

REPORTS ANALYSIS DIVISION REFERRAL
 TO
 ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 14, 2020

ANALYST: Sean Krieger

- I. COMMITTEE: Americans for Prosperity Action, Inc.
 (AFP Action)
 C00687103
 Alex Varban, Treasurer (5/7/19-Present)
 Thomas F. Maxwell III (1/25/19-5/6/19)
 Gary Castellaw (9/10/18-1/24/19)
 2200 Wilson Boulevard
 #102-177
 Arlington, VA 2200
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(8)
 52 U.S.C. § 30104(g)(2)
 11 CFR § 104.3(d)
 11 CFR § 104.4(b)(2)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)

Americans for Prosperity Action, Inc. (AFP Action), (“the Committee”), failed to timely file two (2) 48-Hour Reports to support three (3) independent expenditures totaling \$201,193.26 disclosed on the Amended 2018 October Quarterly Report, received July 31, 2019, made up to and including the 20th day before the 2018 General Election (Attachment 2). Additionally, the Committee failed to timely file three (3) 48-Hour Reports to support seventeen (17) independent expenditures totaling \$93,770.49 disclosed on the Amended 2018 12-Day Pre-General Report, received July 31, 2019, made up to and including the 20th day before the 2018 General Election (Attachment 3).

2018 October Quarterly Report

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Americans for Prosperity Action, Inc. (AFP Action)
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On October 15, 2018, the Committee filed the 2018 October Quarterly Report covering the period from July 1, 2018 through September 30, 2018, which included a Schedule E (Itemized Independent Expenditures) disclosing thirty (30) independent expenditures totaling \$686,313.87 made in support of or opposition to ten (10) federal candidates for the 2018 General Election (Images 201810159124880766-80).

On December 6, 2018, the Committee filed two (2) 48-Hour Reports to support three (3) independent expenditures totaling \$201,193.26 disseminated on September 20, 2018 and September 30, 2018 (Images 201812069134383489 and 201812069134383320).

On March 21, 2019, the Committee filed an Amended 2018 October Quarterly Report, which included a Schedule E disclosing forty-one (41) independent expenditures totaling \$935,102.80 made in support of or opposition to thirteen (13) federal candidates the 2018 General Election (Images 201903219145919444-64).

On July 1, 2019, the Committee filed an Amended 2018 October Quarterly Report, which included a Schedule E disclosing forty-one (41) independent expenditures totaling \$933,670.80 made in support of or opposition to thirteen (13) federal candidates the 2018 General Election (Images 201907019150437075-95).

On July 31, 2019, the Committee filed an Amended 2018 October Quarterly Report, which included a Schedule E disclosing forty-five (45) independent expenditures totaling \$947,221.31 made in support of or opposition to fourteen (14) federal candidates. Among other items, the Committee failed to timely file two (2) 48-Hour Reports to support three (3) independent expenditures totaling \$201,193.26 for the 2018 General Election (Images 201907319161280639-61, Attachment 2).

On August 22, 2019, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2018 October Quarterly Report received July 31, 2019. Among other items, the RAFI noted that the Committee may have failed to timely file one or more 48-Hour Reports regarding independent expenditures (Image 201908220300046878).

On September 26, 2019, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RAFI referencing the Amended 2018 October Quarterly Report, received July 31, 2019. The Committee stated, in part:

“I am writing in response to your August 22, 2019 Request for Additional Information ("RAFI") regarding Americans For Prosperity Action's ("AFP Action") Amended October Quarterly Report Form 3x filing. As you noted in the RAFI AFP Action late-reported several 24/48-hour Schedule E transactions. AFP Action became aware of these late-filed transactions in the Fall of 2018 and we have implemented several improvements to our record keeping and reporting processes which has lead to a more robust compliance system to better prevent future late filings. We worked with our accountants and reviewed our processes to ensure all relevant invoices are promptly received from vendors and we have expedited the reporting of these expenses through automated tracking software. Additionally, we have

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spoken with our vendors and stressed the need for timely, accurate reporting of independent-expenditure related expenses” (Image 201909269163573173).

2018 12-Day Pre-General Report

On October 25, 2018, the Committee filed the 2018 12-Day Pre-General Report covering the period from October 1, 2018 to October 17, 2018, which included a Schedule E disclosing sixty-five (65) independent expenditures totaling \$3,905,270.23 in support of or opposition to sixteen (16) federal candidates for the 2018 General Election (Images 201810259133306051-83).

On December 5, 2018, the Committee filed four (4) 48-Hour Reports to support ten (10) independent expenditures totaling \$12,978.21, disseminated on October 3, 2018 and October 10, 2018 (Images 201812059134163170, 201812059134163155-6, 201812059134161568-9 and 201812059134164807).

On December 6, 2018, the Committee filed three (3) 48-Hour Reports to support six (6) independent expenditures totaling \$59,218.16, disseminated on October 8, 2018, October 10, 2018, and October 16, 2018 (Images 201812069134382584, 201812069134383193 and 201812069134382989).

On July 1, 2019, the Committee filed one (1) 48-Hour Report to support one (1) independent expenditure totaling \$21,574.12, disseminated on October 10, 2019 (Image 201907019150437194).

On July 1, 2019, the Committee filed an Amended 2018 12-Day Pre-General Report, which included a Schedule E containing ninety-five (95) independent expenditures totaling \$4,029,027.38 made in support of or opposition to sixteen (16) federal candidates for the 2018 General Election (Images 201907019150437142-89).

On July 31, 2019, the Committee filed an Amended 2018 12-Day Pre-General Report, which included a Schedule E containing ninety-seven (97) independent expenditures totaling \$4,018,832.95 made in support of or opposition to sixteen (16) federal candidates. Among other items, the Committee failed to timely file three (3) 48-Hour Reports to support seventeen (17) independent expenditures totaling \$93,770.49 for the 2018 General Election (Images 201907319161280743-91, Attachment 3).

On August 22, 2019, an RFAI was sent to the Committee referencing the 2018 12-Day Pre-General Report, received July 31, 2019. The RFAI noted that the Committee may have failed to timely file one or more 48-Hour Reports regarding independent expenditures (Image 201908220300046881).

On September 4, 2019, the Reports Analysis Division (RAD) Analyst spoke with Britton Giroux, a Representative of the Committee. Mr. Giroux had questions about the RFAI sent on the 2018 12-Day Pre-General Report. The Analyst informed Mr. Giroux that the RFAI was seeking additional information in regards to the 24- and 48-Hour Reports that were submitted late. The Analyst informed Mr. Giroux that the Committee could file

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an FEC Form 99 with clarifying information, or amend any 24- and 48-Hour Reports if any of the information on the current reports was incorrect. The Analyst advised that any filing on the public record will be taken into consideration when considering any potential enforcement action. Mr. Giroux explained he would talk to Committee's legal representatives to decide next steps, and I encouraged him to call back with any further questions or concerns (Attachment 5).

On September 26, 2019, the Committee filed an FEC Form 99, which stated, in part:

“I am writing in response to your August 22, 2019 Request for Additional Information ("RFAI") regarding Americans For Prosperity Action's ("AFP Action") Amended 12 Day Pre-General Form 3x filing. As you noted in the RFAI AFP Action late-reported several 24/48-hour Schedule E transactions. AFP Action became aware of these late-filed transactions in the Fall of 2018 and we have implemented several improvements to our record keeping and reporting processes which has lead to a more robust compliance system to better prevent future late filings. We worked with our accountants and reviewed our processes to ensure all relevant invoices are promptly received from vendors and we have expedited the reporting of these expenses through automated tracking software. Additionally, we have spoken with our vendors and stressed the need for timely, accurate reporting of independent-expenditure related expenses” (Image 201909269163573168).

On October 9, 2019, the RAD Analyst spoke with Mr. Giroux. The RAD Analyst explained that the issue included on the RFAIs dated August 22, 2019 referencing the Amended 2018 October Quarterly Report, received July 31, 2019 and Amended 2018 12-Day Pre-General Report, received July 31, 2019, could be referred to another office for potential further action. The Analyst explained that the Committee had not provided an adequate response to the RFAI, but informed Mr. Giroux that anything the Committee wished to submit on the public record would be taken into consideration, and encouraged Mr. Giroux to file anything that could provide further clarification (Attachment 5).

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

Americans for Prosperity Action, Inc. (AFP Action), (“the Committee”), amended its 2018 October Quarterly Report to disclose newly incurred debts totaling \$77,129.77 that were not disclosed on the original report (Attachment 4).

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 \$38,300.25 in debts on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Image 201810159124880750, Attachment 4).

On March 21, 2019, the Committee filed an Amended 2018 October Quarterly Report. The report disclosed \$103,311.51 in debts on Line 10 of the Summary Page. Of

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that amount, \$65,011.26 was disclosed on Schedule D as newly incurred debts for the reporting period that were not disclosed on the original report (Image 201903219145919425).

On June 2, 2019, an RFAI was sent to the Committee referencing the Amended 2018 October Quarterly Report, received March 21, 2019. The RFAI requested further clarification regarding the substantial increase in newly incurred debts disclosed on the Amended 2018 October Quarterly Report (Image 201906020300041236).

On July 1, 2019, the Committee filed an FEC Form 99, which stated, in part:

“Thank you for bringing these matters to our attention and for the opportunity to respond. We were in the process of preparing amendments when we received this request. The amendments filed concurrent with this report address the following: •Correction of debt amounts. The original Form 3X filed on October 15 did not contain all Independent Expenditures disseminated during the reporting period. They were subsequently reported on the amended Form 3X. As some of those Independent Expenditures included payments not yet made, their inclusion on the amended Form 3X required an update to the debt figures” (Image 201907019150437102).

On July 1, 2019, the Committee also filed an Amended 2018 October Quarterly Report. The report disclosed \$101,879.51 in debts on Line 10 of the Summary Page (Image 201907019150437056).

On July 31, 2019, the Committee filed an Amended 2018 October Quarterly Report. The Report disclosed \$115,430.02 in debts on Line 10 of the Summary Page. Of that amount, \$77,129.77 were disclosed on Schedule D as newly incurred debts for the reporting period that were not disclosed on the original report (Image 201907319161280620, Attachment 4).

On August 1, 2019, the Reports Analysis Division (RAD) Analyst spoke with Lindsey Melody, Counsel for the Committee. The Analyst explained that the increase in incurred debts referenced on the Amended 2018 October Quarterly Report, received March 21, 2019 could be referred to another office for potential further action. The Analyst explained that the Committee had not provided an adequate response to the RFAI dated June 2, 2019 and informed Ms. Melody that anything the Committee wished to submit on the public record would be taken into consideration, and encouraged her to file anything that could provide further clarification. Ms. Melody informed the Analyst that the Committee had filed an Amended 2018 October Quarterly Report on July 31, 2019, and requested the Analyst please review the amendment and let her know if further clarification was still necessary (Attachment 5).

On August 14, 2019, the RAD Analyst called Ms. Melody to inform her that the Committee’s Amended 2018 October Quarterly Report, received July 31, 2019 did not provide an adequate explanation to the RFAI dated June 2, 2019 regarding the Committee’s

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increase in debts. The Analyst reminded Ms. Melody that anything submitted on the public record will be taken into consideration (Attachment 5).

To date, no further communications have been received by the Committee regarding these matters.

O-Index (2019-2020)															
Cmte. ID: C00687103 Cmte. Name: AMERICANS FOR PROSPERITY ACTION, INC.(AFP ACTION)															
Treasurer Name: VARBAN, ALEX Address: 2200 WILSON BLVD. #102-177, ARLINGTON, VA 22201															
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			3/21/2019	6	201903220300270050				-	-	-	-	-	-	-
MS-T			3/21/2019	1	201903219145919423				-	-	-	-	-	-	-
MS-T			7/1/2019	1	201907019150437102				-	-	-	-	-	-	-
MS-T			7/1/2019	1	201907019150437326				-	-	-	-	-	-	-
MS-T			7/1/2019	1	201907019150437327				-	-	-	-	-	-	-
MS-T			7/31/2019	1	201907319161260177				-	-	-	-	-	-	-
MS-T			9/26/2019	1	201909269163573168				-	-	-	-	-	-	-
MS-T			9/26/2019	1	201909269163573173				-	-	-	-	-	-	-
F3XN	MY	N	7/31/2019	41	201907319161260242	1/1/2019	6/30/2019		\$2,535,364	\$8,199,227	\$120,047	\$10,614,544	\$3,073	-	\$3,073
F24N	48		1/7/2020	1	202001079167024690				-	-	-	-	-	-	-
F1A		A	5/7/2019	5	201905079149636625				-	-	-	-	-	-	-
F24N	48		7/1/2019	1	201907019150437194				-	-	-	-	-	-	-
F24N	48		7/1/2019	1	201907019150437205				-	-	-	-	-	-	-
F24N	24		7/1/2019	1	201907019150437317				-	-	-	-	-	-	-
F1A		A	1/25/2019	5	201901259143981467				-	-	-	-	-	-	-
F24N	48		11/22/2019	3	201911229166075278				-	-	-	-	-	-	-
Totals										\$8,199,227	\$120,047				

O-Index (2017-2018)															
Cmte. ID: C00687103 Cmte. Name: AMERICANS FOR PROSPERITY ACTION, INC.(AFP ACTION)															
Treasurer Name: VARBAN, ALEX Address: 2200 WILSON BLVD. #102-177, ARLINGTON, VA 22201															
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
RQ2	Q3	N	2/14/2019	5	201902140300030878	7/1/2018	9/30/2018	2/14/2019	-	-	-	-	-	-	-
RQ2	Q3	A	8/22/2019	3	201908220300046878	7/1/2018	9/30/2018	8/22/2019	-	-	-	-	-	-	-
RQ2	Q3	A	6/2/2019	2	201906020300041236	7/1/2018	9/30/2018	6/2/2019	-	-	-	-	-	-	-
RQ2	12G	A	8/22/2019	4	201908220300046881	10/1/2018	10/17/2018	8/22/2019	-	-	-	-	-	-	-
RQ2	12G	N	5/29/2019	7	201905290300040693	10/1/2018	10/17/2018	5/29/2019	-	-	-	-	-	-	-
RQ2	30G	A	6/2/2019	6	201906020300040970	10/18/2018	11/26/2018	6/2/2019	-	-	-	-	-	-	-
F3XN	Q3	N	10/15/2018	32	201810159124880749	7/1/2018	9/30/2018		\$0	\$7,152,231	\$3,351,000	\$3,801,230	\$38,300	-	\$38,300
F3XA	Q3	A	3/21/2019	41	201903219145919424	7/1/2018	9/30/2018		\$0	\$7,152,231	\$3,351,000	\$3,801,230	\$103,311	-	\$103,311
F3XA	Q3	A	7/1/2019	41	201907019150437055	7/1/2018	9/30/2018		\$0	\$7,152,231	\$3,351,000	\$3,801,230	\$101,879	-	\$101,879
F3XA	Q3	A	7/31/2019	43	201907319161280619	7/1/2018	9/30/2018		\$0	\$7,152,231	\$3,351,000	\$3,801,230	\$115,430	-	\$115,430
F3XN	12G	N	10/25/2018	53	201810259133306031	10/1/2018	10/17/2018		\$3,801,230	\$4,643,575	\$4,682,462	\$3,762,342	\$141,800	-	\$141,800
F3XA	12G	A	7/1/2019	69	201907019150437121	10/1/2018	10/17/2018		\$3,801,230	\$4,643,575	\$4,682,462	\$3,762,342	\$257,390	-	\$257,390
F3XA	12G	A	7/31/2019	70	201907319161280722	10/1/2018	10/17/2018		\$3,801,230	\$4,643,575	\$4,682,462	\$3,762,342	\$257,371	-	\$257,371
F3XN	30G	N	12/6/2018	77	201812069134542731	10/18/2018	11/26/2018		\$3,762,342	\$411,924	\$1,989,658	\$2,184,609	\$158,611	-	\$158,611
F3XA	30G	A	1/30/2019	77	201901309144182241	10/18/2018	11/26/2018		\$3,762,342	\$411,924	\$1,989,658	\$2,184,609	\$152,442	-	\$152,442
F3XA	30G	A	7/1/2019	77	201907019150437235	10/18/2018	11/26/2018		\$3,762,342	\$411,924	\$1,989,658	\$2,184,609	\$115,651	-	\$115,651
F3XA	30G	A	7/31/2019	77	201907319161281602	10/18/2018	11/26/2018		\$3,762,342	\$411,924	\$1,989,658	\$2,184,609	\$115,778	-	\$115,778
F3XN	YE	N	1/30/2019	20	201901309144194276	11/27/2018	12/31/2018		\$2,184,609	\$402,262	\$51,507	\$2,535,364	\$125,577	-	\$125,577
F3XA	YE	A	7/1/2019	23	201907019150437332	11/27/2018	12/31/2018		\$2,184,609	\$402,262	\$51,507	\$2,535,364	\$112,210	-	\$77,321
F3XA	YE	A	7/31/2019	23	201907319161281810	11/27/2018	12/31/2018		\$2,184,609	\$402,262	\$51,507	\$2,535,364	\$77,448	-	\$77,448
F1N		N	9/10/2018	5	201809109121659898				-	-	-	-	-	-	-
F24N	24		10/30/2018	1	201810309133558460				-	-	-	-	-	-	-
F24N	24		10/31/2018	1	201810319133568531				-	-	-	-	-	-	-

Americans for Prosperity Action, Inc. (AFP Action) (C00687103)

Amended 2018 October Quarterly Report, received July 31, 2019

48-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported/ Opposed	Election	48-Hour Report Filed
PRESSTIGE PRINTING	9/30/2018	\$43,981.40	NELSON, BILL	2018 General	12/6/2018
UNITED STATES POSTAL SERVICE	9/30/2018	\$154,723.86 <i>48-Hour Report Required</i>	NELSON, BILL	2018 General	12/6/2018
ARENA COMMUNICATIONS	9/20/2018	\$2,488.00 ² <i>48-Hour Report Required</i>	PAULSEN, ERIK	2018 General	12/6/2018

² The independent expenditure for Erik Paulsen included on this chart was inadvertently omitted from the RFAI sent referencing the Amended 2018 October Quarterly Report, received 7/31/19. The Committee made independent expenditures totaling \$14,569.57 disseminated on 9/20/18 and 9/22/18, and failed to include this amount on the 48-Hour Report filed on 9/24/18.

Americans for Prosperity Action, Inc. (AFP Action) (C00687103)
Amended 2018 12-Day Pre-General Report, received July 31, 2019

48-Hour Reports Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported/ Opposed	Election	48-Hour Report Filed
SINGULARIS GROUP	10/3/2018	\$1,819.64	HURD, WILLIAM	G2018	12/5/2018
SINGULARIS GROUP	10/3/2018	\$1,451.13	HURD, WILLIAM	G2018	12/5/2018
SINGULARIS GROUP	10/10/2018	\$1,388.30	HURD, WILLIAM	G2018	12/5/2018
SINGULARIS GROUP	10/10/2018	\$1,395.00	HURD, WILLIAM	G2018	12/5/2018
SINGULARIS GROUP	10/10/2018	\$1,126.00	HURD, WILLIAM	G2018	12/5/2018
SINGULARIS GROUP	10/10/2018	\$1,190.70	HURD, WILLIAM	G2018	12/5/2018
UNITED STATES POSTAL SERVICE	10/10/2018	\$1,365.43	HURD, WILLIAM	G2018	12/5/2018
UNITED STATES POSTAL SERVICE	10/10/2018	\$938.29	HURD, WILLIAM	G2018	12/5/2018
UNITED STATES POSTAL SERVICE	10/10/2018	\$1,365.74	HURD, WILLIAM	G2018	12/5/2018
UNITED STATES POSTAL SERVICE	10/10/2018	\$937.98 <i>48-Hour Report Required</i>	HURD, WILLIAM	G2018	12/5/2018
Singularis Group	10/10/2018	\$21,574.12 <i>48-Hour Report Required</i>	McCaskill, Claire	G2018	7/1/2019

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported/ Opposed	Election	48-Hour Report Filed
ARENA COMMUNICATIONS	10/10/2018	\$7,884.00	PAULSEN, ERIK	G2018	12/6/2018
UNITED STATES POSTAL SERVICE	10/10/2018	\$16,212.30 <i>48-Hour Report Required</i>	PAULSEN, ERIK	G2018	12/6/2018
ARENA COMMUNICATIONS	10/16/2018	\$6,889.00	PAULSEN, ERIK	G2018	12/6/2018
UNITED STATES POSTAL SERVICE	10/16/2018	\$13,798.65 <i>48-Hour Report Required</i>	PAULSEN, ERIK	G2018	12/6/2018
ARENA COMMUNICATIONS	10/8/2018	\$4,274.00	TESTER, JON	G2018	12/6/2018
UNITED STATES POSTAL SERVICE	10/8/2018	\$10,160.21 <i>48-Hour Report Required</i>	TESTER, JON	G2018	12/6/2018

Americans for Prosperity Action, Inc. (AFP Action) (C00687103)

2018 October Quarterly Report/Amended 2018 October Quarterly Report, received July 31, 2019

Overview of Additional Debt

Report Line	Original 2018 October Quarterly Report (Image 201810159124880750)	Amended 2018 October Quarterly Report Received 7/31/2019 (Image 201907319161280620)	Debt Variance Amount	Actual Increase in New Debts Incurred
Amount Incurred This Period (Schedule D)	\$38,300.25	\$115,430.02	\$77,129.77	\$77,129.77
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 (Schedule D)	\$38,300.25	\$115,430.02	\$77,129.77	
Line 10: Debts and Obligations Owed by the Committee	\$38,300.25	\$115,430.02	\$77,129.77	

Americans for Prosperity Action, Inc. (AFP Action) (C00687103)

2018 October Quarterly Report/Amended 2018 October Quarterly Report, received July 31, 2019

Detailed Overview of New Debts Incurred

Vendor	Outstanding Beginning Balance	Amount Incurred	Payments	Increase in Debt Incurred
Arena Communiation	\$0.00	\$15,888.00	\$0.00	\$1,056.00
Presstige Printing	\$0.00	\$43,981.40	\$0.00	\$43,981.40
Singularis Group	\$0.00	\$13,359.97	\$0.00	\$8,893.72
TalentWave, Inc.	\$0.00	\$22,886.51	\$0.00	\$13,550.51
THE LUKENS COMPANY	\$0.00	\$9,648.14	\$0.00	\$9,648.14
Total:	\$0.00	\$115,430.02	\$0.00	\$77,129.77