

19L-10

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 7, 2019

ANALYST: Sean Krieger

I. COMMITTEE: United Mine Workers of America Power
PAC
C00489203
Levi Allen, Treasurer
18354 Quantico Gateway Drive #200
Triangle, VA 22172

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)

United Mine Workers of America Power PAC (“the Committee”) amended its 2018 July Quarterly Report to disclose additional receipts totaling \$360,000.00, which were not disclosed on the original report (Attachment 2).

On July 16, 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 receipts on line 11(a)(i) (Itemized Contributions from Individuals) of the Detailed Summary Page (Image 201807169115718689).

On October 25, 2018, the Committee filed an Amended 2018 July Quarterly Report. The Report disclosed \$360,000.00 in receipts on line 11(a)(i) in receipts of the Detailed Summary Page, an increase of \$360,000.00 from the original report (Image 201810259130895385).

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United Mine Workers of America Power PAC
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On February 3, 2019, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2018 July Quarterly Report, received October 25, 2018. The RAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2018 July Quarterly Report (Image 201902030300030055).

On March 8, 2019, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RAI referencing the Amended 2018 July Quarterly Report, received October, 25 2018. The committee stated:

“This is in response to the Request for Information we received on our Amended July Quarterly Report filed on October 25, 2018. When filing the next report after filing the July quarterly report the first time, the Fund had a negative balance which brought to our attention that the funding wired from our affiliation union had not been reported. The error was immediately corrected with the amendment” (Image 201903089145645996).

On March 15, 2019, the Reports Analysis Division (RAD) Analyst called Mary Ann Delbalzo, the Committee Comptroller, regarding the RAI on the Amended 2018 July Quarterly Report, received October 25, 2018. The Analyst explained that the Committee could be referred to another office for further action. Ms. Delbalzo asked the Analyst what further information the Commission required. The Analyst explained that any filings on the public record would be taken into consideration, and that the Committee could file an FEC Form 99 with any additional information the Committee deemed pertinent for the Commission to consider. Ms. Delbalzo explained that she did not believe there to be any further information relating to the issue, but explained that she would file any reports as necessary if more information did present itself (Attachment 3).

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

| O-Index (2019) | | | | | | | | | | | | | | | |
|--|--------|-----|-----------|--|--------------------|------------|------------|-----------------------------------|------------|----------------|----------------|----------|-------|-------|---------------|
| Cmte. ID: C00489203 | | | | Cmte. Name: UNITED MINE WORKERS OF AMERICA POWER PAC | | | | | | | | | | | |
| Treasurer Name: ALLEN, LEVI | | | | Address: 18354 QUANTICO GATEWAY DRIVE #200, TRIANGLE, VA 22172 | | | | | | | | | | | |
| 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 | Ltrr Mail Dt | Begin Cash | Recpts | Disb | End Cash | Debts | Loans | Debts & Loans |
| MS-T | | | 3/8/2019 | 1 | 201903089145645996 | | | | - | - | - | - | - | - | - |
| MS-T | | | 5/2/2019 | 1 | 201905029149610934 | | | | - | - | - | - | - | - | - |
| RQ2 | 48 | | 2/3/2019 | 2 | 201902030300030049 | | | 2/3/2019 | - | - | - | - | - | - | - |
| F3XN | Q1 | N | 4/4/2019 | 7 | 201904049146006416 | 1/1/2019 | 3/31/2019 | | \$758 | \$8,200 | \$8,719 | \$239 | - | - | \$0 |
| F3XA | Q1 | A | 4/29/2019 | 7 | 201904299149603469 | 1/1/2019 | 3/31/2019 | | \$758 | \$8,200 | \$8,719 | \$239 | - | - | \$0 |
| Totals | | | | | | | | | | \$8,200 | \$8,719 | | | | |

| O-Index (2017-2018) | | | | | | | | | | | | | | | |
|--|--------|-----|------------|--|--------------------|------------|------------|-----------------------------------|-------------|------------------|------------------|-------------|-------|-------|---------------|
| Cmte. ID: C00489203 | | | | Cmte. Name: UNITED MINE WORKERS OF AMERICA POWER PAC | | | | | | | | | | | |
| Treasurer Name: ALLEN, LEVI | | | | Address: 18354 QUANTICO GATEWAY DRIVE #200, TRIANGLE, VA 22172 | | | | | | | | | | | |
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| Form Tp | Rpt Tp | A/I | Recpt Dt | Pgs | Begin Img# | Beg Cvg Dt | End Cvg Dt | Ltrr Mail Dt | Begin Cash | Recpts | Disb | End Cash | Debts | Loans | Debts & Loans |
| RQ2 | Q1 | N | 6/27/2017 | 2 | 201706280300087585 | 1/1/2017 | 3/31/2017 | 6/27/2017 | - | - | - | - | - | - | - |
| RQ2 | Q3 | N | 11/1/2017 | 2 | 201711020300093984 | 7/1/2017 | 9/30/2017 | 11/1/2017 | - | - | - | - | - | - | - |
| RQ2 | Q2 | A | 2/3/2019 | 2 | 201902030300030055 | 4/1/2018 | 6/30/2018 | 2/3/2019 | - | - | - | - | - | - | - |
| RQ2 | Q2 | N | 10/24/2018 | 2 | 201810240300022410 | 4/1/2018 | 6/30/2018 | 10/24/2018 | - | - | - | - | - | - | - |
| RQ2 | Q3 | N | 3/11/2019 | 2 | 201903110300035066 | 7/1/2018 | 9/30/2018 | 3/11/2019 | - | - | - | - | - | - | - |
| RQ2 | 12G | N | 4/7/2019 | 4 | 201904070300036716 | 10/1/2018 | 10/17/2018 | 4/7/2019 | - | - | - | - | - | - | - |
| RQ2 | 30G | A | 4/21/2019 | 3 | 201904210300037706 | 10/18/2018 | 11/26/2018 | 4/21/2019 | - | - | - | - | - | - | - |
| RQ2 | YE | N | 4/11/2019 | 2 | 201904110300037105 | 11/27/2018 | 12/31/2018 | 4/11/2019 | - | - | - | - | - | - | - |
| F3XN | Q1 | N | 4/14/2017 | 5 | 201704149052150823 | 1/1/2017 | 3/31/2017 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q2 | N | 7/21/2017 | 5 | 201707219067134373 | 4/1/2017 | 6/30/2017 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q3 | N | 10/18/2017 | 5 | 201710189075790651 | 7/1/2017 | 9/30/2017 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | YE | N | 1/3/2018 | 5 | 201801039090364209 | 10/1/2017 | 12/31/2017 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q1 | N | 4/11/2018 | 5 | 201804119106280245 | 1/1/2018 | 3/31/2018 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q2 | N | 7/16/2018 | 6 | 201807169115718687 | 4/1/2018 | 6/30/2018 | | \$6,664 | \$0 | \$358,658 | (\$351,993) | - | - | \$0 |
| F3XA | Q2 | A | 10/25/2018 | 7 | 201810259130895383 | 4/1/2018 | 6/30/2018 | | \$6,664 | \$360,000 | \$358,658 | \$8,006 | - | - | \$0 |
| F3XN | Q3 | N | 10/5/2018 | 5 | 201810059124321469 | 7/1/2018 | 9/30/2018 | | (\$351,993) | \$0 | \$0 | (\$351,993) | - | - | \$0 |
| F3XA | Q3 | A | 3/15/2019 | 5 | 201903159145709138 | 7/1/2018 | 9/30/2018 | | \$8,006 | \$0 | \$0 | \$8,006 | - | - | \$0 |
| F3XN | 12G | N | 3/22/2019 | 8 | 201903229145920711 | 10/1/2018 | 10/17/2018 | | \$8,006 | \$79,200 | \$78,737 | \$8,468 | - | - | \$0 |
| F3XA | 12G | A | 4/29/2019 | 8 | 201904299149603449 | 10/1/2018 | 10/17/2018 | | \$8,006 | \$79,200 | \$78,737 | \$8,468 | - | - | \$0 |
| F3XN | 30G | N | 12/5/2018 | 9 | 201812059134134218 | 10/1/2018 | 11/26/2018 | | \$8,006 | \$79,200 | \$85,232 | \$1,973 | - | - | \$0 |
| F3XA | 30G | A | 3/14/2019 | 10 | 201903149145705013 | 10/1/2018 | 11/26/2018 | | \$8,006 | \$79,200 | \$86,447 | \$758 | - | - | \$0 |
| F3XA | 30G | A | 3/22/2019 | 7 | 201903229145920704 | 10/18/2018 | 11/26/2018 | | \$8,468 | \$0 | \$7,710 | \$758 | - | - | \$0 |
| F3XA | 30G | A | 4/29/2019 | 7 | 201904299149603457 | 10/18/2018 | 11/26/2018 | | \$8,468 | \$0 | \$7,710 | \$758 | - | - | \$0 |
| F3XN | YE | N | 1/31/2019 | 5 | 201901319144286452 | 11/27/2018 | 12/31/2018 | | \$1,973 | \$0 | \$0 | \$1,973 | - | - | \$0 |
| F3XA | YE | A | 4/19/2019 | 5 | 201904199149541086 | 11/27/2018 | 12/31/2018 | | \$758 | \$0 | \$0 | \$758 | - | - | \$0 |
| F3XA | YE | A | 4/29/2019 | 5 | 201904299149603464 | 11/27/2018 | 12/31/2018 | | \$758 | \$0 | \$0 | \$758 | - | - | \$0 |
| F1A | | A | 6/29/2017 | 4 | 201706299066460577 | | | | - | - | - | - | - | - | - |
| F1A | | A | 11/6/2017 | 4 | 201711069086611562 | | | | - | - | - | - | - | - | - |
| Totals | | | | | | | | | | \$439,200 | \$445,105 | | | | |

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5/7/2019 12:06 PM

| Cmte. ID: C00489203 Cmte. Name: UNITED MINE WORKERS OF AMERICA POWER PAC Treasurer Name: ALLEN, LEVI Address: 18354 QUANTICO GATEWAY DRIVE #200, TRIANGLE, VA 22172 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 | Debts | Loans | Debts & Loans |
| RQ7 | 30G | | 12/28/2016 | 2 | 201612280300071512 | 10/1/2016 | 11/28/2016 | 12/28/2016 | - | - | - | - | - | - | - |
| F3XN | Q1 | N | 4/15/2015 | 5 | 15951158955 | 1/1/2015 | 3/31/2015 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q2 | N | 7/8/2015 | 5 | 201507089000064267 | 4/1/2015 | 6/30/2015 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q3 | N | 10/14/2015 | 5 | 201510149002897901 | 7/1/2015 | 9/30/2015 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | YE | N | 1/29/2016 | 5 | 201601299004788548 | 10/1/2015 | 12/31/2015 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q1 | N | 4/18/2016 | 5 | 201604189012571876 | 1/1/2016 | 3/31/2016 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q2 | N | 7/14/2016 | 5 | 201607149020458528 | 4/1/2016 | 6/30/2016 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | Q3 | N | 10/4/2016 | 5 | 201610049032162915 | 7/1/2016 | 9/30/2016 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | 30G | N | 12/29/2016 | 5 | 201612299040906770 | 10/1/2016 | 11/28/2016 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| F3XN | YE | N | 1/27/2017 | 5 | 201701279041523887 | 11/29/2016 | 12/31/2016 | | \$6,664 | \$0 | \$0 | \$6,664 | - | - | \$0 |
| Totals | | | | | | | | | | \$0 | \$0 | | | | |

United Mine Workers of America Power PAC (C00489203)
 2018 July Quarterly Report/ Amended 2018 July Quarterly Report

Overview of Additional Receipts

| Report Line | Original 2018 July Quarterly Report (Image 201807169115718689) | Amended 2018 July Quarterly Report, received 10/25/2018 (Image 201810259130895385) | Variance Amount |
|--|---|---|----------------------------|
| Line 11(a)(i): Itemized Contributions from Individuals | \$0.00 | \$360,000.00 | \$360,000.00 |
| | | Total: | \$360,000.00 |