

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 20, 2017

ANALYST: Quy Vuong

- I. COMMITTEE:
- Minnesota Democratic-Farmer-Labor
Party
C00025254
Tyler Moroles, Treasurer (3/11/17-
Present)
Ronald F. Harris, Jr., Treasurer (2/16/15-
3/10/17)
Thomas Hamilton, Treasurer (2/9/11-
2/15/15)
255 Plato Blvd E
St. Paul, MN 55107
- 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)

Minnesota Democratic-Farmer-Labor Party ("the Committee") amended its 2016 Year-End Report to disclose additional disbursements totaling \$229,415.93, which were not disclosed on the original report (Attachment 2).

On January 31, 2017, the Committee filed the original 2016 Year-End Report covering the period from November 29, 2016 through December 31, 2016. The report disclosed \$31,405.59 in disbursements on Line 21(a)(i) (Allocated Federal/Non-Federal Activity, Federal Share), \$80,729.95 in disbursements on Line 21(a)(ii) (Allocated Federal/Non-Federal Activity, Non-Federal Share), \$101,939.82 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$0.00 in disbursements on Line 22 (Transfers to Affiliated/Other Party Committees), and \$103,424.88 in disbursements on

Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds) of the Detailed Summary Page (Image 201701319042386687).

On February 8, 2017, the Committee filed an amended 2016 Year-End Report. The report disclosed \$43,464.55 in disbursements on Line 21(a)(i), \$102,239.61 in disbursements on Line 21(a)(ii), \$148,198.17 in disbursements on Line 21(b), \$15,436.21 in disbursements on Line 22, and \$237,577.63 in disbursements on Line 30(b) of the Detailed Summary Page, a total increase in disbursements of \$229,415.93 from the original report (Image 201702089045576910).

On May 4, 2017, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2016 Year-End Report, received February 8, 2017. Among other items, the RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2016 Year-End Report (Image 201705040300086062).

On June 1, 2017, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI referencing the Amended 2016 Year-End Report, received February 8, 2017. The Committee stated, in part:

"Due to unforeseen medical circumstances of staff assisting with the preparation of the report, and an unusually large amount of data required to be entered due to the large amount of general election campaign activity, an unexpected delay in the compilation and entry of data for the report occurred. The report was amended as soon as the compilation and data entry could be completed" (Image 201706019055168459).

On July 20, 2017, the Reports Analysis Division (RAD) Analyst called Libby Keefe, Comptroller for the Committee. The Analyst left a message for Ms. Keefe stating that the Committee is being referred for additional action for matters addressed in the RFAI referencing the 2016 Amended Year-End Report. The Analyst requested a return call so that the matter could be discussed in further detail (Attachment 3).

Subsequently on July 20, 2017, Ms. Keefe returned the Analyst's call. The Analyst informed Ms. Keefe that the increase in activity disclosed on the Committee's 2016 Amended Year-End Report may be referred for further action. The Analyst further explained that the purpose of the call was to give the Committee the opportunity to put additional information on the public record, if they choose to do so. Ms. Keefe said the Committee would have legal counsel respond to the issue (Attachment 3).

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

O-Index (2017)

Cmte. ID: C00025254 Cmte. Name: MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY

Treasurer Name: MOROLES, TYLER Address: 255 PLATO BLVD E, ST PAUL, MN 55107

Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Inq#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			6/1/2017	1	201706019055168459		12/31/2016		-	-	-	-	-	-	-
MS-T			6/6/2017	4	20170606300158456	11/29/2016	5/31/2017	8/27/2017	-	-	-	-	-	-	-
RQ2	M6	N	8/27/2017	2	201708270300092442	5/1/2017	1/31/2017		2272,826	\$187,894	\$273,726	\$186,995	\$35,266	-	\$35,266
F3XN	M2	N	2/20/2017	74	2017020209049729840	1/1/2017	1/31/2017		186,995	\$116,010	\$180,463	\$122,542	\$29,199	-	\$29,199
F3XN	M3	N	3/20/2017	107	2017030209050959770	2/1/2017	2/28/2017		122,542	\$134,117	\$177,370	\$79,289	\$68,241	-	\$68,241
F3XN	M4	N	4/20/2017	100	2017042009052335371	3/1/2017	3/31/2017		79,289	\$188,734	\$164,712	\$103,311	\$114,315	-	\$114,315
F3XN	M5	N	5/19/2017	99	201705190504038492	4/1/2017	4/30/2017		103,311	\$192,955	\$198,794	\$97,473	\$142,533	-	\$142,533
F3XN	M6	N	6/20/2017	113	2017062009063527273	5/1/2017	5/31/2017		192,955	\$254,142	\$284,433	\$67,181	\$121,554	-	\$121,554
F3XN	M7	N	7/20/2017	142	2017072009071284046	6/1/2017	6/30/2017		254,142	\$254,142	\$284,433	\$67,181	\$121,554	-	\$121,554
F3XN	M8	N	8/19/2017	173	20170819070473590	7/1/2017	7/31/2017		289,389	\$299,128	\$254,716	\$289,389	\$62,599	-	\$62,599
F3XN	M9	N	9/19/2017	119	201709190704761993	8/1/2017	8/31/2017		382,982	\$310,092	\$364,656	\$328,418	\$15,455	-	\$15,455
F3XN	M10	N	10/16/2017	154	201710160705761680	9/1/2017	9/30/2017		-	-	-	-	-	-	-
F1A		A	1/1/2017	13	201701119041370979				-	-	-	-	-	-	-
F1A		A	10/18/2017	10	201710180705790362				-	-	-	-	-	-	-
F1A		A	3/1/2017	12	201703119050765022				-	-	-	-	-	-	-
F1A		A	10/25/2017	11	201710259076673919				-	-	-	-	-	-	-
Totals										\$2,200,000	\$2,144,409				

O-Index (2015-2016)

Cmte. ID: C00025254 Cmte. Name: MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY

Treasurer Name: MOROLES, TYLER Address: 255 PLATO BLVD E, ST PAUL, MN 55107

Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Inq#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			4/15/2015	19	15031413437				-	-	-	-	-	-	-
MS-T			6/17/2015	1	15951482665				-	-	-	-	-	-	-
MS-T			6/17/2015	1	15971210820				-	-	-	-	-	-	-
MS-T			11/18/2015	1	201511189003365690				-	-	-	-	-	-	-
MS-T			5/31/2016	1	201605319017320895				-	-	-	-	-	-	-
RQ2	M2	N	6/1/2015	2	15330083560	1/1/2015	1/31/2015	6/7/2015	128,080	\$218,853	\$295,526	\$51,407	\$485,306	-	\$485,306
RQ2	M4	N	6/7/2015	2	15330083562	3/1/2015	3/31/2015	6/7/2015	51,407	\$168,224	\$148,679	\$70,952	\$471,967	-	\$471,967
RQ2	M7	N	11/2/2015	2	201511020300006511	6/1/2015	6/30/2015	11/2/2015	70,952	\$600,626	\$422,921	\$248,657	\$176,212	\$175,000	\$351,212
RQ2	YE	A	5/4/2017	3	20170504030008062	11/29/2016	12/31/2016	5/4/2017	70,952	\$600,626	\$422,921	\$248,657	\$188,512	\$175,000	\$351,212
F3XN	M2	N	2/17/2015	89	15970267765	1/1/2015	1/31/2015		248,657	\$225,785	\$322,163	\$152,279	\$48,396	\$175,000	\$223,396
F3XN	M3	N	3/18/2015	118	15950875535	2/1/2015	2/28/2015		248,657	\$225,785	\$322,163	\$152,279	\$48,396	\$175,000	\$223,396
F3XN	M4	N	4/17/2015	128	15951181470	3/1/2015	3/31/2015		152,279	\$250,859	\$248,790	\$154,347	\$46,985	\$173,689	\$220,675
F3XN	M4	N	6/17/2015	128	15951484763	3/1/2015	3/31/2015		152,279	\$250,859	\$248,790	\$154,347	\$46,985	\$173,689	\$220,675
F3XN	M5	N	5/19/2015	144	15951398168	4/1/2015	4/30/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M5	N	5/19/2015	144	15951398168	4/1/2015	4/30/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M6	N	6/17/2015	137	15951485711	5/1/2015	5/31/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M6	N	6/17/2015	137	15951485711	5/1/2015	5/31/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M6	N	11/18/2015	136	201511189003366072	5/1/2015	5/31/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M6	N	5/31/2016	138	201605319017318330	5/1/2015	5/31/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M7	N	7/16/2015	134	201507169000241657	6/1/2015	6/30/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M7	N	11/18/2015	131	201511189003366225	6/1/2015	6/30/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143
F3XN	M7	N	5/31/2016	131	201605319017318468	6/1/2015	6/30/2015		154,347	\$353,084	\$263,083	\$244,328	\$34,121	\$172,021	\$206,143

F3XN	M8	N	8/19/2015	129	20150819800085739	7/1/2015	7/31/2015	\$244,328	\$159,037	\$140,987	\$262,379	\$27,964	\$170,316	\$198,281
F3XA	M8	A	11/18/2015	129	201511198003367455	7/1/2015	7/31/2015	\$244,328	\$159,037	\$140,987	\$262,379	\$27,964	\$170,316	\$198,281
F3XA	M8	A	12/17/2015	129	201512179004292615	7/1/2015	7/31/2015	\$244,328	\$159,037	\$140,987	\$262,379	\$27,964	\$170,316	\$198,281
F3XA	M8	A	5/31/2016	129	201605319017318606	7/1/2015	7/31/2015	\$244,328	\$159,037	\$140,987	\$262,379	\$27,964	\$170,316	\$198,281
F3XN	M9	N	9/16/2015	125	201509169002679107	8/1/2015	8/31/2015	\$262,379	\$176,752	\$155,952	\$283,180	\$22,964	\$168,631	\$191,596
F3XA	M9	A	11/18/2015	125	201511189003367679	8/1/2015	8/31/2015	\$262,379	\$176,752	\$155,952	\$283,180	\$22,964	\$168,631	\$191,596
F3XA	M9	A	12/17/2015	125	201512179004292744	8/1/2015	8/31/2015	\$262,379	\$176,752	\$155,952	\$283,180	\$22,964	\$168,631	\$191,596
F3XA	M9	A	5/31/2016	126	201605319017319167	8/1/2015	8/31/2015	\$262,379	\$176,752	\$155,952	\$283,180	\$22,964	\$168,631	\$191,596
F3XN	M10	N	10/15/2015	122	201510159002918895	9/1/2015	9/30/2015	\$283,180	\$190,492	\$220,968	\$252,704	\$30,547	\$166,881	\$197,429
F3XA	M10	A	11/18/2015	122	201511189003371829	9/1/2015	9/30/2015	\$283,180	\$190,492	\$220,968	\$252,704	\$30,547	\$166,881	\$197,429
F3XA	M10	A	12/17/2015	122	201512179004292869	9/1/2015	9/30/2015	\$283,180	\$190,492	\$220,968	\$252,704	\$30,547	\$166,881	\$197,429
F3XA	M10	A	5/31/2016	122	201605319017319423	9/1/2015	9/30/2015	\$283,180	\$190,492	\$220,968	\$252,704	\$30,547	\$166,881	\$197,429
F3XN	M11	N	11/18/2015	112	201511189003371602	10/1/2015	10/31/2015	\$252,704	\$107,241	\$145,747	\$214,198	\$23,267	\$165,151	\$188,419
F3XA	M11	A	12/3/2015	119	201512039004145992	10/1/2015	10/31/2015	\$252,704	\$107,241	\$145,747	\$214,198	\$23,267	\$165,151	\$188,419
F3XA	M11	A	12/14/2015	119	201512149004180308	10/1/2015	10/31/2015	\$252,704	\$107,241	\$145,747	\$214,198	\$23,267	\$165,151	\$188,419
F3XA	M11	A	12/17/2015	119	201512179004292991	10/1/2015	10/31/2015	\$252,704	\$107,241	\$145,747	\$214,198	\$23,267	\$165,151	\$188,419
F3XA	M11	A	5/31/2016	119	201605319017319545	10/1/2015	10/31/2015	\$252,704	\$107,241	\$145,747	\$214,198	\$23,267	\$165,151	\$188,419
F3XA	M11	A	5/31/2016	119	201605319017319786	10/1/2015	10/31/2015	\$252,704	\$107,241	\$145,747	\$214,198	\$23,267	\$165,151	\$188,419
F3XN	M12	N	12/18/2015	95	201512189004317760	11/1/2015	11/30/2015	\$214,198	\$140,768	\$186,350	\$168,616	\$29,159	\$163,440	\$192,600
F3XA	M12	A	5/31/2016	95	201605319017320507	11/1/2015	11/30/2015	\$214,198	\$140,768	\$186,350	\$168,616	\$29,159	\$163,440	\$192,600
F3XN	YE	N	1/29/2016	260	201601299004766678	12/1/2015	12/31/2015	\$168,616	\$406,309	\$211,518	\$363,407	\$3,566	\$161,665	\$165,231
F3XA	YE	A	5/31/2016	264	201605319017320612	12/1/2015	12/31/2015	\$168,616	\$406,309	\$211,518	\$363,407	\$3,566	\$161,665	\$165,231
F3XN	M2	N	2/17/2016	142	201602179008475065	1/1/2016	1/31/2016	\$363,407	\$389,665	\$358,906	\$394,166	\$10,534	\$159,936	\$170,470
F3XA	M2	A	5/31/2016	144	201605319017323468	1/1/2016	1/31/2016	\$363,407	\$389,665	\$358,906	\$394,166	\$10,534	\$159,936	\$170,470
F3XA	M2	A	5/31/2016	144	201605319017323612	1/1/2016	1/31/2016	\$363,407	\$389,665	\$358,906	\$394,166	\$10,534	\$159,936	\$170,470
F3XN	M3	N	3/18/2016	143	201603189009812844	2/1/2016	2/29/2016	\$394,166	\$383,343	\$413,890	\$363,619	\$0	\$158,118	\$158,118
F3XA	M3	A	5/31/2016	143	201605319017323757	2/1/2016	2/29/2016	\$394,166	\$383,343	\$413,890	\$363,619	\$0	\$158,118	\$158,118
F3XA	M4	N	4/19/2016	121	201604199012596737	3/1/2016	3/31/2016	\$363,619	\$283,657	\$340,721	\$306,556	\$5,574	\$58,883	\$64,458
F3XA	M4	A	5/31/2016	121	201605319017323900	3/1/2016	3/31/2016	\$363,619	\$283,657	\$340,721	\$306,556	\$5,574	\$58,883	\$64,458
F3XN	M5	N	5/20/2016	156	201605209015586741	4/1/2016	4/30/2016	\$306,556	\$367,981	\$337,845	\$336,691	\$3,630	\$41,753	\$45,383
F3XA	M5	A	5/31/2016	156	201605319017324457	4/1/2016	4/30/2016	\$306,556	\$367,981	\$337,845	\$336,691	\$3,630	\$41,753	\$45,383
F3XN	M6	N	6/20/2016	151	201606209018463565	5/1/2016	5/31/2016	\$336,691	\$435,309	\$390,883	\$381,117	\$0	\$39,443	\$39,443
F3XN	M7	N	7/20/2016	219	201607209020741234	6/1/2016	6/30/2016	\$381,117	\$521,505	\$453,581	\$449,041	\$0	\$37,076	\$37,076
F3XN	M8	N	8/18/2016	302	201608189022533333	7/1/2016	7/31/2016	\$449,041	\$841,688	\$814,957	\$475,772	\$0	\$24,697	\$24,697
F3XN	M9	N	9/20/2016	298	201609209032014775	8/1/2016	8/31/2016	\$475,772	\$1,032,616	\$892,885	\$815,503	\$0	\$0	\$0
F3XN	M10	N	10/20/2016	432	201610209034475545	9/1/2016	9/30/2016	\$815,503	\$1,916,045	\$1,513,080	\$1,218,467	\$0	\$0	\$0
F3XN	12G	N	10/28/2016	934	201610289037002128	10/1/2016	10/19/2016	\$1,218,467	\$3,196,978	\$3,346,441	\$1,069,004	\$0	\$0	\$0
F3XA	12G	A	1/23/2017	938	201701239041443145	10/1/2016	10/19/2016	\$1,218,467	\$3,196,978	\$3,346,441	\$1,070,034	\$10,261	\$10,261	\$10,261
F3XA	12G	A	4/1/2017	941	201704019051903072	10/1/2016	10/19/2016	\$1,218,467	\$3,196,978	\$3,346,441	\$1,070,034	\$10,361	\$10,361	\$10,361
F3XN	30G	N	12/9/2016	915	201612099040591964	10/20/2016	11/28/2016	\$1,069,004	\$1,834,439	\$2,320,459	\$582,983	\$3,300	\$3,300	\$3,300
F3XA	30G	A	1/24/2017	928	201701249041463184	10/20/2016	11/28/2016	\$1,070,034	\$1,834,449	\$2,321,136	\$583,347	\$16,375	\$16,375	\$16,375
F3XA	30G	A	2/4/2017	926	201702049042413073	10/20/2016	11/28/2016	\$1,070,034	\$1,834,449	\$2,321,136	\$583,347	\$16,375	\$16,375	\$16,375
F3XA	30G	A	4/1/2017	928	201704019051904013	10/20/2016	11/28/2016	\$1,070,034	\$1,834,449	\$2,321,136	\$583,347	\$16,375	\$16,375	\$16,375
F3XN	YE	N	1/31/2017	141	201701319042386684	11/29/2016	12/31/2016	\$583,347	\$181,690	\$320,800	\$444,237	\$13,075	\$13,075	\$13,075
F3XA	YE	A	2/8/2017	232	201702089045576907	11/29/2016	12/31/2016	\$583,347	\$239,695	\$550,216	\$272,826	\$21,630	\$21,630	\$21,630
F1A		A	2/17/2015	12	15950621011			-	-	-	-	-	-	-
F1A		A	2/16/2015	12	15950619555			-	-	-	-	-	-	-
F1A		A	11/7/2016	14	201611079037133686			-	-	-	-	-	-	-
F1A		A	12/20/2016	14	201612209040691508			-	-	-	-	-	-	-
F1A		A	3/17/2016	14	20160317900977742			-	-	-	-	-	-	-
F1A		A	4/15/2015	12	15951148930			-	-	-	-	-	-	-

[illegible]

Minnesota Democratic-Farmer-Labor Party (C00025254)
2016 Year-End Report/Amended 2016 Year-End Report

Overview of Additional Disbursements

Report Line	2016 Year-End Report (Image 201701319042386687)	Amended 2016 Year- End Report, received 2/8/17 (Image 201702089045576910)	Variance Amount
Line 21(a)(i) (Allocated Federal/Non-Federal Activity - Federal Share)	\$31,405.59	\$43,464.55	\$12,058.96
Line 21(a)(ii) (Allocated Federal/Non-Federal Activity - Non-Federal Share)	\$80,729.95	\$102,239.61	\$21,509.66
Line 21(b) (Other Federal Operating Expenditures)	\$101,939.82	\$148,198.17	\$46,258.35
Line 22 (Transfers to Affiliated/Other Party Committees)	\$0.00	\$15,436.21	\$15,436.21
Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds)	\$103,424.88	\$237,577.63	\$134,152.75
Total Variance:			\$229,415.93