

REPORTS ANALYSIS DIVISION REFERRAL

TO
OFFICE OF GENERAL COUNSEL

DATE: July 2, 2018

ANALYST: Romy Adame-Wilson

I. COMMITTEE: SEAL PAC Supporting Electing American Leaders PAC (C00570226)
Paul Kilgore, Treasurer (2/2/18 - Present)
Barbara P. Lazaris (5/9/17 - 2/1/18)
Vincent DeVito, Esq. (12/31/14 - 5/8/17)
1155 15th St. NW
Washington, DC 20005

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)

SEAL PAC Supporting Electing American Leaders PAC ("the Committee") amended its 2017 Mid-Year Report to disclose additional receipts totaling \$607,776.02, which were not disclosed on the original report (Attachment 2).

On July 30, 2017, the Committee filed the original 2017 Mid-Year Report covering the period from January 1, 2017 through June 30, 2017. The report disclosed \$243,592.26 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$171,661.10 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 201707309069853422, Attachment 2).

On January 18, 2018, the Committee filed an Amended 2017 Mid-Year Report. The Report disclosed no change in activity from the original report (Image 201801189090433068).

On January 31, 2018, the Committee filed an Amended 2017 Mid-Year Report. The Report disclosed \$301,938.25 in receipts on Line 11(a)(i) and \$721,091.13 in receipts

on Line 11(a)(ii) of the Detailed Summary Page, a total increase in receipts of \$607,776.02 from the original report (Image 201801319091112998, Attachment 2).

On April 1, 2018, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2017 Mid-Year Report, received January 31, 2018. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2017 Mid-Year Report (Image 201804010300001706).

On May 6, 2018, the Committee filed a Miscellaneous Electronic Submission (“FEC Form 99”) in response to the RFAI referencing the Amended 2017 Mid-Year Report, received January 31, 2018. The Committee stated, in part:

“The PACs Mid-Year 2017 Report Amendment 2, filed with the Commission on January 31, 2018, included up-to-date data that was missing from its original Mid-Year 2017 Report. As the Commission is aware, the PAC stated in a FEC Form 99 filed on December 22, 2017, that it would be “researching alternative software that may prevent a future data recovery error.? During the process of rebuilding the defective FEC.dcf file used to create the original report, it was discovered that additional receipts were not included. The additional receipts data was held in a separate electronic file that was not uploaded to FEC’s DISCLOSE system. Also, during that process, and while rebuilding the file and creating an amended report, PAC staff communicated with FEC technical and RAD staff with regard to the matter, and – rather than submit multiple amendments – PAC staff decided to migrate from using FEC.dcf files to the use of advanced commercial software that is more capable of handing the volume of receipts received by the PAC. The PAC waited for installation of the advanced software while rebuilding the information missing from the defective FEC.dcf, amending the report, and adding the missing data. In addition to upgrading its software, the PAC has increased its filing schedule from quarterly to monthly disclosure of its campaign finances. As the bulk of the missing data was from individual contributions under \$200 (in aggregate), the individual contributor information was not required to be itemized. However, with the new software, the PAC is enabled to fully report most of its contributors’ respective information and better track excessive contributions if they occur” (Image 201805069111991028).

On May 15, 2018, the Reports Analysis Division (RAD) Analyst called Paul Kilgore, the Committee’s Treasurer, regarding the RFAI on the Amended 2017 Mid-Year Report, received January 31, 2018. The RAD Analyst explained that the Committee would be referred for further action. The Analyst stated that the Committee could file an FEC Form 99 with any additional information about the increase in activity. Mr. Kilgore explained that he did not think there was any additional information to share outside of the FEC Form 99 filed May 6, 2018, but that he would respond by June 1, 2018 if there was (Attachment 3).

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

Form	Tp	Rpt	Tp	A/I	Recpt Dt	Pgs	Begin Ingr#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans	
MS-T					1/31/2017	1	2017011319042253802											
MS-T					4/6/2017	1	201704069052024175											
MS-T					4/26/2017	1	201704269053478901											
MS-T					6/1/2017	1	201706019055185046											
MS-T					6/1/2017	1	201706019055185047											
MS-T					12/22/2017	1	201712229090329903											
MS-T					12/30/2017	7	201801020300183144											
MSM					2/5/2018	1	201802059094238817											
MS-O					2/12/2018	2	201802120300097919											
MS-T					5/6/2018	1	201805069111991028											
MS-T					5/7/2018	1	201805079111994296											
MS-T					5/25/2018	1	201805259113398347											
RQ1				A	5/15/2017	2	2017051603000986528				5/15/2017							
RQ2				MY	A	4/1/2018	2	201804010300001706			1/1/2017	6/30/2017	4/1/2018					
RQ2				MY	N	1/12/2017	6	20171120030095240			1/1/2017	6/30/2017	1/12/2017					
RQ2				YE	N	4/1/2018	3	201804010300001708			7/1/2017	12/31/2017	4/1/2018					
RQ2				M2	N	4/19/2018	3	201804190300003794			1/1/2018	1/31/2018	4/19/2018					
RQ2				M3	N	5/1/2018	2	201805010300008122			2/1/2018	2/28/2018	5/1/2018					
RQ2				M4	A	6/25/2018	4	201806250300012659			3/1/2018	3/31/2018	6/25/2018					
F3XN				N	7/30/2017	252	20170730069953420				1/1/2017	6/30/2017	\$408,882	\$415,253	\$1,055,030	(\$230,895)	\$0	
F3XN				MY	A	1/18/2018	253	201801189090433066			1/1/2017	6/30/2017		\$215,633	\$415,253	\$1,055,030	(\$224,143)	\$0
F3XN				MY	A	1/31/2018	468	201801319091112996			1/1/2017	6/30/2017		\$215,633	\$1,023,029	\$1,055,030	\$183,632	\$0
F3XN				YE	N	1/31/2018	751	201801319091145991			7/1/2017	12/31/2017		\$183,632	\$977,047	\$782,213	\$278,466	\$69,701
F3XN				M2	N	2/20/2018	31	20180220094624424			1/1/2018	1/31/2018		\$278,466	\$110,500	\$71,302	\$37,663	\$69,701
F3XN				M2	A	5/17/2018	31	201805179112077521			1/1/2018	1/31/2018		\$278,466	\$10,990	\$71,317	\$318,139	\$24,764
F3XN				M3	N	3/20/2018	57	201803200968616530			2/1/2018	2/28/2018		\$317,663	\$109,577	\$109,904	\$407,990	\$69,701
F3XN				M3	A	5/17/2018	57	201805179112077616			2/1/2018	2/28/2018		\$318,139	\$109,939	\$112,637	\$405,441	\$69,701
F3XN				M4	N	4/20/2018	71	201804200911689455			3/1/2018	3/31/2018		\$407,980	\$190,989	\$253,256	\$345,723	\$69,701
F3XN				M4	A	5/17/2018	68	201805179112077673			3/1/2018	3/31/2018		\$405,441	\$192,790	\$254,516	\$343,715	\$69,701
F3XN				M5	N	5/17/2018	102	201805179112078811			4/1/2018	4/30/2018		\$343,715	\$267,252	\$260,349	\$360,618	\$69,701
F3XN				M6	N	6/20/2018	93	2018062009113913107			5/1/2018	5/31/2018		\$350,618	\$203,392	\$197,263	\$356,747	\$69,701
F1A				A	A	5/9/2017	4	201705099053512222										
F1A				A	A	5/9/2017	4	201705099053512226										
F1A				A	A	2/28/2018	4	2018022809050385238										
F1A				A	A	6/1/2017	4	201706019055185067										
Totals															\$2,874,442	\$2,733,329		

Form	Tp	Rpt	Tp	A/I	Recpt Dt	Pgs	Begin Ingr#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T					7/15/2015	1	201507159000178286										
MS-T					9/22/2015	1	201509220900274315										

Cmte. ID: C00570226 Cmte. Name: SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC

Treasurer Name: KILGORE, PAUL Address: 1155 15TH ST NW, WASHINGTON, DC 20005

Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

MS-T	1	9/28/2015	5	201509280300023941	4/1/2015	6/30/2015		
MS-T	12/15/2015	1	201512159004206903					
MS-T	5/1/2016	1	201605109015397737					
MS-T	5/11/2016	1	201605119015432116					
MS-T	9/28/2016	2	201609289032142460					
MS-T	12/8/2016	1	201612089039980595					
RQ2	Q2	N	8/18/2015	5	20150818030002177	4/1/2015	6/30/2015	8/18/2015
RQ2	Q3	A	4/5/2016	2	201604050300040983	7/1/2015	9/30/2015	4/5/2016
RQ2	Q3	N	11/11/2015	2	2015111030007696	7/1/2015	9/30/2015	11/11/2015
RQ2	YE	N	4/6/2016	6	201604060300041305	10/1/2015	12/31/2015	4/6/2016
RQ2	Q1	A	8/25/2016	3	201608250300057629	1/1/2016	3/31/2016	8/25/2016
RQ2	Q2	A	3/6/2017	3	20170307030005299	4/1/2016	6/30/2016	3/6/2017
RQ2	Q2	A	5/15/2017	2	201705160300086521	4/1/2016	6/30/2016	5/15/2017
RQ2	Q3	A	5/15/2017	2	201705160300086524	7/1/2016	9/30/2016	5/15/2017
F3XN	Q1	N	4/14/2015	10	15670340703	1/1/2015	3/31/2015	\$0
F3XN	Q2	N	7/15/2015	50	201507159000178513	4/1/2015	6/30/2015	\$3,485
F3XA	Q2	A	4/11/2017	53	201704119052067142	4/1/2015	6/30/2015	\$3,485
F3XN	Q3	N	10/15/2015	132	201510159002918037	7/1/2015	9/30/2015	\$74,062
F3XA	Q3	A	12/15/2015	132	20151215900505603	7/1/2015	9/30/2015	\$74,062
F3XA	Q3	A	4/11/2017	132	201704119052067448	7/1/2015	9/30/2015	\$71,645
F3XA	Q3	A	4/11/2017	138	201704119052067682	7/1/2015	9/30/2015	\$71,645
F3XN	YE	N	1/29/2016	144	201601299004790297	10/1/2015	12/31/2015	\$81,762
F3XA	YE	A	5/11/2016	144	201605119015431686	10/1/2015	12/31/2015	\$81,762
F3XA	YE	A	4/11/2017	144	201704119052668008	10/1/2015	12/31/2015	\$78,628
F3XA	YE	A	4/11/2017	148	201704119052068339	10/1/2015	12/31/2015	\$78,628
F3XN	Q1	N	4/11/2016	68	201604119015439815	11/1/2016	3/31/2016	\$66,887
F3XA	Q1	A	5/11/2016	68	201605119015431830	11/1/2016	3/31/2016	\$66,887
F3XA	Q1	A	9/28/2016	69	201609289032142500	11/1/2016	3/31/2016	\$66,887
F3XA	Q1	A	4/11/2017	69	201704119052068660	1/1/2016	3/31/2016	\$54,213
F3XA	Q1	A	4/11/2017	73	201704119052068834	11/1/2016	3/31/2016	\$54,213
F3XN	Q2	N	7/15/2016	259	20160715900205875721	4/1/2016	6/30/2016	\$164,272
F3XA	Q2	A	8/3/2016	260	201608039022174183	4/1/2016	6/30/2016	\$164,272
F3XA	Q2	A	3/16/2017	260	20170316905089634	4/1/2016	6/30/2016	\$164,272
F3XA	Q2	A	4/5/2017	261	2017040505052014209	4/1/2016	6/30/2016	\$164,272
F3XA	Q2	A	4/1/2017	267	2017041190520689519	4/1/2016	6/30/2016	\$145,053
F3XN	Q3	N	10/14/2016	557	2016101490032487051	7/1/2016	9/30/2016	\$163,895
F3XA	Q3	A	3/16/2017	557	201703169050870431	7/1/2016	9/30/2016	\$163,895
F3XA	Q3	A	4/5/2017	557	20170405905204526	7/1/2016	9/30/2016	\$173,695
F3XA	Q3	A	4/1/2017	567	2017041190520670948	7/1/2016	9/30/2016	\$131,790
F3XN	12G	N	4/26/2017	232	201704269053479555	10/1/2016	10/1/2016	\$250,638
F3XN	30G	N	12/8/2016	407	201612089039975611	10/1/2016	11/28/2016	\$34,825
F3XA	30G	A	4/4/2017	415	2017040405051984572	10/1/2016	11/28/2016	\$405,899
F3XA	30G	A	4/5/2017	415	201704059052015455	10/1/2016	11/28/2016	\$331,160
F3XA	30G	A	4/1/2017	415	201704126052081251	10/1/2016	11/28/2016	\$331,160
F3XA	30G	A	4/26/2017	189	201704269053479209	10/20/2016	11/28/2016	\$154,884
F3XA	YE	N	1/31/2017	10	201701319042251080	1/1/2016	12/31/2016	\$405,899
F3XA	YE	A	4/4/2017	10	201704049051985019	1/1/2016	12/31/2016	\$1,050
F3XA	YE	A	4/5/2017	10	201704059052015885	1/1/2016	12/31/2016	\$395,899
F3XA	YE	A	4/12/2017	11	201704126052082016	1/1/2016	12/31/2016	\$313,705
F3XA	YE	A	4/26/2017	11	201704269053479891	1/1/2016	12/31/2016	\$1,050

F3XA	YE	A	4/27/2017	13	201704279053482633	11/29/2016	12/31/2016	\$313,705	(\$4,068)	\$94,003	\$215,633	\$0
F1	M		1/22/2016	3	201601220300041056							
F1MN			1/15/2016	1	201601159004507911							
F1A	A		2/25/2015	5	15950832305							
Totals								\$3,024,519	\$2,808,885			

O-Index (2013-2014)

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Treasurer Name: KILGORE, PAUL Address: 1155 15TH ST NW WASHINGTON, DC 20005

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RQ7	30G		12/19/2014	2	14330070539	11/14/2014	11/24/2014	12/19/2014							
F3XN	30G	N	12/23/2014	5		14953218739		11/4/2014	11/24/2014		\$0	\$0			\$0
F3XN	YE	N	1/28/2015	5		15950120561		11/25/2014	12/31/2014		\$0	\$0			\$0
F1	N		11/4/2014	6	14031333880										
F1A	A		12/31/2014	4	14953223035										
Totals									\$0	\$0					

SEAL PAC Supporting Electing American Leaders PAC (C00570226)
2017 Mid-Year Report/Amended 2017 Mid-Year Report

Overview of Additional Receipts

Report Line	Original 2017 Mid-Year Report (Image 201707309069853422)	Amended 2017 Mid-Year Report, received 1/31/2018 (Image 201801319091112998)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$243,592.26	\$301,938.25	\$58,345.99
Line 11(a)(ii): Unitemized Contributions from Individuals	\$171,661.10	\$721,091.13	\$549,430.03
Total:			\$607,776.02