

20L-17

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: August 19, 2020

ANALYST: Scott Bennett

I. COMMITTEE: SEAL PAC Supporting Electing American
Leaders PAC
C00570226
Paul Kilgore, Treasurer
1155 15th St. NW
Washington, DC 20005

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)
52 U.S.C. § 30116(a) and (f)
11 CFR § 103.3
11 CFR § 110.1(d)

III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions: Failure to Refund, Redesignate, or Reattribute Excessive and Prohibited Contributions within the Permissible Timeframe

SEAL PAC Supporting Electing American Leaders PAC (“the Committee”) received excessive contributions totaling \$29,770.00 from six (6) individuals during the 2019 calendar year. The Committee refunded the entire amount outside of the permissible timeframe (Attachment 2).

2019 July Monthly Report

During the 2019 July Monthly reporting period, the Committee received excessive contributions totaling \$10,750.00 from two (2) individuals that were not refunded, reattributed, or redesignated within the permissible timeframe (Attachment 2).

On September 18, 2019, a Request for Additional Information (RFAI) referencing the 2019 July Monthly Report was sent to the Committee. The RFAI requested clarification regarding the receipt of apparent excessive contributions. A chart was included with the RFAI identifying the apparent excessive contributions received from two (2) individuals and requested that the Committee take corrective action (Image 201909180300047940).

On October 23, 2019, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the 2019 July Monthly Report. The Committee stated, in part:

“We are aware of the contribution limits for donors to our committee. The contributions in question were temporarily excessive pending refund. These refunds will be shown on our upcoming November Monthly Report” (Image 201910239165292563).

2019 August Monthly Report

During the 2019 August Monthly reporting period, the Committee received excessive contributions totaling \$19,020.00 from five (5) individuals that were not refunded, reattributed, or redesignated within the permissible timeframe (Attachment 2).

On December 10, 2019, an RFAI referencing the 2019 August Monthly Report was sent to the Committee. The RFAI requested clarification regarding the receipt of apparent excessive contributions. A chart was included with the RFAI identifying the apparent excessive contributions received from five (5)¹ individuals and requested that the Committee take corrective action (Image 201912100300052714).

On January 14, 2020, the Committee filed an FEC Form 99 in response to the RFAI referencing the 2019 August Monthly Report. The Committee stated, in part:

“The excessive portions of the contributions in question have been refunded. Some of these refunds were shown on the November Monthly Report, some were shown on the December Monthly Report and some will be shown on the upcoming February Monthly Report” (Image 202001149167170861).

¹ The RFAI chart inadvertently included contributions from two (2) individuals with similar names. Only one of these individuals gave an excessive contribution on this report.

On April 23, 2020, the Reports Analysis Division (RAD) Analyst called Paul Kilgore, the Committee's Treasurer, to discuss the excessive contributions received by the Committee on its 2019 July Monthly and 2019 August Monthly Reports. The RAD Analyst left a voicemail message explaining that the issue could be referred to another office within the Commission for potential further action and advised the Committee could provide any further clarification on the issues if they wished to do so (Attachment 3).

On June 12, 2020, the RAD Analyst again called Mr. Kilgore to discuss the excessive receipts received by the Committee on its 2019 July Monthly and 2019 August Monthly Reports. The Analyst left another voicemail message explaining that the issue could be referred to another office within the Commission and invited the Committee to provide any further clarification on the issues (Attachment 3).

On June 16, 2020, the RAD Analyst emailed Mr. Kilgore through RAD's ServiceNow correspondence tracking portal asking him to contact the Analyst regarding a time-sensitive issue on the Committee's 2019 July Monthly and 2019 August Monthly Reports (Attachment 3).

On June 17, 2020, the RAD Analyst returned Mr. Kilgore's call, from June 16, 2020, to discuss the excessive receipts received by the Committee on its 2019 July Monthly and 2019 August Monthly Reports. Mr. Kilgore indicated he would speak with the account manager for this Committee to determine whether any additional information would be submitted. Mr. Kilgore stated that, if the Committee chose to respond, it would do so by the end of the current week (Attachment 3).

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

O-Index (2019-2020)															
Cmte. ID: C00570226 Cmte. Name: SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC															
Treasurer Name: KILGORE, PAUL Address: 1155 15TH ST NW, WASHINGTON, DC 20005															
Cmte. Type: Q (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	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			9/12/2019	1	201909129163221134				-	-	-	-	-	-	-
MS-T			10/23/2019	1	201910239165292563				-	-	-	-	-	-	-
MS-T			1/14/2020	1	202001149167170861				-	-	-	-	-	-	-
MS-T			5/20/2020	1	202005209232858589				-	-	-	-	-	-	-
RQ2	M5	N	7/30/2019	3	201907300300043229	4/1/2019	4/30/2019	7/30/2019	-	-	-	-	-	-	-
RQ2	M6	N	9/8/2019	3	201909080300047451	5/1/2019	5/31/2019	9/8/2019	-	-	-	-	-	-	-
RQ2	M7	N	9/18/2019	4	201909180300047940	6/1/2019	6/30/2019	9/18/2019	-	-	-	-	-	-	-
RQ2	M8	N	12/10/2019	4	201912100300052714	7/1/2019	7/31/2019	12/10/2019	-	-	-	-	-	-	-
RQ2	M3	N	4/30/2020	2	202004300300065882	2/1/2020	2/29/2020	4/30/2020	-	-	-	-	-	-	-
F3XN	M2	N	2/20/2019	32	201902209145536300	1/1/2019	1/31/2019		\$139,941	\$96,157	\$130,014	\$106,083	-	-	\$0
F3XN	M3	N	3/19/2019	24	201903199145736989	2/1/2019	2/28/2019		\$106,083	\$53,184	\$46,204	\$113,064	-	-	\$0
F3XN	M4	N	4/18/2019	53	201904189149491738	3/1/2019	3/31/2019		\$113,064	\$129,422	\$134,401	\$108,085	-	-	\$0
F3XN	M5	N	5/20/2019	133	201905209149780144	4/1/2019	4/30/2019		\$108,085	\$238,763	\$181,701	\$165,147	-	-	\$0
F3XN	M6	N	6/20/2019	136	201906209150139629	5/1/2019	5/31/2019		\$165,147	\$239,059	\$279,206	\$125,000	-	-	\$0
F3XN	M7	N	7/17/2019	60	201907179151393804	6/1/2019	6/30/2019		\$125,000	\$117,420	\$114,066	\$128,353	-	-	\$0
F3XN	M8	N	8/20/2019	158	201908209163008031	7/1/2019	7/31/2019		\$128,353	\$204,951	\$205,165	\$128,139	-	-	\$0
F3XN	M9	N	9/20/2019	171	201909209163466614	8/1/2019	8/31/2019		\$128,139	\$181,141	\$206,009	\$103,272	-	-	\$0
F3XN	M10	N	10/18/2019	123	201910189165091968	9/1/2019	9/30/2019		\$103,272	\$137,289	\$95,618	\$144,943	-	-	\$0
F3XN	M11	N	11/20/2019	126	201911209165704620	10/1/2019	10/31/2019		\$144,943	\$151,401	\$176,721	\$119,624	-	-	\$0
F3XN	M12	N	12/20/2019	148	201912209166739391	11/1/2019	11/30/2019		\$119,624	\$112,810	\$99,323	\$133,111	-	-	\$0
F3XN	YE	N	1/31/2020	135	202001319185082218	12/1/2019	12/31/2019		\$133,111	\$196,301	\$155,812	\$173,601	-	-	\$0
F3XN	M2	N	2/20/2020	45	202002209186878288	1/1/2020	1/31/2020		\$173,601	\$162,783	\$195,276	\$141,107	-	-	\$0
F3XN	M3	N	3/20/2020	99	202003209204021802	2/1/2020	2/29/2020		\$141,107	\$326,529	\$250,510	\$217,126	-	-	\$0
F3XN	M4	N	4/17/2020	123	202004179219690187	3/1/2020	3/31/2020		\$217,126	\$367,949	\$384,636	\$200,439	-	-	\$0
F3XN	M5	N	5/20/2020	147	202005209232857477	4/1/2020	4/30/2020		\$200,439	\$292,231	\$361,397	\$131,272	-	-	\$0
F3XN	M6	N	6/19/2020	298	202006199240005181	5/1/2020	5/31/2020		\$131,272	\$590,648	\$528,877	\$193,043	-	-	\$0
F3XN	M7	N	7/20/2020	354	202007209259974093	6/1/2020	6/30/2020		\$193,043	\$659,425	\$639,566	\$212,902	-	-	\$0
F24N	24		5/28/2020	1	202005289239503425				-	-	-	-	-	-	-
F24N	24		6/5/2020	1	202006059239624791				-	-	-	-	-	-	-
F24N	24		7/29/2020	1	202007299261188306				-	-	-	-	-	-	-
F24N	24		8/6/2020	1	202008069261261570				-	-	-	-	-	-	-
F24N	48		8/9/2019	1	201908099162398958				-	-	-	-	-	-	-
F24N	24		7/23/2020	1	202007239260796852				-	-	-	-	-	-	-
F1A		A	9/27/2019	4	201909279163574792				-	-	-	-	-	-	-
F24N	48		3/27/2020	1	202003279216027962				-	-	-	-	-	-	-
F24N	24		5/9/2019	1	201905099149654653				-	-	-	-	-	-	-
F24N	24		5/1/2020	1	202005019232351860				-	-	-	-	-	-	-
F24N	24		4/24/2020	1	202004249232292979				-	-	-	-	-	-	-
F24N	24		6/29/2020	1	202006299244223394				-	-	-	-	-	-	-
F24A	24		6/30/2020	1	202006309244224910				-	-	-	-	-	-	-
F24N	48		7/1/2020	2	202007019244227985				-	-	-	-	-	-	-
F24N	48		6/19/2020	1	202006199240005607				-	-	-	-	-	-	-
F24N	48		6/15/2020	1	202006159239782272				-	-	-	-	-	-	-
F24N	24		7/17/2020	1	202007179250379445				-	-	-	-	-	-	-
F24N	48		8/27/2019	1	201908279163106872				-	-	-	-	-	-	-

F24N	48	9/5/2019	1	201909059163152990	-	-	-	-	-	-	-	-	-	-	-
F24N	48	8/16/2019	1	201908169162885930	-	-	-	-	-	-	-	-	-	-	-
F24N	48	8/14/2020	1	202008149261317982	-	-	-	-	-	-	-	-	-	-	-
Totals										\$4,257,471	\$4,184,510				

O-Index (2017-2018)															
Cmte. ID: C00570226 Cmte. Name: SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC															
Treasurer Name: KILGORE, PAUL Address: 1155 15TH ST NW, WASHINGTON, DC 20005															
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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-T			1/31/2017	1	201701319042253802				-	-	-	-	-	-	-
MS-T			4/6/2017	1	201704069052024175				-	-	-	-	-	-	-
MS-T			4/26/2017	1	201704269053478901				-	-	-	-	-	-	-
MS-T			6/1/2017	1	201706019055185046				-	-	-	-	-	-	-
MS-T			6/1/2017	1	201706019055185047				-	-	-	-	-	-	-
MS-T			12/22/2017	1	201712229090329903				-	-	-	-	-	-	-
MS-T			12/30/2017	7	201801020300183144				-	-	-	-	-	-	-
MS-M			2/5/2018	1	201802059094238817				-	-	-	-	-	-	-
MS-O			2/12/2018	2	201802120300097919				-	-	-	-	-	-	-
MS-T			5/6/2018	1	201805069111991028				-	-	-	-	-	-	-
MS-T			5/7/2018	1	201805079111994296				-	-	-	-	-	-	-
MS-T			5/25/2018	1	201805259113358347				-	-	-	-	-	-	-
RQ1		A	5/15/2017	2	201705160300086528			5/15/2017	-	-	-	-	-	-	-
RQ2	MY	A	4/1/2018	2	201804010300001706	1/1/2017	6/30/2017	4/1/2018	-	-	-	-	-	-	-
RQ2	MY	N	11/20/2017	6	201711200300095240	1/1/2017	6/30/2017	11/20/2017	-	-	-	-	-	-	-
RQ2	YE	N	4/1/2018	3	201804010300001708	7/1/2017	12/31/2017	4/1/2018	-	-	-	-	-	-	-
RQ2	M2	N	4/19/2018	3	201804190300003794	1/1/2018	1/31/2018	4/19/2018	-	-	-	-	-	-	-
RQ2	M3	N	5/1/2018	2	201805010300008122	2/1/2018	2/28/2018	5/1/2018	-	-	-	-	-	-	-
RQ2	M4	A	6/25/2018	4	201806250300012659	3/1/2018	3/31/2018	6/25/2018	-	-	-	-	-	-	-
RQ2	M7	N	8/19/2018	3	201808190300018459	6/1/2018	6/30/2018	8/19/2018	-	-	-	-	-	-	-
RQ2	M9	N	10/23/2018	2	201810230300022303	8/1/2018	8/31/2018	10/23/2018	-	-	-	-	-	-	-
F3XN	MY	N	7/30/2017	252	201707309069853420	1/1/2017	6/30/2017		\$408,882	\$415,253	\$1,055,030	(\$230,895)	-	-	\$0
F3XA	MY	A	1/18/2018	253	201801189090433066	1/1/2017	6/30/2017		\$215,633	\$415,253	\$1,055,030	(\$424,143)	-	-	\$0
F3XA	MY	A	1/31/2018	468	201801319091112996	1/1/2017	6/30/2017		\$215,633	\$1,023,029	\$1,055,030	\$183,632	-	-	\$0
F3XN	YE	N	1/31/2018	751	201801319091145991	7/1/2017	12/31/2017		\$183,632	\$877,047	\$782,213	\$278,466	\$69,701	-	\$69,701
F3XN	M2	N	2/20/2018	31	201802209094624424	1/1/2018	1/31/2018		\$278,466	\$110,500	\$71,302	\$317,663	\$69,701	-	\$69,701
F3XA	M2	A	5/17/2018	31	201805179112077521	1/1/2018	1/31/2018		\$278,466	\$110,990	\$71,317	\$318,139	\$42,835	-	\$24,764
F3XN	M3	N	3/20/2018	57	201803209096616530	2/1/2018	2/28/2018		\$317,663	\$199,904	\$109,577	\$407,990	\$69,701	-	\$69,701
F3XA	M3	A	5/17/2018	57	201805179112077616	2/1/2018	2/28/2018		\$318,139	\$199,939	\$112,637	\$405,441	\$23,840	-	\$0
F3XN	M4	N	4/20/2018	71	201804209111669455	3/1/2018	3/31/2018		\$407,990	\$190,989	\$253,256	\$345,723	\$69,701	-	\$69,701
F3XA	M4	A	5/17/2018	68	201805179112077673	3/1/2018	3/31/2018		\$405,441	\$192,790	\$254,516	\$343,715	-	-	\$0
F3XA	M4	A	7/30/2018	69	201807309119333099	3/1/2018	3/31/2018		\$405,441	\$192,790	\$254,516	\$343,715	-	-	\$0
F3XN	M5	N	5/17/2018	102	201805179112078811	4/1/2018	4/30/2018		\$343,715	\$267,252	\$260,349	\$350,618	-	-	\$0
F3XN	M6	N	6/20/2018	93	201806209113913107	5/1/2018	5/31/2018		\$350,618	\$203,392	\$197,263	\$356,747	-	-	\$0
F3XN	M7	N	7/20/2018	161	201807209116020423	6/1/2018	6/30/2018		\$356,747	\$205,336	\$293,995	\$268,087	-	-	\$0
F3XA	M7	A	9/7/2018	161	201809079121653330	6/1/2018	6/30/2018		\$356,747	\$205,336	\$293,995	\$268,087	-	-	\$0
F3XN	M8	N	8/20/2018	168	201808209121384296	7/1/2018	7/31/2018		\$268,087	\$258,093	\$172,733	\$353,448	-	-	\$0
F3XN	M9	N	9/19/2018	263	201809199121964574	8/1/2018	8/31/2018		\$356,747	\$331,968	\$396,424	\$292,290	-	-	\$0
F3XA	M9	A	11/21/2018	263	201811219133806044	8/1/2018	8/31/2018		\$353,448	\$331,968	\$396,424	\$288,991	-	-	\$0
F3XN	M10	N	10/20/2018	263	201810209125894879	9/1/2018	9/30/2018		\$292,290	\$270,994	\$378,454	\$184,831	-	-	\$0

F3XA	M10	A	11/21/2018	263	201811219133806314	9/1/2018	9/30/2018		\$288,991	\$270,994	\$378,454	\$181,532	-	-	\$0
F3XN	12G	N	10/25/2018	322	201810259130863321	10/1/2018	10/17/2018		\$184,831	\$297,795	\$248,684	\$233,942	-	-	\$0
F3XA	12G	A	11/21/2018	322	201811219133806641	10/1/2018	10/17/2018		\$181,532	\$297,795	\$248,684	\$230,643	-	-	\$0
F3XN	30G	N	12/6/2018	495	201812069134386905	10/18/2018	11/26/2018		\$230,643	\$310,149	\$400,943	\$139,849	-	-	\$0
F3XN	YE	N	1/22/2019	186	201901229143904520	11/27/2018	12/31/2018		\$139,849	\$98,760	\$98,668	\$139,941	-	-	\$0
F1A		A	2/28/2017	4	201702289050585238				-	-	-	-	-	-	-
F1A		A	6/1/2017	4	201706019055185067				-	-	-	-	-	-	-
F24N	48		9/21/2018	4	201809219124230742				-	-	-	-	-	-	-
F24A	48		9/26/2018	4	201809269124246635				-	-	-	-	-	-	-
F24N	48		9/26/2018	8	201809269124246642				-	-	-	-	-	-	-
F24N	48		9/13/2018	3	201809139121710261				-	-	-	-	-	-	-
F24N	48		10/17/2018	8	201810179125564814				-	-	-	-	-	-	-
F24N	24		11/24/2018	1	201811249133807573				-	-	-	-	-	-	-
F24N	24		11/2/2018	3	201811029133577933				-	-	-	-	-	-	-
F24N	24		11/3/2018	3	201811039133585606				-	-	-	-	-	-	-
F24N	24		11/1/2018	15	201811019133575561				-	-	-	-	-	-	-
F1A		A	12/13/2018	4	201812139142298069				-	-	-	-	-	-	-
F1A		A	2/2/2018	4	201802029094237223				-	-	-	-	-	-	-
F1A		A	5/9/2017	4	201705099053512222				-	-	-	-	-	-	-
F1A		A	5/9/2017	4	201705099053512226				-	-	-	-	-	-	-
F24N	24		8/24/2018	2	201808249121520031				-	-	-	-	-	-	-
F24N	24		9/5/2018	1	201809059121558552				-	-	-	-	-	-	-
F24N	48		10/11/2018	7	201810119124459649				-	-	-	-	-	-	-
F24N	24		10/24/2018	15	201810249130821137				-	-	-	-	-	-	-
Totals											\$4,647,541	\$4,723,233			

O-Index (2015-2016)															
Cmte. ID: C00570226 Cmte. Name: SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC															
Treasurer Name: KILGORE, PAUL Address: 1155 15TH ST NW, WASHINGTON, DC 20005															
Cmte. Type: Q (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	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			7/15/2015	1	201507159000178286				-	-	-	-	-	-	-
MS-T			9/22/2015	1	201509229002774315				-	-	-	-	-	-	-
MS-T			9/28/2015	5	201509280300023941	4/1/2015	6/30/2015		-	-	-	-	-	-	-
MS-T			12/15/2015	1	201512159004206903				-	-	-	-	-	-	-
MS-T			5/10/2016	1	201605109015397737				-	-	-	-	-	-	-
MS-T			5/11/2016	1	201605119015432116				-	-	-	-	-	-	-
MS-T			9/28/2016	2	201609289032142460				-	-	-	-	-	-	-
MS-T			12/8/2016	1	201612089039980959				-	-	-	-	-	-	-
RQ2	Q2	N	8/18/2015	5	201508180300002177	4/1/2015	6/30/2015	8/18/2015	-	-	-	-	-	-	-
RQ2	Q3	A	4/5/2016	2	201604050300040983	7/1/2015	9/30/2015	4/5/2016	-	-	-	-	-	-	-
RQ2	Q3	N	11/11/2015	2	201511110300007696	7/1/2015	9/30/2015	11/11/2015	-	-	-	-	-	-	-
RQ2	YE	N	4/6/2016	6	201604060300041305	10/1/2015	12/31/2015	4/6/2016	-	-	-	-	-	-	-
RQ2	Q1	A	8/25/2016	3	201608250300057629	1/1/2016	3/31/2016	8/25/2016	-	-	-	-	-	-	-
RQ2	Q2	A	5/15/2017	2	201705160300086521	4/1/2016	6/30/2016	5/15/2017	-	-	-	-	-	-	-
RQ2	Q2	A	3/6/2017	3	201703070300082099	4/1/2016	6/30/2016	3/6/2017	-	-	-	-	-	-	-
RQ2	Q3	A	5/15/2017	2	201705160300086524	7/1/2016	9/30/2016	5/15/2017	-	-	-	-	-	-	-
F3XN	Q1	N	4/14/2015	10	15970340703	1/1/2015	3/31/2015		\$0	\$9,963	\$6,477	\$3,485	-	-	\$0
F3XN	Q2	N	7/15/2015	50	201507159000176513	4/1/2015	6/30/2015		\$3,485	\$224,340	\$153,764	\$74,062	-	-	\$0
F3XA	Q2	A	4/11/2017	53	201704119052067142	4/1/2015	6/30/2015		\$3,485	\$224,340	\$156,180	\$71,645	-	-	\$0

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F3XN	Q3	N	10/15/2015	132	201510159002918037	7/1/2015	9/30/2015		\$74,062	\$255,998	\$242,298	\$87,762	-	-	\$0
F3XA	Q3	A	12/15/2015	132	201512159004205603	7/1/2015	9/30/2015		\$74,062	\$255,998	\$242,298	\$87,762	-	-	\$0
F3XA	Q3	A	4/11/2017	132	201704119052067448	7/1/2015	9/30/2015		\$71,645	\$255,998	\$242,298	\$85,345	-	-	\$0
F3XA	Q3	A	4/11/2017	138	201704119052067682	7/1/2015	9/30/2015		\$71,645	\$255,998	\$249,016	\$78,628	-	-	\$0
F3XN	YE	N	1/29/2016	144	201601299004790297	10/1/2015	12/31/2015		\$87,762	\$358,070	\$378,944	\$66,887	-	-	\$0
F3XA	YE	A	5/11/2016	144	201605119015431686	10/1/2015	12/31/2015		\$87,762	\$358,070	\$378,944	\$66,887	-	-	\$0
F3XA	YE	A	4/11/2017	144	201704119052068008	10/1/2015	12/31/2015		\$78,628	\$358,070	\$378,944	\$57,753	-	-	\$0
F3XA	YE	A	4/11/2017	148	201704119052068339	10/1/2015	12/31/2015		\$78,628	\$358,070	\$382,485	\$54,213	-	-	\$0
F3XN	Q1	N	4/14/2016	68	201604149012329815	1/1/2016	3/31/2016		\$66,887	\$342,487	\$245,103	\$164,272	-	-	\$0
F3XA	Q1	A	5/11/2016	68	201605119015431830	1/1/2016	3/31/2016		\$66,887	\$342,487	\$245,103	\$164,272	-	-	\$0
F3XA	Q1	A	9/28/2016	69	201609289032142500	1/1/2016	3/31/2016		\$66,887	\$342,487	\$245,103	\$164,272	-	-	\$0
F3XA	Q1	A	4/11/2017	69	201704119052068660	1/1/2016	3/31/2016		\$54,213	\$342,487	\$245,103	\$151,597	-	-	\$0
F3XA	Q1	A	4/11/2017	73	201704119052068834	1/1/2016	3/31/2016		\$54,213	\$342,487	\$251,647	\$145,053	-	-	\$0
F3XN	Q2	N	7/15/2016	259	201607159020567572	4/1/2016	6/30/2016		\$164,272	\$616,891	\$602,468	\$178,695	-	-	\$0
F3XA	Q2	A	8/3/2016	260	201608039022174183	4/1/2016	6/30/2016		\$164,272	\$621,891	\$602,468	\$183,695	-	-	\$0
F3XA	Q2	A	3/16/2017	260	201703169050869634	4/1/2016	6/30/2016		\$164,272	\$621,891	\$602,468	\$183,695	-	-	\$0
F3XA	Q2	A	4/5/2017	261	201704059052014209	4/1/2016	6/30/2016		\$164,272	\$621,891	\$612,468	\$173,695	-	-	\$0
F3XA	Q2	A	4/11/2017	267	201704119052069519	4/1/2016	6/30/2016		\$145,053	\$621,891	\$635,153	\$131,790	-	-	\$0
F3XN	Q3	N	10/14/2016	557	201610149032487051	7/1/2016	9/30/2016		\$183,695	\$820,295	\$662,830	\$341,160	-	-	\$0
F3XA	Q3	A	3/16/2017	557	201703169050870433	7/1/2016	9/30/2016		\$183,695	\$820,295	\$662,830	\$341,160	-	-	\$0
F3XA	Q3	A	4/5/2017	557	201704059052014526	7/1/2016	9/30/2016		\$173,695	\$820,295	\$662,830	\$331,160	-	-	\$0
F3XA	Q3	A	4/11/2017	567	201704119052070948	7/1/2016	9/30/2016		\$131,790	\$820,295	\$701,448	\$250,638	-	-	\$0
F3XN	12G	N	4/26/2017	232	201704269053479555	10/1/2016	10/19/2016		\$250,638	\$240,684	\$146,497	\$344,825	-	-	\$0
F3XN	30G	N	12/8/2016	407	201612089039975611	10/1/2016	11/28/2016		\$341,160	\$395,539	\$330,800	\$405,899	-	-	\$0
F3XA	30G	A	4/4/2017	415	201704049051984572	10/1/2016	11/28/2016		\$341,160	\$395,539	\$330,800	\$405,899	-	-	\$0
F3XA	30G	A	4/5/2017	415	201704059052015455	10/1/2016	11/28/2016		\$331,160	\$395,539	\$330,800	\$395,899	-	-	\$0
F3XA	30G	A	4/12/2017	415	201704129052081251	10/1/2016	11/28/2016		\$250,638	\$395,539	\$332,472	\$313,705	-	-	\$0
F3XA	30G	A	4/26/2017	189	201704269053479209	10/20/2016	11/28/2016		\$344,825	\$154,854	\$185,974	\$313,705	-	-	\$0
F3XN	YE	N	1/31/2017	10	201701319042251080	11/29/2016	12/31/2016		\$405,899	\$1,896	\$93,830	\$313,965	-	-	\$0
F3XA	YE	A	4/4/2017	10	201704049051985018	11/29/2016	12/31/2016		\$405,899	\$1,050	\$93,830	\$313,118	-	-	\$0
F3XA	YE	A	4/5/2017	10	201704059052015885	11/29/2016	12/31/2016		\$395,899	\$1,050	\$93,830	\$303,118	-	-	\$0
F3XA	YE	A	4/12/2017	11	201704129052082016	11/29/2016	12/31/2016		\$313,705	\$1,050	\$94,003	\$220,751	-	-	\$0
F3XA	YE	A	4/26/2017	11	201704269053479891	11/29/2016	12/31/2016		\$313,705	\$1,050	\$94,003	\$220,751	-	-	\$0
F3XA	YE	A	4/27/2017	13	201704279053482633	11/29/2016	12/31/2016		\$313,705	(\$4,068)	\$94,003	\$215,633	-	-	\$0
F1MN			1/15/2016	1	201601159004507911				-	-	-	-	-	-	-
F1A		A	2/25/2015	5	15950832305				-	-	-	-	-	-	-
F1		M	1/22/2016	3	201601220300041056				-	-	-	-	-	-	-
Totals										\$3,024,519	\$2,808,885				

SEAL PAC Supporting Electing American Leaders PAC (C00570226)

Excessive and Prohibited Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

Name	Date	Contribution Amount	Report	Excessive/Prohibited Amount Received During Reporting Period & Not Refunded within Timeframe	Refunded # Days Since Receipt
Challey, Robert	5/24/2019	\$5,000.00	2019 June Monthly		
Challey, Robert	7/23/2019	\$1,000.00	2019 August Monthly		
Challey, Robert	11/25/2019	-\$1,000.00	2019 December Monthly	\$1,000.00	125
Covington, Gary	5/21/2019	\$10,000.00	2019 June Monthly		
Covington, Gary	6/3/2019	-\$5,000.00	2019 July Monthly		
Covington, Gary	6/25/2019	\$10,000.00	2019 July Monthly		
Covington, Gary	10/29/2019	-\$10,000.00	2019 November Monthly	\$10,000.00	126
Covington, G N ²	7/29/2019	\$20,000.00	2019 August Monthly		
Covington, Gary N.	1/8/2020	-\$20,000.00	2020 February Monthly	\$15,000.00	163
Fletcher, Marguerite	1/2/2019	\$500.00	2019 February Monthly		
Fletcher, Marguerite	2/11/2019	\$500.00	2019 March Monthly		
Fletcher, Marguerite	4/1/2019	\$500.00	2019 May Monthly		
Fletcher, Marguerite	4/23/2019	\$750.00	2019 May Monthly		
Fletcher, Marguerite	5/6/2019	\$1,000.00	2019 June Monthly		
Fletcher, Marguerite	5/20/2019	\$1,000.00	2019 June Monthly		
Fletcher, Marguerite	6/4/2019	\$500.00	2019 July Monthly		
Fletcher, Marguerite	6/14/2019	\$1,000.00	2019 July Monthly		
Fletcher, Marguerite	7/23/2019	\$2,000.00	2019 August Monthly		
Fletcher, Marguerite	10/29/2019	-\$750.00	2019 November Monthly	\$750.00	98
Fletcher, Marguerite	1/8/2020	-\$4,000.00	2020 February Monthly	\$2,000.00	208

² The RFAI sent on the 2019 August Monthly Report inadvertently assessed “Gary Covington” and “G N Covington” as the same individual. While they share a mailing address, their reported name and employer/occupation information are different. The violation amounts for these two individuals are separate for purposes of this referral.

SEAL PAC Supporting Electing American Leaders PAC (C00570226)

Excessive Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

Name	Date	Contribution Amount	Report	Excessive/Prohibited Amount Received During Reporting Period & Not Refunded within Timeframe	Refunded # Days Since Receipt
Hunter, John	1/4/2019	\$360.00	2019 February Monthly		
Hunter, John	1/8/2019	\$720.00	2019 February Monthly		
Hunter, John	3/11/2019	\$720.00	2019 April Monthly		
Hunter, John	3/25/2019	\$400.00	2019 April Monthly		
Hunter, John	4/8/2019	\$400.00	2019 May Monthly		
Hunter, John	4/29/2019	\$400.00	2019 May Monthly		
Hunter, John	5/10/2019	\$500.00	2019 June Monthly		
Hunter, John	5/20/2019	\$720.00	2019 June Monthly		
Hunter, John	6/14/2019	\$500.00	2019 July Monthly		
Hunter, John	7/8/2019	\$500.00	2019 August Monthly		
Hunter, John	7/22/2019	\$300.00	2019 August Monthly		
Hunter, John	11/25/2019	-\$820.00	2019 December Monthly	\$520.00	140
Schaller, Roger	3/19/2019	\$1,000.00	2019 April Monthly		
Schaller, Roger	5/20/2019	\$1,500.00	2019 June Monthly		
Schaller, Roger	7/29/2019	\$3,000.00	2019 August Monthly		
Schaller, Roger	11/25/2019	-\$500.00	2019 December Monthly	\$500.00	119
Total Excessive Contributions Not Refunded Within Timeframe (all reports)				\$29,770.00	