

19L-24

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: August 7, 2019

ANALYST: Kevin Fortkiewicz

I. COMMITTEE: Michigan Republican Party
C00041160
Carl Meyers, Treasurer
520 Seymour Avenue
Lansing, MI 48933

II. RELEVANT STATUTE: 52 U.S.C § 30104(g)(1)
11 CFR § 104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to File 24-Hour Reports)

Michigan Republican Party (“the Committee”) failed to file one (1) 24-Hour Report totaling \$499,950.00 to support one (1) independent expenditure disclosed on the 2018 30-Day Post-General Report, made after the 20th day but more than 24 hours before the 2018 General Election (Attachment 2).

On December 6, 2018, the Committee filed the 2018 30-Day Post-General Report, covering the period from October 18, 2018 through November 26, 2018, which included a Schedule E (Itemized Independent Expenditures) disclosing thirty-six (36) independent expenditures totaling \$2,310,976.48 made in support of and in opposition to ten (10) Federal candidates. The Committee failed to file one (1) 24-Hour Report to support one (1) independent expenditure, made in support of one (1) Federal candidate, totaling \$499,950.00 for the 2018 General Election (Images 201812069134578341-358, Attachment 2).

On April 7, 2019, a Request for Additional Information (RAFI) was sent to the Committee referencing the 2018 30-Day Post-General Report. Among other items, the

RFAI noted that the Committee may have failed to file one or more of the required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$499,950.00, for which a 24-Hour Report had not been filed (Images 201904070300036684-6).

On April 24, 2019, the Committee filed an Amended 2018 30-Day Post-General Report. The report contained no changes to Schedule E from the original report (Images 201904249149587127-144).

Also on April 24, 2019, the Committee submitted an FEC Form 99 (Miscellaneous Electronic Submission) which provided additional information in response to the RFAI referencing the 2018 30-Day Post-General Report. The FEC Form 99 stated, in part:

“REQUEST: Schedule E of your report indicates that your committee may have failed to file one or more of the required 24-hour report(s) regarding “last minute” independent expenditures.

RESPONSE: MRP (Michigan Republican Party) immediately purchased air time to ensure we did not lose availability. At that time, MRP was considering potentially working with the John James for Senate Campaign to produce a TV Ad—these were internal discussions which never were communicated with the John James for Senate Campaign. It was later decided to not coordinate with the John James for Senate Campaign and the MRP decided to produce our own ad in-house without the John James for Senate Campaign’s approval or knowledge. The disclaimer on the ad was for an Independent Expenditure, as it should have been. It was paid for with home grown funds but was not reported as a 24-hour disbursement. The failure to report on a 24-hour basis was based on a lack of communication internally and a change in facts between when the TV time was purchased and final decision for usage. Going forward, the MRP has placed control measures in place so that decisions on disbursements are made before the time of disbursement so this mistake cannot happen again. The Michigan Republican Party takes the Federal Election Regulations very seriously and always works to comply with the highest standards of the law” (Image 201904249149584636).

Also on April 24, 2019, Henrietta Tow, the Committee’s Accounting Director, called the Reports Analysis Division (RAD) Analyst. She explained that the Committee was going to file an FEC Form 99 to explain why the 24-Hour Report was not filed for the independent expenditure on the 2018 30 Day Post-General Report. Ms. Tow explained that the Committee took compliance very seriously (Attachment 3).

On May 2, 2019, Eric Doster, the Committee’s General Counsel, called the RAD Analyst to see if the Committee’s response to the RFAI would be considered adequate. The Analyst explained that he had seen the response to the RFAI, but needed further clarification regarding whether additional information was needed from the Committee. Mr. Doster indicated that the Committee took compliance very seriously and that the

Committee did not file the 24-Hour Report because they originally planned for it to be a coordinated expenditure. The Analyst explained that the dollar amount in question may require the issue to be looked at by an additional office at the Commission. Counsel explained he hoped the record of compliance by the Committee in the past would be taken into consideration (Attachment 3).

On May 16, 2019, the RAD Analyst called Ms. Tow to explain the missing 24-Hour Report cited in the RFAI on the 30 Day Post-General Report may be referred to another Commission office for potential further action. The Analyst explained the Committee could provide any additional information if they wished to do so. Ms. Tow explained that she was sorry about what had happened and that the Committee had put additional measures in place to ensure that this would not happen again. Additionally, she stated that she and the Executive Director planned to attend the FEC compliance training in Chicago. She further explained that the Committee likely would not provide any additional information as they clearly explained the issue in the FEC Form 99, submitted April 24, 2019. The Analyst confirmed that the Commission had received that FEC Form 99, and asked if he should also contact the General Counsel to the Committee regarding this issue since he had called for an update. Ms. Tow confirmed she would like the Analyst to call the General Counsel (Attachment 3).

The RAD Analyst called Mr. Doster on May 16, 2019, and left a message explaining the Committee may be referred to another Commission office for potential further action because of the missing 24-Hour Report on the 30 Day Post-General. The Analyst stated he had talked with the Accounting Director for the Committee regarding the issue and left his contact information for Mr. Doster. The General Counsel returned the phone call a few minutes later and stated that the Committee would wait to hear from the other Commission office to see what was required (Attachment 3).

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

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O-Index (2019-2020)															
Cmte. ID: C00041160 Cmte. Name: MICHIGAN REPUBLICAN PARTY															
Treasurer Name: MEYERS, CARL MR. Address: 520 SEYMOUR AVENUE, LANSING, MI 48933															
Cmte. Type: Y (QUALIFIED PARTY) 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-M			1/28/2019	1	201901289144016359				-	-	-	-	-	-	-
MS-T			2/8/2019	1	201902089145478269				-	-	-	-	-	-	-
MS-O			2/19/2019	2	201902190300031279				-	-	-	-	-	-	-
MS-T			4/10/2019	1	201904109146065158				-	-	-	-	-	-	-
MS-T			4/24/2019	1	201904249149584636				-	-	-	-	-	-	-
F3XN	MY	N	7/31/2019	289	201907319161296442	1/1/2019	6/30/2019		\$363,741	\$898,070	\$817,962	\$443,850	-	-	\$0
F1A		A	2/12/2019	10	201902129145505198				-	-	-	-	-	-	-
F1A		A	2/13/2019	11	201902139145509007				-	-	-	-	-	-	-
F1A		A	4/12/2019	9	201904129146105738				-	-	-	-	-	-	-
Totals										\$898,070	\$817,962				

O-Index (2017-2018)															
Cmte. ID: C00041160 Cmte. Name: MICHIGAN REPUBLICAN PARTY															
Treasurer Name: MEYERS, CARL MR. Address: 520 SEYMOUR AVENUE, LANSING, MI 48933															
Cmte. Type: Y (QUALIFIED PARTY) 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			3/10/2017	1	201703109050764175				-	-	-	-	-	-	-
MS-T			3/17/2017	1	201703179050880258				-	-	-	-	-	-	-
MS-T			4/26/2018	1	201804269111731902				-	-	-	-	-	-	-
MS-T			8/2/2018	1	201808029119342082				-	-	-	-	-	-	-
MS-T			10/4/2018	1	201810049124284841				-	-	-	-	-	-	-
RQ1		A	10/2/2018	2	201810020300021075			10/2/2018	-	-	-	-	-	-	-
RQ2	M6	A	11/7/2017	2	201711070300094629	5/1/2017	5/31/2017	11/7/2017	-	-	-	-	-	-	-
RQ2	M7	A	11/8/2017	2	201711080300094685	6/1/2017	6/30/2017	11/8/2017	-	-	-	-	-	-	-
RQ2	YE	N	4/19/2018	2	201804190300003787	12/1/2017	12/31/2017	4/19/2018	-	-	-	-	-	-	-
RQ2	M4	N	7/30/2018	2	201807300300014756	3/1/2018	3/31/2018	7/30/2018	-	-	-	-	-	-	-
RQ2	M9	N	2/6/2019	2	201902060300030287	8/1/2018	8/31/2018	2/6/2019	-	-	-	-	-	-	-
RQ2	M10	N	2/6/2019	4	201902060300030289	9/1/2018	9/30/2018	2/6/2019	-	-	-	-	-	-	-
RQ2	12G	N	2/6/2019	3	201902060300030301	10/1/2018	10/17/2018	2/6/2019	-	-	-	-	-	-	-
RQ2	30G	N	4/7/2019	3	201904070300036684	10/18/2018	11/26/2018	4/7/2019	-	-	-	-	-	-	-
RQ2	YE	N	4/7/2019	2	201904070300036694	11/27/2018	12/31/2018	4/7/2019	-	-	-	-	-	-	-
F3XN	M2	N	2/20/2017	91	201702209049729224	1/1/2017	1/31/2017		\$819,779	\$177,028	\$229,838	\$766,969	\$0	-	\$0
F3XN	M3	N	3/20/2017	84	201703209050888161	2/1/2017	2/28/2017		\$766,969	\$92,181	\$307,964	\$551,186	-	-	\$0
F3XA	M3	A	9/13/2017	83	201709139074684318	2/1/2017	2/28/2017		\$766,969	\$92,181	\$307,964	\$551,186	-	-	\$0
F3XN	M4	N	4/20/2017	60	201704209052348645	3/1/2017	3/31/2017		\$551,186	\$71,824	\$145,998	\$477,012	-	-	\$0
F3XA	M4	A	9/13/2017	59	201709139074684402	3/1/2017	3/31/2017		\$551,186	\$71,824	\$145,998	\$477,012	-	-	\$0
F3XN	M5	N	5/19/2017	57	201705199054030624	4/1/2017	4/30/2017		\$477,012	\$133,680	\$166,347	\$444,345	-	-	\$0
F3XA	M5	A	9/13/2017	56	201709139074684492	4/1/2017	4/30/2017		\$477,012	\$133,680	\$166,347	\$444,345	-	-	\$0
F3XN	M6	N	6/20/2017	100	201706209063542242	5/1/2017	5/31/2017		\$444,345	\$273,785	\$227,534	\$490,597	-	-	\$0
F3XA	M6	A	9/13/2017	99	201709139074686030	5/1/2017	5/31/2017		\$444,345	\$273,785	\$227,534	\$490,597	-	-	\$0
F3XA	M6	A	11/9/2017	99	201711099086618577	5/1/2017	5/31/2017		\$444,345	\$273,785	\$227,534	\$490,597	-	-	\$0
F3XN	M7	N	7/20/2017	90	201707209066848796	6/1/2017	6/30/2017		\$490,597	\$195,873	\$186,496	\$499,974	-	-	\$0
F3XA	M7	A	9/13/2017	90	201709139074686368	6/1/2017	6/30/2017		\$490,597	\$195,873	\$186,496	\$499,974	-	-	\$0
F3XA	M7	A	11/9/2017	90	201711099086618691	6/1/2017	6/30/2017		\$490,597	\$195,873	\$186,496	\$499,974	-	-	\$0
F3XN	M8	N	8/18/2017	84	201708189070455641	7/1/2017	7/31/2017		\$499,974	\$171,245	\$159,838	\$511,381	-	-	\$0

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F3XA	M8	A	9/13/2017	84	201709139074687099	7/1/2017	7/31/2017		\$499,974	\$171,245	\$159,838	\$511,381	-	-	\$0
F3XN	M9	N	9/20/2017	92	201709209074791966	8/1/2017	8/31/2017		\$511,381	\$205,971	\$188,730	\$528,623	-	-	\$0
F3XN	M10	N	10/20/2017	81	201710209075854890	9/1/2017	9/30/2017		\$528,623	\$237,569	\$167,988	\$598,203	-	-	\$0
F3XN	M11	N	11/20/2017	120	201711209086780990	10/1/2017	10/31/2017		\$598,203	\$491,623	\$232,743	\$857,083	-	-	\$0
F3XN	M12	N	12/20/2017	104	201712209089290440	11/1/2017	11/30/2017		\$857,083	\$250,410	\$202,152	\$905,342	-	-	\$0
F3XN	YE	N	1/19/2018	101	201801199090457675	12/1/2017	12/31/2017		\$905,342	\$470,784	\$180,743	\$1,195,382	-	-	\$0
F3XN	M2	N	2/20/2018	84	201802209094600199	1/1/2018	1/31/2018		\$1,195,382	\$226,576	\$210,648	\$1,211,311	-	-	\$0
F3XN	M3	N	3/20/2018	124	201803209096616311	2/1/2018	2/28/2018		\$1,211,311	\$357,030	\$259,663	\$1,308,678	-	-	\$0
F3XN	M4	N	4/20/2018	120	201804209110406921	3/1/2018	3/31/2018		\$1,308,678	\$350,297	\$227,333	\$1,431,642	-	-	\$0
F3XN	M5	N	5/18/2018	124	201805189112104170	4/1/2018	4/30/2018		\$1,431,642	\$268,264	\$254,191	\$1,445,715	-	-	\$0
F3XN	M6	N	6/20/2018	174	201806209113910564	5/1/2018	5/31/2018		\$1,445,715	\$462,231	\$320,556	\$1,587,390	-	-	\$0
F3XN	M7	N	7/19/2018	137	201807199115775319	6/1/2018	6/30/2018		\$1,587,390	\$653,208	\$249,483	\$1,991,115	-	-	\$0
F3XN	M8	N	8/20/2018	143	201808209119987972	7/1/2018	7/31/2018		\$1,991,115	\$384,028	\$329,304	\$2,045,839	-	-	\$0
F3XN	M9	N	9/20/2018	148	201809209122089284	8/1/2018	8/31/2018		\$2,045,839	\$451,789	\$309,418	\$2,188,210	-	-	\$0
F3XN	M10	N	10/19/2018	200	201810199125644604	9/1/2018	9/30/2018		\$2,188,210	\$1,083,706	\$1,098,634	\$2,173,282	-	-	\$0
F3XA	M10	A	2/11/2019	206	201902119145497043	9/1/2018	9/30/2018		\$2,188,210	\$1,083,706	\$1,098,634	\$2,173,282	-	-	\$0
F3XN	12G	N	10/25/2018	176	201810259130884508	10/1/2018	10/17/2018		\$2,173,282	\$1,635,235	\$1,272,809	\$2,535,708	-	-	\$0
F3XA	12G	A	2/21/2019	185	201902219145578059	10/1/2018	10/17/2018		\$2,173,282	\$1,635,235	\$1,272,809	\$2,535,708	-	-	\$0
F3XN	30G	N	12/6/2018	253	201812069134578215	10/18/2018	11/26/2018		\$2,535,708	\$2,327,695	\$4,405,415	\$457,987	-	-	\$0
F3XA	30G	A	4/24/2019	254	201904249149587000	10/18/2018	11/26/2018		\$2,535,708	\$2,327,695	\$4,405,415	\$457,987	-	-	\$0
F3XN	YE	N	1/31/2019	149	201901319144293071	11/27/2018	12/31/2018		\$457,987	\$314,174	\$408,420	\$363,741	-	-	\$0
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F24N	48		9/20/2018	1	201809209122026373				-	-	-	-	-	-	-
F1A		A	8/27/2018	9	201808279121530820				-	-	-	-	-	-	-
F24N	48		10/18/2018	2	201810189125614870				-	-	-	-	-	-	-
F24N	48		10/19/2018	1	201810199125662930				-	-	-	-	-	-	-
F24A	48		10/19/2018	2	201810199125666209				-	-	-	-	-	-	-
F24N	48		10/16/2018	1	201810169125556205				-	-	-	-	-	-	-
F24N	48		10/15/2018	1	201810159125006628				-	-	-	-	-	-	-
F24N	48		10/30/2018	1	201810309133557704				-	-	-	-	-	-	-
F24A	48		10/30/2018	1	201810309133557933				-	-	-	-	-	-	-
F24N	48		11/1/2018	2	201811019133572527				-	-	-	-	-	-	-
F24N	48		10/29/2018	4	201810299133552096				-	-	-	-	-	-	-
F24N	48		10/31/2018	1	201810319133568542				-	-	-	-	-	-	-
F1A		A	3/15/2018	5	201803159096557985				-	-	-	-	-	-	-
F1A		A	6/13/2018	8	201806139113677737				-	-	-	-	-	-	-
F1A		A	5/29/2018	6	201805299113620716				-	-	-	-	-	-	-
F1A		A	8/3/2018	8	201808039119351535				-	-	-	-	-	-	-
F24N	48		10/5/2018	2	201810059124319801				-	-	-	-	-	-	-
F24A	48		10/5/2018	2	201810059124377473				-	-	-	-	-	-	-
F1A		A	10/4/2018	9	201810049124284794				-	-	-	-	-	-	-
F24N	48		10/4/2018	6	201810049124315950				-	-	-	-	-	-	-
F24N	48		10/8/2018	1	201810089124399613				-	-	-	-	-	-	-
F24N	48		10/1/2018	5	201810019124271727				-	-	-	-	-	-	-
F1A		A	9/28/2018	14	201809289124252343				-	-	-	-	-	-	-
F24N	48		9/28/2018	4	201809289124255202				-	-	-	-	-	-	-
F24N	48		9/24/2018	1	201809249124237246				-	-	-	-	-	-	-
F24N	48		10/25/2018	1	201810259131026536				-	-	-	-	-	-	-
F24N	48		10/26/2018	3	201810269133543616				-	-	-	-	-	-	-
F24A	48		10/26/2018	3	201810269133544752				-	-	-	-	-	-	-

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F24A	48		10/24/2018	1	201810249130831936					-	-	-	-	-	-	-
F24N	48		10/24/2018	1	201810249130831966					-	-	-	-	-	-	-
F24N	48		10/22/2018	1	201810229130595444					-	-	-	-	-	-	-
Totals											\$11,286,218	\$11,742,256				

O-Index (2015-2016)															
Cmte. ID: C00041160 Cmte. Name: MICHIGAN REPUBLICAN PARTY															
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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-M			1/29/2015	1	15950142511				-	-	-	-	-	-	-
MS-T			1/29/2015	1	15970132549				-	-	-	-	-	-	-
MS-O			3/10/2015	2	15330078250				-	-	-	-	-	-	-
MS-T			3/23/2015	1	15951094870				-	-	-	-	-	-	-
MS-T			3/26/2015	1	15951097768				-	-	-	-	-	-	-
MS-T			4/23/2015	1	15970677401				-	-	-	-	-	-	-
MS-M			1/29/2016	1	201601299004729905				-	-	-	-	-	-	-
MS-O			2/2/2016	2	201602030300010348				-	-	-	-	-	-	-
RQ2	M9	N	11/9/2016	3	201611090300068039	8/1/2016	8/31/2016	11/9/2016	-	-	-	-	-	-	-
RQ2	M10	N	12/29/2016	2	201612290300072874	9/1/2016	9/30/2016	12/29/2016	-	-	-	-	-	-	-
RQ2	30G	N	3/6/2017	2	201703060300081977	10/20/2016	11/28/2016	3/6/2017	-	-	-	-	-	-	-
RQ2	YE	N	3/5/2017	2	201703050300081953	11/29/2016	12/31/2016	3/5/2017	-	-	-	-	-	-	-
F3XN	MY	N	7/30/2015	505	201507309000463424	1/1/2015	6/30/2015		\$434,189	\$1,167,880	\$1,301,631	\$300,438	\$11,956	-	\$11,956
F3XN	YE	N	1/29/2016	579	201601299004729121	7/1/2015	12/31/2015		\$300,438	\$1,578,285	\$1,385,850	\$492,873	\$0	-	\$0
F3XN	M2	N	2/18/2016	110	201602189008488197	1/1/2016	1/31/2016		\$492,873	\$262,871	\$263,760	\$491,983	-	-	\$0
F3XN	M3	N	3/17/2016	114	201603179009776694	2/1/2016	2/29/2016		\$491,983	\$306,688	\$281,019	\$517,653	\$17,700	-	\$17,700
F3XN	M4	N	4/19/2016	145	201604199012599978	3/1/2016	3/31/2016		\$517,653	\$294,986	\$276,181	\$536,457	\$0	-	\$0
F3XN	M5	N	5/20/2016	129	201605209015558156	4/1/2016	4/30/2016		\$536,457	\$294,796	\$276,448	\$554,805	-	-	\$0
F3XA	M5	A	5/20/2016	132	201605209015998701	4/1/2016	4/30/2016		\$536,457	\$294,796	\$276,448	\$554,805	-	-	\$0
F3XN	M6	N	6/20/2016	188	201606209018479590	5/1/2016	5/31/2016		\$554,805	\$411,437	\$467,121	\$499,121	\$18,500	-	\$18,500
F3XN	M7	N	7/20/2016	177	201607209021669809	6/1/2016	6/30/2016		\$499,121	\$528,521	\$310,063	\$717,579	\$0	-	\$0
F3XN	M8	N	8/19/2016	178	201608199022563480	7/1/2016	7/31/2016		\$717,579	\$339,979	\$347,695	\$709,863	\$1,554	-	\$1,554
F3XN	M9	N	9/19/2016	134	201609199030962244	8/1/2016	8/31/2016		\$709,863	\$248,325	\$328,567	\$629,621	\$50,000	-	\$50,000
F3XA	M9	A	11/10/2016	133	201611109037139847	8/1/2016	8/31/2016		\$709,863	\$248,325	\$328,567	\$629,621	\$50,000	-	\$50,000
F3XN	M10	N	10/18/2016	199	201610189033022207	9/1/2016	9/30/2016		\$629,621	\$1,040,939	\$762,587	\$907,973	\$0	-	\$0
F3XA	M10	A	1/9/2017	199	201701099041203247	9/1/2016	9/30/2016		\$629,621	\$1,040,939	\$762,587	\$907,973	\$0	-	\$0
F3XN	12G	N	10/27/2016	153	201610279034663616	10/1/2016	10/19/2016		\$907,973	\$704,206	\$653,739	\$958,440	-	-	\$0
F3XN	30G	N	12/7/2016	289	201612079037730809	10/20/2016	11/28/2016		\$958,440	\$900,935	\$1,042,385	\$816,990	-	-	\$0
F3XA	30G	A	3/16/2017	289	201703169050872292	10/20/2016	11/28/2016		\$958,440	\$900,935	\$1,042,385	\$816,990	-	-	\$0
F3XN	YE	N	1/31/2017	133	201701319042134930	11/29/2016	12/31/2016		\$816,990	\$826,786	\$823,997	\$819,779	\$10,562	-	\$10,562
F1A		A	6/14/2016	5	201606149017580162				-	-	-	-	-	-	-
F1A		A	4/16/2015	5	15970364921				-	-	-	-	-	-	-
F1A		A	4/16/2015	4	15970365382				-	-	-	-	-	-	-
F24N	48		10/12/2016	1	201610129032273826				-	-	-	-	-	-	-
Totals										\$8,906,641	\$8,521,051				

Michigan Republican Party (C00041160)
 2018 30-Day Post-General Report

24-Hour Report Not Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount (Image 201812069134578346)	Candidate Supported	Election
Medium Buying, LLC	10/25/18	\$499,950.00 <i>24-Hour Report Required</i>	John James	2018 General
	Total	\$499,950.00		