

19L-16

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: July 9, 2019

ANALYST: Romy Adame-Wilson

I. COMMITTEE: Million More Voters, Sponsored by the
California Labor Federation, AFL-CIO
C00687624
Art Pulaski, Treasurer
555 Capitol Mall, Suite 400
Sacramento, CA 95814

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(8)
11 CFR § 104.3(d)

III. BACKGROUND:

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

Million More Voters, Sponsored by the California Labor Federation, AFL-CIO (“the Committee”) amended its 2018 October Quarterly Report to disclose newly incurred debts totaling \$196,452.00, which were not disclosed on the original report (Attachment 2).

On October 15, 2018, the Committee filed the original 2018 October Quarterly Report covering the period from July 1, 2018 through September 30, 2018. The report disclosed no debts on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Image 201810159125409342, Attachment 2).

On December 17, 2018, the Committee filed an Amended 2018 October Quarterly Report. The report disclosed \$196,452.00 in newly incurred debts on Line 10, a total increase in debts of \$196,452.00 from the original report (Image 201812179143565334, Attachment 2).

On March 17, 2019, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2018 October Quarterly Report, received December

RAD Referral 19L-16

Million More Voters, Sponsored by the California Labor Federation, AFL-CIO

Page 2 of 2

17, 2018. The RFAI requested clarification regarding the substantial increase in debts disclosed on the Amended 2018 October Quarterly Report (Image 201903170300035633).

On May 16, 2019, the Reports Analysis Division (RAD) Analyst spoke with Emily Andrews, a representative of the Committee. The RAD Analyst explained that the Committee could be referred for potential further action. The Analyst stated that the Committee could file an FEC Form 99 (Miscellaneous Electronic Submission) with any additional information about the increase in activity. Ms. Andrews explained that the increase in debts were related to invoices received late by the Committee. She also explained that all of the additional activity was related to state level, non-federal activity. She said the Committee would provide that explanation in a FEC Form 99 (Attachment 3).

On May 20, 2019, the Committee filed a FEC Form 99 in response to the RFAI referencing the Amended 2018 October Quarterly Report, received December 17, 2018. The Committee stated, in part:

“I serve as campaign counsel to the above named committee, and write in response to the request for additional information dated March 17, 2019. The request notes that the committee?s amended report disclosed an increase in debts owed to one or more vendors totaling \$196,452.00.

The committee is simultaneously registered with the California Secretary of State and the Federal Election Commission, and has been in existence and filing reports in California in 2006. In 2018, in anticipation of engaging in federal independent expenditures, the committee registered with the Federal Election Commission and disclosed all expenditures as required.

The committee?s amended report disclosed additional debts from three vendors, none of which relate to the committee?s federal activities. Because the committee simultaneously discloses all state and federal activity on its federal report, the committee amended the federal report to disclose the additional debts owed to Political Data, Inc., Signified Media Group, and David Binder Research once the committee became aware of these invoices. All federal debts and expenditures were timely disclosed in advance of the election as required” (Image 201905209149783050).

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

| O-Index (2019) | | | | | | | | | | | | | | | |
|----------------|--------|--|-----------|-----|--------------------|------------|------------|-------------|------------|--------|------|----------|-------|-------|---------------|
| | | Cmte. ID: C00687624 Cmte. Name: MILLION MORE VOTERS, SPONSORED BY THE CALIFORNIA LABOR FEDERATION, AFL-CIO | | | | | | | | | | | | | |
| | | Treasurer Name: PULASKI, ART Address: 555 CAPITOL MALL, SUITE 400, SACRAMENTO, CA 95814 | | | | | | | | | | | | | |
| | | 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 |
| MS-T | | | 5/20/2019 | 1 | 201905209149783050 | | | | - | - | - | - | - | - | - |
| Totals | | | | | | | | | | \$0 | \$0 | | | | |

| O-Index (2017-2018) | | | | | | | | | | | | | | | |
|---------------------|--------|--|------------|-----|--------------------|------------|------------|-------------|-------------|-------------|-------------|-------------|-----------|-------|---------------|
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| 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 |
| MS-T | | | 9/18/2018 | 1 | 201809189121748710 | | | | - | - | - | - | - | - | - |
| MS-T | | | 10/15/2018 | 1 | 201810159125409394 | | | | - | - | - | - | - | - | - |
| RQ2 | Q3 | A | 3/17/2019 | 2 | 201903170300035633 | 7/1/2018 | 9/30/2018 | 3/17/2019 | - | - | - | - | - | - | - |
| RQ2 | Q3 | N | 11/29/2018 | 2 | 201811290300026075 | 7/1/2018 | 9/30/2018 | 11/29/2018 | - | - | - | - | - | - | - |
| F3XN | Q3 | N | 10/15/2018 | 25 | 201810159125409341 | 7/1/2018 | 9/30/2018 | | \$0 | \$5,162,407 | \$86,345 | \$5,076,062 | - | - | \$0 |
| F3XA | Q3 | A | 12/17/2018 | 27 | 201812179143565333 | 7/1/2018 | 9/30/2018 | | \$0 | \$5,162,407 | \$86,345 | \$5,076,062 | \$196,452 | - | \$196,452 |
| F3XN | 12G | N | 10/25/2018 | 10 | 201810259133476173 | 10/1/2018 | 10/17/2018 | | \$5,076,062 | \$0 | \$249,608 | \$4,826,453 | \$40,507 | - | \$40,507 |
| F3XA | 12G | A | 12/17/2018 | 11 | 201812179143565360 | 10/1/2018 | 10/17/2018 | | \$5,076,062 | \$0 | \$249,608 | \$4,826,453 | \$241,459 | - | \$241,459 |
| F3XN | 30G | N | 12/6/2018 | 19 | 201812069135013329 | 10/18/2018 | 11/26/2018 | | \$4,826,453 | \$529,913 | \$824,391 | \$4,531,974 | \$167,743 | - | \$167,743 |
| F3XN | YE | N | 1/30/2019 | 16 | 201901309144214194 | 11/27/2018 | 12/31/2018 | | \$4,531,974 | \$169,586 | \$68,339 | \$4,633,222 | \$159,745 | - | \$159,745 |
| F1N | | N | 9/17/2018 | 4 | 201809179121730033 | | | | - | - | - | - | - | - | - |
| F1A | | A | 12/21/2018 | 13 | 201812219143660608 | | | | - | - | - | - | - | - | - |
| Totals | | | | | | | | | | \$5,861,907 | \$1,228,685 | | | | |

| O-Index (2015-2016) | | | | | | | | | | | | | | | |
|---------------------|--------|--|----------|-----|------------|------------|------------|-------------|------------|--------|------|----------|-------|-------|---------------|
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| 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 |

No records were found for this cycle.

**Million More Voters, Sponsored by the California Labor Federation, AFL-CIO
(C00548420)**

2018 October Quarterly Report/Amended 2018 October Quarterly Report

Overview of Additional Debts

| Report Line | Original 2018 October Quarterly Report (Image 2018101591254093 42) | Amended 2018 October Quarterly Report, received 12/17/2018 (Image 2018121791435653 34) | Debt Variance Amount | Increase in New Debts Incurred |
|--|---|---|---------------------------------|---|
| Amount Incurred This Period (Schedule D) | \$0.00 | \$196,452.00 | \$196,452.00 | \$196,452.00 |
| Outstanding Balance Beginning This Period (Schedule D) | \$0.00 | \$0.00 | \$0.00 | |
| Payments This Period (Schedule D) | \$0.00 | \$0.00 | 0.00 | |
| Outstanding Balance at Close of This Period | \$0.00 | \$196,452.00 | \$196,452.00 | |
| Line 10: Debts and Obligations Owed by the Committee | \$0.00 | \$196,452.00 | \$196,452.00 | |

**Million More Voters, Sponsored by the California Labor Federation, AFL-CIO
(C00548420)**

Amended 2018 October Quarterly Report (Images 201812179143565358-59)

Detailed Overview of New Debts Incurred

| Vendor | Beginning Outstanding Balance | Amount Incurred | Payments | Increase in Debt Incurred |
|------------------------|--|----------------------------|-----------------|--------------------------------------|
| David Binder Research | \$0.00 | \$130,000.00 | \$0.00 | \$130,000.00 |
| Pivotal Targeting, LLC | \$0.00 | \$22,952.00 | \$0.00 | \$22,952.00 |
| Political Data Inc. | \$0.00 | \$39,000.00 | \$0.00 | \$39,000.00 |
| Signified Media Group | \$0.00 | \$4,500.00 | \$0.00 | \$4,500.00 |
| Total | \$0.00 | \$196,452.00 | \$0.00 | \$196,452.00 |