

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 11, 2018

ANALYST: Quy Vuong

I. COMMITTEE: Edward Jones PAC
C00410407
Jesse Hill, Treasurer
12555 Manchester Road
St. Louis, MO 63131

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)
11 CFR § 104.3(a)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Edward Jones PAC ("the Committee") amended its 2015 Year-End Report to disclose additional receipts totaling \$130,650.00, which were not disclosed in the original report (Attachment 2).

On January 31, 2016, the Committee filed the original 2015 Year-End Report covering the period from July 1, 2015 through December 31, 2015. The report disclosed \$72,000.00 in receipts on Schedule A, Line 11(a)(i) (Itemized Contributions From Individuals) and \$300.00 in receipts on Line 11(a)(ii) (Unitemized Contributions From Individuals) of the Detailed Summary Page (Image 201601319005196887).

On October 13, 2016, Ben Keane, counsel to the Committee, left a voicemail for the RAD Analyst. The Analyst returned Mr. Keane's call later that day and was informed by Mr. Keane that after an internal review of the Committee's records, the Committee would be filing amendments to the 2015 Year-End and 2016 April Quarterly Reports. Mr. Keane said there appeared to be a miscommunication regarding internal data transfers, which resulted in the Committee disclosing fewer receipts than the actual total for the respective reporting periods. Mr. Keane said the Committee would also file a Miscellaneous Electronic Submission ("FEC Form 99") providing some clarification

regarding the issue. The Analyst requested the specific amounts of the change in activity, to which Mr. Keane replied it would be a substantial increase in receipts. The Analyst advised Mr. Keane that depending on the activity level, the Committee may be receiving a Request for Additional Information (RFAI) from the Commission (Attachment 3).

On October 14, 2016, the Committee filed an Amended 2015 Year-End Report. The report disclosed \$201,750.00 on Schedule A, Line 11(a)(i) and \$1,200.00 on Line 11(a)(ii) of the Detailed Summary Page, a total increase of \$130,650.00 from the original report (Image 201610149032483915).

Subsequently, on October 14, 2016, the Committee filed an FEC Form 99, which stated:

“This Miscellaneous Report is filed on behalf of Edward Jones PAC in light of the three amended disclosure reports it has submitted to the commission on October 14, 2016. These amended filings were necessary due to the discovery of administrative errors associated with the disclosure of contributions received during the reporting periods for the 2015 Year End and 2016 Q1 PAC disclosure reports. As a result of the amendments to the 2015 Year-End and 2016 Q1 disclosures reports, an administrative amendment to the 2016 Q2 disclosure report was also necessary to reflect changes to the PAC's "cash on hand" total. Additional minor technical amendments have also been made to the 2016 Q2 disclosure that have likewise impacted the Committee's "cash on hand" number.

The technical errors corrected by these amended disclosures were recently discovered by the PAC during a routine, periodic review of past filings and reporting protocols that was associated with the preparation of the Committee's 2016 Q3 disclosure report. Each of these technical errors have now been appropriately self-corrected by the Committee and self-reported to the FEC. The administrative cause of the identified errors - the miscommunication of deposited contributions/expenditure data between PAC accounting and compliance personnel - has also been eliminated so that similar defects will no longer occur. The Committee has also added an additional layer of review by both internal and external compliance experts to ensure that it continues to adhere to FEC disclosure obligations moving forward.

Each of the amendments filed today by Edward Jones PAC were brought to the attention of the PAC's Reports Analysis Division analyst by phone earlier this week. Regardless of that fact, however, please do not hesitate to contact the Committee if there are any questions regarding the contents of the amended disclosure reports” (Image 201610149032486273).

On December 26, 2016, an RFAI was sent to the Committee referencing the Amended 2015 Year-End Report, received October 14, 2016. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2015

Year-End Report, and noted the Committee's FEC Form 99, also received October 14, 2016 (Image 201612260300070530).

On January 3, 2017, Mr. Keane left a voicemail for the Analyst regarding the RFAI the Committee received referencing the Amended 2015 Year-End Report. The Analyst left a return voicemail for Mr. Keane along with the Analyst's contact information and availability (Attachment 3).

On January 6, 2017, Mr. Keane and the RAD Analyst spoke about the RFAI the Committee received referencing the Amended 2015 Year-End Report. The Analyst told Mr. Keane the RFAI was sent to the Committee to acknowledge the increase in activity disclosed on the amended report along with the clarifying information the Committee provided in the Form 99. The Analyst told Mr. Keane that if there was any additional information the Committee wanted to provide regarding the issue, they could do so at this time. Mr. Keane questioned if any additional action would be taken by the FEC regarding the matter. The Analyst told him that if there were to be additional action taken by the FEC, the appropriate division would contact the Committee at that time (Attachment 3).

On January 30, 2017, the Committee filed an FEC Form 99 in response to the RFAI referencing the Amended 2015 Year-End Report. The Committee stated, in part:

"This Miscellaneous Report is filed on behalf of Edward Jones PAC in response to the Commission's Request for Additional Information (RFAI) dated December 26, 2016. As noted in the RFAI, Edward Jones PAC submitted a Miscellaneous Electronic Statement on October 14, 2016 in conjunction with the three amended disclosure reports filed on that date. The description provided in that previous statement remains accurate and Edward Jones PAC does not, at this time, have additional pertinent information regarding the described amendments" (Image 201701309041560912).

On November 1, 2017, the Analyst left a voice message for Mr. Keane. The Analyst informed Mr. Keane that the outstanding issues from the Committee's 2015 Year-End Report may be referred to another office within the Commission for potential action and requested a return call so the issue could be discussed in further detail (Attachment 3).

On November 6, 2017, Mr. Keane called regarding a voice message he left the Analyst the previous week. The Analyst informed Mr. Keane that the substantial increase in receipts disclosed in the Committee's 2015 Amended Year-End Report may be referred by the Reports Analysis Division to another office within the Commission for additional action. The Analyst told Mr. Keane that the Committee has the opportunity to provide additional information regarding the matter on the public record, if they would like to do so. Mr. Keane wanted to know which office would be handling the issue moving forward, to which the Analyst responded that the information could not be provided at this time. The Analyst told Mr. Keane that someone from the appropriate division will be contacting the Committee in the future (Attachment 3).

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

O-Index (2017-2018)											
Treasurer Name: HILL, JESSE Cmte. Name: EDWARD JONES PAC Cmte. ID: C00410407 Address: 12555 MANCHESTER ROAD, ST. LOUIS, MO 63131											
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER											
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MS-T						1/30/2017	1	201701300041560912		End	Cvg
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F3XN	MY			N		7/31/2017	16	201707310069909619		1/1/2017	6/30/2017
Totals											

O-Index (2015-2016)											
Treasurer Name: HILL, JESSE Cmte. Name: EDWARD JONES PAC Cmte. ID: C00410407 Address: 12555 MANCHESTER ROAD, ST. LOUIS, MO 63131											
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER											
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F3XN	YE			N	1/31/2016	23	201601310005196885		7/1/2015	12/31/2015	
F3XN	Q3			A	10/14/2016	69	201610140032483913		7/1/2015	12/31/2015	
F3XN	Q1			N	4/15/2016	11	201604150012465695		1/1/2016	3/31/2016	
F3XN	Q1			A	10/14/2016	16	201610140032486183		1/1/2016	3/31/2016	
F3XN	Q2			N	7/15/2016	12	20160759020366639		4/1/2016	6/30/2016	
F3XN	Q2			A	10/14/2016	13	201610140032486248		4/1/2016	6/30/2016	
F3XN	Q3			N	10/14/2016	8	201610140032486402		7/1/2016	9/30/2016	
F3XN	Q2G			N	10/26/2016	6	201610260034613395		10/1/2016	10/19/2016	
F3XN	30G			N	12/8/2016	9	201612080039957546		10/20/2016	11/28/2016	
F3XN	YE			N	1/31/2017	5	201701310042191278		11/29/2016	12/31/2016	
Totals											

O-Index (2013-2014)											
Treasurer Name: HILL, JESSE Cmte. Name: EDWARD JONES PAC Cmte. ID: C00410407 Address: 12555 MANCHESTER ROAD, ST. LOUIS, MO 63131											
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER											
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F3XN	YE			N	1/31/2014	19	14940318869		7/1/2013	12/31/2013	
F3XN	YE			A	2/15/2014	20	14940353316		1/1/2013	12/31/2013	
F3XN	12P			N	4/15/2014	8	14960689978		1/1/2014	2/26/2014	
F3XN	Q1			N	4/15/2014	7	14960706640		2/27/2014	3/31/2014	
F3XN	12P			N	5/20/2014	10	14941234846		4/1/2014	4/30/2014	
F3XN	12P			N	6/10/2014	10	14961238994		5/1/2014	6/4/2014	
F3XN	Q2			N	7/1/2014	8	14941764978		6/5/2014	6/30/2014	
F3XN	Q3			N	10/1/2014	14	14978125328		7/1/2014	9/30/2014	
F3XN	12G			N	10/2/2014	6	14951874452		10/1/2014	10/15/2014	
F3XN	30G			N	12/3/2014	7	14952743604		10/6/2014	11/24/2014	
F3XN	YE			N	1/28/2015	8	15950120582		11/25/2014	12/31/2014	
F1A				A	4/9/2013	11	13940514040				
Totals											

Totals	\$143,195	\$188,137
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Edward Jones PAC (C00410407)
2015 Year-End Report/Amended 2015 Year-End Report

Overview of Additional Receipts

Report Line	2015 Year-End Report (Image 201601319005196887)	Amended 2015 Year-End Report, received 10/14/2016 (Image 201610149032483915)	Variance Amount
Line 11(a)(i) (Itemized Contributions From Individuals)	\$72,000.00	\$201,750.00	\$129,750.00
Line 11(a)(ii) (Unitemized Contributions From Individuals)	\$300.00	\$1,200.00	\$900.00
Total Variance:			\$130,650.00