

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 19, 2016

ANALYST: Nicole Miller

I. COMMITTEE:

Foundation for a Greater America INC
C00555862
Anastasia Ault, Treasurer (7/19/16 - Present)
James P. Hodgins, Treasurer (1/30/14-7/18/16)
P.O. Box 3587
Tustin, CA 92781

II. RELEVANT STATUTE:

52 U.S.C. §30104(b)
11 CFR §104.3(b)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Provide all Financial Activity)

Foundation for a Greater America INC ("the Committee") amended its 2014 30 Day Post-General Report to disclose additional disbursements of \$182,280.96, which were not disclosed on the original report (Attachment 2).

On January 7, 2015, the Committee filed the original 2014 30 Day Post-General Report covering the period from October 16, 2014 through November 24, 2014. The report disclosed \$15,462.70 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$32,010.00 in disbursements on Line 26 (Loan Repayments Made) and \$0.00 in disbursements on Line 27 (Loans Made) of the Detailed Summary Page (Image 15970003171).

On April 29, 2015, the Committee filed an Amended 2014 30 Day Post-General Report. The report disclosed \$18,703.42 in disbursements on Line 21(b), \$67,865.00 in disbursements on Line 26 and \$164,913.34 in disbursements on Line 27 of the Detailed Summary Page, a total increase in disbursements of \$204,009.06 from the original report (Image 15951233090).

On May 26, 2015 a Request For Additional Information (RFAI) was sent to the Committee referencing the Amended 2014 30 Day Post-General Report, received April 29, 2015. Among other items, the RFAI requested clarification for the substantial increase in disbursements (Image 15330083230).

On June 29, 2015 James Hodgins, the Committee's Treasurer called and spoke to a Reports Analysis Division (RAD) Analyst and asked if he could have an extension on the due date for the RFAs referencing the Amended 2014 30 Day Post-General Report, received April 29, 2015 because of vendor-software difficulties. The Analyst explained that extensions are not provided and advised that the response should be filed as soon as possible (Attachment 3).

Between July 8, 2015 and June 6, 2016, the Reports Analysis Division (RAD) Analyst contacted, or attempted to contact, Mr. Hodgins and Milton Ault, Committee Chairman, forty-nine (49) times via phone or email. Among other items, the RAD Analyst repeatedly informed Mr. Hodgins and/or Mr. Ault that that substantial increase in disbursements addressed on the RFAI referencing the Amended 2014 30 Day Post-General Report, received April 29, 2015, could possibly be referred for further action and that the Committee should clarify that matter as soon as possible. Mr. Hodgins repeatedly expressed difficulty working with his electronic filing vendor to file an amendment, and the Analyst repeatedly informed Mr. Hodgins that if he was unable to resolve his difficulties with his vendor, Commission staff were available to assist him in rebuilding his report in the Commission's FECFile software (Attachment 3).

On June 21, 2016, the RAD Analyst spoke with Ms. Shawnda Deane, the Committee's consultant. Among other issues, the Analyst explained that the substantial increase in activity disclosed on the Amended 2014 30 Day Post-General Report, received April 29, 2015 could be referred for further action (Attachment 3).

On July 15, 2016, the Committee filed an Amended 2014 30 Day Post-General Report. The report disclosed \$19,575.32 in disbursements on Line 21(b), \$45,265.00 in disbursements on Line 26 and \$164,913.34 in disbursements on Line 27 of the Detailed Summary Page, a total increase in disbursements of \$182,280.96 from the original report (Image 201607159020655276, Attachment 2).

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

O-Index (2015-2016)

Cmte. ID: C0055862 Cmte. Name: FOUNDATION FOR A GREATER AMERICA, INC.

Treasurer Name: AULT, ANASTASIA Address: P.O. BOX 3587, TUSTIN, CA 92781

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form	Tip	Rpt	Tip	AI	Receipt	Dt	Pgs	Begin	Img#	End	Cvg	Dt	End	Cvg	Dt	Ltr	Mail	Dt	Begin	Cash	Receipts	Disb	End	Cash	Debits	Loans	Debits	Loans		
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R02	MY	N			1/15/2015		4	20151115030007955		6/30/2015	6/30/2015	1/15/2015																		
R07	YE	N			2/19/2016		2	201602190300036971		7/1/2015	12/31/2015	2/19/2016																		
R02	YE	N			8/28/2016		2	201608280300057769		7/1/2015	12/31/2015	8/29/2016																		
R07	Q1	N			5/3/2016		2	201605040300040091		1/1/2016	3/31/2016	5/3/2016																		
R02	Q2	N			9/12/2016		2	201609120300058485		1/1/2016	6/30/2016	9/12/2016																		
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F3XN	YE	N			7/15/2016		191	201607159020656687		7/1/2015	12/31/2015																			
F3XN	Q1	N			7/15/2016		122	201607159020657571		1/1/2015	3/31/2016																			
F3XN	Q2	N			7/15/2016		74	201607159020658413		4/1/2016	6/30/2016																			
F1A	A				3/17/2015		4	15950871914																						
F1A	A				7/19/2016		4	201607199020723974																						
		Totals																												

O-Index (2013-2014)

Cmte. ID: C0055862 Cmte. Name: FOUNDATION FOR A GREATER AMERICA, INC.

Treasurer Name: AULT, ANASTASIA Address: P.O. BOX 3587, TUSTIN, CA 92781

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Form	Tip	Rpt	Tip	AI	Receipt	Dt	Pgs	Begin	Img#	End	Cvg	Dt	End	Cvg	Dt	Ltr	Mail	Dt	Begin	Cash	Receipts	Disb	End	Cash	Debits	Loans	Debits	Loans		
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F3XA	30G	A			4/29/2015		56	15951233087		10/16/2014	1/2/2015																			

Form	Tr	Rpt	Tr	Al	Reprt	DT	Pgt	Begin	img#	End	Cvg	DT	Boq	Cvg	DT	Boq	Cash	Receipts	Diab	End	Cash	Debits	Loans	Debits	Loans	
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F3XN	YE	N	1/30/2015	44	15950566149	11/25/2014	11/25/2014	39,249		11/25/2014	11/25/2014	11/25/2014	39,249		11/25/2014	11/25/2014	39,249		11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014
F3XA	AL	YE	4/27/2016	48	15951231848	11/25/2014	11/25/2014	39,249		11/25/2014	11/25/2014	11/25/2014	39,249		11/25/2014	11/25/2014	39,249		11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014
F3XA	YE	A	7/15/2016	38	201607159020655847	11/25/2014	11/25/2014	34,153		11/25/2014	11/25/2014	11/25/2014	34,153		11/25/2014	11/25/2014	34,153		11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	11/25/2014	
F1	SI	N	1/30/2014	7	14931710459																					
F1A	A	N	3/10/2014	4	14940552984																					
Totals																										

O-Index (2011-2012)
 Cmte. ID: C00555862 Cmte. Name: FOUNDATION FOR A GREATER AMERICA, INC.
 Treasurer Name: AULT, ANASTASIA Address: P.O. BOX 3587, TUSTIN, CA 92781
 Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

No records were found for this cycle.

Foundation for a Greater America INC (C00555862)

2014 30 Day Post-General Report/Amended 2014 30 Day Post-General Report, received 7/15/16

Overview of Additional Disbursements

Report Line	Original 2014 30 Day Post- General Report (Image 15970003171)	Amended 2014 30 Day Post- General Report, Received 7/15/16 (Image 201607159020655276)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$15,462.70	\$19,575.32	\$4,112.62
Line 26: Loan Repayments Made	\$32,010.00	\$45,265.00	\$13,255.00
Line 27: Loans Made	\$0.00	\$164,913.34	\$164,913.34
		Total:	\$182,280.96