

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: June 11, 2018

ANALYST: Kaitlin Seufert

- I. COMMITTEE: Restore American Freedom and Liberty
(C00570903)
Alexander Hornaday, Treasurer
1624 Market Street, Suite 202
Denver, CO 80202
- 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)

Restore American Freedom and Liberty (“the Committee”) amended its 2016 October Quarterly Report to disclose additional disbursements totaling \$64,958.07, which were not disclosed on the Amended 2016 October Quarterly Report, received October 16, 2016 (Attachment 2).

On October 16, 2016, the Committee filed an Amended 2016 October Quarterly Report, covering the period from July 1, 2016 through September 30, 2016. The report disclosed \$1,500.00 on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 201610169032881207).

On December 7, 2016 and February 26, 2017, the Committee filed Amended 2016 October Quarterly Reports. The reports disclosed no change in disbursements from the Amended 2016 October Quarterly Report, received October 16, 2016 (Images 201612079037712136 and 201702269050583221, respectively).

On January 24, 2018, the Committee filed an Amended 2016 October Quarterly Report. The report disclosed \$66,458.07 in disbursements on Line 21(b), an increase of \$64,958.07 from the Amended 2016 October Quarterly Report, received October 16, 2016 (Image 201801249090624635).

On February 15, 2018, a Request for Additional information (RAI) was sent to the Committee referencing the Amended 2016 October Quarterly Report, received January 24, 2018. The RAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2016 October Quarterly Report (Image 201802160300098238)

On April 3, 2018, the Reports Analysis Division (RAD) Analyst called Alexander Hornaday, the Committee's Treasurer, and left a voicemail regarding the increase in disbursements on the Amended 2016 October Quarterly Report, received January 24, 2018. The Analyst explained that the issue could be referred to another office at the Commission for further action. The Analyst further explained the courtesy call was to give the Committee an opportunity to put additional information on the public record if they wished to do so. The Analyst requested a call back from the Committee as soon as possible (Attachment 3).

Also, on April 3, 2018, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99"), which stated:

"In response to the RAI for the October 2016 Quarterly:

In 2016, it turned out that because of an error I did not have access to the statements for one of the committee's bank accounts. For disbursements I relied on what turned out to be incomplete invoicing from vendors. This is why the disbursements were not reported correctly. When I got access to the full banking records in 2017, I discovered the anomaly. In the latter of half of 2017 the committee conducted an internal audit, and amended the filings accordingly" (Image 201804039098809506).

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

Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
F3XA	Q3	A	12/1/2016	31	20161207903771233	7/1/2016	9/30/2016		\$51,103	\$82,062	\$16,470	\$116,695	-	-	\$0
F3XA	Q3	A	2/26/2017	31	201702269050583218	7/1/2016	9/30/2016		\$53,388	\$82,062	\$16,470	\$118,980	-	-	\$0
F3XA	Q3	A	1/24/2018	35	201801249090824632	7/1/2016	9/30/2016		\$39,717	\$82,062	\$81,428	\$40,351	-	-	\$0
F3XN	12G	N	10/27/2016	13	201610279036688005	10/1/2016	10/19/2016		\$116,695	\$28,686	\$17,932	\$127,448	-	-	\$0
F3XA	12G	A	1/24/2018	13	201612079037712324	10/1/2016	10/19/2016		\$116,695	\$28,686	\$17,932	\$127,449	-	-	\$0
F3XA	12G	A	2/26/2017	13	201702269050583249	10/1/2016	10/19/2016		\$118,980	\$28,686	\$17,932	\$129,734	-	-	\$0
F3XA	12G	A	1/24/2018	13	201801249090824667	10/1/2016	10/19/2016		\$40,351	\$28,686	\$17,432	\$51,605	-	-	\$0
F3XN	30G	N	12/7/2016	14	201612079037715590	10/20/2016	11/28/2016		\$127,449	\$18,877	\$63,000	\$83,326	-	-	\$0
F3XA	30G	A	2/26/2017	14	201702269050583262	10/20/2016	11/28/2016		\$129,734	\$18,877	\$63,000	\$85,611	-	-	\$0
F3XA	30G	A	5/14/2017	14	201705149053753953	10/20/2016	11/28/2016		\$129,734	\$18,827	\$63,000	\$85,561	-	-	\$0
F3XA	30G	A	1/25/2018	13	201801259090829239	10/20/2016	11/28/2016		\$51,605	\$18,827	\$5,615	\$64,817	\$62,500	-	\$62,500
F3XN	YE	N	1/31/2017	6	201701319042380338	11/29/2016	12/31/2016		\$83,326	\$0	\$679	\$82,647	-	-	\$0
F3XA	YE	A	5/14/2017	6	201705149053753978	11/29/2016	12/31/2016		\$85,561	\$0	\$679	\$84,882	-	-	\$0
F3XA	YE	A	7/30/2017	6	201707309069854314	11/29/2016	12/31/2016		\$85,561	\$0	\$30,679	\$54,882	-	-	\$0
F3XA	YE	A	1/25/2018	9	201801259090830946	11/29/2016	12/31/2016		\$64,817	\$0	\$40,772	\$24,044	-	-	\$0
F24N	24		1/31/2016	1	201601319005288183										
F24A	24		7/25/2016	1	201607259021936881										
F24A	24		7/25/2016	1	201607259021936882										
F24N	24		4/13/2016	1	201604139012317434										
F24N	24		12/10/2016	1	201612109040604239										
F24N	24		5/17/2016	1	201605179015514355										
F24N	24		8/23/2016	1	201608239023730508										
F1A	24	A	8/25/2015	5	201508259000929345										
F24N	24	N	1/2/2016	5	201610290307018774										
Totals										\$410,582	\$386,537				

O-Index (2013-2014)															
Cmte. ID: C00570903 Cmte. Name: RESTORE AMERICAN FREEDOM AND LIBERTY															
Treasurer Name: HORNADAY, ALEXANDER Address: 1624 MARKET STREET SUITE 202, DENVER, CO 80202															
Cmte. Type: V (NON-QUALIFIED NON-PARTY WITH NON-CONTRIBUTION ACCOUNT) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
F3XN	YE	N	1/24/2015	7	15970035922	12/5/2014	12/31/2014		\$0	\$2,000	\$500	\$1,500	-	-	\$0
F3XA	YE	A	3/16/2015	7	15950866914	12/5/2014	12/31/2014		\$0	\$650	\$500	\$150	-	-	\$0
F1		A	12/15/2014	7	14031355002										
F1		N	12/10/2014	7	14031353943										
Totals										\$650	\$500				

Restore American Freedom and Liberty (C00570903)

Amended 2016 October Quarterly Report, received 10/16/16/Amended 2016 October Quarterly Report, received 1/24/18

Overview of Additional Disbursements

Report Line	Amended 2016 October Quarterly Report, received 10/16/16 (Image 201610169032881207)	Amended 2016 October Quarterly Report, received 1/24/18 (Image 201801249090624635)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$1,500.00	\$66,458.07	\$64,958.07
		Total:	\$64,958.07