

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: June 26, 2017

ANALYST: Brian Jones

I. COMMITTEE: 21ST CENTURY DEMOCRATS  
(C00230342)  
Bill Combs, Treasurer  
2120 L Street, NW  
Suite 305  
Washington, DC 20037

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)  
11 CFR § 104.3(a)

III. BACKGROUND:

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

21ST CENTURY DEMOCRATS ("the Committee") amended its 2016 30-Day Post-General Report to disclose additional receipts totaling \$118,367.13, which were not disclosed on the original report (Attachment 2).

On December 8, 2016, the Committee filed the original 2016 30 Day Post-General Report covering the period from October 1, 2016 through November 28, 2016. The report disclosed \$32,741.43 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals), \$38,410.10 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals), and \$0.00 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 201612089040546434, Attachment 2).

On February 15, 2017, the Committee filed an Amended 2016 30 Day Post-General Report. The report disclosed \$52,969.26 in receipts on Line 11(a)(i), \$136,468.34 in receipts on Line 11(a)(ii), and \$81.06 in receipts on Line 17 of the Detailed Summary Page, a total increase of \$118,367.13 from the original report (Image 201702159049699657, Attachment 2).

On March 23, 2017, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2016 30 Day Post-General Report, received February 15, 2017. Among other items, the RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2016 30 Day Post-General Report (Image 201703230300083064).

On April 27, 2017, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI referencing the Amended 2016 30 Day Post-General Report, received February 15, 2017. The Committee stated:

"This submission is in response to Commission's letter dated 3/23/2017 in reference to the 30 Day Post-General report (10/1/2016 - 11/28/2016). The 21st Century Committee has reviewed its disclosure process and has completed an exhaustive internal audit of all data processed during FY2016. Specifically, during this audit, the committee discovered that a 3rd party vendor did not upload itemized donor data for inclusion in the report. However, the committee amended its reports once the data was uploaded. The additional disbursement disclosed on the amended report was due to the non-federal loan payment paid from federal funds, where the non-federal loan payment was inadvertently omitted from the report. Please note that the 21st Century Committee has taken major steps to adequately correct its disclosure process to be in compliance with the Commission's guidelines" (Image 201704279053484280).

On May 4, 2017, the Reports Analysis Division (RAD) Analyst called Bill Combs, Treasurer for the Committee. The RAD Analyst left a voicemail message and requested a return phone call from Mr. Combs (Attachment 3).

On May 24, 2017, the RAD Analyst called Mr. Combs. The RAD Analyst left a voicemail message stating that based on the substantial increase in financial activity disclosed on the Amended 30 Day Post-General Report, received February 15, 2017 the Committee may be referred to another office within the Commission for further enforcement action. I requested a return phone call from Mr. Combs at his earliest convenience to discuss this outstanding compliance matter (Attachment 3).

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

O-Index (2017)  
 Cmte. ID: C00230342    Cmte. Name: 21ST CENTURY DEMOCRATS  
 Treasurer Name: COMBS, BILL    Address: 2120 L STREET NW SUITE 305, WASHINGTON, DC 20037  
 Cmte. Type: Q (QUALIFIED NON-PARTY)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	A/I	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			2/9/2017	1	201702099049340407										
MS-T			4/27/2017	1	201704279053484280										
Totals										\$0				\$0	

O-Index (2015-2016)  
 Cmte. ID: C00230342    Cmte. Name: 21ST CENTURY DEMOCRATS  
 Treasurer Name: COMBS, BILL    Address: 2120 L STREET NW SUITE 305, WASHINGTON, DC 20037  
 Cmte. Type: Q (QUALIFIED NON-PARTY)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	A/I	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			9/24/2015	1	201509249002777273										
RQ2	MY	N	8/20/2015	3	201508200300003336	1/1/2015	6/30/2015	8/20/2015							
RQ2	YE	A	8/25/2016	2	201608250300057648	7/1/2015	12/31/2015	8/25/2016							
RQ2	Q1	N	7/12/2016	2	201607120300052360	1/1/2016	3/31/2016	7/12/2016							
RQ2	Q2	N	8/8/2016	2	201608080300056643	4/1/2016	6/30/2016	8/8/2016							
RQ2	30G	N	1/5/2017	2	201701050300074699	10/1/2016	11/28/2016	1/5/2017							
RQ2	30G	A	3/23/2017	2	201703230300083064	10/1/2016	11/28/2016	3/23/2017							
RQ2	YE	N	2/7/2017	2	201702070300077187	11/29/2016	12/31/2016	2/7/2017							
F3XA	MY	N	7/31/2015	253	201507319000554081	1/1/2015	6/30/2015		\$196,003	\$607,196	\$461,903	\$341,296	\$216,873		\$216,873
F3XA	MY	A	9/24/2015	255	201509249002777274	1/1/2015	6/30/2015		\$196,003	\$609,384	\$466,311	\$339,076	\$216,873		\$216,873
F3XA	MY	A	8/16/2016	260	201608169022452830	1/1/2015	6/30/2015		\$196,003	\$609,364	\$466,291	\$339,076	\$216,873		\$216,873
F3XA	YE	N	1/31/2016	311	2016013190005218654	7/1/2015	12/31/2015		\$351,008	\$254,408	\$474,902	\$130,514	\$216,873		\$216,873
F3XA	YE	A	8/16/2016	436	201608169022455000	7/1/2015	12/31/2015		\$339,076	\$276,021	\$490,863	\$124,235	\$216,873		\$216,873
F3XA	Q1	N	4/15/2016	119	201604159012557952	1/1/2016	3/31/2016		\$130,514	\$189,529	\$142,403	\$176,640	\$216,873		\$216,873
F3XA	Q1	A	8/16/2016	120	2016081690224548484	1/1/2016	3/31/2016		\$124,235	\$186,919	\$173,542	\$137,612	\$216,873		\$216,873
F3XA	Q2	N	7/15/2016	127	201607159020619939	4/1/2016	6/30/2016		\$176,640	\$134,650	\$169,924	\$141,367	\$216,873		\$216,873
F3XA	Q2	A	8/16/2016	128	201608169022460201	4/1/2016	6/30/2016		\$137,612	\$134,323	\$169,924	\$102,011	\$216,873		\$216,873
F3XA	Q3	N	10/15/2016	224	201610159032873804	7/1/2016	9/30/2016		\$102,011	\$204,334	\$187,943	\$118,402	\$216,873	\$5,000	\$221,873
F3XA	Q3	A	2/15/2017	265	201702159049699069	7/1/2016	9/30/2016		\$102,011	\$204,682	\$188,325	\$118,368	\$216,873		\$221,873
F3XA	30G	N	12/8/2016	116	201612089040546432	10/1/2016	11/28/2016		\$118,402	\$71,151	\$62,236	\$127,317	\$216,873	\$1,340	\$218,214
F3XA	30G	A	2/15/2017	189	201702159049699655	10/1/2016	11/28/2016		\$118,368	\$189,518	\$131,970	\$175,916	\$216,873		\$218,214
F3XA	YE	N	1/31/2017	107	201701319042372312	11/29/2016	12/31/2016		\$192,463	\$174,341	\$140,706	\$226,098	\$216,873	\$1,340	\$218,214
F3XA	YE	A	2/15/2017	106	201702159049699849	11/29/2016	12/31/2016		\$175,916	\$175,211	\$140,706	\$210,421	\$216,873		\$218,214
Totals										\$1,776,042	\$1,761,624				

**21ST CENTURY DEMOCRATS (C00230342)**  
**2016 30 Day Post-General Report/Amended 2016 30 Day Post-General Report**

**Overview of Additional Receipts**

Report Line	2016 30-Day Post-General (Image 201612089040546434)	Amended 2016 30 Day Post-General, received 2/15/17 (Image 201702159049699657)	Variance Amount
<b>Line 11(a)(i): Itemized Individual Contributions</b>	<b>\$32,741.43</b>	<b>\$52,969.26</b>	<b>\$20,227.83</b>
<b>Line 11(a)(ii): Unitemized Individual Contributions</b>	<b>\$38,410.10</b>	<b>\$136,468.34</b>	<b>\$98,058.24</b>
<b>Line 17: Other Federal Receipts</b>	<b>\$0.00</b>	<b>\$81.06</b>	<b>\$81.06</b>
		<b>Total Variance:</b>	<b>\$118,367.13</b>