

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 27, 2017

ANALYST: Romy Adame-Wilson

I. COMMITTEE:

The Loose Group  
C00010793  
James Baker, Treasurer  
PO Box 78093  
Atlanta, GA 30357

II. RELEVANT STATUTE:

52 U.S.C. § 30104(b)(4)  
11 CFR § 104.3(b)

III. BACKGROUND:

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

The Loose Group ("the Committee") amended its 2016 12 Day Pre-General Report to disclose additional disbursements totaling \$83,000.00, which were not disclosed on the original report (Attachment 2).

On October 25, 2016, the Committee filed the original 2016 12 Day Pre-General Report covering the period from October 1, 2016 through October 19, 2016. The report disclosed \$0.00 in disbursements on Line 23 (Contributions to Federal Candidates/Committees and Other Political Committees) and \$0.00 in disbursements on Line 29 (Other Disbursements- Including Non-Federal Donations) on the Detailed Summary Page (Image 201610259034563483, Attachment 2).

On May 16, 2017, the Committee filed an Amended 2016 12 Day Pre-General Report. The report disclosed \$80,000 in disbursements on Line 23, and \$3,000.00 in disbursements on Line 29 of the Detailed Summary Page, a total increase of \$83,000.00 from the original report (Image 201705169053889792, Attachment 2).

On July 6, 2017, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2016 12 Day Pre-General Report, received May 16, 2017. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2016 12 Day Pre-General Report that were not disclosed in the original filing (Image 201707060300087843).

On August 10, 2017, Mr. Baker, the Committee Treasurer, called the Reports Analysis Division (RAD) Analyst. Mr. Baker explained that he was having difficulty reaching the current person in charge of filing reports and needed to respond to an RFAI. The RAD analyst walked him through using the FEC web form and explained that they could not tell him whether further enforcement action would be taken on the issue at this point (Attachment 3).

That same day, the Committee filed two (2) Miscellaneous Electronic Submissions ("FEC Form 99") in response to the RFAI referencing the Amended 2016 12 Day Pre-General Report, received May 16, 2017. In both filings, the Committee stated, in part:

"The increase in disbursements on the amended report for The Loose Group's 12 day Pre-General Report for the period 10/01/2016-10/19/2016 was due to an administrative error that occurred at the office of the preparer. The error was discovered in May of 2017 and thus amended reports were filed immediately reflecting accurate expenditures to candidates totaling an additional \$83,000. Because this error does not live up to our standards, we have replaced the preparer and you will note that is reflected in our most recent report filed for the period ending June 30, 2017. The Loose Group has always reported contributions and disbursements in good faith and in accord with FEC laws and regulations. Thank you for your attention to this matter and please let me know if you have additional questions" (Images 201708109070313686 and 201708109070313545).

On October 19, 2017, the RAD Analyst called Mr. Baker. The RAD Analyst explained that based on the substantial increase in financial activity disclosed on the amendment received May 16, 2017 the Committee may be referred to another office within the Commission for potential further action. The RAD Analyst invited the Committee to file additional information regarding this issue. Mr. Baker stated that they had already disclosed all of the information they had available on the FEC Form 99s filed on August 10, 2017 (Attachment 3).

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

## O-Index (2017-2018)

Cmte. ID: C00010793 Cmte. Name: THE LOOSE GROUP  
 Treasurer Name: BAKER, JAMES MR. Address: PO BOX 78093, ATLANTA, GA 30357  
 Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	All	Recpt 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			8/10/2017	1	201708109070313545										
MS-T			8/10/2017	1	201708109070313686										
F3XN	MY	N	7/27/2017	31	201707279069826959	1/1/2017	6/30/2017		\$6,107	\$41,926	\$6,847	\$41,187			\$0
F3XA	MY	A	8/10/2017	31	201708109070313655	1/1/2017	6/30/2017		\$6,107	\$41,926	\$6,847	\$41,187			\$0
Totals										\$41,926	\$6,847				

## O-Index (2015-2016)

Cmte. ID: C00010793 Cmte. Name: THE LOOSE GROUP  
 Treasurer Name: BAKER, JAMES MR. Address: PO BOX 78093, ATLANTA, GA 30357  
 Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
RQ2	YE	N	4/4/2016	3	201604040300040739	7/1/2015	12/31/2015	4/4/2016							
RQ2	Q1	N	8/22/2016	3	201608220300057389	1/1/2016	3/31/2016	8/22/2016							
RQ2	Q2	N	8/22/2016	3	201608220300057392	4/1/2016	6/30/2016	8/22/2016							
RQ2	12G	A	7/6/2017	2	201707060300087843	10/1/2016	10/19/2016	7/6/2017							
F3XN	MY	N	7/6/2015	15	201507069000058086	1/1/2015	6/30/2015		\$16,469	\$13,100	\$709	\$28,860			\$0
F3XN	YE	N	1/21/2016	25	201601219004557634	7/1/2015	12/31/2015		\$28,860	\$30,925	\$5,723	\$34,061			\$0
F3XN	Q1	N	4/1/2016	20	20160411901228980	1/1/2016	3/31/2016		\$0	\$23,200	\$1,132	\$22,067			\$0
F3XA	Q1	A	5/16/2017	20	201705169053889276	1/1/2016	3/31/2016		\$54,061	\$21,000	\$1,045	\$74,016			\$0
F3XN	Q2	N	7/1/2016	20	201607119020392012	4/1/2016	6/30/2016		\$22,067	\$23,600	\$0	\$45,667			\$0
F3XA	Q2	A	5/16/2017	22	201705169053889749	4/1/2016	6/30/2016		\$74,016	\$21,775	\$32,771	\$63,019			\$0
F3XN	Q3	N	9/30/2016	18	201609309032147310	7/1/2016	9/30/2016		\$45,667	\$39,100	\$0	\$84,767			\$0
F3XA	Q3	A	5/16/2017	18	201705169053889771	7/1/2016	9/30/2016		\$63,019	\$26,200	\$285	\$88,934			\$0
F3XN	12G	N	10/25/2016	6	201610259034563480	10/1/2016	10/19/2016		\$84,767	\$3,350	\$0	\$88,117			\$0
F3XA	12G	A	5/16/2017	11	201705169053889789	10/1/2016	10/19/2016		\$88,934	\$3,350	\$83,000	\$9,284			\$0
F3XN	30G	N	11/29/2016	7	201611299037569939	10/20/2016	11/28/2016		\$88,117	\$5,250	\$0	\$93,367			\$0
F3XA	30G	A	5/16/2017	9	201705169053889800	10/20/2016	11/28/2016		\$9,284	\$5,250	\$10,350	\$4,184			\$0
F3XN	YE	N	1/4/2017	6	201701049040914447	11/29/2016	12/31/2016		\$93,367	\$2,100	\$0	\$95,467			\$0
F3XA	YE	A	5/16/2017	7	201705169053889809	11/29/2016	12/31/2016		\$4,184	\$2,100	\$176	\$6,107			\$0
Totals										\$123,700	\$134,061				

## O-Index (2013-2014)

Cmte. ID: C00010793 Cmte. Name: THE LOOSE GROUP  
 Treasurer Name: BAKER, JAMES MR. Address: PO BOX 78093, ATLANTA, GA 30357  
 Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
RQ2	Q3	N	3/1/2015	3	15330078380	7/1/2014	9/30/2014	3/1/2015							
F3XN	MY	N	7/31/2013	23	13964478268	1/1/2013	6/30/2013		(\$1,210)	\$27,750	\$800	\$25,739			\$0
F3XN	YE	N	1/31/2014	22	14960329347	7/1/2013	12/31/2013		\$25,739	\$24,875	\$1,377	\$49,236			\$0
F3XN	Q1	N	4/1/2014	15	14960674919	1/1/2014	3/31/2014		\$49,236	\$13,625	\$30,856	\$32,005			\$0
F3XN	Q2	N	7/10/2014	13	14941759338	4/1/2014	6/30/2014		\$32,005	\$11,000	\$0	\$43,005			\$0
F3XN	Q3	N	10/15/2014	14	14978259911	7/1/2014	9/30/2014		\$43,005	\$10,225	\$5,236	\$47,994			\$0
F3XA	Q3	A	4/15/2015	14	15951150215	7/1/2014	9/30/2014		\$43,005	\$10,225	\$5,236	\$47,994			\$0

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Attachment 1

**The Loose Group (C00010793)**

2016 12 Day Pre-General Report/Amended 12 Day Pre-General Report

Overview of Additional Receipts

Report Line	2016 12 Day Pre-General (Image 201610259034563483)	Amended 2016 12 Day Pre-General, received 5/16/17 (Image 201705169053889792)	Variance Amount
Line 23: Contributions to Federal Candidates and Committees	\$0.00	\$80,000.00	\$80,000.00
Line 29: Other Disbursements	\$0.00	\$3,000.00	\$3,000.00
		<b>Total Variance:</b>	<b>\$83,000.00</b>