contributions	\$5,500.00	\$183,762.12	\$178,262.12
		Total:	\$178,262.12