

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.

O-Index (2019-2020)															
Cmte. ID: C00660233 Cmte. Name: AMERICANS FOR THE CURE OF BREAST CANCER															
Treasurer Name: ROBERT PIARO Address: N19 W24400 RIVERWOOD DR STE 350, WAUKESHA, WI 53118															
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	Debits & Loans

No records were found for this cycle.

O-Index (2017-2018)															
Cmte. ID: C00660233 Cmte. Name: AMERICANS FOR THE CURE OF BREAST CANCER															
Treasurer Name: ROBERT PIARO Address: N19 W24400 RIVERWOOD DR STE 350, WAUKESHA, WI 53118															
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MS-T			6/27/2018	1	201806279115195309										
MS-T			10/5/2018	1	201810059124377828										
MS-T			11/14/2018	1	201811149133678672										
RQ7	YE		2/20/2018	2	201802200300101076	11/9/2017	12/31/2017	2/20/2018							
RQ2	Q1	N	5/3/2018	2	201805030300009418	1/1/2018	3/31/2018	5/3/2018							
RQ2	Q2	A	10/17/2018	2	201810170300021730	4/1/2018	6/30/2018	10/17/2018							
RQ7	30G		12/20/2018	2	201812200300028468	10/1/2018	10/17/2018	12/20/2018							
F3XN	YE	N	9/24/2018	5	201809249124237793	10/1/2017	12/31/2017		\$0	\$0	\$0	\$0	\$0		\$0
F3XN	Q1	N	4/15/2018	10	201804159108190217	1/1/2018	3/31/2018		\$312	\$196,780	\$134,775	\$62,316			\$0
F3XA	Q1	A	6/4/2018	13	201806049113640264	1/1/2018	3/31/2018		\$312	\$196,780	\$134,775	\$62,316			\$0
F3XA	Q1	A	9/27/2018	15	201809279124251137	1/1/2018	3/31/2018		\$0	\$187,037	\$134,775	\$52,261	\$822		\$822
F3XA	Q1	A	12/18/2018	15	201812189143570031	1/1/2018	3/31/2018		\$0	\$187,037	\$134,775	\$52,261	\$822		\$822
F3XN	Q2	N	7/15/2018	8	201807159115526994	4/1/2018	6/30/2018		\$62,316	\$747,025	\$0	\$809,341			\$0
F3XA	Q2	A	9/27/2018	60	201809279124251152	4/1/2018	6/30/2018		\$61,999	\$746,180	\$631,423	\$176,756	\$225		\$225
F3XA	Q2	A	12/18/2018	62	201812189143570046	4/1/2018	6/30/2018		\$52,261	\$679,977	\$631,486	\$100,751	\$225		\$225
F3XN	Q3	N	10/11/2018	72	201810119124486065	7/1/2018	9/30/2018		\$176,147	\$279,991	\$300,628	\$155,509			\$0
F3XA	Q3	A	12/19/2018	72	201812199143584761	7/1/2018	9/30/2018		\$100,751	\$283,686	\$300,628	\$83,808			\$0
F3XN	12G	N	1/3/2019	17	201901039143706204	10/1/2018	10/17/2018		\$83,808	\$27,078	\$23,519	\$87,368			\$0
F3XN	30G	N	12/6/2018	35	201812069134550882	10/18/2018	11/26/2018		\$155,509	\$112,906	\$94,872	\$173,543			\$0
F3XA	30G	A	12/19/2018	35	201812199143585237	10/18/2018	11/26/2018		\$83,808	\$116,899	\$94,872	\$105,835			\$0
F3XA	30G	A	1/3/2019	35	201901039143706243	10/18/2018	11/26/2018		\$87,368	\$112,906	\$94,872	\$105,401			\$0
F3XN	YE	N	1/24/2019	28	201901249143974804	11/27/2018	12/31/2018		\$105,401	\$58,978	\$79,877	\$84,502			\$0
F1		A	3/27/2018	3	201804050300200061										
F1A		A	9/11/2018	6	201809119121694982										
F1N		N	11/9/2017	7	201711099086619762										
Totals										\$1,349,663	\$1,265,160				

O-Index (2015-2016)															
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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