

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 14, 2017

ANALYST: Maureen Benitz

I. COMMITTEE:

Working Families Party Independent
Expenditure Committee
C00626861
Mike Boland, Treasurer
1 Metrotech Center
FL 11
Brooklyn, NY 11201

II. RELEVANT STATUTE:

52 U.S.C. §30104(g)(1)
11 CFR §104.4(c)

III. BACKGROUND:

Failure to Provide a Supporting Schedule (Failure to Timely File a 24-Hour Report)

Working Families Party Independent Expenditure Committee ("the Committee") failed to timely file one (1) 24-Hour Report to support one (1) independent expenditure, totaling \$44,619.51, disclosed on the 2016 July Quarterly Report made after the 20th day but more than 24 hours before the 2016 Primary Election held in the state of Oregon on May 17, 2016 (Attachment 2).

On October 15, 2016, the Committee filed the 2016 July Quarterly Report covering the period from April 1, 2016 through June 30, 2016, which included a Schedule E (Itemized Independent Expenditures) disclosing one (1) independent expenditure totaling \$44,619.51 made in support of one (1) federal candidate. The Committee failed to file one (1) 24-Hour Report to support one (1) independent expenditure totaling \$44,619.51 for the Primary Election in the state of Oregon (Image 201610159032861011).

On November 9, 2016, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2016 July Quarterly Report. The RFAI noted that the Committee may have failed to file one or more required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$44,619.51, for which a 24-Hour Report had not been filed (Image 201611090300068036).

On November 14, 2016, the Reports Analysis Division (RAD) Analyst spoke with Alex Rabb, the Committee's Attorney. Among other issues, Mr. Rabb asked how to respond to the RFAI sent November 9, 2016. The Analyst advised that the Committee should file the missing 24-Hour Report, even if it is late (Attachment 3).

On December 14, 2016, the Committee filed one (1) 24-Hour Report to support one (1) independent expenditure, totaling \$44,619.51, disseminated on May 3, 2016, for the 2016 Primary Election held in the state of Oregon on May 17, 2016 (Image 201612149040609508).

On December 19, 2016, the RAD Analyst called Mike Boland, the Committee's Treasurer, to address the 24-Hour Report that the Committee failed to timely file in support of one (1) independent expenditure on their 2016 July Quarterly Report. The Analyst explained that the issue may be referred for further action by the Commission. The Analyst explained that the purpose of the call was to inform the Committee of the potential referral and give them an opportunity to put further information on the public record if they wished to do so (Attachment 3).

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

17-108604MSTH

O-Index (2017-2018)													
Form Tpl		Rpt Tpl	All	Recpt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash
										Debits	Loans	Debits & Loans	
Cmte. ID: C00626861 Cmte. Name: WORKING FAMILIES PARTY INDEPENDENT EXPENDITURE COMMITTEE													
Treasurer Name: BOLAND, MIKE Address: 1 METROTECH CENTER FL11, BROOKLYN, NY 11201													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													

No records were found for this cycle.

O-Index (2015-2016)													
Form Tpl		Rpt Tpl	All	Recpt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash
										Debits	Loans	Debits & Loans	
Cmte. ID: C00626861 Cmte. Name: WORKING FAMILIES PARTY INDEPENDENT EXPENDITURE COMMITTEE													
Treasurer Name: BOLAND, MIKE Address: 1 METROTECH CENTER FL11, BROOKLYN, NY 11201													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
RQ2	Q2	N		1/9/2016	3	2016109300008036	4/1/2016	6/30/2016	11/9/2016				
RQ2	12G	A		1/10/2017	4	201701110300075383	10/1/2016	10/19/2016	1/10/2017				
RQ2	30G	N		1/12/2017	2	201701130300075580	10/20/2016	11/28/2016	1/12/2017				
F3XN	Q2	N		10/15/2016	7	201610159032861005	4/1/2016	6/30/2016		\$0	\$55,000	\$44,659	\$10,340
F3XN	Q3	N		10/15/2016	5	201610159032861012	7/1/2016	9/30/2016		\$10,340	\$0	\$0	\$10,340
F3XA	Q3	A		10/27/2016	6	201610279036723252	7/1/2016	9/30/2016		\$10,340	\$0	\$0	\$10,340
F3XA	Q3	A		10/27/2016	7	201610279036878046	7/1/2016	9/30/2016		\$10,340	\$0	\$0	\$10,340
F3XA	12G	A		10/27/2016	14	201610279036984269	10/1/2016	10/19/2016		\$10,340	\$60,500	\$15,035	\$55,805
F3XN	12G	N		10/27/2016	13	201610279036986615	10/1/2016	10/19/2016		\$10,340	\$50,500	\$15,000	\$45,840
F3XN	30G	N		12/8/2016	11	201612089040551934	10/20/2016	11/28/2016		\$55,805	\$353,444	\$327,277	\$81,971
F3XN	YE	N		1/31/2017	12	201701319042385030	11/29/2016	12/31/2016		\$81,971	\$15,271	\$17,920	\$79,322
F1N		N											
F24N	24			12/14/2016	1	201612149040609508							
F24N	24			10/27/2016	6	201610279036918952							
Totals										\$484,215	\$404,892		

O-Index (2013-2014)													
Form Tpl		Rpt Tpl	All	Recpt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash
										Debits	Loans	Debits & Loans	
Cmte. ID: C00626861 Cmte. Name: WORKING FAMILIES PARTY INDEPENDENT EXPENDITURE COMMITTEE													
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No records were found for this cycle.

Working Families Party Independent Expenditure Committee (C00626861)
2016 July Quarterly Report

24-Hour Report Not Timely Filed

Name of Payee	Date of Expenditure (Schedule E)	Expenditure Amount	Candidate Supported	State and Date of Election in which Disseminated
Red Horse Strategies	5/3/16	\$44,619.51 24-Hour Report Required	Dave McTeague	Oregon - 2016 Primary (5/17/16)