

**RAD REFERRAL #: A17-14**

**DATE:** July 13, 2017

**ANALYST:** Michael Adamsky

**REPORTS ANALYSIS AUDIT REFERRAL**

**I. COMMITTEE:** Make America Great Again  
C00580373  
Leslie Caldwell, Treasurer  
208 East 51<sup>st</sup> Street, Suite 157  
New York, NY 10022

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

**II. REGISTRATION DATE:** June 30, 2015

**III. MULTICANDIDATE STATUS DATE:** 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	6	Mathematical Discrepancies
Standard	8	Failure to Properly Itemize Contributions from Individuals
Standard	11	Failure to Properly Itemize Disbursements
		<b>TOTAL</b>

**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 Q1	4/15/16	7/6/16
2016 Q3	10/15/16	N/A
2016 30G	12/8/16	1/4/17
2016 YE	1/31/17	2/24/17

Standard 4 Total:

### B. Standard 6 - Mathematical Discrepancies:

Report Type	Violation (Description)
2015 YE	Schedule B supporting Line 21(b) disclosed memo entries totaling \$36,536.58 that did not appear to correspond with any itemized transaction(s).
2016 Q1	The beginning cash balance, \$0.00, was less than the ending cash balance on the previous report, \$157,714.61, a discrepancy of \$157,714.61.

Standard 6 Total:

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

Report Type	Violation (Description)
2015 YE	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 37 of 45, or 82.2%, of the contributions from individuals that require itemization.

Standard 8 Total:

**D. Standard 11 – Failure to Properly Itemize Disbursements:**

Report Type	Violation (Description)
2015 YE	Schedule B supporting Line 21(b) disclosed \$244,375.39 in entries with inadequate or missing information as detailed below:  Schedule B supporting Line 21(b) failed to disclose an adequate purpose of disbursement to five (5) vendors totaling \$227,500.00.  Schedule B supporting Line 21(b) failed to disclose the purpose for forty-eight (48) disbursements totaling \$16,875.39.

**Standard 11 Total:**

**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 # 3068): The Committee was assessed a civil money penalty of \$275.00 for failure to timely file the 2016 April Quarterly Report.

**X. OTHER RELEVANT INFORMATION:**

None.

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
O-Index (2017-2018)															
Cmte. ID: C00580373 Cmte. Name: MAKE AMERICA GREAT AGAIN															
Treasurer Name: LESLIE CALDWELL Address: 208 EAST 51ST STREET SUITE 157, NEW YORK, NY 10022															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															

No records were found for this cycle.

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
O-Index (2015-2016)															
Cmte. ID: C00580373 Cmte. Name: MAKE AMERICA GREAT AGAIN															
Treasurer Name: LESLIE CALDWELL Address: 208 EAST 51ST STREET SUITE 157, NEW YORK, NY 10022															
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MS-T			5/9/2016	5	201605130300074142										
MS-N			5/31/2016	1	201605310300047978										
RQ2	YE	N	3/22/2016	3	201603220300040134	7/1/2015	12/31/2015	3/22/2016							
RQ7	Q1		5/3/2016	2	201605040300044581	1/1/2016	3/31/2016	5/3/2016							
RQ2	Q1	N	7/19/2016	2	201607190300052642	1/1/2016	3/31/2016	7/19/2016							
RQ2	TER	T	7/19/2016	2	201607190300052644	4/1/2016	6/30/2016	7/19/2016							
RQ2	TER	A	9/20/2016	2	201609200300058808	4/1/2016	7/31/2016	9/20/2016							
RQ7	Q3		10/31/2016	2	201610310300066078	8/1/2016	9/30/2016	10/31/2016							
RQ7	30G		12/28/2016	2	201612280300072668	10/1/2016	11/28/2016	12/28/2016							
RQ7	YE		2/16/2017	2	201702160300079587	11/29/2016	12/31/2016	2/16/2017							
F3XN	YE	N	2/3/2016	58	201602039008436810	7/1/2015	12/31/2015		\$0	\$1,732,684	\$1,584,969	\$147,714			\$0
F3XA	YE	A	5/23/2016	58	201605239017284552	7/1/2015	12/31/2015		\$0	\$1,742,684	\$1,584,969	\$157,714			\$0
F3XN	Q1	N	7/8/2016	6	20160708020343574	1/1/2016	3/31/2016		\$0	\$0	\$3,525	(\$3,525)			\$0
F3XA	Q1	A	9/9/2016	6	20160909030765612	1/1/2016	3/31/2016		\$157,714	\$0	\$3,525	\$154,189			\$0
F3XT	TER	T	7/8/2016	5	20160708020343612	4/1/2016	6/30/2016		(\$3,525)	\$0	\$0	(\$3,525)			\$0
F3XA	TER	A	9/9/2016	6	20160909030765621	4/1/2016	7/31/2016		\$154,189	\$0	\$122	\$154,067			\$0
F3XN	12G	N	1/4/2017	5	201701049040916125	10/1/2016	10/19/2016		\$48,363	\$0	\$0	\$48,363			\$0
F3XN	30G	N	1/4/2017	5	201701049040916130	10/20/2016	11/28/2016		\$48,363	\$0	\$0	\$48,363			\$0
F3XN	YE	N	2/24/2017	5	201702249050504007	11/29/2016	12/31/2016		\$48,363	\$0	\$0	\$48,363			\$0
F1		N	6/30/2015	7	201507010300005042										
Totals										\$1,742,684	\$1,588,616				

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
O-Index (2013-2014)															
Cmte. ID: C00580373 Cmte. Name: MAKE AMERICA GREAT AGAIN															
Treasurer Name: LESLIE CALDWELL Address: 208 EAST 51ST STREET SUITE 157, NEW YORK, NY 10022															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															

No records were found for this cycle.

**Response Codes, Due Dates, and Receipt Dates for  
Make America Great Again  
(C00580373)**

**Standard 4**

Report	Response Code	Description	Due Date	Response Date
2016 Q1	N/A	Failure to Timely File Report (RQ-7)	N/A	N/A
2016 Q3	N/A	Failure to Timely File Report (RQ-7)	N/A	N/A
2016 30G	N/A	Failure to Timely File Report (RQ-7)	N/A	N/A
2016 YE	N/A	Failure to Timely File Report (RQ-7)	N/A	N/A

**Standard 6**

Report	Response Code	Description	Due Date	Response Date
2015 YE	LIR	Memo Entries Do Not Correspond with any Transaction (U6-31)	4/26/16	5/23/16
2016 Q1	LAR	Cash Discrepancy (U6-11)	8/23/16	9/9/16

**Standard 8**

Report	Response Code	Description	Due Date	Response Date
2015 YE	LAR	Occupation/Name of Employer Omitted (U8-1)	4/26/16	5/23/16

**Standard 11**

Report	Response Code	Description	Due Date	Response Date
2015 YE	LAR	Inadequate Purpose (U11-1)	4/26/16	5/23/16
		Omitted Information (U11-3)		

**Make America Great Again  
(C00580373)**

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.