

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.

Form	Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	End Cvg Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T				6/1/2017	1	201706019055168459								
MS-T				6/6/2017	4	2017060603000508456	11/29/2016	12/31/2016						
RQ2	M6	N		8/27/2017	2	201708270300092442	5/1/2017	5/31/2017	8/27/2017					
F3XN	M2	N		2/20/2017	74	2017022009049729840	11/1/2017	1/31/2017		\$272,826	\$187,394	\$273,726	\$186,995	\$35,266
F3XN	M3	N		3/20/2017	107	201703200505069770	2/1/2017	2/28/2017		\$186,995	\$116,010	\$180,463	\$122,542	\$29,199
F3XN	M4	N		4/20/2017	100	201704200502355371	3/1/2017	3/31/2017		\$122,542	\$134,117	\$177,370	\$79,289	\$68,241
F3XN	M5	N		5/19/2017	99	20170519054038492	4/1/2017	4/30/2017		\$78,289	\$188,734	\$164,712	\$103,311	\$114,315
F3XN	M6	N		6/20/2017	113	20170620063527273	5/1/2017	5/31/2017		\$103,311	\$192,955	\$198,794	\$97,473	\$142,533
F3XA	M6	A		9/2/2017	113	201709020071284046	5/1/2017	5/31/2017		\$103,311	\$192,955	\$198,794	\$97,473	\$142,533
F3XN	M7	N		7/20/2017	142	201707200507008006	6/1/2017	6/30/2017		\$91,473	\$254,142	\$284,433	\$67,181	\$121,554
F3XN	M7	A		9/2/2017	142	201709020071284159	6/1/2017	6/30/2017		\$91,473	\$254,142	\$284,433	\$67,181	\$121,554
F3XN	M8	N		8/19/2017	1/3	201708190070473590	7/1/2017	7/31/2017		\$67,181	\$516,974	\$264,716	\$289,389	\$62,599
F3XN	M9	N		9/19/2017	119	201709190074761993	8/1/2017	8/31/2017		\$289,389	\$299,128	\$205,535	\$382,982	\$69,806
F3XN	M10	N		10/16/2017	154	201710160075761680	9/1/2017	9/30/2017		\$352,982	\$310,092	\$364,636	\$328,418	\$15,455
F1A	A	A		1/1/2017	13	2017011119041370979								
F1A	A	A		10/18/2017	10	201710180075790362								
F1A	A	A		3/1/2017	12	2017031119050765022								
F1A	A	A		10/25/2017	11	20171025076673919								
Totals										\$2,200,000	\$2,144,409			

Form	Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	End Cvg 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	201511180003365690								
MS-T				5/31/2016	1	201605319017320895								
RQ2	M2	N		6/7/2015	2	15330003560	11/1/2015	1/31/2015	6/7/2015					
RQ2	M4	N		6/7/2015	2	15330003562	3/1/2015	3/31/2015	6/7/2015					
RQ2	M7	N		11/22/2015	2	20161120000006511	6/1/2015	6/30/2015	11/22/2015					
RQ2	YE	A		5/4/2017	3	20170504030000662	11/29/2016	12/31/2016	5/4/2017					
F3XN	M2	N		2/17/2015	89	15970267765	1/1/2015	1/31/2015		\$128,080	\$218,853	\$295,526	\$51,407	\$485,306
F3XN	M3	N		3/18/2015	118	15950075535	2/1/2015	2/28/2015		\$51,407	\$168,224	\$148,679	\$70,952	\$471,967
F3XN	M4	N		4/17/2015	128	15951181470	3/1/2015	3/31/2015		\$70,952	\$600,626	\$422,921	\$248,657	\$76,212
F3XA	M4	A		6/17/2015	128	15951484763	3/1/2015	3/31/2015		\$70,952	\$600,626	\$422,921	\$248,657	\$75,000
F3XN	M5	N		5/19/2015	144	15951398158	4/1/2015	4/30/2015		\$248,657	\$225,785	\$322,163	\$152,279	\$223,336
F3XA	M5	A		5/31/2016	142	20160531901718058	4/1/2015	4/30/2015		\$248,657	\$225,785	\$322,163	\$152,279	\$223,336
F3XN	M6	N		6/17/2015	137	15951485711	5/1/2015	5/31/2015		\$152,279	\$250,859	\$248,790	\$154,347	\$46,985
F3XA	M6	A		1/1/18/2015	136	201511180003366072	5/1/2015	5/31/2015		\$152,279	\$250,859	\$248,790	\$154,347	\$46,985
F3XA	M6	A		5/31/2016	138	20160531901718330	5/1/2015	5/31/2015		\$152,279	\$250,859	\$248,790	\$154,347	\$46,985
F3XN	M7	N		7/16/2015	134	201607160000241657	6/1/2015	6/30/2015		\$154,347	\$353,064	\$263,083	\$244,328	\$34,121
F3XA	M7	A		11/18/2015	131	201511180003366225	6/1/2015	6/30/2015		\$154,347	\$353,064	\$263,083	\$244,328	\$34,121
F3XA	M7	A		5/31/2016	131	20160531901718468	6/1/2015	6/30/2015		\$154,347	\$353,064	\$263,083	\$244,328	\$34,121

O-Index (2015-2016)

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

Treasurer Name: MOROLES, TYLER Cmte. Designation: U (UNAUTHORIZED)

Address: 255 PLATO BLVD E, ST PAUL, MN 55107 Filing Frequency: MONTHLY FILER

Form	Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	End Cvg 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	201511180003365690								
RQ2	M2	N		6/7/2015	2	15330003560	11/1/2015	1/31/2015	6/7/2015					
RQ2	M4	N		6/7/2015	2	15330003562	3/1/2015	3/31/2015	6/7/2015					
RQ2	M7	N		11/22/2015	2	20161120000006511	6/1/2015	6/30/2015	11/22/2015					
RQ2	YE	A		5/4/2017	3	20170504030000662	11/29/2016	12/31/2016	5/4/2017					
F3XN	M2	N		2/17/2015	89	15970267765	1/1/2015	1/31/2015		\$128,080	\$218,853	\$295,526	\$51,407	\$485,306
F3XN	M3	N		3/18/2015	118	15950075535	2/1/2015	2/28/2015		\$51,407	\$168,224	\$148,679	\$70,952	\$471,967
F3XN	M4	N		4/17/2015	128	15951181470	3/1/2015	3/31/2015		\$70,952	\$600,626	\$422,921	\$248,657	\$75,000
F3XA	M4	A		6/17/2015	128	15951484763	3/1/2015	3/31/2015		\$70,952	\$600,626	\$422,921	\$248,657	\$75,000
F3XN	M5	N		5/19/2015	144	15951398158	4/1/2015	4/30/2015		\$248,657	\$225,785	\$322,163	\$152,279	\$223,336
F3XA	M5	A		5/31/2016	142	20160531901718058	4/1/2015	4/30/2015		\$248,657	\$225,785	\$322,163	\$152,279	\$223,336
F3XN	M6	N		6/17/2015	137	15951485711	5/1/2015	5/31/2015		\$152,279	\$250,859	\$248,790	\$154,347	\$46,985
F3XA	M6	A		1/1/18/2015	136	201511180003366072	5/1/2015	5/31/2015		\$152,279	\$250,859	\$248,790	\$154,347	\$46,985
F3XA	M6	A		5/31/2016	138	20160531901718330	5/1/2015	5/31/2015		\$152,279	\$250,859	\$248,790	\$154,347	\$46,985
F3XN	M7	N		7/16/2015	134	201607160000241657	6/1/2015	6/30/2015		\$154,347	\$353,064	\$263,083	\$244,328	\$34,121
F3XA	M7	A		11/18/2015	131	201511180003366225	6/1/2015	6/30/2015		\$154,347	\$353,064	\$263,083	\$244,328	\$34,121
F3XA	M7	A		5/31/2016	131	20160531901718468	6/1/2015	6/30/2015		\$154,347	\$353,064	\$263,083	\$244,328	\$34,121

F3XN	M8	N	8/19/2015	129	201508199000852739	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	201511189003367455	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	201512179004282615	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	2016053190017318606	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	201512179004282744	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	20151203900415992	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	20151214900180308	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	201512189004377760	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	201601299004786678	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	20160217900475065	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	201605319017324681	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
F3XN	M4	N	4/19/2016	121	20160419901265986737	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
F3XA	M5	N	5/20/2016	156	20160520901538674	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	\$-37,076	\$37,076	\$37,076
F3XN	M8	N	8/18/2016	302	201608189022533333	7/1/2016	7/31/2016	\$449,041	\$84,688	\$84,688	\$475,772	\$24,697	\$24,697	\$24,697
F3XN	M9	N	9/20/2016	298	201609209030214775	8/1/2016	8/31/2016	\$475,772	\$1,032,616	\$692,886	\$815,503	\$0	\$0	\$0
F3XN	M10	N	10/20/2016	432	2016102090304475545	9/1/2016	9/30/2016	\$815,503	\$1,916,045	\$1,513,080	\$1,218,467	-	-	\$0
F3XN	12G	N	10/28/2016	934	20161028903002128	10/1/2016	10/28/2016	\$1,218,467	\$3,196,978	\$3,346,441	\$1,069,004	\$0	\$0	\$0
F3XA	12G	A	1/23/2017	938	20170123904143145	10/1/2016	10/19/2016	\$1,218,467	\$3,196,978	\$3,345,411	\$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	\$3,345,411	\$1,070,034	\$10,361	\$10,361	\$10,361
F3XN	30G	N	12/29/2016	915	201612099045691964	10/20/2016	11/28/2016	\$1,069,004	\$1,834,439	\$2,320,459	\$582,983	\$3,300	-	\$3,300
F3XA	30G	A	1/24/2017	928	201701249041463184	10/20/2016	11/28/2016	\$1,070,034	\$1,834,439	\$2,321,136	\$583,347	\$16,375	-	\$16,375
F3XA	30G	A	2/4/2017	926	201702049042413073	10/20/2016	11/28/2016	\$1,070,034	\$1,834,439	\$2,321,136	\$583,347	\$16,375	-	\$16,375
F3XA	30G	A	4/1/2017	928	201704019051904013	10/20/2016	11/28/2016	\$1,070,034	\$1,834,439	\$2,320,800	\$444,237	\$13,075	-	\$13,075
F3XA	YE	A	2/8/2017	232	20170208904556907	11/29/2016	12/31/2016	\$583,347	\$239,695	\$550,216	\$272,826	\$21,630	-	\$21,630
F1A	A	A	2/17/2015	12	15950619555	-	-	-	-	-	-	-	-	-
F1A	A	A	1/17/2016	14	2016107903713686	-	-	-	-	-	-	-	-	-
F1A	A	A	1/22/2016	14	201612209040691508	-	-	-	-	-	-	-	-	-
F1A	A	A	3/17/2016	14	20160317900977742	-	-	-	-	-	-	-	-	-
F1A	A	A	4/15/2015	12	15951148930	-	-	-	-	-	-	-	-	-

F1A	A	9/29/2015	10	201509299002785345					
F1A	A	12/16/2015	12	201512169004238207					
F1A	A	12/5/2016	15	201612059037620355					
Totals						\$14,440.952	\$14,296.206		

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