

RAD REFERRAL #: A17-12

DATE: July 13, 2017

ANALYST: Nicole Miller

REPORTS ANALYSIS AUDIT REFERRAL

I. COMMITTEE: Hispanic Victory PAC
C00614453
Jesus D. Sanchez Canete, Treasurer
1717 Pennsylvania Avenue, Unit 1025
Washington, DC 20006

TYPE OF COMMITTEE: Nonconnected (Independent Expenditure-Only Committee)

II. REGISTRATION DATE: April 11, 2016

III. MULTICANDIDATE STATUS: Non-Qualified

IV. TOTAL POINTS ASSESSED:

V. SUMMARY OF AUDIT POINTS BY STANDARD:

Standard	#	Description
Standard	4	Failure to File Reports and Late Filing
Standard	7	Failure to Provide Supporting Schedules
Standard	8	Failure to Properly Itemize Contributions from Individuals
Standard	14	Independent Expenditure Reporting Problems – Political Committees (Form 3X)
		TOTAL

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 Q2	7/15/2016	9/27/2016

Standard 4 Total:

B. Standard 7 - Failure to Provide Supporting Schedules:

Report Type	Violation (Description)
2016 Q2	The Committee failed to timely file a required 48-Hour Report for \$14,822.66 in independent expenditures disclosed on Schedule E.
2016 Q3	The Committee failed to file a required 48-Hour Report for \$64,647.18 in independent expenditures disclosed on Schedule E.
2016 Amended 12G, received 2/15/17	<p>The Committee's report disclosed additional receipts totaling \$70,748.45 on Schedule A supporting Lines 11(a)(i) and 11(a)(ii) and additional disbursements totaling \$50,158.85 on Schedule B supporting Lines 21(b) and 24, resulting in an increase of more than 5% and \$10,000.00 over the original report.</p> <p>The Committee failed to timely file a required 48-Hour Report for \$30,636.13 in independent expenditures disclosed on Schedule E.</p>
2016 Amended 30G, received 2/16/17	<p>The Committee's report disclosed additional disbursements totaling \$14,437.25 on Schedule B supporting Lines 21(b) and 24, resulting in an increase of more than 5% and \$10,000.00 over the original report.</p> <p>The Committee failed to timely file a required 24-Hour Report for \$5,040.00 in independent expenditures disclosed on Schedule E.</p>

Standard 7 Total:

C. Standard 8 - Failure to Properly Itemize Contributions from Individuals:

Report Type	Violation (Description)
2016 Q3	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 31 of 71, or 43.7%, of the contributions from individuals that require itemization.

Standard 8 Total:

D. Standard 14 - Independent Expenditure Reporting Problems – Political Committees (Form 3X):

Report Type	Violation (Description)
2016 Q2	The Committee failed to clarify \$4,519.05 in independent expenditures made where there were date of disbursement discrepancies between the 48-Hour Report entries and the entries disclosed on Schedule E.

Standard 14 Total:

VIII. MATTERS REQUIRING REFERRAL TO OGC/ADRO:

A. OGC –

None.

B. ADRO –

Failure to Provide Supporting Schedules (Standard 7)

The Committee can be referred to the Alternative Dispute Resolution Office (ADRO) for amending the 2016 12 Day Pre-General Report to disclose additional receipts totaling \$70,748.45 and additional disbursements totaling \$50,158.85 from the original report.

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

2016 October Quarterly Report

During the 2015-2016 election cycle, the Committee was referred to ADRO on the 2016 October Quarterly Report for failing to file two (2) 48-Hour Reports to support six (6) independent expenditures disclosed on Schedule E, supporting Line 24, totaling \$64,647.18 made in opposition to one (1) federal candidate for the 2016 General Election.

2016 12 Day Pre-General Report

The Committee submitted an Amended 2016 12 Day Pre-General Report on April 20, 2017. Review of this amendment revealed potential violations under Standard 7 (Failure to Provide Supporting Schedules) for which a Request for Additional Information (RAI) was sent to the Committee. Due to time constraints of the audit referral, these potential violations were not included in this referral.

X. OTHER RELEVANT INFORMATION:

None.

Cmte. ID: C00614453 Cmte. Name: HISPANIC VICTORY PAC Treasurer Name: JESUS D SANCHEZ CANETE Address: 1717 PENSILVANIA AVENUE UNIT 1025, WASHINGTON, DC 20006 Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) 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
1/6/2017	5	201701069040974398				-	-	-	-	-	-
2/13/2017	1	201702139049344874				-	-	-	-	-	-
2/13/2017	1	201702139049345220				-	-	-	-	-	-
2/13/2017	1	201702139049345228				-	-	-	-	-	-
							\$0		\$0		

O-Index (2015-2016) Cmte. ID: C00614453 Cmte. Name: HISPANIC VICTORY PAC Treasurer Name: JESUS D SANCHEZ CANETE Address: 1717 PENSILVANIA AVENUE UNIT 1025, WASHINGTON, DC 20006 Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) 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
11/3/2016	3	201611030300067698	4/1/2016	6/30/2016	11/3/2016	-	-	-	-	-	-
8/2/2016	2	201608020300055620	4/1/2016	6/30/2016	8/2/2016	-	-	-	-	-	-
11/17/2016	4	201611170300068560	7/1/2016	9/30/2016	11/17/2016	-	-	-	-	-	-
2/6/2017	2	201702070300077136	7/1/2016	9/30/2016	2/6/2017	-	-	-	-	-	-
4/4/2017	3	201704040300083519	10/1/2016	10/19/2016	4/4/2017	-	-	-	-	-	-
5/11/2017	2	201705110300086431	10/1/2016	10/19/2016	5/11/2017	-	-	-	-	-	-
4/4/2017	3	201704040300083516	10/20/2016	11/28/2016	4/4/2017	-	-	-	-	-	-
9/27/2016	22	201609279032139725	4/1/2016	6/30/2016		\$0	\$26,892	\$22,345	\$4,546	\$966	
1/6/2017	21	201701069040982955	4/1/2016	6/30/2016		\$0	\$26,892	\$22,345	\$4,546	-	
10/14/2016	45	201610149032465167	7/1/2016	9/30/2016		\$4,546	\$138,668	\$87,295	\$55,920	\$50,430	
1/10/2017	37	201701109041355365	7/1/2016	9/30/2016		\$4,546	\$138,668	\$87,295	\$55,920	-	
2/13/2017	46	201702139049345554	7/1/2016	9/30/2016		\$4,546	\$138,668	\$87,295	\$55,920	\$50,430	
10/27/2016	17	201610279036875091	10/1/2016	10/19/2016		\$4,546	\$0	\$20,383	(\$15,836)	\$50,430	
1/10/2017	41	201701109041361407	10/1/2016	10/19/2016		\$55,920	\$70,748	\$60,286	\$66,381	-	
2/15/2017	51	201702159049696525	10/1/2016	10/19/2016		\$55,920	\$70,748	\$70,542	\$56,126	\$50,430	
4/18/2017	51	201704189052309822	10/1/2016	10/19/2016		\$55,920	\$70,748	\$70,542	\$56,126	\$100,860	
4/20/2017	41	201704209052340945	10/1/2016	10/19/2016		\$55,920	\$70,748	\$70,542	\$56,126	\$123	
12/8/2016	17	201612089039945879	10/20/2016	11/28/2016		\$66,381	\$8,740	\$21,180	\$53,941	\$50	
2/16/2017	22	201702169049701240	10/20/2016	11/28/2016		\$56,126	\$8,842	\$35,617	\$29,351	\$100	
4/20/2017	23	201704209052365918	10/20/2016	11/28/2016		\$56,126	\$8,842	\$35,617	\$29,351	\$100	
1/31/2017	18	201701319042251126	11/29/2016	12/31/2016		\$66,381	\$6,791	\$20,725	\$52,447	\$6,169	
2/16/2017	19	201702169049701588	11/29/2016	12/31/2016		\$29,351	\$6,791	\$22,725	\$13,416	\$6,169	
4/24/2017	20	201704249053475441	11/29/2016	12/31/2016		\$29,351	\$6,791	\$22,725	\$13,416	\$6,219	
4/11/2016	7	201604110300061620				-	-	-	-	-	
10/18/2016	1	201610189033022678				-	-	-	-	-	
11/10/2016	2	201611109037140313				-	-	-	-	-	
9/27/2016	2	201609279032139747				-	-	-	-	-	
9/27/2016	2	201609279032139749				-	-	-	-	-	
9/27/2016	5	201609279032139751				-	-	-	-	-	
9/27/2016	2	201609279032139756				-	-	-	-	-	
9/27/2016	2	201609279032139762				-	-	-	-	-	
9/27/2016	1	201609279032139764				-	-	-	-	-	

**Response Codes, Due Dates, and Receipt Dates for
Hispanic Victory PAC
(C00614453)**

Standard 4

Report	Response Code	Description	Due Date	Response Date
2016 Q2	N/A	Failure to Timely File Report (RQ-7)	N/A	N/A

Standard 7

Report	Response Code	Description	Due Date	Response Date
2016 Q2	LIR	Missing 48-Hour Report for Independent Expenditures (U7-43)	12/8/16	1/6/17
2016 Q3	LIR	Missing 48-Hour Report for Independent Expenditures (U7-43)	12/22/16	1/10/17
2016 Amended 12G, received 2/15/17	IR	Clarify Increase in Activity for Amendment Filed (U7-58)	5/9/17	4/20/17
		Missing 48-Hour Report for Independent Expenditures (U7-43)		
2016 Amended 30G, received 2/16/17	IR	Clarify Increase in Activity for Amendment Filed (U7-58)	5/9/17	4/20/17
		Missing 24-Hour Report for Independent Expenditures (U7-42)		

Standard 8

Report	Response Code	Description	Due Date	Response Date
2016 Q3	LAR	Occupation/Name of Employer Omitted (U8-1)	12/22/16	1/10/17

Standard 14

Report	Response Code	Description	Due Date	Response Date
2016 Q2	LAR	Inconsistent Amounts and Dates on Notice and Schedule E (U14-4)	12/8/16	1/6/17

**Hispanic Victory PAC
(C00614453)**

1. List of Affiliated Committees:

None.

2. List of Pseudonyms:

None.

3. Coordinated Expenditure Report:

None.

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

Type	Date Filed	Image Number
48-Hour Report	9/27/16	201609279032139747
48-Hour Report	9/27/16	201609279032139749
48-Hour Report	9/27/16	201609279032139751
48-Hour Report	9/27/16	201609279032139756
48-Hour Report	9/27/16	201609279032139762
48-Hour Report	9/27/16	201609279032139764
48-Hour Report	10/7/16	201610079032195696
48-Hour Report	10/18/16	201610189033022678
24-Hour Report	10/26/16	201610269034623098
24-Hour Report	10/27/16	201610279034653508
48-Hour Report	11/10/16	201611109037140313
48-Hour Report	1/6/17	201701069040974398
48-Hour Report	2/13/17	201702139049344874
24-Hour Report	2/13/17	201702139049345220
24-Hour Report	2/13/17	201702139049345228