

~~REPORTS ANALYSIS DIVISION REFERRAL~~

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 27, 2013

ANALYST: Edward D. Ryan

- I. COMMITTEE: American Bridge 21st Century
C00492140
Rodell Mollineau, Treasurer (4/12/12 – Present)
David Brock (11/23/10 – 4/11/12)
455 Massachusetts Ave. NW Suite 650
Washington, DC 20001
- II. RELEVANT STATUTE: 2 U.S.C. § 434(b)(8)
11 CFR §§ 104.3(d)
- III. BACKGROUND:

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

American Bridge 21st Century (“the Committee”) amended its 2011 Year-End Report to disclose additional debts totaling \$360,060.70 which were not disclosed in the original report (Attachment 2).

On January 31, 2012, the Committee filed the original 2011 Year-End Report, covering the period from July 1, 2011 through December 31, 2011. The report disclosed \$293,458.37 in debts on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Image 12970338399).

On April 13, 2012, the Committee filed an Amended 2011 Year-End Report. The report disclosed \$655,012.15 in debts on Line 10 of the Summary Page (Image 12951396067). Of that amount, \$361,635.62 were disclosed on Schedule D as newly incurred debts for the reporting period that were not disclosed in the original report (Image 12951396379).

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On May 24, 2012, the Committee filed an Amended 2011 Year-End Report. The report disclosed no change in newly incurred debts from the previous amendment (Image 12951898021).

On February 21, 2013, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2011 Year-End Report, received May 24, 2012. Among other issues, the RAI requested clarification regarding the substantial increase in newly incurred debts disclosed on the Amended 2011 Year-End Report that were not disclosed in the original filing (Image 13330025369-70).

On April 18, 2013 the Committee filed a Miscellaneous Electronic Submission ("Form 99") stating, in part, "A periodic review showed that the Committee owed additional debt not previously reported. As soon as the Committee learned of the additional debt, it amended its report accordingly" (Image 13961662780).

On July 26, 2013, the Reports Analysis Division (RAD) Analyst spoke to Brian Svoboda, legal counsel for the Committee, and explained that the additional debts disclosed on the Amended 2011 Year-End Report would be referred for possible further action. Mr. Svoboda asked whether the referral would be to the Office of General Counsel (OGC) or to the Alternative Dispute Resolution Office (ADRO). The Analyst replied that he did not know at that time and asked if there was any additional information that the Committee wanted to add to the public record to explain the increase in debts. The Analyst advised Mr. Svoboda that the Committee could provide additional clarifying information by filing a Form 99 detailing the information for the public record (Attachment 3).

On July 30, 2013, the Committee filed an Amended 2011 Year-End Report. The report disclosed \$653,437.23, in debts on Line 10 of the Summary Page (Image 13964473759). Of that amount, \$360,060.70 were disclosed on Schedule D as newly incurred debts for the reporting period that were not disclosed in the original report (Image 13964474093).

To date, no further communications have been received from the Committee regarding this matter.

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