REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: July 11, 2012

ANALYST: Daniel Buckley

15190300222

I. COMMITTEE: Democrats Reshaping America (DREAMPAC)
C00423079
Jennifer May, Treasurer (11/16/11-present)
Kinde Durkee, Treasurer (4/17/06-11/15/11)
50 E St. SE, Suite 1
Washington, DC 20003

II. RELEVANT STATUTE: 2 U.S.C. § 432(b) and (c)
2 U.S.C. § 434(b)
11 CFR § 102.9
11 CFR § 102.15
11 CFR § 104.3

III. BACKGROUND:

Other Violations of the Federal Election Campaign Act (Unauthorized Use of Committee Funds)

Democrats Reshaping America (DREAMPAC) ('the Committee") filed its 2011 Year End Report to disclose apparent unauthorized disbursements of $11,401.95 (Attachment 2).

On January 31, 2012, the Committee filed the 2011 Year End Report covering the period from July 1, 2011 through December 31, 2011. The report disclosed a disbursement on Schedule B, supporting Line 29 (Other Disbursements) totaling $11,401.95 with a purpose of "adjustment for unauthorized withdrawals by former treasurer" (Image 12970317553). In a memo text attached to the report, the Committee stated, in full:

> "The Committee discovered that the former treasurer embezzled funds from the Committee. The ending cash on hand figure represents the

current balance of the accounts at the end of this reporting period. While not anticipated, it is possible that the Committee will amend this figure should additional information come to its attention" (Image 12970317547).

On May 8, 2012, the Reports Analysis Division (RAD) Analyst called Jennifer May, the Committee Treasurer. The Analyst left Ms. May a voicemail stating that the unauthorized disbursements disclosed on the 2011 Year End Report would be referred for further action. The Analyst stated that if the Committee wished to put any further information on the public record they should do so by May 15, 2012. The Analyst also informed Ms. May of the option of filing a *sua sponte* submission and left instructions on where she could obtain more information about doing so (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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