

RAD REFERRAL #: A17-10

DATE: July 13, 2017

ANALYST: Nicholas Tarone

REPORTS ANALYSIS AUDIT REFERRAL

I. COMMITTEE: American Principles
C00492579
Eytan Laor, Treasurer
20533 Biscayne Blvd #250
Miami, FL 33180

TYPE OF COMMITTEE: Nonconnected

II. REGISTRATION DATE: January 25, 2011

III. MULTICANDIDATE STATUS DATE: September 26, 2011

IV. TOTAL POINTS ASSESSED:

V. SUMMARY OF AUDIT POINTS BY STANDARD:

Standard	#	Description	Total # of Point(s)	Points for Receipts	Points for Disbursements	Other Points
Standard	4	Failure to File Reports and Late Filing	Point(s)			
Standard	6	Mathematical Discrepancies	Point(s)			
Standard	7	Failure to Provide Supporting Schedules	Point(s)			
Standard	11	Failure to Properly Itemize Disbursements	Point(s)			
		TOTAL	Point(s)			

VI. NOTICES SENT TO AND RESPONSES RECEIVED FROM THE COMMITTEE:

See attached O-Index for the Committee.

VII. PROBLEMS FOR WHICH AUDIT POINTS WERE ASSESSED:

A. Standard 4 - Failure to File Reports and Late Filing:

Report Type	Due Date	Date Filed
2016 12G	10/27/16	12/8/16

Standard 4 Total:

Points for Receipts	Points for Disbursements	Other Points

B. Standard 6 - Mathematical Discrepancies:

Report Type	Violation (Description)	Points
2016 Q1	The beginning cash balance, \$78,433.78, was greater than the ending cash balance on the previous report, \$72,295.53, a discrepancy of \$6,138.25.	

Standard 6 Total:

Points for Receipts	Points for Disbursements	Other Points

C. Standard 7 - Failure to Provide Supporting Schedules:

Report Type	Violation (Description)	Points
2015 Amended YE, received 2/3/17	The Committee's report disclosed additional receipts totaling \$16,086.00 on Schedule A supporting Lines 11(a)(i), 11(a)(ii), and 11(c), and additional disbursements totaling \$46,488.94 on Schedule B supporting Lines 21(b), 23, and 28(a), resulting in an increase of more than over the original report.	
2016 Amended Q1, received 2/3/17	The Committee's report disclosed additional disbursements totaling \$11,402.92 on Schedule B supporting Lines 21(b) and 23, resulting in an increase of more than over the original report.	

Schedule B supporting Line 23 disclosed earmarked contributions forwarded to one (1) federal candidate totaling \$1,500.00. However, the Committee failed to disclose the original receipt of this earmarked contribution on Schedule A.

2016 Amended Q2, received 2/3/17 The Committee's report disclosed additional receipts totaling \$25,458.00 on Schedule A supporting Lines 11(a)(i), 11(a)(ii), and 16, and additional disbursements totaling \$22,349.02 on Schedule B supporting Lines 21(b) and 23, resulting in an increase of more than over the original report.

2016 Q3 Schedule B supporting Line 23 disclosed earmarked contributions forwarded to two (2) federal candidates totaling \$2,000.00. However, the Committee failed to disclose the original receipt of these earmarked contributions on Schedule A.

2016 Amended Q3 received 2/3/17 The Committee's report disclosed additional receipts totaling \$18,800.00 on Schedule A supporting Lines 11(a)(i), 11(a)(ii), and 16, and additional disbursements totaling \$25,791.23 on Schedule B supporting Lines 21(b), 23, and 29, resulting in an increase of more than over the original report.

2016 Amended 30G received 2/3/17 The Committee's report disclosed additional disbursements totaling \$14,544.08 on Schedule B supporting Lines 21(b) and 23, resulting in an increase of more than over the original report.

Standard 7 Total:

Points for Receipts	Points for Disbursements	Other Points

D. Standard 11 – Failure to Properly Itemize Disbursements:

Report Type	Violation (Description)	Points
2015 Amended YE, received 2/3/17	Schedule B supporting Line 21(b) failed to disclose the name and address of the original vendors for thirteen (13) of thirty-four (34) disbursements, or 38.2%.	

Standard 11 Total:

Points for Receipts	Points for Disbursements	Other Points

VIII. MATTERS REQUIRING REFERRAL TO OGC/ADRO:

A. OGC –

None.

B. ADRO –

None.

IX. OTHER COMMISSION ACTIONS DURING THE 2013-2014 AND 2015-2016 ELECTION CYCLES

(AF #3236): The Committee was assessed a civil money penalty of \$654.00 for failing to timely file the 2016 12 Day Pre-General Report.

X. OTHER RELEVANT INFORMATION:

None.

Cmte. ID: C00492579 Cmte. Name: AMERICAN PRINCIPLES												
Treasurer Name: LAOR, EYTAN Address: 20533 BISCAYNE BLVD #250, MIAMI, FL 33180												
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER												
Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	

No records were found for this cycle.

O-Index (2015-2016)												
Cmte. ID: C00492579 Cmte. Name: AMERICAN PRINCIPLES Treasurer Name: LAOR, EYTAN Address: 20533 BISCAYNE BLVD #250, MIAMI, FL 33180 Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER												
	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans
A	5/2/2017	2	201705020300085837	7/1/2015	12/31/2015	5/2/2017	-	-	-	-	-	-
N	7/26/2016	2	201607260300052978	1/1/2016	3/31/2016	7/26/2016	-	-	-	-	-	-
A	5/2/2017	2	201705020300085839	1/1/2016	3/31/2016	5/2/2017	-	-	-	-	-	-
A	5/2/2017	2	201705020300085841	4/1/2016	6/30/2016	5/2/2017	-	-	-	-	-	-
A	5/7/2017	2	201705070300086169	7/1/2016	9/30/2016	5/7/2017	-	-	-	-	-	-
N	1/12/2017	2	201701130300075601	7/1/2016	9/30/2016	1/12/2017	-	-	-	-	-	-
A	5/7/2017	2	201705070300086171	10/20/2016	11/28/2016	5/7/2017	-	-	-	-	-	-
N	7/31/2015	31	201507319000556455	1/1/2015	6/30/2015		\$40,236	\$58,617	\$32,745	\$66,108	-	-
A	2/3/2017	32	201702039042410808	1/1/2015	6/30/2015		\$40,215	\$58,600	\$32,727	\$66,087	-	-
N	1/31/2016	11	201601319005290787	7/1/2015	12/31/2015		\$66,108	\$10,000	\$3,813	\$72,295	-	-
A	2/3/2017	40	201702039042412848	7/1/2015	12/31/2015		\$66,087	\$26,086	\$50,302	\$41,871	-	-
N	4/15/2016	10	201604159012566952	1/1/2016	3/31/2016		\$78,433	\$7,600	\$6,544	\$79,489	-	-
A	2/3/2017	20	201702039042412888	1/1/2016	3/31/2016		\$41,871	\$15,850	\$17,947	\$39,774	-	-
N	7/15/2016	6	201607159020673215	4/1/2016	6/30/2016		\$79,489	\$0	\$500	\$78,989	-	-
A	2/3/2017	22	201702039042412908	4/1/2016	6/30/2016		\$39,774	\$25,458	\$22,849	\$42,383	-	-
N	10/15/2016	12	201610159032875516	7/1/2016	9/30/2016		\$24,289	\$0	\$6,250	\$18,039	-	-
A	2/3/2017	30	201702039042412940	7/1/2016	9/30/2016		\$42,383	\$18,800	\$32,041	\$29,142	-	-
N	12/8/2016	5	201612089040564924	10/1/2016	10/19/2016		\$18,039	\$0	\$29	\$18,010	-	-
A	2/3/2017	8	201702039042412970	10/1/2016	10/19/2016		\$29,142	\$1,000	\$1,796	\$28,345	-	-
N	12/8/2016	8	201612089040564954	10/20/2016	11/28/2016		\$18,010	\$16,750	\$0	\$34,760	-	-
A	2/3/2017	19	201702039042412978	10/20/2016	11/28/2016		\$28,345	\$25,050	\$14,544	\$38,851	-	-
N	2/3/2017	11	201702039042412997	11/29/2016	12/31/2016		\$38,851	\$2,100	\$3,337	\$37,614	-	-
A	2/14/2017	11	201702149049354759	11/29/2016	12/31/2016		\$38,851	\$2,100	\$3,937	\$37,014	-	-
								\$172,944	\$176,145			

O-Index (2013-2014)												
Cmte. ID: C00492579			Cmte. Name: AMERICAN PRINCIPLES									
Treasurer Name: LAOR, EYTAN			Address: 20533 BISCAYNE BLVD #250, MIAMI, FL 33180									
Cmte. Type: Q (QUALIFIED NON-PARTY)			Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER									
VI	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans
A	4/16/2015	2	15330080859	7/1/2014	9/30/2014	4/16/2015	-	-	-	-	-	-
N	7/29/2013	21	13964454261	1/1/2013	6/30/2013		\$51,526	\$25,348	\$32,385	\$44,489	-	-
A	8/1/2013	21	13941313556	1/1/2013	6/30/2013		\$51,526	\$25,348	\$32,385	\$44,489	-	-
A	8/15/2013	20	13964515655	1/1/2013	6/30/2013		\$51,526	\$25,348	\$32,885	\$43,989	-	-
N	1/31/2014	28	14940324381	7/1/2013	12/31/2013		\$43,989	\$63,350	\$28,530	\$78,808	-	-
N	4/15/2014	19	14960705976	1/1/2014	3/31/2014		\$78,808	\$15,000	\$23,196	\$70,612	-	-

A	10/26/2016	28	201610269034596314	4/1/2014	6/30/2014	\$70,612	\$28,575	\$30,301	\$68,885	-
N	10/16/2014	24	14978411067	7/1/2014	9/30/2014	\$68,885	\$8,700	\$27,099	\$50,486	-
A	10/17/2014	24	14978456885	7/1/2014	9/30/2014	\$68,885	\$8,700	\$27,591	\$49,994	-
A	2/3/2017	24	201702039042410753	7/1/2014	9/30/2014	\$68,885	\$8,700	\$27,612	\$49,973	-
N	10/17/2014	9	14978456911	10/1/2014	10/15/2014	\$49,994	\$750	\$5,303	\$45,441	-
A	10/17/2014	9	14978456920	10/1/2014	10/15/2014	\$49,994	\$750	\$6,303	\$44,441	-
A	2/3/2017	9	201702039042410777	10/1/2014	10/15/2014	\$49,973	\$750	\$6,303	\$44,420	-
N	12/3/2014	14	14952705914	10/16/2014	11/24/2014	\$44,441	\$6,000	\$10,441	\$40,000	-
A	2/3/2017	14	201702039042410786	10/16/2014	11/24/2014	\$44,420	\$6,000	\$10,441	\$39,979	-
A	1/29/2015	8	15950158127	11/25/2014	12/31/2014	\$40,000	\$3,000	\$2,763	\$40,236	-
N	1/29/2015	7	15950139353	11/25/2014	12/31/2014	\$40,000	\$3,000	\$2,263	\$40,736	-
A	2/3/2017	8	201702039042410800	11/25/2014	12/31/2014	\$39,979	\$3,000	\$2,763	\$40,215	-
A	7/29/2013	4	13964454287			-	-	-	-	-
						\$150,723	\$162,033			

Response Codes, Due Dates, and Receipt Dates for American Principles (C00492579)

Standard 4

Report	Response Code	Description	Due Date	Response Date	Points
2016 12G	N/A	Failure to Timely File Report (U4-0)	N/A	N/A	

Standard 6

Report	Response Code	Description	Due Date	Response Date	Points
2016 Q1	LAR	Cash Discrepancy (U6-11)	8/30/16	2/3/17	

Standard 7

Report	Response Code	Description	Due Date	Response Date	Points
2015 Amended YE, received 2/3/17	NR	Clarify Increase in Activity for Amendment Filed (U7-58)	6/6/17	N/A	
2016 Amended Q1, received 2/3/17	NR	Clarify Increase in Activity for Amendment Filed (U7-58) Earmarked Contributions on Schedule B Not on Schedule A (U7-57)	6/6/17	N/A	
2016 Amended Q2, received 2/3/17	NR	Clarify Increase in Activity for Amendment Filed (U7-58)	6/6/17	N/A	
2016 Q3	IR	Earmarked Contributions on Schedule B Not on Schedule A (U7-57)	2/16/17	2/3/17	
2016 Amended Q3, received 2/3/17	NR	Clarify Increase in Activity for Amendment Filed (U7-58)	6/12/17	N/A	
2016 Amended 30G, received 2/3/17	NR	Clarify Increase in Activity for Amendment Filed (U7-58)	6/12/17	N/A	

Standard 11

Report	Response Code	Description	Due Date	Response Date	Points
2015 Amended YE, received 2/3/17	NR	Credit Card Payments on Schedule B (U11-2)	6/6/17	N/A	

**American Principles
(C00492579)**

1. List of Affiliated Committees:

None.

2. List of Pseudonyms:

None.

3. Coordinated Expenditure Report:

None.

4. List of 24/48-Hour Reports Filed:

None.