

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 18, 2019

ANALYST: Christopher Morse

I. COMMITTEE: Americans for the Cure of Breast Cancer
C00660233
Robert Piaro, Treasurer
N19 W24400 Riverwood Dr., Ste 350
Waukesha, WI 53118

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)

Americans for the Cure of Breast Cancer (“the Committee”) amended its 2018 July Quarterly Report to disclose additional disbursements totaling \$631,486.90, which were not disclosed on the original report (Attachment 2).

On July 15, 2018, the Committee filed the original 2018 July Quarterly Report covering the period from April 1, 2018 through June 30, 2018. The report disclosed \$0.00 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 201807159115526957, Attachment 2).

On September 27, 2018, the Committee filed an Amended July Quarterly Report. The report disclosed \$631,423.40 in disbursements on Line 21(b) of the Detailed Summary Page (Image 201809279124251155).

On October 17, 2018, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2018 July Quarterly Report, received September 27, 2018. The RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2018 July Quarterly Report (Image 201810170300021730).

On November 14, 2018, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the Amended 2018 July Quarterly Report, received September 27, 2018. The Committee stated:

“I just simply forgot to enter expenditures for the quarter. We took care through the July Amendment filing (FEC-1264181)”
(Image 201811149133678672).

On November 30, 2018, Reports Analysis Division (RAD) Analyst called Robert Piaro, the Committee’s Treasurer, regarding the RFAI on the Amended 2018 July Quarterly Report, received September 27, 2018. The RAD Analyst explained that the Committee may be referred to another office within the Commission for potential enforcement action. The Analyst stated that the Committee could file an FEC Form 99 with any additional information about the increase in activity. Mr. Piaro explained that he did not think there was any additional information to share outside of the FEC Form 99 filed November 14, 2018 (Attachment 3).

On December 18, 2018, the Committee filed an Amended July Quarterly Report. The report disclosed \$631,486.90 in disbursements on Line 21(b) of the Detailed Summary page, an increase of \$631,486.60 from the original report (Image 201812189143570049, Attachment 2).

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

No records were found for this cycle.

O-Index (2017-2018)

Cmte. Name: AMERICANS FOR THE CURE OF BREAST CANCER
Cmte. ID: C00550233

Treasurer Name: ROBERT PIARO Address: N119 W24440 RIVERWOOD DR STE 150 WAUKESHA WI 53118

AGREEMENT IN THE ENVIRONMENTAL COMMITTEE

Q-Index (2015-2016)

CMTE: Name: AMERICANS FOR THE CURE OF BREAST CANCER
CMTE: ID: C006660233

Treasurer Name: ROBERT PIARO
Address: N19 W24400 RIVERWOOD DR STE 350 WAUKESHA WI 53118

COMMITTEE: Cmts Decision: 11/11/2013: 1102480 RIVERWOOD

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Attachment 1

Americans for the Cure of Breast Cancer (C00660233)
2018 July Quarterly Report/Amended 2018 July Quarterly Report

Overview of Additional Disbursements

Report Line	Original 2018 July Quarterly Report (Image 201807159115526957)	Amended 2018 July Quarterly Report, received 12/18/2018 (Image 201812189143570049)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$0.00	\$631,486.90	\$631,486.90
Total:			\$631,486.90