

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 12, 2017

ANALYST: Kevin McQueen

- I. COMMITTEE: Mississippi Democratic Party
(C00149641)
Ryan Brown, Treasurer
PO Box 1583
Jackson, MS 39215
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)
11 CFR § 104.3

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Mississippi Democratic Party ("the Committee") amended its 2016 August Monthly Report to disclose additional receipts totaling \$200,000.00 and additional disbursements totaling \$200,000.00, which were not disclosed on the original report (Attachment 2).

On August 20, 2016, the Committee filed the original 2016 August Monthly Report covering the period of July 1, 2016 through July 31, 2016. The report disclosed \$610,045.00 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 201608209023472063, Attachment 2). The report also disclosed \$600,000.00 in disbursements on Line 22 (Transfers to Affiliated/Other Party Committees) of the Detailed Summary Page (Image 201608209023472064, Attachment 2).

On September 20, 2016, the Committee filed an Amended 2016 August Monthly Report. The report disclosed \$810,045.00 in receipts on Line 12, an increase of \$200,000.00 in receipts from the original report (Image 201609209032013773, Attachment 2). The report also disclosed \$800,000.00 in disbursements on Line 22, an

increase of \$200,000.00 in disbursements from the original report (Image 201609209032013774, Attachment 2).

On April 10, 2017, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2016 August Monthly Report, received September 20, 2016. The RAI requested clarification regarding the increase in receipts and the increase in disbursements disclosed on the Amended 2016 August Monthly Report (Image 201704100300084007).

On May 15, 2017, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") with text that stated:

"This is in repsonse [sic] to the Commission's request for additional information filed on April 10, 2017 regarding the Amended August Monthly. These increases represent transfers by the Hillary Victory Fund coming from a segregated bank account that were inadvertently misreported on the initial filing. Upon further inspection, the party re-filed to accurately reflect the public record" (Image 201705159053883646).

On June 29, 2017, the Reports Analysis Division (RAD) Analyst called the Committee and spoke to Jennifer May, the Designated Agent for the Committee. The Analyst told Ms. May the increased activity on the Amended 2016 August Monthly Report, received September 20, 2016, may be referred for potential further action. The Analyst stated that the Committee could file an FEC Form 99 if there was any further information to disclose about the increase in activity. Ms. May said she would consult with the attorneys for the Committee, but that it was unlikely the Committee would submit any further clarifications regarding the matter (Attachment 3).

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

O-Index (2017-2018)															
Cmte. ID: C00149641 Cmte. Name: MISSISSIPPI DEMOCRATIC PARTY															
Treasurer Name: BROWN, RYAN Address: PO BOX 1583, JACKSON, MS 39215															
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER															
Form Tr	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			5/1/2017	1	201705019053480315										
MS-T			5/15/2017	1	201705159053883846										
MS-T			5/15/2017	1	201705159053883839										
MS-T			5/15/2017	1	201705159053884235										
MS-T			5/19/2017	1	201705199054029742										
F3XN	M2	N	2/17/2017	18	201702178049724342	1/1/2017	1/31/2017		\$763	\$31,580	\$14,372	\$17,971			\$0
F3XN	M3	N	3/20/2017	22	201703209050899921	2/1/2017	2/28/2017		\$17,971	\$18,476	\$28,250	\$8,197			\$0
F3XN	M4	N	4/20/2017	20	201704209052386733	3/1/2017	3/31/2017		\$8,197	\$16,023	\$18,760	\$5,460			\$0
F3XN	M5	N	5/19/2017	18	201705199054030018	4/1/2017	4/30/2017		\$5,460	\$16,118	\$12,346	\$9,232			\$0
F3XN	M6	N	6/20/2017	19	201706209063589423	5/1/2017	5/31/2017		\$9,232	\$17,483	\$15,388	\$11,327			\$0
F3XN	M7	N	7/20/2017	22	201707209067009133	6/1/2017	6/30/2017		\$11,327	\$14,604	\$11,985	\$13,946			\$0
F3XN	M8	N	8/20/2017	25	201708209071104895	7/1/2017	7/31/2017		\$13,946	\$18,339	\$11,070	\$21,215			\$0
F3XN	M9	N	9/20/2017	26	201709209074818068	8/1/2017	8/31/2017		\$21,215	\$22,972	\$23,206	\$20,980			\$0
F3XN	M10	N	10/20/2017	23	201710209075858966	9/1/2017	9/30/2017		\$20,980	\$20,610	\$18,123	\$22,466			\$0
F3XN	M11	N	11/20/2017	24	201711209086788905	10/1/2017	10/31/2017		\$24,830	\$17,780	\$19,621	\$22,969			\$0
F1A		A	2/10/2017	6	201702109049342160										
F1A		A	10/27/2017	6	201710279076682221										
F1A		A	4/20/2017	6	201704209052368966										
Totals										\$193,968	\$174,126				

O-Index (2015-2016)														
Cmte. ID: C00149641 Cmte. Name: MISSISSIPPI DEMOCRATIC PARTY														
Treasurer Name: BROWN, RYAN Address: PO BOX 1583, JACKSON, MS 39215														
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER														
Form Tr	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			8/9/2015	1	201508099000810167									
MS-T			8/13/2015	1	201508139000818882									
RQ2	M6	A	1/31/2016	2	201601310300009725	5/1/2015	5/31/2015	1/31/2016						
RQ2	M6	N	5/15/2015	2	201509150300004861	5/1/2015	5/31/2015	6/15/2015						
RQ2	YE	N	4/10/2017	2	2017041003000084003	12/1/2015	12/31/2015	4/10/2017						
RQ2	M2	N	4/10/2017	2	2017041003000084005	1/1/2016	1/31/2016	4/10/2017						
RQ2	M8	A	4/10/2017	2	2017041003000084007	7/1/2016	7/31/2016	4/10/2017						
RQ2	M9	N	3/27/2017	2	2017032703000083230	8/1/2016	8/31/2016	3/27/2017						
RQ2	M10	N	4/10/2017	3	2017041003000084019	9/1/2016	9/30/2016	4/10/2017						
RQ2	30G	N	4/10/2017	2	2017041003000084022	10/20/2016	11/28/2016	4/10/2017						
RQ2	YE	N	3/15/2017	3	2017031603000082742	11/29/2016	12/31/2016	3/15/2017						
F3XN	M2	N	2/20/2015	19	15970274167	1/1/2015	1/31/2015		\$7,817	\$11,790	\$17,578	\$2,030		\$0
F3XN	M3	N	3/20/2015	17	15950898952	2/1/2015	2/28/2015		\$2,030	\$14,826	\$14,867	\$1,988		\$0
F3XA	M3	A	8/15/2016	18	201608159022252122	2/1/2015	2/28/2015		\$2,030	\$14,826	\$14,867	\$1,988		\$0
F3XN	M4	N	4/19/2015	26	15970373015	3/1/2015	3/31/2015		\$1,988	\$15,074	\$16,525	\$537		\$0
F3XA	M4	A	8/15/2016	25	201608159022252140	3/1/2015	3/31/2015		\$1,988	\$15,074	\$16,525	\$537		\$0
F3XN	M5	N	5/20/2015	18	15970711347	4/1/2015	4/30/2015		\$537	\$17,837	\$16,720	\$1,654		\$0
F3XA	M5	A	8/15/2016	21	201608159022252165	4/1/2015	4/30/2015		\$537	\$17,837	\$16,720	\$1,654		\$0
F3XN	M6	N	6/19/2015	22	15951510096	5/1/2015	5/31/2015		\$1,654	\$16,276	\$16,844	\$1,086		\$0

O-Index (2013-2014)																		
Cmte. ID: C00149641 Cmte. Name: MISSISSIPPI DEMOCRATIC PARTY																		
Treasurer Name: BROWN, RYAN Address: PO BOX 1583, JACKSON, MS 39215																		
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER																		
Form	Ip	Rpt	Tr	All	Recpt	Dt	Pgs	Begin Inlg#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debts & Loans
MS-T						12/11/2013	1	13943368929										
RQ2	M2	N				8/1/2013	2	13330033367	1/1/2013	1/31/2013	6/11/2013	-	-	-	-	-	-	-
RQ2	M6	N				9/7/2013	2	13330033849	5/1/2013	5/31/2013	9/7/2013	-	-	-	-	-	-	-
RQ2	M9	N				12/4/2013	3	13330041112	8/1/2013	8/31/2013	12/4/2013	-	-	-	-	-	-	-
RQ2	M10	N				12/4/2013	2	13330041116	9/1/2013	9/30/2013	12/4/2013	-	-	-	-	-	-	-
RQ2	M12	N				1/10/2014	2	14330042010	11/1/2013	11/30/2013	1/10/2014	-	-	-	-	-	-	-
RQ2	YE	N				5/9/2014	2	14330051698	12/1/2013	12/31/2013	5/9/2014	-	-	-	-	-	-	-
RQ2	M4	N				5/9/2014	2	14330051817	3/1/2014	3/31/2014	5/9/2014	-	-	-	-	-	-	-
RQ2	M9	N				10/28/2014	2	14330063309	8/1/2014	8/31/2014	10/28/2014	-	-	-	-	-	-	-
RQ2	M10	N				10/28/2014	4	14330063311	9/1/2014	9/30/2014	10/28/2014	-	-	-	-	-	-	-
F3XN	M2	N				2/20/2013	24	13961061370	1/1/2013	1/31/2013		\$14,037	\$20,661	\$19,949	\$14,749	\$5,700		\$5,700
F3XN	M3	N				3/20/2013	21	13961196937	2/1/2013	2/28/2013		\$14,699	\$11,378	\$17,381	\$8,696	\$5,700		\$5,700
F3XN	M4	N				4/20/2013	33	13940609960	3/1/2013	3/31/2013		\$8,696	\$34,022	\$39,365	\$13,353	\$5,700		\$5,700
F3XN	M5	N				5/19/2013	22	13962484378	4/1/2013	4/30/2013		\$13,353	\$12,542	\$22,597	\$3,298	\$5,700		\$5,700
F3XN	M6	N				6/19/2013	20	13962964241	5/1/2013	5/31/2013		\$3,298	\$23,564	\$16,408	\$10,456	\$5,700		\$5,700
F3XN	M7	N				7/20/2013	25	13964431918	6/1/2013	6/30/2013		\$10,340	\$17,464	\$17,341	\$10,464	\$5,700		\$5,700
F3XA	M7	A				8/13/2015	28	201508139000818797	8/1/2013	6/30/2013		\$10,340	\$17,464	\$17,341	\$10,464	\$5,700		\$5,700
F3XN	M8	N				8/20/2013	30	13941476332	7/1/2013	7/31/2013		\$10,464	\$25,262	\$27,791	\$7,935	\$5,700		\$5,700

O-Index

12/12/2017 9:09 AM

F3XN	M9	N	9/20/2013	32	13941634522	8/1/2013	8/31/2013	\$7,935	\$40,527	\$38,389	\$10,074	\$5,700	\$5,700
F3XA	M9	A	8/9/2015	30	201508090000810076	8/1/2013	8/31/2013	\$7,935	\$40,527	\$38,389	\$10,074	\$5,700	\$5,700
F3XA	M9	A	8/13/2015	30	2015081390000818200	8/1/2013	8/31/2013	\$7,935	\$40,527	\$38,389	\$10,074	\$5,700	\$5,700
F3XN	M10	N	10/20/2013	24	13942156763	9/1/2013	9/30/2013	\$10,074	\$10,754	\$17,347	\$3,481	\$5,700	\$5,700
F3XA	M10	A	8/9/2015	23	201508090000810110	9/1/2013	9/30/2013	\$10,074	\$13,299	\$19,892	\$3,481	\$5,700	\$5,700
F3XA	M10	A	8/13/2015	26	2015081390000818698	9/1/2013	9/30/2013	\$10,074	\$13,299	\$19,892	\$3,481	\$5,700	\$5,700
F3XN	M11	N	11/20/2013	30	13942556081	10/1/2013	10/31/2013	\$3,481	\$26,304	\$23,603	\$6,182	\$5,700	\$5,700
F3XA	M11	A	8/13/2015	29	2015081390000818825	10/1/2013	10/31/2013	\$3,481	\$26,304	\$23,603	\$6,182	\$5,700	\$5,700
F3XN	M12	N	12/20/2013	28	13944253644	11/1/2013	11/30/2013	\$6,182	\$20,009	\$18,586	\$7,605	\$5,700	\$5,700
F3XA	M12	A	8/13/2015	28	2015081390000818854	11/1/2013	11/30/2013	\$6,182	\$20,009	\$18,586	\$7,605	\$5,700	\$5,700
F3XN	YE	N	1/28/2014	33	14940131585	12/1/2013	12/31/2013	\$7,605	\$21,953	\$26,741	\$2,817	\$5,700	\$5,700
F3XA	YE	A	8/9/2015	33	201508090000810134	12/1/2013	12/31/2013	\$7,605	\$21,953	\$26,741	\$2,817	\$5,700	\$5,700
F3XN	M2	N	2/20/2014	22	14940531857	1/1/2014	1/31/2014	\$2,817	\$17,340	\$18,794	\$1,362	\$0	\$0
F3XN	M3	N	3/20/2014	21	14960521528	2/1/2014	2/28/2014	\$1,362	\$17,916	\$16,549	\$2,729	\$0	\$0
F3XN	M4	N	4/19/2014	25	14960854529	3/1/2014	3/31/2014	\$2,729	\$18,060	\$17,748	\$3,041	\$0	\$0
F3XN	M5	N	5/20/2014	27	14861180169	4/1/2014	4/30/2014	\$3,041	\$24,173	\$24,542	\$2,672	\$0	\$0
F3XN	M6	N	6/20/2014	22	14941622955	5/1/2014	5/31/2014	\$2,672	\$19,264	\$18,702	\$3,234	\$0	\$0
F3XN	M7	N	7/20/2014	31	14861695380	6/1/2014	6/30/2014	\$3,234	\$11,678	\$14,011	\$901	\$0	\$0
F3XN	M8	N	8/20/2014	31	14970690507	7/1/2014	7/31/2014	\$901	\$26,389	\$26,844	\$447	\$0	\$0
F3XN	M9	N	9/20/2014	22	14970891057	8/1/2014	8/31/2014	\$447	\$45,991	\$43,788	\$2,649	\$0	\$0
F3XA	M9	A	8/13/2015	22	2015081390000818890	8/1/2014	8/31/2014	\$447	\$45,991	\$43,788	\$2,649	\$0	\$0
F3XN	M10	N	10/20/2014	24	14951857523	9/1/2014	9/30/2014	\$2,649	\$25,387	\$19,570	\$8,465	\$0	\$0
F3XN	12G	N	10/22/2014	12	14952374774	10/1/2014	10/15/2014	\$8,465	\$13,833	\$12,186	\$10,112	\$0	\$0
F3XN	30G	N	12/4/2014	27	14952759358	10/16/2014	11/24/2014	\$10,112	\$22,894	\$26,797	\$6,210	\$0	\$0
F3XN	YE	N	1/31/2015	25	15950577490	11/25/2014	12/31/2014	\$6,210	\$17,274	\$15,667	\$7,817	\$0	\$0
F1A		A	6/17/2013	5	13962942782								
F1A		A	12/11/2013	5	13943366674								
Totals								\$527,195	\$533,250				

Mississippi Democratic Party (C00149641)

Additional Receipts by Line Number

2016 August Monthly Report/Amended 2016 August Monthly Report

Report Line	2016 August Monthly Report (Image 20160820902347 2063)	Amended 2016 August Monthly Report, received 09/20/16 (Image 201609209032013773)	Variance Amount
Line 12: Transfers from Affiliated/Other Party Committees	\$610,045.00	\$810,045.00	\$200,000.00
Total:			\$200,000.00

Additional Disbursements by Line Number

2016 August Monthly Report/Amended 2016 August Monthly Report

Report Line	2016 August Monthly Report (Image 20160820902347 2064)	Amended 2016 August Monthly Report, received 09/20/16 (Image 201609209032013774)	Variance Amount
Line 22: Transfers to Affiliated/Other Party Committees	\$600,000.00	\$800,000.00	\$200,000.00
Total:			\$200,000.00