



## Interim Audit Report of the Audit Division on The 2016 Committee

(January 1, 2015 - December 31, 2016)

### Why the Audit Was Done

Federal law permits the Commission to conduct audits and field investigations of any political committee that is required to file reports under the Federal Election Campaign Act (the Act). The Commission generally conducts such audits when a committee appears not to have met the threshold requirements for substantial compliance with the Act.<sup>1</sup> The audit determines whether the committee complied with the limitations, prohibitions and disclosure requirements of the Act.

### Future Action

The Commission may initiate an enforcement action, at a later time, with respect to the matter discussed in this report.

### About the Committee (p. 2)

The 2016 Committee is a nonconnected, independent expenditure-only committee headquartered in Vienna, Virginia. For more information, see the chart on the Committee Organization, p. 2.

### Financial Activity (p. 2)

• <b>Receipts</b>		
○ Contributions from Individuals		\$ 12,851,480
○ Contributions from Political Party Committees	250	
○ Transfers from Affiliated/Other Party Committees		1,637,148
○ Offsets to Operating Expenditures		9,847
○ Other Receipts		521,418
<b>Total Receipts</b>		<b>\$ 15,020,143</b>
• <b>Disbursements</b>		
○ Operating Expenditures		\$ 8,542,586
○ Independent Expenditures		6,167,228
○ Contribution Refunds		52,525
<b>Total Disbursements</b>		<b>\$ 14,762,339</b>

### Finding and Recommendation (p. 3)

- Failure to File or Timely File 24/48-Hour Reports

<sup>1</sup> 52 U.S.C. §30111(b).



# **Interim Audit Report of the Audit Division on The 2016 Committee**

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**(January 1, 2015 - December 31, 2016)**

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# **Part I**

## **Background**

### **Authority for Audit**

This report is based on an audit of The 2016 Committee (T2C), undertaken by the Audit Division of the Federal Election Commission (the Commission) in accordance with the Federal Election Campaign Act of 1971, as amended (the Act). The Audit Division conducted the audit pursuant to 52 U.S.C. §30111(b), which permits the Commission to conduct audits and field investigations of any political committee that is required to file a report under 52 U.S.C. §30104. Prior to conducting any audit under this subsection, the Commission must perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act. 52 U.S.C. §30111(b).

### **Scope of Audit**

Following Commission-approved procedures, the Audit staff evaluated various risk factors and as a result, this audit examined:

1. the consistency between reported figures and bank records;
2. the disclosure of individual contributors' occupation and name of employer;
3. the disclosure of independent expenditures;
4. the disclosure of debts and obligations pertaining to independent and apparent independent expenditures;
5. the completeness of records; and
6. other committee operations necessary to the review.

## Part II

### Overview of Committee

### Committee Organization

<b>Important Dates</b>	
• Date of Registration	October 23, 2014
• Audit Coverage	January 1, 2015 - December 31, 2016
<b>Headquarters</b>	
	Vienna, VA
<b>Bank Information</b>	
• Bank Depositories	Three
• Bank Accounts	Four Checking
<b>Treasurer</b>	
• Treasurer When Audit Was Conducted	William Saracino ( 3/29/17 - Present)
• Treasurer During Period Covered by Audit	Chuck Muth ( 3/03/17 - 3/28/17) Robert H. Frank (10/23/14 - 3/02/17)
<b>Management Information</b>	
• Attended FEC Campaign Finance Seminar	No <sup>2</sup>
• Who Handled Accounting and Recordkeeping Tasks	Paid Staff

### Overview of Financial Activity (Audited Amounts)

<b>Cash-on-hand @ January 1, 2015</b>	<b>\$ 0</b>
<b>Receipts</b>	
○ Contributions from Individuals	12,851,480
○ Contributions from Political Party Committees	250
○ Transfers from Affiliated/Other Party Committees	1,637,148
○ Offsets to Operating Expenditures	9,847
○ Other Receipts	521,418
<b>Total Receipts</b>	<b>\$ 15,020,143</b>
<b>Disbursements</b>	
○ Operating Expenditures	8,542,586
○ Independent Expenditures	6,167,228
○ Contribution Refunds	52,525
<b>Total Disbursements</b>	<b>\$ 14,762,339</b>
<b>Cash-on-hand @ December 31, 2016</b>	<b>\$ 257,804</b>

<sup>2</sup> Staff members from a firm that provided legal advice to T2C have attended FEC campaign finance seminars.

## **Part III**

### **Summary**

### **Finding and Recommendation**

#### **Failure to File or Timely File 24/48-Hour Reports**

During audit fieldwork, the Audit staff reviewed disbursements to verify if T2C reported independent expenditures accurately and timely. The Audit staff identified 193 independent expenditures on Schedule E (Itemized Independent Expenditures) totaling \$3,310,371 for which 24/48-hour reports were filed untimely.<sup>3</sup> Additionally, the Audit staff identified disbursements, disclosed as operating expenditures on Schedule B (Itemized Disbursements), totaling \$369,669 that appeared to be independent expenditures for which 48-hour reports were required and not filed.

If T2C believes that it properly filed 24/48-hour reports for independent expenditures reported on Schedule E, the Audit staff recommends that T2C provide documentation to support its conclusion. Also, if T2C believes that the apparent independent expenditures totaling \$369,669 did not require reporting as independent expenditures, the Audit staff recommends that T2C provide evidence to support its conclusion. Absent such evidence, the Audit staff recommends T2C amend its reports to disclose these disbursements as independent expenditures and submit revised procedures for reporting independent expenditures. (For more detail, see p. 4)

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<sup>3</sup> Fourteen of these independent expenditures, totaling \$684,568, were disclosed on Schedule B as operating expenditures for which T2C untimely filed corresponding 48-hour reports. The Audit staff included these transactions because these transactions met the definition of an independent expenditure.

## Part IV

### Finding and Recommendation

#### Failure to File or Timely File 24/48-Hour Reports

##### Summary

During audit fieldwork, the Audit staff reviewed disbursements to verify if T2C reported independent expenditures accurately and timely. The Audit staff identified 193 independent expenditures on Schedule E (Itemized Independent Expenditures) totaling \$3,310,371 for which 24/48-hour reports were filed untimely.<sup>4</sup> Additionally, the Audit staff identified disbursements, disclosed as operating expenditures on Schedule B (Itemized Disbursements), totaling \$369,669 that appeared to be independent expenditures for which 48-hour reports were required and not filed.

If T2C believes that it properly filed 24/48-hour reports for independent expenditures reported on Schedule E, the Audit staff recommends that T2C provide documentation to support its conclusion. Also, if T2C believes that the apparent independent expenditures totaling \$369,669 did not require reporting as independent expenditures, the Audit staff recommends that T2C provide evidence to support its conclusion. Absent such evidence, the Audit staff recommends T2C amend its reports to disclose these disbursements as independent expenditures and submit revised procedures for reporting independent expenditures.

##### Legal Standard

**A. Definition of Independent Expenditures.** The term “independent expenditure” means an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate that is not made in coordination with any candidate or authorized committee or agent of a candidate. 11 CFR §100.16(a).

**B. Expressly Advocating.** Expressly advocating means any communication that –  
 (a) Uses phrases such as “vote for the president,” “re-elect your Congressman,” “support the Democratic nominee,” “cast your ballot for the Republican challenger for U.S. Senate in Georgia,” accompanied by a picture of one or more candidate(s), or communications of campaign slogan(s) or individual word(s), which in context can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidate(s).

(b) When taken as a whole and with limited reference to external events, such as the proximity to the election, could only be interpreted by a reasonable person as containing

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<sup>4</sup> Fourteen of these independent expenditures, totaling \$684,568, were disclosed on Schedule B as operating expenditures for which T2C untimely filed corresponding 48-hour reports. The Audit staff included these transactions because these transactions met the definition of an independent expenditure.

advocacy of the election or defeat of one or more clearly identified candidate(s). 11 CFR §100.22.

**C. Disclosure Requirements – General Guidelines.** An independent expenditure shall be reported on Schedule E if, when added to other independent expenditures made to the same payee during the same calendar year, it exceeds \$200. Independent expenditures made (i.e., publicly disseminated) prior to payment should be disclosed as memo entries on Schedule E and as a debt on Schedule D. Independent expenditures of \$200 or less need not be itemized, though the committee must report the total of those expenditures on line (b) on Schedule E. 11 CFR §§104.3(b)(3)(vii), 104.4(a) and 104.11.

**D. Last Minute Independent Expenditure Reports (24-Hour Reports).** Any independent expenditures aggregating \$1,000 or more with respect to any given election, and made after the 20<sup>th</sup> day but more than 24 hours before the day of an election must be reported and the report must be received by the Commission within 24 hours after the expenditure is made. A 24-hour report is required for each additional \$1,000 that aggregates. The 24-hour report must be filed on a Schedule E. The date that a communication is publicly disseminated serves as the date that the Committee must use to determine whether the total amount of independent expenditures has, in the aggregate, reached or exceeded the threshold reporting amount of \$1,000. 11 CFR §§104.4(f) and 104.5(g)(2).

**E. Independent Expenditure Reports (48-Hour Reports).** Any independent expenditures aggregating \$10,000 or more for an election in any calendar year, up to and including the 20th day before an election, must be disclosed within 48 hours each time the expenditures aggregate \$10,000 or more. The 48-hour report must be filed on a Schedule E. The date that communication is publicly disseminated serves as the date that the committee must use to determine whether the total amount of independent expenditures has, in the aggregate, reached or exceeded the threshold reporting amount of \$10,000. The reports must be filed with the Commission within 48 hours after the expenditure is made. 11 CFR §§104.4(f) and 104.5(g)(1).

## **Facts and Analysis**

### **A. Facts**

During audit fieldwork, the Audit staff reviewed disbursements to verify if T2C reported independent expenditures correctly and to verify that 24/48-hour reports were filed accurately and timely.

#### 24/48-Hour Reports for Independent Expenditures Reported on Schedule E - \$3,310,371:

- For expenditures totaling \$60,500, 24-hour reports for two items were not filed timely. For these expenditures, 24-hour reports were filed two days after the dissemination date, resulting in the reports being filed one day late.

- For expenditures totaling \$3,249,871, 48-hour reports for 191 items were not filed timely. For these expenditures, 48-hour reports were filed between 39 and 215 days after the dissemination date.<sup>5</sup>

The Audit staff notes the following with respect to the above untimely filed 24/48-hour reports:

- Copies of the communications were not provided for 56 expenditures totaling \$493,740. However, the Audit staff included these transactions in the amounts above because T2C's records contained internal codes and details for these communications similar to ones for which communications were provided.
- Records were not provided showing the dissemination date reported on disclosure reports for 61 expenditures totaling \$867,216. Of the 61 disbursements, 35 totaling \$693,905 were for disbursements related to various categories of items sold by T2C on its online store, which included printing costs related to a book entitled "Ben Carson: RX for America" (\$277,921); as well as other items such as clothing, decals, mugs, notepads, supporter cards, yard signs, magnets and buttons (\$415,984). There were 26 disbursements totaling \$173,311 related to direct mail printing, graphics, postage and list maintenance (\$136,364) and advertising, media buys and consulting (\$36,947).

Dissemination Date for Independent Expenditures Reported on Schedule E - \$4,389,206:

Based on a comparison between disclosure reports and the records provided by T2C, the Audit staff determined that for 158 expenditures totaling \$4,389,206, the dissemination dates disclosed on Schedule E were the dates T2C *paid* for the communication, rather than the date each communication was disseminated.

The dissemination dates disclosed by T2C should have been the date on which each communication was publicly distributed, pursuant to 11 CFR §§104.4(f) and 104.5(g)(1) and (2).

Reporting of Apparent Independent Expenditures on Schedule B - \$369,669

The Audit staff identified eleven apparent independent expenditures, disclosed on Schedule B totaling \$369,669, for which 48-hour reports were not filed. These transactions were related to the printing of the book discussed above, direct mail pieces, direct mail postage and direct mail consulting. The breakdown of these eleven items, relative to 11 CFR §100.22, is as follows:

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<sup>5</sup> Based upon T2C's records provided to the Audit staff, the dissemination dates for these independent expenditures ranged from March through December, 2015. Corresponding 48-hour reports were untimely filed with the Commission between December 2015 and April 2016.

**1. Apparent Independent Expenditures (Associated documentation provided - 11 CFR §100.22(a))**

T2C failed to file 48-hour reports for eight apparent independent expenditures totaling \$275,176 reported on Schedule B as operating expenditures. These transactions were for materials that contained language expressly advocating the election of a clearly identified candidate for President, Ben Carson.

**2. Apparent Independent Expenditures (Associated documentation provided - 11 CFR §100.22(b))**

T2C failed to file 48-hour reports for three apparent independent expenditures totaling \$94,493 for direct mail postage and other costs related to direct mail which it reported on Schedule B as operating expenditures. One postage payment was associated with a direct mail piece encouraging readers to vote for Ben Carson to keep him on the Republican ticket. A second postage payment was related to a communication encouraging actions to elect Donald Trump and defeat Hillary Clinton. These communications each contain unmistakable language that could only be interpreted by a reasonable person as containing advocacy of the election or defeat of clearly identified candidates.

**B. Interim Audit Report & Audit Division Recommendation**

The Audit staff discussed this matter with T2C representatives at the exit conference and provided supporting work papers. In response to the exit conference, T2C provided copies of invoices and mailer documentation related to the independent expenditures, which are included in the facts noted above.

The Audit staff recommends that, within 30 calendar days of service of this report, T2C provide documentation to support that the 24/48-hour reports totaling \$3,310,371 were filed accurately and timely. Supporting documentation should include the actual date of public dissemination for each communication. Also, if T2C believes that the eleven apparent independent expenditures disclosed on Schedule B totaling \$369,669 did not require reporting as independent expenditures, the Audit staff recommends that T2C provide evidence to support its conclusion. Absent such evidence, the Audit staff recommends T2C amend its reports to disclose these disbursements as independent expenditures and submit revised procedures for reporting independent expenditures.

The 2016 Committee  
Failure to File or Timely File 24/48 Hour Reports

Vendor Name per Crite Database	Transaction Date per Crite Database (Violation Date)	Amount per Crite Database (Violation Amount)	SOL 5 Years	SOL 5 Years+ 53 days (per tolling agreement)	Referable Amount Dropped as of 10/28/2019	Referable Amount Still Viable as of 10/28/2019
1 Directmail.Com	3/16/2015	\$62,857.14	3/16/2020	5/8/2020	\$0.00	\$62,857.14
2 Zip Mailing Services, Inc.	3/16/2015	\$25,044.64	3/16/2020	5/8/2020	\$0.00	\$25,044.64
3 MDI Imaging & Mail	3/23/2015	\$32,116.07	3/23/2020	5/15/2020	\$0.00	\$32,116.07
4 RST Marketing	4/13/2015	\$60,617.86	4/13/2020	6/5/2020	\$0.00	\$60,617.86
5 RST Marketing	4/20/2015	\$58,437.50	4/20/2020	6/12/2020	\$0.00	\$58,437.50
6 Advanced Response Systems	5/4/2015	\$27,156.25	5/4/2020	6/26/2020	\$0.00	\$27,156.25
7 Directmail.Com	5/4/2015	\$56,669.64	5/4/2020	6/26/2020	\$0.00	\$56,669.64
8 Advanced Response Systems	5/18/2015	\$93,254.46	5/18/2020	7/10/2020	\$0.00	\$93,254.46
9 RST Marketing	5/18/2015	\$40,150.00	5/18/2020	7/10/2020	\$0.00	\$40,150.00
10 Omega List Company	6/15/2015	\$96,046.46	6/15/2020	8/7/2020	\$0.00	\$96,046.46
11 RST Marketing	6/15/2015	\$28,551.17	6/15/2020	8/7/2020	\$0.00	\$28,551.17
12 Bieber Communications	6/22/2015	\$24,555.14	6/22/2020	8/14/2020	\$0.00	\$24,555.14
13 RST Marketing	6/29/2015	\$29,611.61	6/29/2020	8/21/2020	\$0.00	\$29,611.61
14 Zip Mailing Services, Inc.	6/29/2015	\$49,500.00	6/29/2020	8/21/2020	\$0.00	\$49,500.00
15 Direct Answer	7/12/2015	\$20,963.99	7/12/2020	8/24/2020	\$0.00	\$20,963.99
16 Direct Answer	7/12/2015	\$2,455.36	7/12/2020	8/24/2020	\$0.00	\$2,455.36
17 A1 Van Ad Items	7/7/2015	\$1,620.54	7/7/2020	8/29/2020	\$0.00	\$1,620.54
18 Bieber Communications	7/7/2015	\$9,300.89	7/7/2020	8/29/2020	\$0.00	\$9,300.89
19 Advanced Response Systems	7/13/2015	\$27,101.53	7/13/2020	9/4/2020	\$0.00	\$27,101.53
20 Campaign Funding Direct	7/13/2015	\$26,726.07	7/13/2020	9/4/2020	\$0.00	\$26,726.07
21 CP Direct	7/13/2015	\$15,341.42	7/13/2020	9/4/2020	\$0.00	\$15,341.42
22 Direct Answer	7/13/2015	\$13,938.53	7/13/2020	9/4/2020	\$0.00	\$13,938.53
23 Directmail.Com	7/13/2015	\$9,202.93	7/13/2020	9/4/2020	\$0.00	\$9,202.93
24 Directmail.Com	7/13/2015	\$11,771.44	7/13/2020	9/4/2020	\$0.00	\$11,771.44
25 MDI Imaging & Mail	7/13/2015	\$260.06	7/13/2020	9/4/2020	\$0.00	\$260.06
26 Omega List Company	7/13/2015	\$30,441.87	7/13/2020	9/4/2020	\$0.00	\$30,441.87
27 Westland Printers	7/13/2015	\$150,259.07	7/13/2020	9/4/2020	\$0.00	\$150,259.07
28 Westland Printers	7/13/2015	\$2,946.43	7/13/2020	9/4/2020	\$0.00	\$2,946.43
29 Zip Mailing Services, Inc.	7/13/2015	\$1,421.53	7/13/2020	9/4/2020	\$0.00	\$1,421.53
30 Bieber Communications	7/17/2015	\$400.00	7/17/2020	9/8/2020	\$0.00	\$400.00
31 Bieber Communications	7/17/2015	\$400.00	7/17/2020	9/8/2020	\$0.00	\$400.00
32 Bieber Communications	7/17/2015	\$712.05	7/17/2020	9/8/2020	\$0.00	\$712.05
33 Bieber Communications	7/17/2015	\$2,100.00	7/17/2020	9/8/2020	\$0.00	\$2,100.00
34 Bieber Communications	7/17/2015	\$2,100.00	7/17/2020	9/8/2020	\$0.00	\$2,100.00
35 Bieber Communications	7/17/2015	\$3,107.50	7/17/2020	9/8/2020	\$0.00	\$3,107.50
36 Campaign Funding Direct Inc	7/20/2015	\$2,478.21	7/20/2020	9/11/2020	\$0.00	\$2,478.21
37 Westland Printers	7/20/2015	\$2,946.43	7/20/2020	9/11/2020	\$0.00	\$2,946.43
38 Zip Mailing Services, Inc.	7/20/2015	\$9,821.43	7/20/2020	9/11/2020	\$0.00	\$9,821.43
39 Direct Answer	7/22/2015	\$12,283.17	7/22/2020	9/13/2020	\$0.00	\$12,283.17
40 Advanced Response Systems	7/27/2015	\$27,500.00	7/27/2020	9/18/2020	\$0.00	\$27,500.00
41 ADZIG	7/27/2015	\$4,453.80	7/27/2020	9/18/2020	\$0.00	\$4,453.80
42 Direct Answer	7/27/2015	\$368.24	7/27/2020	9/18/2020	\$0.00	\$368.24
43 Direct Answer	7/27/2015	\$3,116.53	7/27/2020	9/18/2020	\$0.00	\$3,116.53
44 Direct Answer	7/27/2015	\$4,548.53	7/27/2020	9/18/2020	\$0.00	\$4,548.53
45 Sisk Fulfillment Services	7/27/2015	\$2,379.55	7/27/2020	9/18/2020	\$0.00	\$2,379.55
46 Campaign Funding Direct	8/3/2015	\$1,005.19	8/3/2020	9/25/2020	\$0.00	\$1,005.19
47 Campaign Funding Direct	8/3/2015	\$148.50	8/3/2020	9/25/2020	\$0.00	\$148.50

First SOL Date 5/8/20  
Last SOL Date 11/18/21

The 2016 Committee  
Failure to File or Timely File 24/48 Hour Reports

First SOL Date 5/8/20  
Last SOL Date 11/18/21

Vendor Name per Crite Database	Transaction Date per Crite Database (Violation Date)	Amount per Crite Database (Violation Amount)	SOL 5 Years	SOL 5 Years+ 53 days (per tolling agreement)	Referable Amount Dropped as of 10/28/2019	Referable Amount Still Viable as of 10/28/2019
48 ECG Data Center	8/3/2015	\$437.91	8/3/2020	9/25/2020	\$0.00	\$437.91
49 MD1 Imaging & Mail	8/3/2015	\$265.17,86	8/3/2020	9/25/2020	\$0.00	\$26,517.86
50 Omega List Company	8/3/2015	\$15,846,49	8/3/2020	9/25/2020	\$0.00	\$15,846,49
51 Sisk Fulfillment Services	8/3/2015	\$4,091,66	8/3/2020	9/25/2020	\$0.00	\$4,091,66
52 Westland Printers	8/3/2015	\$2,848,21	8/3/2020	9/25/2020	\$0.00	\$2,848,21
53 Zip Mailing Services, Inc.	8/3/2015	\$1,964,29	8/3/2020	9/25/2020	\$0.00	\$1,964,29
54 Direct Answer	8/5/2015	\$21,207,89	8/5/2020	9/27/2020	\$0.00	\$21,207,89
55 Advanced Response Systems	8/10/2015	\$1,473,21	8/10/2020	10/2/2020	\$0.00	\$1,473,21
56 Campaign Funding Direct	8/10/2015	\$17,241,78	8/10/2020	10/2/2020	\$0.00	\$17,241,78
57 D&D Unlimited, Inc.	8/10/2015	\$2,142,09	8/10/2020	10/2/2020	\$0.00	\$2,142,09
58 ECG Data Center	8/10/2015	\$98,21	8/10/2020	10/2/2020	\$0.00	\$98,21
59 ECG Data Center	8/10/2015	\$2,002,91	8/10/2020	10/2/2020	\$0.00	\$2,002,91
60 MD1IMAGING & MAIL	8/10/2015	\$61,11	8/10/2020	10/2/2020	\$0.00	\$61,11
61 RST Marketing	8/10/2015	\$9,826,91	8/10/2020	10/2/2020	\$0.00	\$9,826,91
62 Sisk Fulfillment Services	8/10/2015	\$1,044,71	8/10/2020	10/2/2020	\$0.00	\$1,044,71
63 Westland Printers	8/10/2015	\$24,809,44	8/10/2020	10/2/2020	\$0.00	\$24,809,44
64 Zip Mailing Services, Inc.	8/10/2015	\$174,86	8/10/2020	10/2/2020	\$0.00	\$174,86
65 Campaign Funding Direct	8/17/2015	\$19,622,71	8/17/2020	10/9/2020	\$0.00	\$19,622,71
66 ECG Data Center	8/17/2015	\$465,36	8/17/2020	10/9/2020	\$0.00	\$465,36
67 MD1IMAGING & MAIL	8/17/2015	\$671,73	8/17/2020	10/9/2020	\$0.00	\$671,73
68 OMEGA LIST COMPANY	8/17/2015	\$6,305,48	8/17/2020	10/9/2020	\$0.00	\$6,305,48
69 Omega List Company	8/17/2015	\$12,560,27	8/17/2020	10/9/2020	\$0.00	\$12,560,27
70 Sisk Fulfillment Services	8/17/2015	\$4,058,17	8/17/2020	10/9/2020	\$0.00	\$4,058,17
71 Zip Mailing Services, Inc.	8/17/2015	\$12,276,79	8/17/2020	10/9/2020	\$0.00	\$12,276,79
72 Bieber Communications	8/20/2015	\$47,378,57	8/20/2020	10/12/2020	\$0.00	\$47,378,57
73 Direct Answer	8/20/2015	\$1,272,63	8/20/2020	10/12/2020	\$0.00	\$1,272,63
74 ADZIG	8/24/2015	\$4,816,41	8/24/2020	10/16/2020	\$0.00	\$4,816,41
75 Campaign Funding Direct	8/24/2015	\$909,07	8/24/2020	10/16/2020	\$0.00	\$909,07
76 Rst Marketing	8/24/2015	\$63,078,13	8/24/2020	10/16/2020	\$0.00	\$63,078,13
77 Bieber Communications	8/26/2015	\$2,342,41	8/26/2020	10/18/2020	\$0.00	\$2,342,41
78 Direct Answer	8/27/2015	\$13,486,79	8/27/2020	10/19/2020	\$0.00	\$13,486,79
79 CP Direct	8/31/2015	\$7,527,14	8/31/2020	10/23/2020	\$0.00	\$7,527,14
80 CP Direct	8/31/2015	\$16,920,36	8/31/2020	10/23/2020	\$0.00	\$16,920,36
81 Direct Answer	8/31/2015	\$149,585,49	8/31/2020	10/23/2020	\$0.00	\$149,585,49
82 Fund Raising Strategies, Inc.	8/31/2015	\$2,209,82	8/31/2020	10/23/2020	\$0.00	\$2,209,82
83 RST Marketing	8/31/2015	\$1,178,57	8/31/2020	10/23/2020	\$0.00	\$1,178,57
84 ADZIG	9/4/2015	\$17,683,48	9/4/2020	10/27/2020	\$0.00	\$17,683,48
85 Bieber Communications	9/4/2015	\$60,052,14	9/4/2020	10/27/2020	\$0.00	\$60,052,14
86 Sisk Fulfillment Services	9/8/2015	\$9,551,00	9/8/2020	10/31/2020	\$0.00	\$9,551,00
87 Zip Mailing Services, Inc.	9/8/2015	\$12,964,29	9/8/2020	10/31/2020	\$0.00	\$12,964,29
88 Bieber Communications	9/10/2015	\$100,349,46	9/10/2020	11/2/2020	\$0.00	\$100,349,46
89 Campaign Funding Direct	9/14/2015	\$22,489,37	9/14/2020	11/6/2020	\$0.00	\$22,489,37
90 Colortree Group, Inc.	9/14/2015	\$9,773,16	9/14/2020	11/6/2020	\$0.00	\$9,773,16
91 CP Direct	9/14/2015	\$15,785,29	9/14/2020	11/6/2020	\$0.00	\$15,785,29
92 D&D Unlimited, Inc.	9/14/2015	\$1,472,39	9/14/2020	11/6/2020	\$0.00	\$1,472,39
93 ECG Data Center	9/14/2015	\$3,562,26	9/14/2020	11/6/2020	\$0.00	\$3,562,26
94 Omega List Company	9/14/2015	\$6,542,05	9/14/2020	11/6/2020	\$0.00	\$6,542,05

**\$1,364,002.08 - Amount that expires**

First SOI Date	5/8/20
Last SOI Date	11/18/21

**The 2016 Committee**  
**Failure to File or Timely File 24/48 Hour Reports**

Vendor Name Per Crate Database	Transaction Date per Crate Database (Violation Date)	Amount per Crate Database (Violation Amount)	SOL 5 Years	SOI 5 Years+ 53 days (per tolling agreement)	Referable Amount Dropped as of 10/28/2019	Referable Amount Still Viable as of 10/28/2019
915 RST Marketing	9/14/2015	\$20,919.64	9/14/2020	11/6/2020	\$0.00	\$20,919.64
916 RST Marketing	9/14/2015	\$40,729.60	9/14/2020	11/6/2020	\$0.00	\$40,729.60
917 Tri State Envelope Corp.	9/14/2015	\$2,485.04	9/14/2020	11/6/2020	\$0.00	\$2,485.04
918 A1 Van Ad Items	9/21/2015	\$2,946.43	9/21/2020	11/13/2020	\$0.00	\$2,946.43
919 Campaign Funding Direct	9/21/2015	\$4,863.60	9/21/2020	11/13/2020	\$0.00	\$4,863.60
100 COLORTREE GROUP, INC.	9/21/2015	\$7,969.73	9/21/2020	11/13/2020	\$0.00	\$7,969.73
101 CP Direct	9/21/2015	\$22,587.03	9/21/2020	11/13/2020	\$0.00	\$22,587.03
102 Directmail.Com	9/21/2015	\$27,500.00	9/21/2020	11/13/2020	\$0.00	\$27,500.00
103 ECG DATA CENTER	9/21/2015	\$335.88	9/21/2020	11/13/2020	\$0.00	\$335.88
104 MDI IMAGING & MAIL	9/21/2015	\$114.38	9/21/2020	11/13/2020	\$0.00	\$114.38
105 OMEGA LIST COMPANY	9/21/2015	\$27.50	9/21/2020	11/13/2020	\$0.00	\$27.50
106 OMEGA LIST COMPANY	9/21/2015	\$7,106.44	9/21/2020	11/13/2020	\$0.00	\$7,106.44
107 RST MARKETING	9/21/2015	\$11,785.71	9/21/2020	11/13/2020	\$0.00	\$11,785.71
108 Zip Mailing Services, Inc.	9/21/2015	\$11,667.72	9/21/2020	11/13/2020	\$0.00	\$11,667.72
109 Direct Answer	9/24/2015	\$3,170.58	9/24/2020	11/16/2020	\$0.00	\$3,170.58
110 Campaign Funding Direct	9/28/2015	\$25,753.65	9/28/2020	11/20/2020	\$0.00	\$25,753.65
111 Campaign Funding Direct	9/28/2015	\$2,662.49	9/28/2020	11/20/2020	\$0.00	\$2,662.49
112 Colortree Group, Inc.	9/28/2015	\$5,042.74	9/28/2020	11/20/2020	\$0.00	\$5,042.74
113 CP DIRECT	9/28/2015	\$4,752.49	9/28/2020	11/20/2020	\$0.00	\$4,752.49
114 Direct Answer	9/28/2015	\$9,330.36	9/28/2020	11/20/2020	\$0.00	\$9,330.36
115 ECG DATA CENTER	9/28/2015	\$2,117.06	9/28/2020	11/20/2020	\$0.00	\$2,117.06
116 MDI Imaging & Mail	9/28/2015	\$2,244.23	9/28/2020	11/20/2020	\$0.00	\$2,244.23
117 RST MARKETING	9/29/2015	\$392.86	9/29/2020	11/21/2020	\$0.00	\$392.86
118 Westland Printers	9/28/2015	\$24,097.97	9/28/2020	11/20/2020	\$0.00	\$24,097.97
119 ADZIG	10/5/2015	\$5,485.48	10/5/2020	11/27/2020	\$0.00	\$5,485.48
120 Campaign Funding Direct	10/5/2015	\$1,051.78	10/5/2020	11/27/2020	\$0.00	\$1,051.78
121 Campaign Funding Direct	10/5/2015	\$1,149.11	10/5/2020	11/27/2020	\$0.00	\$1,149.11
122 Campaign Funding Direct	10/5/2015	\$88.39	10/5/2020	11/27/2020	\$0.00	\$88.39
123 Campaign Funding Direct	10/5/2015	\$4,406.76	10/5/2020	11/27/2020	\$0.00	\$4,406.76
124 CP Direct	10/5/2015	\$11,816.50	10/5/2020	11/27/2020	\$0.00	\$11,816.50
125 ECG Data Center	10/5/2015	\$1,822.20	10/5/2020	11/27/2020	\$0.00	\$1,822.20
126 MDI Imaging & Mail	10/5/2015	\$1,201.62	10/5/2020	11/27/2020	\$0.00	\$1,201.62
127 MDI Imaging & Mail	10/12/2015	\$11,294.64	10/5/2020	11/27/2020	\$0.00	\$11,294.64
128	10/5/2015	\$4,120.28	10/5/2020	11/27/2020	\$0.00	\$4,120.28
129 Omega List Company	10/5/2015	\$16,817.05	10/5/2020	11/27/2020	\$0.00	\$16,817.05
130 Zip Mailing Services, Inc.	10/5/2015	\$73.46	10/5/2020	11/27/2020	\$0.00	\$73.46
131 AMP Calypso, Inc.	10/9/2015	\$6,308.30	10/9/2020	12/4/2020	\$0.00	\$6,308.30
132 Campaign Funding Direct	10/12/2015	\$470.54	10/12/2020	12/4/2020	\$0.00	\$470.54
133 Campaign Funding Direct	10/12/2015	\$8,219.47	10/12/2020	12/4/2020	\$0.00	\$8,219.47
134 ECG Data Center	10/12/2015	\$4,172.43	10/12/2020	12/4/2020	\$0.00	\$4,172.43
135 Omega List Company	10/12/2015	\$25,411.98	10/12/2020	12/4/2020	\$0.00	\$25,411.98
136 Tri State Envelope Corp.	10/12/2015	\$1,697.15	10/12/2020	12/4/2020	\$0.00	\$1,697.15
137 Zip Mailing Services, Inc.	10/12/2015	\$51,660.71	10/12/2020	12/4/2020	\$0.00	\$51,660.71
138 ADZIG	10/13/2015	\$5,031.96	10/13/2020	12/5/2020	\$0.00	\$5,031.96
139 A1 Van Ad Items	10/15/2015	\$9,418.75	10/15/2020	12/7/2020	\$0.00	\$9,418.75
140 AMP Calypso, Inc.	10/15/2015	\$4,125.00	10/15/2020	12/7/2020	\$0.00	\$4,125.00
141 Bieber Communications	10/15/2015	\$13,871.79	10/15/2020	12/7/2020	\$0.00	\$13,871.79

**The 2016 Committee**  
**Failure to File or Timely File 24/48 Hour Reports**

<i>First SOL Date</i>	<b>5/8/20</b>
<i>Last SOL Date</i>	<b>11/18/21</b>

Vendor Name per Case Database	Transaction Date per Case Database (Violation Date)	Amount per Case Database (Violation Amount)	SOL 5 Years	SOL 5 Years+ 53 days (per tolling agreement)	Referrable Amount 10/28/2019	Referrable Amount Still Viable as of 10/28/2019
142 ADZIG	10/19/2015	\$14,972.18	10/19/2020	12/11/2020	\$0.00	\$14,972.18
143 Campaign Funding Direct	10/19/2015	\$53,801.42	10/19/2020	12/11/2020	\$0.00	\$33,801.42
144 Colortree Group, Inc.	10/19/2015	\$5,804.48	10/19/2020	12/11/2020	\$0.00	\$5,804.48
145 D&D Unlimited, Inc.	10/19/2015	\$5,704.52	10/19/2020	12/11/2020	\$0.00	\$5,704.52
146 Directmail.com	10/19/2015	\$7,495.89	10/19/2020	12/11/2020	\$0.00	\$7,495.89
147 ECG Data Center	10/19/2015	\$586.45	10/19/2020	12/11/2020	\$0.00	\$586.45
148 MDI Imaging & Mail	10/19/2015	\$403.64	10/19/2020	12/11/2020	\$0.00	\$403.64
149 MDI Imaging & Mail	10/19/2015	\$2,946.43	10/19/2020	12/11/2020	\$0.00	\$2,946.43
150 Omega List Company	10/19/2015	\$32,529.79	10/19/2020	12/11/2020	\$0.00	\$32,529.79
151 RST Marketing	10/19/2015	\$6,875.00	10/19/2020	12/11/2020	\$0.00	\$6,875.00
152 Sisk Fulfillment Services	10/19/2015	\$4,256.69	10/19/2020	12/11/2020	\$0.00	\$4,256.69
153 Sisk Fulfillment Services	10/19/2015	\$5,382.8	10/19/2020	12/11/2020	\$0.00	\$5,382.8
154 Zip Mailing Services, Inc.	10/19/2015	\$4,702.15	10/19/2020	12/11/2020	\$0.00	\$4,702.15
155 Advanced Response Systems	10/26/2015	\$30,965.77	10/26/2020	12/18/2020	\$0.00	\$30,965.77
156 Campaign Funding Direct	10/26/2015	\$22,491.49	10/26/2020	12/18/2020	\$0.00	\$22,491.49
157 Chocklett Press	10/26/2015	\$6,378.59	10/26/2020	12/18/2020	\$0.00	\$6,378.59
158 Colortree Group, Inc.	10/26/2015	\$4,832.61	10/26/2020	12/18/2020	\$0.00	\$4,832.61
159 MDI Imaging & Mail	10/26/2015	\$39.23	10/26/2020	12/18/2020	\$0.00	\$39.23
160 RST Marketing	10/26/2015	\$73,955.36	10/26/2020	12/18/2020	\$0.00	\$73,955.36
161 The Alabama Booksmit	10/26/2015	\$25,790.79	10/26/2020	12/18/2020	\$0.00	\$25,790.79
162 Zip Mailing Services, Inc.	10/26/2015	\$255.52	10/26/2020	12/18/2020	\$0.00	\$255.52
163 Omega List Company	11/9/2015	\$20,739.32	11/9/2020	1/11/2021	\$0.00	\$20,739.32
164 Direct Answer	11/25/2015	\$1,620.54	11/25/2020	1/17/2021	\$0.00	\$1,620.54
165 Direct Answer	11/25/2015	\$7,919.02	11/25/2020	1/17/2021	\$0.00	\$7,919.02
166 ADZIG	12/7/2015	\$14,661.75	12/7/2020	1/29/2021	\$0.00	\$14,661.75
167 Campaign Funding Direct	12/7/2015	\$11,785.71	12/7/2020	1/29/2021	\$0.00	\$11,785.71
168 Campaign Funding Direct	12/7/2015	\$39,032.26	12/7/2020	1/29/2021	\$0.00	\$39,032.26
169 Chocklett Press	12/7/2015	\$11,815.20	12/7/2020	1/29/2021	\$0.00	\$11,815.20
170 Directmail.com	12/7/2015	\$2,160.71	12/7/2020	1/29/2021	\$0.00	\$2,160.71
171 Omega List Company	12/7/2015	\$21,657.64	12/7/2020	1/29/2021	\$0.00	\$21,657.64
172 Omega List Company	12/7/2015	\$55,952.64	12/7/2020	1/29/2021	\$0.00	\$55,952.64
173 RST Marketing	12/14/2015	\$60,892.86	12/7/2020	1/29/2021	\$0.00	\$60,892.86
174 Sisk Fulfillment Services	12/14/2015	\$5,044.53	12/7/2020	1/29/2021	\$0.00	\$5,044.53
175 Southwest Publishing & Mailing	12/14/2015	\$2,980.40	12/7/2020	1/29/2021	\$0.00	\$2,980.40
176 Zip Mailing Services, Inc.	12/14/2015	\$1,388.25	12/7/2020	1/29/2021	\$0.00	\$1,388.25
177 RST Marketing	12/14/2015	\$598.21	12/14/2020	2/5/2021	\$0.00	\$598.21
178 Westland Printers	12/21/2015	\$114,816.72	12/21/2020	2/5/2021	\$0.00	\$114,816.72
179 Zip Mailing Services, Inc.	12/28/2015	\$36,535.71	12/14/2020	2/5/2021	\$0.00	\$36,535.71
180 Nova Label	12/21/2015	\$3,222.82	12/21/2020	2/12/2021	\$0.00	\$3,222.82
181 Omega List Company	12/21/2015	\$26,788.19	12/21/2020	2/12/2021	\$0.00	\$26,788.19
182 RST Marketing	12/21/2015	\$2,024.51	12/21/2020	2/12/2021	\$0.00	\$2,024.51
183 Westland Printers	12/21/2015	\$114,816.72	12/21/2020	2/19/2021	\$0.00	\$114,816.72
184 Cooke Pictures	12/28/2015	\$898.08	12/28/2020	2/19/2021	\$0.00	\$898.08
185 Direct Answer	12/28/2015	\$1,998.35	12/28/2020	2/19/2021	\$0.00	\$1,998.35
186 Savanna Communications, LLC	12/28/2015	\$3,125.00	12/28/2020	2/19/2021	\$0.00	\$3,125.00
187 Savanna Communications, LLC	12/28/2015	\$7,750.00	12/28/2020	2/19/2021	\$0.00	\$7,750.00
188 Savanna Communications, LLC	12/28/2015	\$7,750.00	12/28/2020	2/19/2021	\$0.00	\$7,750.00

The 2016 Committee  
Failure to File or Timely File 24/48 Hour Reports

<i>First SOL Date</i>	<i>5/8/20</i>
<i>Last SOL Date</i>	<i>11/18/21</i>

Vendor Name <i>per Cmtie Database</i>	Transaction Date <i>per Cmtie Database</i> (Violation Date)	Amount <i>per Cmtie Database</i> (Violation Amount)	SOL 5 Years	SOL 5 Years+ 53 days (per tolling agreement)	Referable Amount Dropped as of <i>10/28/2019</i>	Referable Amount Still Viable as of <i>10/28/2019</i>
189 Colortree Group, Inc.	1/4/2016	\$23,157.53	1/4/2021	2/26/2021	\$0.00	\$23,157.53
190 CP Direct	1/4/2016	\$22,272.30	1/4/2021	2/26/2021	\$0.00	\$22,272.30
191 Omega List Company	1/4/2016	\$23,009.92	1/4/2021	2/26/2021	\$0.00	\$23,009.92
192 Savanna Communications, LLC	2/16/2016	\$5,500.00	2/16/2021	4/10/2021	\$0.00	\$5,500.00
193 Savanna Communications, LLC	2/16/2016	\$55,000.00	2/16/2021	4/10/2021	\$0.00	\$55,000.00
194 Zip Mailing Services, Inc.	11/2/2015	\$24,062.50	11/2/2020	12/25/2020	\$0.00	\$24,062.50
195 Zip Mailing Services, Inc.	11/23/2015	\$69,437.50	11/23/2020	1/15/2021	\$0.00	\$69,437.50
196 RST Marketing	2/1/2016	\$13,971.96	2/1/2021	3/26/2021	\$0.00	\$13,971.96
197 RST Marketing	2/1/2016	\$28,878.17	2/1/2021	3/26/2021	\$0.00	\$28,878.17
198 RST Marketing	2/16/2016	\$28,875.00	2/16/2021	4/10/2021	\$0.00	\$28,875.00
199 Campaign Funding Direct	2/22/2016	\$20,242.89	2/22/2021	4/16/2021	\$0.00	\$20,242.89
200 RST Marketing	3/14/2016	\$20,775.95	3/14/2021	5/6/2021	\$0.00	\$20,775.95
201 RST Marketing	3/14/2016	\$3,927.63	3/14/2021	5/6/2021	\$0.00	\$3,927.63
202 Valtim	3/21/2016	\$24,421.15	3/21/2021	5/13/2021	\$0.00	\$24,421.15
203 Zip Mailing Services, Inc.	8/29/2016	\$73,386.06	8/29/2021	10/21/2021	\$0.00	\$73,386.06
204 RST Marketing	9/26/2016	\$61,690.38	9/26/2021	11/18/2021	\$0.00	\$61,690.38
<u><b>\$3,680,040.35</b></u>						<b>\$0.00</b>
<u><b>\$3,680,040.35</b></u>						<b>\$3,680,040.35</b>

Items 194 through 204 are apparent  
independent expenditures. These items  
were reported on Schedule B as operating  
expenditures and not 24/48-Hour Reports  
were filed relating to these items.