

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: August 4, 2017

ANALYST: Nicholas Tarone

I. COMMITTEE: Arizona Grassroots Action PAC
(C00558445)
Lisa Lisker, Treasurer
228 S. Washington St., Ste. 115
Alexandria, VA 22314

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)

Arizona Grassroots Action PAC ("the Committee") failed to timely file one (1) 24-Hour Report to support one (1) independent expenditure totaling \$30,000.00 disclosed on the 2016 30 Day Post-General Report made after the 20th day but more than 24 hours before the 2016 General Election (Attachment 2).

On December 8, 2016, the Committee filed the 2016 30 Day Post-General Report covering October 20, 2016 through November 28, 2016. The report included a Schedule E (Itemized Independent Expenditures) disclosing six (6) independent expenditures totaling \$94,692.05 made in support of or in opposition to two (2) federal candidates. The Committee failed to timely file one (1) 24-Hour Report to disclose one (1) independent expenditure totaling \$30,000.00 for the 2016 General Election (Images 201612089039977107-09).

On April 12, 2017, a Request for Additional Information (RAFI) was sent to the Committee referencing the 2016 30 Day Post-General Report. The RAFI noted that the Committee may have failed to file one or more of the required 24-Hour Reports for the independent expenditures disclosed on the report. A chart was included with the RAFI

identifying one (1) independent expenditure, totaling \$30,000.00, for which a 24-Hour Report had not been filed (Image 201704120300084331).

On May 10, 2017, the Committee filed one (1) 24-Hour Report to support one (1) independent expenditure, totaling \$30,000.00, disseminated on November 4, 2016 (Image 201705109053515779).

Subsequently, on May 10, 2017, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI referencing the 2016 30 Day Post-General Report. The Committee stated, in part,

"Arizona Grassroots Action PAC is in receipt of your April 12, 2017 RFAI regarding the Arizona Grassroots Action PAC 30 Day Post-General Report. A notice disclosing the independent expenditure referenced in the RFAI was filed on 5/10/17. The notice was not filed within 24 hours of dissemination due to an administrative oversight.

The Committee makes every effort to submit all required filings accurately and on time. Please note that the Committee filed approximately seventy 24 and 48 hour reports of independent expenditures in 2016 that were filed within the required timeframe.

The Committee has reviewed its process and will implement additional procedures to ensure that all future filings are submitted in a timely manner" (Image 201705109053515780).

On May 30, 2017, the Reports Analysis Division (RAD) analyst called Lisa Lisker, the Committee's Treasurer. The RAD Analyst explained the Committee's apparent failure to timely file one or more of the required 24-Hour Reports for Independent Expenditures disclosed on the 2016 30 Day Post-General Report could be referred for potential further action. The RAD Analyst stated the Committee can file an additional FEC Form 99 to provide any further information for the public record (Attachment 3).

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

Totals																									

Arizona Grassroots Action PAC (C00558445)
2016 30 Day Post-General Report, received 12/8/2016

24-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	Election	24-Hour Report Filed
Connect Strategic Communications LLC	11/4/2016	\$30,000.00 <i>24-Hour Report Required</i>	John McCain	2016 General	5/10/2017