

**20L-02**

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 16, 2020

ANALYST: Michael Beckman

I. COMMITTEE: It Starts Today  
C00630012  
Jonathan Zucker, Treasurer  
237 Florida Avenue NW  
Washington, DC 20001

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)**

It Starts Today (“the Committee”) amended its 2018 October Monthly Report to disclose additional receipts totaling \$142,066.12 which were not disclosed on the original report (Attachment 2).

On October 13, 2018, the Committee filed its original 2018 October Monthly Report covering the period from September 1, 2018 through September 30, 2018. The report disclosed \$35,047.48 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and -\$144.04 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 201810139124545210, Attachment 2).

On July 29, 2019, the Committee filed an Amended 2018 October Monthly Report. The report disclosed \$166,525.35 in receipts on Line 11(a)(i) and \$0.00 in receipts on Line 11(a)(ii) of the Detailed Summary Page (Image 201907299152458827).

On August 9, 2019, the Committee filed another Amended 2018 October Monthly Report. The report disclosed \$176,969.56 in receipts on Line 11(a)(i) and \$0.00 in receipts on Line 11(a)(ii) of the Detailed Summary Page, an increase of \$142,066.12 from the original report (Image 201908099162204269, Attachment 2).

On October 8, 2019, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2018 October Monthly Report, received August 9, 2019. The RAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2018 October Monthly Report (Image 201910080300048628).

On October 23, 2019, Jonathan Zucker, the Committee's Treasurer, called the Reports Analysis Division (RAD) Analyst to discuss the RAI referencing the Amended 2018 October Report, received August 9, 2019. Mr. Zucker explained that the original 2018 October Monthly Report had inadvertently omitted earmarked receipts for the unnamed 2022 Democratic Senate candidate for Iowa, and that the applicable receipts had been included in the Amended 2018 October Monthly Report, received August 9, 2019. Mr. Zucker said that he intended to file an FEC Form 99 (Miscellaneous Electronic Submission) explaining the nature of the clerical error, and that the Committee had implemented procedures to ensure the mistake would not happen in the future (Attachment 3).

On October 25, 2019, the Committee filed an FEC Form 99 in response to the RAI referencing the Amended 2018 October Monthly Report, received August 9, 2019. The Committee stated, in part:

"The increase in reported donations resulted from a failure to report these donations in our initial filing; this amended filing is correct. The failure was due to a clerical error in how we "tagged" the "recipient" of these donations earmarked for the 2022 Democratic Nominee for U.S. Senate in Iowa in our database. Our database handles not only not only our federal activity, but also purely state-level activity for separately incorporated and operated state pacs aligned with our mission, and, therefore, we have a variety of settings for each of these related efforts; I got this one wrong. Due to this error, the donations were not included in our report. We periodically check our set-up to catch any mistakes and while the error was later corrected, I did not appreciate its import, which is why we did not file an amended report at the time we caught the error.

The vast majority of these donations were made September 28-30, which fell over a weekend and resulted in funding deposits in October, not September; this deprived us of an easy, common sense check on our initial filing. Furthermore, because the funds will not be distributed for years, there was no distribution in early October that would have also provided an opportunity to alert us to the omission. This is not a mistake we expect to make again and might not have made but for the nature of the recipient and the timing of the donations.

We already had systems in place to audit our "recipients" and make sure they are set-up correctly to ensure proper reporting of each donation (earmarked or not). We had been doing these sorts of audits periodically and in early 2019, I noticed the incorrect "tagging" and corrected it; unfortunately, I did not appreciate the import of the error: that it excluded

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these donations from our filings. Had I realized the impact of the error, we would have filed an amendment at that time. The fact that the error was corrected is why, when we filed amended reports to include aggregate donation information for recurring donors (based on the RFAI from July of this year), these missing contributions were included in our report and you noted the discrepancy. We strive never to repeat a mistake and have (a) learned how important this tag is to accurate reporting, (b) become more rigorous in our set-up procedures and, (c) become more frequent in our checks on nominee fund set-ups to ensure any error on set-up is quickly caught and corrected. We also now understand the import of this sort of error; should it occur again we would know to immediately file an amended report” (Image 201910259165300853).

On November 21, 2019, the RAD Analyst called Mr. Zucker and explained the Committee could be referred to the Commission for potential further enforcement action for the substantial increase in activity disclosed on their Amended 2018 October Monthly Report, received August 9, 2019. The RAD Analyst noted the Committee’s FEC Form 99 submitted on October 25, 2019, and advised the Committee could provide additional clarification if desired (Attachment 3).

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

O-Index (2019-2020)															
Cmte. ID: C00630012 Cmte. Name: IT STARTS TODAY															
Treasurer Name: ZUCKER, JONATHAN Address: 237 FLORIDA AVENUE NW, WASHINGTON, DC 20001															
Cmte. Type: N (NON-QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY 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			4/9/2019	1	201904099146057454				-	-	-	-	-	-	-
MS-T			10/25/2019	1	201910259165300853				-	-	-	-	-	-	-
RQ2	M4	N	7/17/2019	2	201907170300042737	3/1/2019	3/31/2019	7/17/2019	-	-	-	-	-	-	-
RQ2	M5	N	7/17/2019	2	201907170300042766	4/1/2019	4/30/2019	7/17/2019	-	-	-	-	-	-	-
RQ2	M6	N	7/24/2019	2	201907240300043008	5/1/2019	5/31/2019	7/24/2019	-	-	-	-	-	-	-
F3XN	M2	N	2/11/2019	16787	201902119145479212	1/1/2019	1/31/2019		\$3,494,977	\$36,985	\$6,924	\$3,525,037	-	-	\$0
F3XA	M2	A	8/9/2019	17180	201908099162724110	1/1/2019	1/31/2019		\$3,647,160	\$36,878	\$6,947	\$3,677,091	-	-	\$0
F3XN	M3	N	3/20/2019	16696	201903209145855052	2/1/2019	2/28/2019		\$3,525,037	\$79,583	\$5,284	\$3,599,336	-	-	\$0
F3XA	M3	A	8/9/2019	18105	201908099162741315	2/1/2019	2/28/2019		\$3,677,091	\$80,732	\$5,297	\$3,752,526	-	-	\$0
F3XN	M4	N	4/6/2019	16684	201904069146026129	3/1/2019	3/31/2019		\$3,599,336	\$18,179	\$5,856	\$3,611,659	-	-	\$0
F3XA	M4	A	8/9/2019	16840	201908099162759470	3/1/2019	3/31/2019		\$3,752,526	\$18,179	\$5,869	\$3,764,836	-	-	\$0
F3XN	M5	N	5/10/2019	16429	201905109149663178	4/1/2019	4/30/2019		\$3,611,659	\$31,840	\$6,755	\$3,636,744	-	-	\$0
F3XA	M5	A	8/9/2019	16747	201908099162776310	4/1/2019	4/30/2019		\$3,764,836	\$31,840	\$6,755	\$3,789,921	-	-	\$0
F3XN	M6	N	6/9/2019	16330	201906099149967565	5/1/2019	5/31/2019		\$3,636,744	\$36,772	\$4,446	\$3,669,070	-	-	\$0
F3XA	M6	A	8/9/2019	16711	201908099162793057	5/1/2019	5/31/2019		\$3,789,921	\$37,083	\$4,459	\$3,822,545	-	-	\$0
F3XN	M7	N	7/16/2019	16689	201907169151368569	6/1/2019	6/30/2019		\$3,669,070	\$20,618	\$4,034	\$3,685,654	-	-	\$0
F3XA	M7	A	8/9/2019	16993	201908099162809772	6/1/2019	6/30/2019		\$3,822,545	\$21,809	\$4,046	\$3,840,308	-	-	\$0
F3XN	M8	N	8/9/2019	16169	201908099162826769	7/1/2019	7/31/2019		\$3,840,308	\$13,022	\$180,849	\$3,672,481	-	-	\$0
F3XN	M9	N	9/18/2019	15969	201909189163373452	8/1/2019	8/31/2019		\$3,672,481	\$12,512	\$10,861	\$3,674,132	-	-	\$0
F3XN	M10	N	10/10/2019	15453	201910109163791427	9/1/2019	9/30/2019		\$3,674,132	\$13,283	\$2,784	\$3,684,631	-	-	\$0
F3XN	M11	N	11/20/2019	15673	201911209165784312	10/1/2019	10/31/2019		\$3,684,631	\$14,965	\$8,349	\$3,691,247	-	-	\$0
F3XN	M12	N	12/20/2019	15856	201912209166753214	11/1/2019	11/30/2019		\$3,691,247	\$15,501	\$14,787	\$3,691,962	-	-	\$0
<b>Totals</b>										<b>\$295,810</b>	<b>\$251,008</b>				

O-Index (2017-2018)															
Cmte. ID: C00630012 Cmte. Name: IT STARTS TODAY															
Treasurer Name: ZUCKER, JONATHAN Address: 237 FLORIDA AVENUE NW, WASHINGTON, DC 20001															
Cmte. Type: N (NON-QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER															
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MS-M			3/10/2018	1	201803109096531280				-	-	-	-	-	-	-
MS-O			3/19/2018	2	201803190300001222				-	-	-	-	-	-	-
RQ1		A	10/4/2017	2	201710040300093295			10/4/2017	-	-	-	-	-	-	-
RQ2	MY	N	11/7/2017	4	201711070300094580	1/1/2017	6/30/2017	11/7/2017	-	-	-	-	-	-	-
RQ7	MY		8/16/2017	2	201708160300091564	1/1/2017	6/30/2017	8/16/2017	-	-	-	-	-	-	-
RQ2	MY	A	10/29/2018	2	201810290300022925	1/1/2017	6/30/2017	10/29/2018	-	-	-	-	-	-	-
RQ2	YE	N	3/10/2019	2	201903100300034930	7/1/2017	12/31/2017	3/10/2019	-	-	-	-	-	-	-
RQ2	M2	N	3/6/2018	2	201803060300000563	1/1/2018	1/31/2018	3/6/2018	-	-	-	-	-	-	-
RQ2	M10	A	10/8/2019	2	201910080300048628	9/1/2018	9/30/2018	10/8/2019	-	-	-	-	-	-	-
F3XN	MY	N	9/5/2017	1672820	201709069072958958	1/1/2017	6/30/2017		\$5,000	\$210,248	\$67,625	\$57,139	-	-	\$0
F3XA	MY	A	12/5/2017	1428168	201712059087689382	1/1/2017	6/30/2017		\$5,000	\$194,386	\$68,894	\$130,491	-	-	\$0
F3XA	MY	A	4/18/2019	1428168	201904189146426887	1/1/2017	6/30/2017		\$5,000	\$194,386	\$68,894	\$130,491	-	-	\$0
F3XN	YE	N	1/31/2018	1634254	201802019092566175	7/1/2017	12/31/2017		\$130,491	\$212,451	\$128,950	\$213,993	-	-	\$0
F3XA	YE	A	4/18/2019	1634347	201904189147855079	7/1/2017	12/31/2017		\$130,491	\$212,451	\$128,950	\$213,993	-	-	\$0
F3XN	M2	N	2/13/2018	258863	201802139094278888	1/1/2018	1/31/2018		\$213,993	\$19,237	\$16,506	\$216,724	-	-	\$0

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F3XN	M3	N	3/20/2018	194121	201803209096677635	2/1/2018	2/28/2018		\$216,724	\$20,578	\$16,471	\$220,832	-	-	\$0
F3XN	M4	N	5/4/2018	232038	201805049111755826	3/1/2018	3/31/2018		\$220,832	\$23,922	\$5,483	\$239,271	-	-	\$0
F3XN	M5	N	5/20/2018	179117	201805219112198165	4/1/2018	4/30/2018		\$239,271	\$28,259	\$24,296	\$243,234	-	-	\$0
F3XA	M5	A	5/25/2018	221118	201805259113393029	4/1/2018	4/30/2018		\$239,271	\$32,005	\$24,296	\$246,979	-	-	\$0
F3XN	M6	N	6/20/2018	179744	201806209113931600	5/1/2018	5/31/2018		\$246,979	\$24,144	\$68,621	\$202,501	-	-	\$0
F3XA	M6	A	7/29/2019	171730	201907299151684368	5/1/2018	5/31/2018		\$246,979	\$23,048	\$68,621	\$201,406	-	-	\$0
F3XA	M6	A	8/8/2019	213968	201908089161368801	5/1/2018	5/31/2018		\$246,979	\$26,594	\$68,621	\$204,952	-	-	\$0
F3XN	M7	N	7/20/2018	184446	201807209115834264	6/1/2018	6/30/2018		\$202,501	\$25,646	\$100,636	\$127,511	-	-	\$0
F3XA	M7	A	7/29/2019	183978	201907299151859519	6/1/2018	6/30/2018		\$201,389	\$25,723	\$100,636	\$126,476	-	-	\$0
F3XA	M7	A	8/8/2019	213236	201908089161582915	6/1/2018	6/30/2018		\$204,952	\$30,314	\$100,636	\$134,630	-	-	\$0
F3XN	M8	N	8/11/2018	207692	201808119119392773	7/1/2018	7/31/2018		\$127,511	\$31,585	\$35,810	\$123,286	-	-	\$0
F3XA	M8	A	7/29/2019	207359	201907299152044786	7/1/2018	7/31/2018		\$126,476	\$31,585	\$35,810	\$122,251	-	-	\$0
F3XA	M8	A	8/8/2019	207820	201908089161796291	7/1/2018	7/31/2018		\$134,630	\$31,614	\$35,810	\$130,434	-	-	\$0
F3XN	M9	N	9/18/2018	198375	201809189121763846	8/1/2018	8/31/2018		\$123,286	\$31,097	\$72,859	\$81,524	-	-	\$0
F3XA	M9	A	7/29/2019	198845	201907299152254686	8/1/2018	8/31/2018		\$122,251	\$31,097	\$72,859	\$80,489	-	-	\$0
F3XA	M9	A	8/9/2019	199201	201908099162004118	8/1/2018	8/31/2018		\$130,434	\$31,118	\$72,859	\$88,693	-	-	\$0
F3XN	M10	N	10/13/2018	190348	201810139124545208	9/1/2018	9/30/2018		\$81,524	\$35,048	\$68,541	\$48,031	-	-	\$0
F3XA	M10	A	7/29/2019	192054	201907299152458825	9/1/2018	9/30/2018		\$80,489	\$166,669	\$68,541	\$178,618	-	-	\$0
F3XA	M10	A	8/9/2019	194681	201908099162204267	9/1/2018	9/30/2018		\$88,693	\$177,114	\$68,541	\$197,266	-	-	\$0
F3XN	12G	N	10/22/2018	124123	201810229130603911	10/1/2018	10/17/2018		\$48,031	\$3,434,419	\$21,937	\$3,460,513	-	-	\$0
F3XA	12G	A	12/5/2018	124126	201812059133972117	10/1/2018	10/17/2018		\$48,031	\$3,434,419	\$24,170	\$3,458,280	-	-	\$0
F3XA	12G	A	8/9/2019	171238	201908099162399176	10/1/2018	10/17/2018		\$197,266	\$3,437,382	\$24,170	\$3,610,478	-	-	\$0
F3XN	30G	N	12/5/2018	134714	201812059134176313	10/18/2018	11/26/2018		\$3,458,280	\$58,861	\$32,001	\$3,485,139	-	-	\$0
F3XA	30G	A	8/9/2019	135738	201908099162571643	10/18/2018	11/26/2018		\$3,610,478	\$58,887	\$32,029	\$3,637,336	-	-	\$0
F3XN	YE	N	1/31/2019	15955	201901319144228323	11/27/2018	12/31/2018		\$3,485,139	\$19,156	\$9,319	\$3,494,977	-	-	\$0
F3XA	YE	A	8/9/2019	16071	201908099162707740	11/27/2018	12/31/2018		\$3,637,336	\$19,159	\$9,335	\$3,647,160	-	-	\$0
F1A		A	8/7/2017	4	201708079070140508				-	-	-	-	-	-	-
F1A		A	10/5/2017	5	201710059075578927				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$4,314,769</b>	<b>\$672,608</b>				

O-Index (2015-2016)															
Cmte. ID: C00630012      Cmte. Name: IT STARTS TODAY															
Treasurer Name: ZUCKER, JONATHAN      Address: 237 FLORIDA AVENUE NW, WASHINGTON, DC 20001															
Cmte. Type: N (NON-QUALIFIED NON-PARTY)      Cmte. Designation: U (UNAUTHORIZED)      Filing Frequency: MONTHLY FILER															
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F3XN	YE	N	1/21/2017	6	201701219041437990	11/29/2016	12/31/2016		\$0	\$5,000	\$0	\$5,000	-	-	\$0
F1N		N	12/16/2016	4	201612169040612458				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$5,000</b>	<b>\$0</b>				

**It Starts Today (C00630012)**

2018 October Monthly Report/Amended 2018 October Monthly Report

Overview of Additional Receipts

<b>Report Line</b>	<b>Original 2018 October Monthly Report (Image 201810139124545210)</b>	<b>Amended 2018 October Monthly Report, received 8/9/2019 (Image 201908099162204269)</b>	<b>Variance Amount</b>
Line 11(a)(i): Itemized Contributions from Individuals	\$ 35,047.48	\$ 176,969.56	\$141,922.08
Line 11(a)(ii): Unitemized Contributions from Individuals	-\$144.04	\$0.00	\$144.04
		<b>Total:</b>	<b>\$142,066.12</b>