

RAD Referral 19L-16

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

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**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 (RFAI) was sent to the Committee referencing the Amended 2018 October Quarterly Report, received December

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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				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$0</b>	<b>\$0</b>				

**O-Index (2017-2018)**  
**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			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				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$5,861,907</b>	<b>\$1,228,685</b>				

**O-Index (2015-2016)**  
**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**

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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	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
<b>Total</b>	<b>\$0.00</b>	<b>\$196,452.00</b>	<b>\$0.00</b>	<b>\$196,452.00</b>