19L-30

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 6, 2019

ANALYST: Jack Baisden

I. COMMITTEE: For Our Future
C00620971
Gail Stoltz, Treasurer (5/24/19-Present)
Sky Gallegos, Treasurer (7/7/17-5/23/19)
1411 K Street NW, Suite 900
Washington, DC 20005

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)

For Our Future ("the Committee") amended its 2018 30 Day Post-General Report to disclose additional receipts totaling $133,489.00[1] which were not disclosed on the original report (Attachment 2).

On December 6, 2018, the Committee filed its original 2018 30 Day Post-General Report covering the period from October 18, 2018 through November 26, 2018. The report disclosed $261,803.50 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) of the Detailed Summary Page (Image 201812069135174029, Attachment 2).

On December 21, 2018, the Committee filed an Amended 2018 30 Day Post-General Report. The report disclosed $395,292.50 in receipts on Line 11(a)(i) of the Detailed Summary Page, an increase of $133,489.00 from the original report (Image 201812219143660125).

[1] Per the reporting requirement for in-kind contributions received, the Committee disclosed additional receipts totaling $133,489.00 on Schedule A and additional disbursements to offset the in-kind receipts totaling $133,489.00 on Schedule B, resulting in a total increase in activity of $133,489.00.

On June 9, 2019, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2018 30 Day Post-General Report, received December 21, 2018. Among other items, the RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2018 30 Day Post-General Report (Image 201906090300041510).

On July 15, 2019, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the Amended 2018 30 Day Post-General Report, received December 21, 2018. The Committee stated, in part:

> "Shortly after filing its Original Post-General Report on December 6, 2018, the Committee determined that in-kind contributions in the form of staff salaries and benefits were inadvertently omitted from the filing. The $133,489 increase in receipts from the Original Post-General Report to the Amended Post-General Report was due to four in-kind contributions from AFSCME in the following amounts: $70,745, $9,522, $21,201, and $32,021. The Committee periodically receives letters providing notifications from various outside organizations of in-kind contributions in the form of staff salaries, public communications, or other things of value and includes those contributions on its reports to the Commission, including, for example, similar contributions from AFSCME disclosed by the Committee on its 2018 Pre-General and October Quarterly Reports. However, in this instance, an internal miscommunication regarding the notification received from AFSCME prior to the filing deadline resulted in inadvertent omission of these in-kind contributions from the original Post-General Report. Once the Committee discovered the omission, the Committee amended its Post-General Report to disclose the omitted in-kind contributions, resulting in an increase in receipts of $133,489. The Committee has reviewed its internal communication procedures in an effort to prevent similar omissions in the future" (Image 201907159150989717).

On July 16, 2019, the Committee filed an Amended 2018 30 Day Post-General Report. The report disclosed no changes to Line 11(a)(i) of the Detailed Summary Page (Image 201907169151368350, Attachment 2).

On August 7, 2019, the RAD Analyst called Brian Farnkoff, an attorney for the Committee, and explained the Committee could be referred to another office for potential further action for the substantial increase in activity disclosed on their Amended 2018 30 Day Post-General Report. The RAD Analyst advised the committee they could provide additional clarification if they desired (Attachment 3).

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

O-Index (2019-2020)
Cmte. ID: C00620971 Cmte. Name: FOR OUR FUTURE
Treasurer Name: STOLTZ, GAIL Address: 1411 K STREET NW, SUITE 900, WASHINGTON, DC 20005
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	Lttr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			5/13/2019	4	201905139149694572				-	-	-	-	-	-	-
MS-T			7/15/2019	3	201907159150989717				-	-	-	-	-	-	-
F3XN	MY	N	7/31/2019	54	201907319161327045	1/1/2019	6/30/2019		$791,386	$1,516,914	$943,880	$1,364,420	$2,500	-	$2,500
F1A		A	5/24/2019	5	201905249149835044				-	-	-	-	-	-	-
Totals										**$1,516,914**	**$943,880**				

O-Index (2017-2018)
Cmte. ID: C00620971 Cmte. Name: FOR OUR FUTURE
Treasurer Name: STOLTZ, GAIL Address: 1411 K STREET NW, SUITE 900, WASHINGTON, DC 20005
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	Lttr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			8/9/2017	2	201708099070312709				-	-	-	-	-	-	-
MS-T			8/9/2017	4	201708099070312711				-	-	-	-	-	-	-
MS-T			8/9/2017	3	201708099070312715				-	-	-	-	-	-	-
RQ2	YE	N	3/4/2018	2	201803040300000461	7/1/2017	12/31/2017	3/4/2018	-	-	-	-	-	-	-
RQ2	12G	A	4/7/2019	3	201904070300036689	10/1/2018	10/17/2018	4/7/2019	-	-	-	-	-	-	-
RQ2	30G	A	6/9/2019	5	201906090300041510	10/18/2018	11/26/2018	6/9/2019	-	-	-	-	-	-	-
F3XN	MY	N	7/31/2017	92	201707319069912058	1/1/2017	6/30/2017		$610,668	$3,000,171	$1,314,972	$2,295,867	$14,795	-	$14,795
F3XN	YE	N	1/31/2018	134	201801319091194970	7/1/2017	12/31/2017		$2,295,867	$3,315,390	$2,475,488	$3,135,769	$464,902	-	$464,902
F3XA	YE	A	4/9/2018	134	201804099104799680	7/1/2017	12/31/2017		$2,295,867	$3,315,390	$2,475,488	$3,135,769	$464,902	-	$464,902
F3XN	30S	N	4/12/2018	88	201804129108006670	1/1/2018	4/2/2018		$3,135,769	$2,833,380	$1,709,434	$4,259,715	$0	-	$0
F3XN	Q2	N	7/15/2018	107	201807159115577547	4/3/2018	6/30/2018		$4,259,715	$667,235	$716,203	$4,210,747	$308,310	-	$308,310
F3XA	Q2	A	8/16/2018	107	201808169119667340	4/3/2018	6/30/2018		$4,259,715	$667,235	$716,203	$4,210,747	$304,280	-	$304,280
F3XN	12P	N	8/16/2018	50	201808169119667785	7/1/2018	8/8/2018		$4,210,747	$688,869	$645,211	$4,254,405	$1,030,323	-	$1,030,323
F3XN	30S	N	9/6/2018	27	201809069121596131	8/9/2018	8/27/2018		$4,254,405	$1,723,656	$284,124	$5,693,937	$1,056,395	-	$1,056,395
F3XN	Q3	N	10/15/2018	60	201810159125202689	8/28/2018	9/30/2018		$5,693,937	$6,695,164	$4,479,527	$7,909,574	$130,342	-	$130,342
F3XN	12G	N	10/25/2018	69	201810259133478795	10/1/2018	10/17/2018		$7,909,574	$3,436,448	$1,384,567	$9,961,454	$619,168	-	$619,168
F3XA	12G	A	12/21/2018	70	201812219143659962	10/1/2018	10/17/2018		$7,909,574	$3,436,448	$1,384,567	$9,961,454	$588,051	-	$583,258
F3XN	30G	N	12/6/2018	207	201812069135174027	10/18/2018	11/26/2018		$9,961,454	$508,676	$9,033,646	$1,436,485	$253,598	-	$253,598
F3XA	30G	A	12/21/2018	209	201812219143660123	10/18/2018	11/26/2018		$9,961,454	$642,165	$9,167,135	$1,436,485	$254,066	-	$249,273
F3XA	30G	A	7/16/2019	209	201907169151368348	10/18/2018	11/26/2018		$9,961,454	$642,165	$9,167,135	$1,436,485	$181,741	-	$181,741
F3XN	YE	N	1/31/2019	55	201901319145318378	11/27/2018	12/31/2018		$1,436,485	$58,865	$703,964	$791,386	$0	-	$0
F1A		A	7/7/2017	5	201707079066564583				-	-	-	-	-	-	-
F24N	48		6/18/2018	9	201806189113741345				-	-	-	-	-	-	-
F24N	48		7/2/2018	2	201807029115210780				-	-	-	-	-	-	-
F24N	48		6/25/2018	2	201806259115168601				-	-	-	-	-	-	-
F24N	24		7/27/2018	5	201807279119327613				-	-	-	-	-	-	-
F24N	48		9/18/2018	2	201809189121962830				-	-	-	-	-	-	-
F24N	48		8/31/2018	1	201808319121548535				-	-	-	-	-	-	-
F24N	48		9/10/2018	1	201809109121662371				-	-	-	-	-	-	-
F24N	48		9/14/2018	4	201809149121718038				-	-	-	-	-	-	-
F24N	24		8/22/2018	2	201808229121510164				-	-	-	-	-	-	-
F24N	48		8/24/2018	2	201808249121517757				-	-	-	-	-	-	-
F24N	48		10/17/2018	3	201810179125602257				-	-	-	-	-	-	-
F24N	48		10/16/2018	4	201810169125563105				-	-	-	-	-	-	-
F24N	24		10/30/2018	4	201810309133563638				-	-	-	-	-	-	-

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F24N	24		10/27/2018	4	201810279133548649				-	-	-	-	-	-	-
F24N	24		11/1/2018	2	201811019133576101				-	-	-	-	-	-	-
F24N	24		11/2/2018	1	201811029133579394				-	-	-	-	-	-	-
F24N	24		11/3/2018	12	201811039133586146				-	-	-	-	-	-	-
F24N	24		11/5/2018	1	201811059133592607				-	-	-	-	-	-	-
F24N	48		10/25/2018	1	201810259133480571				-	-	-	-	-	-	-
F24N	24		10/26/2018	21	201810269133547416				-	-	-	-	-	-	-
F24N	24		3/11/2018	1	201803119096531536				-	-	-	-	-	-	-
F24N	48		7/11/2018	1	201807119115332906				-	-	-	-	-	-	-
F24N	24		8/2/2018	2	201808029119346207				-	-	-	-	-	-	-
F24N	48		8/6/2018	3	201808069119372908				-	-	-	-	-	-	-
F24N	24		8/1/2018	1	201808019119338438				-	-	-	-	-	-	-
F24N	24		8/10/2018	1	201808109119391769				-	-	-	-	-	-	-
F24N	48		10/13/2018	18	201810139124738521				-	-	-	-	-	-	-
F24N	48		10/11/2018	1	201810119124494664				-	-	-	-	-	-	-
F24N	48		10/3/2018	16	201810039124284185				-	-	-	-	-	-	-
F24N	48		9/26/2018	3	201809269124248167				-	-	-	-	-	-	-
F24N	48		9/27/2018	3	201809279124251830				-	-	-	-	-	-	-
F24N	48		9/29/2018	1	201809299124258432				-	-	-	-	-	-	-
F24N	24		10/23/2018	2	201810239130818552				-	-	-	-	-	-	-
F24N	24		10/24/2018	7	201810249130855963				-	-	-	-	-	-	-
F24N	48		10/19/2018	1	201810199125785867				-	-	-	-	-	-	-
F24N	24		10/19/2018	19	201810199125786061				-	-	-	-	-	-	-
F24N	48		10/18/2018	1	201810189125630848				-	-	-	-	-	-	-
Totals										**$23,061,348**	**$22,880,629**				

O-Index (2015-2016)

Cmte. ID: C00620971 Cmte. Name: FOR OUR FUTURE

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RQ2	Q3	A	7/5/2017	8	201707050300087721	7/1/2016	9/30/2016	7/5/2017	-	-	-	-	-	-	-
RQ2	12G	A	7/5/2017	6	201707050300087729	10/1/2016	10/19/2016	7/5/2017	-	-	-	-	-	-	-
RQ2	30G	A	7/5/2017	6	201707050300087735	10/20/2016	11/28/2016	7/5/2017	-	-	-	-	-	-	-
F3XN	Q2	N	7/15/2016	8	201607159020558508	6/27/2016	6/30/2016		$0	$2,500,000	$25	$2,499,975	$11,146	-	$11,146
F3XN	Q3	N	10/15/2016	484	201610159032877793	7/1/2016	9/30/2016		$2,499,975	$30,046,312	$21,456,019	$11,090,268	$433,544	-	$433,544
F3XA	Q3	A	12/8/2016	486	201612089040557377	7/1/2016	9/30/2016		$2,499,975	$30,072,624	$21,486,193	$11,086,406	$421,928	-	$421,928
F3XA	Q3	A	1/27/2017	486	201701279041528404	7/1/2016	9/30/2016		$2,499,975	$30,072,624	$21,486,013	$11,086,586	$423,496	-	$423,496
F3XA	Q3	A	4/13/2017	486	201704139052092453	7/1/2016	9/30/2016		$2,499,975	$30,072,624	$21,486,013	$11,086,586	$486,356	-	$486,356
F3XA	Q3	A	8/9/2017	487	201708099070311334	7/1/2016	9/30/2016		$2,499,975	$30,072,624	$21,486,013	$11,086,586	$491,044	-	$491,044
F3XN	12G	N	10/27/2016	277	201610279036998363	10/1/2016	10/19/2016		$11,090,268	$1,771,519	$10,652,674	$2,209,113	$447,169	-	$447,169
F3XA	12G	A	12/8/2016	289	201612089040559375	10/1/2016	10/19/2016		$11,086,406	$1,771,519	$10,804,202	$2,053,723	$447,169	-	$447,169
F3XA	12G	A	1/27/2017	289	201701279041528917	10/1/2016	10/19/2016		$11,086,586	$1,771,519	$10,804,382	$2,053,723	$379,108	-	$379,108
F3XA	12G	A	4/13/2017	291	201704139052093146	10/1/2016	10/19/2016		$11,086,586	$1,694,911	$10,727,773	$2,053,723	$466,440	-	$385,620
F3XA	12G	A	8/9/2017	287	201708099070311822	10/1/2016	10/19/2016		$11,086,586	$1,694,911	$10,727,773	$2,053,723	$510,195	-	$510,195
F3XN	30G	N	12/9/2016	456	201612099040590834	10/20/2016	11/28/2016		$2,053,723	$14,301,635	$6,658,530	$9,696,827	$516,568	-	$516,568
F3XA	30G	A	1/27/2017	529	201701279041529251	10/20/2016	11/28/2016		$2,053,723	$14,316,973	$14,270,703	$2,099,993	$470,110	-	$470,110
F3XA	30G	A	4/13/2017	540	201704139052093871	10/20/2016	11/28/2016		$2,053,723	$14,450,604	$14,404,334	$2,099,993	$570,254	-	$393,739
F3XA	30G	A	8/9/2017	535	201708099070312109	10/20/2016	11/28/2016		$2,053,723	$14,450,604	$14,404,334	$2,099,993	$393,739	-	$393,739
F3XN	YE	N	1/31/2017	53	201701319042377478	11/29/2016	12/31/2016		$2,099,993	$229,429	$1,718,754	$610,668	$189,099	-	$189,099
F3XA	YE	A	4/13/2017	50	201704139052094413	11/29/2016	12/31/2016		$2,099,993	$229,429	$1,718,754	$610,668	$300,031	-	$112,728

F3XA	YE	A	8/9/2017	50	201708099070312644	11/29/2016	12/31/2016		$2,099,993	$229,429	$1,718,754	$610,668	$112,728	-	$112,728
F1A		A	7/6/2016	4	201607069020364495				-	-	-	-	-	-	-
F24N	48		7/6/2016	1	201607069020364999				-	-	-	-	-	-	-
F24N	48		6/29/2016	1	201606299020104052				-	-	-	-	-	-	-
F1N		N	6/29/2016	5	201606299020103744				-	-	-	-	-	-	-
F24N	48		7/20/2016	2	201607209021683275				-	-	-	-	-	-	-
F24N	48		8/30/2016	1	201608309023761019				-	-	-	-	-	-	-
F24N	48		8/31/2016	1	201608319023764310				-	-	-	-	-	-	-
F24N	48		9/4/2016	2	201609049023773076				-	-	-	-	-	-	-
F24N	48		9/7/2016	1	201609079030750966				-	-	-	-	-	-	-
F24N	48		9/2/2016	1	201609029023772442				-	-	-	-	-	-	-
F24N	48		9/15/2016	1	201609159030826862				-	-	-	-	-	-	-
F24N	48		9/14/2016	4	201609149030815462				-	-	-	-	-	-	-
F24N	48		8/24/2016	1	201608249023739532				-	-	-	-	-	-	-
F24N	48		10/14/2016	2	201610149032529090				-	-	-	-	-	-	-
F24N	48		10/16/2016	6	201610169032880500				-	-	-	-	-	-	-
F24N	24		11/7/2016	4	201611079037134541				-	-	-	-	-	-	-
F24N	24		10/29/2016	15	201610299037009024				-	-	-	-	-	-	-
F24N	24		10/27/2016	3	201610279036971685				-	-	-	-	-	-	-
F24N	24		10/28/2016	6	201610289037006458				-	-	-	-	-	-	-
F24N	24		10/30/2016	1	201610309037010649				-	-	-	-	-	-	-
F1A		A	10/30/2016	5	201610309037010050				-	-	-	-	-	-	-
F24N	24		10/31/2016	1	201610319037014838				-	-	-	-	-	-	-
F24N	24		11/6/2016	8	201611069037127448				-	-	-	-	-	-	-
F24N	24		11/1/2016	26	201611019037018188				-	-	-	-	-	-	-
F24N	24		11/4/2016	7	201611049037123252				-	-	-	-	-	-	-
F24N	24		11/5/2016	6	201611059037125598				-	-	-	-	-	-	-
F24N	24		11/2/2016	7	201611029037084317				-	-	-	-	-	-	-
F24N	24		11/3/2016	7	201611039037112657				-	-	-	-	-	-	-
F24N	24		10/25/2016	30	201610259034581093				-	-	-	-	-	-	-
F24N	24		10/26/2016	1	201610269034636190				-	-	-	-	-	-	-
F1A		A	12/13/2016	5	201612139040608153				-	-	-	-	-	-	-
F24N	48		7/13/2016	1	201607139020432315				-	-	-	-	-	-	-
F24N	48		8/17/2016	1	201608179022505017				-	-	-	-	-	-	-
F24N	48		8/3/2016	1	201608039022174946				-	-	-	-	-	-	-
F24N	48		7/27/2016	1	201607279021957202				-	-	-	-	-	-	-
F24N	48		8/10/2016	2	201608109022191297				-	-	-	-	-	-	-
F24N	48		10/12/2016	22	201610129032397680				-	-	-	-	-	-	-
F24N	48		10/7/2016	2	201610079032215613				-	-	-	-	-	-	-
F24N	48		10/5/2016	16	201610059032172947				-	-	-	-	-	-	-
F24N	48		9/28/2016	14	201609289032144129				-	-	-	-	-	-	-
F24N	48		10/1/2016	4	201610019032150726				-	-	-	-	-	-	-
F24N	48		9/21/2016	8	201609219032080650				-	-	-	-	-	-	-
F24N	48		9/23/2016	1	201609239032102411				-	-	-	-	-	-	-
F24N	24		10/24/2016	2	201610249034544796				-	-	-	-	-	-	-
F24N	24		10/21/2016	6	201610219034524710				-	-	-	-	-	-	-
F24N	24		10/22/2016	5	201610229034529219				-	-	-	-	-	-	-
F24N	48		10/19/2016	23	201610199033076246				-	-	-	-	-	-	-
F24N	48		10/18/2016	1	201610189033040401				-	-	-	-	-	-	-
Totals										**$48,947,569**	**$48,336,901**				

Attachment 1

For Our Future (C00620971)
2018 30 Day Post-General Report/Amended 2018 30 Day Post-General Report

Overview of Additional Receipts

Report Line	Original 2018 30 Day Post-General Report (Image 201812069135174029)	Amended 2018 30 Day Post-General Report, received 7/16/2019 (Image 201907169151368350)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	$261,803.50	$395,292.50	$133,489.00
		Total:	$133,489.00