

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: January 23, 2018

ANALYST: Quy Vuong

- I. COMMITTEE: Working for Us Political Action  
Committee Inc.  
C00430876  
Steven Rosenthal, Treasurer  
1725 I Street NW, Suite 900  
Washington, DC 20006
- II. RELEVANT STATUTES: 52 U.S.C. § 30104(g)(1)  
11 CFR § 104.4(c)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)**

Working for Us Political Action Committee Inc. ("the Committee") failed to timely file one (1) 24-Hour Report to support four (4) independent expenditures, totaling \$88,508.48, disclosed on the 2016 July Quarterly Report, made after the 20th day but more than 24 hours before the 2016 Primary Election held in the state of Maryland (Attachment 2).

On July 8, 2016, the Committee filed its 2016 July Quarterly Report, covering the period from April 7, 2016 through June 30, 2016, which included a Schedule E (Itemized Independent Expenditures) disclosing nine (9) independent expenditures, totaling \$686,359.73, made in support of one (1) federal candidate. The Committee failed to file one (1) 24-Hour Report to support four (4) independent expenditures totaling \$88,508.48 for the 2016 Primary Election held in the state of Maryland (Images 201607089020380499-503).

On March 23, 2017, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2016 July Quarterly Report. Among other items, the RFAI noted that the Committee may have failed to file one or more required 24-Hour Reports

regarding independent expenditures. A chart was included with the RFAI identifying the four (4) independent expenditures, totaling \$88,508.48, for which a 24-Hour Report had not been filed (Image 201703230300083021-24).

On June 8, 2017, the Reports Analysis Division (RAD) Analyst attempted to contact Steven Rosenthal, the Committee's Treasurer, regarding the potentially enforceable matter, but was unable to leave a voice message as the voicemail box was full (Attachment 3).

On July 20, 2017, the Analyst left a voice message at the phone number listed on the website believed to be associated with the Committee. The Analyst stated that the message was for Mr. Rosenthal and that there are outstanding issues that may receive additional enforcement action within the Commission (Attachment 3).

Subsequently on July 20, 2017, Gary Gruver, a consultant for the Committee, called the Analyst and stated that he never received the RFAI referencing the 2016 July Quarterly Report. The Analyst walked Mr. Gruver through finding the RFAI on the Commission's website and advised him to update the Committee's information with a Statement of Organization. The Analyst then addressed the issues disclosed in the RFAI referencing the 2016 July Quarterly Report; stating in part, that there were independent expenditures on Schedule E in which 24-Hour Reports were not filed. The Analyst advised Mr. Gruver to provide clarification regarding this matter. Mr. Gruver said he would try to have a response by Monday, July 24, 2017 regarding all of these issues (Attachment 3).

On August 16, 2017, the Analyst attempted to contact Mr. Gruver to follow-up on the Committee's referable issues, but was unable to leave a message (Attachment 3).

On August 22, 2017, Mr. Gruver called the Analyst for assistance with responding adequately to the RFAI referencing the 2016 July Quarterly Report. Mr. Gruver was not sure how to respond to the issue regarding missing 24-Hour Reports, so the Analyst told Mr. Gruver that he can file the 24-Hour Reports and clarify why they were not filed or timely filed in memo text or on a separate FEC Form 99. The Analyst told Mr. Gruver that the issue regarding the missing 24-Hour Reports would still move forward for additional action and the appropriate division at the FEC would be contacting him at a later time (Attachment 3).

Later on August 22, 2017, the Committee filed an Amended 2016 July Quarterly Report. The amended report contained no other changes on Schedule E from the original report (Images 201708229071116080-84).

In addition, on August 22, 2017, the Committee filed one (1) 24-Hour Report to support four (4) independent expenditures, totaling \$88,508.48, disseminated on April 21, 2016 (Images 201708229071116374-75).

Lastly, on August 22, 2017, the Committee filed a FEC Form 99, which stated in part:

“A 24 hour report filed on April 22, 2016, was filed in error. The report filed was a duplicate of a report filed on April 16, 2016. This report was not the one that was intended to be filed on April 22, 2016. The intended report would have covered the items missing listed in item 5 of your letter... Schedule E of our report disclosed information that was required to be filed on a 24 hour report. The report in question was produced to be filed on April 22, 2016, however, due to a clerical error the wrong report was filed on that day. The report filed was a duplicate of a report filed on April 16, 2016, as noted above in item 4. The actual report produce to be filed on April 22, 2016, has now been filed” (Image 201708229071116389).

On November 1, 2017, the Analyst left a voice message for Mr. Gruver. The Analyst stated that the outstanding issues from the Committee’s 2016 July Quarterly Report would be referred to another division at the FEC for additional action. The Analyst continued that the Committee could provide any additional information on the public record regarding the matter (Attachment 3).

Later on November 1, 2017, Mr. Gruver called the Analyst, who then explained to Mr. Gruver that the issue being referred for additional action was regarding the Committee’s failure to timely file a 24-Hour Report. The Analyst reiterated that the Committee could provide any additional information regarding this matter on the public record. Mr. Gruver asked which division would be handling the matter moving forward. The Analyst responded that this information could not be currently provided, but a representative from the appropriate division would contact the Committee at a later time. Mr. Gruver said the Committee would revisit the matter and determine if they would be providing any additional information (Attachment 3).

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

O-Index (2017-2018)													
Cmte. ID: C00430876 Cmte. Name: WORKING FOR US POLITICAL ACTION COMMITTEE INC													
Treasurer Name: ROSENTHAL, STEVEN Address: 1725 I STREET, NW SUITE 900, WASHINGTON, DC 20006													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
MS-T			8/22/2017	1	20170822907116399								
F3XN	MY	N	7/14/2017	5	201707149066640319	1/1/2017	6/30/2017		\$90,676	\$0		\$90,676	\$0
F3XN	YE	N	1/9/2018	6	201801099080382636	7/1/2017	12/31/2017		\$90,676	\$7,489		\$98,165	\$0
F24N	24		8/22/2017	2	20170822907116374								
Totals										\$7,489		\$0	

O-Index (2015-2016)													
Cmte. ID: C00430876 Cmte. Name: WORKING FOR US POLITICAL ACTION COMMITTEE INC													
Treasurer Name: ROSENTHAL, STEVEN Address: 1725 I STREET, NW SUITE 900, WASHINGTON, DC 20006													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
RQ2	Q2	N	3/23/2017	5	201703230300083020	4/7/2016	6/30/2016	3/23/2017					
F3XN	Q1	N	4/12/2015	6	15970337271	1/1/2015	3/31/2015		\$143,768	\$0		\$143,768	\$1,800
F3XN	Q2	N	7/13/2015	6	201507139000093262	4/1/2015	6/30/2015		\$143,768	\$0		\$143,768	\$1,800
F3XN	Q3	N	10/15/2015	7	201510159002925070	7/1/2015	9/30/2015		\$143,768	\$0	\$45,000	\$98,768	\$1,800
F3XN	YE	N	1/25/2016	7	201601259004593672	10/1/2015	12/31/2015		\$98,768	\$0	\$25,020	\$73,748	\$1,800
F3XN	12P	N	4/14/2016	12	201604149012335112	1/1/2016	4/6/2016		\$73,748	\$1,100,000	\$982,717	\$191,031	\$1,800
F3XN	Q2	N	7/8/2016	17	201607089020380487	4/7/2016	6/30/2016		\$191,031	\$635,000	\$735,355	\$90,676	\$0
F3XN	Q3	N	10/14/2016	18	201610149032467090	7/1/2016	9/30/2016		\$90,676	\$0	\$0	\$90,676	\$0
F3XN	12G	N	10/26/2016	5	201610269034586486	10/1/2016	10/19/2016		\$90,676	\$0	\$0	\$90,676	\$0
F3XN	30G	N	12/7/2016	5	201612079037733305	10/20/2016	11/28/2016		\$90,676	\$0	\$0	\$90,676	\$0
F3XN	YE	N	1/30/2017	5	201701309041543840	11/29/2016	12/31/2016		\$90,676	\$0	\$0	\$90,676	\$0
F24N	48		3/28/2016	1	201603289012194671								
F24A	48		4/13/2016	2	201604139012321781								
F24N	24		4/13/2016	2	201604139012321786								
F24N	48		4/6/2016	2	201604069012232965								
F1A			4/14/2016	4	201604149012333129								
F24N	24	A	4/22/2016	1	201604229015040340								
F24N	24		4/16/2016	1	201604169012569080								
F24N	24		4/27/2016	1	201604279015360348								
Totals										\$1,735,000	\$1,788,092		

O-Index (2013-2014)													
Cmte. ID: C00430876 Cmte. Name: WORKING FOR US POLITICAL ACTION COMMITTEE INC													
Treasurer Name: ROSENTHAL, STEVEN Address: 1725 I STREET, NW SUITE 900, WASHINGTON, DC 20006													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
F3XN	MY	N	7/30/2013	7	13964461107	1/1/2013	6/30/2013		\$94,861	\$0	\$1,711	\$93,149	\$1,800
F3XN	YE	N	1/28/2014	7	14940137606	7/1/2013	12/31/2013		\$93,149	\$0	\$10,000	\$83,149	\$1,800
F3XN	Q1	N	4/14/2014	6	14960666417	1/1/2014	3/31/2014		\$83,149	\$0	\$0	\$83,149	\$1,800
F3XN	Q2	N	7/11/2014	12	14961549627	4/1/2014	6/30/2014		\$83,149	\$141,000	\$139,634	\$84,514	\$1,800
F3XN	Q3	N	10/12/2014	6	14978166236	7/1/2014	9/30/2014		\$84,514	\$0	\$0	\$84,514	\$1,800
F3XN	12G	N	10/22/2014	6	14951905509	10/1/2014	10/15/2014		\$84,514	\$0	\$0	\$84,514	\$1,800

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F3XN	30G	N	12/3/2014	6	14952711267	10/16/2014	11/24/2014		\$84,514	\$0	\$0	\$84,514	\$1,800	\$1,800
F3XN	YE	N	12/7/2015	8	15950090017	11/25/2014	12/31/2014		\$84,514	\$84,904	\$25,651	\$143,768	\$1,800	\$1,800
F24N	24		5/29/2014	1	14941274066									
F24N	24		5/31/2014	1	14961233487									
Totals										\$225,904	\$176,997			

**Working for Us Political Action Committee Inc. (C00430876)**  
**2016 July Quarterly Report**

**24-Hour Report Not Timely Filed**

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported/ Opposed	State and Date of Election in which Disseminated	24-Hour Report Filed
Block by Block	4/21/2016	\$55,000.00	Donna Edwards	Maryland – 2016 Primary (4/26/16)	8/22/2017
Switchboard Communications	4/21/2016	\$1,356.80	Donna Edwards	Maryland – 2016 Primary (4/26/16)	8/22/2017
The Strategy Group, Inc.	4/21/2016	\$23,151.68	Donna Edwards	Maryland – 2016 Primary (4/26/16)	8/22/2017
The Strategy Group, Inc.	4/21/2016	\$9,000.00 <i>24-Hour Report Required</i>	Donna Edwards	Maryland – 2016 Primary (4/26/16)	8/22/2017
	<b>Total</b>	<b>\$88,508.48</b>			